

File With _____

SECTION 131 FORM

Appeal NO: ABP 314488Defer Re O/H ☐

TO: SEO

Having considered the contents of the submission dated/ received 23/12/24
fromRobert J Beyer 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 more issuesE.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 FORM

Appeal No: ABP 314485

M _____

Please treat correspondence received on 23 / 12 / 24 as follows:

- | | |
|--|--|
| 1. Update database with new agent for Applicant/Appellant _____
2. Acknowledge with BP <u>23</u>
3. Keep copy of Board's Letter <input type="checkbox"/> | 1. RETURN TO SENDER with BP _____
2. Keep Envelope: <input type="checkbox"/>
3. Keep Copy of Board's letter <input type="checkbox"/> |
|--|--|

Amendments/Comments

Resp to Draft decision

4. Attach to file

- | | |
|---|---|
| (a) R/S <input type="checkbox"/> | (d) Screening <input type="checkbox"/> |
| (b) GIS Processing <input type="checkbox"/> | (e) Inspectorate <input type="checkbox"/> |
| (c) Processing <input type="checkbox"/> | |

RETURN TO EO ☐
Plans Date Stamped ☐
Date Stamped Filled in ☐
EO: [Signature]

AA:

Date: 2 / 1 / 25Date: 2 / 1 / 25

Alfie Staunton

From: Robert Beyer <robertbeyer12@gmail.com>
Sent: Monday 23 December 2024 13:43
To: Appeals2
Subject: Robert J Beyer observation 314485

Follow Up Flag: Follow up
Flag Status: Completed

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.

To: An Bord Pleanála
Re: Appeal of Relevant Action Draft Decision
Case Number: 314485

Robert J Beyer
Kilkoscan
The Ward
Co. Dublin

robertbeyer12@gmail.com

23 December 2024

To Whom it Concerns:

The DAA, a state-owned entity, has been operating contrary to approved planning permission since August 2022. This has been ongoing for over two years. It is a blemish on Ireland that TDs have selected a London investment banker to chair the DAA board. This same London investment banker has written letters to the then Taoiseach advocating for the airport's continued operation contrary to granted permission. This London investment banker encourages DAA management to operate outside of granted permissions and this London investment banker refuses to meet with local communities adversely impacted by the DAA actions. It is disgraceful that the Irish government has not intervened to stop these shenanigans perpetrated by a state owned organization.

Perhaps Ireland is a country with two-tier planning. One set of permissions for the powerful, politically connected elite and another set of rules for ordinary people.

For the third Christmas in a row, families in North County Dublin and Meath are spending their time reading, researching, and responding to a DAA planning application. The timing of these applications shows the DAA's deep cynicism, hoping that fewer people will object during the holiday season.

The DAA bullies its way to get what it wants, disregarding ordinary people. It operates outside of planning restrictions, pretends to engage with the community, and submits planning applications with dubious timing.

For over two years, we have spent our nights and weekends learning about airport operations, pollution concerns, and flight patterns. We have educated our neighbours and organized our communities against this Goliath bully. This is time we could have spent with our families, working on our careers, or caring for elderly parents.

It is disgraceful that the Irish government has allowed this to continue. The DAA does not pay its fair share for the external costs it imposes on the Irish economy, such as air pollution, carbon pollution, heavy metal pollution, and sound pollution. These external costs reduce the health, productivity, and standard of living for those living near the airport, especially those under the illegal flight paths.

The talk of decibel levels and insulation as a solution does not even begin to paint the full picture. Living under the flight path with Boeing 777s flying one thousand feet over my house, I can tell you that no amount of insulation will be effective. The garden shakes, the ground shakes, my walls and windows shake, and my kids' desks and beds shake. Extending the airport's hours so that night operations run from 12 am to 6 am will ruin our community. Can you imagine flights every minute from 6 am to 12 am? This is what is coming to our community unless the government stands up for ordinary people. When are our kids supposed to sleep?

The people pushing for airport growth do not care about Ireland; they only care about their own pockets. Let's see whose side the government takes. It will be telling.

Specific observations follow:

Introduction

The Inspector's Report has rightly concluded that the adverse impact of the Relevant Action on the surrounding communities would be too severe to justify granting permission. The proposal's request for additional hours of operation on the north runway and a projected increase in night-time activity would result in significant additional awakenings, which are well-documented to cause substantial health and well-being consequences, including increased risks of cardiovascular disease, mental health disorders, and sleep-related cognitive impairments.

Given these findings, it is essential that any current or future expansion of airport activity during night-time hours be disallowed but at the very least strictly limited by a movement cap of 13,000 annual night-time flights, as proposed.

Proposed operations on the north runway from 6am to midnight presents unacceptable risks to health and quality of life, and in particular will cause further catastrophic and unreasonable sleep disruption for residents and families already suffering due to north runway flight paths.

