

SLIGO NORTH WEST AIRPORT COMPANY PLC

Submission to:

Department of Transport,
Tourism and Sport

on

Preparation of new Regional
Airports Programme 2020 to
2024

September 2019



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1. INTRODUCTION

This submission is made by Sligo North West Airport Company plc to the Department of Transport, Tourism and Sport in response to the consultation invitation on the proposed new Regional Airports Programme for the period 2020 to 2024.

Sligo North West Airport Company plc owns and operates Sligo Airport at Strandhill, Co. Sligo.

2. ABOUT SLIGO AIRPORT

Sligo Airport is located in Strandhill, Co Sligo, 8km west of Sligo City. It was established in 1974 and officially opened in 1983 with the commencement of the first commercial scheduled flight. It provided continuous commercial flights until the withdrawal of the PSO (Public Service Obligation) from the Sligo – Dublin route in 2011. The main business of the Airport is now the servicing of the North West Coastguard Search and Rescue Helicopter Service (SAR). The Sligo SAR base is the busiest in the country with over 350 missions annually.

The prime objective of Sligo Airport is to provide a safe public air transport facility as a means of helping to redress the economic and social imbalance which exists between the North West area as a whole and the rest of the country. This objective is further strengthened by the designation of Sligo as a Regional Growth Centre in the National Planning Framework, Project 2040.

Sligo Airport is a significant employer locally with a total of 47 persons employed on site, 15 full time airport staff, 28 Search and Rescue service staff and 4 employed at an aircraft maintenance facility. It supports further employment and economic activity in the region through purchase of good and services and hosting of the weekly Strandhill Peoples Market catering for 40 traders and up to 1,500 customers each week. It is located adjacent to the Sligo Enterprise and Technology Centre, where 150 people are employed. The centre is now developing Ireland's first dedicated digital gaming campus which will add an additional 100 employees. There is much synergy between Sligo Airport and the Enterprise Centre, especially as Sligo Airport rolls out its new forward strategy.

Since the cessation of PSO services in 2011, Sligo airport has focussed on the provision of Search and Rescue services, Medivac, Out of Hour urgent operations and a facility for re-fuelling. It maintains a 24 hour ATC service to facilitate this. Its coastal North West location is particularly valuable for such functions and further possibilities may arise servicing various exploration and renewable energy developments off the North West coast.

Sligo Airport achieved EASA certification as an ANSP in 2011 and Aerodrome Certification under the European Aviation Safety Agency in December 2017. The company aims to maintain an EASA fully operational airport which gives Sligo and the North West region air access capabilities for business, tourism and leisure.

3. CONSULTATION PAPER ISSUES

This section sets out the responses of Sligo Airport to the specific consultation questions posed in the Department of Transport, Tourism and Sport Consultation Paper.

HAVING REGARD TO THE ACTIONS ON REGIONAL AIRPORTS IN THE NATIONAL AVIATION POLICY, WHAT ARE YOUR VIEWS ON THE EFFECTIVENESS OF THE CURRENT REGIONAL AIRPORTS PROGRAMME?

The current Regional Airports Programme 2015 - 2019, provides support to four regional airports; Donegal, Kerry, Ireland West Airport Knock (IWAK) and Waterford. Under this programme, Regional Airports were supported to grow to a viable, self-sustaining position, particularly considering the contribution that they make to their regional and local economy. The programme provided financial support (OPEX and CAPEX) for the regional airports to facilitate the airports in developing and implementing business plans leading to self-sufficiency within a ten year period and include the need for regional and local business investment as a result.

Sligo Airport was excluded from the provision of the current programme on the basis that it had no commercial scheduled or non-scheduled air services. As the airport is the North West SAR Base it still has to maintain full operational compliance with all aviation regulations, thus incurring significant cost, but without the income stream from commercial air services or the OPEX fund to support. This situation pertains to the present, with the airport using approximately €70,000 of its own resources annually to maintain its EASA standards and accreditations and a safe, viable operational airfield.

While Sligo Airport agrees with the overall objective of the 2015- 2019 programme to support the continued operation and capital investment requirements of regional airports, it is firmly of the view that Sligo should have been included as a regional airport within the remit of the programme and that it should be recognised and included as a regional airport in the 2020 – 2024 programme.

