

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

## SECTION 131 FORM

Appeal NO: ABP 314685

TO: SEO

Defer Re O/H ☐Having considered the contents of the submission dated/ received 20/12/24  
from DAAI recommend that section 131 of the Planning and Development Act, 2000  
be/not be invoked at this stage for the following reason(s): no a ~~long~~E.O.: [Signature] Date: 2/1/25

To EO: \_\_\_\_\_

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 314485Please treat correspondence received on 20/12/22 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

*Resp*

4. Attach to file

(a) R/S ☐(b) GIS Processing ☐(c) Processing ☒(d) Screening ☐(e) Inspectorate ☐RETURN TO EO ☐EO: *[Signature]*Date: 21/1/25Plans Date Stamped ☐Date Stamped Filled in ☐AA: *[Signature]*Date: 21/1/25

## James Sweeney

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**From:** Appeals2  
**Sent:** Friday 20 December 2024 16:51  
**To:** James Sweeney  
**Subject:** FW: Response to ABP Direction on Draft Decision (PL06F.314485)  
**Attachments:** ABP Ref 314485-22\_daa Airline Engagement\_Issue.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** Leon Ronan <Leon.Ronan@daa.ie>  
**Sent:** Friday, December 20, 2024 4:46 PM  
**To:** Appeals2 <appeals@pleanala.ie>  
**Subject:** Response to ABP Direction on Draft Decision (PL06F.314485)

**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.

A Chara,

Please find attached a submission from daa plc. (the applicant and airport operator) in response to your request to engage with the Irish Aviation Authority and operators of aircraft in the airport, pursuant to subsection 6(a) of section 37R of the Planning & Development Act, 2000 (as amended) in respect of the provisions of the Draft Decision (PL06F.314485) of 11<sup>th</sup> September 2024.

A formal submission to the Draft Decision will follow under separate cover, from our planning consultants Tom Philips and Associates.

Please do not hesitate to contact us with any queries you may have.

Kind regards,

Leon Ronan



.....  
**Leon Ronan | PLANNING & REGULATION**  
Capacity Planning Senior Manager

Dublin Airport  
**M:** +353 87 6591299  
**Email:** [leon.ronan@daa.ie](mailto:leon.ronan@daa.ie)

daa proudly supporting - A Little Lifetime Foundation, Cliona's Foundation and Cork Penny Dinners - our 2024 Charities of the Year. **DISCLAIMER:** The information contained in this email and in any attachments is confidential and is designated solely for the attention and use of the intended Recipient(s). If you are not the intended recipient(s) of this email, you must not use, disclose, copy, distribute or retain this message, the attachment(s) or any part thereof. If you believe that you have received this email in error, please notify us immediately. Please also delete all copies of this email

and any attachment(s) from your computer system. Unless expressly stated, this email is not intended to create any contractual relationship. If this email is not sent in the course of the senders employment or fulfilment of his/her duties to daa, daa accepts no liability whatsoever for the content of this message or any attachment(s). daa plc. Registered office: Dublin Airport, Co. Dublin. Registered Number: 9401 Ireland. SÉANADH: Tá an fhaisnéis sa ríomhphost seo agus i gceangaltáin ar bith faoi rún agus tá sé d'aird agus d'úsáid an Fhreagróra (na bhFreagróirí) dá bhfuil sé ceaptha amháin. Más rud é nach tusa an freagróir (na freagróirí) dá bhfuil an ríomhphost seo ceaptha, ní cheadaítear duit an teachtaireacht, an ceangaltá(i)n nó cuid ar bith dó a úsáid, a nochtadh, a chóipeáil, a scaipeadh nó a choinneáil. Má chreideann tú go bhfuair tú an ríomhphost seo trí earráid, bheimis buíoch dá gcuirfeá é sin in iúl dúinn láithreach. Scríos gach cóip den ríomhphost seo agus ceangaltá(i)n ar bith ó chóras do ríomhaire chomh maith le do thoil. Mura bhfuil sé luaite go sainráite, níl sé beartaithe leis an ríomhphost seo caidreamh conarthach ar bith a chruthú. Murar seoladh an ríomhphost seo i gcúrsaí fhostaíocht an tseoltóra nó i gcomhlíonadh a dhualgas/a dualgas ní ghlacfaidh daa dliteanas ar bith as ábhar na teachtaireachta nó ceangaltá(i)n ar bith. daa cpt. Oifig Chláraithe: Aerfort Bhaile Átha Cliath, Co. Bhaile Átha Cliath. Uimhir Chláraithe: 9401 Éire.

Document Classification: Class 1 - General

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

By email

20<sup>th</sup> December 2024

**Re: Draft Decision of An Bord Pleanála in the appeal on nighttime use of the Runway System at Dublin Airport**

**Your Ref: ABP-314485-22 (FCC Ref. F20A/0668)**

Dear Sir/Madam,

We write concerning An Bord Pleanála's ("ABP") Direction of the 16<sup>th</sup> of September 2024, pursuant to subsection 6(a) of section 37R of the Planning & Development Act, 2000 (as amended) to:

*"(i) engage with the Irish Aviation Authority and operators of aircraft in the airport concerning the technical feasibility of, and other alternatives to, the noise mitigation measures or operating restrictions (if any or the combination thereof, the subject of the draft decision". And to "(ii) to inform the Board of the outcome of those discussions".*

We confirm that we engaged both the Irish Aviation Authority ("IAA") and operators of aircraft at Dublin Airport (the 'airlines') in the following ways to facilitate discussion on the draft Decision:

- **06<sup>th</sup> of November:** daa circulated the ABP weblink to the Draft Decision and associated documents, to all airlines. Parties were invited to attend two online meetings in which the Draft Decision would be discussed pursuant to the Direction of the Board.
- **22<sup>nd</sup> of November and 16<sup>th</sup> of December:** Bilateral engagement with the IAA.
- **27<sup>th</sup> of November:** daa facilitated a meeting in which a presentation on the Draft Decision was given by planning consultants, Tom Philips and Associates, providing:
  - a) An overview of the history of the proposal and the terms of the Draft Decision.
  - b) An outline of what is required of daa and Aircraft Operators in terms of the Direction of the Board (i.e. the provisions of s.37R(6) of the PDA).

