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ABP— 314485-22

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# SEO

## Observation

3/10/22

Tippy Toes Playschool

No new issues raised

FD-302 (Rev. 11-27-70)

EO

14/10/22.

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**To**

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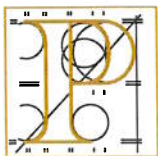
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An  
Bord  
Pleanála

## Planning Appeal Online Observation

### Online Reference

NPA-OBS-001383

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### Online Observation Details

Contact Name  
Rebecca Hemeryck

Lodgement Date  
03/10/2022 22:53:10

Case Number / Description  
314485

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### Payment Details

Payment Method  
Online Payment

Cardholder Name  
Rebecca Hemeryck

Payment Amount  
€50.00

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### Processing Section

S.131 Consideration Required

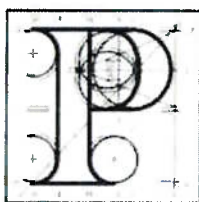
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Yes — P.T.O.

☐

N/A — Invalid

Signed



An  
Bord  
Pleanála

## Observation on a Planning Appeal: Form.

### Your details

#### 1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

Your full details:

(a) Name

Click or tap here to enter text.

TIPPY TOES Playschool

(b) Address

Click or tap here to enter text.

COOLQUAY, THE WARD, CO DUBLIN  
D11 YH66

### Agent's details

#### 2. Agent's details

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Not applicable

(b) Agent's address

Click or tap here to enter text.

## Postal address for letters

3. During the appeal process we will post information and items to you **or** to your agent. For this observation, who should we write to? (Please tick ✓ one box only.)

**You (the observer) at the address in Part 1**

☒

**The agent at the address in Part 2**

☐

## Details about the proposed development

4. Please provide details about the appeal you wish to make an observation on. If you want, you can include a copy of the planning authority's decision as the observation details.

**(a) Planning authority**

(for example: Ballytown City Council)

Fingal County Council

**(b) An Bord Pleanála appeal case number (if available)**

(for example: ABP-300000-19)

PL06F.314485

**(c) Planning authority register reference number**

(for example: 18/0123)

F20A/0668

**(d) Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Dublin Airport, Co Dublin

## Observation details

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

We support the current appeals lodged with An Bord Pleanála and wish to add the following comments listed below.

Tippy Toes Playschool.  
Coolquay, The Ward,  
Co. Dublin.

Proprietor:- Rebecca Hemeryck  
Phone:- 086 816 7657.



3<sup>rd</sup> October 2022

**RE:- ABP Case reference: PL06F.314485**

**314485: Dublin Airport, Co. Dublin (F20A/0668) - Fingal County Council**

**Description:-** A proposed development comprising the taking of a 'relevant action' only within the meaning of Section 34C of the Planning and Development Act 2000, as amended, which relates to the night-time use of the runway system at Dublin Airport.

Dear Sir/ Madam,

I would wish to make an observation to the above case. I run (own & manage) a Playschool and After school service attached to my home at Coolquay, The Ward, Co.Dublin (Eircode D11 YH66).

The DAA public consultations for the North Runway showed the noise contours and flight paths did not impact on my playschool/ afterschool service. On the 24<sup>th</sup> August 2022, like other members of our community we realised that with the commencing of flights from the North Runway, the DAA had blatantly lied to us.


One of the flight paths currently being used is directly overhead our Play/ Afterschool. As a rural environment Playschool we spend a lot of time in our outdoor play area, and when indoors we have the windows open for fresh air and to provide a healthy environment. The noise of the aircraft passing overhead is disruptive, a nuisance and impacts on the children.

We have made previous submissions to the DAA, they know we are here but have not engaged with us either prior to the runway operations commencing, or afterwards. I can't believe that such a government funded organisation could have such a flagrant disregard for children's well being, I'm utterly disgusted with the DAA.

We have commissioned a report on behalf of Tippy Toes Play/ After school and is attached for your information. Please listen to our concerns and bring the DAA to task and to abide by their planning permission and corresponding flight paths.

If you have any queries, please do not hesitate to contact me.

Yours sincerely,

  
**Rebecca Hemeryck**

TippyToes Playschool. 086 816 7657.

Tippy Toes Playschool.  
Coolquay, The Ward,  
Co. Dublin.

Proprietor:- Rebecca Hemeryck  
Phone:- 086 816 7657.



**Tippy Toes Playschool**  
Coolquay, The Ward, Co. Dublin.

Photograph of an aircraft flying  
directly overhead our  
playschool and visible through  
the velux rooflight.



