Broughan,

The Ward,

Co. Dublin

27 Feb 2022

RE: AIRCRAFT NOISE CONSULTATION SUBMISSION

Dear Sir / Madam,

As residents directly affected by DAA’s aircraft noise pollution from its operation of its runways at Dublin Airport we wish to strongly object to the current proposals to allow more night flights at Dublin Airport between the hours of 23.00 and 07.00.

We request that ANCA take all the points raised by ourselves and our neighbours in this submission into account in arriving at any decisions, and to provide answers to all residents regarding these issues.

Yours Thankfully,

G & G Hughes

* We live under one of the flight paths at Dublin Airport. Our family have lived for many decades in the St. Margaret’s & Ward areas, and long before the original development of Dublin Airport, or DAA’s developments of either it’s southern or newest northern runway. It is already extremely noisy in the flight path, and we feel that any increase in the number of flights taking off at night will further exacerbate the situation. This will affect our health as numerous studies show. We are entitled to rest peacefully without disruption at night as per the WHO recommendations. DAA want to turn Dublin Airport into a 24-hour HUB airport operation with flights non- stop throughout the day and all night. DAA wants to endlessly extend its operation hours to facilitate the greed of this company. The idea that more night flights could also be permitted at a significantly increased number is simply unacceptable. We can see no material benefit to this proposal and see only downside risks to the health and mental well-being of residents already impacted by aircraft noise.

* Daa identified homes as requiring various noise insulation works in its surveys. However, despite DAA eventually providing residents with a contract for the installation of the various noise insulation works in their homes, some residents that signed contracts with DAA in 2020, have still not have had any of the agreed noise insulation works installed in their homes to date in 2022 due to endless difficulties with DAA regarding the installation of the agreed works. Residents should not have to take enforcement proceedings via Fingal CC to ensure DAA install the agreed noise insulation works in their homes. Nor is it clear exactly whether ANCA can ensure that DAA comply with the installation of the agreed noise insulation works.
* Some residents were so concerned by the methodology by which DAA were proposing to install the noise insulation works that they categorically refused to allow DAA install the works at all as they were concerned that the works would cause severe damage to their homes and end up causing further devaluation of their homes by DAA – worse devaluation than that caused by DAA’s noise pollution. We understand that in their “publicity” statements the DAA may have noted these homes “as being completed” on their “lists” even though those houses have had no noise insulation installed.
* Other residents have had serious problems endeavouring to ensure that the works that DAA recommended for installation in their homes were installed correctly and some have had to already carry out further remedial works themselves within months of the works being installed by DAA. It is still extremely unclear whether ANCA or Fingal CC have any role in ensuring whether any of the DAA noise insulation works are installed correctly or whether they are in any way effective?
* It appears that some other residents have had to resort to legal action via the courts to try and get DAA to complete the works already agreed & started, but not completed by DAA, installed in their homes. Again, can ANCA or Fingal CC ensure that DAA complete such works?
* Fingal CC or ANCA should ensure that residents are allowed have their own architect independent architect supervise the installation of any insulation works during the process of installation. Currently DAA have refused to allow this, and residents have had no means to check that the works are installed correctly. Fingal CC must have some role here.
* No flights should be allowed from 23.00 to 07.00 at all but if there are to be any such fights then none should be allowed until all the houses already identified by DAA & ANCA as requiring noise insulation have those noise insulation works fully installed. ANCA or Fingal CC must ensure that ALL these homes are insulated from the DAA noise pollution prior to the new runway opening. ANCA or Fingal CC must check that DAA have installed the recommended works correctly. Otherwise, residents will again face problems with condensation, water ingress via windows and doors, no actual reduction in internal noise reduction etc. The fact that no forced ventilation system is allowed for is astounding – this is now basic in many new builds of housing. Are residents expected to live in their houses with doors and windows closed 24 hours per day to keep DAA’s noise pollution out and no forced ventilation method to allow fresh air into their homes?
* It is not clear if any of the noise insulation DAA works installed by DAA have ever been inspected by Fingal CC to ensure they were installed correctly or whether they achieved the required noise reductions. What reductions in DAA’s aircraft noise pollution were achieved in the houses where DAA have installed their recommended noise insulation? We understood that site inspections and acoustic surveys in a representative sample of 20% of the properties insulated would be conducted as part of the quality control measures during the construction phase to check that the noise insulation installed was effective. There does not appear to be any public records of any such checks. Can ANCA or Fingal CC provide details?
* The fact that DAA will not allow a resident to have an architect present as the various DAA noise insulation works are installed is extremely unusual and would not be normal building practice. It is essential that residents are allowed to have an architect present throughout the process to ensure that DAA installs all the works correctly.