- c) Advised that a questionnaire would be circulated in which airline views could be captured as part of the engagement process on the technical feasibility of, and other alternatives to, the noise mitigation measures or operating restrictions (if any), or the combination of the Draft Decision

A discussion session with all attendees was then facilitated.

- **9<sup>th</sup> of December:** daa facilitated a follow up discussion with all parties.
- **03<sup>rd</sup> of December:** Circulated a Consultation Survey Form to gather views of airlines on the measures outlined in the Draft Decision

The minutes of the above engagement meetings are appended to this letter, informing ABP of the outcome of these discussions. We also attach the questionnaire responses received from a number of attendees.

At all discussion sessions, it was highlighted that submissions could be made directly to ABP on the Draft Decision on or before the 23<sup>rd</sup> of December. Many attendees expressed their preference to avail of this option to formally make their views known.

We look forward to further opportunities to engage in the process and to the final Regulatory Decision of the Board in due course.

Kind regards,

*J Roche*

**Head of Planning**

daa plc.

### **Appendices**

- Appendix 1 - Airline Consultation Meeting 1 27112024 Minutes
- Appendix 2 - Airline Consultation Meeting 2 09122024 Minutes
- Appendix 3 - DAA IAA Meeting 16120224 Minutes
- Appendix 4 - 20241216 - RA Consultation Survey Form for airlines views QR
- Appendix 5 - 20241220\_RA Consultation Survey Form for airlines views\_I2\_IB
- Appendix 6 - RA Consultation Survey Form for airlines views - TUI (TOM BLX)
- Appendix 7- 20241220 RA Consultation Survey Form for airlines views\_Vueling Reply
- Appendix 8 - RA Consultation Survey Form for airlines views - UPS
- Appendix 9 - RA Consultation Survey Form for airlines views\_BA BACF response 20Dec24
- Appendix 10 - RA Consultation Survey Form for airlines views-EA

**Appendix 1 - Airline Consultation Meeting 1 27112024 Minutes**

## Meeting Minutes

**Meeting:** Airline engagement between Dublin Airport & Aircraft Operators re Draft Regulatory Decision (relating to the night-time use of the runway system)

**Date:** 27<sup>th</sup> November 2024.

**Time:** 14:30 Dublin Time.

**Location:** Dublin Airport & Online on Microsoft Teams

### Attendees: As Below:

Name	Organisation	Name	Organisation
Leon Ronan	DAA	Jane Roche	DAA
Ashling Dunne	DAA	Stephanie Boutin	Air Transat
Simon Fagan	DAA	Laurence Gourley	Aer Lingus
Eoin McGloughlin	DAA	Conor McAuliffe	United Airlines
Joshua Grafman	JetBlue	Gavin Lawlor	Tom Phillips + Associates
Stuart Aveline	British Airways	Leon Ceelen	KLM Royal Dutch Airlines
Gaynor Southan	British Airways	Ciaran Smith	Emerald Airlines
Andrew Somerville	Swiss International Airlines	Brian Minogue	Tom Phillips + Associates
Brian Hedberg	FedEx	Valentin Meurice	Luxair
Peter Hickisch	DHL	Philipp Kummer	DHL
Bradie Manning	Ryanair	Chris Springer	Jet2
Christina Narli Sitohang	Qatar Airways	Keith McEvoy	Airnav Ireland
Stefan Neweling	Ups	Michele Boyce	United Airlines
Eoin Doyle	Aer Lingus	Volker Wackernagel	Air Canada
Micha Hofmann	Ups	Steve Birch	DHL
Nicola Somers	Ryanair	Kealy, Eoin	Ryanair
John Marquet	Delta Airlines	Mike Farrell	DHL
Noah Neis	American Airlines	Francesco Spadafora	Air France
Ed Domaracki	United	Terry Symmans	Airnav Ireland
Alexandra Fourn	Air France	Ulrike Steinmann-Schudra	DHL
Rory Graham	Jet2	Isabel McCarthy	DHL
Sarah Bell	Ups		



Simon Fagan (SF), Head of Planning and Economic Regulation for DAA, opened the meeting and reminded the attendees that the meeting is a requirement for the airport under the Planning and Development Act, 2000 (as amended by the Aircraft Noise (Dublin Airport) Regulation Act, 2019). SF then reminded the attendees of the various conversations and meetings that have occurred over the last several months and noted that the topic of this meeting was not to discuss the passenger cap.

SF handed over to Brian Minogue (BM) of Tom Phillips + Associates, who took the participants through a presentation explaining the draft regulatory decision of An Bord Pleanála and the issues which were pertinent to the Airline and Airport operating community. *(see slides shared for details)*

An opportunity for discussion of the draft regulatory decision was then facilitated, including technical feasibility of and alternatives to the draft operating restrictions. All participants/attendees were invited to make comments and ask questions.

Laurence Gourley (LG) Aer Lingus, asked if An Bord Pleanála was to consider an alternative movement limit, would it need to consult on that again before finalising the decision, and in terms of regulation 598 process, do you think the board can rectify any failure to comply between now and it's final decision or is it already flawed because of a failure to comply with Regulation 598.