Tippy Toes Playschool and Afterschool  
Coolquay  
The Ward  
Dublin

September 29<sup>th</sup> 2022

Dear Rebecca,

**Re: North Runway Noise Impacts**

Enclosed please find a technical note on the likely effect a change of operations at Dublin Airport will have on the noise environment at your premises. The change in operations will arise from the recent decision by Fingal County Council to grant permission to replace the 2007 operating restrictions at Dublin Airport with a new approach to noise control.

The objective of this study was to determine the potential impact the revised operations will have on your premises. While the change in operations specifically relates to airport operations at night, the effect on aircraft movements will not be confined to the night period, as for example an aircraft that becomes able to arrive at nights may then depart during the following day. Further, the flight paths are also proposed to change from those assessed in 2007. As such, this study attempts to:

- i. quantify the current situation at you premises,
- ii. compare the actual noise levels to those predicted prior to the opening of the North Runway
- iii. After establishing an accurate baseline scenario, estimate the likely noise impact at your premises.

However, as presented in this report, it is not possible to draw any robust conclusions on what might occur, because it is evident that all noise models assessing the impact of operations at Dublin airport are entirely inaccurate.

I have no confidence in the veracity of the noise impact assessments performed and reported in the Environmental Impact Assessment Report (EIAR) prepared for DAA in September 2021. As this technical note demonstrates, a fundamental error has occurred in the assessment of noise



impacts for operations of the North Runway (as it is currently operating). Critically, this means, that any conclusions based on these assessments are not supported by any accurate modelling.

These errors are immediately evident upon a consideration of the current noise environment at your premises. Initial predictions contained in the EIAR indicated that noise levels would be less than 54dB  $L_{Aeq,16hrs}$ . However, spot-monitoring of the actual scenario on-site reveals that noise levels at your premises are likely to be in excess of 60dB  $L_{Aeq,16hrs}$ .

It is likely the proposed changes to North Runway operations will have a significant effect at operations at Tippy Toes, and will likely lead to an increase in the occurrence of adverse noise effects. Evidence suggests that long term exposure to environmental noise levels at these projected levels will likely lead to harmful effects on children in the area.

In my professional opinion, the noise impact assessments carried out to assess operations of the North Runway are erroneous and need to be reviewed as a matter of urgency.

Sincerely,



Dr. Eoin A. King

Member	; European Commission Noise Expert Group
Vice President	; International Institute of Noise Control Engineering
Managing Editor	; Noise/News International
Lecturer	; Mechanical Engineering, University of Galway

**Memo:            Technical Note on the assessment of noise impact from night-time operations at Dublin Airport for Tippy Toes Playschool and Afterschool**

Author: Dr. Eoin King

Date: September 29<sup>th</sup>, 2022

All views and opinions presented in this technical note are entirely my own. I have not received payment from any party to produce this technical note. It is entirely independent.

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## **Introduction**

In 2007, the airport authority for Dublin Airport (DAA) was granted planning permission to build a new runway. This permission included several planning conditions, including operating restrictions during the night-time due to noise considerations. The plans for the new runway were then put on hold due to the economic downturn, but in 2016, with increasing passenger numbers, the plans were revived.

In December 2020 the DAA submitted a planning application to the Planning Authority seeking to amend those 2007 conditions associated with night-time operating restrictions. The application was then referred to the Aircraft Noise Competent Authority (ANCA) for an assessment of the associated noise impact, and in June 2022 ANCA issued a regulatory decision, which approved some changes to the 2007 Planning conditions.

This technical report attempts to summarise what effect these changes may have on the operations of Tippy Toes and the children who attend.

As noted in paragraph 13.3.7 of the EIAR, “*The Relevant Action specifically relates to controls at activity at night, however the effect on movements is not confined to the night period, as for example an aircraft that becomes able to arrive at night may then depart during the following day. The  $L_{den}$  metric also takes into account activity at night so both it and the  $L_{night}$  metric respond to changes in activity at night and so are considered directly relevant*”. Thus, any changes to operations of the airport regarding night-time movements, may have a direct effect on the acoustic environment at Tippy Toes during school hours.

In order to establish the likely impact, the existing baseline noise environment must first be established.

