

File With

SECTION 131 FORM

Appeal No

ABP— 314485-22

Defer Re O/H

To

SEO

Having considered the contents of the submission dated/received 2 / 10 / 2022
 from TERESA SWEENEY 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 issues raised

Signed

Date

EO

To

EO

Section 131 not to be invoked at this stage.

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

Signed

Date

SEO

Signed

Date

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

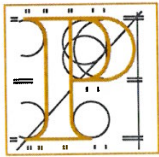
Date

EO

Signed

Date

AA



An
Bord
Pleanála

Planning Appeal Online Observation

Online Reference

NPA-OBS-001346

Online Observation Details

Contact Name
Teresa Sweeney

Lodgement Date
02/10/2022 22:22:49

Case Number / Description
314485

Payment Details

Payment Method
Online Payment

Cardholder Name
Stephen Smyth

Payment Amount
€50.00

Processing Section

S.131 Consideration Required

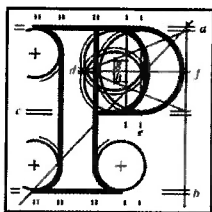
☐

Yes — P.T.O.

☐

N/A — Invalid

Signed



An
Bord
Pleanála

Observation on a Planning Appeal: Form.

Your details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

Your full details:

(a) Name

Teresa Sweeney

(b) Address

Newpark, The Ward, Co. Dublin, D11EF2R

Agent's details

2. Agent's details

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Not applicable

(b) Agent's address

Not applicable

Postal address for letters

3. During the appeal process we will post information and items to you **or** to your agent. For this observation, who should we write to? (Please tick ✓ one box only.)

You (the observer) at the address in Part 1

☒

The agent at the address in Part 2

☐

Details about the proposed development

4. Please provide details about the appeal you wish to make an observation on. If you want, you can include a copy of the planning authority's decision as the observation details.

(a) Planning authority

(for example: Ballytown City Council)

Fingal County Council

(b) An Bord Pleanála appeal case number (if available)

(for example: ABP-300000-19)

PL06F.314485

(c) Planning authority register reference number

(for example: 18/0123)

F20A/0668

(d) Location of proposed development

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Dublin Airport, Co Dublin

Observation details

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

We support the current appeals lodged with An Bord Pleanála and wish to add the following comments listed below.

1.0 DETRIMENTAL HEALTH IMPACTS OF NIGHTTIME FLIGHTS

The application for night time flights at Dublin Airport has failed to properly determine the impact of sleep interruptions on the local community. From personal experience I am currently living under a flight path that does not have planning permission .

Figure 1 illustrates the actual flight paths above my house since the North Runway became operational versus the flight paths being proposed by the DAA in this application. The wide area that is now under a flight path is completely different to the flight paths put forward by the DAA in their application.