Gavin Lawlor (LG) Tom Phillips + Associates, responded by suggesting that he is of the view that it is likely that the board will need to consult again in order to go back and do the process, in line with their legal obligations.

Stuart Aveline, British Airways, requested that slides be circulated after the meeting.

BM confirmed, slides, minutes and the proforma response form will be sent out to all participants.

Leon Ronan (LR) DAA, stated that any participants who have further queries should communicate them to him and they will be collated ahead of the next meeting, where all queries could be addressed.

GL noted that all airlines have an opportunity to provide submissions to An Bord Pleanála independently of the airport consultation and noted that any submissions, made as part of this consultation would be on public record.

**The meeting concluded at 15:30pm.**

## **Appendix 2 - Airline Consultation Meeting 2 09122024 Minutes**

## Meeting Minutes

**Meeting:** Airline engagement between Dublin Airport & Aircraft Operators re Draft Regulatory Decision (relating to the night-time use of the runway system)

**Date:** 9<sup>th</sup> December

**Time:** 14:30 Dublin Time.

**Location:** Dublin Airport & Online on Microsoft Teams

### Attendees: As Below:

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Name	Organisation	Name	Organisation
Leon Ronan	DAA	Jane Roche	DAA
Ashling Dunne	DAA	Stephanie Boutin	Air Transat
Simon Fagan	DAA	Philip Ireland	IATA
Eoin Mc Loughlin	DAA	Colette Zraibi	IATA
Joshua Grafman	JetBlue	David Yaacov	Emirates
Peter O'Broin	IATA	Ciaran Smith	Emerald Airlines
Gaynor Southan	British Airways	Brian Minogue	Tom Phillips + Associates
Jesus Tovar Horcajo	Ryanair	Valentin Meurice	Lux air
Brian Hedberg	FedEx	Mauricio Meixueiro Rios	Emirates
Peter Hickisch	DHL	John Nielsen	SAS
Nanda Horenberg	KLM	Maria Antonia Ramis Bernad	Vueling
Steven Ronald	Aer Lingus	Michele Boyce	United Airlines
David Lawrence	TUI	Volker Wackernagel	Air Canada
Eoin Doyle	Aer Lingus	Terry Symmans	Airnav Ireland
Micha Hofmann	Ups	Ed Domaracki	United
Rory McGrenaghan	British Airways	Alexandra Fourn	Air France
Hsin-Pei Wu	Qatarairways	Sonja Hermann	Sun express
Noah Neis	American Airlines	Sarah Bell	Ups

Simon Fagan (SF), Head of Planning and Economic Regulation for DAA, opened the meeting and reminded the attendees that the meeting is a requirement for the airport under the Planning and Development Act, 2000 (as amended by the Aircraft Noise (Dublin Airport) Regulation Act, 2019). SF then referred to the previous meeting held on the 27<sup>th</sup> of November where Brian Minogue (BM) took the participants through a presentation explaining the draft regulatory decision of An Bord Pleanála. SF explained the objective of the meeting today was to provide an opportunity for Q&A and further clarification on the presentation and questionnaire that was previously shared.

An opportunity for discussion of the draft regulatory decision was then facilitated, including discussion on the presentation and questionnaire. All participants/attendees were invited to make comments and ask questions.

Peter O'Brien (POB) IATA highlighted the value in numbers and varied responses and encouraged all airlines to make their views known to An Bord Pleanála.

SF highlighted the importance for airlines to outline the impact the movement cap would have on their business and the potential growth implications at Dublin Airport. He also stressed the importance of the Balanced Approach and for the airlines to query the need of a movement cap on top of a noise quota system.

Dave Lawrence (DA) TUI asked would Dublin Airport provide a copy of their submission to the group.

Jane Roche (JR) DAA, explained that the DAA have two responses for the submission, firstly as the applicant which is non-airline related and second representing the consultation with the airlines. Jane stressed that each submission should be unique, but she is happy to share the cover letter outlining the views of the airlines with the group.

Eoin Doyle (ED) Aer Lingus, commented on the importance of highlighting the scale of the movement cap and asked for the figures to be shared with the group.

JR responded to say that the figures were outlined in the presentation that was shared after the previous meeting. She also mentioned the gap in the figures and discussed the 61% reduction in current activity and how the implications were far reaching.

Michelle Boyce (MB) United, commented on the wording of the night period and wanted clarification on what constitutes the night period 06:59 or 07:00.

JR replied and stated that as per the declaration the literal wording applied which is 06:59.

Phillip Ireland (PI) IATA - asked if we agreed on a reduction methodology.

SF responded and advised that we had discussed it conceptually and there were different views on how a reduction would be implemented. He stressed that while we do not want any reduction, if we had no choice and were given a movement cap that is lower than actual figures it would go to the IAA to decide how it should be implemented.

PI responded saying the airlines have a problem with the fact there is no clear indication of how it will be implemented and should mention this in their submission.

Leon Ronan Capacity Planning Senior Manager for DAA reminded the group of the deadline of the 18<sup>th</sup> of December to submit any views on the survey to the DAA. He also mentioned the deadline for submissions directly to An Bord Pleanála is 23 December and confirmed the combined views and cover letter will be sent to all.

**The meeting concluded at 15:00pm.**

### **Appendix 3 - DAA IAA Meeting 16120224 Minutes**

## Meeting Minutes

**Meeting:** Engagement between Dublin Airport & IAA re Draft Decision (relating to the night-time use of the runway system)

**Date:** 16<sup>th</sup> December

**Time:** 11:00 Dublin Time.

**Location:** Dublin Airport & Online on Microsoft Teams

### Attendees: As Below:

Name	Organisation	Name	Organisation
Leon Ronan	Daa	Luke Manning	IAA
Simon Fagan	Daa	Brian O'Mahony	IAA
Ashling Dunne	Daa	Adian Corcoran	IAA

### Agenda

1. Overview of the An Bord Pleanála draft decision on the Relevant Action
2. Discussion on the technical feasibility of implementing operating conditions.
3. Discussion on alternatives to the operating restrictions proposed in the An Bord Pleanála draft decision.

