

File With

SECTION 131 FORM

Appeal No

ABP— 314485 - 22

Defer Re O/H

☐

Having considered the contents of the submission dated received 21/03/2024
from Gerry Sweeney and others 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 material issues

Section 131 not to be invoked at this stage.

☒

Section 131 to be invoked — allow 2/4 weeks for reply.

☐

Signed

Pat B

Date

07/04/2024

EO

Signed

Date

SEO/SAO

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

Task No

Allow 2/3/4 weeks

BP

Signed

Date

EO

Signed

Date

AA



Planning Appeal Online Observation

Online Reference
NPA-OBS-003313

Online Observation Details

Contact Name
gerry sweeney

Lodgement Date
31/03/2024 19:42:50

Case Number / Description
314485

Payment Details

Payment Method
Online Payment

Cardholder Name
Gerry Sweeney

Payment Amount
€50.00

Processing Section

S.131 Consideration Required

☒ Yes — See attached 131 Form

☐ N/A — Invalid

Signed

Pat B

EO

Date

07/04/2024

Fee Refund Requisition

Please Arrange a Refund of Fee of

€ 50

Lodgement No

LDG— 071131-24

Reason for Refund

Response - no fee required

Documents Returned to Observer

☐ Yes ☒ No

Request Emailed to Senior Executive Officer for Approval

☒ Yes ☐ No

Signed

Pat B

EO

Date

07/04/2024

Finance Section

Payment Reference

ch_3P0TLCB1CW0EN5FC1tOk7Eo3

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

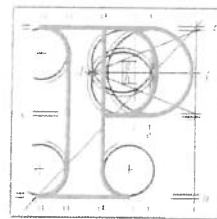
Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date

Our Case Number: ABP-314485-22

Planning Authority Reference Number: F20A/0668



An
Bord
Pleanála

Gerry Sweeney and others
Forest House
Forest Road
Swords
Co. Dublin
K67 WH41

Date: 17 April 2024

Re: A proposed development comprising the taking of a 'relevant action' only within the meaning of Section 34C of the Planning and Development Act 2000, as amended, which relates to the night-time use of the runway system at Dublin Airport.
Dublin Airport, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above-mentioned appeal.

Please note that you are not required to pay a fee when making a submission where you have been invited to make comments by An Bord Pleanála.

A refund for the amount paid will be made to the debit/credit card used to make the transaction.

Yours faithfully,

Patrick Buckley
Executive Officer
Direct Line: (01) 8737167

BP23

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Facs
Láithreán Gréasáin
Ríomhphost

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Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

