

File With \_\_\_\_\_

## SECTION 131 FORM

Appeal NO: ABP 314485

TO: SEO

Defer Re O/H ☐Having considered the contents of the submission dated/ received 14/12/24  
fromFTA Ireland I recommend that section 131 of the Planning and Development Act, 2000  
be/not be invoked at this stage for the following reason(s): no w 285 wE.O.: [Signature]Date: 16/12/24

To EO: \_\_\_\_\_

Section 131 not to be invoked at this stage. ☐Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.: \_\_\_\_\_

Date: \_\_\_\_\_

S.A.O.: \_\_\_\_\_

Date: \_\_\_\_\_

M \_\_\_\_\_

Please prepare BP \_\_\_\_\_ - Section 131 notice enclosing a copy of the attached  
submission

to: \_\_\_\_\_

Allow 2/3/4 weeks – BP \_\_\_\_\_

EO: \_\_\_\_\_

Date: \_\_\_\_\_

AA: \_\_\_\_\_

Date: \_\_\_\_\_

File With \_\_\_\_\_

**CORRESPONDENCE FORM**Appeal No: ABP 314485-23

M \_\_\_\_\_

Please treat correspondence received on 14/12/24 as follows:

1. Update database with new agent for Applicant/Appellant \_\_\_\_\_

2. Acknowledge with BP 233. Keep copy of Board's Letter ☐

1. RETURN TO SENDER with BP \_\_\_\_\_

2. Keep Envelope: ☐3. Keep Copy of Board's letter ☐**Amendments/Comments**

FTA resp to draft decision

L/D 23/12

\* @ Scan

**4. Attach to file**(a) R/S ☐(d) Screening ☐(b) GIS Processing ☐(e) Inspectorate ☐(c) Processing ☒RETURN TO EO ☐

	Plans Date Stamped <input type="checkbox"/>
	Date Stamp Filled in <input type="checkbox"/>
EO: <u>[Signature]</u>	AA: <u>F. Khattipon</u>
Date: <u>16/12/24</u>	Date: <u>17/12/24</u>

Lita Clarke

Janes.  
314485

**From:** Aidan Flynn <aflynn@ftai.ie>  
**Sent:** Saturday 14 December 2024 07:47  
**To:** Appeals2  
**Subject:** F20A/0668 - Case Number: ABP-314485-22  
**Attachments:** FTAI ABP Submission Final 13.12.24.pdf; an bord pleanala letter sept24 - draft recommendation.pdf

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

To Whom It May Concern

FTA Ireland attach our observation to the draft decision, A proposed development comprising the taking of a 'relevant action' only within the meaning of Section 34C of the Planning and Development Act 2000, as amended, which relates to the night-time use of the runway system at Dublin Airport. Dublin Airport, Co. Dublin for your consideration.

Please confirm that the submission by email is acceptable and will be considered and we do not have to make a submission via the online observation process ( <https://online.pleanala.ie/en-ie/planning-appeals/observation?g=314485> )

Thanks and regards

Kind Regards

**Aidan Flynn**

Chief Executive Officer  
Freight Transport  
Association Ireland



[www.ftai.ie](http://www.ftai.ie)

X: @newsfromftai.ie

Mobile: 0873546954

[www.ftai.ie/our-standards-2](http://www.ftai.ie/our-standards-2)

[www.ftai.ie/training-services](http://www.ftai.ie/training-services)

[www.ftai.ie/tachograph-analysis](http://www.ftai.ie/tachograph-analysis)

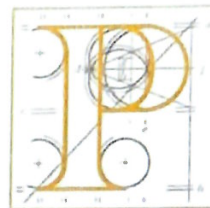
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Our Case Number: ABP-314485-22  
Planning Authority Reference Number: F20A/0668



An  
Bord  
Pleanála

FTA Ireland  
Unit 1, DHL Building  
Airport Business Park  
Cloghran  
Swords  
Co. Dublin

Date: 16 September 2024

Re: A proposed development comprising the taking of a 'relevant action' only within the meaning of Section 34C of the Planning and Development Act 2000, as amended, which relates to the night-time use of the runway system at Dublin Airport.  
Dublin Airport, Co. Dublin

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer to the above-mentioned appeal.

