

File With _____

SECTION 131 FORM

Appeal NO: ABP 314485-22Defer Re O/H ☐Having considered the contents of the submission (dated) received 13/12/2023
fromGerty 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 issuesE.O.: Pat B.Date: 18/12/2023

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 2/3/4 weeks – BP _____

EO: _____

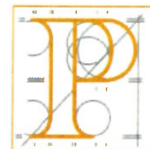
Date: _____

AA: _____

Date: _____

Validation Checklist

Lodgement Number : **LDG-068744-23**
Case Number: **ABP-314485-22**
Customer: **Gerry Sweeney and others**
Lodgement Date: **13/12/2023 10:37:00**
Validation Officer: **Patrick Buckley**
PA Name: **Fingal County Council**
PA Reg Ref: **F20A/0668**
Case Type: **Normal Planning Appeal PDA2000**
Lodgement Type: **Observation / Submission**



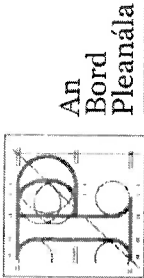
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Bord
Pleanála

Validation Checklist	Value
Confirm Classification	Confirmed - Correct
Confirm ABP Case Link	Confirmed-Correct
Fee/Payment	Valid – Correct
Name and Address available	Yes
Agent Name and Address available (if engaged)	Not Applicable
Subject Matter available	Yes
Grounds	Yes
Sufficient Fee Received	Yes
Received On time	Yes
Eligible to make lodgement	Yes
Completeness Check of Documentation	Yes

Run at: 18/12/2023 11:36

Run by: Patrick Buckley

Lodgement Cover Sheet - LDG-068744-23



Details

Lodgement Date	13/12/2023
Customer	Gerry Sweeney obo Forest Great Resident's Group
Lodgement Channel	In Person
Lodgement by Agent	No
Agent Name	
Correspondence Primarily Sent to	
Registered Post Reference	

Lodgement ID	LDG-068744-23
Map ID	
Created By	Aisling Litster
Physical Items included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	

Categorisation

Lodgement Type	Observation / Submission
Section	Processing

PA Name	Fingal County Council
Case Type (3rd Level Category)	

Fee and Payments

Specified Body	No
Oral Hearing	No
Fee Calculation Method	System
Currency	Euro
Fee Value	0.00
Refund Amount	0.00

Observation/Objection Allowed?	
Payment	PMT-053398-23
Related Payment Details Record	PD-053271-23

AB-314485-22

Observation

Case Number	
Decision Date	
County	
Development Type	
Development Address	
Appellant	
Supporting Argument	

Development Description	
Applicant	
Additional Supporting Items	

AN BORD PLEANALA	
LDG-	068744-23
ABP-	
13 DEC 2023	
Fee: €	50
Type:	Chg
By:	15152 HAWD

For the attention of inspectors assessing **Bord Pleanála**
 Your Case Ref : ABP-314485-22 Planning Authority Ref F20A/0668

The residents of South Swords understand, based on expert feedback supplied to the original planning application (Mr King's Report now in the public domain), that this noise pollution *will get materially worse* if the changes proposed under F20A/668 are implemented. South Swords has been less knowledgeable and hence less adept up to now in championing their pollution mitigation rights arising from the new Northern Runway operations. Hopefully this now should, in equity, give greater weight to their current legitimate requests:

- Everyone in South Swords understands that Dublin Airport is essential national infrastructure.
- Everyone in South Swords understands that an increased level of noise pollution is inevitable with the opening of the Northern Runway.
- However, everyone in South Swords also believes that all realistic and practical steps should be taken to mitigate this ever increasing noise pollution which significantly impacts an estimated 12,000 South Swords population.

Full operations on the Northern Runway *have only been in place for the last few months*, so the full extent of noise and air pollution of *even the current planning conditions* could only be experienced by South Swords residents very recently. This pollution will materially increase if F20A/668 is implemented in its current form.

The residents of South Swords now earnestly and urgently request An Bord Pleanála consider two realistic noise & air pollution mitigation actions as part of the adjudication of this planning appeal.

