

File With \_\_\_\_\_

## SECTION 131 FORM

Appeal NO: ABP 314485-22Defer Re O/H ☐Having considered the contents of the submission dated/ received 12/12/2023

from

Peter WilsonI 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.: Pat BDate: 15/12/2023

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: \_\_\_\_\_



## SID Online Observation

Online Reference  
SID-OBS-001424

### Online Observation Details

Contact Name  
Peter Wilson

Lodgement Date  
12/12/2023 18:54:50

Case Number / Description  
314485

### Payment Details

Payment Method  
Online Payment

Cardholder Name  
Peter Wilson

Payment Amount  
€50.00

### Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG— 068913 -23

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\_3OMb6UB1CW0EN5FC1oIRYvkz

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

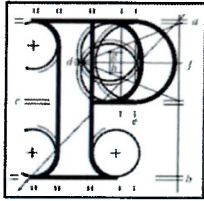
SEO (Finance)

Authorised By (2)

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

Date

Date



An  
Bord  
Pleanála

## Observation on a Strategic Infrastructure Development Application

### Observer's details

#### 1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Peter Wilson

(b) Observer's postal address

Aine, Mabestown, The Ward. D11P206.

### Agent's details

#### 2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal address

Click or tap here to enter text.

## Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application** who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

☒

The agent at the postal address in Part 2

☐

## Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation .

- (a) **An Bord Pleanála case number for the current application (if available)**  
(for example: 300000)

An Bord Pleanála Appeal Case Number: PL O6F.314485

**Planning Authority Case Reference: F20A/0668**

- (b) **Name or description of proposed development**

Relevant Action – retention of usage violating existing planning permission

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Dublin Airport



## Observation details

### 5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

#### **Flight path changes**

Throughout the planning process for the North runway, the noise maps shown were parallel to the south runway with a secondary path for the cross runway 16\_34.

At no point did the noise paths show the northward deviation on westbound flights on 28R. Kenny Jacobs asserted on Primetime October 2023 that the current flights were always the intended flight paths.

DAA have now issued updated noise maps stating that they have done this because the flight paths have changed from those in the original planning permission.

It is very hard for the local residents to have any trust in DAA when the CEO is prepared to lie on national TV.

There has been no communication from DAA to us about sound insulation and it is only with the publication of the relevant action that they have now provided more accurate noise maps.

It may well be true that DAA paid to insulate houses that were to have been affected by the north runway but most likely these were based on straight flight paths.

#### **RFI noise modelling report**

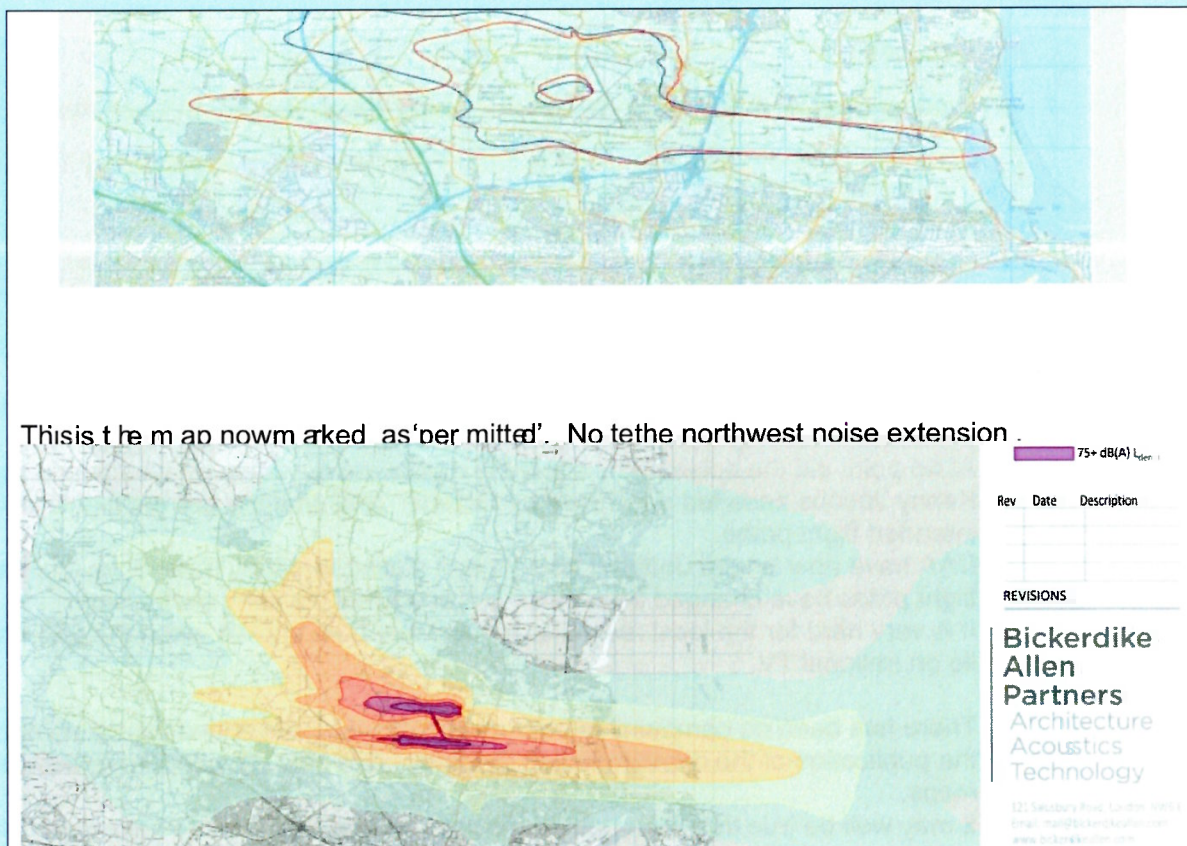
The maps for permitted v proposed are misleading in that the permitted show the northwest deviation which is the biggest problem with the north runway.