The Board has made a draft decision under Section 37R of the Planning and Development Act, 2000 (as amended).

In accordance with Section 37R (4) (c) (i) (ii) of the Planning and Development Act, 2000 (as amended), you are invited to make any submissions or observations that you may have in relation to the draft decision and the related report **on or before 23rd December 2024**.

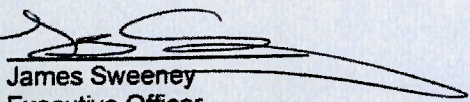
Enclosed is a copy of the draft decision.

Please be advised that the draft decision and the related report may be viewed/downloaded on the An Bord Pleanála website at <https://www.pleanala.ie/en-ie/case/314485>

The Board cannot consider comments that are outside the scope of the matter in question. Your submission may be sent to the offices of the Board at An Bord Pleanála, 64 Marlborough Street, Dublin 1, D01 V902 or by email to [appeals@pleanala.ie](mailto:appeals@pleanala.ie).

Please quote the above appeal reference number in any further correspondence

Yours faithfully,

  
James Sweeney  
Executive Officer

Tel	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

Planning Reference: F20A / 0668

Date: December 2024

Re: Bord Pleanála Case reference: PL06F.314485<sup>1</sup>



### About Freight Transport Association Ireland (FTA Ireland)

Freight Transport Association Ireland (FTA Ireland) is a not-for-profit membership trade association for the Irish freight, passenger and logistics industries. Established in Ireland in 2010, we are wholly owned and governed by our members and act solely in advancing their best interests. FTA Ireland represents some of the largest freight distribution logistics and passenger operators in Ireland, with more than 25,000 employees.

### Executive Summary of FTA Ireland Response

FTA Ireland, on behalf of its members (DHL Express, FedEx and UPS), welcome the opportunity to make a submission to the consultation on the draft decision by An Bord Pleanála (ABP) on Case Number: ABP-314485-22 /Planning Authority Reference Number: F20A/0668. We have serious concerns as to the process followed in proposing a new 13,000 ATM limit in addition to the noise quota system (NQS) which will have a significant impact to the express cargo industry and the Irish economy as a whole. We believe that the required process as set out in the Aircraft Noise (Dublin Airport) Regulation Act, 2019 has not been adhered to and this has then resulted in a decision with serious consequences for our members who will be disproportionately impacted by the decision.

- **ATM Calculation:** As well as critical errors relating to process, there are errors in understanding, calculation and interpretation of submitted application documents in how the 13,000 ATMs was calculated.
- **ANCA and Fingal County Council (FCC) Decision** The draft movement condition runs contrary to the previous findings of ANCA and FCC, neither of which sought to include a movement limit.
- **Balanced Approach:** In particular, the proposal appears inconsistent with Regulation (EU) 598/2014 on noise management at airports, which requires, among other things, that operating restrictions at an airport should *"not be applied as a first resort, but only after consideration of the other measures of the Balanced Approach."*
- **U.S. – EU Air Transport Agreement (ATA):** This highlights the importance of evaluating the effects of proposed environmental measures on the traffic rights of US carriers and consideration of mitigating measures to limit harm and explicitly requires the Parties to adhere to the Standards adopted by ICAO (such as those in Annex 16 to the Chicago Convention)<sup>2</sup> which we do not believe has been taken into consideration.

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<sup>1</sup> [314485 | An Bord Pleanála](#)

<sup>2</sup> See, Article 15(2) and 15(3) of the ATA.



- **Comparison to London Airports:** The report draws false equivalencies between the massive London airport system, with six airports and Dublin, with one. They are not comparable in size or complexity and historic interference in economic development imposed on cargo carriers through the Traffic Distribution Rules.
- **Impact to Express Cargo Industry:** Express cargo is flown at night out of necessity rather than choice and arrivals after 0600hrs will cause enormous damage to our industry, resulting in delays to packages reaching customers.
- **Supply Chain Disruption:** Many supply chains across a range of industries depend on the timely arrival of material consistently day after day. This will impact each of our members' operational networks, which will have knock on effects to the entire supply chain, increasing cost to their business and how they serve their customers.
- **Impact to Irish economy, competitiveness, employment and investment:** - Irish businesses will be less competitive if they are not able to receive or send goods as quickly and efficiently as their EU counterparts, which will have negative consequences for Ireland Inc. as a location of investment. With a reduction of operations at the airport at night, this will result in significant job losses across the entire airport as well as wider business community.

