

Cllr David Healy ,
Howth Malahide Ward,
Green Party /Comhaontas Glas
087 6178852
www.davidhealy.com

Submission to draft Dublin Airport Local Area Plan and Variation to County Development Plan

Climate Change

In response to the public consultation in September 2018 in advance of the drafting of the Local Area Plan (LAP) I made the following submission

Climate Change and aviation growth

The analysis of climate change in the document is inadequate. The National Mitigation Plan should be included in the policy documents listed on page 8.

The paper discusses a few minor aspects but doesn't address the central issue, increasing aviation emissions. The reference to the EU ETS is an inadequate summary description, misleading in that it doesn't acknowledge that the ETS only applies to flights within the EU.

The predictions of aviation growth seem to be predicated on action not being taken (in Ireland or internationally) to give effect to the Paris Agreement.

The analysis of climate change should include the differential climate impacts of aviation emissions at different times of the day.

Predicted aviation demand

The draft LAP contains predictions of aviation growth which as I referred to in my previous submission seem to be predicated on the non-implementation of the Paris Agreement. The LAP should set out the basis for the predictions used and explain why they do not reflect implementation of the Paris Agreement.

The next step in the process is for the elected Council to consider these submissions. The report to the Councillors should include alternative predictions in ranges consistent with the implementation of the Paris Agreement.

Day and night flights

My request in my previous submission for the analysis to consider the differential climate impacts of aviation emissions at different times of day has not been met. It appears that in the absence of specialist advice on the way aviation impacts on the climate, the planning

authority didn't understand the request. At this stage it is vital that the Council gets the expert advice that it needs to address the climate impact of flights using Dublin Airport.¹

The report to the Councillors should set out the options for control of climate impacts of flights to and from Dublin Airport taking account of the differential impacts of aviation at different times and using different flight paths.

No public authority is currently regulating aviation in this regard. However, Fingal County Council is required by the Climate Action and Low Carbon Development Act to have regard to the National Transition Objective and to the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State. Given the great flexibility and scope of the planning system, there is a wide range of options available to mitigate the climate impacts of flights using the airport. These could be more subtle than overall limits on flights, for example, requiring calculations of climate impacts of flights, mandating particular overall results to be achieved by the Dublin Aviation Authority. The report on this public consultation should include analysis of the options for controlling the climate impact of flights to and from Dublin Airport in planning conditions including taking account of the time of day and year.

Surface Transport

At the previous consultation I made the following comments:

Surface transport

The discussion of surface access seems to be oriented solely at passengers. The paper itself refers to over 13,000 jobs at the Airport; their travel needs and patterns also need to be considered. The analysis needs to consider the ability of public transport to meet far more of the airport travel needs. Given the dispersed nature of airport employment which can be hard to serve by public transport, there should be a specific study for the LAP of the potential to use cycling to meet travel demands.

Cycling

There has been no specific study of the potential to use cycling to meet travel demand. I have referred the Council on a number of occasions to the Propensity to Cycle Tool (www.pct.bike) as an example of the sort of analytical tool which should be used and I again recommend that there be a specific study for the LAP of the potential of cycling.

In the absence of any targetted analysis, it is clear however that there are a number of cycling routes which should be included in the LAP. In particular the Santry River Greenway would provide an important high quality cycle link between the Airport and a large population to the east and south-east of the M1 motorway. It should be included in this LAP.

¹ <https://www.newscientist.com/article/2207886-it-turns-out-planes-are-even-worse-for-the-climate-than-we-thought/>

Additionally, the draft LAP seems to omit the objective in the County Development Plan of providing walking and cycling access across the M50 along the Metrolink alignment.

Public Transport

The LAP suggests that an east-west public transport link is something to take forward only in the context of a new east-west distributor road. This is not correct; the link could be a rail-link or a bus-only or bus and cycle road.

Water Quality

My previous submission said:

The airport and associated uses including car parking are polluting local rivers and streams. In keeping with the obligations in the Water Framework Directive, the LAP must address how this pollution will be prevented.

Unfortunately the LAP addresses water quality only in general terms. The LAP should include the measures necessary to achieve good status in the waterbodies in the area, in accordance with the requirements of the Water Framework Directive.

Noise

The LAP and Variation present noise maps which do not reflect the existing planning conditions applicable to the Airport. This is misleading. The Council should supply maps reflecting the planning conditions which restrict night-time flights for consideration by the Councillors in making the LAP.