

File With _____

SECTION 131 FORM

Appeal NO: ABP 314485-22Defer Re O/H ☐Having considered the contents of the submission dated/ received 02/04/2024
fromThomas Fee 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 issuesE.O.: Pate BDate: 18/04/2024

For further consideration by SEO/SAO

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: _____ Task No: _____

Allow 2/3/4weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ABP 314485-22

M _____

Please treat correspondence received on 02/04/2024 as follows:

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

Amendments/Comments Thomas Fee response to S.13112/03/24: 02/04/24

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 <input type="checkbox"/>
Date Stamped Filled in <input type="checkbox"/>

EO: Pat BAA: Anthony McNallyDate: 18/04/2024Date: 25/04/2024

Stephen Sutton

From: Bord
Sent: Tuesday 2 April 2024 14:13
To: Appeals2
Subject: FW: Letter in relation to invitation to comment on further information re PL06F.314485 Ref NPA-OBS-002974
Attachments: ABP 314485_22 Letter Tom Fee 3 of 3.png; ABP 314485_22 Letter Tom Fee 2 of 3.png; ABP 314485_22 Letter Tom Fee 1 of 3.png

From: Tom Fee <tomasofiaich@yahoo.co.uk>
Sent: Tuesday, April 2, 2024 2:09 PM
To: Bord <bord@pleanala.ie>
Cc: Tom Fee <tomasofiaich@yahoo.co.uk>
Subject: Letter in relation to invitation to comment on further information re PL06F.314485 Ref NPA-OBS-002974

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.

Please find attached three pages of a signed letter from me commenting on the additional information provided to ABP in relation to the relevant action PL06F.314485.

Regards

Tom Fee
47 Carrickhill Heights
Portmarnock
Co. Dublin
D13X261

Mob: 087 6878157
Email: tomasofiaich@yahoo.co.uk

An Bord Pleanála

64 Marlborough St.

Dublin 1

D01 V902

RE: Case Number ABP- 314485-22 Relevant Action Application Dublin Airport

Planning Reference No. F20A/0668

Dear Sir/Madam

Thank you for the opportunity to comment on the additional information received by ABF in relation to the relevant action (above).

My comments can be summarised into four very significant concerns:

1. The additional information provided by the DAA to ABP shows that their envisaged distribution of aircraft noise is different again to that indicated in their initial submissions for the relevant action. Their latest view of affected areas and the degree to which they are affected are very different also to those indicated and evaluated in attaining the current planning approvals. They are different to those presented in consultations with affected communities. Some residents are now indicated (through the additional information) as significantly affected by aircraft noise but were not here-to-fore. These residents and their planning authorities have had no way of anticipating the impact on their dwellings and lives when they were making decisions and many will have never been afforded an opportunity to review or comment on these changes and/or may still be blissfully ignorant that these changes are proposed. The DAA have created a moving target of who may be affected and to what extent and have undermined the ability of affected communities to engage with the decisions affecting them.
2. The new information on areas significantly affected by noise is not based on a structured scientific measurement of the actual noise levels experienced in the communities surrounding the airport. While some degree of simulation is necessary in order to extrapolate expectations into a changing future, simulating the current situation without adequate validation, covering all potentially affected areas, renders the results provided as unreliable.
3. Additionally the use of a diluted version of the Lnight measure - Lnight365 - and the application of thresholds above the ANCA acknowledged WHO guideline safe limit (40 Lnight) undermines the validity of what is being presented as an exercise to provide some protection to the most adversely affected properties.
4. The new information introduces further inconsistencies and contradictions within the body of information provided by the DAA in relation to how aircraft noise will develop around Dublin Airport, in the event of the relevant action being approved, and the resultant impacts on the health and safety of thousands of residents in affected communities. These inconsistencies and contradictions, together with significant gaps in necessary information, compound to render it impossible to accurately or adequately assess the extent of adverse impacts arising from the relevant action.

