

S.37

File With

SECTION 131 FORM

Appeal No

ABP— 314485

Defer Re O/H

☐

Having considered the contents of the submission dated/received 18/12/24
from TUI Group 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 lss

Section 131 not to be invoked at this stage.

☒

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

☐

Signed



EO

Date

20/12/24

Signed



SEO/SAO

Date

M

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

To

Task No

Allow 2/3/4 weeks

BP

Signed

EO

Date

Signed

AA

Date



Planning Appeal Online Observation

Online Reference
NPA-OBS-004111

3840

Online Observation Details

Contact Name
Ian Graney

TU) Group

Lodgement Date
18/12/2024 15:34:21

Case Number / Description
314485

Payment Details

Payment Method
Online Payment

Cardholder Name
Ian Graney

Payment Amount
€50.00

Processing Section

S.131 Consideration Required

☒ Yes — See attached 131 Form

☐ N/A — Invalid

Signed

EO

Date

20/12/24

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—076 305-24

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_3QXPGB1CW0EN5FC1UIXs1iJ

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

TUI Group Consultation Response – 18th December 2024

Response on behalf of: TUI Group, including TUIfly Nordic (BLX) and TUI Airways (TOM)

Mr. Ian Graney - Schedules Strategy and Development Manager
TUI Group
Wigmore House
Wigmore Lane
Luton
LU2 9TN

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”)

Case Number - 314485

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 impact of condition
Limiting the runway usage limits the ability of Dublin Airport and its carriers to fully exploit the additional capacity and operational benefits that the North Runway could otherwise bring to the airport. The North Runway should be made available, to operations through the full 24hours of an operational day.	
2	Comments on alternatives
No comments	
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 impact of condition
A Noise Quota Count (QC) system is a much more pragmatic method of assessing, and controlling night noise generated at an airport, relating directly to the <i>amount</i> of noise created rather than noise occurrences. This better reflects and supports the re-fleeting that many airlines are embarking upon to reduce noise and emissions, and allows for capacity growth alongside fleet developments. Any QC limit should not be set at or below the historic schedule, to allow headroom for operational over-runs, and future schedule growth. TUI would suggest a minimum 20% buffer above the historic schedule as per W24 and S25, both of which are unrestricted seasons (relating to the passenger cap situation). TUI does not believe that the period 0600-0700 (local) should be considered as night operations, this differs from the parameters that airports in the UK operate to, and the 0600h (local) is a peak hour and therefore applying a limit is extremely limiting.	

2	Comments on alternatives
No comments	
Condition 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.	
1	Comments on impact of condition
TUI does not support the continuation of a potential movement-based limit, this is currently significantly below the current historic schedule, and also includes the 06h (local), which is a peak hour for departures. The proposed night period would severely limit operations, potentially meaning carriers cannot operate in a profitable way. The proposed limit makes it impossible to have access to the night at both the start and end of the day, massively limiting carriers ability to schedule short-haul flight effectively (typically 2 return flights from Dublin, per day). We believe that the requirement for a movement limit itself should be reviewed as Tui do not believe that it is necessary along side the QC limits. If it is retained its timings should be reviewed and where appropriate adjusted, to reflect timings typically used at UK airports, and to a movement limit that is above the historic schedule, to provide an operational and growth buffer.	
2	Comments on alternatives
Our overall preference is to support a Quota Count (QC) limit, rather than a movement limit.	
Condition 6 - Relates to the Residential Sound Insulation Grant Scheme (RSIGS) for residential dwellings within the 55dBnight contour, or dwellings within 50dB night contour who experience a change of +9dB and Residential dwellings or, subject to 80dB LAmax between 11pm and 7am.	
1	Comments on impact of condition
TUI does not have any comments regarding this scheme.	
2	Comments on alternatives
TUI does not have any comments regarding this scheme.	
Any further comments	
Any implementation of existing or new night restrictions should not reduce carriers ability to fly in the night versus the current schedule, nor should it restrict the much needed growth that the North Runway provides. The additional runway not only provides opportunity for operational improvements, but provides additional capacity that supports carrier growth, new entrants (stimulating competition), and provides significant economic benefits for the Dublin area and Ireland as a whole, including jobs, supporting local business and both in- and outbound tourism traffic.	