These are as follows ;

An Earth Berm (mound) for the eastern portion of the northern runway

An unusual feature of the North Runway pollution impact on South Swords is that it is almost exclusively from aircraft taking off , *but while still on the ground*. There are singular design, geographic and climatic features that exacerbate this effect. The runway is slightly elevated with no natural barriers to the north. Aircraft predominantly start their take-off acceleration on the Northern Runway at full thrust *to the east* ; then approach closer to South Swords ; and then, while still moving slowly, progress to the west before lifting off. Hence the duration of the extreme *noise signature is much longer* than would be the case for aircraft moving at full travel speed. As 100% of day operations take-offs for westerly operations are currently mandated to operate on the Northern Runway conservative projections posit that *70% of all daytime operation take-offs* will take place on the Northern Runway. However, recent Daa statistics show that the actual figure is 80%. Further, under dual runway operations take-offs can take place every 2 minutes without pause and, as winds typically blow continuously from a broad westerly direction for weeks on end, the extreme noise is all but continuous from 7am to 11pm (and moving, under F20A/668, to from 6am to 12pm).

Our own independent research concludes that a well designed earth berm extending 1 km from the eastern end of the Northern Runway will *materially reduce both the noise and air pollution* with no adverse effect on other airport neighbourhood residents. The continuous building development at the airport results in suitable excavated material being available directly on the campus at regular intervals. Ironically there was a temporary earth mound on the northern runway during its construction phase (which residents thought would become a permanent feature). Our understanding from conversations with the Daa is that an **earth mound can only be put in place IF it is part of future planning conditions.**

Please include the requirement of an earth mound on the Northern Runway in your adjudication on F20A/668.

Optimum "resident friendly " Implementation of the projected 70% day time operations take-off rule for the Northern Runway

South Swords residents are being asked to bear the lion's share of the noise pollution burden from the current planning conditions attaching to the Northern Runway. This is because close proximity to take-off gives rise to the most extreme noise and air pollution, the fact that a initially projected 70% (actual 80%) of day time take-offs will operate from the northern runway, the fact that these will operate for 100% of the time for weeks on end and the fact that the unique features of the Northern Runway outlined above significantly amplify these effects further. F20A/668, if implemented in its current form, will add a significant further burden on top of this injustice. Our understanding from conversations with the Daa is that ANY modified implementation of the 70% Northern Runway day time take-off rule can only be put in place IF it is part of future planning conditions.

The residents of South Swords request that a 70% rule for Northern Runway take-offs is, in future, implemented on an explicit **daily or weekly basis** rather than the current "unplannable" wind based methodology. By way of example, if a **daily** implementation is mandated then *70% of all daytime take-offs would occur on the Northern Runway EACH & every DAY*. The Northern Runway would *host day time landings for the balance of "daily" daytime operations duration*. This will, at least, guarantee "somewhat quiet time" each day or week for South Swords. In addition, the residents request that the "quiet time" slots each day or week are *selected AFTER consultation & agreement with South Swords community groups*.

Please include the requirement of an explicit daily or weekly implementation of the 70% daytime operations take-off rule for the Northern Runway (with a appropriate fixed time slot detail derived by agreement with South Swords community groups) in your adjudication on F20A/668.

Finally, the residents of South Swords would further **request that an oral hearing D OES take place for this planning application**, specifically because of its very significant impact on a large number of Fingal residents and the fact that an abridged & unvalidated environmental impact assessment was deemed sufficient by the Planning Authority. They would also request that a spokesperson from South Swords be afforded the opportunity to highlight their legitimate pollution concerns at this hearing.

Thanking you again for your time and consideration

- **Lorraine Deeley** for **Ridgewood** Residents Group
104, The Oaks, Ridgewood, Swords Co Dublin
K67D250

- **Margaret Kelly** for **Boroimhe** Residents Group
38 Boroimhe Hazel, Swords, Co Dublin
K67KX64

- **Myles Caulfield** for **River Valley** Residents Group
18 Hilltown Close, River Valley, Swords, Co Dublin
K67W985

- **Gerry Sweeney** for **Forest Great** Resident's Group
Forest House, Forest Road, Swords, Co Dublin
K67WH41

Email : **WERTY.MALSWEEN.2018 @ VMAIL.COM**

Phone : **083 8614706** /

A large number of other residents in South Swords & Fingal wanted to have their names added to this submission But it was not possible due to short term health issues (Rivervalley) , work travel (Boroimhe) etc to both finalize the submission and then collect their addresses & Eircodes within the very tight 5 week deadline.

However , below is a sample of partial detail the some of the concerned residents :

Mark O'Keeffe K67PE03

Maria Comiskey Bell K67YE10

Jolanta Sada Ridgewood

Adrienne Kelly K67 XT 89

Keith Hogg Ridgewood

Denise Monks Ridgewood

Damien Finglas Ridgewood

Stephen Coakley Ridgewood

Brian Courtney Ridgewood

Joanna Jurczyk Ridgewood

Laura Watson Ridgewood

Susan Farrell Ridgewood

Enid Richardson Ridgewood

John Dennehy Ridgewood

Jonathan Kingham Ballyboughal

Dan Foster Donabate

Michael Maher Forrest Great

Ray Gegan Forrest Great

Joseph Sweeney Forest Great

Karen Hickey

From: Gerry S <gerry.macsween.2018@gmail.com>
Sent: Wednesday 13 December 2023 20:38
To: Appeals2
Subject: Planning Authority Refewrence Number F20A/0668 - Receipts 119582/3
Attachments: Observation_Version 1.docx; Dublin_Airport_Submission_Version3.docx; Resident_List.docx

Hi ,

I dropped in two observations today (receipt numbers above)

I now attach soft copies for your records.