#### **Full Consultation Response**

We are disappointed with An Bord Pleanála's Draft Decision Case Number: ABP-314485-22 which agreed with daa's proposal to replace Condition 5, that restricted night movements to 65, with a noise quota scheme but also introduced a 13,000 annual night movement limit. These decisions seem to be contradictory, and the new limit will be even more restrictive than the current cap of 65-night movements. We request that An Bord Pleanála fundamentally reexamine their process and decision to ensure that the correct process is followed including proper consideration of the requirement for the operating restriction and noise mitigation measures as set against the adopted Noise Abatement Objective (NAO), otherwise the conditions imposed will have a disastrous impact not only on the express freight industry but to the wider Irish economy and its global competitiveness.

FTA Ireland members have supported the proposed adoption of a Noise Quota System (NQS) as a way to address the problematic planning conditions adopted in 2007, which were inconsistent with Ireland's international obligation even then. The NQS as proposed was a forward-looking way to manage noise while accounting for growth and was accepted by the local planning authority as well as ANCA (noise regulator).

The proposed (if implemented) 13,000 ATM limit will be an extreme reduction of the annual nighttime movements and will have a negative effect on our members' business operations at Dublin airport, and by extension to connectivity in the wider country. ***The net effect of which would be to limit the number of movements to an annual average of 35 per night (11.30-07.00)***, where currently there are approximately 120 movements per night during the summer season. Depending on interpretation, this could mean an average of between 41-42 per night during the summer and between 26 - 27 per night during winter or an average of c.99 per night during the 92- busy summer period and c.14 per night during the balance of the year. There are a number of calculation errors in the workings whereby this number was arrived at.





The uncertainty caused by this issue is having an ongoing negative impact on Ireland's supply chain. Critical to a continued and efficient air freight service for Ireland, is night flying.

***Integrated Express Cargo service providers must be accommodated within any framework that imposes night flight limitation.*** All-cargo flights account for approximately less than 15% of the total movements in the night period (based on S25 numbers), yet the value we bring to the wider economy is much more significant. Air Freight makes a very valuable contribution to the Irish Economy, with cargo night flying supporting €1.1 billion in GDP and 15,000 jobs<sup>3</sup>. Freight flown at night accounts for 38% of the total freight volumes at Dublin airport and around 63% of night air cargo is transported by express freight operators primarily shipping sensitive goods. Operating during the night hours is essential, as it enables deliveries to occur at the start of the working day, therefore maximising productivity for thousands of organisations across Ireland.

**We make the following points for consideration:**

1. **The draft movement condition runs contrary to the finding of the ANCA and Fingal County Council Decision** – neither of which sought to include a movement limit.
  - a. The 13,000-movement cap limit will have a disproportionate impact on express cargo operators who fly at night out of necessity, rather than choice, and will have wider implications for Ireland's economic growth and international competitiveness and must be removed. **The final decision must focus solely on the proposed Noise Quota Scheme as presented.**
  - b. There are serious concerns as to the process followed and the resulting decision. The required process as set out in the Aircraft Noise (Dublin Airport) Regulation Act, 2019, has not been adhered to and this has then resulted in a decision with serious consequences for the Applicant and all users of the Airport.
  - c. As well as critical errors relating to process, there are errors in understanding, calculation and interpretation of submitted application documents. We do not understand how the 13,000 ATMs was arrived at as this would require an 'Average' QC of 1.25 per aircraft to reach the approved limit of 16,260. That is 150% of the average QC during the representative day. This proposal is regressive and punitive. ***(Please see: Appendix 1, details all the flights operating to / from Dublin airport on a representative night during S24 between the hours of 2300 and 0659.)***

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<sup>3</sup> <https://ftai.ie/wp-content/uploads/2023/05/Air-Cargo-Night-Flying-FINAL.pdf>



