

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

## SECTION 131 FORM

Appeal NO: ABP 314688Defer Re O/H ☐

TO: SEO

Having considered the contents of the submission dated/ received 20/12/24  
fromAir Nav 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 lssE.O.: [Signature]Date: 31/12/24To EO: [Signature]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

M \_\_\_\_\_

Please treat correspondence received on 20/12/24 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****4. Attach to file**(a) R/S ☐ (d) Screening ☐(b) GIS Processing ☐ (e) Inspectorate ☐(c) Processing ☐RETURN TO EO ☐Plans Date Stamped ☐Date Stamped Filled in ☐EO: [Signature]

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

Date: 31/12/24

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

## James Sweeney

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**From:** Appeals2  
**Sent:** Friday 20 December 2024 16:33  
**To:** James Sweeney  
**Subject:** FW: Submission by AirNav Ireland on An Bord Pleanála Draft Decision (ABP-314485-22)  
**Attachments:** AirNav Ireland - Submission on ABP Draft Decision (ABP-314485-22) 20122024.docx  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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**From:** Rachel Martin <Rachel.Martin@airnav.ie>  
**Sent:** Friday, December 20, 2024 4:24 PM  
**To:** Appeals2 <appeals@pleanala.ie>  
**Cc:** Annmarie Brogan <Annmarie.Brogan@airnav.ie>  
**Subject:** Submission by AirNav Ireland on An Bord Pleanála Draft Decision (ABP-314485-22)

**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.

Dear Secretary,

Please find attached submission from AirNav Ireland, the Air Navigation Service Provider for Irish controlled airspace and ATC operations at Dublin airport. If you require any further information or would like to discuss the content of the letter, please contact me directly.

Kind regards,

Rachel



**Rachel Martin**

Head of Corporate Affairs & Sustainability | AirNav Ireland

P: (01) 603 1496 M: 087 344 9993

E:

A: The Times Building, 11-12 D'Olier Street, Dublin D02 T449

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na hÉireann  
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hÉireann  
Foirgneamh na hAmanna  
11–12 Sráid D'Olier  
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[www.airnav.ie](http://www.airnav.ie)



Sent by email: [appeals@pleanala.ie](mailto:appeals@pleanala.ie)

The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01 V902

December 20th, 2024

## Re: AirNav Ireland submission on An Bord Pleanála Draft Decision (ABP-314485-22)

Dear Secretary,

AirNav Ireland wishes to submit a number of comments in response to the aforementioned Draft Decision.

The Draft Decision does not follow the global best practice ICAO Balanced Approach to Aircraft Noise Management, which was followed by the Aircraft Noise Competent Authority (ANCA) in its decision, by seeking to impose operating restrictions without first considering the other three preceding elements (1. Reduction of noise at source; 2. Land use planning and management; 3. Noise abatement operational procedures). We request that An Bord Pleanála amends its Decision in line with the Balanced Approach.

The Draft Decision proposes a Condition 3 (e) which seeks to prevent arrivals to Runway 10L/28R between the hours of 06:00 and 08:00 local time. During this crucial period, up to 80 flights typically occur which is critical for maintaining the punctual and efficient operation of aircraft at Dublin Airport. When the parallel runways are being operated in segregated mode (i.e. simultaneously) and the wind is from an easterly direction (25% of the time on average?), Runway 10L is the arrivals runway.

The proposed Condition 3 (e) would reduce available capacity by limiting the airport to south runway operations only, for the period 06:00 – 08:00 when such meteorological conditions prevail. This would lead to considerable flight delays which would disrupt the travel plans of thousands of passengers during the year. It would also result in extended taxi times and increased levels of air holding which would have negative environmental implications. Accordingly, we request that An Bord Pleanála removes proposed Condition 3 (e).

### Bord Stiúrthóirí/Board of Directors

Bryan Bourke (Chairman), Peter Kearney,  
Cian Blackwell, Lourda Moloney  
James O'Loughlin, Eimer O'Rourke  
Aidan Skelly,

### Registered Office:

The Times Building, 11–12 D'Olier Street  
Dublin 2, D02 T449, Ireland  
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A Designated Activity Company

### Oifig Chláraithe:

Foirgneamh na hAmanna, 11–12 Sráid D'Olier  
Baile Átha Cliath 2, D02 T449, Éire  
Uimhir Chláraithe: 734291. Áit Chláraithe: Éire  
Cuideachta Ghníomhaíochta Ainmnithe

The proposed Condition 5, which proposes to impose an annual limit of 13,000 aircraft movements between the hours of 23:00 and 06:59, contradicts the proposed condition 4 which introduces a Noise Quota Scheme (NQS) with an annual Quota Count (QC) limit of 16,260 for that period. The proposed Condition 5 would limit movements during the 92 days summer busy period to an average of 98.9 per day which would place significant limits on growth at Dublin Airport.

Proposed Condition 5 would also lead to a limit of an average of 14.3 flights per night for the remaining 272 days of the year (Dublin Airport is closed on 25th December), which would result in significant reduction in the number of flights currently operated by the airlines at Dublin Airport, thereby reducing consumer choice. It would also cut average daily aircraft utilisation rates which would have implications for the commercial viability of basing aircraft at Dublin. We therefore request that An Bord Pleanála remove the proposed Condition 5, as the control of the number of flights and the associated noise levels is more effectively achieved by the NQS set out in Condition 4.

We thank An Bord Pleanála for its consideration of our comments and requests and remain available to answer any questions or provide further information as required.

Yours sincerely,



Rachel Martin  
Head of Corporate Affairs & Sustainability