

Submission: To The Irish Aviation Authority
Re: Slot provision at Dublin Airport

Introduction:

The Irish Aviation Authority's (IAA) decision to maintain the current number of slots at Dublin Airport, facilitates the DAA in processing more than 65 aircraft movements between the hours of 2300 and 0700 and additionally will facilitate DAA in breaching the 32 million passenger cap imposed by An Bord Pleanála. Indeed, the IAAs dismissal of the planning restrictions re the above is a concerning and misguided approach. This objection aims to provide detailed reasons as to why the IAA's decision is wrong and why reducing slots is necessary to prevent the Dublin Airport Authority (DAA) from again exceeding the passenger cap.

1. Breaching the Passenger Cap:

In 2019, the DAA (a semi-State company) breached the 32 million passenger cap set by An Bord Pleanála, which was put in place to ensure sustainable growth and prevent excessive strain on infrastructure and local communities. This breach demonstrates a failure on the part of the DAA to effectively manage passenger numbers and adhere to regulatory requirements. By maintaining the current number of slots, the IAA is essentially enabling the DAA to repeat this breach in 2024. Regardless of outside pressures the IAA is obliged to adhere to the law. Facilitating DAA by structuring slot access in such a way as to assist it in breaching its planning permission re Condition 5 is outside the remit of IAA. Indeed, in making an assessment regarding the "enforceability" of Condition 5 the IAA should err on the side of caution to interpret Condition 5 as being a "constraining factor on traffic at Dublin Airport" (S24 Draft Decision 3.29)

2. Infrastructure Strain:

Dublin Airport's infrastructure is already under significant strain due to increased passenger numbers in recent years. The existing facilities, such as terminals, runways, and parking areas, are struggling to cope with the current level of traffic. Roads around the airport have not been upgraded since the initial restrictions were put in place. Allowing the DAA to continue operating at full capacity without reducing slots will exacerbate these issues, leading to overcrowding, longer queues, and decreased overall efficiency.

3. Environmental Concerns:

The aviation industry is a significant contributor to greenhouse gas emissions and climate change. By not reducing slots at Dublin Airport, the IAA is indirectly supporting increased air travel and subsequent emissions. This goes against global efforts to mitigate climate change and reduce carbon footprints. It is crucial for regulatory bodies like the IAA to prioritise sustainability and take proactive measures to limit aviation's environmental impact.

Reducing slots would help control passenger numbers and encourage more sustainable travel practices.

4. Community Impact:

The local community of Saint Margarets/The Ward and have already been negatively affected by the airport's expansion and increase in passenger numbers. Issues such as noise

pollution, traffic congestion, and strain on local infrastructure have been reported to Fingal County Council by numerous residents. By allowing the DAA to maintain the current number of slots, the IAA is disregarding the concerns and well-being of these communities.

Reducing slots would alleviate some of these negative impacts and demonstrate a commitment to addressing community concerns.

5. Planning Appeals Authority's Decision:

The 32 million passenger cap was imposed by An Bord Pleanála, not Fingal County Council. ABP is an independent planning appeals authority in Ireland. This decision was made after careful consideration of various factors, including environmental impact, infrastructure capacity, and community concerns. The IAA's decision to not reduce slots at Dublin Airport directly contradicts the planning appeals authority's ruling. **By disregarding this decision, the IAA undermines the authority and integrity of An Bord Pleanála.**

Conclusion:

In conclusion, the Irish Aviation Authority's decision not to reduce slots at Dublin Airport is flawed and misguided. Maintaining the current number of slots will facilitate the DAA in breaching the 32 million passenger cap, further straining infrastructure, exacerbating environmental concerns, and disregarding community impact. It is crucial for the IAA to reconsider its stance and prioritise sustainable growth that aligns with regulatory requirements and community well-being.

Regards
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