* Testing conducted within the St. Margaret’s & The Ward area on housing that has already been insulated by the Daa recently, indicates the guidance referred to by Fingal County Council and the WHO cannot be achieved and will cause serious health issues of those affected by the proposed increase in night-time noise. It appears that the existing noise insulation schemes are not capable of significantly reducing the DAA noise pollution of resident’s homes. Indeed, the aim of the scheme to just reduce the existing noise by 5 to 10Db is extremely low considering the extreme levels of DAA noise pollution in the homes caused by DAA aircraft noise pollution. Such reductions in the most adversely affected homes will not bring the noise levels down to anything near the WHO guidelines. The fact that no forced air ventilation scheme was allowed for by DAA in the noise insulation scheme is astounding.
* No mitigation measures are proposed by the Daa or ANCA to solve the health implications being imposed by the removal of the existing restrictions. Who is going to pay for the health costs associated with night flights? Have ANCA engaged any medical experts in their assessments so far of the DAA proposals? Only acoustic experts have been contacted from what we can ascertain.
* There is also the matter of climate change and airline related emissions. These proposals regarding night flights seem to be totally at odds with stated Irish government objectives of reducing Ireland's emissions.
* There appears to be a lot of confusion with residents as to the exact DAA & ANCA proposals regarding distribution of night flights and regarding the numbers of houses that might be eventually insulated under any noise insulation schemes. Many people are extremely surprised to note that currently under the DAA noise insulation schemes that less probably less than 200 houses have been identified for noise insulation works in the vast areas affected by DAA noise pollution from its operation of both the north and south runways, including areas to the west such as St. Margaret’s & The Ward, or to the east in areas from Swords, Malahide, Kinsealy etc. A smaller number of homes have been insulated to date. It appears that very few additional homes will be included in any future noise insulation schemes. Can ANCA, DAA or Fingal CC provide an estimate of how many additional homes will be included for insulation under the various new proposals?
* The suggested future noise insulation grant would be extremely unlikely to cover the costs of actual noise insulation. Nor is there any obvious proposal to have that noise insulation grant indexed linked to inflation. A levy should be placed on every passenger that uses Dublin Airport to fund proper noise insulation schemes for housing adversely affected by DAA noise pollution by its operation of Dublin Airport. A levy of even 10c per passenger would produce substantial yearly revenues to help fund such noise insulation schemes in future. At traffic levels of 35m passengers per year as in 2019 that would produce €3.5m per year to insulate homes in a much wider area etc.
* The current proposals would apparently enable 65 plus flights per night from Dublin Airport, throughout the night. It is not extremely clear whether all these night flights might be inflicted on the existing residents’ homes under the southern runway or whether some would also be from the new northern runway. Nor is it clear if there will be any hours what’s so ever during the “nigh time” when no flights will land or depart from Dublin Airport, unless as genuine emergency landings. Nor is there any guarantee that the number of lights might not increase dramatically over the coming years. There appears to be some loopholes that allow certain flights of a certain noise level to be excluded from the calculations. This is extremely concerning as each, and every flight movement will disturb residents at night.
* Residents under the northern & southern runway would prefer that there were no night flights to or from Dublin Airport between the hours of 23.00 and 07.00. If there are to be 65 flights or more nightly, as suggested, then many residents on the southern runway would obviously prefer that all these night flights are on the longer new runway or else that the night flights are divided over both runways rather than all being placed on the existing southern runway. None of this is outlined in basic terms in the available literature – nowhere does it state that there will be a certain number on any runway or at any particular hours. Will there be any hours throughout the night with no flights at all? Can ANCA, DAA or Fingal CC clarify?
* Many residents have queried the basis of the methodology regarding the baseline dates on which future forecasts regarding air traffic movements at Dublin Airport.
* The proposed NQS for Dublin Airport does not include any aircraft movement limit for Dublin Airport.
* The proposed NQS for Dublin Airport does not distinguish between seasons. The proposed NQS for Dublin is therefore an incomplete interpretation of the quota scheme operated at other airports which are apparently being used as a model for the current proposals. In particular, the proposed NQS includes a “Noise Quota Limit” without an accompanying movement limit.
* Further, the Q Climit of 16,260 proposed for Dublin far exceeds the limits in place at other airports upon which this model is based. Research seems to suggest that the NQS figure of 16260 has been developed to allow for all the Daa’s future forecasts (not one flight will be curtailed).
