

Planning & Strategic Infrastructure Department
Fingal County Council
County Hall, Main Street
Swords, Co. Dublin



January 29th, 2024

RE: Planning Application F23A/0781 by DAA PLC

A chairde,

Please accept the following observations to the above application on behalf of the Green Party Councillors on Fingal County Council.

Yours sincerely,

Cllr Ian Carey, Cllr Pamela Conroy, Cllr David Healy and Cllr Karen Power

1. Retention

The airport has already exceeded the passenger numbers limit which it is now applying to increase. In these circumstances, the application should be a retention application.

As further discussed in point 9 below, retention permission is also required for the removal of PFAs contaminated soil. It is our best understanding that this proposed further infrastructure relies on that retention.

In these circumstances, the application is invalid.

2. Climate impact of increased aviation

Aviation is a major source of GHG emissions. Findings from the 'Climate Trace' database in 2021, show that Dublin Airport was the largest emitter of GHGs in Ireland. The plans detailed in this application will lead to a significant increase in emissions from Dublin Airport. Fundamentally, plans to expand the airport are not consistent with stopping runaway climate change.

Through the Climate Action Plan, Ireland is committed to climate action across a range of sectors. Despite aviation being omitted from that plan, there is a commitment by the sector to be carbon neutrality by 2050, in line with the Paris Agreement.

This development will lead to a significant increase in GHG emissions and is not in line with the Paris Agreement. This expansion is not consistent with aligning with the 1.5°C target. The increase in passenger numbers from this expansion will render irrelevant any increase in efficiency through the use of Sustainable Aviation Fuel (SAFs) or other measures.

Claims in the EIAR that the impact of the development on climate is 'minor adverse not significant' is incorrect. Under the IEMA methodology, when determining the significance of emissions, you take into account whether it is increasing emissions away from a baseline trajectory towards net zero emissions by 2050. These new emissions are significant because they are continuing to push us off our climate targets and comparison with existing emissions don't minimise their significance.

By building infrastructure that generates significant emissions we are risking those assets becoming stranded as public policy to align the sector with our climate targets becomes effective. The alignment of aviation with the Paris Agreement could mean this additional investment in Dublin Airport is wasted.

Existing commitments within the sector to meet carbon neutrality by 2050, the ReFuel EU Aviation Initiative, and the Carbon Reduction and Offsetting Scheme for International Aviation (CORSIA), are all initiatives which will impact the cost of flying and in turn demand. Although we do not have demand management measures likely to align aviation with 1.5°C targets the mentioned measures above will increasingly impact demand the closer we get to 2050.

3. Forecasts of passenger growth do not take account of climate action

The passenger growth that is forecast to justify this expansion of Dublin Airport does not take into account measures to tackle climate change. The strategic capacity document commissioned by the Department of Transport under the current aviation strategy "Review of Future Capacity Needs at Ireland's State Airports" by Oxford Economics analyses a number of scenarios - a baseline, upside, and downside projections for passenger growth. The passenger figures are based, in part, on IATA generated projections. The International Aviation Transport Association (IATA) is a trade association for 320 airlines. The methodology employed in the analysis does not factor climate action into the projections despite a number of international initiatives designed to reduce emissions. There are no measures which will reduce emissions in line with climate targets which do not impact the cost of flying. The cost of flying has a significant impact on demand. Overall, it is not clear how efforts to meet the aviation sector's own goal of carbon neutrality by 2050 will impact passenger numbers. We need an analysis of the impact of existing and proposed climate measures on passenger numbers before major investment in additional infrastructure. The scale of the proposed increase in passenger numbers is not supported by National or Local Planning policy.

4. Noise

There are no noise mitigation measures included in the application and therefore the noise measures from 2007 remain in place which are outdated. There is no nighttime insulation scheme proposed for those exposed to greater than 55dB Lnight. Some areas have been exposed to greater than 55dB Lnight in 2019, 2022 and also in 2022/2023. As the 32mppa is an Operating Restriction, the daa should have chosen section 34C of the Aircraft Noise (Dublin Airport) Regulations Act 2019 to amend the Operating Restriction

The daa continue to assess scenarios with the 65 nighttime (Condition 5) restriction in place, whilst ignoring the condition in reality. The noise contours for the current and future scenarios are not consistent with the Noise Zones in the Fingal Development Plan.

The health of Fingal and East Meath residents has not been properly assessed and addressed in this application. Provide clarification on differences in aircraft noise contours compared to the Noise Zones as shown in the Fingal Development Plan.

5. Drainage system

The goal of both infrastructure and operation as regards surface water should be managing the airport to avoid any flooding of houses or other buildings downstream. The new drainage system must have a community warning system for local residents to be alerted to the presence of chemicals in surface and ground water as soon as it is known to the DAA. Communication and full transparency needs to be at the centre of the new system.

6. Cycling infrastructure

The plans for cycling infrastructure in the airport must be credible and aimed at generating significant use. The connections to Swords through the pathfinder project and the city through BusConnects need to be met with significant and fit for purpose cycling and bike parking infrastructure central to the terminal, including bike lockers and secure and monitored parking. Any new bus services to the airport should support a multimodal approach and support the movement of bicycles as well as being fully accessible.