Simon Fagan (SF), Head of Planning and Economic Regulation for DAA, opened the meeting and referred to the requirement for the airport, under subsection 6(a) of section 37 of the Planning and Development Act, 2000 (as amended) to engage with the Irish Aviation Authority on the technical feasibility of and other alternatives to the noise mitigation measures or operating restrictions, the subject of the draft decision. The meeting was the culmination of several meetings on the agenda topics which included consultation meetings, held on the 27<sup>th</sup> of November and 09<sup>th</sup> of December where the IAA, operators of aircraft and airline representative groups were in attendance and a separate bilateral meeting with the IAA held on the 22<sup>nd</sup> of November.

At the previous engagement session, held on the 22<sup>nd</sup> of November, attendees were taken through a presentation explaining the draft decision of An Bord Pleanála and the issues which were pertinent to the airline and airport operating community. An opportunity for discussion was then facilitated, including the technical feasibility of and alternatives to the noise mitigation measures and operating restrictions contained in the draft decision.

### Agenda item 1 – Overview of the draft decision

SF provided a brief reminder of the material presented at the previous meeting, which included an outline of the process and timelines to date, a synopsis of the RA and outlined the relevant sections of the draft decision which included the operating restrictions imposed by condition 3(e) and Condition 5.

### Agenda item 2 – technical feasibility of implementing the draft operating restrictions.

SF noted that condition 5 provided for a maximum number of nighttime aircraft movements of 13,000 per annum between the hours of 2300 and 0700 local time, which would be a 61% reduction in nighttime movements when measured against current activity. As there was no definition of technically feasible in the act, SF stated that the IAA may wish to consider the practical implementation of the operating restriction as they are responsible for the declaration of capacity under EU 95/93.

**Agenda item 3 – Alternatives to the draft operating restrictions.**

SF facilitated a discussion regarding alternatives to the operating restrictions contained within the draft decision and noted that any operating restriction or alternative, must follow the process required under Regulation 598, be in line with the Balanced Approach and should be no more restrictive than necessary to satisfy the requirements of the Noise Abatement Objective, NAO.

Luke Manning (LM) noted that the IAA were reviewing the draft decision and intended to provide a separate submission in response to the draft decision.

**The meeting concluded at 12:00pm.**



## **Appendix 4 - 20241216 - RA Consultation Survey Form for airlines views QR**

## **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 55dB<sub>L</sub>night contour, or dwellings within 50dB<sub>L</sub>night contour who experience a change of +9dB and Residential dwellings or, subject to 80dB L<sub>A</sub>max between 11pm and 7am.*

Response on behalf of:

<b>Condition 3</b>	
1	Comments on technical feasibility
<ul style="list-style-type: none"> <li>How are significant delays going to be treated in regard to the use of the north runway. Safety, maintenance and adverse weather conditions are only mentioned</li> <li>Qatar Airways operates using a banked structure meaning departure/arrival time is critical for connectivity. We must maintain current timings in order to protect the financial viability of the route and not jeopardise the key role it plays for the Irish economy as a air bridge to the east.</li> <li>Any imposition of a quota will restrict Qatar Airways ability to grow limiting the Irish economy and people access to our expanding network of over 170 global destinations. This lack of growth will also result in more constrained capacity among airlines and higher prices for consumers and tourists.</li> <li>In recent years Qatar Airways have expanded in Dublin though both frequency and larger aircraft. We intend to continue this growth into the future, but any movement limit will likely result in growth being placed elsewhere in our network to the detriment of the Irish economy.</li> </ul>	
2	Comments on alternatives
<ul style="list-style-type: none"> <li>Why can't the northern runway be used for arrivals between 0600-0800L. Does this limit slot availability or flexibility (retimes) overall</li> </ul>	
<b>Condition 4</b>	
1	Comments on technical feasibility
<ul style="list-style-type: none"> <li>Need to ensure QR's historic slots are protected as part of the quota count/allocation</li> <li>Qatar Airways operates using a banked structure meaning departure/arrival time is critical for connectivity. We must maintain current timings in order to protect the financial viability of the route and not jeopardise the key role it plays for the Irish economy as a air bridge to the east.</li> <li>Any imposition of a quota will restrict Qatar Airways ability to grow limiting the Irish economy and people access to our expanding network of over 170 global destinations. This lack of growth will also result in more constrained capacity among airlines and higher prices for consumers and tourists.</li> <li>In recent years Qatar Airways have expanded in Dublin though both frequency and larger aircraft. We intend to continue this growth into the future, but any movement limit will likely result in growth being placed elsewhere in our network to the detriment of the Irish economy.</li> </ul>	
2	Comments on alternatives
<ul style="list-style-type: none"> <li>Process/rules for the noise quote period (2300-0700L) needs to be transparent and flexible to enable airlines to maximise/optmise capacity</li> </ul>	
<b>Condition 5</b>	

