

20th April 2026

**Submission to the Irish Aviation Authority
Draft Decision – Dublin Airport Winter 2026 Slot Capacity**

Submitted by:

Adrienne (née McDonnell) Hughes

On behalf of the McDonnell Family (5 households)

[REDACTED]

1. Introduction – Who We Are

We are five family households residing on [REDACTED] North County Dublin, on lands that have been in the McDonnell family for generations.

Our homes were granted full planning permission between 20 and 45 years ago.

We are located directly in alignment and between the flightpaths of both the South Runway and the New North Runway at Dublin Airport, resulting in repeated overflight and concentrated noise exposure.

All five households fall within the 69dB contour and are formally recognised under the Voluntary Dwelling Purchase Scheme.

We are among the most materially and continuously affected residential cohort arising from airport operations.

We have been continuously engaged in all relevant processes including:

- The 2007 Oral Hearing
- Fingal Development Plans
- Ministerial engagement
- Submissions to the IAA, daa and Fingal County Council
- Ongoing High Court Judicial Review proceedings
- Recent submission to the Joint Oireachtas Committee

We are not opposed to national infrastructure. However, we strongly object to regulatory decisions that facilitate expansion without resolving known deficiencies relating to noise, health, planning integrity and legal process.

2. Core Position

The proposed increase in Winter 2026 slot capacity is:

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- Premature
 - Unsupported by operational necessity
 - Inconsistent with planning and infrastructure realities
 - Disproportionately impactful on a small number of communities
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3. Lived Experience – Reality vs Modelling

Independent monitoring and lived experience demonstrate:

- Peak aircraft noise events significantly exceed modelled expectations
- External noise levels are estimated in the range of 90–100 dB

This is far in excess of WHO guidance levels (30 dB night / 35 dB day indoors).

There is a clear and persistent disconnect between modelled assumptions and real-world impact.

4. Capacity is Being Defined Incorrectly

Capacity is currently assessed based on:

- Runway throughput
- Taxi times
- Scheduling efficiency

This approach fails to incorporate:

- Human health impacts
- Real noise exposure
- Environmental constraints
- Community sustainability

Capacity must reflect real-world conditions, not theoretical modelling alone.

5. Evidence from IAA Documentation

The IAA's own supporting material confirms:

Minimal Operational Benefit

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- Increased capacity results in only marginal changes in taxi times
- Overall operational impact is negligible

No Requirement for Capacity Increase

- Demand can be accommodated within existing limits through redistribution

Airline-Driven Decision Making

- 93% of Coordination Committee votes supported increases
- Committee composition is heavily weighted toward airline interests

Peak Period Intensification

- Additional flights will be concentrated between 07:00–19:00
- This will increase clustering and reduce respite for residents

Key Conclusion

Residents are being asked to absorb increased environmental and health impacts for negligible operational gains.

6. Night-Time Protections

Night-time restrictions are critical protections arising from the 2007 planning process.

These must not be eroded through:

- Increased night-time slots
- Reallocation of unused night capacity
- Incremental scheduling changes

Night-time disturbance represents the most harmful impact on human health.

7. Legal and Regulatory Uncertainty

There remains:

- Ongoing High Court Judicial Review proceedings
- Uncertainty regarding noise quotas and EU compliance

Determining slot capacity in advance of legal clarity:

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- Pre-empts outcomes
 - Undermines procedural fairness
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8. Cumulative Impact and Infrastructure

Our community is already impacted by:

- North Runway operations
 - Increased traffic volumes
 - Proposed Western Access Road
 - Future MetroLink development
 - Environmental and air quality concerns
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Indicative Road and Land Impact

There remains significant uncertainty regarding proposed road infrastructure associated with Dublin Airport.

Indicative routes identified in planning documents suggest:

- Potential road alignments crossing the McDonnell family farm
- Infrastructure passing in close proximity to our homes
- Direct linkage to the Cherryhound roundabout

We are also located in direct alignment with the North Road roundabout and associated airport access corridors.

Despite this:

- No final route has been confirmed
 - No detailed design has been presented
 - No meaningful consultation has taken place
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Capacity vs Infrastructure – Fundamental Issue

One of the original rationales for the passenger cap at Dublin Airport was limited surface access infrastructure.

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This reflected the broader limitation of road capacity, traffic constraints and the absence of fully developed supporting transport infrastructure.

However:

- The passenger cap is now being removed
 - Slot capacity is being increased
 - Critical road infrastructure remains undefined
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Conclusion on Infrastructure

Capacity is being increased without clarity on how that capacity will be supported in practice.

This creates:

- Increased aircraft noise exposure
 - Potential future road impacts on our lands and homes
 - Continued long-term uncertainty for residents
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9. Human Impact

Our five households:

- Are located on shared family lands
- Provide daily care to our 88-year-old mother
- Have lived with uncertainty for nearly two decades

This is not an abstract policy issue — it is a continuous lived experience.

10. Conclusion

We now face a situation where:

- Capacity limits are being removed
- Operational intensity is increasing
- Decisions are being made ahead of legal resolution
- Infrastructure remains unresolved

This is not a balanced or fair approach.

11. Key Requests

We request that the IAA:

1. Do not increase Winter 2026 slot capacity pending Judicial Review
 2. Maintain strict and enforceable night-time protections
 3. Incorporate real-world noise data into all determinations
 4. Recognise human health as a primary constraint on capacity
 5. Apply a precautionary approach following removal of the passenger cap
 6. Ensure compliance with EU Regulation 598/2014
 7. Align capacity decisions with confirmed infrastructure planning
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Final Statement

We are not opposed to progress.

However, progress must not come at the expense of fairness, health, and due process.

Adrienne (née McDonnell) Hughes

On behalf of the **McDonnell Family (5 households)**