

Aircraft noise Competent Authority

Fingal County Council

Swords

Co Dublin

22nd February 2022

████ Ashley Rise

Portmarnock

Co Dublin



Antúdarás Inniúil um
Thorann Aerárthaí

Aircraft Noise
Competent Authority

22/2/22

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Re: Aircraft Noise and Changes to Planning Conditions

Dear Sir/ Madam

We have already made an extensive submission to FCC regarding the DAA application (Planning Reference F20A/066) to change the Planning conditions set down by ABP in 2007 for the operation of the North Parallel Runway. ABP set down 31 conditions after an extensive oral hearing in 2007.

Changes to planning conditions 3(d) and 5 set down how the runway was to be operated during night time from 11.00PM to 7.00AM. The main reasons for these conditions was to minimise the effect of aircraft noise on airport communities during the hours of sleep. The DAA now want night time hours to be changed from 12.00AM to 6.00AM. If ANCA approve of these changes it would have very serious consequences for the health of residents living near the airport as their sleep would be disrupted with very serious health consequences.

The World Health Organisation (WHO) have clearly pointed out the effects on people's health of noise levels exceeding 45 dB especially at night. Aircraft noise is considered to be the worst form of noise. An aircraft taking off is similar to a thunder clap. Can ANCA envisage what the implications of thirty thunder claps per hour from 6.00AM in the morning?

There are several studies showing the effect on people's health resulting from noise levels during sleeping hours. These include:

Hypertension

Stroke

Arrhythmias

Sleep disruption

Physiological stress reaction

The sleep disturbance for school going children and children with special needs e.g. autism has not been considered by ANCA. Neither has the noise impact on the elderly be given due

consideration. Portmarnock, Malahide and Swords have very many retired people in their communities as well as elderly people living alone.

The insulation scheme offered by the DAA is totally inadequate as it is only offered to residents with noise levels over 55db at night. Houses built from the 1970s onwards have practically no noise insulation. We would argue that the insulation scheme should be given to all residents in the 45db contour.

The necessity for early morning flights was not addressed by ANCA. There is no reason why travel to holiday resorts should begin at 6.00AM. It has been shown that the necessity for business travel should no longer be as urgent as prepandemic as most companies operated very effectively during the covid pandemic by using such methods as zoom, webinars etc. to conduct their business.

Surely ANCA should prioritise the health impact on airport communities' over the economic benefits to the Irish economy by changing these conditions. It could be argued that the consequences for our health budget will far outweigh the benefits to the economy.

Dublin airport being used as a major international connectivity hub is another reason why the DAA want ABP conditions changed. This would mean much larger and noisier planes using Dublin airport at night without any great benefits to the Irish economy.

By allowing these changes we feel that the Balanced Approach envisaged under EU regulation 598/14 (17 articles) is certainly not being adopted by ANCA and have allowed the DAA to get more than what they wanted in their submission to FCC.

In conclusion we want to state that the Planning Application submitted by the DAA during the pandemic made it very difficult for communities to discuss their submission as all public meetings were cancelled. The webinar meetings conducted by ANCA were no real substitute for real meetings as the cross examination of the panel could not take place. ANCA should also have taken into consideration the submissions made by airport communities to the planning authority before reaching their conclusion.

Our only hope now is that ABP will stick with their original conditions and not allow the DAA to get their way and ignore the wishes of airport communities.

Yours sincerely

Ursula Horan

