

SUBMISSION TO DRAFT FINGAL DEVELOPMENT PLAN 2023-2029.

St. Margaret's, The Ward Residents Group Proposal for an Expert Group Study of the Area.

Motion #1 An International Expert Group shall be established immediately to consult and work with The St. Margarets/The Ward Community, Fingal County Council and DAA to review the current and future impact of Dublin Airport Expansion and associated Airport Infrastructure into the community, particularly within noise zones A and B, to include a study on Health effects and to provide a report with recommendations of proposed mitigation measures for the proposed changes in character of the St Margarets/The Ward Community.

Motion #2 The state lands at Thornton Hall are designated for relocation of St Margarets/The Ward Community members in accordance with the Development Plan policies and objectives 2023-2029 and those who must be relocated in accordance with the recommendations of the International Expert Group Study.

1. Executive Summary.

The following summarises the situation to date.

- Dublin County Council Development Plans in the 1990's state that local area plans are to be produced to provide rural village housing for St. Margaret's / The Ward area at Coolquay and Rivermeade.
- Thirty years later Fingal County Council have still not produced a local area plan for Coolquay, and no housing has been constructed at the Coolquay RVI.
- In 2018 Fingal County Council adopted a local area plan for RVI housing for Rivermeade. Fingal County Council granted planning for a proposed phase 1 housing development. However An Bord Pleanála refused permission on the grounds that the LAP was defective as there were no guarantees that the required local upgrades required to Toberburr Road would be provided by Fingal County Council. The LAP is therefore a "Dead Duck" as Fingal will not provide the required road upgrades as set out in their own LAP. As a result no housing has been provided at Rivermeade for St. Margaret's / The Ward residents. Fingal County Council have received millions of Euro from DAA to improve the local infrastructure and money is not an excuse.

- In successive previous development plans and also in the proposed new draft development plan it is recognised that housing should not be allowed within the Inner Noise Zone as it is harmful to the health and safety of residents due to aircraft environmental noise. In recognition of this, members of St. Margaret's / The Ward community with close family ties within the inner noise zone are allowed to obtain permission to build a residence in an area 2km outside the inner noise zone. However there are no suitable sites available in those designated areas for this purpose. The proposed draft development plan also includes this criteria but has expanded 2km to 5km. There are no suitable sites designated for this purpose.

- In 2007 planning permission was granted for a new North Runway at Dublin Airport with restrictions being applied to night- time flights to protect the health of existing residents from aircraft environmental noise. Condition 28 of the planning permission insisted that a committee be set up between members of St. Margaret's community, Fingal County Council and Dublin Airport Authority to facilitate consultation with the existing community in accordance with the policies and objectives of Fingal's Development Plan 2005-2011. The policies and objectives of that development plan clearly state that due to airport expansion it is necessary to work together with residents to achieve significant incremental change, an approach which could ultimately completely alter the settlement character of St. Margaret's / The Ward. Objective DAO9 states "To develop a consultative board based on international practices involving the existing communities, Fingal County Council, DAA (Aer Rianta) and the appropriate stakeholders, to consult about the detail resolution of the future of the communities in the area and to seek consensus about the nature of change".

- As can be appreciated from the above nothing has been achieved on this front other than the expansion of the airport and applications for removal of planning restrictions. There is no designated area for the significant incremental change of the settlement character of the St. Margaret's / The Ward community. DAA want to increase night flights and expose existing residents to harmful aircraft environmental noise, a fact that Fingal themselves acknowledge by restricting development adjacent to the airport.
 - No housing or LAP for Coolquay.
 - No housing for Rivermeade due to inaction by Fingal County Council despite receiving large planning contributions from DAA to improve the local infrastructure.
 - No planning for relocation of community residents that are restricted within the inner noise zone or who will be forced to move due to the serious health effects of aircraft environmental noise.

- Contrary to the planning conditions of the North Runway Planning Permission "A consultative board based on international practices " has not been set up and has not consulted or interacted with the St. Margaret's / The Ward community regarding the consensus about the nature of change on the alteration of the settlements character."
- The priest house and local hall has been put up for sale by the Catholic Church, an indication of how the Airport has crippled the village of St. Margaret's. The local shop and Post Office was forced to close over 10 years ago.

ENOUGH!!!

The new development plan must designate the lands at Thornton Hall for relocation of residents of the St. Margaret's / The Ward Community and to set up an International Expert Group to consult and work with the St. Margaret's / The Ward Community to provide a report with recommendations of proposed mitigation measures for our community as set out above.

2.0 Introduction

At the outset we in St. Margaret's, The Ward want to clearly state that we are not opposed to the expansion of operations at Dublin Airport and support such expansions. However, where its proposed expansion affects the residents of St. Margaret's, appropriate mitigation measures must be included within the Business Plan for its expansion.

With reference to the attached map we note that The St. Margaret's, The Ward area is located to the west of the Airport. The current land use zoning is Green Belt / Rural. However, as noted on the attached map, St. Margaret's, The Ward area is now squeezed between the Airport to the east and general employment/heavy industry zoning to the south and west. There are also significant new road proposals dissecting the area such as the proposed Swords Western Distributer Road and new roads around the Western end of the North and South runways.

We note the DAA has provided 8 hectares of compensatory habitat at Thornton Hall to offset its necessary removal of hedgerows and trees. What about human population being affected? Where are the mitigation measures for our community members?

As Dublin Airport develops and as acknowledged by the revised Noise Zones in Variation 1 to the current Fingal development plan, the communities within St. Margaret's and The Ward areas are obviously being greatly affected by the past and proposed future expansion of the Airport. With the exception of a small local study area around the school and church areas of the village of St. Margaret's, The Ward, no study has been carried out on the greater St. Margaret's, The Ward communities as to what mitigation measures are required to allow these communities to survive under the proposed rapid development at Dublin Airport.

In order to ensure that effects of the Airport expansion on these communities is fully reviewed and mitigation measures are put in place we propose that Fingal County Council commit to the following Expert Group Study:

Due to the significant effects of the past and future Dublin Airport development/expansion into the communities of St. Margaret's, The Ward, Fingal County Council shall set up an Expert Group who shall review the future impact of Dublin Airport development/expansion on these communities particularly the areas within Noise Zones A and B and provide a report with recommendations of proposed mitigation measures for these communities.