The airport has great potential for increased use of bicycles. Due to the nature of aviation in terms of local noise impacts, few employees live in walking distance. However, very many employees live within cycling distance. In addition, distances within the airport campus are often better suited to cycling rather than walking. It seems likely to us that there is major potential for both journeys to work and work-related journeys in the airport campus currently undertaken by car, to be made by bicycle or electric bicycle.

The work that has been done to in providing for cycling on the airport campus is well-intentioned but insufficient. There needs to be a rethink of the cycling and walking routes, to maximise permeability for the active modes.

Bicycle parking needs to be provided throughout the airport in all employment locations so that staff who cycle to work have secure parking close to their work.

The proposed junction redesigns fail to address the inadequate performance of some of the junctions as regards walking and cycling. The "slip lane" design of Junction 2 Corballis Road South is a striking example. Cyclists simply trying to get past the airport northbound have to cross three sets of traffic lights to get through one junction. People going southbound past the airport by bicycle, or leaving the airport to go towards Dublin, have 5 sets of lights, requiring them to spend more than a full cycle of the indicative method of control to get through the junction.

The design should aim at improving the attractiveness of cycling both to and past the Airport.

7. Access issues with increased passengers.

The expansion of Dublin Airport is premature without Metrolink in place. The 32mppa cap was put in place due to surface access concerns. This has not been addressed in this application. The Proposed Development would endanger safety by reason of traffic congestion on the surrounding network.

The application proposes an increase in both passenger and staff car parking which is contrary to proper planning and sustainability and contrary to the Fingal Development Plan. Parking should not be increased at the airport as this will induce demand on a road system already at capacity.

It is implicit in the application that this new carparking is additional to reopening the private carparking facilities in the vicinity of the airport, granted permission by An Bord Pleanála in May

2019, known as "Quickpark" and which DAA propose to reopen if allowed by the Competition and Consumer Protection Authority. From a planning point of view that CCPA decision is immaterial, as that car park has a permanent permission and can be expected to reopen whoever owns it.

The application sets out how it is proposed to increase the parking provided above the caps set in Condition 23 of L06F.220670 (F06A/1248). However, we can't find any real justification for this other than an assertion that it is necessary.

The physical limits of private motor car access to the Airport, which led to the imposition of the parking limits in 2006, have not changed. There is no evidence presented in the application that some sort of physical limits on access by public transport and by bicycle have been reached.

The decision needs to be explicit about not increasing parking.

The increase in capacity at Dublin Airport is contrary to the National Development Plan and the Fingal Development Plan

8. Lack of effective consultation

This Infrastructure Application contains over 7k pages of technical documentation and contains an EIAR and AA reports and therefore the public should have been given additional time under the Aarhus Convention to read the submitted material. There is a severe lack of public consultation with no clinics or leaflet drops explaining the monumental amount of technical material.

9. Substantial soil contamination not effectively addressed

The airport has extracted 150,000t of soil contaminated by PFAs and exported it for treatment. This was done without planning permission. An Access to Information on the Environment request to DAA in relation to this work has been made but the information has not yet been received. However, it seems likely that the works in this application cover some of the same areas in the airport. The application fails to screen out PFAS contamination and Dublin Airport is hydrologically linked to the Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) along the Dublin Coast.

10. Night flights and divergent flight path issues need to be resolved before permission is granted for this infrastructure.

This application is premature pending the outcome of the Relevant Action (nighttime) appeal and contravenes section 37(5) of the Planning.

The divergent flight paths have never been assessed in terms of significance compared to the straight-out flight paths assessed in the planning of 2007. Fingal County Council is still investigating enforcement complaints over the divergent flight paths currently in use and therefore cannot rule on this planning application until the enforcement decision is made. The site notice does not mention that the DAA are requesting to use divergent flight paths which are different to the straight-out paths assessed in 2007.

Fingal County Council has issued enforcement proceedings against the DAA over breaching Condition 5 of the North Runway's planning permission. The DAA have sought to challenge this

decision by way of Judicial Review. The Planning Authority cannot decide on this application pending the outcome of that case.

The DAA have used the incorrect population datasets when comparing against the NAO, contrary to ANCA's advice and EPA guidance. Using the latest population datasets, the NAO is breached significantly. The DAA breached the NAO in 2022 with just 28.1m passenger.

The 32mppa cap is an Operating Restriction under EU598/2014 and needs to be assessed by ANCA.

Prior to making a decision on the planning application, the planning authority should seek the following additional information from the applicants:

Provide clarification on whether changes in flight paths have occurred since the planning permission for the Northern Runway was granted.

11. Ground transportation building

We welcome the intention for significant improvements to the experience of bus passengers waiting at the airport. We must remember that with the range of bus services to the airport, it is used by both aircraft passengers and by non-airport passengers who are simply availing of an interchange point.

It's important that it lives up to the goal. The current infrastructure is confusing and exposes people to the elements. In that context, comments like "The bus parking bays are *partially* protected" (our emphasis are worth fully clarifying.

As with all new buildings at the airport, the roof should be designed to be SUDS-compliant.

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