Some of the inconsistencies, contradictions and gaps that are of most concern in relation to the relevant action are:

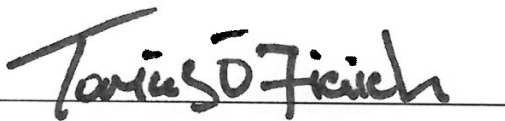
- a) The noise sleep disturbance levels and the recommendations for insulation are based on WHO guidelines which clearly state they are using Lden and Lnight measures per the ISO 1996-1 standard. The DAA and ANCA measure of Lden and Lnight is Lden365 and Lnight365 which dilute noise levels by averaging it over all days/nights even when no flights are scheduled to follow that route or use that runway. The use by Ireland of these metrics calculated in this way across multiple runways and routes and to then compare these measurements to thresholds based on a different measure is clearly inconsistent, misleading and at odds with ECAC guidelines. It also appears to be unique to Ireland.
- b) The use of different calculations of Lden and Lnight in documents submitted by DAA and ANCA referencing standards which use a different measure of Lden and Lnight is misleading for the public and confounds their efforts to understand and engage in the planning process as it relates to noise. Thousands of people are attending meetings and expressing concern that DAA and ANCA contours are telling them that they are not affected by aircraft noise at all and yet they are regularly been awoken by aircraft noise. This obscuring of the relationship between actual noise experienced and the contours upon which decisions are being made is undermining the ability of individuals and communities to make a case to protect themselves against decisions that will bring increased harmful levels of noise.
- c) The DAA and ANCA information is based on simulations of the current noise levels and then extrapolations from that into a changing future. However there is a significant body of evidence available (from structured independent assessments paid for by individuals and associations and from the data generated from monitoring stations and the webtrak system) showing that the DAA simulations of current state noise distribution are inaccurate. It is extraordinary that despite the availability of actual data sources, the DAA and ANCA refuse to use them fully (and in most cases, at all)
- d) The council (FCC) planning office, using the same information on noise provided by the DAA requires that if I were to extend my house in Portmarnock, I will need to put in noise insulation (as I am in Zone B > 55Lnight according to their map) yet my house is outside of the proposed area noted in the additional information as requiring insulation. My lived experience is that there are, already, often nights when I am awoken by aircraft overflying my home and this is before the significant expansion of night flights that would be allowed by the relevant action if approved.
- e) The additional information is based on a single scenario (7b) which includes an expectation of numbers and types of planes and usage of runways however the relevant action requests changes that would allow for a much greater number of aircraft movements than is simulated and a range of very different distributions of noise concentrations that would result in different contours even based on the flawed measures employed and that could create far greater levels of sleep disturbance than indicated. This additional information is therefore not adequately aligned with the implications of the request.
- f) The proposal does NOT meet the Noise Abatement Objective of ANCA in future years. The proposed 2025 Scenario will fail the NAO when compared to 2019 when the total of the existing population, permitted developments and zoned developments are summed together. "2025 exceeds 2019 by 4,541 people (1533 v 6074).

- g) No attempt has been made to support the information (or the original information) with standard measures of completeness and accuracy and variability to assure correct interpretation and inform the weighting that can be associated with different measures.
- h) While the additional information appears to be focused on supporting protection of health, there is actually no assessment of the health implications of the relevant action and the degree (if any) to which the proposed insulation will improve health outcomes. There continues to be an absence of any informed focus on the adverse health implications of the relevant action.
- i) The noise insulation grant as proposed is not fit for purpose and is totally insufficient to protect for night noise. Measurements of noise in bedrooms of housing already insulated indicate that the noise levels exceed the recommendation in Fingal Development Plan and are not sufficient to protect human health.
- j) Re-distribution of aircraft noise through the use of the two runways and the orientation of take-offs and the variation of flight paths is acknowledged by ANCA as one of the primary strategies employed to achieve their NAO targets. The NAO targets are stated to align with WHO guidance. However WHO 2018 guidance (the latest) specifically states that "noise exposure reduction in one area should not come at the expense of an increase in noise elsewhere". The result of re-distribution is that more people are exposed to harmful levels of aircraft noise but most will not get harmful levels seven days per week. They may get it for half of the week. The inappropriate use of averages then takes many affected people out of the count such that it can appear that the numbers of people exposed to harmful levels of noise are going down when they are actually going up. This is contradictory to the stated aims of the NAO and the alignment stated to WHO standards.

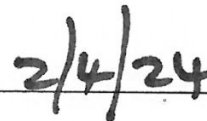
The additional information provided further builds the case for urgently rejecting the relevant action.

Yours Sincerely,

Sign:


THOMAS FEE

Date:



Address: 47 Carrickhill Heights, Portmarnock, D13X261