WHAT, IF ANY, CHANGES WOULD YOU LIKE TO SEE REFLECTED IN THE NEW PROGRAMME AND WHY?

Sligo Airport is asking the Department of Transport to consider the following changes to the Regional Airport's Policy for inclusion in the Regional Airports Programme 2020 – 2024. Further details on the rationale for these changes are contained in section 7 – Recognising Sligo as a Regional Airport.

Programme Scope

That Sligo Airport is fully recognised as a Regional Airport within the scope of the new Regional Airports Programme 2020 – 2024. Sligo Airport holds and maintains European Aviation Safety Agency Aerodrome Certification and ANSP Certification. It is the busiest base for the Coastguard SAR service and under its strategic plan 2019 -2024 it aims to grow its regional economic significance and role as part of Sligo's designation as a Regional Growth Centre under Project 2040.

Operating Aid

For operating aid for airports with less than 200,000 passengers per annum, operating aid should not have a 10 year limit, i.e. it should be indefinite to support such airports where they can demonstrate that they make a significant contribution to regional economic development and furtherance of national aviation policy.

Operating aid should have a coverage intensity of up to 80% to cover the full airport costs, both economic and non-economic and not just the identified financing gap. It is unrealistic to expect smaller airports such as Sligo to be able to increase charges for fuel and services to cover all costs incurred. In the case of Sligo, it presently does not have multiple revenue streams to absorb costs over, nor can it significantly increase charges to its main client the Coastguard, to fully recover operational costs.

Capital Investment Aid

Airports with less than 200,000 passengers per year should receive support to cover 100% of the cost of all capital investment projects and not the current 75%. The current limitation to safety and security capital investment should be expanded to include all capital investment projects that can demonstrate a return on regional economic criteria.

Provision should be made for Regional Airports to apply for multi-year investment programmes to allow for proper strategic planning and development.

Subvention and Aid Rates

It is the view of Sligo Airport that the new Regional Airports Programme should have aid rates as follows:

- 1) Capital aid should be 100% funded for airports with less than 200,000 passengers and serving an important regional or national functions.
- 2) Opex support should be funded up to 80% for PPR-O and other direct operational costs and not just the funding gap. PPR-O costs are recognised by the Department of Transport as those that serve an important public function and therefore should be subsidised, thus allowing the airport to concentrate on developing commercial activities.
- 3) The determination of the amounts of aid to award, should not be on an ex ante basis as is the present case. Opex costs subvention should be considered on a case by case basis and validated by the presentation of a 5 year business plan with measurable key performance metrics. Should KPI's not be achieved future aid requests should be adjusted in line with achievements?

HOW DO YOU THINK THE NEW PROGRAMME CAN BEST SUPPORT IRELAND'S TRANSITION TO A LOW CARBON ECONOMY, HAVING REGARD TO POLICY ON CLIMATE ACTION AND SUSTAINABILITY?

Airports by their nature are long life assets. They have significant capacity to act as models or demonstrators of new low carbon initiatives in design, build and operational phases. Future investments either as capital or operational supports should be linked to strong environmental performance with measureable performance indicators.

The Regional Airports Programme 2020 – 2024 should incorporate best practice and research in low carbon practices into its objectives. For example a research report completed in 2108 under the EU funded Interreg Spara project examined low carbon strategies for Inverness and Kirkwall Airports. This report provided action plans for both airports, covering areas such as future proofing the airport

to meet demands for electric cars and charging infrastructure. It addressed best practice with the learnings and recommendations applicable to other remote and peripheral airports in Europe.

In addition there are further measures that airports can undertake to support Ireland's transition to a low carbon society. These include:

Improved Community Engagement –

- Through information provision on low carbon projects and initiatives undertaken;
- Cooperation with host communities on projects to reduce carbon foot print of airports such as maximising the use of large green expanses of airport grounds as carbon sinks and suitable wildlife habitats;
- Communities realising the economic and social benefits that airports bring and working a much more cooperative framework to maximise benefits for all

Airports being Green Leaders-

- Airports have a good opportunity to act as Green leaders in terms of showcasing environmental responsibility
- Piloting and testing green and new renewable energy technologies
- Through their capital programmes investing in buildings and facilities that go beyond current NZE requirements
- To showcase and test future proofing climate strategies in new building designs, constructions and operations to be prepared for climate induced weather changes, thus saving future capital investment
- Ensure through service contracts with airport partners that they operate to the highest environmental and green standards