1	Comments on technical feasibility
<ul style="list-style-type: none"> <li>• Need to ensure QR's historic slots are protected if the overall historic slot position exceeds the limit between 2300-0659L. QR currently has arrivals in the 0600-0659L window in both seasons</li> <li>• Qatar Airways operates using a banked structure meaning departure/arrival time is critical for connectivity. We must maintain current timings in order to protect the financial viability of the route and not jeopardise the key role it plays for the Irish economy as a air bridge to the east.</li> <li>• Any imposition of a quota will restrict Qatar Airways ability to grow limiting the Irish economy and people access to our expanding network of over 170 global destinations. This lack of growth will also result in more constrained capacity among airlines and higher prices for consumers and tourists.</li> <li>• In recent years Qatar Airways have expanded in Dublin though both frequency and larger aircraft. We intend to continue this growth into the future, but any movement limit will likely result in growth being placed elsewhere in our network to the detriment of the Irish economy.</li> </ul>	
2	Comments on alternatives
<ul style="list-style-type: none"> <li>• Increase the cap to ensure no historic slots are impacted</li> <li>• Need flexibility to slot swap – will this be allowed</li> <li>• Where the annual movements are split by season can in some cases the movements in winter be transferred to summer. Annual movement count remains fixed but flexibility between seasons is preferred</li> </ul>	
<b>Condition 6</b>	
1	Comments on technical feasibility
<ul style="list-style-type: none"> <li>• Flight operations are currently reviewing. Can this be submitted at a late date</li> </ul>	
2	Comments on alternatives
	Any further comments

**Appendix 5 - 20241220\_RA Consultation Survey Form for airlines views\_I2\_IB**

**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”)

**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 55dB<sub>L</sub>night contour, or dwellings within 50dB<sub>L</sub>night contour who experience a change of +9dB and Residential dwellings or, subject to 80dB L<sub>A</sub>max between 11pm and 7am.*

Response on behalf of: VUELING AIRLINES

Condition 3	
1	Comments on technical feasibility
The imposition of such a restriction would have a negative impact on airport operations, causing a reduction in airport capacity and runway movements thereby increasing taxi times with on time performance being adversely affected during the critical “first wave” period.	
Limiting the North runway to departures only from 0600-0800 daily will have the effect of causing single runway operations at Dublin Airport when the airport is operating with winds in an easterly direction. Both arrivals and departures would be required to use the South Runway as departures from the north runway when 10L would be required to be used is not permitted.	

The proposed approach fails to acknowledge Ireland's geographic positioning and time difference with Central European time. In addition, the 0600-0800 is the busiest time of the day for departing aircraft at Dublin and critical to ensure optimal aircraft utilisation.

2	Comments on alternatives
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Maintaining a smooth running of Dublin Airport when winds are in an easterly direction, requires both runways to remain open as is the case today with departures taking place on the Southern Runway and arrivals on the Northern Runway.

Failure to ensure that both runways can remain in operation will cause significant congestion for both arrivals and departures not just from 0600-0800 but beyond that as the flying programme of based operators will be off schedule for the day and therefore cause delay to non-based operators such as "xx airline" later in the day. This would be unacceptable for non-based operators.

Airline schedules are planned and put on sale up to a year in advance. No airline or indeed airport can foresee which way the wind can blow on a given day.

Furthermore, the runway capacity of the airport has been declared and slots allocated assuming the use of both runways from 0700.

#### Condition 4

1	Comments on technical feasibility
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Vueling Airlines is broadly supportive of QC limit of 16,260 This is in line with what Dublin Airport proposed to Fingal County Council (FCC) and was approved by FCC and the state's Aircraft Noise Competent Authority (ANCA).

Vueling Airlines believes this is a reasonable and fair way of managing noise at the airport as it provides for an upper ceiling on noise but also gives opportunity for growth as and when quieter aircraft come on stream.

2	Comments on alternatives
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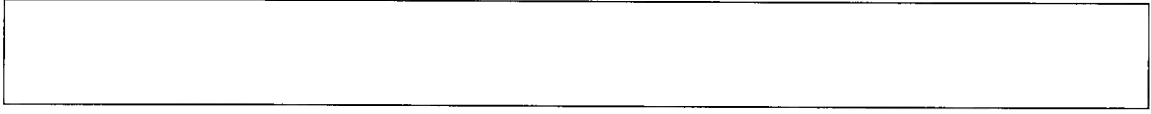
Vueling Airlines believes that the level approved for by FCC and ANCA is line with Ireland's requirements under Regulation 598/2014 (Balanced approach). 598/2014 aims are to ensure that operating restrictions are proportionate and that the most cost-effective combination of measures are applied.

The ABP draft decision nighttime movement restrictions are not supported by the application of the balanced approach nor quantifies the significant economic impact of the proposed decision to air carriers or the wider Irish economy.

Implementing a movement cap as the inspector as proposed will ultimately mean that the QC level of 16,260 is never reached and therefore meaningless. We therefore urge the inspector to approve the QC level set by FCC and ANCA and not conflate it with a movement limit.

<b>Condition 5</b>	
1	Comments on technical feasibility
<p>The basis for a 13,000-movement limit from 2300-0659 (inclusive) is unclear as there was no reference to supporting information for this consultation. This would equate to just 35 movements for each night on average per annum. This is significantly below the current level of flights which we understand to be c.115 in summer and c.65 in winter.</p> <p>Setting such a limit which in practical terms which is significantly below the proposed QC limit of 16,260 would mean that there would be a circa 65% reduction in flights operated at night at Dublin. We understand most if not all these flights are operated with slots that enjoy historic rights under Regulation 95/93. Moreover, any flights that are operated in the night tend to be from based operators rather than non -based operators and we therefore believe that it would be impossible for those airlines to reschedule as the aircraft are fully tasked for the rest of the day.</p> <p>Furthermore, it is unclear what the inspector means referring to summer and winter. For avoidance of doubt, Vueling Airlines defines summer and winter in line with the universally accepted IATA definitions which for summer is from the last Sunday in March until the Saturday before the last Sunday in October. For Winter it is from the last Sunday in October until the Saturday before the last Sunday in March. The inspector's report seems to suggest that summer only lasts for 92 days and that during this period, the proposed split of the 13,000 to be 9,100 in summer and 3,900 in winter would mean that there would be c.100 flights allowed in each night. The inspector fails to acknowledge that this would mean there would be zero flight movements permitted in the night for the remainder of what airlines consider summer (IATA season)</p>	
2	Comments on alternatives
<p>Vueling Airlines would suggest that the Board revert to the QC limit as approved by FCC/ANCA as without a limit that can be materially reached, there is no incentive for airlines to use quieter aircraft at night. The Inspector's report has the (intended or unintended) consequence of making the FCC/ANCA decision redundant.</p>	
<b>Condition 6</b>	
1	Comments on technical feasibility
2	Comments on alternatives
	Any further comments