ABP Case Number : ABP-314485-22

Planning Authority Reference Number : F20A /0668

My Name : Gerry Sweeney

My Address : Forest House
Forest Road ,
Swords
Co Dublin

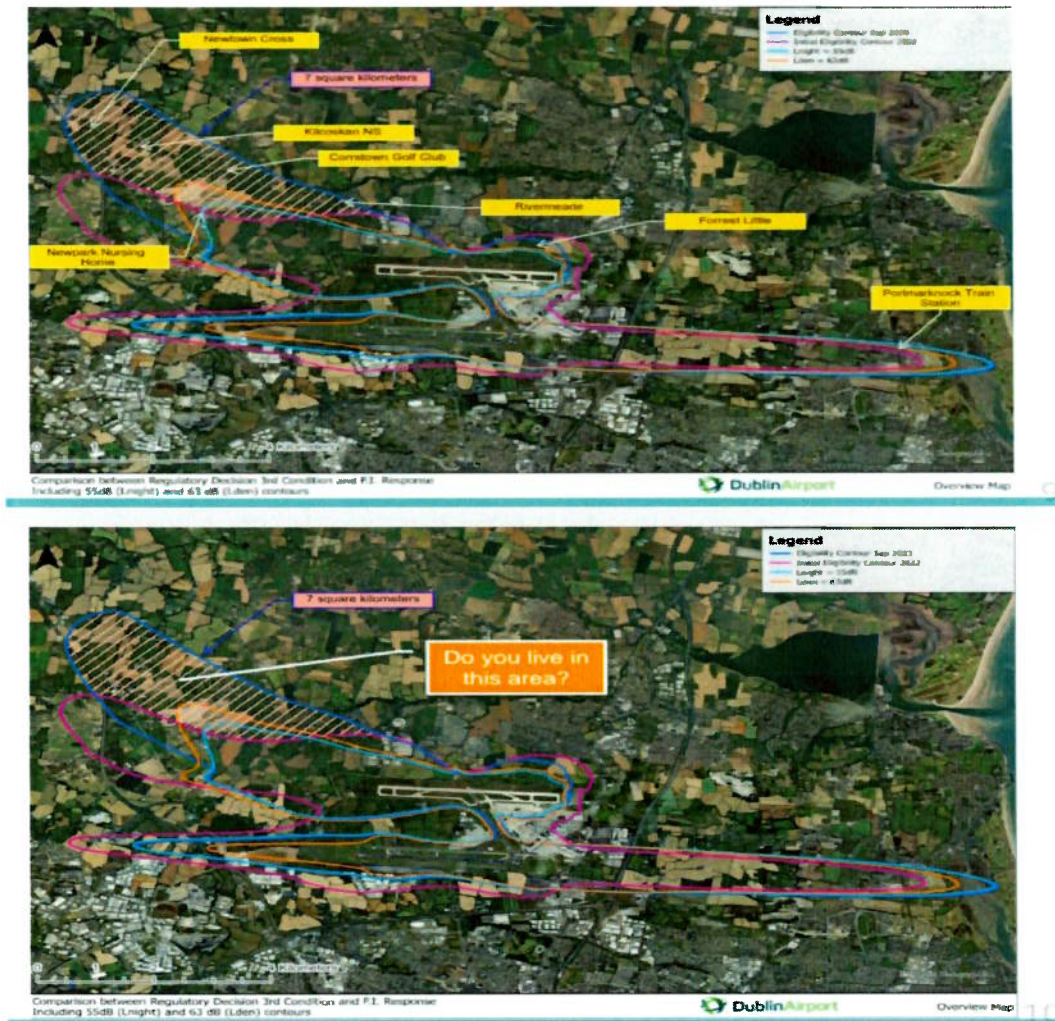
K67WH41

Email : gerry.macsween.2018@gmail.com

Hello Mr Buckley ,

I note your recent letter and appreciate the opportunity of being able to review the latest submission from the daa. I would like to make a small number of hopefully helpful observations from a South Swords perspective.

Observation 1



You will observe from the new "revised" contour maps set out above recently submitted by the daa that the insulation eligibility contour for the South Swords region has retreated *closer* to the Northern Runway. South Swords is a significant urban region bordering Dublin Airport with an estimated population of 12000. I could not find specific reference in the accompanying text to the rationale for this material change. I am also not aware of any "on the ground" comprehensive noise data collection being carried out in this region in 2023? It then occurred to me that a new well designed earth berm must be planned adjacent to the eastern portion of the northern runway and the impact of this welcome addition must have been factored into the revised noise/insulation projections.

I would request that you ask the daa to confirm this positive development to be indeed the case, as I could not find explicit reference to it in the text.

Observation 2

Plate 1: Runway Usage in Westerly Operations



When the wind is coming from the east (approximately 30 percent of the time), aircraft will arrive from the west and take off into the east. Daytime arrivals will use both runways and the vast majority of daytime departures will use the South Runway in easterly operations as shown in Plate 2 below.

Plate 2: Runway Usage in Easterly Operations



There would be very limited use of the cross runway, and under the Permitted Scenario, North Runway would not be used between 11pm and 6am. Further from the airport, the proximity of locations to the departure routes would also influence the noise levels.

This observation has particular significance because of the proposed extended duration of "daytime" operations.

You will, of course, recognize the extract taken above from the original EIAR, prepared by Bickerdike Allen Partners, submitted with the original application to Fingal County Council. I believe the detail in this EIAR is extremely important as this *IS* the basis on which FCC Planning & ANCA assessed the application from a "balanced approach" perspective and ultimately gave their approval. You will note from the associated text that the formulations and recommendations were based on an in-depth historic analysis positing **winds blowing from the "East" approximately 30% of the time and, by corollary, blowing from the "West" approximately 70% of the time**. The significance of this key detail is that it implied that "balanced approach equity" *mandated* aircraft taking off during "daytime operations" 70% of the time on the Northern Runway (high noise & air pollution experience for South Swords) and hence by logical implication 30% of the time on the Southern Runway (modest noise & air pollution experience for South Swords).

You will then understand my surprise when I read in the latest submission, prepared by Tom Phillips & Associates, ...

"The fact that 80% of the time, the wind blows from the West means that the contours to the West of the South Runway are shorter than those to the East."

and again

"On 80% of daytime hours, the wind blows from the West and departures head westward from the Northern Runway (due to condition 3b)."

