

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 22/12/24
from

Paul + Patricia Mongen 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.: _____

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: _____

S. 37

File With _____

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

. Update database with new agent for Applicant/Appellant _____

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

David Behan

From: Paul Michael Mangan <pmangan@tcd.ie>
Sent: Monday 23 December 2024 10:21
To: Appeals2
Subject: Case Number 314485
Attachments: North Runway Observation 314485.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.

Good Morning,

Attached for your consideration is a document comprising our Observations on this issue.

Paul and Patricia Mangan

Paul Mangan

Pól Ó Mongáin

pmangan@tcd.ie
087 2560475

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

Name Paul and Patricia Mangan
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Contact Number 087 2560475
Email Address pmangan@tcd.ie
Date 23 December 2024

Summary

The proposer seeks to extend the hours of operation on the north runway and proposes an increase in night-time activity. Either of these would result in reduced sleep and increased incidence of night-time sleep disruption. There is significant medical evidence that sleep disruption and sleep deprivation impact adversely on health and well-being. They are known to cause increased risks of cardiovascular disease, mental health disorders, and sleep-related cognitive impairments. In light of the medical evidence, it is essential that any current or future expansion of airport activity during night-time hours be disallowed. Failing that, activities should be subject to the recently proposed movement cap of 13,000 annual night-time flights.

The proposed change of operating hours from 0700 to 2300 to 0600 to 0000 effectively reduces sleeping hours by 25%. This would result in increased exposure to health risks and a diminution in the quality of life for those living under or near the airport flightpaths. Such limited sleeping would be compromised further because of noise induced sleep deprivation and broken sleep during these hours.

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. We endorse wholeheartedly the Inspectors conclusion.

Our Recommendations

- Immediately halt unauthorised deviations and insist that DAA revert to the flight paths approved under the original EIS.

- Implement the Noise Quota System to incentivise quieter aircraft and ensure proportional operations (but linked to a movement limit)
- At the very least, maintain the cap of 13,000 night-time flights to prevent further degradation of community health and well-being. However due to the severity of the projected health and environmental impacts that night-time aircraft noise presents, a complete ban on night-time flights should be strongly considered.
- Reject absolutely the proposed additional hours of operation on the north runway.
- It is vital that An Bórd Pleanála refuses permission for the Relevant Action.

The DAA proposal, supported by airlines and business interests, is aimed at maximising profits at the expense of the health, well-being and quality of life of the population of Fingal and East Meath.

To date DAA has shown blatant disregard for the planning conditions which are set having regard to the interests of all parties. Everyone else has to comply with the terms of a planning permission. Why can DAA evade its responsibility to comply with planning law?

Our issues with the DAA application are set out in more details below:

1 Inadequacy of DAA Application

- The Dublin Airport Authority (DAA) application fails to assess or mitigate the adverse effects of night-time noise adequately. Average metrics such as % Highly Sleep Disturbed (HSD) and Lnight fail to capture acute impacts such as awakenings, which have both immediate and long-term health consequences. ([https://www.europarl.europa.eu/RegData/etudes/STUD/2020/650787/IPOL_STU\(2020\)650787_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2020/650787/IPOL_STU(2020)650787_EN.pdf))

The practice of measuring aircraft noise on an averaged basis is inappropriate and it does not adequately record the "point load" of peak noise and disruption when an aircraft is overhead. No one would argue that flooding has not occurred after extremely heavy rainfall because the increase in average water level over the year was minimal.

- The inspector has defined that more than 1 additional awakening per night as a result of aircraft noise is a significant adverse impact.

(The inspector concluded "in conjunction with the board's independent acoustic expert that the information contained in the RD and the RA does not adequately demonstrate consideration of all measures necessary to ensure the increase in flights during the night-time hours would prevent a significant negative impact on the existing population.")

2.0 Insulation Measures have Limited Effectiveness:

- Insulation measures currently offered provide only limited mitigation. Such measures alone do not fully address night-time impacts as effectively as operational restrictions such as movement caps. Insulation cannot eliminate peak noise sufficiently. The vast majority of domestic dwellings in Ireland are naturally ventilated. The WHO average insulation value of 21 dB assumes windows are open 20% of the year, making insulation less effective. This means that windows have to be opened, admitting noise. The introduction of a new insulation criterion of 80dB LASMax is an improvement. However the areas to be covered by the insulation scheme needs to be extended.
- The Residential Noise Insulation Scheme (RNIS) and Home Sound Insulation Program (HSIP) do not meet modern health protection standards. The insulation scheme should be improved to reduce noise further. The value of the grant should be increased so that it is sufficient to cover the cost of a suitable insulation programme at Irish building costs. The proposed grant value of €20,000 is insufficient to fully insulate those homes that qualify.

3.0 Why do we need a Movement Limit and the Rejection of the Additional North Runway Operating Hours:

DAA wants unlimited night flights without a Noise Quota limit. They and the airlines are concerned only with maximising profit and have demonstrated minimal regard for the impact on residents of Fingal and East Meath and even less regard for the conditions attached to the 2007 Planning Permission.

- A noise quota of itself would be insufficient. It must be linked to a movement limit.
- Increased levels of aircraft movements are damaging to people's health. The movement cap of 13,000 night-time 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.
- Without a strictly enforced movement limit the Noise Abatement Objective (NAO) set by ANCA for Dublin Airport cannot be fully achieved.
- European airports prioritize reducing noise exposure to mitigate sleep disruption, cardiovascular risks, and stress. Major airports like Heathrow, Schiphol, 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.
- Adopting the 13,000-flight cap aligns Dublin with international best practices, ensuring proportional and sustainable operations.

4. Additional Operating Hours

- The proposed additional operating hours from 0600 to 0700 and from 2300 to 0000 on the north runway are completely unacceptable. The flightpaths currently in operation from the 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 an existing unreasonable situation even worse. Currently there can be up to 40 aircraft departures between 6000 and 0700. Similar arrival numbers apply at peak times between 2300 and 0000. If additional operating hours are approved this level of disruption will start 1 hour earlier and finish 1 hour later.

5 Unauthorised Flight Paths and Breach of Planning Conditions

- In addition to the number of aircraft movements and the night-time operating hours, there is also the issue of divergent flightpaths. The DAA has implemented flight paths that deviate significantly from those approved in the Environmental Impact Statement (EIS). These routes, cause additional noise disruption affecting more residential areas than originally indicated. The flightpath issue must be resolved first before any other changes can be considered.
- 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.
- 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.

6. Proposed Retention of Divergent Flight Path:

- Under no circumstances should ABP approve this divergent flight path through mitigation measures. DAA must follow flight path that was granted permission in 2007. The unapproved divergent flight path off the North Runway

currently in use, is causing incredible suffering, distress and sleep disturbance to families that were never to be flown over and DAA don't care.

7 Health and Environmental Impacts

- Chronic exposure to night-time 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.