**Appendix 6- RA Consultation Survey Form for airlines views - TUI (TOM BLX)**

**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”)

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 55dB<sub>L</sub>night contour, or dwellings within 50dB <sub>L</sub>night contour who experience a change of +9dB and Residential dwellings or, subject to 80dB <sub>L</sub>Amax between 11pm and 7am.

Response on behalf of: IBERIA EXPRESS/ IBERIA

Condition 3	
1	Comments on technical feasibility
The imposition of such a restriction would have a negative impact on airport operations, causing a reduction in airport capacity and runway movements thereby increasing taxi times with on time performance being adversely affected during the critical “first wave” period.	
Limiting the North runway to departures only from 0600-0800 daily will have the effect of causing single runway operations at Dublin Airport when the airport is operating with winds in an easterly direction. Both arrivals and departures would be required to use the South Runway as departures from the north runway when 10L would be required to be used is not permitted.	

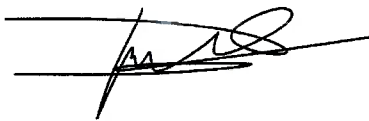
<p>The proposed approach fails to acknowledge Irelands geographic positioning and time difference with Central European time. In addition, the 0600-0800 is the busiest time of the day for departing aircraft at Dublin and critical to ensure optimal aircraft utilisation.</p>	
2	Comments on alternatives
<p>Maintaining a smooth running of Dublin Airport when winds are in an easterly direction, requires both runways to remain open as is the case today with departures taking place on the Southern Runway and arrivals on the Northern Runway.</p> <p>Failure to ensure to ensure that both runways can remain in operation will cause significant congestion for both arrivals and departures not just from 0600-0800 but beyond that as the flying programme of based operators will be off schedule for the day and therefore cause delay to non-based operators such as IBERIA EXPRESS/IBERIA later in the day. This would be unacceptable for non-based operators.</p> <p>Airline schedules are planned and put on sale up to a year in advance. No airline or indeed airport can foresee which way the wind can blow on a given day.</p> <p>Furthermore, the runway capacity of the airport has been declared and slots allocated assuming the use of both runways from 0700.</p>	
<b>Condition 4</b>	
1	Comments on technical feasibility
<p>IBERIA EXPRESS/IBERIA is broadly supportive of QC limit of 16,260 This is in line with what Dublin Airport proposed to Fingal County Council (FCC) and was approved by FCC and the state's Aircraft Noise Competent Authority (ANCA).</p> <p>IBERIA EXPRESS/IBERIA believes this is a reasonable and fair way of managing noise at the airport as it provides for an upper ceiling on noise but also gives opportunity for growth as and when quieter aircraft come on stream.</p>	
2	Comments on alternatives
<p>IBERIA EXPRESS/IBERIA believes that the level approved for by FCC and ANCA is line with Ireland's requirements under Regulation 598/2014 (Balanced approach). 598/2014 aims are to ensure that operating restrictions are proportionate and that the most cost-effective combination of measures are applied.</p> <p>The ABP draft decision nighttime movement restrictions are not supported by the application of the balanced approach nor quantifies the significant economic impact of the proposed decision to air carriers or the wider Irish economy.</p> <p>Implementing a movement cap as the inspector as proposed will ultimately mean that the QC level of 16,260 is never reached and therefore meaningless. We therefore urge the inspector to approve the QC level set by FCC and ANCA and not conflate it with a movement limit.</p>	

<b>Condition 5</b>	
1	Comments on technical feasibility
<p>The basis for a 13,000-movement limit from 2300-0659 (inclusive) is unclear as there was no reference to supporting information for this consultation. This would equate to just 35 movements for each night on average per annum. This is significantly below the current level of flights which we understand to be c.115 in summer and c.65 in winter.</p> <p>Setting such a limit which in practical terms which is significantly below the proposed QC limit of 16,260 would mean that there would be a circa 65% reduction in flights operated at night at Dublin. We understand most if not all these flights are operated with slots that enjoy historic rights under Regulation 95/93. Moreover, any flights that are operated in the night tend to be from based operators rather than non -based operators and we therefore believe that it would be impossible for those airlines to reschedule as the aircraft are fully tasked for the rest of the day.</p> <p>Furthermore, it is unclear what the inspector means referring to summer and winter. For avoidance of doubt, IBERIA EXPRESS/IBERIA defines summer and winter in line with the universally accepted IATA definitions which for summer is from the last Sunday in March until the Saturday before the last Sunday in October. For Winter it is from the last Sunday in October until the Saturday before the last Sunday in March. The inspector's report seems to suggest that summer only lasts for 92 days and that during this period, the proposed split of the 13,000 to be 9,100 in summer and 3,900 in winter would mean that there would be c.100 flights allowed in each night. The inspector fails to acknowledge that this would mean there would be zero flight movements permitted in the night for the remainder of what airlines consider summer (IATA season)</p>	
2	Comments on alternatives
<p>IBERIA EXPRESS/IBERIA would suggest that the Board revert to the QC limit as approved by FCC/ANCA as without a limit that can be materially reached, there is no incentive for airlines to use quieter aircraft at night. The Inspector's report has the (intended or unintended) consequence of making the FCC/ANCA decision redundant.</p>	
<b>Condition 6</b>	
1	Comments on technical feasibility
2	Comments on alternatives
	Any further comments