The Expert Group shall consider all issues with respect to the effects of the Airport Expansion on these communities and shall liaise with the various stakeholders within these Communities. The lands at Thornton Hall shall be designated for relocation of residents of The St. Margaret's / The Ward community due to airport expansion.

3.0 St. Margaret's, The Ward : Who are they and what are they?

St. Margaret's is a parish in the Barony of Coolock, North County Dublin and is a chapelry in the Diocese of Dublin forming part of the benefice of Finglas and is located to the west of the existing Dublin Airport Terminals. There are three primary schools in the parish, St. Margaret's National School, Mary Queen of Ireland National School Rivermeade, and Kilcoskan National School at Coolquay. The parish church is located within the village of St Margaret's. The local post office and shop within the village has been closed for over ten years now. There is no shop in Rivermeade or Coolquay.

A fair ground was located in St. Margaret's for the sale of Horses and Cattle. Inhabitants of St. Margaret's have therefore been living there for Centuries. The Residents and the families in St. Margaret's have lived there for centuries and long before the airport established itself in the area. Refer to Fig.1 which indicates the area located within the St. Margaret's, The Ward Community.

Due to the proximity of St. Margaret's, The Ward to the airport, housing within the area has historically been restricted by land use planning, and in particular with respect to Red Approach areas located at the ends of the existing runway and the new northern runway which is scheduled to open in August of this year. However, in 1978 a housing estate at Rivermeade was constructed by Dublin County Council which consisted of some 150 houses for local needs residence.

The first flight from Dublin Airport was on January 19th , 1940. The terminal building was opened in 1941.

Three new concrete runways were completed in 1948 and 1950. After 10 years in operation, the airport had welcomed a total of 920,000 passengers. During 1969 the Airport handled 1,737,151 passengers.

In 1989, the current Southern Runway was constructed and at that time this runway did not require planning permission. This Runway was constructed adjacent to existing housing within St. Margaret's and the St. Margaret's community had to fight hard for the Airport Authority to provide at a minimum sound insulation to the houses affected as a minimum requirement for noise mitigation. Also, a new road network was constructed to accommodate this runway which included a road which ran through the then existing GAA grounds in the St. Margaret's Village. The Airport Authority granted a lease to St. Margaret's GAA for the current grounds at Kilreesk, St Margaret's' on which the St. Margaret's community constructed a community complex consisting of a hall, gym, tennis courts, changing rooms, walking track, floodlights, and ancillary parking. These grounds are located adjacent to the end of the proposed new Northern Runway now under construction.

3.1 Rural Housing Designation within St. Margaret's/The Ward area.

As a result of the development and expansion of Dublin Airport, construction of new housing within the Parish of St. Margaret's, The Ward, has been severely restricted. Two rural villages for future housing within St. Margaret's, The Ward, were designated by Fingal County Council at Rivermeade and Coolquay in the 1990's , but to date no private housing has received permission to build houses due to delays by Fingal County Council in providing workable sustainable local area plans for these proposed rural housing villages. This has forced community members to re locate outside St. Margaret's. Why has Fingal County Council not acted on these proposals? Why have they continuously ignored calls from the community to develop housing in these designated housing areas of the St. Margaret's, The Ward community that were specifically chosen by Fingal County Council for housing.

The Parish is therefore fragmented with the centre of the community activities located at the community and GAA complex. Community members brought up in St. Margaret's, The Ward, who were forced to leave the community due to lack of housing, now commute to the community complex and the GAA has survived and provides team sports for all juvenile age groups and adult teams both male and female. This has helped to keep the community alive and progressive despite fragmentation and lack of planned housing delays for decades.

The new northern runway is scheduled to open in August this year. In accordance with good environmental practice and for health and safety reasons operation restrictions for flights between the hours of 23.00 and 07.00 were imposed as a condition of the planning permission in order to ensure that existing residents adjacent to the airport are not subject to night-time noise that would be harmful to their health. This is not unusual and night flights restrictions are in force in most international airports for the same reasons.

Residents in St. Margaret's, particularly those affected by noise were never informed that night-time flights were to be used at Dublin Airport and it was always envisaged, like so many other International Airports that night-time flights would be restricted.

Planning Condition 3 (d) of the 2007 Planning Permission, prohibits the New North Runway for landings and take offs between the hours of 23.00 and 7.00. Condition 5 states that on completion of the new runway the average number of night-time aircraft movements at the airport shall not exceed 65 per night between 23.00 and 7.00.

The DAA now want these restrictions removed and applied to Fingal County Council and the Competent Authority to modify the existing planning conditions. This legislation has been enacted to conform to EU regulation 598/2014 on the establishment of rules and procedures with regard to the introduction of noise related operating restrictions at union airports within a balanced approach.

It is worth noting here that Dublin Airport Authority (DAA) have stated that both the Southern and Northern Runways at Dublin Airport have been planned since the 1960's and were included in development plans. However, we note that even if this were factual, DAA have not moved to secure lands or housing affected by the operation of the Airport and the health implications associated with environmental noise, nor have they invested in the promotion of alternative locations within St. Margaret's, The Ward, that would not be affected by Airport operations.

We note that it is not factual that the DAA included restrictions on development due to airport noise within development plans since the 1960s.

In a press release by DAA dated 20th February 2018, it states that "North runway has featured in successive local area and county development plans since the 1970's. Through excellent foresight and careful planning, the land for its development was safeguarded more than 40 years ago, and approaches have been left largely clear of development. This means the number of impacted residents is far lower than of other European capital city airports. For example, using 2014 data there are fewer than 500 houses inside the 60 dBL day control at Dublin Airport compared with more than 45,000 at Heathrow". However, we note Heathrow has night flight restrictions.

This press release which is attached also states that "The projected cost of €320 million for North Runway represents real value for money, particularly when compared with other similar projects in the UK which do not benefit from full development within their own land banks". "On a like for like comparison, the runway and ancillary systems account for 8 billion while a similar suite of works is being delivered for four percent of that cost at Dublin".

