

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 Flora Irwin 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

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.: _____

S.A.O.: _____

Date: _____

Date: _____

M _____

Please prepare BP submission _____ - Section 131 notice enclosing a copy of the attached
to: _____

Allow 2/3/4 weeks – BP _____

EO: _____

Date: _____

A: _____

Date: _____

S. 37

File With _____

CORRESPONDENCE FORMDeal No: ABP 314485Please treat correspondence received on 23/12/24 as follows:

Update database with new agent for Applicant/Appellant _____

Acknowledge with BP 23Keep 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 ☐EO: [Signature]Date: 21/1/25Plans Date Stamped ☐Date Stamped Filled in ☐AA: F. KhodjaniDate: 21/1/25

Alfie Staunton

From: Fiona Irwin <fionamary.irwin@gmail.com>
Sent: Monday 23 December 2024 11:20
To: Appeals2
Subject: ABP-314485-22
Attachments: Dec24appealtoABP.docx

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,

Please find attached my submission about the Draft Decision, case number ABP-314485-22.

Many thanks.

Regards.

Fiona Irwin

Tobergregan

Garristown

Co Dublin

To: An Bord Pleanála

Re: Appeal of Relevant Action Draft Decision

Case number: ABP-314485-22

Contact details:

Fiona Irwin

Tobergregan, Garristown, Co. Dublin

fionamary.irwin@gmail.com

21.12.24

A Chara,

I would like to make a submission with regard to the Draft Decision above.

Overall, the decision is a source of profound disappointment.

Re: points b,c,d, page 6, under Appropriate Assessment, I would like to provide some context to my appeal to an Bord Pleanála, and the reasons why the decision to Grant is so distressing. I live in an area not previously overflowed by aircraft at low altitude, until the opening of the North runway. We are at some distance from the airport, about equivalent to the distance that residents of Rathmines, Terenure, Ranelagh, etc, are from the airport. The current situation has resulted in a complete change in our environment, a huge amount of disturbance and noise that was unanticipated when the North runway was given planning permission.

I know from discussing the noise and change with friends who live in other areas of Dublin that much of the population is oblivious to this, because it does not affect them. When a flight bound for North America passes directly over our house at under 4,000 ft., the noise will stop an outdoor conversation. It is loud inside the house with windows closed. If other parts of the city experienced this, there would be uproar, and a demand for change. It is easy to dismiss when it's happening to someone else. The whole Decision to Grant document shows the same obliviousness to our situation.

We have the additional, more frequent noise, of flights taking off from the North runway heading for all other destinations. In August, according to the DAA's figures, (DAA Monthly Noise and Operations Report) there were 307 westerly takeoffs per day from the North runway. That is a flight on average every 3 minutes. So every flight heading for London, Dubai, Tenerife, Lisbon and all other destinations into a westerly wind, does an acute right turn off the North runway and then an arc over our villages of Fingal and East Meath, before heading east. This fact is not obvious or perhaps of importance to the flying public. However, it has a huge impact on those overflowed. Most of us affected by aircraft noise live outside the zones which are being offered mitigation such as sound-proofing. If a higher frequency of flights is proposed with expansion of operating times, the impact would be much more profound.

It is simplistic, and misrepresents the experience on the ground, to try and classify the nuisance value by quantifying people as Highly Annoyed and Highly Sleep Disturbed. (page 7 and page 16,

under Noise Performance Reporting). This is often measured by looking at official complaints. Presumptions can be made based on theoretical decibel level. However, what recourse do we have when it is not the exceptional flight that is causing noise and distress, but all of them?

The existing flightpaths are a critical factor in the noise we are experiencing. They differ significantly from those for which planning was obtained in 2007. If, as indicated then, airplanes flew a 5-mile straight path before banking, they would be at a much higher altitude over open countryside before turning. This would make a big difference in sound impact. I cannot find any reference to illegal flight paths in this Draft Decision document. This needs to be addressed urgently, as it has a bearing on all impacts of increased operating hours and nighttime movements.

This is the baseline with which we are currently dealing, and which we had hoped to see changed. It is a cause of great distress to think that permission would be granted to enable North runway departures to start at 6 a.m. and continue till midnight. It is even more worrying to think that numbers of night flights would increase, causing sleep disturbance and repeated waking. It is a complete cop-out for the DAA to suggest noise quotas in this context, as this would not stop flights from repeatedly waking us up. Only a well-monitored cap on night flights would manage the situation.