Sligo Airport contributes to Climate change policy through:

Ensuring it maintains its EASA accreditation and retains the SAR base as Sligo which is acknowledged as the best location for the North West base in terms of:

- Optimum and most effective coverage of the North West Area from Derry to Galway as this allows the SAR service its most effective mission range. Sligo is the closest in proximity to major emergency hospitals including Sligo, Galway and Dublin

Through its strategic plan 2019 – 2014, Sligo Airport will support existing and new uses for an existing asset. The airport can via its strategic plan with small state support, become a local and regional hub of innovative aviation based enterprise and activity. This will support local jobs and investment, thus relieving pressure on larger urban centres such as Dublin and Galway

WHAT ARE YOUR VIEWS ON THE PSO SCHEME, THE AIR SERVICE ROUTES CURRENTLY BEING SUPPORTED AND THE NEED FOR A CONTINUATION OF THE SCHEME BEYOND 2022?

Presently, Sligo does not benefit from a PSO service which was withdrawn under the review in 2011. The cessation of the service was based on the surface travel time to Dublin being less than 3 hours.

Sligo Airport supports the policy of achieving efficient regional connectivity throughout Ireland which the PSO service is designed to do. From a Sligo perspective it accepts that surface journey times to Dublin are efficient and the close location of Ireland West Airport gives a reasonable coverage of international connections serving the region. The importance of regional connectivity for economic, social and tourism reasons are well outlined in this submission and Sligo Airport is support of measures that improve and enhance regional connectivity.

Sligo Airport notes the cost to the state of the provision of the PSO service in terms of cost per passenger. In terms of achieving value for money for the investment in the PSO service, a detailed examination of the impacts and value for money of the PSO services on the regions they cover should be carried out. This should include elements such as:

- The increased spend in the regions from tourism as a direct result of the PSO
- The regional impacts on job creation and economic activity
- Examination of any potential displacement impacts

4. THE IMPORTANCE OF REGIONAL AIRPORTS

Regional airports continue to be “vital part of any region’s strategy” as they help to keep that region connected. Connectivity is not only concerned with passenger connectivity but also regional connectivity in the case of Sligo such as:

- Maintaining the most efficient and effective Marine and Coast Guard Search and Rescue Facility for the North West of Ireland
- Provide an asset for business, corporate and leisure air traffic
- Provide a recreational asset for local aero clubs and private aviation sector
- To provide an educational and training facility for those wishing to become pilots and / or work in the aviation sector.

The prosperity of the communities and the small or regional airports that serve them depends on job creation and being connected to the market, both domestically and internationally. A regional or small airport's success should not be measured so much on the actual levels of commercial services of airline seats available, but by having viable and efficient ways for the community's businesses to connect to their markets and customers.

SOCIAL COHESION AND VALUE

Social cohesion and value are enhanced by the presence and function of regional airports. As outlined, airports support social and economic functions by providing opportunities for employment and the incidental economic spin offs that arise. In the case of Sligo Airport, it serves an important societal function through its base for the SAR service. This service provides an efficient maritime and inland rescue service and air ambulance and medivac services as a support to civil powers when required. Sligo’s location as an SAR base is ideal given its mid way point between Galway and Derry.

ECONOMIC COMPETITIVENESS

Regional airports constitute an important part of the national economic infrastructure. The presence of a regional airport influences a wide range of economic activities such as exports, boosting business efficiency and productivity, attracting inward investment, and influencing business location and retention. Being a magnet for such activities, the presence of a regional airport allows businesses to be more competitive, and thus increasing the economic competitiveness of the region.

The economic value of small airports was studied in detail as part of a 3 year EU Interreg funded project entitled Spara2020. The work examined the economic value of small and peripheral airports in the Northern Periphery & Arctic Area through identifying the different ways that they are important to the economic viability and development of the regions or sub-regions in which they are located, and the quantifiable difference that they can make to employment and other measures of economic welfare. It found that smaller airports are critically important to businesses and organisations in their catchment area, even though they might not often use them. This relates to their decision to locate or stay in the area, accessibility to business customers and suppliers, and attraction of key staff.