Best regards

Gerry Sweeney

For the attention of inspectors assessing Bord Pleanala

Your Case Ref : ABP-314485-22 Planning Authority Ref F20A/0668

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For the attention of inspectors assessing Bord Pleanála
Your Case Ref : ABP-314485-22 Planning Authority Ref F20A/0668

Very recently a large majority of Fingal councillors voted in favour of keeping the night time flying restrictions on Dublin Airport placed by ABP in 2007. Now local democracy, as well as ABP, has spoken. Indeed, we strongly argue that the case for the enlightened "balanced" approach to Irish aviation industry development, originally set out by ABP in 2007, is very much stronger in 2023. The reasons for this include:

- An estimated 60% increase in daytime airport capacity afforded by the addition of a second parallel runway
- The continuing serious deficiencies with Dublin airport nighttime rail & Luas transport links
- The current major and increasing imbalance in the development of our three major airports of Dublin, Cork & Shannon with, for example, nighttime air freight heavily concentrated in Dublin.
- The recent surge in urbanization of the Fingal & Greater Dublin regions which border Dublin airport, with, for example, developing residential amenities (e.g. Gaa pitches) in Forrest Great, South Swords.
- And, most importantly, the imminent existential climate change crisis (Dublin Airport having the dubious distinction in 2022 of being the biggest single CO2 emitter on the island of Ireland).

These arguments hold even stronger weight because of the deficiencies in the Daa submissions purporting to support the proposed changes to the 2007 conditions.

Let us attempt to summarize these deficiencies and then, for each set out the supporting evidence:

- **Aviation Noise Prediction Models without independent validation or peer review are unsound and unsafe.**
- **Aviation Noise Predictions Models relying exclusively on crude time averaging metrics fall unacceptably short of current best practice and are unsound and unsafe.**
- **Aviation Models, which rely on both obsolete and insufficient historic data without independent validation, used as the key source of aircraft ground noise predictions are unsound and unsafe.**
- **The Environmental Report core operational "assumptions" (unvalidated) for twin parallel runways are materially different from the now emerging actual usage data (since full operations commenced) leading to unsound predictions.**
- **The Environmental Report predictions on South Sword's air pollution impacts, which are based on obsolete historic data, have not been independently validated and hence unsound and unsafe.**
- **The Environmental Report substantially ignores the significant technical challenges of installing a credible night flying residential insulation scheme.**

Supporting evidence:

- **Aviation Noise Prediction Models without independent validation or peer review are unsound and unsafe.**

Rationale

Any prediction should be accompanied by robust validation studies. This is the best practice protocol for noise mapping in accordance with the EU Noise Mapping Directive. We are not aware of any validation study done for Dublin airport (from the various rounds of noise mapping in 2007, 2012, 2017 and again in 2022). The input data used up to now to support this night time flying proposal are demonstrably incorrect, hence we must conclude that the model output is completely unreliable, even though the model itself may be widely used and accepted.

It should also be noted that ANCA state the following: "The noise model shall be validated using local noise and track keeping performance data from Dublin Airport's systems" – in their NAO document "Noise Abatement Objective Report for Dublin Airport, November 2021". It should be highlighted that this has not been done, nor has it been made available.

- **Aviation Noise Predictions Models relying exclusively on crude time averaging metrics fall unacceptably short of current best practice and are unsound and unsafe.**

Rationale

The use of Lden and Lnight in isolation would not be considered current best practice, and any assessment of noise from Ireland's largest, busiest (and most important) airport must use best international practice in its prediction. In particular, the removal of the current movement cap in the new night time flying proposals is almost unique among all large international airports and is felt to almost certainly lead to significantly increased sleep disturbance for a large number of residents.

Also, in support of the above assertion please review the attached paper¹ from Canada which states "*As a complement to cumulative indicators, the use of single-events indicators that address maximum sound levels must be favoured in future studies on environmental equity, but also in diagnostic and monitoring studies. The latter are considered to be more representative of the disturbance experienced by the surrounding population*".