This is an outrageous statement as Heathrow are providing mitigation measures to the affected community, but the DAA feel they can railroad over community members to the detriment of their health.

On the westside of the Airport in The St. Margaret's / The Ward area, there are less than 150 houses located within zone A & zone B proposed noise zones which is a small amount of housing to be relocated if dangerous environmental noise by night- time flights are proposed.

4.0 Noise Problems

Environmental noise is one of the top environmental risks to physical and mental health and wellbeing, with a substantial burden of disease in Europe and is of growing concern to the general public and policy makers in Europe. Cardiovascular disease, stress, cognitive impairment, tinnitus are but a few of the range of health problems caused by exposure to environmental noise. Professor Munzel of the University Medical Centre, Mainz, Germany presented his research to the St. Margaret's, The Ward community "Aircraft noise and cardiovascular and cerebral disease" this year. This presentation was shared with the DAA and Fingal County Council.

The findings of this research and the effects of Aircraft Environmental noise on the human population most affected is of great concern and alarming as to the detrimental health effects of such exposure.

The World Health Organisation (WHO) issued " Environmental Noise Guidelines for its European Region (2018)", which is a very detailed examination of Environmental Noise and its health effects. In its document WHO "strongly" recommend for exposure to Aircraft noise that average noise exposure be limited to 45dBLdenfor daytime noise and 40 dBLnight for night-time noise.

The planning permission conditions for the new North Runway at Dublin Airport also included a requirement for a voluntary noise insulation scheme to be put in place for existing dwellings affected by the **Day Time** noise and the 65/night flight restrictions and also a condition for a voluntary purchase scheme for dwellings within a 69 dB LAeq 16 hours noise band.

We note that following the installation of nose insulation into housing by the DAA associated with the existing south runway, measurements of night noise by members of the St Margaret's, The Ward community have confirmed that even with this insulation the recommended guidelines set out by Fingal County Council in accordance with the May 2017 Pro PG guidelines cannot be achieved and therefore this insulation is ineffective in protecting residence environmental noise.

4.1 Noise and Previous Development Plans

Fingal County Council was formed in 1994 and was previously known as Dublin County Council. Previous to this the land planning and development plans for Fingal were covered by Dublin County Council and their published development plans.

Fingal County Council provided their first Development Plan for the years 1999-2004. Their second plan was for the years 2005-2011 and subsequent plans 2012-2017.

We specifically note that the Dublin County Council Development Plans did not provide any restrictions on development within the St Margaret's, The Ward community based on noise levels.

There were some restrictions on development within what were then termed "Red Approach Areas" which were located at the ends of the existing and proposed new Northern Runway. These red approach areas were considerably less in area than the inner noise zones of the 2011 – 2017 Development Plan and the newer 2017 – 2023 Development Plan.

The first "Airport Noise Zone" contour that was included on a Fingal Development Plan was indicated on the South Fingal Fringe map of the 1999-2004 plan. This contour represented a noise level of 57 db LAeq which was deemed to be equivalent to the original 35 NNI contour (Noise and Number Index). This contour covered a very large area of Fingal and included within it, existing and proposed lands zoned for residential purposes. There were no specific restrictions on development for lands located within this noise zone.

The first development plan that included an inner and outer noise zone was the Fingal 2005-2011 redevelopment plan. At policy DAPU of that development plan it states, "to strictly control in appropriate development and to require noise insulation where appropriate within the outer noise zone and to resist new provision for residential development and other noise sensitive uses within the inner noise zone, as shown on the development plan maps".

For the first time Fingal County Council recognised under the heading of "Noise " on page 44 of that plan that airport noise "can have a significant effect on the environment and on quality of life enjoyed by individuals and communities. There is a need to minimise the adverse impact of noise without placing unreasonable restrictions on development and to avoid future conflicts likely to lead to demand for restrictions on airport operations".

In light of this, the development plan proposed the following on page 45 of that plan.

"ST MARGARET'S AND OTHER RESIDENTIAL COMMUNITIES"

"Change is inevitable for the existing residential communities around the airport. Thus, it is necessary to work together with residents to achieve significant incremental change, an approach which could ultimately completely alter the settlements character.

Objective DA09 stated: “to develop a consultative board based on international best practices involving the existing communities, Fingal County Council, Aer Rianta (now DAA) and other appropriate stakeholders, to consult about the detailed resolution of the future of the communities in the area and to seek consensus about the nature of change”.

It is very clear from the above that Fingal County Council, for the first time recognised that noise affecting the local community of St. Margaret's / The Ward, was a significant issue and that to allow the expansions of Dublin Airport that there must be changes within the St. Margaret's / The Ward, community and that Fingal were willing to work with the community in that regard.

Despite this objective no work has been carried out by Fingal County Council or the DAA with the residents to “achieve significant incremental change, an approach which could ultimately, completely alter the settlement character”. Fingal County Council through their development plans have continued to support Dublin Airport Development into the St. Margaret's / The Ward community without proposing alternative mitigation measures to the community. The DAA are in breach of the planning conditions for the North Runway as indicated below.

Objective DA010 stated “to prepare a strategy for St Margaret's special policy area involving consultation between the existing community, Fingal County Council and the Dublin Airport Authority”.

It should be noted that the DAA obtained planning permission for the new Northern Runway within the time frame of this 2005 – 2011 Fingal Development Plan and that in order to protect the local communities from adverse health noise effects restrictions on operations were put in place to restrict night-time flights by an Board Pleanála as conditions of the grant of planning permission.

We note, however, that all consultations with the local communities, Fingal County Council and the DA in the past have been on the basis of the existing Northern Runway and the fact that restrictions were in place for the grant of planning for this runway . As can be appreciated any proposal to increase night- time flights above the current planning restrictions would have a detrimental effect on the St. Margaret's, The Ward, community as this would infringe on the health and safety of the community, particularly with respect to sleep deprivation. Sound insulation is not a solution to aircraft noise at night in the St. Margaret's, The Ward area, particularly in the summertime when most house occupants need to leave their windows open for cooling and proper ventilation of their houses.