What I believe to be a very valuable asset, sadly almost completely unused by the planning applicant noise specialists to date, is the very valuable daily *"on the ground noise experience"* of the human noise monitors who live near Dublin Airport.

Based on my actual recent daily experience, living close to the Northern runway, ... I believe that ..

- The Bickerdike Allen Partners (West/East) 70% / 30% wind direction projections ARE materially correct but that nonetheless
- during daytime operations in the second half of 2023 aircraft DID take off 80% (or more) of the time on the Northern Runway.

How can these apparently contradictory statements be reconciled?

There are some plausible explanations ?

- AirNav does not monitor, nor does it believe it to be its responsibility to monitor compliance with the (West / East) 70% / 30% "rule" for "balanced" airport noise management?
- AirNav will always operate to the "simplest" operational plan consistent with its own rules & aircraft safety?
- Under AirNav current operating guidelines aircraft MAY take off "with" rather than "into" the wind provided the wind speed does not exceed 8 knots?
- When wind direction approaches due North or due South, AirNav current rules allow it to be agnostic in its selection of the Northern over the Southern runway for daytime take-off operations?

The combination of these factors with "selective dominant bias" MAY be currently the reason why statistics show some 80%+ (some recent stats suggest 85%) of daytime operations take-offs being from the Northern Runway?

The current predominant use of the Northern Runway for daytime take-offs represents an unacceptable level of deviation from the original mandated (West / East) 70% / 30% "rule" which has been the basis of planning approval for dual runway use since 2007. By way of example an 80% Northern Runway take-off proportion represents a **33% reduction** in the more acceptable "moderate" noise pollution levels in South Swords: while an 85% proportion pushes this to a devastating **50% reduction** !

I would request that, as part of any planning adjudication, ABP mandates that a robust dual runway daytime usage monitoring system is put in place whereby adherence to the "balanced approach" 70% / 30% rule for daytime dual runway operations can be ensured without compromising aircraft safety.

Observation 3

My understanding is that the proposed new residential dwelling insulation scheme does *not* have an **explicit noise mitigation threshold target** for those dwellings (quoting from the Tom Phillips Report) "exposed to noise above the priority value" and "exposed to potentially harmful levels of aircraft noise". The partial assistance currently proposed is also capped at a monetary limit. I spoke recently to an aircraft noise acoustics expert attached to one of our universities and he explained that there are very significant challenges to incorporating workable roof insulation measures effective against nighttime aircraft noise. A research facility associated with this institution will be researching this very topic in the near future.

I would request that ABP, in adjudicating on this application, ensures that appropriate & independent peer reviewed maximum domestic dwelling noise standards are explicitly set for any residential noise insulation scheme (particularly in relation to night time aircraft noise), that these standards do not operate subject to a monetary cap and that they are rolled out, tested and deemed fit for purpose in advance of any implemented increase in airport night noise.

Thanking you for your assistance.

