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File With \_\_\_\_\_

**SECTION 131 FORM**

Appeal NO: ABP 314485

TO: SEO

Defer Re O/H ☐

Having considered the contents of the submission dated/ received 23/12/26  
from

Noelle Dollan I recommend that section 131 of the Planning and Development Act, 2000  
be/not be invoked at this stage for the following reason(s): no in 1850

E.O.: [Signature]  
To EO: \_\_\_\_\_

Date: 23/12/24

Section 131 not to be invoked at this stage. ☐

Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.: \_\_\_\_\_

Date: \_\_\_\_\_

S.A.O.: \_\_\_\_\_

Date: \_\_\_\_\_

M \_\_\_\_\_

Please prepare BP \_\_\_\_\_ - Section 131 notice enclosing a copy of the attached  
submission

to: \_\_\_\_\_

Allow 2/3/4 weeks – BP \_\_\_\_\_

EO: \_\_\_\_\_

Date: \_\_\_\_\_

AA: \_\_\_\_\_

Date: \_\_\_\_\_

File With \_\_\_\_\_

**CORRESPONDENCE FORM**Appeal No: ABP 314485-22Please treat correspondence received on 23/12/24 as follows:

1. Update database with new agent for Applicant/Appellant \_\_\_\_\_

2. Acknowledge with BP 233. Keep copy of Board's Letter ☐

1. RETURN TO SENDER with BP \_\_\_\_\_

2. Keep Envelope: ☐3 Keep Copy of Board's letter ☐

Amendments/Comments

## 4. Attach to file

(a) R/S ☐(d) Screening ☐(b) GIS Processing ☐(e) Inspectorate ☐(c) Processing ☒RETURN TO EO ☐EO: [Signature]Plans Date Stamped ☐Date Stamped Filled in ☐AA: [Signature]Date: 23/12/24Date: 23/12/24

## Alfie Staunton

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**From:** Noelle Dollard <noelle.dollard@gmail.com>  
**Sent:** Monday 23 December 2024 14:55  
**To:** Appeals2  
**Subject:** Observations on Draft Decision ABP-314485-22; Noelle Dollard, my Ref NPA-OBS-002931  
**Attachments:** APB 2.docx

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir/ Madam,

Further to my initial observations made to you on 13/12/2023, please find attached observations in respect your draft decision in this matter.