If night-time flights are being proposed, then the DAA and Fingal County Council need to provide adequate mitigation measures for local community residents.

Variation No. 1 to the Fingal Development Plan 2017-2023 at Table 7.1, Zone A noise contour which has a noise level greater than or equal to 63 db LAeq /16 hr and/or greater than or equal to 55 db L night it is stated that "to resist new provision for residential development and other noise sensitive uses. All noise sensitive developments within this zone may be exposed to high levels of aircraft noise which may be harmful to health are otherwise unacceptable.

The provision of new noise sensitive developments will be restricted".

It obviously follows therefore that if night-time flights are allowed that all existing dwellings within this zone should be relocated to ensure that the health of the residents is maintained, and they are protected from this harmful noise by relocating all residents within this zone. There is a clear recognition from Fingal County Council in the variation that they are gravely concerned about local community health due to exposure to aircraft noise at the levels presented in Zone A. We in St. Margaret's, The Ward, contend that night-time noise will affect members of the community outside Zone A and should also include Zone B.

Despite the fact that the DAA have clearly indicated that they want night-time flights, they are ignoring the provisions for a Voluntary Purchase Scheme included in the current planning permission where flights are Restricted at night.

The DAA should provide the residents of St. Margaret's and the Ward located inside noise zones A & B with the following options should they require additional night-time flights.

(1) Voluntary Relocation Scheme.

The Thornton Hall site of 150 acres as indicated on the attached map, was purchased by the Government over 10 years ago for a proposed prison. This proposal has been abandoned. A new road and foul sewer was installed to service the lands. These lands being located adjacent to St. Margaret's, The Ward are ideal for the relocation of residents affected by the proposed night-time flights and harmful aircraft environmental noise. Housing of the exact type and site size can be constructed to match existing residents being relocated. Fingal County Council Development Plan already contains an objective RF54 that allows for the Consideration of Planning by a member of the family whose house has been acquired in the interest of the common good, whether compulsory or by agreement.

As noted above there are less than 150 houses located in the St. Margaret's, the Ward area of the Airport within noise zones A and B. Therefore, if night-time flights are proposed these affected houses can easily and economically be relocated to mitigate against harmful noise exposure.

We note that DAA state "as per planning permission and as agreed with Fingal County Council the DAA is providing 8 hectares (20 acres) of compensatory habitat at Thornton Hall, North County Dublin to offset its necessary removal of hedgerows and trees". What about the Human Population being affected? Where are the mitigation measures for our community

members? We note that this proposal allows DAA to hold onto the housing units within the area whilst the residents are relocated. This is a major economic advantage for DAA.

(2) Voluntary Purchase Scheme.

This scheme is already operational and DAA have offered homeowners market value plus 30% as a price for Voluntary Purchase. However, no consensus on purchase price has been reached. The voluntary relocation scheme as noted above solves this problem as the cost to relocate can be controlled and accounted for by DAA.

Again as DAA will hold onto the housing units within the area whilst the residents are relocated, this is a major economic advantage for DAA.

(3) House Insulation Scheme.

If a homeowner does not want to move from their house and wish to stay, then a comprehensive insulation scheme must be provided. Due to the fact that their home will be exposed to night-time flights a climate control system must also be installed and provision for maintenance and cost provided.

All of the above should be made available to residents of St. Margaret's and The Ward and the choice of which Scheme left to the homeowner.

We note at Appendix 1 table A.2 of the current development plan, Fingal County Council list a number of rural villages which Fingal contend can provide serviced sites for eligible rural community members. How are noise affected families expected to purchase such sites? It is suggested that they purchase a site and leave their current homes. This is clearly unacceptable given that Fingal County Council recognised as far back in 2005 that members of the community must move due to noise from the Airport, they must insist that an alternative location is found.

We note that the noise insulation scheme imposed is for an active day time Airport with very limited night-time flights. A noise insulation scheme without climate control and the cost of running and monitoring such systems is not a practical method to protect the health of occupants for continuous night-time flights. Also, we note that whilst the DAA have held discussion with dwelling owners regarding the voluntary Purchase Scheme, no suitable relocation site within the St. Margaret's, The Ward area has been proposed. There are no available sites for sale within the St. Margaret's, The Ward area and the DAA have not purchased lands that would be appropriate for relocation of these residents within the St. Margaret's area. Why is it that the DAA have not arranged to provide a relocation site for these Residents as part of the Airport Expansion Scheme?

We note that there is no LAP for Coolquay which is within the St. Margaret's, The Ward Parish. This is despite the fact that this proposed rural village has been included in the first Fingal Development Plan of 1999 – 2004. This is 20 years ago, and nothing has been done by Fingal County Council. Planning has not been granted for the recently adopted Rivermeade Local Area Plan and currently no serviced sites are available.

How are members of the community to obtain sites in these areas if there is no realistic purchase scheme for community residents affected by noise. The intention is clear by the DAA, leave the community members in situ and over time due to health issues they will be forced to move with their dwellings being worthless due to aircraft noise. This is unacceptable and will not be tolerated by the local community

5.0 What are the issues?

DAA have launched a National PR exercise stating that the night-time restrictions imposed by the current planning permission for the Northern Runway are too onerous and will prevent the expansion of the Airport that is in the national interest of Ireland INC.

However, Dublin Airport is already a cash cow for Ireland Inc. In 2015 the DAA paid over €40 million to the state and €125 million in total in the four years from 2015 after it agreed to pay 30 % of its profits each year with the Government. The business case to expand activities at Dublin Airport at the expense of the residents of St. Margaret's is therefore fundamentally flawed and is an act of pure greed. Expansion can be achieved whilst maintaining the health of residents of St. Margaret's , The Ward area by relocation.

The DAA Published a 626-page document titled "Capital Investment Programme 2020 +" which shows detailed proposals for expansion of facilities at Dublin Airport to a cost of over 1 billion euro. However, not one cent has been set aside for mitigation measures for the affected Residents of St. Margaret's and The Ward.

