

SUBMISSION

TO

IAA

DRAFT DECISION

SUMMER 2025 SLOTS AT DUBLIN AIRPORT

ON BEHALF OF

SHEELAGH MORRIS

SEAN FOX

PEGGY HOEY -LISSADELL – THE WARD

HELENA MERRIMAN – KILREESK LANE

DATE : 25<sup>th</sup> September 2024.

We are making a submission for each and all of the above named residents living in Millhead, St Margarets, Kilreesk Lane and Dunbro Lane, in relation to the Draft Decision on slots for Dublin Airport for Summer 2025.

Dublin Airport on behalf of DAA, the applicant received grant of permission (F04A1775 – PL06F.217429) in August 2007 with 32 conditions.

The construction of Runway north was granted on the basis:

Condition 3(d) No night flights between 11pm – 7am on north runway ( Scheduled)

Condition 5 - a cap of 65 ATM ( aircraft movements ) from 11pm to 7am on existing runway 10R-28L on the opening and operation of North Runway.

Since then DAA have totally disregarded those conditions and have breached the 65 ATMs from August 24<sup>th</sup> 2022 and now expect to use North runway for 18 hours a day, following draft decision by ABP last week.

All agencies involved in Dublin Airport, and in the planning process must come together to ensure the flightpath changes are reverted back to what was originally and legally agreed by ABP in 2007. This was the result of an intense 10 day oral hearing in 2006, with representation from St Margarets Concerned Residents Group, UPROAR, and others, raising significant issues, on what has evolved today, despite the outcome and conditions put in place to protect communities impacted.

North Runway did not require planning permission on construction and operation and therefore the residents of Newtown were subjected to the impacts on their lives and homes, caused by aircraft noise and greenhouse gases (PM Fine Particulate matter – impacting health impacts such as cardiopulmonary disorders, respiratory disorders and stroke) with no accountability by DAA. (Aer Rianta then)

In our submission in 2005/6 we recommended that growth should take place at Shannon and Cork, and spread the economic benefits across the country. This was rejected. Now we see from the CSO figures for 2023 that DAA breached the passenger cap of 32 million by 1.26 million and also in 2019. This was one of the ABP conditions on the grant of permission to construct and operate Terminal 2.

DAA have now publicly confirmed they will breach the cap AGAIN in 2024.

There was no consideration made, in view of planning applications in process, challenging and attempting to erase and override the planning system, when summer 2023/24 slots were allocated, totally disregarding the planning conditions in place that should have been adhered to. It was as if those planning conditions did not exist (32 million cap – 65 ATMs on South Runway during night time hours with NO scheduled flights to take place on Runway North).

#### CSO Figures to be used.

Fingal County Council have stated that, based on decisions by ABP, that the CSO figures (which adhere to the International Aviation Convention) on counting passengers should be used for planning and enforcement purposes.

The IAA S25 plan should use the CSO's figures RATHER THAN the figures MODIFIED by the DAA to remove transit passengers, contrary to the International Aviation Convention.

#### NIGHT TIME FLIGHTS

The hourly runway schedules should be amended to reflect the recent Relevant Action decision by An Bord Pleanála. The summer 2025 schedule should include the annual aircraft movement limit of 13,000 ATMs between the NIGHTTIME hours of 23.00 and

7.00 (inclusive local time) with aircraft movements split between winter (3,900) and summer (9,100) .

Separate seasonal tables should be provided within the summer 2025 decision to clearly show the allowable limits at nighttime during summer and winter.

The IAA are fully aware of the noise situation as a result of divergent flight paths from the North runway. This is causing huge distress to tens of thousands of people. The public note and appreciate the recent efforts by IAA to control the annual passenger cap and to help keep the airport compliant with planning conditions. We note the IAA's role also has an environmental element and in that regard, IAA should not have approved the north runway flightpaths which are currently in use. These flightpaths shower noise on over 30,000 people. No public consultation was ever sought for these flight paths. The original flight straight out flightpaths would improve the noise situation enormously.

## Conclusion

In Conclusion the planning conditions dictate a cap of 32 million for Dublin Airport and 65 movements on the South Runway from 11pm to 7am per the planning conditions F04A/1775 and PL06F. 217429 with nighttime hours 11pm – 7am on North Runway for scheduled flights. The planning conditions ARE the planning conditions and Dublin Airport should and must work around that for their operations, in the interest of the population significantly impacted by the flightpaths. The allocation of slots should be based on the set conditions in 2007.

An internal noise measurement taken on Decibel X ( with full insulation) indicated 50db Lamax on 17<sup>th</sup> September and 66dbLamax with a top window open for fresh air between 7am – 8am at Millhead St Margarets.

DAA have yet to assess the noise insulation installed in homes close to the runway and this has not been completed to our knowledge. The VDIS is being rolled out currently . (condition 7 ) The nuisance levels have not significantly subsided to permit residents, included in then 63-69db laeq noise contour , the recommended WHO levels of 40Db at night and 45db during the day.

The LDen and Lnnight metrics used are based on an average – not the SEL ( single event Levels of Lamax ) and the frequency of these, therefore is a camouflage of the true impact on the population impacted .

Therefore the conditions must be the basis for the allocation of slots for Summer and Winter 2025.