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To: [aircraftnoiseconsultation](#)
Subject: Submission on noise consultation for Dublin airport
Date: 28 February 2022 15:41:04

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To whom it concerns,

I wish to have the following submission taken into consideration with regards to the night time operation of the Dublin Airport runway system.

The establishment of the Aircraft Noise Competent Authority(ANCA) to oversee the operation of Dublin Airport with regard to noise issues is a welcome development.

Regrettably Ireland has 'dragged its heels' for decades with regard to dealing with transport related noise pollution and has failed to deal effectively with this important issue as regards to the many negative impacts on human health and the lived environment.

The Dublin Airport Authority (DAA) has, in my opinion, systematically failed to adequately tackle the noise pollution generated from its activities. The adverse impacts of aircraft generated noise pollution have been increasingly better understood since the early 1980s. Despite the wealth of research, medical evidence, best practice and noise regulation in other jurisdictions, we are now only in 2022 beginning to take this matter seriously. The low number and bad positioning of the existing noise monitoring noise stations for the airport flight operations' indicates to me that the DAA has a "Do minimum" approach to dealing with aircraft noise. Add to that that circa only 300 houses have been able to avail of grants for noise abatement measures to date suggests that the DAA has made it very difficult for individuals/communities (through lack of noise evidence - due to lack of widespread monitoring etc.) to get a reasonable response to the noise issue.

The World Health Organisation(WHO) Europe, Environmental Noise Guidelines 2018 state quite clearly that their report/guidelines "for the European Region provide strong evidence that noise is one of the top environmental hazards to both physical and mental health and well-being in the European Region."

The foregoing guidelines state that "Based on the evidence of the adverse effects of aircraft noise on sleep disturbance, the GDG defined a guideline exposure level of **40.0 dB Lnight**. It should be stressed that **this recommendation for average aircraft noise levels at night far exceeds the benchmark of 3%HSD defined as relevant risk increase**, but since no reliable acoustic data below this level were available, the GDG decided not to lower the guideline exposure level further, as an extrapolation of the exposure-response relationship to achieve these values would have been unavoidable. As the evidence was rated moderate quality, the GDG made the recommendation strong."

The Lnight time is defined as the hours between 23.00hours to 07.00hours.

Sleep disturbance is likely to occur at night time at noise levels at above 40dB.

The DAA wishes to overturn Condition 3(D) for the permission for Runway 10L -28R and to reduce the restrictions on night time use. This despite the evidence available that this would have a harmful effect on the individuals living / will live under its flight paths. Children will be impacted to a greater extent due to their longer sleep periods.

I suggest that the existing condition(3(d)) as originally stipulated be retained and that the amendment as applied for be rejected.

Additionally, I strongly suggest that the establishment of a noise monitoring regime of aircraft noise at Dublin airport be given to an independent body ,which is not aligned to the DAA.

Such monitoring stations should be:

- (1) located on existing residential areas underneath the flight paths for all runway operations associated with the airport.**
- (2) located on currently un developed lands underneath flight paths which have been/ will be identified for possible future development for residential, educational or medical use purposes or mix thereof. This will assist the identification of high noise areas in which future development of the type mentioned above should not be permitted.**

The operators of the monitoring stations to report directly to ANCA , with the information made available collaterally to the DAA.

Tolerance / action levels for Lnight

The action level of **55dB for Lnight (acknowledged as the level harm will occur) is too high.**

The WHO 2018 report states that disturbance occurs at Lnight levels of 40dB. Allowing a night noise level of 55dB is going to impose an unacceptable burden on the community who will experience those noise levels on a nightly basis.

A 55dB night action level will do harm.

It is not reasonable to expect communities to live with high night time noise over an extended period of years so that a gradual transition can be effected by the DAA to achieve safe noise levels. If a health hazard is identified then it must be dealt with forthwith. Imagine asking an employee to work in an unsafe work situation where noise levels are injurious....there would no tolerance of such a scenario.