Instead the DAA are looking to Fingal County Council as a competent authority to enforce European Directive 598/2014 for noise regulation at Dublin Airport without any consideration of protection or mitigation measures to the people of St. Margaret's, The Ward.

As previously noted, planning permission was granted for the new Northern Runway with restrictions on night flights. Conditions also included a noise insulation scheme and a voluntary purchase scheme. Alarmingly the Aircraft Noise (Dublin Airport) Regulation Act 2019 calls on the expansion of the noise insulation scheme. But there is no mention of measures associated with a voluntary purchase of dwellings scheme despite the fact that the Airport will be using its legislation to apply for additional night flights. As noted above noise insulation is not a satisfactory measure to protect human health by exposure to noise at night. For example, last Summer was extremely warm and everyone had to provide open windows to remain cool. Noise insulation is not a solution at night. To pretend that noise insulation will solve health

problems associated with flights is ludicrous especially where people are located adjacent to the airport. The noise insulation specified in the current permission is for noise levels of 60 decibels LAeq 16 hours which is a local day time noise. The World Health Organisation (WHO) is strongly recommending a limit of 40 decibels Lnight as the maximum consistent noise at night which is hugely below the figure for daytime insulation. In fact, the WHO recommended that the Sound Exposure Limit of 40 decibels be used to protect people from severe sleep deprivation which is a major cause of severe health problems.

As noted above noise testing in housing which have been insulated by DAA indicate that the noise levels at night are contrary to Fingal's stated guidelines.

The cost to relocate members of St. Margaret's / The Ward community is well within the Business Plan for Dublin Airport and clears the way for airport expansion.

It is estimated that there are approximately 150 households in The St. Margaret's, The Ward area located in noise Zone A and Zone B which will be affected by night- time noise.

6.0 Dublin Airport Noise Action Plan 2019 to 2023.

Sound is measured on a logarithmic decibel (dB) scale. For example, every increase of ten dB on the decibel scale is equal to a tenfold increase in Sound Pressure Level. Near silence is expressed as 0dB but a sound measurement at 10 dB is actually ten times louder. If a sound is 20dB, that is 100 times louder than near silence.

We confirm that under SI 140 2006 Fingal County Council put on public display a draft Noise Action Plan for 2019 to 2023 and which had 589 submissions from the general public due to their concerns regarding the content of this plan.

SI 140 2006 was implemented by Ireland to conform to the EU directive 2002/49/EC whose principal objective is to AVOID, PREVENT, and REDUCE on a prioritised basis the harmful effects including annoyance due to exposure to environmental noise. As per the directive the noise action plan shall set out the proposed measures to AVOID, PREVENT and REDUCE noise. It is specified at Annex IV of the directive that "difference maps in which the existing situation is compared with various possible situations" need to be presented to the citizens of Ireland to make them aware of the current situation and proposed future variations. Of particular note is that Dublin Airport Noise Contour maps were produced at planning submission stage by DAA to show the combined effect of the existing runway and proposed new Northern Runway. Also, over the last 2 years DAA have revised these maps and put them up on display. Therefore, the proposals are READILY available. When Ireland introduced the Environmental noise regulations they also included as "A MINIMUM REQUIREMENT FOR STRATEGIC NOISE MAPPING" that possible future situations be demonstrated and shown to the citizens of Ireland. (SI 140 2006)

At Fingal County Councils December meeting of 2018, a Council Official "admitted that while drafting the plan was compulsory there is not very much compulsory about the actions". This is an alarming admission. In other words, no matter what the plan shows up the "actions to AVOID, PREVENT and REDUCE noise is not compulsory" !!! Also, the Council Official said that many of the "submissions" related to the new runway which was outside the scope of the plan. He said the plan cannot look at the future and deals with the situation as it is now." We refer to the above from the Directive and Irish regulations which clearly indicate that the PLAN MUST take into account future situations and therefore, the plan does not conform to Irish Legislation and the European Directive.

Notwithstanding the above the Fingal Noise Action Plan for Dublin Airport at Tables 7 and 8 indicate the progression of night-time noise at Dublin Airport. The increase in population affected is a massive 6200% and dwellings from 2006 to 2016 with THE CURRENT RUNWAY ALONE and WITHOUT the new Northern Runway. But of course, the Council Official points out as far as Fingal County Council are concerned "there is nothing very much compulsory about the actions."

This clearly shows that Fingal County Council are not protecting the residents of St. Margaret's, The Ward.

7.0 Proposed Roads.

The Land use zone of the majority of lands in The St. Margaret's, The Ward area located to the West of the Airport LAP lands are green belt or rural agricultural.

It is proposed that the main road access to the Airport LAP lands is via a new Airport Western Access Road from for the existing N2/M2 which cuts through the middle of an existing farming area in St. Margaret's.

A further new road running from North to South is also proposed to run through agricultural lands in St. Margaret's and links with the proposed Swords ring road which links into the M1 Motorway North of Swords.

These proposed roads are significant and shall split St. Margaret's, The Ward into pieces.

Fingal County Council cannot provide certainty to The St. Margaret's, The Ward community as to the exact location of these roads and the effects they will have on the local community.

Fingal County Council have not provided any mitigation measures regarding the effect of these roads on the community which will also add to the significant noise issues in the community of St. Margaret's, The Ward. Objective EA3 states that the external road network shall be developed on a phased and planned basis. What is the phased and planned basis? Why is there no mention of any mitigation for the local community which is green belt.

The planning of these roads are as if the areas which they are being brought through are development lands. They are not and until such time as this is acknowledged and proper land use planning for St. Margaret's, The Ward area is proposed, these proposals cannot proceed with as they will be detrimental to the Health and Safety of all members of the community.

8.0 Strategy for St. Margaret's Special Policy Area.

A strategy for the central village of St. Margaret's, The Ward, is contained in appendix 1 of the local area plan for Dublin Airport. Whilst the strategy for this central historic part of the village of St. Margaret's

is welcomed, it does not account for the mitigation measures associated with noise from the Airport in the greater St. Margaret's, The Ward community.

