

File With

SECTION 131 FORM

Appeal No

ABP— 314685-22

Defer Re O/H

☐

Having considered the contents of the submission dated/received 14/12/2023
from Airlines for America 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 new material issues

Section 131 not to be invoked at this stage.

☒

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

☐

Signed

Pat B.

Date

15/12/2023

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



Planning Appeal Online Observation

Online Reference
NPA-OBS-002981

Online Observation Details

Contact Name
Keith Glatz

Lodgement Date
14/12/2023 14:06:37

Case Number / Description
314485

Payment Details

Payment Method
Online Payment

Cardholder Name
Rachel Roberts

Payment Amount
€50.00

Processing Section

S.131 Consideration Required



Yes — See attached 131 Form



N/A — Invalid

Signed

Pat Glatz

EO

Date

15/12/2023

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG— 068821-23

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_3ONFYfB1CW0EN5FC0LbiJ8Bw

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



Airlines for America®

We Connect the World

December 14, 2023

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

**Re: Dublin Airport / Fingal County Council – An Bord Pleanála Case reference:
PL06F.314485 / Planning Authority Case Reference: Fingal County Council
F20A/0668**

Dear An Bord Pleanála,

Airlines for America (A4A),¹ on behalf of its members, appreciates the opportunity to comment on the additional information submitted to An Bord Pleanála (ABP) by the Dublin Airport Authority (daa) in relation to the North Runway appeal. American, Delta, United and our associate member, Air Canada, provide combination services from North America to Dublin Airport (DUB); while JetBlue will begin service to DUB in March 2024. FedEx and UPS provide extensive all-cargo and express services connecting DUB to both North America and Europe. On behalf of our members, we would like to voice our strong support for implementation of the proposed noise quota system (NQS) at DUB.

A4A members are strongly committed to reducing noise impacts on local communities. We have a strong vested interest in the creation of a night-time regulatory regime that sets out clear rights and responsibilities as well as strikes a balance between the interests of all stakeholders, including local communities, airlines, shippers, passengers, employees and the broader Irish economy. DUB is a key driver in the Irish economy. This was highlighted in the daa's recently published Economic Impact Study 2023 which noted that DUB provides a €9.6 billion GVA (gross value added) contribution to the Irish economy.² A 2020 study conducted by York Aviation³ noted that DUB handled 90 percent of Ireland's air freight annually, which accounted for 35 percent of Ireland's trade by value. Of that freight, 38 percent flew at night, accounting for roughly €19 billion in imports and exports.

A4A would like to express our support for a grant of permission for the development in line with the Aircraft Noise Competent Authority (ANCA) determination. By way of background, ANCA

¹ A4A is the principal trade and service organization of the U.S. scheduled airline industry. Members of the association are Alaska Airlines, Inc.; American Airlines Group, Inc.; Atlas Air, Inc.; Delta Air Lines, Inc.; Federal Express Corporation; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

² https://www.dublinairport.com/docs/default-source/corporate/economic-impact-study-draft-3.pdf?sfvrsn=cb3175b6_8

³ <https://www.dublinairport.com/docs/default-source/north-runway-downloads/ftai-economic-impact-of-cargo-night-flying-2020.pdf>

published its decision regarding appropriate noise mitigation and operating conditions to apply to DUB in June 2022. These proposals include replacing Planning Condition 5 (65 flight cap) with an Annual Noise Quota for the full night period (23:00 to 07:00), that the North Runway shall not be used for takeoff or landing between 00:00 and 05:59 (from 23.00 to 07.00 previously), and an introduction of a noise insulation grant for the affected communities.

A4A supports the NQS for individual flights as it offers airlines with needed operational flexibility compared to a fixed movement limit for managing airport noise. Since a movement limit does not differentiate between quieter and noisier operations, the qualitative benefits of such an approach are inherently less than those of the proposed NQS, which will provide a clear data-driven framework in which the airport, affected communities and carriers can manage operations.

A4A would like to highlight the importance of a timely ABP decision in this proceeding. This case has been pending within the planning system for three years and as noted earlier, the airport and the night-time use of the runway is of strategic national importance.

We thank you for your kind attention. Please do not hesitate to contact me if you have any questions or require further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Glatz', with a stylized flourish at the end.

Keith Glatz
Senior Vice President, International Affairs
Airlines for America
1275 Pennsylvania Ave, NW
Suite 1300
Washington, D.C. 20004
United States of America