

File With

SECTION 131 FORM

Appeal No

ABP— 314485-22

Defer Re O/H

Having considered the contents of the submission dated/received 23/12/24 from South Dublin Chamber 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 131

Section 131 not to be invoked at this stage.

☒

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

Signed



Date

30/12/24

EO

Signed

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

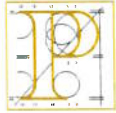
Date

EO

Signed

Date

AA



An
Bord
Pleanála

Planning Appeal Online Observation

Online Reference
NPA-OBS-004154

BP40 to issue
Camended NPA 02103
LDG-076981-24

Online Observation Details

Contact Name
Peter Byrne

Lodgement Date
23/12/2024 14:10:19

Case Number / Description
314485

Payment Details

Payment Method
Online Payment

Cardholder Name
Peter Byrne

Payment Amount
€50.00

Processing Section

S.131 Consideration Required

☒ Yes — See attached 131 Form

☐ N/A — Invalid

Signed

Cathy Conlon

EO

Date

30/12/24

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

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_3QZCKtB1CW0EN5FC1glOqsWq

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

Submission in Support of the North Runway at Dublin Airport

To Whom It May Concern,

I am writing to submit the views of South Dublin Chamber regarding the draft decision and associated conditions outlined by An Bord Pleanála (ABP) in relation to the North Runway at Dublin Airport (Reg. Ref. PL06F.314485). We urge ABP to reconsider and revise the proposed draft conditions due to the significant risks they pose to the airport's operations, Ireland's economy, and the principles established under both Irish and EU legislation.

South Dublin Chambers Key Concerns

1. Fundamental Issues with the Draft Decision and Process

- The draft decision, issued on 11th September 2024, and the Inspector's Report, dated 29th May 2024, raises concerns regarding process, understanding, calculation, and interpretation of the application documents.

- We are concerned that ABP may not have adhered to the process as mandated by the Planning and Development Act 2000 (as amended by the Aircraft Noise (Dublin Airport) Regulation Act 2019). This may undermine the validity of the decision and its proposed conditions.

2. Specific Conditions of Concern

- **Condition 3(e):** This condition imposes undue restrictions on the use of the North Runway during easterly winds, effectively barring operations between 06:00 and 08:00. This would force all operations onto the South Runway, creating operational inefficiencies and risks.

- **Condition 5:** The proposed 13,000 ATM night limit translates to an unsustainable average of 35 aircraft movements per night (11:30–07:00), with seasonal variations that severely disrupt operational planning. This restriction may be based on calculations not aligned with the airports operations and does not align with the airport's needs or the Noise Abatement Objective (NAO).

3. Failure to Properly Engage with the NAO

- Section 9.7 of the Aircraft Noise (Dublin Airport) Regulation Act 2019 states that mitigation measures must not exceed what is necessary to achieve the NAO. However, ABP's decision does not provide clear evidence that the proposed conditions are required to meet the NAO.

- Moreover, the Balanced Approach required by EU Regulation 598/2014 has not been followed to evaluate and select appropriate mitigation measures. If this does not comply with EU and Irish law then it necessitates a re-evaluation of the process.

4. Non-Compliance with EU and Irish Legislation

- The draft decision, including conditions 3(e) and 5, maybe non-compliant with EU Regulation 598 and the Aircraft Noise (Dublin Airport) Regulation Act 2019. The restrictions appear to us to be excessive and unjustified, failing to balance the operational needs of the airport with the NAO.

Economic Impact

The proposed restrictions on the North Runway would have major consequences for our regional and national economy:

- The economic fallout would impact aviation, tourism, trade, investment, and the broader economy due to direct and indirect effects.
- Full utilisation of the North Runway is vital to realising Ireland's economic potential and supporting sustainable growth.
- The EUs Draghi report published on the 9th September 2024 in addressing EU Competitiveness, highlights the need for modern , developed and properly functioning infrastructure , as an Island our key airport is vital to achieving that aim.

Conclusion

In conclusion, the draft decision, and its associated conditions, particularly conditions 3(e) and 5 we believe pose risks to Dublin Airport's operations and Ireland's economic future. We strongly urge ABP to:

- Reexamine the process and methodology underpinning the draft decision, ensuring compliance with the 2000 Act, the 2019 Act, and EU Regulation 598.
- Remove the restrictions on North Runway use (condition 3(e)) and the ATM night limit (condition 5).

Thank you for considering this submission.

Yours sincerely,

Peter Byrne

CEO

South Dublin Chamber

Whitestown Business Park,

Tallaght

D24K59A

Dublin 24