ABP Case Number : ABP-314485-22

Planning Authority Reference Number : F20A /0668

My Name : Gerry Sweeney

My Address : Forest House
Forest Road ,
Swords
Co Dublin

K67WH41

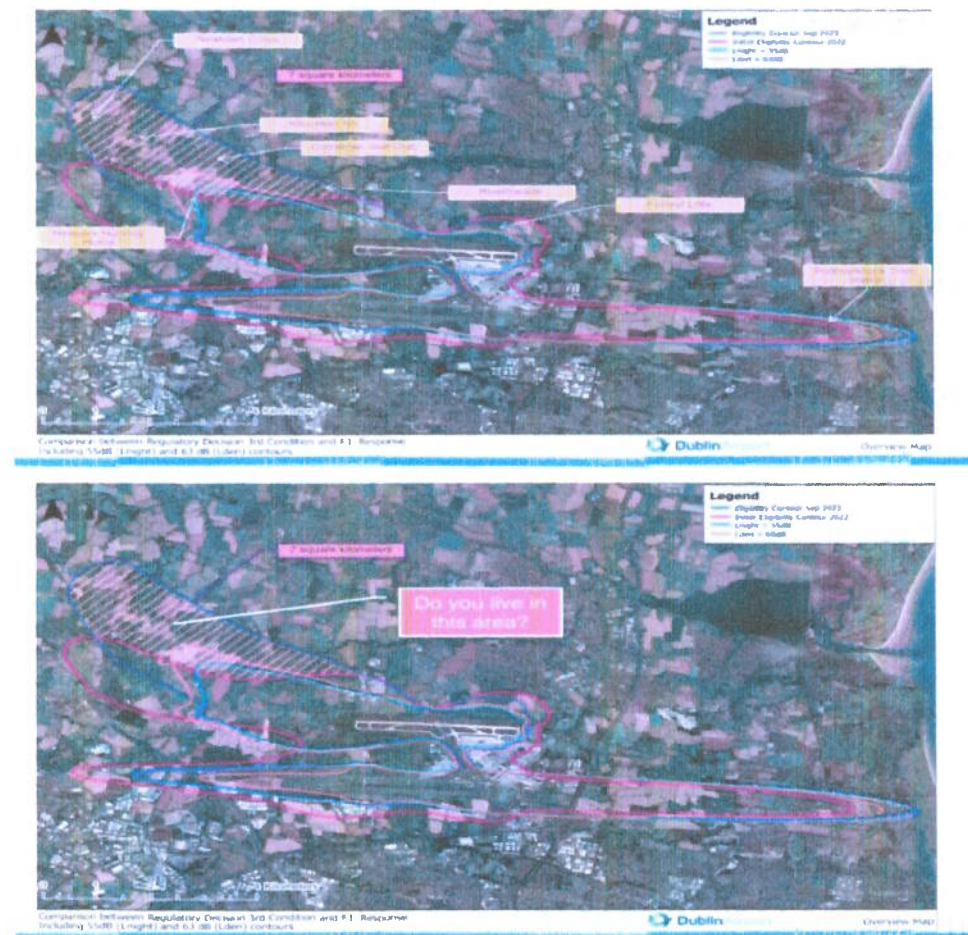
Email : gerry.macsween.2018@gmail.com

AN BORD PLEANÁLA	
LDG- _____	
ABP- _____	
02 APR 2024	
Fee: € _____	Type: _____
Time: 12.10. _____	By: <u>Hand</u>

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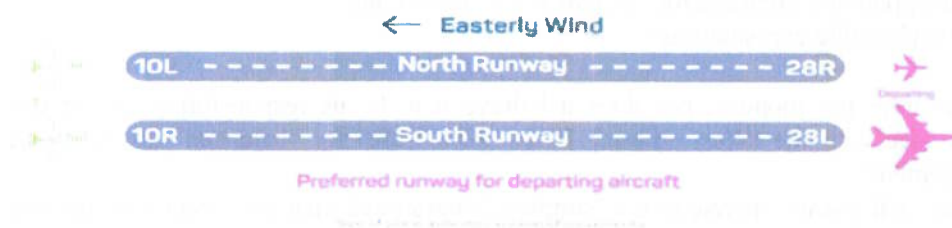
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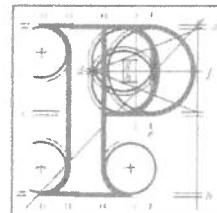
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Thanking you for your assistance.

P. Sweeney

Our Case Number: ABP-314485-22

Planning Authority Reference Number: F20A/0668



**An
Bord
Pleanála**

Gerry Sweeney and others
Forest House
Forest Road
Swords
Co. Dublin
K67 WH41

Date: 12 March 2024

Re: A proposed development comprising the taking of a 'relevant action' only within the meaning of Section 34C of the Planning and Development Act 2000, as amended, which relates to the night-time use of the runway system at Dublin Airport.
Dublin Airport, Co. Dublin

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer to the above mentioned appeal.

The Board is of the opinion that, in the particular circumstances of this appeal, it is appropriate in the interests of justice to request you to make submissions or observations in relation to the submission dated 4th March 2024 received from Tom Phillips and Associates on behalf of DAA plc.

The submission has been posted on the website of An Bord Pleanála at <https://www.pleanala.ie/en-ie/case/314485>.

In accordance with section 131 of the Planning and Development Act, 2000, (as amended), you are requested to make any submissions or observations that you may have in relation to this submission **on or before 2nd April 2024**. The Board cannot consider comments that are outside the scope of the matter in question. Your submission in response to this notice must be received by the Board not later than **5:30pm on the date specified above**.

If no submission or observation is received before the end of the specified period, the Board may proceed to determine the appeal without further notice to you, in accordance with section 133 of the 2000 Act.

Please quote the above appeal reference number in any further correspondence.

Yours faithfully,

Patrick Buckley
Executive Officer
Direct Line: 018737167

BP70 Registered Post

Tel	Tel	(01) 858 8100
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Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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