Base year for noise measurements 2019

Disappointingly your base year chosen is 2019, the busiest year for aircraft movements on record. That of course allows the measurements of noise to start at the **HIGHEST LEVELS**, which merely serves to strengthen the community perception that the deck is stacked against them.

A more reasonable approach would be to take an average of the past six years of aircraft movements / noise levels records (sparse as they are!) and utilise that number.

Noise contour levels

In view of the low number of noise monitoring stations serving Dublin airport it is suggested that **a fresh remapping of the noise contour maps for the airport be undertaken** to reflect the 24 hour airport operations. Particular attention should be paid to night time impacts and that an either the present level of 63dB average or an Lnight action level of 45 dB be used for eligibility for an insulation grant. As mentioned previously a much greater number of stations to be set up under the flight paths in appropriate residential locations across the county. It is my opinion that such an expansion of the noise monitoring stations will lead to a revision of the noise mapping contours. That is likely to indicate that there is a far higher level of noise insulation grant eligibility than heretofore admitted by the DAA.

Noise budget

I live in south Blanchardstown and am under the flight path for a selection of early morning flights departing the airport from about 06.00hours onwards. I am awakened by the aircraft 3 to 4 mornings a week. Once I hear the first aircraft I am awake, regardless of how many aircraft overfly after that!.

A budget of decibels to use up before noise disturbance is considered to have taken place does not make sense nor is it representative of what actually takes place in the real world. I therefore do not recommend the use of a dB budget as a reasonable method of determining night time disturbance.

Summary

1. Retain the existing condition 3(d) - 23.00-07.00 hours restriction on night flights - with regard to the new north runway permission.
2. Greatly expand and appropriately place noise monitoring stations.
3. Independent body from the DAA to be responsible for noise monitoring.
4. The setting of a Lnight disturbance level of 55dB is unsafe and will lead to bad health outcomes for residents underlying noise contours where such a high Lnight level standard is applied.
5. Do not adopt noise / decibal based budget as it is inappropriate for measuring sleep disturbance.
6. Use of 2019 base year for aircraft movements and noise levels heavily skewed in favour of the DAA and disadvantages the community stakeholders with regard to establishing reasonable noise mitigation measures / timetables.

Yours faithfully
Charlie Kurtz
Luttrellstown View
Dublin 15

3(d).
Runway 10L
-
28R shall not be used for take
-
off or landing between 2300 hours and
0700 hours
Runway 10L
-
28R shall not be used for take
-dB average day or Lnight of 45
off or landing between 2300 hours and
0700 hours
except in cases of safety, maintenance considerations, exceptional air traffic
conditions, adverse weather, technical faults in air
traffic control systems or

declared emergencies at other

Overview of the Proposed Application

The proposed development proposes that a Relevant Action be taken pursuant to Section 34C(1)(a) so as:

1. To amend condition no. 3(d) of the North Runway Planning Permission

Condition 3(d) and
the exceptions at the end of Condition 3
state the following:

3(d).

Runway 10L

-
28R shall not be used for take

-
off or landing between 2300 hours and
0700 hours

except in cases of safety, maintenance considerations, exceptional air traffic
conditions, adverse weather, technical faults in air
traffic control systems or
declared emergencies at other airports.

the above condition with the following:

Permission is being sought to amend condition

3(d)

so that it reads:

'Runway 10L

-
28R shall not be used for take

-
off or landing between 0000
hours and 0559

hours except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports or where Runway 10L

-

28R length is required for a specific aircraft type.'

quota of 7990 between the hours of 2330hrs and 0600hrs.

2.

To replace condition no. 5 of the North Runway Planning Permission which provides as follows:

5.

On completion of construction of the runway hereby permitted, the average number of night time aircraft movements at the airport shall not exceed 65/night (between 2300 hours and 0700 hours) when measured over the 92 day modelling period as set out in the reply to the further information request received by An Bord Pleanála on the 5th day of March, 2007.

Permission is being sought to replace

C

condition

5

with the following:

A noise quota system is proposed for night time noise at the airport. The airport shall be subject to an annual noise quota of 7990 between the hours of 2330hrs and 0600hrs

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