

File With

## SECTION 131 FORM

Appeal No

ABP— 314485

Defer Re O/H

☐

Having considered the contents of the submission dated 20/12/24 received from European Express 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 more reasons

Section 131 not to be invoked at this stage.

☒

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

☐

Signed

[Signature]

Date

23/12/24

EO

Signed

[Signature]

Date

SEO/SAO

M

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

To

Task No

Allow 2/3/4 weeks

BP

Signed

Date

EO

Signed

Date

AA



## Planning Appeal Online Observation

Online Reference  
NPA-OBS-004127

B740  
VP  
24/12

### Online Observation Details

Contact Name  
Alessia Affinito

Lodgement Date  
20/12/2024 15:07:29

Case Number / Description  
314485

### Payment Details

Payment Method  
Online Payment

Cardholder Name  
Alessia Affinito

Payment Amount  
€50.00

### Processing Section

S.131 Consideration Required

☒ Yes — See attached 131 Form

☐ N/A — Invalid

Signed

EO

Date

23/12/24

### Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG— 076860-24

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\_3QY7nZB1CW0EN5FC1rZS9ycw

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

20 December 2024

## **EEA observations on current noise discussions at DUB airport**

### **Introduction**

Long recognized as an **essential service**, especially during the COVID-19 pandemic, express transport contributes to the competitiveness of the European industry by connecting European businesses and citizens to more than 90% of the world economy within 24 to 72 hours. Express service providers transport time-sensitive documents, perishable goods, high value items and shipments in a seamless, integrated global logistics chain where 1) various modes of transport come together at and around airports, 2) full flexibility and inter-modality are required for fast delivery, and 3) control of the full transport chain is critical for the express industry to ensure quality, operational safety and security.

Through our fast, reliable next-day delivery services, the members of the European Express Association – DHL, FedEx, UPS – underpin Europe's supply chain resilience and competitiveness. Our efficiency is a prerequisite for business success, with our specialised expertise avoiding additional storage and transport costs, thereby protecting jobs and stable communities. This is why **operational flexibility which includes night operations is central to our business model, thereby contributing to delivering a competitive and prosperous Europe.**

Against this background, we would like to comment on the latest developments on current noise discussions at DUB airport, most specifically **An Bord Pleanála's Draft Decision Case Number: ABP-314485-22 to introduce a 13,000 annual night movement limit.**

The draft decision to replace Condition No. 5 with a noise quota scheme as supported by the Dublin Airport Authority is an idea supported by industry. The new and unexpected addition of a nighttime cap is not workable for the aviation industry and harmful to Irish economic interests.

The decision seems to be self-contradictory. The new limit will be more restrictive than the cap that would have been imposed under Condition No. 5 that the noise quota system (NQS) is replacing. It needs to be taken into account that current annual nighttime movements amount to approx. 32,000 per annum (an annualized average of nearly 90 flights per night); the draft decision effectively reduces the amount of night flights to approximately a third of the current numbers.

Therefore, the draft decision proposal runs contrary to the recommendations of the Airport Noise Competent Authority (ANCA) in August 2022, which confirmed that DAA's proposal to replace Condition 5 with an NQS was sufficient.

On top of this proposed extreme reduction of the annual nighttime movements, which will have a negative effect on operations in Dublin airport, and by extension to Ireland's connectivity, there is in addition an increasing degree of uncertainty as to what access to Dublin airport will be like in 12 months' time.

### **Points for Consideration**

#### **1. The draft movement condition runs contrary to the finding of the ANCA and FCC Decision – neither of which sought to include a movement limit.**

- The 13,000-movement cap limit will have a disproportionate impact on express cargo operators who fly at night out of necessity, rather than choice, and will have wider implications for Ireland's economic growth and international competitiveness.
- This movement cap must be removed, and the decision must focus solely on the proposed NQS.
- We recognise the benefits of a noise quota (also known as quota count/QC) system for limiting noise at airports, subject to the prior completion of a Balanced Approach assessment determining that operating restrictions are necessary. The QC system is designed to incentivise quieter aircraft rather than capping movements and this should provide operators with flexibility how to manage their QC. Therefore, a noise quota system should not be combined with a movement limit.

