

✓ FR 31/12

S.37

File With

## SECTION 131 FORM

Appeal No

ABP— 314485-22.

Defer Re O/H

☐

Having considered the contents of the submission dated/received 23/12/24.  
from Jose Duarte Alonso. 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 w w w

Section 131 not to be invoked at this stage.

☒

Section 131 to be invoked — allow 2/4 weeks for reply.

☐

Signed

Don Vragelant

Date

31/12/24.

EO

Signed

Date

SEO/SAO

M

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

Task No

Allow 2/3/4 weeks

BP

Signed

Date

EO

Signed

Date

AA



## Planning Appeal Online Observation

Online Reference  
NPA-OBS-004159

### Online Observation Details

Contact Name  
José Duarte Afonso

Lodgement Date  
23/12/2024 16:21:36

Case Number / Description  
314485

### Payment Details

Payment Method  
Online Payment

Cardholder Name  
José Duarte Afonso

Payment Amount  
€50.00


### Processing Section

#### S.131 Consideration Required

☒ Yes — See attached 131 Form

☐ N/A — Invalid

Signed

  
EO

Date

31/12/24

### Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG— 077029-24

Reason for Refund

Documents Returned to Observer

☐ Yes ☐ No

Request Emailed to Senior Executive Officer for Approval

☐ Yes ☐ No

Signed

EO

Date

### Finance Section

Payment Reference

ch\_3QZENwB1CW0EN5FC0k0iO6Jh

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board  
Member

Date

Date

**Consultation under section 37R6(a) of the Aircraft Noise (Dublin Airport)  
Regulation Act 2019**

Draft Regulatory Decision of An Bord Pleanála dated 11 September 2024 (the “Draft Decision”)

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**Results of the consultation undertaken by daa plc concerning the technical feasibility of, and other alternatives to, the noise mitigation measures or operating restrictions (if any), or the combination thereof, set out in the Draft Decision**

**Draft Conditions** – Conditions 1 and 2 do not contain Noise Mitigation Measures or Operating Restrictions

1. *Development carried out in accordance with plans lodged.*
2. *Aside from the Relevant Action, development must be in accordance with the original permission, as amended in 2019.*
3. *North Runway shall not be used for take-off or landing between 12am and 6am (except in cases of safety, maintenance and adverse weather etc.) NR shall only be used for departure only between the hours of 6am and 8am.*
4. *Airport will be subject to a Noise Quota Count with an annual limit of 16,260 between 11pm and 7am.*
5. *Airport is subject to an annual aircraft movement limit of 13,000 between the hours of 11pm and 7am inclusive. Aircraft movements split between Winter (3,900) and Summer (9,100) to allow for extra flights during the 92-day summer period.*
6. *Relates to the Residential Sound Insulation Grant Scheme (RSIGS) for residential dwellings within the 55dBLnight contour, or dwellings within 50dB Lnight contour who experience a change of +9dB and Residential dwellings or, subject to 80dB Lmax between 11pm and 7am.*

Response on behalf of:

José Duarte Afonso

**TAP AIR PORTUGAL**

**Rua C Do Aeroporto De Lisboa Edif. 25 7.º Sala 732 1700-008 - LISBOA. PORTUGAL**

**Condition 3**

*North Runway shall not be used for take-off or landing between 12am and 6am (except in cases of safety, maintenance and adverse weather etc.) NR shall only be used for departure only between the hours of 6am and 8am.*

1	Comments on technical feasibility
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TAP Air Portugal does not wish to provide any comments on this condition.

2	Comments on alternatives
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TAP Air Portugal does not wish to provide any comments on this condition.

**Condition 4**

*Airport will be subject to a Noise Quota Count with an annual limit of 16,260 between 11pm and 7am.*

1	Comments on technical feasibility
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Night slots reduction will generate a negative economic and social impact, since connectivity and offer will likely decrease. TAP AIR Portugal flights to Dublin provide a gateway to south America, especially relevant to Brazilian diaspora living in Ireland, as well as, providing a feed for south American tourists visiting Ireland.