¹ Thomas Audrin, Philippe Apparicio, Anne-Marie Séguin, Aircraft noise and environmental equity in Montréal: A comparison of noise indicators and an analysis of the impacts of COVID-19, Transportation Research Part D: Transport and Environment, 106, 2022,

- **Aviation Models, which rely on both obsolete and insufficient historic data without independent validation, used as the key source of aircraft ground noise predictions are unsound and unsafe.**

Rationale

Any assessment of airport noise, should include an assessment of ground operations at the airport. According to EU Directive 2015/996, even noise produced during basic ground operations (i.e excluding "ground noise" based take-off and landing) should be considered in a similar manner to road and industrial noise, and should be modelled. In fact, the Dublin Airport Noise Action Plan 2019-2023 includes the consideration of ground operations, as it states "noise from aircraft (basic) ground operations can also give rise to adverse effects". The Action Plan also notes that noise from "basic" ground operations may be particularly intrusive during the nighttime.

But further, and uniquely for South Swords, noise from aircraft during take-off mode, but while still accelerating on the ground, is the main source of the very significant noise pollution in this urban zone for a number of reasons. These would include the local terrain geography, the north runway elevation, the standard north runway ground based take-off trajectory which tracks just south of South Swords from east (power up) to west (lift-off), the absence of a protective noise mitigation earth berm, the south westerly prevailing wind direction, the downward noise refractive effect of this supporting prevailing headwind, the concentration of 80% (based on the DAA's own data since full operations commenced) of take-offs on the northern runway etc. It is hence impossible for the current model predictions to arrive at a realistic balanced assessment of the inevitable additional South Swords ground noise pollution, as they are based on missing recent (e.g no Boroimhe) or obsolete historic (Rivervalley) data based solely on a runway 1.6km further south and using a completely different single runway based takeoff/landing protocol.

Chapter 13 of the Daa sponsored environment impact assessment report attempts to focus without distinction on airborne & "ground noise" for aircraft "while using the runway system". However, the "ground noise" measurements presented as relevant were taken before the new runway commenced and the predicted "future" model conclusions have not been validated against current South Swords full operational ground noise data. Hence, any conclusions drawn from these models are palpably unsafe.

Chapter 14 of the Daa sponsored environment impact assessment report attempts to focus on "basic" ground noise "as mainly aircraft taxiing and aircraft using auxiliary power units". This analysis is based on even older data before operations on the new runway commenced, appears to ignore the primary ground noise source for South Swords being aircraft in take-off mode and ignores completely the radically changed noise dynamic of dual runway operations. As a result any conclusions based on this data are also completely irrelevant for South Swords.

Sadly, a further result of these deficiencies is that the models are unable to explore any practical ground noise amelioration measures, such as earth berms, as no proper technical model validation analysis has been done. This is particularly pertinent, as at a recent meeting with ANCA they expressed the view that a well designed earth berm adjacent to the northern runway could give material "ground sourced" aircraft noise pollution amelioration to South Swords.

By way of illustration of the importance of this consideration, the attached link to a simple ground noise mitigation calculator showing the potential benefits of well designed earth mound : (see <https://www.wkcgroup.com/tools-room/sound-barrier-calculator/>)

An alternative ground noise barrier calculator is found at the following link :

(<https://noisetools.net/barriercalculator>)

Finally, it might also be worth noting by way of contrast that the Environmental Impact Assessment Report for development at Waterford Airport included an assessment of ground operations at that airport.

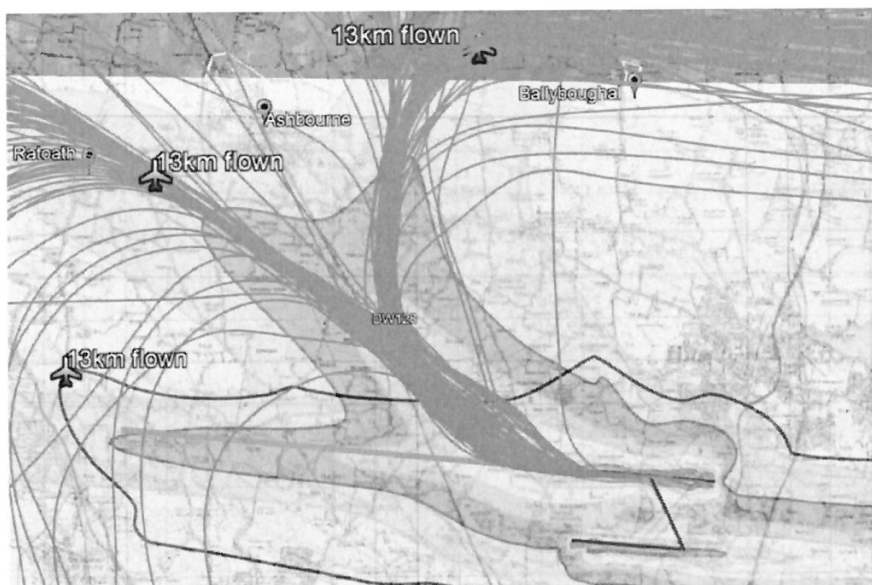
(see <https://www.waterfordcouncil.ie/media/projects/airport-extension/ftco/EIAR%20Volume%202%20-%20Main%20EIAR/Chapter%2011%20-%20Noise%20and%20Vibration.pdf>)