#### **2. The QC system**

- Recommendations have been made by the Airport Noise Competent Authority (ANCA), the competent authority responsible for determining the noise objective, regarding the replacement of the cap with a noise quota system. EEA strongly suggests maintaining this line of action, similar to the systems implemented in Hong Kong, Warsaw and some UK airports, to avoid any kind of additional annual night movement limit.
- We strongly recommend conducting a cost-effectiveness analysis to ensure that all available options under the ICAO Balanced Approach are considered. This cost-effectiveness analysis must include all impacts to the national infrastructure and needs of the entire country, not only directly related jobs in the vicinity of the airport (e. g. a factory in Dublin, which potentially would receive shipments later than it does today, potentially having an impact on the production-line).
- EEA agrees with the ANCA decision stating the QC system would be sufficient to meet the noise objective. In fact, the QC system is designed to incentivise quieter aircraft and limiting noise at the designated airports, subject to the completion of a Balanced Approach assessment. Alternative regimes, such as night movement capacity limitations may unnecessarily restrict movements and reduce the socio-economic benefits provided by aviation.
- Therefore, combining a QC system with an add-on movement restriction would harm the effectiveness of the system, as it would disadvantage airlines and the surrounding communities. In fact, it makes the QC system redundant.

#### **3. Balanced Approach Impact Study procedure**

- Any noise-related operating restriction should only be considered following a comprehensive assessment of the first three pillars of the International Civil Aviation Organization (ICAO) Balanced Approach to Aircraft Noise Management (Balanced Approach) adopted by the ICAO Assembly in its 33rd Session in 2001 and reaffirmed in all the subsequent Assembly Sessions.
- Ireland, as a signatory to the Chicago Convention, should adhere to the ICAO Balanced

Approach before introducing any operating restrictions to address noise-related concerns at Dublin airport. It is essential that clearly substantiated noise targets are established first and that alternative actions are taken before such restrictions are pursued further.

- The Balanced Approach, as defined by ICAO and enshrined in EU Regulation 598/2014, involves identifying the noise problem and analysing measures to reduce noise across four pillars: 1) reduction at source, 2) land-use planning and management, 3) noise abatement operational procedures, and 4) operating restrictions. We strongly suggest thoroughly assessing the impact and cost effectiveness of potential measures in Pillars 1-3 of the ICAO Balanced Approach before any further consideration is given to implementing any additional operational restrictions in Pillar 4, which should be viewed as a last resort.
- Additionally, any measure should be gradually introduced, providing sufficient time to adapt to new conditions, and consider reasonable solutions for the sector, among others by taking into account the state of technology, grandfathering provisions, and long-term operational planning security.
- Express operations are part of a network organisation. Flight operations are connected into a complex organisational structure in order to ensure customers' shipments are delivered efficiently and effectively across the world. Any changes to a hub as crucial as Dublin Airport will have an impact, not only on the country, but on the wider network. Furthermore, local, regional and international road and air networks are connected. Trucks and planes operate according to a pre-determined schedule, allowing for time sensitive transportation. Our integrated networks are unique and specialised, altering one component in the network will have a knock-on effect elsewhere in our respective networks, as well as adversely impacting our customers (e.g., affecting agreed pickup and delivery times aligned with manufacturing processes). Changes regarding operation of aircraft often have a multiplying effect because when one flight is altered or even removed, it has a significant impact on the entire network.
- Whilst we support measures to reduce the noise impact from our aviation activities, and historically work closely with affected areas, we would like to stress that the suggested commencement dates lack a rational relationship to established needs and that the pace is too high and impractical for certain measures, especially operational measures.

#### **4. Maintaining competitiveness and connectivity in Ireland**

- **Competitiveness:** Ireland's success in attracting Foreign Direct Investment (FDI) and exporting to global markets needs to be kept. In fact, as per [Irish Government White Papers on Enterprise 2022 - 2030](#), FDI and trade will remain central to the Irish growth model and economic strategy. The response to changing globalisation patterns and supply chain fragmentation shall be flexible and agile while providing continuity and stability as an investment country.
- All cargo flights account for approximately less than 15% of the total movements in the night period (based on S25 numbers), yet the value they 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>
- According to the [Central Statistics Office \(CSO\)](#), the value of Ireland's Exports in 2023 was €197

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<sup>1</sup> [Air-Cargo-Night-Flying-FINAL.pdf](#)

million and international freight handled by Irish airports in 2023 represented 159,243 tonnes. This data highlights a significant volume of air traffic in Ireland, which has implications for the country's economic landscape, particularly in the context of Foreign Direct Investment (FDI). Ireland's global connectivity strengthens its appeal, particularly for industries like tech, life sciences, and pharmaceuticals, which have a strong manufacturing presence there, and rely on supply chain certainty.