2. **Balanced Approach:** When considering the introduction of noise-related operating restrictions on air carriers, the Irish Government is bound to follow the **Ireland** ICAO Balanced Approach to Aircraft Noise Management (the “Balanced Approach”). As FTA Ireland and our members in their own submissions have noted throughout the planning processes regarding the proposed modifications, a proposed reduction of operations appears to be incompatible with EU Internal Market principles and may violate EU Regulations. In particular, the proposal appears inconsistent with Regulation (EU) 598/2014 on noise management at airports, which requires, among other things, that operating restrictions at an airport should “not be applied as a first resort, but only after consideration of the other measures of the Balanced Approach.” The proposal here is also inconsistent with Irish obligations under Annex 16 to the Chicago Convention, which precede problematic planning condition that the NQS is meant to address by many years.<sup>4</sup>

#### **BLANCED APPROACH INFORMATION**

Ireland, as a signatory to the Chicago Convention, should adhere to the ICAO Balanced Approach before introducing any operating restrictions to address noise-related concerns at Dublin airport.

The Balanced Approach, as defined by ICAO, involves identifying the noise problem and analysing measures to reduce noise across four pillars: 1) reduction at source, 2) land-use planning and management, 3) noise abatement operational procedures, and 4) operating restrictions. We strongly suggest thoroughly assessing the impact and cost effectiveness of potential measures in Pillars 1-3 of the ICAO Balanced Approach before any further consideration is given to implementing any additional operational restrictions in Pillar 4, which should be viewed as a last resort.

Additionally, any measure should be gradually introduced, providing sufficient time to adapt to new conditions, and consider reasonable solutions for the sector, among others by taking into account the state of technology, grandfathering provisions, and long-term operational planning security.

Under the Balanced Approach, government authorities are required to identify and analyse the noise problems at an airport to support identification and evaluation of available options to identify the most suitable measure or combination of measures to mitigate a specific noise problem. The documentation does not demonstrate that An Bord Pleanála has applied the “**balanced approach**” appropriately as it has considered only the health impacts and not any of the four pillars of the Balanced Approach required before implementing operational restrictions.

3. **U.S. – EU Air Transport Agreement (ATA)** – In addition to the obligation undertaken by Ireland as an EU Member State to apply the Balanced Approach prior to implementing operational restrictions, the U.S.-EU ATA highlights the importance of evaluating the effects of proposed environmental measures on the traffic rights of US carriers and consideration of mitigating measures to limit harm and explicitly requires the Parties to adhere to the Standards adopted by ICAO (such as those in Annex 16 to the Chicago Convention).<sup>5</sup> There is no demonstration at any point in this process that the Irish Authorities have met their obligations to U.S. carriers under Article 15 of the ATA.
- a. **Article 15 of the U.S.-EU air transport agreement (ATA)** explicitly requires the Parties to adhere to the Standards adopted by ICAO, such as those in Annex 16 to the Chicago

<sup>4</sup> The ICAO Balanced Approach to Aircraft Noise Management is codified in Part V of Annex 16, Volume I to the Chicago Convention, and was adopted by the 33<sup>rd</sup> ICAO Assembly in 2001, several years before the. See, ICAO Resolution A41-20 (2001).

<sup>5</sup> See, Article 15(2) and 15(3) of the ATA.





Convention. Like Regulation 598/2014, the U.S.-EU ATA obliges the Irish government to ensure that operating restrictions adopted are *"not more restrictive than necessary in order to achieve the environmental objective established for a specific airport."*

In addition, Ireland is obligated to provide a *"fair and equal opportunity to compete"* under the U.S.-EU ATA.<sup>6</sup> The drastic competitive effects that the proposal will impose on carriers that operate only during the night, such as express cargo operators, raises questions of fundamental fairness. Express carriers operate at night in order to meet the needs of Irish importers and exporters that require overnight connectivity to the worldwide economy. Our members move goods critical to the healthcare and manufacturing industries and operate at night out of necessity to connect to their hub operations. Not only will the proposal have a significant impact on the wider Irish economy, but it also targets carriers whose business model relies on nighttime operation. Freight flown at night accounts for 38% of the total freight volumes at Dublin airport and around 63% of night air cargo is transported by express freight operators primarily shipping sensitive goods. Operating during the night hours is absolutely essential, as it enables deliveries to occur at the start of the working day, therefore maximising productivity for thousands of organisations across Ireland. However, the two planning conditions as currently proposed, are not conducive to this activity. In fact, if implemented, they will significantly and, to the detriment of the Irish supply chain and economy, impact air freight services to Ireland.