IBERIA EXPRESS

Jorge Jiménez Zapater

Head of Network, Scheduling & Slots



IBERIA

Eva Chico Fernández

Slots Manager



**Appendix 7- 20241220 RA Consultation Survey Form for airlines  
views\_Vueling Reply**

**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 55dB<sub>L</sub>night contour, or dwellings within 50dB<sub>L</sub>night contour who experience a change of +9dB and Residential dwellings or, subject to 80dB<sub>L</sub>max between 11pm and 7am.*



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

<b>Condition 3</b>	
1	Comments on technical feasibility
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	
<b>Condition 4</b>	
1	Comments on technical feasibility
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	
<b>Condition 5</b>	
1	Comments on technical feasibility
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.	

<b>Condition 6</b>	
1	Comments on technical feasibility
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.	

## **Appendix 8 - RA Consultation Survey Form for airlines views - UPS**

**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”)

---

**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 LAmax between 11pm and 7am.*

Response on behalf of:

<b>Condition 3</b>	
1	Comments on technical feasibility
2	Comments on alternatives
<b>Condition 4</b>	
1	Comments on technical feasibility
2	Comments on alternatives
<b>Condition 5</b>	
1	Comments on technical feasibility
<b>Impact to Express Cargo Industry</b>	
<p>All cargo flights account for approximately less than 15% of the total movements in the night period (based on S25 numbers), yet the value we bring to the wider economy is much more significant. Night flights currently make an invaluable contribution to Ireland's economy, supporting €1.1billion in GDP and 15,000 jobs. Freight flown at night accounts for 38% of the total freight volumes at Dublin airport, and nearly two thirds of this is transported by express freight operators, primarily those shipping perishable and other time-sensitive goods. <sup>1</sup></p> <p>Express cargo is key to the supply chain, enabling Irish businesses, especially in the hi-tech, retail, pharmaceutical and healthcare industries to send and receive just-in-time deliveries. Protecting air freight is critical to economic growth and keeping Irish businesses competitive in a 24-hour global economy. With customers requiring late afternoon collections and early morning deliveries, the only time we can move export and import shipments is by air and at night.</p> <p>UPS currently operates a daily (Mon-Fri) Boeing 767-300 flight at Dublin Airport which connects Dublin and Shannon to our main air gateway in Cologne, Germany:</p>	

<sup>1</sup> <https://ftai.ie/wp-content/uploads/2023/05/Air-Cargo-Night-Flying-FINAL.pdf>

- Arrives 04:50 from Cologne and Departs 05:35 to Shannon (which falls within the night-time period)
- Arrives 20:35 from Shannon and Departs 21:20 to Cologne

If we were to lose one or both of our slots within the night period, this would put us, as well as business in the wider Dublin area, in a severe competitive disadvantage as packages would be delayed. Simply flying to Shannon Airport would not solve the issue. Delays in Dublin would also affect Shannon Airport and could cause subsequent crew and aircraft availability in Cologne. Rerouting the flight CGN-SNN-DUB and vice versa to mitigate the impact would negatively affect DUB in the P.M. ops through earlier cut off times, meaning customers would need to have their goods ready earlier in the day as well as an increase in fueling and crew costs, because CGN-SNN-DUB is longer than CGN-DUB-SNN.

By flying goods to Shannon, operators would either need to put HGVs on the road to transport goods to Dublin, creating congestion and additional carbon emissions. Alternatively, goods could then be flown from Shannon to Dublin outside of the night-time hours. However, in both cases this would result in the delay of goods reaching businesses in Dublin and the wider region, reducing international competitiveness and creating inefficiencies within the supply chain.

If the sector is significantly restricted from flying at night this will severely impact the express industry with wider implications across the supply chain and Irish economy including:

- Major disruption to supply chains – this will impact each operator’s operational networks, which will have knock on effects to the entire supply chain, increasing cost to their business and how they serve their customers.
- Reduced Competitiveness - Irish businesses will be less competitive if they are not able to receive or send goods as quickly and efficiently as their EU counterparts, again increasing costs and impacting competitiveness.
- Reduced Investment - Negative consequences for Ireland Inc. as a location of foreign direct investment.
- Reduced Employment - Significant job losses across the entire airport as well as wider business community.
- Increased congestion - If goods cannot get in in time for AM delivery it may come by road transport, if at all, resulting in more trucks on road, more congestion and an impact on the environment.

2	Comments on alternatives
<b>Condition 6</b>	
1	Comments on technical feasibility
2	Comments on alternatives

	Any further comments

**Appendix 9 - RA Consultation Survey Form for airlines views\_BA BACF  
response 20Dec24**



**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”)

---

**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.*
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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 55dB<sub>L</sub>night contour, or dwellings within 50dB<sub>L</sub>night contour who experience a change of +9dB and Residential dwellings or, subject to 80dB<sub>L</sub>Amax between 11pm and 7am.*

Response on behalf of: BRITISH AIRWAYS (including BA Cityflyer)

