

File With

SECTION 131 FORM

Appeal No

ABP— 314485-22

Defer Re O/H

☐

Having considered the contents of the submission dated/received 14/12/2023
from James Humphreys 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

EO

Date

21/12/2023

Signed

SEO/SAO

Date

M

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

To

Task No

Allow 2/3/4 weeks

BP

Signed

EO

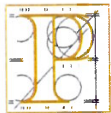
Date

Signed

AA

Date

LDG - C68924-23



An
Bord
Pleanála

Planning Appeal Online Observation

Online Reference
NPA-OBS-003016

Online Observation Details

Contact Name
James Humphreys

Lodgement Date
14/12/2023 17:03:39

Case Number / Description
314485

Payment Details

Payment Method
Online Payment

Cardholder Name
James Humphreys

Payment Amount
€50.00

Processing Section

S.131 Consideration Required

☒ Yes — See attached 131 Form

☐ N/A — Invalid

Signed

Pat B

EO

Date

21/12/2023

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

☐ Yes ☐ No

Request Emailed to Senior Executive Officer for Approval

☐ Yes ☐ No

Signed

EO

Date

Finance Section

Payment Reference

ch_3ONIJzB1CW0EN5FC0C2JEaC3

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

Subject: Concerns and Opposition to Proposed Changes in Dublin Airport Nighttime Flying Restrictions (Case Ref: PL06F.314084)

Dear Inspectors,

I am writing to express serious concerns and opposition to the proposed changes in nighttime flying restrictions at Dublin Airport under Case Ref: PL06F.314084. The recent decision by a significant majority of Fingal councillors to maintain the nighttime restrictions, along with the original stance of An Bord Pleanála (ABP) in 2007, reflects the will of the local democracy and underscores the importance of a balanced approach to the development of the Irish aviation industry.

Several key factors contribute to the argument against the proposed changes:

Daytime Airport Capacity Increase: The addition of a second parallel runway is estimated to provide a 60% increase in daytime airport capacity. This expansion, however, must be considered in the context of other critical factors.

Transport Links Deficiencies: Ongoing deficiencies in transport links to Dublin Airport need to be addressed before any significant changes to operational conditions are considered.

Imbalance in Airport Development: There exists a major and growing imbalance in the development of Dublin, Cork, and Shannon airports. A holistic approach is needed to ensure equitable growth and distribution of air traffic.

Urbanization in Fingal & Greater Dublin Regions: The recent surge in urbanization in regions bordering Dublin Airport necessitates careful consideration of the environmental and social impacts of increased nighttime flights.

Climate Change Concerns: The imminent threat of climate change, coupled with Dublin Airport being a significant CO2 emitter, reinforces the need for a sustainable and environmentally conscious approach to aviation development.

Furthermore, the deficiencies in the supporting evidence provided by Dublin Airport Authority (DAA) are significant:

Unvalidated Noise Prediction Models: The aviation noise prediction models lack independent validation or peer review, rendering them unsound and unsafe.

Inadequate Noise Metrics: Relying on crude time averaging metrics falls short of current best practice, making the models unsound and unsafe.

Obsolete and Insufficient Historic Data: The reliance on outdated and insufficient historic data for aircraft ground noise predictions is a serious flaw in the proposed changes.

Discrepancies in Environmental Report: The core assumptions for twin parallel runways differ materially from emerging actual usage data, leading to unsound predictions.

Air Pollution Impact Predictions: Predictions on air pollution impacts using outdated and insufficient data are unvalidated and unsafe.

Considering the Night Noise Guidelines for Europe and Regulation (EU) No 598/2014, which emphasize the importance of health aspects in noise abatement decisions, it is evident that the expansion of flight operating time would not align with a balanced approach. Residents exposed to higher noise levels may suffer from health effects, including sleep disturbance and insomnia, violating their basic right to a good night's sleep.

In conclusion, I urge the inspectors to thoroughly consider the aforementioned points. The WHO guidelines for night noise recommend an annual average (L_{night}) of less than 40 dB(A) outside of bedrooms to prevent adverse health effects from night noise and the broader implications of the proposed changes. The potential negative impacts on the environment, public health, and the well-being of local residents must be weighed carefully against any perceived benefits.

Thank you for your attention to this matter.

Sincerely,

James Humphreys

8 Castlevue way

Swords

Co, Dublin