## **Noise Measurements**

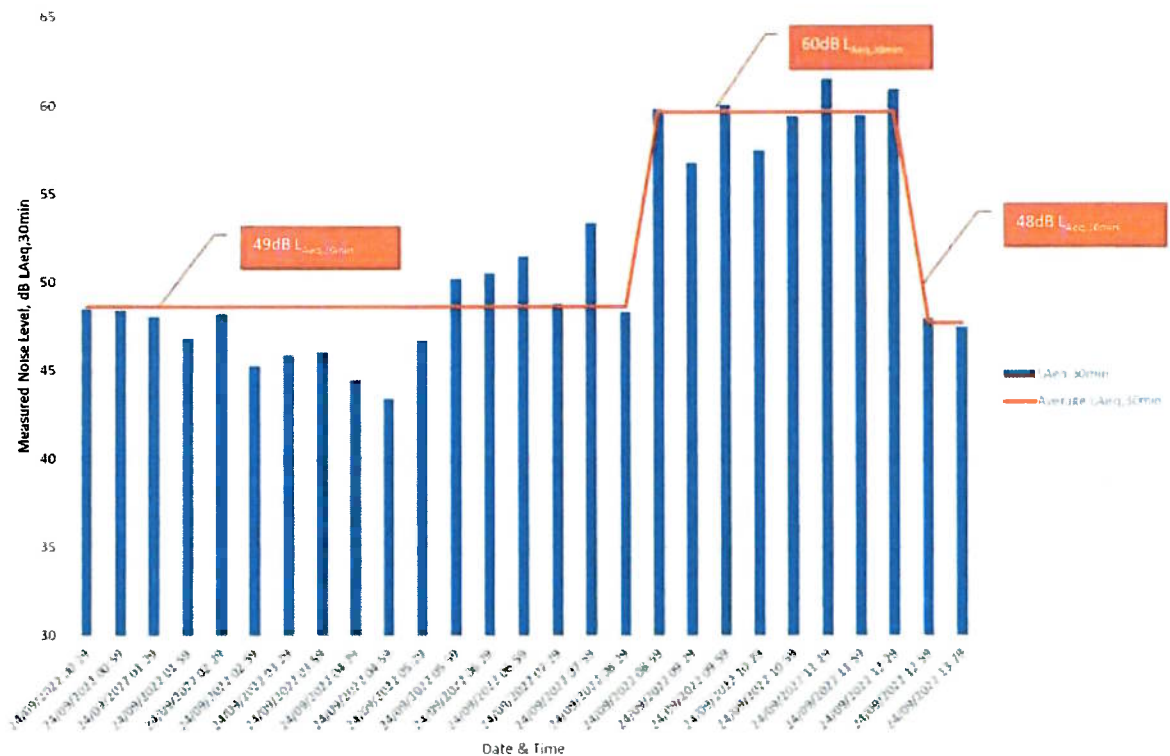
Unattended noise monitoring was carried out at the premises adjoining Tippy Toes on Saturday 24<sup>th</sup> September between the hours of 00:00hrs and 13:30 hrs (Figure 1). Noise levels were logged every second, and data was used to calculate the  $L_{Aeq, 30min}$  for each half hour period. Results clearly show aircraft operations over the test location, and the  $L_{AF,max}$  and  $SEL$  for each movement could also be calculated. The meter was calibrated before use, and calibration was checked after completion.



**Figure 1:** Noise Monitor in place at premises adjacent to Tippy Toes

### Measurement Results

Figure 2 presents  $L_{Aeq, 30min}$  results during the measurement period. Operations on the North Runway began just after 9am, and finished just after 12:30. This is clearly evident in measurement results. It can be seen that operations at the North Runway cause the  $L_{Aeq, 30min}$  to increase from approximately 49dB(A) to 60dB(A).



**Figure 2:** Results of Noise measurement campaign. Aircraft movements began at 9am. Measurements logged in one second intervals were also cross reference with aircraft movements reported by an independent flight tracking website (flightradar24.com). By comparing the timestamp in results and flight profiles, it was possible to assign an aircraft type to each noise event recorded during the measurement campaign. The  $L_{AF,max}$ ,  $L_{Aeq,T}$  and the  $SEL$  of each event could then be calculated (Table 1).

