

Fingal County Council,  
Main St.  
Swords  
Co. Dublin  
K67 X8Y2  
12<sup>th</sup> March 2025

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

**RE: Planning Application F25A/0049E by DAA PLC**

A chairde,

Please accept the following observations to the above application. Some of the issues are addressed in the observations which I and my party colleagues made on Application F23A/0781 which overlaps in subject matter with this application.

**Validity issues including failure to apply for 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.

The divergent flight paths currently being used at the airport have not 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 passengers.

The outstanding non-compliance with current permissions needs to be resolved before any further permission is granted which could have additional impacts on noise-sensitive receptors such as houses.

The airport has extracted 150,000t of soil contaminated by PFAs and exported it for treatment. This was done without planning permission. Retention permission is also required for the removal of this contaminated soil.

This application contravenes section 37(5) of the Planning Act.

In these circumstances, the application is invalid.

### **Climate impact of increased aviation**

Increasing passenger numbers as proposed in this application will lead to a significant increase in emissions from Dublin Airport. Fundamentally, plans to increase aviation are not consistent with stopping climate change, in the absence of other effective action, which has not been put in place.

(If DAA wishes to claim that other effective action has been put in place and will have an impact on aviation in coming years, their forecasts for passenger demand should reflect that analysis.)

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 the 1.5°C nor the 2°C target. The increase in passenger numbers from this expansion would overwhelm any reduction in emissions due to increased efficiency, the use of Sustainable Aviation Fuel (SAFs) or other measures.

Addressing the climate impact of aviation will require increased efficiency, the use of alternative fuels, measures to reduce non-CO2 impacts and measures to limit the scale of aviation. This application is inconsistent with the last of these.

### **Noise**

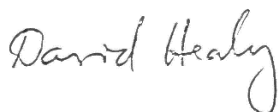
There are no noise mitigation measures included in the application and therefore the noise measures from 2007 remain in place which are outdated. There is no nighttime insulation scheme proposed for those exposed to greater than 55dB Lnight. Some areas have been exposed to greater than 55dB Lnight in 2019, 2022 and 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. Correct assessment requires clarification on differences in aircraft noise contours compared to the Noise Zones as shown in the Fingal Development Plan.

Thank you for considering the above observations.

Best regards,



Cllr. David Healy