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SECTION 131 FORM

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Planning Appeal Online Observation

Online Reference NPA-OBS-001380

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Contact Name Ian Carey Lodgement Date 03/10/2022 17:01:47

Case Number / Description

314485

Payment Details

Payment Method Online Payment Cardholder Name lan Carey

Payment Amount

€50.00

Processing Section

S.131 Consideration Required

Yes — P.T.O. N/A — Invalid

Signed



Rowan House, Newtown Cross, The Ward, Co Dublin D11C623

Observation: Case reference: PL06F.314485

03/10/2022

To whom it may concern,

Please accept the following observations in relation to the above case.

- 1. Health impact of the changes is not sufficiently studied Neither ANCA nor the daa have evaluated the serious health effects and costs associated with such health effects of their proposed modification to the current restrictions in place at Dublin Airport. This has serious health implications for the impacted communities. The WHO guidelines relating to Noise published in 2018 detail growing evidence of the health impact of aircraft noise. As this application seeks to increase exposure to aircraft noise detailed studies of the impact should be carried out so that it can be more effectively mitigated.
- 2. Current operations at odds with proposed changes Since August, when the North Runway opened under the existing planning conditions, it has operated in a way that is not consistent with projections in the planning documents. The noise contour mapping, the maps relating to the insulation programme, and the EIAR maps are no longer correct. Aircraft taking off from the north runway have take divergent routes 308 and 339 degrees after 650ft and this is not consistent with the impacts mapped under the EIAR. The EIAR has analysed the impact of divergent flight routes that happen after 1.2 nautical miles not 650ft in altitude. If this operational approach continues it will render all planning documents incorrect.
- 3. Change will have significant climate impact
 Aviation will need to achieve significant reductions in GHG emissions in the medium term to stay on a
 pathway to net zero by 2050. The EIAR uses the Permitted Scenario as the baseline for the GHG
 emissions assessment. By using the Permitted Scenario as the baseline, the EIAR is giving the
 impression that the Permitted Scenario is acceptable. This is not the case as even with the
 Permitted Scenario, GHG emissions will rise. This conflicts with the Government policies to
 reduce GHG emissions by 51% by 2030. The EIAR should take account of future reduction targets and
 use methodologies that take that into account. Based on the analysis of ATM differences between the
 Proposed and Permitted scenarios in 2035 and 2040 with the passenger cap removed, it is a safe
 assumption to say that GHG emissions will rise between 8.5 10% as a result of the Relevant Action.
 The documents also disregard the impact of non-CO2 forcing. There is no legitimate reason to



disregard the impact of this. The UK CCC advises that 'globally, non-CO2 effects contribute around two-thirds of the total aviation effective radiative forcing – twice as much as historical CO2 emissions from aviation'.

I believe that the issues raised here and those outlined in the appeal are of national significance and importance and an oral hearing to air these would be appropriate.

Yours Sincerely,

Cllr Ian Carey