Time	LAFmax	LASmax	Duration of flyover, T seconds	Laeq,T dB	SEL	Aircraft
9/24/22 9:10	80	77	41	71	87	B738
9/24/22 9:12	76	73	38	69	85	A320
9/24/22 9:14	80	77	52	70	88	B738
9/24/22 9:25	77	73	40	66	82	B738
9/24/22 9:36	76	74	44	68	85	B738
9/24/22 9:38	80	77	39	71	87	B788
9/24/22 10:02	77	72	26	67	81	737-max
9/24/22 10:04	80	78	47	71	88	737-max
9/24/22 10:12	76	73	46	68	85	A320
9/24/22 10:29	80	78	35	71	87	B788
9/24/22 10:32	77	74	48	68	85	A320
9/24/22 10:55	79	76	37	70	86	A320
9/24/22 11:05	76	70	47	63	80	B738
9/24/22 11:12	76	73	43	66	82	A320
9/24/22 11:14	77	74	41	68	84	A320
9/24/22 11:16	73	68	33	62	77	ATR 72-600
9/24/22 11:21	75	72	45	66	83	B738
9/24/22 11:28	79	76	38	71	87	Embraer E190LR
9/24/22 11:32	77	75	42	69	85	A320
9/24/22 11:38	84	81	35	73	88	B787-9 dreamliner
9/24/22 11:48	79	76	41	70	87	B738
9/24/22 11:49	78	75	41	69	85	A320
9/24/22 11:56	81	78	42	71	87	B738
9/24/22 12:06	77	75	46	68	85	A320
9/24/22 12:15	78	76	47	69	86	A320
9/24/22 12:17	81	77	42	71	88	757-224
9/24/22 12:26	73	70	29	64	79	B753
9/24/22 12:30	75	70	36	67	83	B764
9/24/22 12:35	78	76	36	70	85	B738
9/24/22 12:43	76	73	50	67	84	A320
9/24/22 12:55	81	79	64	73	91	A330

**Table 1:** Details of individual noise events and identified aircraft

It is noted that the SEL for each aircraft movement is mostly in excess of 85dB(A) and in one case was in excess of 90dB, while  $L_{AF,max}$  levels range from 73-84 dB(A), at this location which is ~4.5km from Dublin Airport.

### **Observations on Measurement Results**

- The actual number of departures from the North Runway were between 11 and 20 per hour during the survey. Not all North Runway departures fly over the playschool as some diverge much earlier and turn away from the school. The number of hourly departures aligns with the DAA figures for flights in the 2022 westerly operation scenario. However, by 2040 assuming the passenger cap is removed the hourly departures will have increased to by over 30 per hour during school hours.
- As a conservative estimate, assuming a simple increase based on the following:

$$X = 10 \log_{10} \left( \frac{N_{future \text{ flights/hr}}}{N_{current \text{ flights/hr}}} \right)$$

an increase of between 3 and 5dB to overall noise levels may be expected.

- It is noted the noise levels recorded on site are in excess than what was originally predicted in the assessment of noise impact from operations on the North Runway for