4. **London Comparison** - The report draws false equivalencies between the massive London airport system, with six airports and Dublin, with one. They are not comparable in size or complexity and historic interference in economic development imposed on cargo carriers through the Traffic Distribution Rules. Furthermore, the implementation of caps and quotas within that system have created a reduction in cargo connectivity and unduly supported growth of passenger carrier operation. Critical to a continued and efficient air freight service for Ireland, is night flying. The proposal further interferes with basic competition in that express carrier rely both on their own-aircraft operations and contracts with combination (i.e., passenger) carrier to meet the full scope of delivery needs of our customers. Allowing increased daytime flying while drastically reducing nighttime operations not only deprives Irish importer and exporters of worldwide connectivity, it places combination carriers in a stronger negotiating position vis-à-vis the express carriers with whom the both compete and collaborate to serve the Irish market.
5. **Impact to Ireland** - Air Cargo is an essential element of Ireland's global supply chain that supports jobs and encourages foreign direct investment. Air cargo and particularly night flying accommodates the following:
  - a. Enables trading relationships.
  - b. Makes Ireland more attractive place to do business.
  - c. Supports advanced logistics and supply chain functions.
  - d. Means Irish based companies can provide the highest levels of customer care and after sales service.
  - e. Air cargo supports consumer choice.

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<sup>6</sup> See, Article 3 of the ATA.



If the sector is significantly restricted from flying at night this will severely impact the express industry with wider implications across the supply chain and Irish economy including:

- **Major disruption to supply chains** – this will impact each of our members' operational networks, which will have knock on effects to the entire supply chain, increasing cost to their business and how they serve their customers.
- **Reduced Competitiveness** - Irish businesses will be less competitive if they are not able to receive or send goods as quickly and efficiently as their EU counterparts, again increasing costs and impacting competitiveness.
- **Reduced Investment** - Negative consequences for Ireland Inc. as a location of investment.
- **Reduced Employment** - Significant job losses across the entire airport as well as wider business community.
- **Increased congestion** - If goods cannot get in in time for AM delivery it may come by road transport, if at all, resulting in more trucks on road, more congestion and an impact on the environment.

Finally, the proposal makes no mention of how the decision should be made to reduce nighttime operations by nearly 60%. Without clear criteria provided to stakeholders, including the carriers and the airport, it is unclear how the Irish government will meet its obligations to provide a fair and equal opportunity to compete to U.S. carriers.

Our submission highlights key irregularities contained within ABP's draft decision that must be rectified to preserve Ireland's aviation sector competitiveness. In our view the proposed restriction on North Runway use as set out in the proposed movement limit as set out in condition 5 are neither justified nor required to achieve the NAO, and would have catastrophic impact on operations at Dublin Airport, and we ask that they are removed.

Recommendations have been made by the Airport Noise Competent Authority (ANCA), body responsible for determining the noise objective, in regard to the replacement of the 65-night flight movements cap with a NQS. On behalf of our members, we strongly suggest maintaining this line of action, in order to avoid any kind of additional annual night movement limit, similar to those implemented in Hong Kong, Warsaw and some UK airports.

We recognise the benefits of the NQS for limiting noise at the designated airports, subject to the completion of a Balanced Approach assessment determining whether operating restrictions are necessary. The NQS is designed to incentivise quieter aircraft rather than capping movements and this should provide operators with flexibility to manage their QC, therefore the NQS should not be combined with a movement limit.

We strongly recommend conducting a cost-effectiveness analysis to ensure all available options under the ICAO Balanced Approach are considered. This cost-effectiveness analysis must include all impacts to the national infrastructure and needs of the entire country, including impact to employment and the wider economy.

**Aidan Flynn**  
**CEO Freight Transport Association Ireland**  
[aflynn@ftai.ie](mailto:aflynn@ftai.ie) [www.ftai.ie](http://www.ftai.ie)



Ireland

## Appendix 1:

This table captures the Quota Count (QC) for each individual movement which averages at a QC of 0.5. Using this average, the Noise Quota System (NQS) with an annual limit of 16,260 (during the impacted hours), as recommended by the Airport Noise Competent Authority (ANCA) would therefore facilitate 32,520 ATM's and require no additional limits applied.

