

File With _____

SECTION 131 FORM

Appeal NO: ABP 314485

TO: SEO

Defer Re O/H ☐Having considered the contents of the submission dated/ received 23/12/24
fromBrendan Murphy 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 w resultE.O.: [Signature] Date: 23/12/24

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:

1. Update database with new agent for Applicant/Appellant _____

2. Acknowledge with BP 233. Keep copy of Board's Letter ☐

1. RETURN TO SENDER with BP _____

2. Keep Envelope: ☐3. Keep Copy of Board's letter ☐

Amendments/Comments

4. Attach to file

(a) R/S ☐(b) GIS Processing ☒(c) Processing ☒(d) Screening ☐(e) Inspectorate ☐RETURN TO EO ☐EO: [Signature]Date: 23/12/24Plans Date Stamped ☐Date Stamped Filled in ☐AA: F. KhoprasDate: 24/12/24

Alfie Staunton

From: Brendan Murphy <brendan.murphy53@gmail.com>
Sent: Monday 23 December 2024 14:17
To: Appeals2
Subject: Submissions and observations re Draft Development plan Case Number ABP-314485-22

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 Sir/Madam

Brendan Murphy

464 Strand Road,

Portmarnock

Co Dublin

D13RF22

Brendan.murphy53@gmail.com

Date 23rd December 2024

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Introduction

Submissions and observations re Draft Development plan Case Number ABP-314485-22

I have lived in Portmarnock since 1979 and have had to endure increased aircraft noise levels due to

- the opening of the south runway
- the opening of the north runway and
- the increase in aircraft traffic.

During the day time it is a nuisance but the night time is a completely different scenario as getting a proper night's sleep is very difficult due to aircraft noise levels.

While I have upgraded windows/insulation to help reduce but not eliminate the noise impact, leaving them closed particularly in warm weather is not an option. This leads to very broken sleep patterns, difficulty getting to sleep and waking early in the morning particularly if the aircraft are taking off in an easterly direction.

Night-time operations present unacceptable risks to health and quality of life, and the evidence strongly supports minimising or eliminating such activity to meet public health and sustainability goals

PEOPLE SHOULD BE ABLE TO GET A DECENT NIGHTS SLEEP.

LACK OF SLEEP HAS SERIOUS HEALTH IMPLICATIONS.

1.0 Inadequacy of DAA Application and Necessity of Movement Limit

The Dublin Airport Authority (DAA) application fails to assess or mitigate the adverse effects of night-time noise adequately. The WHO highlights that even one additional awakening per night represents a significant adverse health impact. The permission should be denied due to the DAA's insufficient noise mitigation measures and failure to address core public health risks.

2.0 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. Permission should be unequivocally denied until unauthorised flight paths cease and comprehensive reassessments are completed.

3.0 Right of Appeal in the Aircraft Noise Act 2019

Denying appeals undermines public trust and violates the Aircraft Noise Act's intent to provide affected parties a voice.

4.0 Noise Quota System in the Fingal Development Plan

I am concerned that the system used to monitor aircraft noise at Dublin airport (WebTrak) is under the control of the DAA. This to me is a serious conflict of interest. Notwithstanding this Enforcing a movement limit alongside the NQS to ensure it effectively reduces noise disturbances.

This system should align with best practices observed at major European airports.

5.0 Night Flight Restrictions in Europe and Implications for Dublin

Major airports like Schiphol, Heathrow, and Frankfurt enforce strict caps or curfews on night-time flights. Dublin's proposed 31,755 annual night-time flights far exceed these airports' limits relative to passenger numbers. The proposed number of flights is disproportionate and poses unacceptable health and environmental risks especially during night time.

6.0 Inadequacy of Insulation in Mitigating Aircraft Noise-Induced Awakenings

As already stated in my introduction insulation does not address critical noise issues. Insulation alone cannot mitigate night-time noise impacts; operational restrictions must remain central to mitigation strategies

7.0 Health and Environmental Impacts

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

8.0 Other Environmental Impacts

The DAA constantly underestimates the impact of noise and carbon/chemical pollution on communities around the airport. Ignoring these risks contravenes principles of sustainable development and public health protection

The Appropriate Assessment (AA) relied on outdated ecological surveys that do not accurately reflect current environmental conditions. Failure to update surveys undermines the validity of the assessment and risks overlooking critical impacts on local habitats and species. The lack of thorough assessment could lead to significant unmitigated impacts on protected habitats and species, including cumulative degradation of local ecosystems

9.0 Recommendations and Final Position

- **Cease Unauthorised Flight Paths:**
 - Immediately halt unauthorised deviations and revert to the flight paths approved under the original EIS.
 - Conduct a new EIA to assess the impacts of any proposed deviations.
- **Retain Movement Limit:**
 - Maintain the cap of 13,000 night-time flights to prevent further degradation of community health and well-being.
 - Implement the Noise Quota System to incentivize quieter aircraft and ensure proportional operations.

- **Refuse Permission:**

- Granting permission under these circumstances undermines planning integrity and public trust.
- Upholding planning law and ensuring transparent, evidence-based assessments are essential for future airport operations.

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Regards

Brendan Murphy
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