* The points system in the NQS involves the classification of aircraft into different categories, based on the Effective Perceived Noise Level (EPNL), as determined from their ICAO noise certification data. Aircraft quieter than QC/0.125 are currently exempt from the noise quotas but, very importantly, they do count towards each airport’s movement limits in most other airports. If not for the movement limit, any aircraft movement with a quota count value of zero would in effect be unlimited, despite the fact that it is a noise generating movement. Thus, 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 (the airport upon which the proposed scheme is apparently based). The Dublin calculations should also include a movement limit. The Irish EPA have highlighted concerns regarding “the fact that different aircraft types are assigned different noise values” and highlight the fact that it “would be useful to consider including a reference table highlighting some of the standard aircraft noise values currently in operation at Dublin Airport.”
* The total of 16,260 QC points far exceeds the totals in Gatwick, Heathrow, and Stansted. It should be reduced significantly. A reduction in this limit would go some way in to meet the stated objective of limiting and reducing the long-term adverse effects of aircraft noise on health and quality of life.
* In the wider context of noise impact on health, the quota system fails to account for the spread of events over time.
* The Noise Quota scheme fails to account for the number of events, which many consider to be a good indicator of noise annoyance.
* This is an important consideration in the wider context of assessing overall impact from aircraft noise. It is quite likely that the Lnight noise indicator underestimates the extent of sleep disturbance because it averages noise over a long period effectively smoothing out and downgrading the impact of intermittent and impulsive noise events that are known to have a highly negative effect on sleep patterns.
* The limit16,260 (and the limit of 7,990) appears to simply be a representation of what the DAA needs the quota to be, in order to operate as forecast with as little restriction as possible.
* The use of a quota system based on EPNL fails to account for noise events. A movement limit in parallel with the noise quota would go some way to address this issue.
* The health implications & costs of future health costs of allowing night flights has not been considered by DAA, Fingal CC or Anca to date. The submission from the HSE Environmental Health to Fingal County Council states that all efforts should be made to minimize the number of people subjected to the adverse health effects of aircraft noise by reducing aircraft noise levels to below the WHO safe limits of 45dB Lden and 40dB Lnight. The cost of treating these health conditions in the population around the runways at Dublin Airport is not estimated but it will be paid by all the taxpayers for years to come, while the benefit of introducing the night-time flights will be solely at the advantage of DAA and related businesses. When it comes to expanding Dublin airport, the authorities will have to weigh the benefits of commercial interests against the danger to public health. Exposure levels beyond the WHO safe limits leads to Hypertension, Cardiovascular disease, cognitive impairment in children, mental health issues.
* We object to the divergent flight paths proposed by the Dublin Airport Authority which have NOT been the subject of a planning permission. It is not clear to residents around Dublin Airport when or if planning permission was ever granted for the divergent flight paths which are now required for the operation of the two parallel runways. We cannot find any mention in any of the planning applications to Fingal CC over the years for any proposal for divergent flight paths. The documents now lodged to ANCA by DAA clearly states an intention to now operate with divergent flight paths on departure, thus exposing residents even within the periphery of the existing noise zones to ever increasing aircraft noise pollution levels. Hopefully ANCA will not decide to endorse such a method of operation when clearly no planning permission was ever sought or applied for such, and it would be totally in breach of the Fingal CC planning laws. We request that ANCA must in any final decision that departures must be straight out on the centre line of the flight path as per the DAA planning applications & the decisions of ABP. Residents always understood that all jet engine flights taking off from Dublin Airport would take off and stay on the centre line of the flight path for 5 miles before turning. In the past year many jet departures from the existing S runway to the west have not been keeping to a straight-out departure and in many cases have veered much further N immediately on take-off, in some cases totally outside the flight path area on the DAA, ANCA & Fingal CC maps.
* There are also questions regarding the old “Public Safety Zones” and whether their status has ever been sorted out and adopted legally in the Fingal CC planning or Development Plans. Has ANCA any role in these matters which have remained unresolved for decades?
* The selection of 2019 or 2018 as the baseline for noise comparison does not meet the requirements of Directive 2002/49/EC as required by the Aircraft Noise Dublin Airport Regulation Act of 2019. The escalating noise reported in the noise action plans dating back to 2008 have been ignored with respect to reducing and prevention of noise at Dublin Airport.