The following summary points highlights the inadequacies of the DAA application:

1.0 Inadequacy of DAA Application

- The Dublin Airport Authority (DAA) application fails to assess or mitigate the adverse effects of nighttime noise adequately. Average metrics like % Highly Sleep Disturbed (HSD) and Lnight fail to capture acute impacts such as awakenings, which have immediate and long-term health consequences.
- The inspector has defined that more than 1 additional awakening per night as a result of aircraft noise is a significant adverse impact.

2.0 Insulation Limitations:

- Insulation measures cannot fully mitigate nighttime noise due to factors like open windows, low-frequency noise, and peak noise events. The WHO average insulation value of 21 dB assumes windows are open 20% of the year, making insulation less effective.

- The introduction of a new insulation criteria of 80dB LASMax is welcomed, however, without a detailed set of maps indicating who qualifies for this the decision is incomplete.
- The proposed grant value of €20,000 is considered inadequate to fully insulate those homes that qualify. Comparisons to other EU countries are incomplete and do acknowledge the fact that construction costs in Ireland and particularly Dublin are close to the highest in the EU. The scheme should be redesigned to cover the full cost of insulation.
- Residential Noise Insulation Scheme (RNIS) and Home Sound Insulation Program (HSIP) do not meet modern health protection standards. Insulation is unsuitable for nighttime impacts and cannot substitute for operational restrictions like movement caps.

3.0 Necessity of the Movement Limit and Rejection of the Additional North Runway Operating Hours:

- The movement cap of 13,000 nighttime flights is critical to reducing noise impacts and protecting public health. Without this cap, noise exposure levels will rise significantly, endangering the well-being of nearby residents.
- The proposed additional operating hours from 6am to 7am and from 11pm to midnight on the north runway are completely unacceptable. The flight paths in operation from north runway are causing huge suffering, distress and sleep disturbance for tens of thousands of people in Fingal and Meath.
- Adding a further two hours to the schedule when most people are trying to sleep only makes and unreasonable situation even worse. The flightpath issue must be solved firstly before any other changes can be considered. For context, there were 40 departures between 6am and 7am on Monday 16 December 2024. This is the busiest hour of each day at the airport. It would be disastrous if these 40 departures were switched to the North Runway because they would now be taking a divergent turn and flying low (on full power while turning) over communities who should not be under or near to a flightpath. The volume and frequency would be much greater in the summer period.

4.0 Unauthorised Flight Paths and Breach of Planning Conditions

- The DAA has implemented flight paths that deviate significantly from those approved in the Environmental Impact Statement (EIS). These unauthorised deviations expose previously unaffected areas to significant noise impacts, creating unassessed risks.
- The deviations breach Condition 1 of the planning permission, which requires adherence to the originally assessed flight paths. No updated Environmental Impact Assessment (EIA) or planning application has been submitted for these changes.
- Affected communities have and are experiencing unreasonable noise levels without proper consultation or mitigation measures. Local schools have been impacted. The impact has been devastating for communities with families now feeling like they have no option but to sell their homes.
- The unauthorised flight paths undermine the planning system's integrity, setting a dangerous precedent for future projects. Granting permission under these conditions violates planning laws and obligations under the EIA Directive.
- There are multiple possible means of compliance with the pertinent ICAO regulations. IAA has received and approved only the one chosen by daa as Aerodrome Operator.
- Any inference or implication that IAA instructed or caused daa to deviate from the route approved in their planning permission is not correct.

5.0 Night Flight Restrictions in Europe and Implications for Dublin

- Major airports like Schiphol, Heathrow, and Frankfurt enforce strict caps or curfews on nighttime flights. Dublin's proposed 31,755 annual nighttime flights far exceed these airports' limits relative to passenger numbers.
- European airports prioritize reducing noise exposure to mitigate sleep disruption, cardiovascular risks, and stress.

- Adopting the 13,000-flight cap aligns Dublin with international best practices, ensuring proportional and sustainable operations.
- Without the movement limit the Noise Abatement Objective (NAO) set by ANCA for Dublin Airport cannot be fully achieved.

6.0 Health and Environmental Impacts

- Chronic exposure to nighttime aircraft noise increases the risks of cardiovascular disease, hypertension, and mental health issues. Children's cognitive development is adversely affected, impairing memory, learning, and overall performance.
- Health-related costs, including healthcare expenses and reduced productivity, are substantial and long-term. For example, Brussels Airport's health cost analysis suggests similar impacts at Dublin could reach €750m annually.
- The DAA analysis has not used the correct population datasets in determining the impacts. This underestimates the impact on the communities around the airport.
- Evidence from health agencies emphasizes that noise-induced sleep disturbance is a significant environmental health risk. Ignoring these risks contravenes principles of sustainable development and public health protection.

7.0 Recommendations

- Immediately halt unauthorised deviations and revert to the flight paths approved under the original EIS.
- At the very least, maintain the cap of 13,000 nighttime flights to prevent further degradation of community health and well-being, however due to the severity of the projected health and environmental impacts that nighttime aircraft noise presents, a complete ban on night-time flights should be strongly considered.
- Implement the Noise Quota System to incentivize quieter aircraft and ensure proportional operations.
- Reject the proposed additional hours of operation on the north runway for reasons outlined.