

File With

SECTION 131 FORM

Appeal No

ABP— 314485-22

Defer Re O/H

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To

SEO

Having considered the contents of the ^{observation} submission dated/received 3/10/22
 from FTA 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):

Na 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.

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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

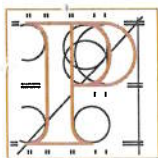
EO

Date

Signed

AA

Date



An
Bord
Pleanála

Planning Appeal Online Observation

Online Reference

NPA-OBS-001367

Online Observation Details

Contact Name

Aidan Flynn

Lodgement Date

03/10/2022 14:48:54

Case Number / Description

314485

Payment Details

Payment Method

Online Payment

Cardholder Name

Aidan Flynn

Payment Amount

€50.00

Processing Section

S.131 Consideration Required

☒

Yes — P.T.O.

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N/A — Invalid

Signed

Bord Pleanála Ref: ABP-314485-22

Date: 3rd October 2022

RE: Register Ref: F20A/0668

FTA Ireland (FTAI) 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. FTAI represents some of the largest freight distribution logistics and passenger operators in Ireland, with more than 25,000 employees.

FTAI made a substantial submission to Fingal County Council in January 2021, expressing our support for the amendment of the two operating conditions attached to North Runway. Within this submission, we outlined the considerable contribution of air freight to the Irish economy – cargo night flying in particular supports €1.1 billion in GDP and 15,000 jobs.¹

Critical to a continued and efficient air freight service for Ireland, is night flying. 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, planning conditions No. 3(d) and No. 5 of the 2007 North Runway Planning Permission as they currently stand, 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 on air freight services to Ireland. Moreover, it is not demonstrated that such implementation of the two planning conditions would be consistent with Irish obligations under European Directive (EC) 2002/30 and the subsequent Regulation (EC) 598/2014 that replaced it. Neither would it be consistent with the obligations of the Government of Ireland under the U.S.-EU Air Transport Agreement (ATA) with regards to U.S. carriers operating in Dublin.

In light of the appeals that have been submitted to An Bord Pleanála in relation to the FCC/ANCA decision to amend the two onerous conditions attached to the grant of planning for North Runway, FTA Ireland want to highlight our support for the regulatory decision of ANCA as outlined below:

The Regulatory Decision of 8 August 2022

The Regulatory Decision of ANCA directs that the Planning Authority include in their planning permission three conditions relating to noise mitigations measures and operating restrictions. These three conditions amend condition 5 of the original planning permission, conditions 3 and introduce as a third condition a voluntary residential sound insulation grant scheme.

FTA Ireland and our members support the regulatory decision

- **To amend condition no. 3(d)** of the North Runway Planning Permission (Fingal County Council Reg. Ref. No. F04A/1755; ABP Ref. No.: PL06F.217429 as amended by Fingal County Council F19A/0023, ABP Ref. No. ABP-305289-19) with
 - 'Runway 10L-28R shall not be used for take-off or landing between 0000 hours and 0559 hours except in cases of safety, maintenance considerations, exceptional air

¹ [Air-Cargo-Night-Flying-FINAL.pdf \(ftai.ie\)](#)

traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports or where Runway 10L-28R length is required for a specific aircraft type.'

- **to replace condition no. 5** of the North Runway Planning Permission (Fingal County Council Reg. Ref. No. F04A/1755; ABP Ref. No.: PL06F.217429 as amended by Fingal County Council F19A/0023, ABP Ref. No. ABP-305289-19) with
 - 'A noise quota system is proposed for night time noise at the airport. The airport shall be subject to an annual noise quota of 7990 between the hours of 2330hrs and 0600hrs'.

We would like to make the following points for consideration by An Bord Pleanála:

Air cargo and particularly night flying accommodates the following:

- Enables trading relationships
- Makes Ireland more attractive place to do business
- Supports advanced logistics and supply chain functions
- Means Irish based companies can provide the highest levels of customer care and after sales service
- Air cargo supports consumer choice.

Finally, it is vital to Irelands reputation and international supply chain links that everything is done to preserve our competitiveness. We have seen during the COVID pandemic the important of Air cargo integrator express cargo services in supplying PPE, ventilators and other essential pharmaceutical goods and equipment around the world. Recent CSO figures² show that the largest category of exports was Medical and pharmaceutical products. Exports of these goods accounted for 38% of all exports, or €62,631 million in 2021. The main facilitator of this is the air cargo freight sector.

We appreciate your consideration of this submission.

Aidan Flynn

CEO

Freight Transport Association Ireland

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² <https://www.cso.ie/en/releasesandpublications/er/gei/goodsexportsandimportsdecember2021/>