- The move to restrict night-time flights increases uncertainty, instability and it will increase costs for business. This move is regressive and will directly impact the productivity of businesses which will have a knock-on impact on GDP. The move will affect expansion plans of businesses and future investment decisions made by companies, which will impact output and future job growth.
- We also need to consider the impact on critical supply chains. Ireland has the highest number of pharma/med-tech companies in the world. Their supplies are critical to their success and to the people the world over who depend on them. Reducing flights at Dublin Airport will significantly disrupt the vital supply chains that these businesses rely on. Night flights are crucial to ensuring that time-sensitive goods, such as medical supplies, perishable products, and essential components for industries, reach their destinations on time.

In summary, EEA opposes any kind of night flights movement cap on top of a QC scheme, because it would negatively impact on Irish and therefore European competitiveness. Put differently: Reducing night flights could weaken the competitive edge and encourage businesses to move elsewhere where flight operations are not restricted. **The Economic Impact of Cargo Night Flying at Dublin Airport report**<sup>2</sup> by York Aviation, showed that nighttime flights carry around €19 billion worth of imports and exports every year, including 12% of Ireland's total imports and 6% of its exports. Night flights are a catalyst to driving productivity in Ireland's economy, which is estimated to generate over EUR 1.1 billion in annual GDP and supports around 15,000 jobs across the air cargo sector, as well as at the airport itself.

**Mario Draghi's report**<sup>3</sup> and **Enrico Letta's report**<sup>4</sup> for the European Commission both point out that it is essential to move towards increasing the competitiveness of the EU and its Member States if Europe is to remain prosperous; any night flights movement cap runs counter to their observations by undermining current and future value chains, as well as opportunities for investment and export/import. Ireland is the gateway to the EU, on the periphery of the continent, and it is crucial to maintain its connectivity and trade flows.

The global landscape is changing, meaning we need to intensify our competitive offering, not pull-back, if we are to remain competitive and relevant. Ireland's success in attracting FDI and exporting to global markets is built upon agility and flexibility to respond to changing global circumstances.

## Conclusion

**A/ A Movement cap (of 13,000) and a Noise Quota System are not compatible.** We support the Noise Quota Scheme and therefore reject the movement cap or any combinations of thereof.

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<sup>2</sup> [Economic Impact of Cargo Night Flying at Dublin Airport by York Aviation](#)

<sup>3</sup> [Mario Draghi's Report](#)

<sup>4</sup> [Enrico Letta - Much more than a market \(April 2024\)](#)



- Recommendations have been made by the Airport Noise Competent Authority (ANCA), the body responsible for determining the noise objective, in regard to the replacement of the flight movements cap with a NQS. On behalf of our members, we strongly suggest maintaining this line of action, in order to avoid any kind of additional annual night movement restrictions .
- We are strongly opposed to any decreases to the current Dublin airport movement limits on top of the introduction of a QC system, as this would impact our members' services to customers and damage Ireland's competitiveness,. A movement limit by its nature caps activity rather than incentivising quieter aircraft, and so is not as effective at managing noise. Moreover, a movement cap would undermine a QC system, if not make it redundant.

**B/ We strongly recommend conducting a cost-effectiveness analysis to ensure all available options under the ICAO Balanced Approach are considered.** This cost-effectiveness analysis must include all impacts to the national infrastructure and needs of the entire country, not only directly related jobs in the vicinity of the airport (e. g. a factory in Dublin, which potentially would receive our shipments later than today, potentially having an impact on its production-line).

**All competent authorities should work towards maintaining competitiveness and connectivity in Ireland.**

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#### **About the European Express Association**

*The European Express Association (EEA) represents the interests of the express industry in Europe. The express industry provides door-to-door transport and delivery of next-day or time-definite shipments, throughout Europe and the world. According to a 2020 Oxford Economics [study](#) on the impact of the express industry on the EU economy, the European express industry directly supported 330,000 jobs and an estimated 1.1 million indirect jobs in the EU in 2018, while generating €24 billion in tax revenues for EU Member States' governments that same year. EEA's EU Transparency Register number is 1894704851-83.*