Re: Greenhouse emissions (page 7, paragraph 2). In the context of recent warnings from the Irish Fiscal Advisory Council, all Irish commercial, industrial, farming and domestic sectors will soon be obliged to start cutting emissions in a very deliberate and targeted way. Their estimates project fines of 20 billion from not meeting our targets. How does it fit with this sobering projection that the DAA does not factor in curtailment of emissions, rather than increasing them? This is the most vague paragraph in the document, with no measures that can be relied upon to mitigate the impact of an increase in activity, and no details about climate-friendly fuels or new scheduling. I do not see how the paragraph can conclude saying that 'the long-term impact on the climate is considered to be of minor significance'. By whom? On what grounds? In essence, this point is brushed aside.

We are being asked to forfeit peace and quiet for higher levels of activity and increased passenger numbers at Dublin airport. There is an unquestioned consensus that greater airport activity is an undeniable positive for Ireland. We are told that there are limits imposed by the passenger cap that are supposedly preventing people flying more frequently. But there are no passengers stranded due to this. There is no clamour for more destinations for Irish people to fly to, except from tour operators and airlines. On the contrary, I receive daily emails from one or more airlines offering a range of destinations that I hadn't thought of. What we are seeing is relentless marketing to generate demand, and hence profit.

Much of the increased capacity being sought is to fly Irish people to foreign destinations to spend their money overseas. There is no reciprocal demand for people e.g. in sunny Spain or the Canaries to visit here.

In the U.K., it has been shown in a 2023 study (New Economics Foundation: <https://neweconomics.org/2023/07/boom-in-air-travel-fails-to-increase-uk-productivity-or-gdp-growth>) that a fast-growing air travel industry is creating a travel spending deficit, with £32 billion more flowing out of the UK than flows in through foreign visitors.

There is an equality issue at stake here too. The affluent travel more frequently than most. In the U.K., for instance, roughly 50% of the population does not participate in travel in any given year, while 15% of the population is responsible for 70% of all flights. (Hopkinson and Cairns, 2021). This

disparity is even more pronounced in other countries with lower income. This inequality is even more unjustifiable when we see that aviation is heavily subsidised by governments.

It might be interesting to examine, in the case of Ireland, what proportion of flights serve to bring necessary, lucrative tourist revenue in, or provide vital freight services, or facilitate business travel vs. what proportion are simply flying a relatively small proportion of people repeatedly out of Ireland to ski, visit Lappland, follow sports teams, take multiple city breaks, or any of the other departures that spend money abroad rather than here? There are very obvious attempts by the airlines to generate support to allow large increases in passenger numbers, which will be facilitated by expanding the operational hours at Dublin airport, and increasing nighttime flights. Can we say with any confidence that this is of undeniable benefit to the Irish economy?

We have been in our home, in a quiet rural area, for nearly 30 years. It is a cause of great distress that this peace has come to an end. I appeal to An Bord Pleanála to take account of the factors listed above to consider whether allowing the extension of operating hours or allowing more nighttime flights at Dublin airport is sustainable, justifiable on economic grounds, or fair to the communities involved.

To summarise:

I appeal to An Bord Pleanála to see beyond decibel values and box-ticking by DAA and recognise that current operations cause a daily noise pollution issue, and cause sleep disturbance and wakening for tens of thousands of us. The decision to Grant would make it so much worse, by allowing increased operating hours and more nighttime flights. Please reject this development.

It is urgent that the flightpaths currently operated by DAA revert to those in their 2007 planning application. It is incredible that a State body is ignoring the illegality of this, and is unchallenged. It also raises the question of just how many more flights can feasibly take off from the North runway if their ambitions to increase activity are realised. Why is the South runway not used for suitable aircraft throughout the day? Please do not permit DAA to proceed unchallenged with illegal flightpaths by default by granting approval.

DAA have no commitment to Climate Action, as illustrated in this document. Vague statements about future improvements will do nothing to mitigate the emissions that will arise in the next 10 years. On the contrary, their actions facilitate the drive to profit for the airlines and tour operators. Is this what we should expect from a State body? This should be a red flag.