To call this 'permitted' is to push the false narrative that this is consistent with the current planning permission. It isn't.

This is an example of what was published in consultations. Similar maps can also be found in the Bickerdikey docs of that time.

[https://www.dublinairport.com/docs/default-source/resources/view-red-c-research-report.pdf?sfvrsn=2ab85915\\_2](https://www.dublinairport.com/docs/default-source/resources/view-red-c-research-report.pdf?sfvrsn=2ab85915_2)

## 5. Grounds



I live close to Coolquay and did not object to the North runway on the basis that the flight path would only be about 1.7 km closer.

The aircraft taking off on 28R (south runway) are audible in the house but are not a major nuisance. Sometimes I hear them from 6am to 7am.

At 7am they switch to 28L and come much closer. Some go right over the house, and they are rarely higher than 3500 ft (per flightradar24). Sometimes they are lower. Sleep is impossible.

As Dr Penzel's report (part of the ABP docs) affirms, early morning noise is much more destructive of sleep than late evening noise because the sleep is in a lighter part of the cycle.

6 – 7am is one of the busiest times for Dublin airport so I'm sure they'd love to use both runways for take-off. This would make life intolerable for me and my family.

Table 13B-8 confirms this.

Table 13B6 shows current usage of 16 flights on 28L and 0 on 28R between 6am and 7am.

Table 13B-8 shows proposed usage of 3 flights on 28L and 27 on 28R. The overall number of flights is almost doubled and most of them are now on the north runway.

The noise quota that DAA mentions in the covering letter does not appear elsewhere in the ABP documentation. From what Kenny Jacobs said, this seems to be a cynical attempt to push the noise responsibility away from DAA to the aircraft operators.

DAA has to remain responsible to Fingal and to Ireland for the noise from users of Dublin airport. It would be extremely difficult for residents to take legal action against Zimex, Hifly, Ethiopian or any foreign carrier.

**Ni ghtfli ghts**



## 5. Grounds

These are not a big issue for me at present because they all use the South runway. I rarely hear them. If they are permitted to use the North runway, then that would make the house unliveable and unsaleable.

Mott McDonald's report suggests that the primary growth in night flights is cargo. These tend to be older noisier aircraft.

Fedex wants to build a major logistics hub near Dublin Airport.

<https://www.independent.ie/business/irish/fedex-announces-plans-for-major-logistics-hub-next-to-dublin-airport/a1272871346.html>

Fedex has European hubs at Paris CDG, Liege and Cologne (amongst others). These are examples of busy cargo airports and their activity can be seen on flightradar24.

Cologne typically has at least 70 cargo departures each night, including several 747 jumbo jets. Paris is similar. If Fingal and ABP allow increased night flights, then we can expect a huge increase in night time noise from these cargo flights.

Cargo used to be primarily in Shannon. Why is Dublin competing to take this business away from Shannon?

The flights that currently happen between 11pm and 7am already include a few cargo flights, but DAA seems to want to greatly increase this.

There are also regular flights by minority airlines such as Flyone and HiSky. These use older noisier aircraft.

DAA also attracts refueling flights between 11pm and 7am (Ethiopian to US and Canada). No passengers get on or off. There is minimal economic benefit to Ireland in facilitating the refueling flights.

The price of Jet A is fairly uniform across Europe. Dublin doesn't need this business.

### **Night flight noise maps**

The Night maps show huge change.

The Night 2025 permitted has all significant noise on a straight flight path from the south runway. DAA seem to be abiding by this in general.

Proposed Night shows a huge change moving our house from 40-44 dB to 55-59. This is very bad for us. This is because DAA wants to use the North runway for all 24 hrs. As already stated, most of the increase is to be cargo.

The modelled departure routes on 28L (South) in 13B.3.38 are all substantially short of the 5 nautical miles straight path before turning, which used to be the standard. Many of these will cause an unacceptable level of noise.

It is apparent that in the last few months DAA has started using some of these shorter routes in the early morning on 28L departures and there is now increased noise between 6am and 7am.

This seems to be a ploy by DAA to drive out the residents of this area and further proof of bad faith on the part of DAA.

The modelled altitude per phase in 13B.3.54 is for 28L. This needs to be done for 28R and published. 28L is best case because it's a straight departure. The severe turn to the right on the 28R flight paths means that the aircraft doesn't climb as quickly, so it is lower and noisier.

All the aircraft noise maps in Figures 13C are for 28L. 28R is where the problem is. Again, DAA is not prepared to publish the facts honestly.

## 5. Grounds

### **Fleets**

Fleet modernization is entirely speculative and is outside of the control of DAA. There's no basis to allow planning permission based on speculation.

As Mott McDonald notes, the decision to upgrade Ryanair's 737-800 fleet is a matter for Ryanair. We all know the regard Ryanair has for DAA.

The night flights are cargo and minority airlines and will not be using modern aircraft. It is possible that Ryanair may modernize and thus improve daytime noise but there's no realistic prospect of this happening for the nighttime carriers.

ABP should disregard this fleet modernization argument. If and when the bulk of aircraft do get upgraded to next generation then DAA could re-apply.



## Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

## Fee

7. You **must** make sure that the correct fee is included with your observation.

**Observers (except prescribed bodies)**

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

## Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#) please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

☐

No, I do not wish to request an oral hearing

☐

## Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

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**For Office Use Only**

| <b>FEM – Received</b> |  | <b>SIDS – Processed</b> |  |
|-----------------------|--|-------------------------|--|
| Initials              |  | Initials                |  |
| Date                  |  | Date                    |  |

**Notes**