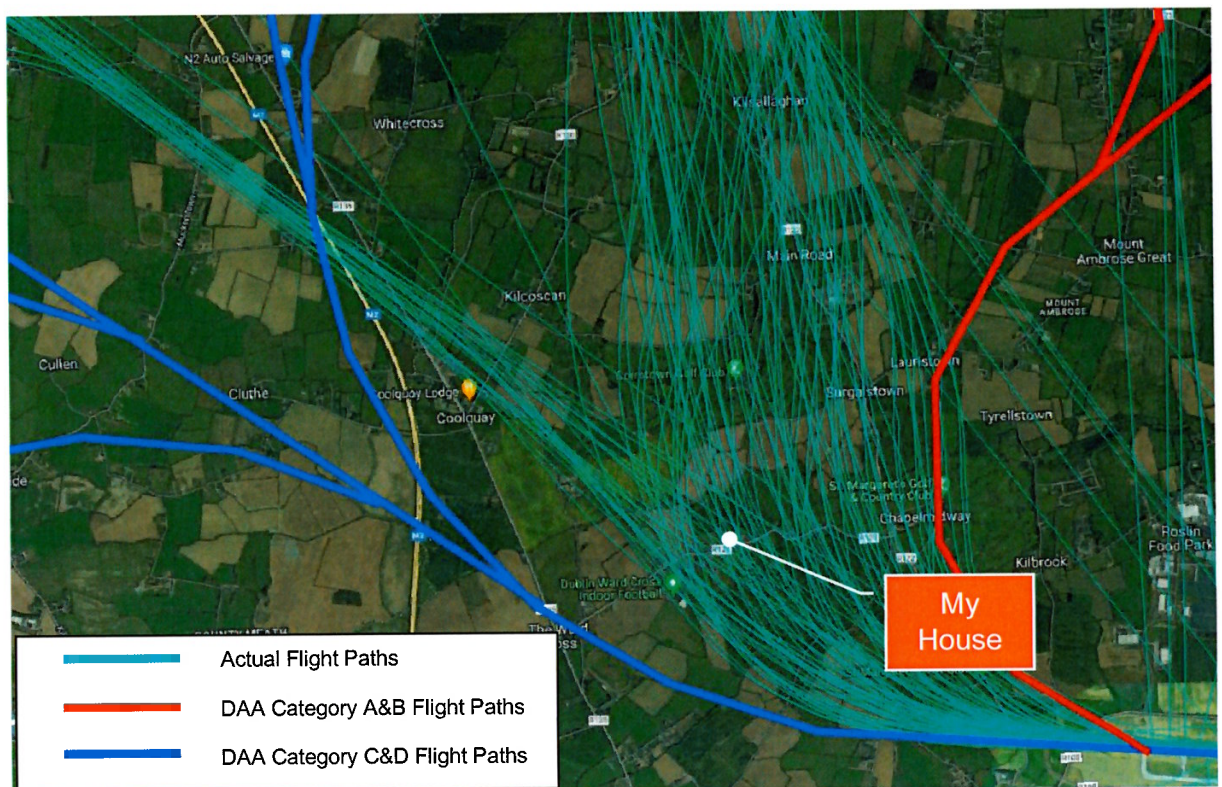


Figure 1 Actual Flight Paths versus DAA EIAR Flight Paths at My House

Having examined the DAA's application I cannot find that they have undertaken any assessment of the health impacts of interrupted sleep from night time flights. This should be a fundamental assessment to be undertaken, considering how important sleep is to a person's health.

I am a doctor and I understand both the acute and chronic detrimental affects of disturbed sleep. I'm worried for my health and my children's health. The DAA are failing to consider children who need additional sleep and shift workers such as myself. It has been established that reduced sleep duration has been linked to 7 of the 15 leading causes of death in the U.S., including cardiovascular disease, malignant neoplasm, cerebrovascular disease, accidents, diabetes, septicemia, and hypertension (Kochanek K.D., 2014).

I ask An Bord Pleanála to refuse permission on the basis that the EIAR submitted by DAA is in fact inadequate in terms of the assessment it has conducted on the negative health impacts of the North Runway.

2.0 INADEQUATE PUBLIC CONSULTATION

The DAA are currently flying planes over my house and generating noise levels in excess of 90dB. I was never consulted with in regard to having a flight path over my home or any insulation at my property or how this proposal would impact me. In fact all documents from the DAA prior to the opening of the North Runway indicated that I would not be under a flight path. An Bord Pleanála should refuse permission on the basis that there was inadequate public consultation and frankly false information submitted by DAA to both the planning authority and the local community.

3.0 NEED FOR THE DEVELOPMENT

We are currently in a climate crisis and the emphasis should be placed on reducing flights as opposed to increasing flights to protect our planet for future generations. It would appear to me that the motivation for this development is greed and economic gain without consideration for the environment and future generations.

Do the DAA actually need this many flights at night? Heathrow is currently limited to 5,800 night-flights per year which equates to ~15 flights per night. DAA are asking for 31,885 night-flights per year which equates to ~87 flights per night. Heathrow one of the largest airports in the world can operate with a limit on night flights and I would argue that Dublin Airport should be capable of the same.

An Bord Pleanála should refuse permission on the basis of the application being unnecessary.

4.0 QUOTA SYSTEM

The DAA are requesting a noise quota system for night flights instead of a movement limit. The noise quota that they have selected is 16,260 which is many multiple of the noise quota at other international airports. The following table compares the DAA proposal to what London airports operate.

Table 1: Summary of Noise Quota Scheme for London Airports and the proposed for Dublin

		Movement Limit	Noise Quota Limit	Ban on QC4 rated aircraft	TimePeriod
Heathrow	Winter	2,550	2,415	Yes	23:30 – 06:00
	Summer	3,250	2,735		
Gatwick	Winter	3,250	1,785	Yes	23:30 – 06:00
	Summer	11,200	5150		
Stansted	Winter	5,600	3,310	Yes	23:30 – 06:00
	Summer	8,100	4,560		
Dublin	Winter	None	6,260	Yes	23:00 – 07:00
	Summer				

The quota being proposed by the DAA without any movement limit would allow them to operate by their own admission over 31,000 flights at night by the year 2035.

This would be hugely detrimental to the health and wellbeing of the local community. The DAA should be reminded that the people living in our community are human beings. We do not hear noise as an average. Instead we hear every flight as an individual event. The more flights you have the more often we will be awakened from our sleep.

I ask An Bord Pleanála to refuse permission for the Quota Count system and instead replace it with a simplified movement limit for each night. This would be easy to police and would provide certainty to the local communities that aircraft movements at night will not increase over time which is precisely what the Quota Count system allows.

5.0 NEED FOR REEXAMINATION OF NOISE CONTOURS AND COMPLIANCE DOCUMENTS PUBLISHED TO DATE

Fingal Co Co and the Aircraft Noise Competent Authority have been misled by the DAA and given false information. This is evident from noise measurements at my property. It is also evident from the illegal flight paths they are operating currently. The DAA have failed to comply with the current planning permission that they have. They should be subject to the same planning law that every other individual in this country is subject to. They should display compliance with the current planning permission before any new planning permissions are considered.

An Bord Pleanála should refuse permission on the basis of disregard for planning laws and the local community.

In conclusion I request that permission is refused for this relevant action application on the basis that it will seriously impact on the health of communities closest to the airport and adequate mitigation has not been provided by the applicant.

I also support the request for an Oral Hearing.

References

Kochanek K.D., M. S. (2014). Mortality in the United States. *NCHS Data BriefS*, 178:1–8.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

Fee

7. You **must** make sure that the correct **fee** is included with your observation. You can find out the correct fee to include in our [Fees and Charges Guide](#) on our website.

This document has been awarded a Plain English mark by NALA.
Last updated: April 2019.