- **The Environmental Report core operational "assumptions" (unvalidated) for twin parallel runways are materially different from the now emerging actual usage data (since full operations commenced) leading to unsound predictions.**

Rationale

A key section of the Daa commissioned AECOM Environmental Report supporting the proposed Daa changes is the section dealing with "Aircraft Noise & Vibration". The report states that "noise measurements were taken at sensitive locations". It further asserts that "when the wind is coming from the east (approximately 30% of the time) aircraft will take off into the east". However, the Daas own statistics show that, since full operations commenced on the northern runway, aircraft have been taking off into the east only 20% of the time. This reduces the "quiet time" actually enjoyed in South Swords by one third! Our current understanding is that no accurate mechanism has been set up to measure adherence to this fundamental 30% metric underpinning the Daa sponsored Environmental Report recommendations. We further assert, based on current independent validating data and observation (rather than spurious model prediction conjecture) that the Environmental report "supporting" the Daa proposals is flawed and hence fundamentally unsound. It should not and cannot be used to support any changes to current planning conditions.

The starkness of this deficiency is illustrated by the following aircraft track emerging data diagram:



- **The Environmental Report predictions on South Sword's air pollution impacts, which are based on obsolete historic data, have not been independently validated and hence are unsound and unsafe.**

Rationale

We understand that a very important consideration for ABP inspectors in arriving at the "balanced" conditions set out in the 2007 planning conditions was the health and safety of all stakeholders including the aircraft travelling public, the airport neighbouring residents and the airport staff. Nothing has changed to moderate these health & safety concerns. In fact, with increased urbanization in the Greater Dublin Area, Fingal & surrounding counties and an aging population, the original enlightened approach to nighttime protections carries even greater weight. Poorer air quality, as a result of the proposed changes, is a particular concern for the approximate 12,000 residents of South Swords, given the proposed operational plan for new runway combined with the prevailing winds. The AECOM report includes no model prediction validation of the specific impact on South Swords of moving the vast majority (almost 100% for weeks on end) of continuous aircraft take-offs to the northern runway. We assert that the current nearest air quality permanent monitor is too far east to give meaningful protective cover to South Swords. This fundamental omission makes this environmental report "unfit for purpose" as a basis for assessing the health & safety robustness of Daa proposals.

- **The Environmental Report substantially ignores the significant technical challenges of installing a credible night flying residential insulation scheme.**

Rationale

Another fundamental omission from the environmental report is any model prediction & associated validation of the likely effectiveness of a residential sound insulation scheme against night time noise. In the context of aircraft noise, there is very little scientifically measured data for the sound transmission loss of exterior walls and there is almost none that is representative of modern Irish construction practice. Further, measurement data for the sound transmission loss of various roof structures is not currently available at all.

Our investigations to date have found no current expertise in this key specialism in either the Daa, Fingal CC or ANCA. We have been unable to contact any specialist contractor who will assess the requirements. The supporting environmental report sets out no analysis of the house types impacted, no benchmark mitigation standard to be achieved, no investigation of the likely costs of this mitigation, no criterion for assessing the achievement of any benchmark & no follow-up accredited validation process to assure adherence to this benchmark. In short, the environmental report falls well short of the professional standards that might be reasonably expected for a major health & safety issue of this nature and is hence completely inadmissible as a credible scientific document supporting the Daa proposals.

Finally, the residents of South Swords would request an oral hearing because of potential very significant environmental impact on a very large number of Fingal residents.

Thanking you for your time and attention to these urgent resident concerns

Lorraine Deeley of Ridgewood Residents' Group

104, The Oaks, Ridgewood, Swords, Co Dublin

K67D250

Margaret Kelly of Boroimhe Residents' Group

38 Boroimhe Hazel, Swords, Co Dublin

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Jonathan Kingham Ballyboughal

Dan Foster Donabate

Michael Maher Forrest Great

Ray Gregan Forrest Great

Joseph Sweeney Forest Great