The designation of Sligo as Regional Growth Centre under the National Planning Framework and Project 2040, must ensure that it at the very least Sligo retains important regional assets such as its Airport. Sligo is also a key city along the Atlantic Economic Corridor and the Wild Atlantic Way. Its

proximity to Northern Ireland and the possible negative impacts of Brexit on the regional economy cannot be underestimated. Supporting the growth of Sligo Airport as a central cog of the regional economic strategy is more important than ever to counter any negative impacts of Brexit.

At National level the designation of Sligo as a Regional Growth Centre for the North West under Project 2040, launched in 2019 means:

- Sligo is designated as the economic engine of the region where population growth of up to 180,000 is targeted over the next 20 years
- Sligo's significance as a centre of employment and services is much greater than its scale in terms of population and recognises the counties latent capacity to enhance its regional role and become a strong magnet for investment and employment growth.

Just as the National Aviation Policy sets the framework for growth and expansion of the state airports and recognised regional airports, policy must provide a mandate for other airports to meet their full potential. Without equal billing, and a commitment to progress without delay the ambitious and innovative forward strategy put forward by Sligo Airport, the North West region risks losing a vital assets and falling further behind the rest of the country. Therefore National Airports Strategy and Policy needs to look right across the country and recognise that dynamic growth is occurring in places like the Sligo and the North West. Future policy and financial support streams need to be based on robust and realistic evidence, giving more emphasis to local dynamics and innovative actions rather than models based on past business performance and operations that are not relevant in the current environment.

Secondly, the Regional Airports Programme should provide clear and unambiguous policy and funding support for regional airports which have the ambition to grow and fulfil their regional development and enterprise role in a greater manner. Policy should reward those airports that have shown resilience and conscientious management of their resources. Supports should be based on strict and ambitious key performance metrics where deliverables can be clearly measured.

5. THE IMPORTANCE OF SLIGO AIRPORT

Strong local and regional economics across Europe have well developed and efficient transport systems and linkages to larger centres and markets. These include road, rail, air and public transport systems. Therefore strong and vibrant regional airports play a key role in a regions competitiveness and innovation scorecard in terms of the regions ability to attract and retain investment and human capital. Regional airports fulfil both economic and social roles within their catchment areas, and there is a strong correlation between a region's GVA and the vibrancy of the regional airport. But the direct economic and social contribution an airport makes to a region and the understanding by community, statutory and business stakeholders of the role that the airport plays in delivering wider growth in the regional economy is what is important.

There is strong anecdotal evidence that simply having an airport in a region can make a difference to whether investment can be attracted to an area. However small the airport and its series of connections if any, the fact that it is present in a region allows investors or those seeking to trade to recognise that they are dealing with a modern forward looking and outward region and one with aviation capability. While, ultimately, it is acknowledged that airports and air access is only one of a number of factors that contribute to regional prosperity and well-being, the very corollary of not having an airport is that the region now has one less positive attribute or asset which can result in it never getting on the investment decision shortlist.

What is needed to retain and indeed enhance the regional prosperity is a broad portfolio of positive and vibrant indicators that together are important for attracting people to live and work in the region, attract investment, provide connections to markets, capital and intellectual capital, all of which together help the area to flourish and prosper. It is within this context that future policy and support for Sligo Airport must be viewed.

Sligo recognises that Ireland West Airport is the main international gateway to the region. However Sligo Airport is still a necessary and important regional asset as a base for SAR, a facility for private, corporate and tourist based aviation and its future role as an economic development engine within Co. Sligo and beyond.

A study by Richard Florida, assisted by the Martin Prosperity Institute of the University of Toronto, found that ***it is the capacity of people that influence the regional productivity***. But to build capacity of people, it is not necessarily the size of the region or its population, but the things that the region can garner and hold on to that are important. In other words the more regional assets that a region can create / retain / develop / improve, the stronger its regional productivity will be and the stronger that region will become. Therefore the importance of supporting and maintaining an airport in Sligo, as a regional asset is a key part of the regional development and growth picture.

For example the loss of an airport as a piece of infrastructure (however underutilised) is a significant loss to the region. No longer can the regions stakeholders state that we have an operational and modern airport capable of taking private / commercial traffic.

