

File With _____

SECTION 131 FORM

Appeal NO: ABP 314685

TO: SEO

Defer Re O/H ☐Having considered the contents of the submission dated/ received 16/12/20
fromPeter Cough 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 w 1800E.O.: [Signature]Date: 20/12/21

To EO: _____

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 FORMAppeal No: ABP 314485

VI _____

Please treat correspondence received on 16/12/24 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**Recd Recd Peter Cough* To be Scanned**4. Attach to file**(a) R/S ☐(b) GIS Processing ☐(c) Processing ☒(d) Screening ☐(e) Inspectorate ☐RETURN TO EO ☐EO: [Signature]Date: 20/12/24Plans Date Stamped ☐Date Stamped Filled in ☐AA: F. KhadijaDate: 24/12/24

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
1 6 DEC 2024	
Fee: €	Type: _____
Time: <u>8.57</u>	By: <u>POST</u>

Peter Coyle,
8 Burrow Court,
Portmarnock,
Co Dublin,
D13 T295

The Secretary,
 An Bord Pleanála,
 64 Marlborough Street,
 Dublin 1, D01 V902

12 December 2024

Re Case Number: ABP-314485-22
Planning Authority Ref. : F20A/0668
Applicant: Dublin Airport Authority
Location: Dublin Airport

A Chara,

Following on your Draft Decision of 11 September 2024 forwarded to me I wish to make some observations to that Draft Decision.

As indicated in your Draft Decision there are a number of factors that have to be taken into account.

I note that in the Draft Decision two particular issues are raised:

"Runway 10L-28R shall not be used for take-off or landing between 0000 and 0559 hours"

And

"Runway 10L-28R shall be used for departure only between the hours of 06.00 and 08.00"

This means that the Southern Runway will be used for departures predominantly and the Northern Runway for landings (apart from 0600 to 08.00 hours). This obviously means that the Contour Map attached in the Draft Decision Noise Action Plan is no longer relevant.

I wish to highlight a few issues that need to be seriously tackled.

In considering the problems relating to night-time flights and its impact on people living close to the flight paths ABP stated in its request for Additional Information:

"aircraft noise is not experienced in an "average" fashion. It consists of periods of comparative quiet when there are no aircraft flying near or over a receptor interspersed with relatively short periods of noise when an aircraft approaches a receptor, builds to a peak at its closest approach and then decays as the aircraft moves away from the receptor".

and ABP also requested from DAA during the application:

"You are requested to assess the probability of additional awakening due to the peak L.. of ATMs at night between 2300 and 0700 hrs.....and for the likelihood

of additional awakenings for the overall annual average number of ATMs at night, based on the approach described in the review supporting the WHO ENG 2018”.

The fact is that calling for an average noise factor is meaningless. The use of a ‘Noise Quota Scheme’ does not address the additional awakenings that take place during the night.

The contour map attached in the Draft Decision only indicates where DAA propose to support areas where household insulation may be eligible. The measurements shown and apparently accepted by ABP were/are just annual averages. They are not allowing for extra seasonal pressure dependent on wind direction e.g. if the spring-summer time measurements were sought with a lot of easterly winds, then the whole of Portmarnock would have a high reading. Night-time awakenings are considerable during this period.

I can quote a number of awakenings and wakefulness that I have had with aircraft. Some of these are on DAA’s complaint records.

I live directly under the flight path of the Northern Runway. I personally invested €12,500 last year in putting in sound proof secondary glazing on top of the high quality double glazing that I had in the windows. However, this did not deter being often awakened during the night-time hours by aircraft going to and from Dublin Airport. Dublin Airport regularly do night-time maintenance of the southern runway. This means that during these periods that we are not able to get to sleep until after 1.00 AM because of continuous noise of aircraft flying directly overhead. I have also recorded many instances of loss of sleep by aircraft overhead including being awakened at 04.30 in the morning. I could not go back to sleep for over half an hour because other aircraft were passing overhead every 4 minutes, Webtrak showed that there were at least **seven** planes landed at Dublin Airport between 04.30 and 05.00 AM. Checking on the website shows that this number of flights takes place almost every night impacting on residents east and/or west of Dublin Airport.

When the wind is from an easterly direction we are awakened every morning about and often before 06.00 AM by the noise of departing aircraft. Planes taking off to the east show decibel levels at 95-100 here in Burrow Court, Portmarnock. The contour maps are fictional for our residences in central Portmarnock

Being awakened by aircraft noise is quite common in areas not included for any noise insulation. The maps supplied bear no relationship to ABP’S own statement “ *aircraft noise is not experienced in an “average” fashion.* ”

I have measured noise readings of 95 to 100 decibels on a regular basis at my location. Even taking a typical night where readings may be had from 00.00 to 01.00 AM and then again from 04.15 to 05.00, the priority is to somehow balance it up with 3 hours and then one to two hours relative calm. **This is totally wrong.** Being unable to go to sleep in the first place and then to be awakened by other flights have to be taken into account. **The Draft Decision of ABP does not address sleep disturbance.** Why do contours only show 55 to 63 contours. What about all these 90 to 100 + Decibel factors that impact on local communities?

Aircraft noise is not experienced in an “average” fashion.

I have pointed out in the past the fact that DAA wanted to operate early morning flights to tie in with Central European Time. They should however ask the Government to introduce Central European Time in Ireland! They should not ask nor should ABP in its Decision agree that discrimination operate for Fingal residents alone to live by Central European Time and allow flights to start at 06.00 hours.

Unlike other European airports that control night-time flights Dublin Airport operate a refuelling stop-over service to airlines at night-time. This may be good for DAA's finances, but they are obviously a major disruption to the lives of thousands of people living near the flight paths.

The fact is that if someone or company made similar noise as aircraft do on the street at night-time they would be arrested. The Planning Authority give a regular standard Planning Condition to builders not to carry out works at night-time. Why is DAA allowed to prevent people having a recommended night's sleep and not comply with WHO guidelines?

I have to highlight the fact that there is gross inefficiency in the Verification of Noise Contour Maps. The discrepancies between the DAA's predictions and the actual noise levels is inadequate.

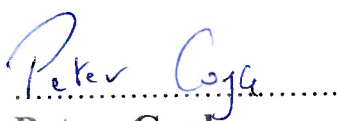
Without independent verification, the plan apparently accepted by ABP cannot be trusted to accurately reflect the true noise impact on surrounding communities. The inclusion of a robust verification process is essential to ensure that noise mitigation measures are effective and that the health and well-being of the most affected residents are safeguarded. As stated earlier more real-time measurements impacting on communities need to be addressed. Quoting average readings over a year is meaningless.

Conclusion.

A night's undisturbed sleep is critical for the general health of people, as recommended by the World Health Organisation. It is also not just a Human Right but also a **Civil Right**. I hope that ABP in its Decision will support that Civil Right for the protection of the night-time sleep for Fingal residents. The Aircraft Noise levels should be verified by an independent source and not DAA.

Aircraft noise is not experienced in an "average" fashion.

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Peter Coyle

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