There is a contradiction here in that residential development is restricted in St. Margaret's, The Ward due to proximity of the airport and related noise issues but facilitates for the community are proposed to be enhanced in the village of St. Margaret's.

If night-time flights are proposed the mitigation of relocation to the likes of Thornton Hall must be provided. Relocated community members will benefit from the proposed connectivity to the St. Margaret's GAA and community grounds and to the proposed enhancements with the St. Margaret's Policy Area.

We note that connecting footpaths and cycle paths must be included as an objective CF6 "To provide footpaths and cycle paths between Rivermeade Estate to the St. Margaret's GAA and community complex and to the St. Margaret's Special Policy Area!" This is to ensure safe connectivity within the community.

9.0 Proposed Expert Group Study

As our Local Authority responsible for Land use Planning, we St. Margaret's, The Ward community call on them to set up an expert group to review the future impact of Dublin Airport development/ expansion on our community and provide a report with recommendations of proposed mitigation measures for our community as set out above.

Planning register reference number F04A/1755, An Bord Pleanála reference number PL06F.217429 granting planning permission of the Northern Runway at Dublin Airport is quite clear at condition 28 that "A community liaison group shall be established involving representation of the Saint Margaret's community, Fingal County Council, and the Dublin Airport Authority. The composition of the committee and any valuation thereof shall be subject to the prior agreement of the planning authority. The committee shall facilitate consultation with the existing community in accordance with the policies and objectives of the Fingal Development Plan 2005 – 2011 in relation to St. Margaret's."

Under the heading of "St. Margaret's and other residential communities" the development plan state "change is inevitable for the existing residential communities around the airport. Thus it is necessary to work together with residents to achieve significant incremental change, an approach which could ultimately completely alter the settlement character". Objective DA09 states "To develop a consultative board based on international best practices involving the existing communities, Fingal County Council, Aer Rianta and other appropriate stakeholders, to consult about the detailed resolution of the future of the communities in the area and to seek consensus about the nature of change".

The planning permission for the North Runway was granted in 2007, 15 years ago. The designation for housing at Coolquay and Rivermeade to serve the housing needs of the St. Margaret's / The Ward communities were provided in the Dublin County Council Development Plan as far back as the 1990's. In each of the subsequent development plans it was stated that a local area plan for Coolquay and Rivermeade would be carried out within the term of each successive development plan, in order to facilitate housing for the St. Margaret's / The Ward community. To date, over 30 years later, Fingal County Council have still not carried out or published an LAP for Coolquay.

An LAP was adapted by Fingal County Council for Rivermeade in May 2018, 4 years ago. Since then planning permission was submitted for additional housing and badly needed local services such as a shop, creche, local offices etc. on a portion of the LAP lands. Under the Lap at Section 14.2.2 it states that "Fingal County Council will also facilitate the upgrade of the Toberburr Road".

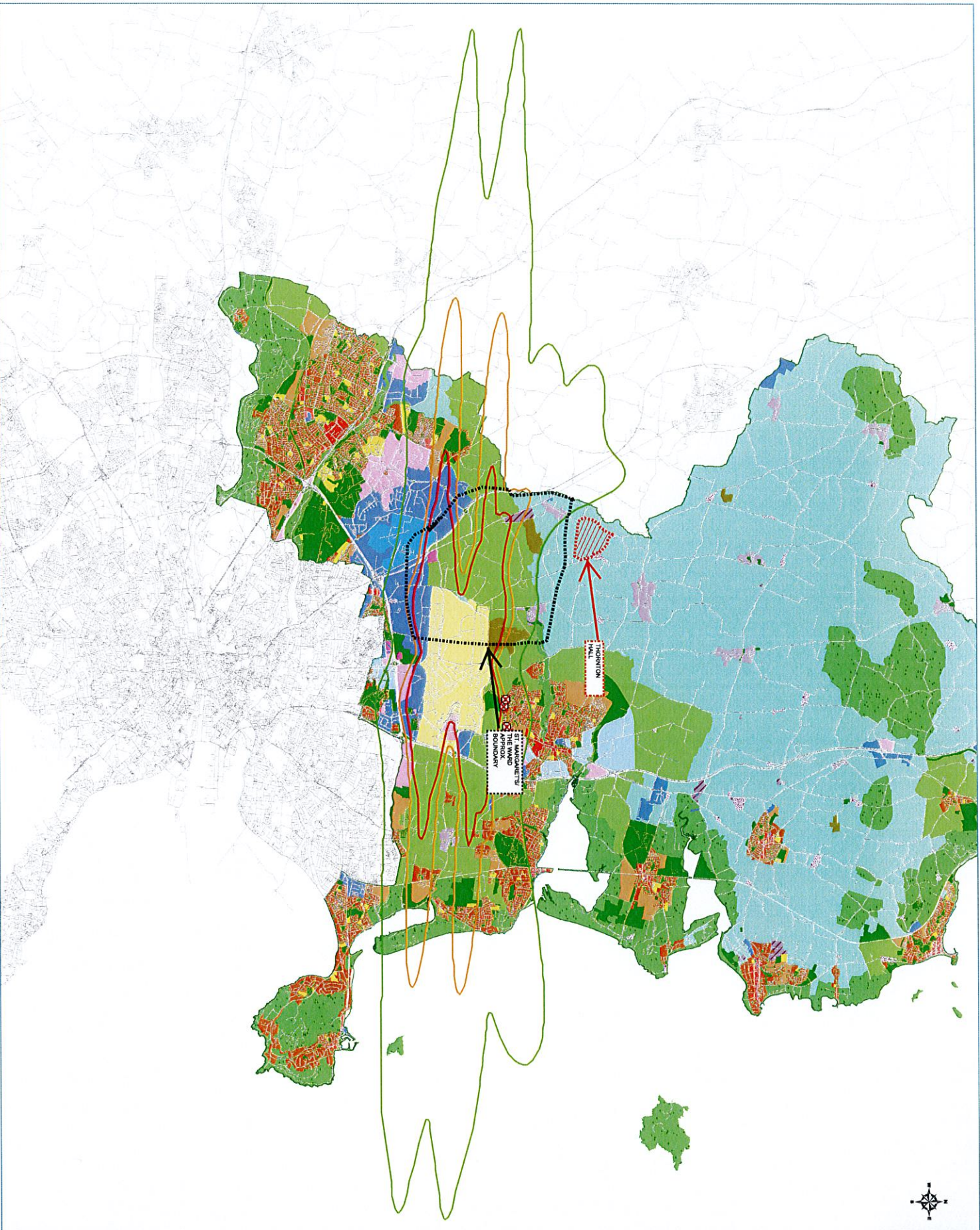
The planning application submitted also included the provision of a new bridge across the Ward River and the replacement of the existing polluting wastewater treatment plant with a pumping station which would serve not only the existing 175 houses at Rivermeade but also the proposed new housing. Fingal County Council granted Planning Permission for Phase 1 of that application. However An Bord Pleanála subsequently refused permission for this phase of development Reg Ref 19A/0638, ABP-308140-20, in December 2020.

