

File With

## SECTION 131 FORM

Appeal No

ABP— 314485-22

Defer Re O/H

☐

To

SEO

Having considered the contents of the <sup>observation</sup> submission dated/received 3/10/22  
 from Aer Lingus 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 new issues raised

Signed



EO

Date

14/10/22

To

EO

Section 131 not to be invoked at this stage.

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

☐  
☐

Signed

SEO

Date

Signed

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

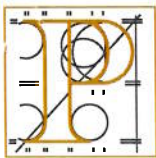
EO

Date

Signed

AA

Date



An  
Bord  
Pleanála

## Planning Appeal Online Observation

### Online Reference

NPA-OBS-001370

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### Online Observation Details

Contact Name

Lisa Keogh

Lodgement Date

03/10/2022 15:19:42

Case Number / Description

Dublin Airport North Runway

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### Payment Details

Payment Method

Online Payment

Cardholder Name

Lisa Keogh

Payment Amount

€50.00

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### Processing Section

S.131 Consideration Required

☒

Yes — P.T.O.

☐

N/A — Invalid

Signed

The Secretary  
An Bord Pleanála  
64 Marlborough St  
Dublin 1

October 3, 2022

**Re: Observation on Dublin Airport North Runway Planning Conditions**

Dear Sir/Madam,

On behalf of Aer Lingus, I wish to submit the following as observations in respect of the Dublin Airport North Runway Planning Conditions (Fingal County Council's reference F20A/0688)

Aer Lingus supports the recent decisions of Fingal County Council, and of the Aircraft Noise Competent Authority in respect of the North Runway. Whilst the operating constraints associated with the North Runway are not ideal from an airline planning perspective, we recognise their alignment with the ICAO balanced approach.

The national economic considerations associated with the original constraints have been well documented as part of the planning application process to date.

The revised decision made by Fingal County Council takes into account the substantial improvement in aircraft noise performance over the last 15 years and introduces a Noise Quota System to further incentivise investment in noise efficient aircraft by based carriers. The Fingal County Council decision importantly applies the ICAO Balanced Approach as incorporated in European Union Legislation (Regulation (EU) No 598/2014). This was unanimously endorsed by ICAO's Assembly in 2001 and provides a transparent process for managing demonstrated noise problems on an airport-by-airport basis and identifying the most suitable solutions to noise issues.<sup>1</sup>

By way of demonstrating such improvements in noise efficiencies, Aer Lingus is investing in new technology aircraft.

The latest renewal of the Aer Lingus short haul fleet commenced in 2022 and is planned to continue over the coming years. The transition to new technology improves the operational, economic and environmental performance of Aer Lingus due to the efficiencies brought about by the latest airframe and power plant design of the A320neo. Compared to its existing A320ceo fleet the new aircraft deliver a significant improvement in sustainability with a 15%-20% reduction in fuel burn, a 20% reduction in CO2 emissions and significant reduction in noise footprint.

The North Atlantic fleet has also seen the transition to new efficient technology which began in 2019, with 8 Airbus 321 NEOs LR already in service, bringing unrivalled fuel efficiency and noise reduction

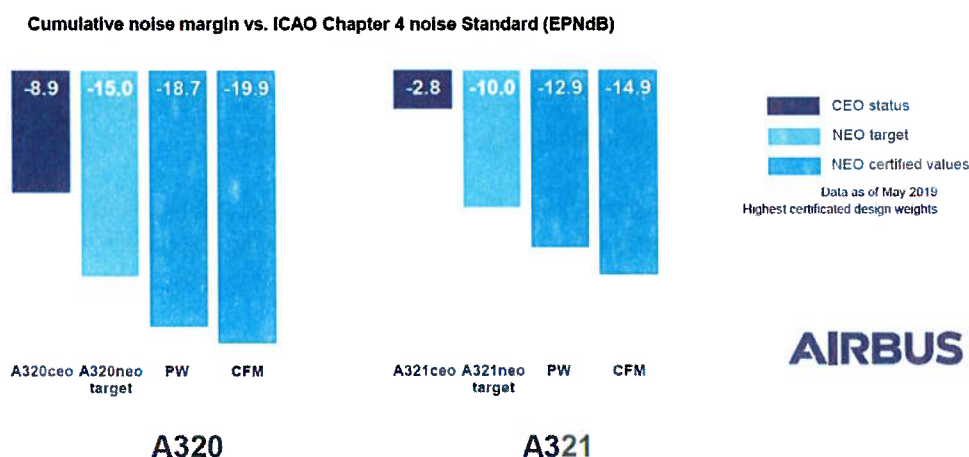
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<sup>1</sup> ICAO Assembly Resolution A39-1, Appendices C and E.

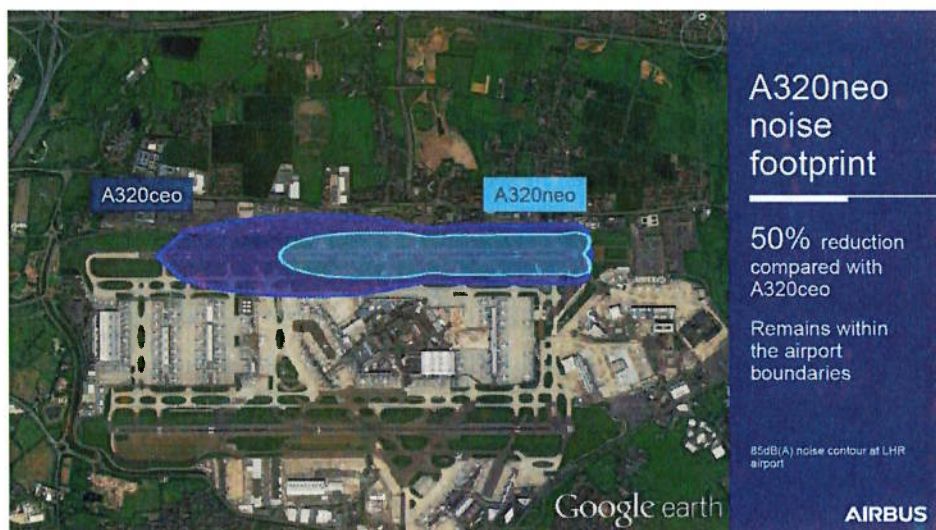
benefits. The transition to new technology will continue with further narrowbody transatlantic units, Airbus 321XLRs, with six units expected to join the fleet across 2024-2025 period.

Airbus 320neo noise margin demonstrates improvement across the whole aircraft family.

- The A320 NEO noise footprint shows a 50% reduction compared with its predecessor.
- Aer Lingus is using CFM engines on our A321 NEOs and the first of our A320 NEOs which maximise the noise efficiencies of the aircraft illustrated in the below chart.



For illustration the 85-decibel noise contour at LHR airport is shown comparing the A320 NEO to its predecessor the A320 CEO and shows its noise contours remaining within the airport boundaries.



Aer Lingus believe that the decision of Fingal County Council should be upheld by An Bord Pleanála. This is critical to: enabling the economic sustainability of existing operations at Dublin Airport;



maintaining the investment in new technology noise efficient aircraft by airlines; and facilitating sustainable future growth at Dublin to the benefit of the Irish economy

Aer Lingus requests that An Bord Pleanála progress their deliberations swiftly to provide the necessary certainty to the Dublin Airport, airport operators, and the wider community.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Niall Timlin".

Niall Timlin

Director of Corporate Affairs