

SECTION 131 FORM

File With _____ S. 37

Appeal NO: ABP 314485

TO: SEO

Defer Re O/H ☐

Having considered the contents of the submission dated/ received 23/12/24
from Aidan ~~Conaty~~ I recommend that section 131 of the Planning and Development Act, 2000
is/not be invoked at this stage for the following reason(s): no new issues

E.O.: [Signature]

Date: 21/1/25

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 FORMAppeal No. ABP 314485Please treat correspondence received on 23/12/24 as follows:

. Update database with new agent for Applicant/Appellant _____

. Acknowledge with BP 23. 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 Recd

4. Attach to file

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

James Sweeney

From: Appeals2
Sent: Monday 23 December 2024 14:58
To: James Sweeney
Subject: FW: 314485 Appeal of Relevant Action Draft Decision
Attachments: 314485 Appeal Aidan Conaty.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

From: Aidan Conaty <aidanconaty@gmail.com>
Sent: Monday 23 December 2024 07:32
To: Appeals2 <appeals@pleanala.ie>
Subject: 314485 Appeal of Relevant Action Draft Decision

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear An Bord Pleanala,

Please find attached my submission to case 314485 appeal
Below are the yey boords

Introduction

The Inspector's Report has determined that the negative effects of the proposed action on local communities are too severe to warrant approval. The request to extend operational hours on the north runway, coupled with an expected increase in night-time activities, would lead to significant disturbances in sleep patterns. Such disturbances have been linked to serious health issues, including increased risks of cardiovascular diseases, mental health problems, and sleep-related cognitive declines.

Given these findings, it is crucial that any expansions of airport activities during night-time hours be either prohibited or, at the very least, strictly limited to a cap of 13,000 annual night-time flights as suggested.

Operations proposed on the north runway from 6 AM to midnight are deemed to pose unacceptable health and quality of life risks, particularly causing severe and unreasonable sleep disruptions for residents and families already affected by the north runway flight paths.

Key points of concern regarding the DAA application include:

1.0 DAA Application Shortcomings:

- The application by the Dublin Airport Authority (DAA) does not adequately address or mitigate the negative impacts of night-time noise. Metrics such as % Highly Sleep Disturbed (HSD) and Lnight do not account for specific issues like awakenings, which can have immediate and lasting health effects.
- The inspector has identified that any increase in awakenings due to aircraft noise that exceeds one per night constitutes a significant adverse impact.

2.0 Insulation Limitations:

- Insulation measures fall short in mitigating night-time noise due to factors like open windows, low-frequency sounds, and peak noise events. The WHO's average insulation value of 21 dB is based on an assumption that windows are open 20% of the year, reducing the effectiveness of such measures.
- The new insulation standard of 80dB LASMax is a positive step, but the lack of detailed maps to determine eligibility renders the decision incomplete.
- The proposed insulation grant of €20,000 is insufficient to fully cover the costs for eligible homes, especially considering the high construction costs in Dublin and Ireland. The scheme needs to be restructured to cover the full insulation costs.
- Current insulation schemes like the Residential Noise Insulation Scheme (RNIS) and Home Sound Insulation Program (HSIP) do not meet modern health protection standards and are inadequate for addressing night-time noise.

3.0 Essential Movement Cap and Rejection of Extended North Runway Hours:

- The cap of 13,000 night-time flights is essential for reducing noise impact and safeguarding public health. Without this cap, noise exposure will significantly increase, compromising the well-being of nearby residents.
- Extending operational hours from 6 AM to 7 AM and from 11 PM to midnight on the north runway is unacceptable. These additional hours would exacerbate the distress and sleep disruption for thousands in the Fingal and Meath areas due to north runway flight paths.

4.0 Unauthorized Flight Paths and Planning Condition Violations:

- The DAA has implemented flight paths that significantly deviate from those approved in the Environmental Impact Statement (EIS), exposing new areas to considerable noise impacts and creating unassessed risks.
- These deviations are a breach of the planning permission's Condition 1, which mandates adherence to the originally assessed flight paths. No revised Environmental Impact Assessment (EIA) or planning application has been submitted for these changes, affecting communities and local schools severely and undermining the planning system's integrity.

5.0 Night Flight Restrictions in Europe and Implications for Dublin:

- Compared to major European airports like Schiphol, Heathrow, and Frankfurt, which enforce strict caps or curfews on night-time flights, Dublin's proposed cap of 31,755 annual night-time flights is excessively high.
- European airports emphasize noise reduction to mitigate sleep disturbances, cardiovascular risks, and stress, advocating for a movement cap that aligns Dublin with international best practices for sustainable and proportionate operations.

6.0 Health and Environmental Impacts:

- Chronic exposure to night-time aircraft noise heightens the risk of cardiovascular diseases, hypertension, and mental health issues, and negatively affects children's cognitive development.
- The financial impact in terms of healthcare costs and lost productivity is significant, with potential costs at Dublin mirroring those analyzed for Brussels Airport, which could amount to €750m annually.
- The DAA's impact assessments using incorrect population datasets underestimate the actual impact on surrounding communities, contradicting health agency warnings about noise-induced sleep disturbances as a major environmental health risk.

7.0 Recommendations:

- Immediately halt unauthorized deviations and revert to the original EIS-approved flight paths.
- Maintain or consider lowering the cap on night-time flights to 13,000 to prevent further health and well-being degradation in affected communities. A complete ban on night-time flights should also be strongly considered given the severity of potential health and environmental impacts.
- Implement a Noise Quota System to promote the use of quieter aircraft and ensure operations remain within acceptable limits.
- Reject any additional operational hours on the north runway due to the outlined reasons.

Regards

Aidan Conaty

To: An Bord Pleanála

Re: Appeal of Relevant Action Draft Decision

Case Number: 314485

Contact Details:

Name	Aidan Conaty
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Date	22.12.2024

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