



**Joe O'Brien TD**

Green Party/Comhaontas Glas

Minister of State  
for Community Development and Charities

Dáil Éireann, Leinster House,  
Kildare Street,  
Dublin 2

28th February 2022

**Re: Aircraft Noise Consultation**

A chara,

I would like to make the following observations in respect of this consultation:

**1. Night time flight hours as proposed represent a significant hazard to human health for effected residents.**

The Dublin Airport Authority (DAA) have proposed the amendment of two planning conditions attached to the development of the new North Runway which would limit the use of North Runway between 11pm and 7am and also place an overall limit of 65 aircraft movements across the entire airport during those hours.

The World Health Organisation (WHO) states that in order to maintain reasonable physical and mental health, a minimum of eight hours of sleep is recommended. Night-time hours are 11pm - 7am and these hours are recognised at the hours in which people are sleeping. To reduce the limits on night-time flights to just six hours between 12 midnight and 6am will by definition prevent effected residents from having adequate unbroken sleep. Furthermore, WHO guidelines strongly recommend that night noise levels should not exceed 40dB.

Research in this area indicates that night time aircraft noise has a statistically significant impact on excess risk of hypertension<sup>1</sup>, coronary artery disease<sup>2</sup>, and acute cardiovascular mortality<sup>3</sup>. In addition to effects on physical health,

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<sup>1</sup> <https://pubmed.ncbi.nlm.nih.gov/18335099/>

<sup>2</sup> <https://pubmed.ncbi.nlm.nih.gov/34775186/>

<sup>3</sup> <https://academic.oup.com/eurheartj/article/42/8/835/6007462?e>

negative effects can be seen in the area of mental wellbeing, with elderly people and children impacted in particular.

In light of the increasing body of scientific evidence demonstrating the deleterious effects of nighttime aircraft noise on human health, it is wholly inappropriate to prioritise the potential economic benefits of expanded flight hours ahead of the wellbeing of ordinary people.

## **2. Use of 2019 noise levels as a baseline is inappropriate**

Under the terms of the planning application, the proposed noise criteria is to be set at 2019 levels as a baseline. Noise monitoring shows that 2019 was the noisiest year on record for the airport. To set this as a minimum “baseline” of noise to be expected from the airport will embed excessive noise as a norm for the area.

It would be more representative to use an average of noise levels in previous years when creating a baseline. The Noise Abatement Objective should be adjusted to remove 2019 as the comparison year and a figure that represents the average of at least the previous five years of operation of the airport should replace it.

## **3. Cost Effectiveness Methodology should consider health impacts**

As referenced above, night time aircraft noise has a significant impact upon the health and well being of those who are effected by it. Any cost effectiveness methodology which seeks to measure the economic impacts of reduced flight hours should also consider the economic benefits of reduced ill-health, mortality, and disability.

**4. Increased flight times are unnecessary and should be actively avoided in the context of our national climate action objectives.**

The unprecedented scale of the climate crisis demands a radical change in the amount of greenhouse gas emissions associated with our daily lives. Any proposal to increase the number and frequency of flights over and above the last 'normal' year of 2019 is significantly out of step with our national and international commitments in this area. The COVID-19 pandemic has demonstrated that frequent business flights are not as necessary as may have been previously thought when communications technology and easy video conferencing offers a ready alternative. An attempt to return to "business as usual" by increasing the number of flights post-pandemic represents a significant missed opportunity.

In conclusion, I believe the proposed amendments to the planning conditions would have a significant negative effect on the health and wellbeing of people living in communities near Dublin airport. In the context of an imperative need to reduce our greenhouse gas emissions, there is little justification for threatening the health of ordinary people in this way.

Many thanks for your consideration of this submission.

Yours sincerely,

A handwritten signature in cursive script that reads "Joe O'Brien". The signature is written in dark ink and is positioned above the printed name.

Joe O'Brien TD