In fact, related to TP connections in DUB and *considering connecting traffic TP/TP & TP/partners\**:

- TP carries 31% of all SAM pax to DUB (52k pax/year)
- TP cover 53% of the cities in BR connecting to DUB
- In south America TP connects to unique city destinations as FLN, REC, BEL, BHZ, BSB, MCZ, POA, NAT, MAO.

Given the network structure operated by hub-and-spoke carriers, such as TAP Air Portugal, flight schedules are uniquely timed to provide optimum at the carrier hub. This includes the ability to feed the hub with very early inbound connections to long-haul and very late outbound traffic to the spokes. This strategy is highly dependent on a consistent product and flight availability over the course of a week or season.

In TAP network, the availability of Dublin night slots is key to maintain such a network. The implementation of a noise quota could jeopardize such availability on a daily, weekly or seasonal basis.	
<i>*source DDS (OCT24LTM)</i>	
2	Comments on alternatives
<p>Follow the ICAO balanced approach on noise reduction, namely:</p> <ul style="list-style-type: none"> <li>• Incentive system to attract quieter aircraft</li> <li>• Revision of operational procedures to ensure that noise sources are located further away from populated areas (i.e. as being approached by London Heathrow Airport)</li> </ul>	
<p><b>Condition 5</b></p> <p><i>Airport is subject to an annual aircraft movement limit of 13,000 between the hours of 11pm and 7am inclusive. Aircraft movements split between Winter (3,900) and Summer (9,100) to allow for extra flights during the 92-day summer period.</i></p>	
1	Comments on technical feasibility
<p>Night slots reduction will generate a negative economic and social impact, since connectivity and offer will likely decrease. TAP AIR Portugal flights to Dublin provide a gateway to south America, especially relevant to Brazilian diaspora living in Ireland, as well as, providing a feed for south American tourists visiting Ireland.</p> <p>In fact, related to TP connections in DUB and <i>considering connecting traffic TP/TP &amp; TP/partners*</i>:</p> <ul style="list-style-type: none"> <li>• TP carries 31% of all SAM pax to DUB (52k pax/year)</li> <li>• TP cover 53% of the cities in BR connecting to DUB</li> <li>• In south America TP connects to unique city destinations as FLN, REC, BEL, BHZ, BSB, MCZ, POA, NAT, MAO.</li> </ul> <p>Given the network structure operated by hub-and-spoke carriers, such as TAP Air Portugal, flight schedules are uniquely timed to provide optimum at the carrier hub. This includes the ability to feed the hub with very early inbound connections to long-haul and very late outbound traffic to the spokes. This strategy is highly dependent on a consistent product and flight availability over the course of a week or season.</p> <p>In TAP network, the availability of Dublin night slots is key to maintain such a network. The implementation of a noise quota could jeopardize such availability on a daily, weekly or seasonal basis.</p> <p><i>*source DDS (OCT24LTM)</i></p>	
2	Comments on alternatives
Follow the ICAO balanced approach on noise reduction, namely:	

- Incentive system to attract quieter aircraft
- Revision of operational procedures to ensure that noise sources are located further away from populated areas (i.e. as being approached by London Heathrow Airport)

**Condition 6**

*Relates to the Residential Sound Insulation Grant Scheme (RSIGS) for residential dwellings within the 55dB Night contour, or dwellings within 50dB Night contour who experience a change of +9dB and Residential dwellings or, subject to 80dB L<sub>Amax</sub> between 11pm and 7am.*

1	Comments on technical feasibility
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TAP Air Portugal does not wish to provide any comments on this condition.

2	Comments on alternatives
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TAP Air Portugal does not wish to provide any comments on this condition.

	Any further comments
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TAP Air Portugal does not wish to provide any further comments.