Airline	Aircraft	QC	A/C Type	arr QC	dep QC
HiSky	320	0.25	A300-600 (some tails)	1.00	2.00
Aer Lingus	320	0.25	A300-600 (some tails)	1.00	1.00
Fly One	738	1	B737-300/400	0.50	0.50
Ryanair	73H	0.5	B757(QY/QZ) (some tails)	0.25	0.50
Ryanair	73H	0.5	B757(QY/QZ) (some tails)	0.50	0.50
Ryanair	73H	0.5	B757(D0)	1.00	1.00
TUI Fly Nordic	320	0.25	B777	1.00	2.00
Aer Lingus	320	0.25	B767-300	0.50	2.00
Ryanair	73H	0.5	A321 (some tails)	0.25	1.00
Ryanair	73H	0.5	A321 (some tails)	0.50	1.00
Aer Lingus	320	0.25	B737-800 (some tails)	0.50	1.00
Ryanair	73H	0.5	B737-800 (some tails)	0.50	0.50
Aer Lingus	320	0.25	A330-200/300	0.5	2.00
Aer Lingus	320	0.25			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
HiSky	320	1			
TAP Air Portugal	E95	0.125			
Ryanair	73H	0.5			
Lufthansa	32X	0.25			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
NyxAir	SF3	0.25			
Aer Lingus	320	0.25			
Aer Lingus	320	0.25			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Aer Lingus	320	0.25			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Aer Lingus	320	0.25			
Aer Lingus	320	0.25			
Ryanair	73H	0.5			
Aer Lingus	320	0.25			
Zimex Aviation Ltd	AT7	0.125			
Aer Lingus	320	0.25			
TUI Fly Nordic	320	0.25			
Aer Lingus	320	0.25			
Lufthansa	32X	1			
NyxAir	SF3	0.125			
Zimex Aviation Ltd	AT7	0.125			
Aer Lingus	333	0.5 likely a 0.5 (maximum 1.0 but not a 2.0)			
European Air Transport	75V	0.5			
European Air Transport	73P	0.5			
Aer Lingus	333	0.5			
Fedex	73F	0.5			
UPS Airways	76V	0.5			
Aer Lingus	32Q	0.25			
European Air Transport	32X	0.25			
American Airlines	772	1			
Aer Lingus	332	0.5			
Aer Lingus	32Q	0.25			
Aer Lingus	333	0.5			
Aer Lingus	32Q	0.25 should be a neo			
European Air Transport	73P	0.5			
UPS Airways	76V	2			
Fedex	73F	0.5			
TAP Air Portugal	E95	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Lufthansa	321	1			
American Airlines	789	0.25			
Aer Lingus	320	1			
Ryanair	73H	0.5			
KLM Royal Dutch Airlines	73W	0.5			
TUI Fly Nordic	320	1			
Fedex	76F	0.5			
Aer Lingus	320	1			
Ryanair	73H	0.5			
Air France	223	0.125			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Aer Lingus	32N	0.25 should be a neo			
Ryanair	73H	0.5			
Aer Lingus	320	1			
Aer Lingus	320	1			
Aer Lingus	73H	0.5			
Aer Lingus	320	1			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Aer Lingus	32N	0.25 should be a neo			
Aer Lingus	320	1			
Aer Lingus	320	1			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Ryanair	73H	0.5			
Aer Lingus	320	1			
Aer Lingus	320	1			
Aer Lingus	320	1			
Aer Lingus	AT7	0.125			
Ryanair	73H	0.5			
Aer Lingus	320	1			
Qatar Airways	788	1	0.25 if QR has installed main landing gear plugs		
Aer Lingus	320	1			
Ryanair	73H	0.5			
Ryanair	73H	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		
Aer Lingus	320	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		
Ryanair	73H	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		
Aer Lingus	320	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		
Aer Lingus	AT7	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		
Ryanair	73H	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		
Ryanair	73H	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		
British Airways	AT7	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		
Aer Lingus	AT7	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		
Aer Lingus	32N	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		
Aer Lingus	320	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		
Ryanair	73H	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		
Aer Lingus	320	0	consider taxi time! By the time those flights are on the runway, it's daytime mode		