At Section 7.5.4 of An Bord Pleanála Inspectors Report he notes that "Notwithstanding what LAP policy states regarding upgrading of roads there is a risk of permitting a significant level of housing development at this location without a clear strategy or guarantee that the necessary road upgrades would take place in a timely manner. This is not necessarily the fault of the applicant / first party applicants and is a weakness of the LAP. Notwithstanding such, I consider that the proposal would be premature pending upgrade of the public road network in the vicinity and there is a lack of clarity regarding how such is to be implemented in tandem with the provision of housing proposal in this application."

To be clear, Fingal gave a commitment to upgrade the Toberburr Road and the developer cannot upgrade the road as he does not have ownership of the lands to do so.

The local housing therefore cannot be delivered until Fingal carry out the road upgrade, but 30 years on they have not and have informed the St. Margaret's / The Ward community that they have no plans in place to carry out these upgrades.

At condition 30 and 31 of An Bord Pleanála decision to grant planning permission for the new North Runway it is noted that the DAA were to pay Fingal County Council financial contributions in respect of public infrastructure and facilities benefitting development in the area of the Planning Authority. At condition 39 of the Fingal Grant of Permission this figure is stated as €21,542,248.00 (updated at date of commencement of development). The cost to upgrade the Toberburr Road is in the order of €2m euro which is well within the resources of Fingal County Council and the fact that the St. Margaret's / The Ward area are required to accommodate Dublin Airport by locating housing away from the North Runway at Rivermeade and Coolquay.



Noise Zones



Zone A
≥ 63 dB LAeq,
16hr and/or ≥ 55 dB Lnight



Zone B
≥ 54 dB LAeq, 16hr and < 63 dB LAeq,
16hr and ≥ 55 dB Lnight



Zone C
≥ 54 dB LAeq, 16hr and < 63 dB LAeq,
16hr and < 48 dB Lnight and < 55 dB Lnight



Local Objective No.54 Removed

Fig 1



/ Your Fingal

**Fingal Development
Plan 2005 - 2011 /**

Written Statement



Fingal County Council
Comhairle Contae Fhine Gall

Policy DAP14

To ensure that every development proposal in the environs of the Airport takes into account the impact on water quality and flooding of local streams. This should form part of the Environmental Impact Statement where an EIA is required.

GREENBELT

A predominantly greenbelt role is envisaged for the majority of the area. This will ensure that it continues its role of separating urban areas, builds positively on its under-used potential for recreation, and avoids development that could create conflicts with airport activity in the future. Development relating specifically to agricultural and open recreation use will be permitted and encouraged, with recreation promoted in the most accessible areas. Improvement of existing and zoned non-agricultural and recreational uses will be permitted where it can be demonstrated that these works will not result in material intensification of land use.

Policy DAP15

To continue to foster agricultural uses and to promote recreational and leisure activities within this area for the benefit of the community at large.

ST. MARGARET'S AND OTHER RESIDENTIAL COMMUNITIES

Change is inevitable for the existing residential communities around the airport. Thus it is necessary to work together with residents to achieve significant incremental change, an approach which could ultimately completely alter the settlements character.

Policy DAP16

To restrict housing development in order to minimise the potential for future conflict between airport operations and environmental conditions for residents.

Policy DAP17

To permit improvement and extension to existing properties in the area where it can be demonstrated that such works do not represent significant intensification of development, and that appropriate consideration of potential noise impacts are incorporated within the proposals.

Objective DA09

To develop a consultative board based on international best practices involving the existing communities, Fingal County Council, Aer Rianta and other appropriate stakeholders, to consult about the detailed resolution of the future of the communities in the area and to seek consensus about the nature of change.

Objective DA010

To prepare a strategy for 'St. Margaret's Special Policy Area' involving consultation between the existing community, Fingal County Council and the Dublin Airport Authority.

THE 'M50 BELT'

Apart from limited consolidation of existing zonings to cater for warehousing and logistics uses only, the land between the DAA and the M50 cannot be released for further development until the capacity of the whole transport system in this locality has been substantially augmented. As part of such augmentation the Council strongly supports the provision of a Metro link from the City Centre to the Airport and on to Swords. Existing road capacity is already a major concern along this section of the strategic network, and additional loading should be avoided unless there is a compelling need. In the longer term, when the transport system has been substantially augmented, commercial development around a public transport node together with consolidation of existing zonings can be envisaged. The case should be reviewed once the Metro/rail alignments are definitively selected and funded.

Note PZ & PA.

Delivering Dublin airport's North Runway – the key to Ireland's global connectivity

20 February 2018

Delivery of Dublin airport's North Runway will enable a 30% increase in connectivity, which will support an extra 31,200 jobs and €2.2bn of economic activity, writes John Heffernan

airport and for Ireland

Dublin airport plays a pivotal role in the Irish economy, supporting 117,300 jobs and contributing €8.3 billion in economic value in 2016 alone, representing 3.1 per cent of Ireland's total GDP. As an island nation competing in a globalised marketplace, our connectivity with the rest of the world is critical to Ireland's economic wellbeing, and Dublin airport is a driving force in the growth of tourism, trade and foreign direct investment into the country.