It results in the loss of a very specific skillset of people, which will not return. This weakens the diversity of the skills base of the region, its innovation and entrepreneurial capacity and creates further weakening impacts down the chain of the regional economic prosperity building blocks. Over

time if these items are not supported and maintained, the regional building blocks become so weak that the whole regional prosperity structure crumbles and fails, leaving the region so far behind that it is incapable of catching up or recovering.

6. SLIGO AIRPORT FUTURE STRATEGY

Sligo Airport has prepared a five year business strategy that aims to position it as a regional enterprise hub based around innovative aviation related businesses and services. This strategy aims to:

- Maximise the use of the airport assets and its attributes
- Provide for investment in new and innovative business activities to expand the airport business model
- Ensure Sligo Airport grows to a self sustaining business entity within 5 years
- Increase regional employment, enterprise development and innovation

Aligned with this strategy is a strengthening of the board of directors of the Airport. While a review of governance structures is presently taking place, it is likely that at least 3 new directors with expertise in aviation and business will be appointed to the board to support the future transition and growth of the company.

Sligo Airport is seeking a small investment of Opex and Capex to support the actions contained within the Strategic Plan. This is €150,000 in operational support per year for 5 years and €600,000 in capital support for runway reconfiguration works.

Sligo Airport will provide the match funding of 20% for support for operational expenditure from its own resources, resulting in a larger overall investment.

Over a five year period this investment will result in the creation of up to 15 new jobs and generate annual profits for the airport of at least €80 - 100,000, thereby ensuring a sustainable financial footing.

7. RECOGNISING SLIGO AS A REGIONAL AIRPORT

There is no doubt that Sligo should be recognised as a Regional Airport under the Regional Airports Programme 2020 – 2024 based on its status as a key regional asset and on the basis of ensuring equitable treatment and consideration for all operational airports.

The case for recognition of Sligo as Regional Airport is based on a precedent set with Waterford Airport. Similarly to Waterford Airport and given the similar sizes and activities performed, Sligo Airport requires a level of operational support. Such support will give Sligo Airport the flexibility and confidence to broaden thinking and innovation, leading to a more robust and self sustaining business model and Airport. This would place Sligo and Waterford on equal footings as in the case of Waterford where funding was awarded to support the airport to stay operational while they develop plans for substantial future development. In the case of Sligo Airport such funding will allow it to implement and drive forward the business development and expansion aspects of its strategic plan, most notably in the areas of:

- Expanding the range and scope of General Aviation services and businesses located at the airport
- Development of an aviation services and ground services training school
- Support to offshore and onshore renewable energy and exploration activity
- Research, development and testing in the UAV sector

INEQUALITY OF TREATMENT

Under the new Regional Airports Programme 2020 – 2024, Sligo Airport request that airports of similar size and operational status are treated equally. It is acknowledged that Waterford Airport was included in the current 2015 – 2019 programme on the basis that it operated commercial flights until June 2016. It is noted that during that period, Waterford Airport:

- In 2015, received a total of €1,139,030 in both OPEX and PPR – O operational aid and €776,125 in Capex aid.¹
- In 2016, received a total of €1,020,215 in both OPEX and PPR – O operational aid.¹
- €750,000 was awarded in 2018, comprising two emergency payments in 2018 to ensure a continuation of Search and Rescue operations while a review of its future was under consideration.²

Since mid-2016, Waterford Airport exists in the same operational circumstances as Sligo Airport, (A SAR base with no commercial flights).

The awarding of significant levels of funding for Opex, PPR-O expenditure and Capex in 2016 and a €750,000 subvention to support the continuation of the SAR services confers on Waterford a favourable status in terms of commercial advantage and distorts competition and the economic playing field between airports, most especially between Sligo and Waterford.

¹ Preparation of New Regional Airports Programme 2020 – 2024 – Issues Paper for Consultation, Department of Transport, Tourism and Sport, August 2019

² A Review of the Regional Airports Programme – Irish Government Economic and Evaluation Services, August 2019 – Page 5

In June 2019 a decision was taken by Government approving in principle, an amount of €5 million of Exchequer funding towards the cost of a €12 million runway extension at Waterford Airport with a number of conditions attached.³

Waterford is classed as a Regional Airport in the new Regional Programme consultation paper. Since Waterford Airport has the same status as Sligo in operational terms, it is therefore relevant and appropriate that Sligo Airport is classified as Regional Airport for the Regional Airports Programme 2020 – 2024.