<b>Condition 3</b>	
1	Comments on technical feasibility
<p>The impact on the crucial 'first wave' period is of great concern. Delays are already experienced in this period and further degradation of performance because of the impact of this condition will come at a significant cost to airlines and therefore consumers.</p> <p>The impact of the time difference with central Europe must be taken into consideration and what this means to time sensitivities for airlines flying into Ireland.</p>	
2	Comments on alternatives
<p>Removing the use of the Northern Runway in the proposed period will adversely affect performance. This in turn will then increase the period delays are experienced for both based and non-based airlines.</p> <p>The declaration process for S25 has taken place and considered both runways in use from 0700.</p>	
<b>Condition 4</b>	
1	Comments on technical feasibility
<p>British Airways is broadly supportive of QC limit of 16,260 This is in line with what Dublin Airport proposed to Fingal County Council (FCC) and was approved by FCC and the state's Aircraft Noise Competent Authority (ANCA).</p> <p>British Airways agrees this is a reasonable and fair way of managing noise at the airport as it provides for an upper ceiling on noise but also gives opportunity for growth as and when quieter aircraft come on stream.</p>	
2	Comments on alternatives
<p>British Airways understands that the level approved for by FCC and ANCA is in line with Ireland's requirements under Regulation 598/2014 (Balanced approach). 598/2014 aims are to ensure that operating restrictions are proportionate and that the most cost-effective combination of measures are applied.</p> <p>If the movement cap is implemented as proposed, it will remove the importance of the QC limit. This is an essential tool to encourage airlines to operate quieter aircraft.</p>	
<b>Condition 5</b>	
1	Comments on technical feasibility

	<p>The reason for the substantial reduction of night movements proposed versus what already operates is not clear given there was no supporting information referred to.</p> <p>The impact of implementing the severely reduced movement cap would lead to airlines who currently operate in the night being unable to fit the planned flying into the reduced day.</p> <p>The reference to summer and winter lengths does not appear to be correct in the proposal, according to the IATA definitions (and universally how airlines see these season lengths as defined).</p>
2	Comments on alternatives
	British Airways suggests that the Board uses the QC Limit as approved.
<b>Condition 6</b>	
1	Comments on technical feasibility
2	Comments on alternatives
	Any further comments

**Appendix 10 - RA Consultation Survey Form for airlines views-EA**

**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.*
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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 LAm<sub>ax</sub> between 11pm and 7am.*

Response on behalf of:

<b>Condition 3</b>	
<b>1</b>	<b>Comments on technical feasibility</b>
<p>While Emerald Airlines respect the rational used by An Bord Pleanála to introduce clarity and to preserve the interest of the protection of the amenities of the surrounding areas, Condition 3(e) when taken together with the existing Condition 3(c) means that in easterly wind conditions, aircraft could neither arrive or depart from the North Runway and all operations would be forced to the South Runway.</p> <p>It is imperative for the smooth operation of an airport and airline schedules that runway operations are flexible to take account of weather conditions on the day of operation. According to Met Éireann, easterly wind conditions occur most often between February and May and are commonly accompanied by dry conditions. While these are not the prevailing wind conditions at Dublin Airport, operations would be significantly disrupted if all operations were forced to the South Runway due to increased taxi-times and knock-on congestions.</p> <p>Easterly conditions between February and May would lead to congestions, delays and possible flight cancellation coinciding with key travel period including St. Patricks day, Easter and May holiday periods.</p>	
<b>2</b>	<b>Comments on alternatives</b>
<b>Condition 4</b>	
<b>1</b>	<b>Comments on technical feasibility</b>
<p>Many different effects of noise can be identified and people experience each of them differently. For the practical assessment of any particular effect, it is necessary to define an appropriate indicator of reaction to correlate with a noise exposure measure.</p> <p>Emerald Airlines agree with An Bord Pleanála in adopting the Quota Count (QC) system as proposed by the Aircraft Noise Competent Authority (ANCA) and Fingal County Council. We, however, disagree with the determination of the '<i>Night Time</i>' as the hours at night between 23:00 to 07:00 local time.</p> <p>This definition of nighttime is inconsistent with the '<i>Night Time</i>' definition adopted by comparator airports, particularly those countries using Greenwich Mean Time (GMT). With Ireland operating on a different time zone to our biggest trading partner, the European Union, it is critical that airlines are able to operate unimpeded in the 06:00 hour to negate against the impacts GMT being -1 hour behind Central European Time (CET).</p>	

60% of passengers who use our scheduled flights for business purposes complete at least on flight leg which departs Dublin Airport between 06:00-07:00 local time (07:00-08:00 CET). Moving the 06:00-07:00 hour into the nighttime period would disrupt this key passenger demographic.

2	Comments on alternatives
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#### Condition 5

1	Comments on technical feasibility
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We are surprised by the proposed new Operation Restriction tabled by An Bord Pleanála in the draft decision. The methodology used in the determination to create a movement limit has not followed the Balanced Approach (EU Reg 598) and ICAO Annex 16 requirements that must be followed when considering operating restrictions at an EU Airport. It is our strong belief that the calculation on which the ABP movement limit was set uses different metrics to the recommendation for a movement limit in the inspector's report.

This key oversight, essentially limiting movements per night to an annual average of 35 per night would have a detrimental impact on all operators at Dublin Airport, equating to a draconian 60% reduction in movements. Aircraft are easily movable assets which airlines will move away from Dublin if this draft decision was to be enforced. In the case of Emerald Airlines, these assets would be moved outside of the Republic of Ireland.

This draft condition casts a serious doubt on planned investments by Emerald Airlines in new aircraft, new routes and new jobs for our operations at Dublin Airport. Our operations and network of flights are highly complex, feeding into an intertwined web of restrictions at other airports throughout the United Kingdom and Europe. A movement limit which would result in a 60% reduction in movements would be a hammer blow to Irish tourism, jobs and the wider economy and goes completely against to the National Aviation Policy.

2	Comments on alternatives
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#### Condition 6

1	Comments on technical feasibility
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2	Comments on alternatives
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	Any further comments