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LEGEND

- Noise Contours
- 50, 53 and 59 dB Levels
- Modelled Runway Noise

REVISIONS

**Bickerdike  
Allen  
Partners**

Dublin Airport  
North Runway

Airborne Aircraft Noise Contours  
2022 High Growth Typical Busy Day  
Option 7B

DESIGNED BY: [Redacted] CHECKED: DC

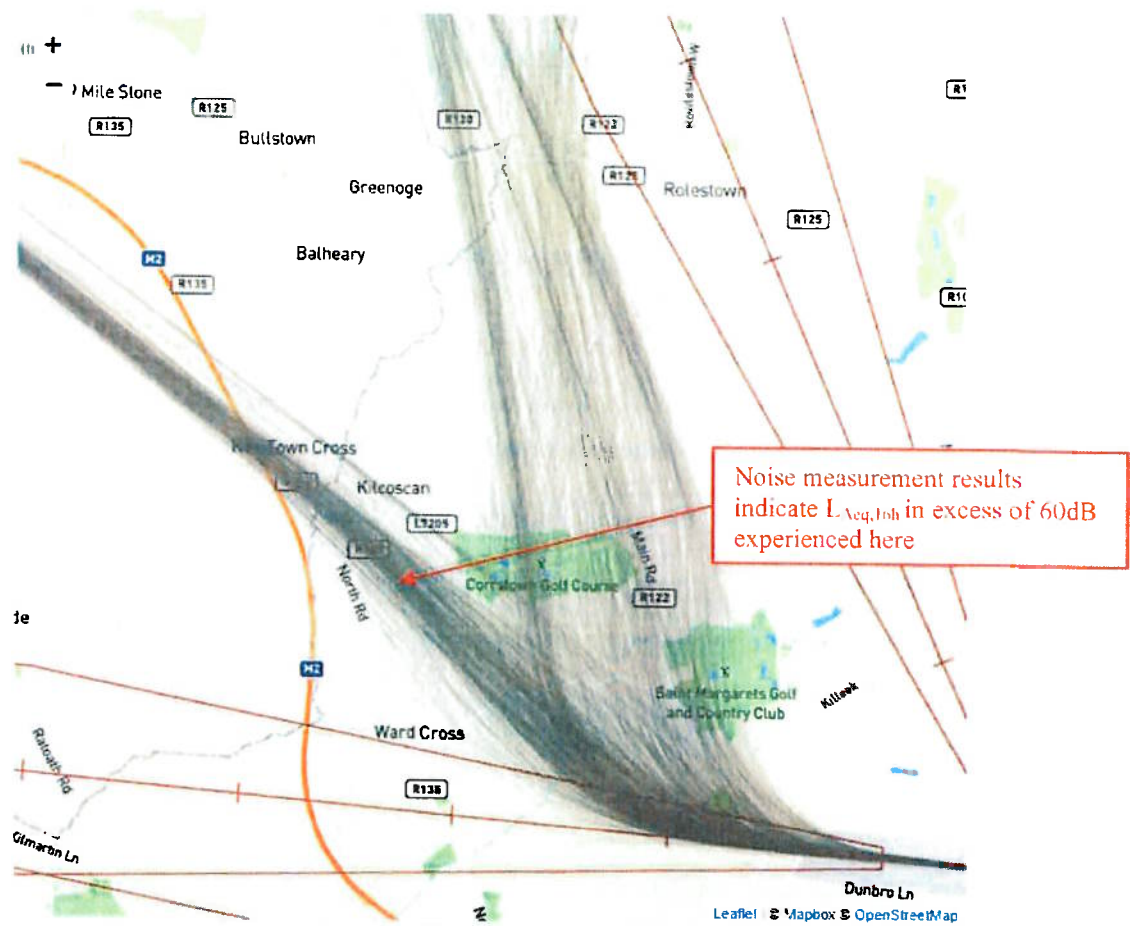
DATE: October 2016 SCALE: 1:75000@A4

FIGURE No

**A9843-R03-Rev3-01**

- The source of these errors should be identified and rectified in order to produce meaningful impact assessments. While a detailed error assessment is beyond the scope of this report, an attempt has been made to identify the source of error. Upon a consideration of the projected operations of the North Runway contained in the EIAR, compared to the existing operations, it is evident that aircraft movements are not as were initially planned. This is immediately evident when the actual flight paths are considered (Figure 4), here it is clear that Tippy-Toes Playschool and Afterschool is now directly underneath a flight path.





**Figure 4:** Flight Paths from North Runway – it is noted that Tippy-Toes Playschool and Afterschool is now directly underneath a flight path.

- Another potential source of error is the model itself. It is worth noting that the measured  $L_{AFmax}$  recorded for individual aircraft movements (Table 1) significantly exceed those predicted by DAA in their response to ANCA's request for further information<sup>1</sup>. In the response document, modelling suggests that an  $L_{AFmax}$  value exceeding 80dB would not be experienced at locations greater than approximately 2.5km from the North Runway, yet measurement presented with the current report show that  $L_{AFmax}$  values exceeding 80 dB are regularly experienced at a premise approximately 4.5km away. This would reinforce the conclusion that the noise assessments conducted to date are erroneous.

### ***Observations on the Night-time Noise Quote***

Separate to the measurement campaign carried out for this report, it should be noted that the proposed noise quota system does not include an accompanying movement limit. If there is no movement limit, any aircraft movement with a noise classification of below 81dB EPNL will not contribute to the 'noise quota', despite the fact that it is a noise generating movement. Thus,

<sup>1</sup> [https://www.lingal.ie/sites/default/files/2021-06/nr-anca-response\\_v1.0\\_0.pdf](https://www.lingal.ie/sites/default/files/2021-06/nr-anca-response_v1.0_0.pdf)

this could ultimately lead to unlimited night-time operations at Dublin Airport, which would have a direct effect on daytime operations. The use of a Noise Quota system alone is not appropriate, and it needs to be operated in parallel with a Movement Limit, as in the case in Heathrow, Gatwick, and Stansted.

### ***Overall Conclusions***

The following conclusions may be drawn:

- No accurate and complete assessment of the acoustic impact of operations at the North Runway has been conducted. Therefore, it is not possible to accurately quantify the impact a change in night-time operations will have on the surrounding community.
- The errors in the impact assessment are likely due to the fact the aircraft movements are not operating as was initially planned in the EIAR. The flight paths are entirely different from those planned, and it has led to the Tippy Toes Playschool and Afterschool premises being directly under a flight path.
- An increase in night time movements will likely lead to an increase in daytime movements, as the operational capacity of the airport will be increased. This will increase noise levels in the surrounding community, such area including the location of the Tippy Toes Playschool and Afterschool premises.
- The proposed noise quota will allow for unrestricted night-time movements for aircraft with a noise classification of below 81dB EPNL, despite the fact that these aircraft would still result in noise generating movements.

In my professional opinion, the noise impact assessments carried out to assess operations of the North Runway are erroneous and need to be reviewed as a matter of urgency.