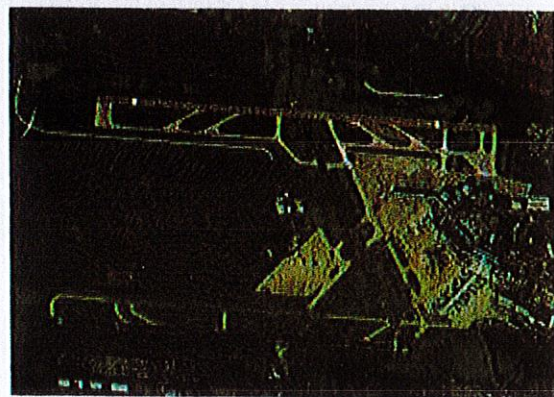
Facilitating future growth for Dublin



Business as usual during the construction of Dublin airport's north runway

Dublin airport facilitates 4,500 flights per week by 47 airlines to more than 180 destinations in more than 40 countries on four continents. Traffic grew by almost 1.7 million in the last year alone, resulting in a record-breaking 29.6 million passengers passing through the airport in 2017.

The runway is now full for most of the operational day and extra capacity is urgently needed. The delivery of North Runway will enable a 30 per cent increase in connectivity which will support an extra 31,200 jobs and a further €2.2 billion of economic activity.



(<http://www.engineersjournal.ie/wp-content/uploads/2018/02/a-daa1.jpg>)

North Runway footprint

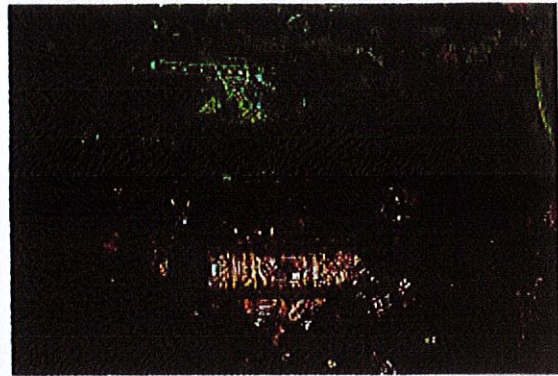
Years of careful planning

North Runway has featured in successive Local Area and County Development Plans since the 1970s. Through excellent foresight and careful planning, the land for this development was safeguarded more than 40 years ago, and approaches have been kept largely clear of development.

This means that the number of impacted residents is far lower than at other European capital city airports. For example, using 2014 data, there are fewer than 500 houses inside the 60dbLday contour at Dublin airport compared with more than 45,000 at Heathrow.

We are nevertheless very mindful of our neighbours. As part of the north runway's planning permission, a residential house insulation scheme, a voluntary house purchase scheme and an insulation scheme for eligible schools have been put in place to mitigate against the impact of Dublin airport's operations on local communities.

The eligibility of a particular household is predicated on the extent of aircraft noise to which it is exposed. Thresholds, expressed as noise contours measured in decibels, were determined at the time of the grant of planning and are consistent with those used at airports across the world - 63dB being commonly used as a threshold for house insulation, with a 60dB limit for schools, and 69dB for the voluntary house purchase scheme.



(<http://www.engineersjournal.ie/wp-content/uploads/2018/02/a-daa7.jpg>)

Dublin, above, and Heathrow, below

Value for money

The projected cost of €320 million for North Runway represents real value for money, particularly when compared with other similar projects in the UK which do not benefit from full development within their own landbanks.

Heathrow, for example, is currently at the pre-planning phase for a 3,500m third runway. At an estimated total cost of £16 billion, this project also includes terminal construction, road, rail and other infrastructure development.

On a like-for-like comparison, the runway and ancillary systems account for €8 billion, while a similar suite of works is being delivered for four per cent of that cost at Dublin.

The project

North Runway will be located 1,690m to the north and parallel to the existing main 10/28 runway. It will be capable of handling all aircraft types up to Code F aircraft. To meet this operational brief, the runway will be 3,110m long and 75m wide with a parallel taxiway located to the south connected into the existing taxiway network.

North Runway will be equipped with Category III B instrument landing and airfield ground lighting systems which will facilitate automatic landing in almost all low visibility conditions. In addition to the runway and

The reuse of excavated earth on site and environmental recycling of site byproducts was also a key feature, with initiatives such as wood from site clearance being donated to local communities and woodchip used for off-site power generation.

As per planning permission and as agreed with Fingal County Council the Dublin Airport Authority (DAA) is providing eight hectares (20 acres) of compensatory habitat at Thornton Hall in north county Dublin to offset the necessary removal of hedgerows and trees.

The design of this habitat will reflect as far as possible that of the original airport site and include a range of habitats to compensate for the necessary loss at North Runway's location.

More than 400 staff were engaged in Construction Package 1, working more than 120,000 hours with out-of-hours activity accounting for only six days. Safety and security is a key focus at the DAA and it is worth noting that there were no lost-time incidents by either the DAA or the main contractor, Roadbridge.

Construction Package 2

The second package covers the detailed design, construction, testing, commissioning and completion of the 3,110m runway, taxiways and associated infrastructure, all of which will be based on a 30-year design life.

It includes the isolation, demolition and removal of all redundant services within the site, including the removal of the airport's original 11/29 runway and relocation of the Engine Test Site, ensuring optimisation of material re-use at all times.

The package also includes surface water and land drainage and treatments; all electrical infrastructure, instrument landing systems and navigational aid infrastructure; airport fencing, gates, perimeter road and signage, and ancillary works.

The tendering process for this package is well advanced, and following appointment of the successful bidder, construction is scheduled to commence towards the end of 2018.

Operation of the north runway

North Runway is scheduled to be commissioned in 2021. When fully operational, together with the existing main runway, it will operate in segregated mode most of the time, i.e. one runway for arrivals, and the other for departures.

There will be occasions during peak hours when the runways will need to operate in mixed mode, that is, both runways used simultaneously for arrivals and for departures.



(<http://www.engineersjournal.ie/wp-content/uploads/2018/02/adaa6.jpg>)

Laying of services ducting