Yours sincerely,

Noelle Dollard

## 8 Barley Hill, Ballyboughal, Co Dublin

My Observation ref; NPA-OBS-002931 Your Case ref; ABP-314485-22

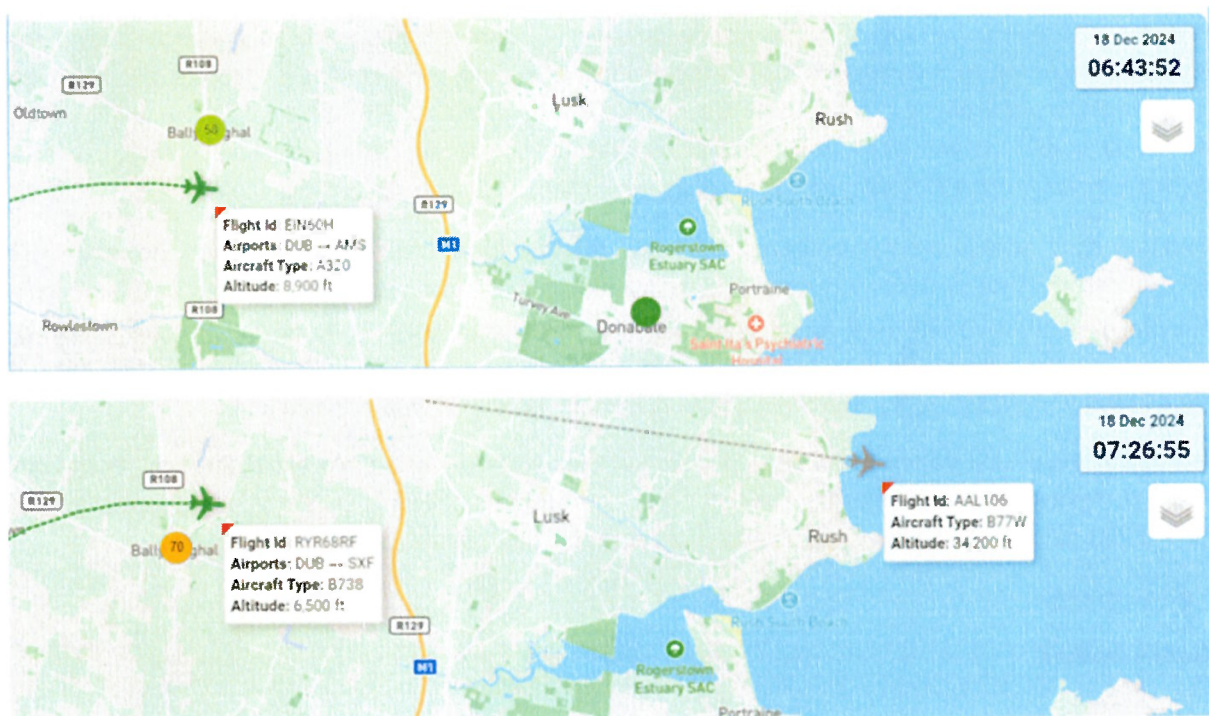
An Board Pleanála

Dear Sir/ Madam,

Thank you for the opportunity to respond to your draft decision. I will concentrate my observations on the operating hours of the North runway, as any increase in same will have a serious consequence on the quality of our lives through sleep disturbance.

Please do not allow the proposed change to the night time use of the North runway by permitting flights to take off from and or land on the North runway for an additional two hours per day (from 23.00 to 00.00 hours and from 06.00 to 07.00 hours). There is a discernible difference in the level of noise caused by overflying aircraft in Ballyboughal depending on whether an aircraft has taken off from the South runway or the North runway. The difference is evidenced by looking at the official aircraft noise monitoring data for Ballyboughal<sup>1</sup> which clearly shows substantial noise differences, with lower noise associated with flights using the South runway compared to those using the North runway.

The reason for this appears to be connected to altitude, with aircraft taking off to the West using the South runway typically flying over Ballyboughal at a higher altitude than those using the North runway. In very simple terms, planes which use the northern runway cause more noise disturbance in Ballyboughal. The following screenshots show flight data, including noise levels from the Ballyboughal monitoring station for two flights; the first of which used the South Runway (as it took off before 07.00 hours) and the second, which used the North Runway (as it took off after 07.00 hours).



In the case of these two flights, the noise difference is 12dB (58dB for the South Runway flight & 70dB for the North Runway flight). While the level of noise varies from flight to flight, the general principle

<sup>1</sup> <https://webtrak.emsbk.com/dub1>

holds true that aircraft noise in Ballyboughal is nearly always higher for aircraft that have taken off from the North runway. Please note that such data was not available in December 2023 when I made my initial observations as the noise monitoring station in Ballyboughal was not in operation at that time.

In the context of impact, EASA, the EU Aviation Safety Agency, have said that *“Exposure to aircraft noise affects the health and wellbeing of millions of people in Europe, with those living in residential communities in the vicinity of airports being particularly affected. These impacts can take the form of stress caused by annoyance, sleep disturbance, heart disease, premature mortality due to ischaemic heart disease and even learning impairments in children<sup>2</sup>”*.

Overflying aircraft using the current flight paths from Dublin Airport, cause regular sleep disturbance in our home. The impact is worse for flights using the North runway, which are almost always noisier. Any extension of the hours of operation of the North runway will make this sleep disturbance worse.

In both the examples above, the noise levels are significant and enough to cause annoyance. However, in the case of the flight which used the North runway, noise at the level of 70dB is excessive and likely to cause sleep disturbance. This reflects the experience in my household, where flights passing overhead at night regularly wake adults and children when the North runway is in use. If the proposed change in operating hours is approved, then sleep disturbance will most certainly take place between 23.00 to 00.00 hours and again from 06.00 and 07.00 hours. This is most unreasonable and also unnecessary having regard to availability of the South runway. The eight hour night period from 11pm to 7am daily, during which the North Runway cannot currently be used, must be maintained as it causes less noise and provides a better chance of undisturbed sleep.

I would also ask you to reflect on the comment at page 8 of your draft decision which rightly states that *“Aircraft noise is not experienced as an average”*. The report continues that *“This impact can be mitigated through...the use of an insulation scheme”*. However, there are no plans to extend the insulation scheme to Ballyboughal as it sits far outside the eligibility contours, despite aircraft noise causing sleep disturbance. The aircraft responsible for the 70dB noise in screenshot two is one of the so-called quieter newer generation aircraft operated by Ryanair. This is a good example of why average noise is not a suitable means of measuring annoyance and sleep disturbance.

Separately, it should be remembered that the current flight paths for the North runway were introduced by DAA without any public consultation and at total variance with the environmental impact assessment submitted as part of planning permission granted in 2007. The DAA has not engaged in any meaningful way with the residents affected by the new flight paths and they are not being held to account by the supervising authorities, including An Board Pleanála.

In conclusion, please do not allow any extension of the night time use of the North runway, as this will most certainly increase sleep disturbance. The communities of North Dublin are dependent on An Board Pleanála to uphold their rights and protect their health by refusing this application.

Yours sincerely,

**Noelle Dollard**

Via Email on 23/12/2024

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<sup>2</sup> <https://www.easa.europa.eu/eco/eaer/topics/adapting-changing-climate/noise>