COMPARATOR PERFORMANCE

A review of the comparative performance of Sligo and Waterford Airport across a number of metrics since 2016, show interesting and disparate results. The comparison is presented as both airports are of similar size and offer the same services (SAR base, hangarage, fuel sales)

	Year 2015		Year 2016		Year 2017	
	Sligo	Waterford	Sligo	Waterford	Sligo	Waterford
Total Income	€1,113	€1,722	€1,098	€1,530	€1,219	€1,266
Operating Profit (Loss)	(€138)	(€1,440)	(€72)	(€1,373)	(€33)	(€902)
No. of Staff	18		18		16	28

Figures stated in 000's

The table shows the superior operational and efficient performance of Sligo Airport. For 2017, the first full year where both airports operated at similar activity levels, Sligo made a small operating loss of €33,000 compared to €902,000 in Waterford.

JUSTIFICATION FOR INCLUSION OF SLIGO UNDER NEW PROGRAMME

The National Planning Framework recognises that Ireland's airports including the regional airports are "a key infrastructure for national and regional development".

State intervention must always be justified on the basis of "market failure". The Review of the Regional Airports Programme in August 2019⁴ cites that the rationale for aid arises on two counts:

- 1) Lack of suitable alternative modes of transport
- 2) Economies of Scale

Economies of Scale

Since Waterford have no commercial flight services, the Economies of Scale case must have been used to justify investments in 2018 and the proposed investments announced in 2019. On this basis it is clear that Sligo Airport should qualify on the same grounds for:

- 1) Operational aid to support the efficient operation of an SAR base
- 2) Capex to support necessary investments in runway reconfiguration as key safety enhancement measures

Such support would allow Sligo Airport:

³ A Review of the Regional Airports Programme – Irish Government Economic and Evaluation Services, August 2019 – Page 5

⁴ A Review of the Regional Airports Programme – Irish Government Economic and Evaluation Services

- The time and resources to meet its future obligations as an EASA certified aerodrome
- The resources to build its capability, business model and economic offering to the region by creating new economic activity and jobs and become self-sustaining within a 5 year period.

Examining the cost of such investments on a per capita basis, based on the population in the 30 minute drive catchment of Sligo and Waterford shows the following:

	Waterford	Sligo
30 Minute Drive Catchment Population	88,348	62,000
Opex aid 2018	€750,000	€0
Aid per Capita	€8.48	€0
Opex aid since 2015	€2,909,245	€0
Aid per Capita	€32.92	€0
Sligo - Requested Opex Aid 2020 – 2025		€750,000
Aid per Capita 2020 – 2025		€12.09
Sligo – Requested Capex Aid 2020 – 2025		€600,000
Aid per Capita 2020 – 2025		€9.67

Sligo is requesting that an operational aid amount of €150,000 per year for 5 years and €600,000 in Cap ex for runway reconfiguration. The amount of Opex per capita over 5 years is €12.09, slightly more than the total Opex aid awarded to Waterford Airport per capita in 2018 alone.

This demonstrates significant value for money and operational efficiencies delivered by Sligo Airport. Sligo Airport will use the support to implement and deliver on its 5 year strategy aimed at generating new aviation related revenue streams at the airport, delivering new jobs, regional economic activity and a sustainable business entity going forward. The capital investment will ensure future compliance with all EASA standards.

Lack of Suitable Alternative Modes of Transport

The 2010 Value for Money Review of the Regional Airports Programme noted that, Waterford is the only provincial city that would have a 2-hour surface journey time to a State Airport. This is not correct as Sligo, as a provincial city and Regional Growth Centre is more than two hours' drive from any state airport. In fact it is further from any state airport than Waterford. While Sligo is less than 1 hour drive from Ireland West Airport, it needs to be noted that Ireland West Airport is not a state owned and operated airport. Ireland West Airport has quality connections mainly to the UK, but it does not offer the same range, frequency and extent of international connections as the 3 state airports of Dublin, Cork and Shannon. Therefore it is not reasonable that Waterford is placed in a favourable position when it comes to considering the connectivity issues in relation to grant aid to regional airports. Sligo in this respect is much more disadvantaged, given its location in the North West, lesser quality of road and public transport connections and distance from state airports. For example Sligo does not have a full motorway link to Dublin and is located 214 km from Dublin Airport versus 176 km for Waterford.