

From:

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Submission on the draft decision by ANCA relating to night time flights at Dublin Airport
25 February 2022 13:07:32

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Aircraft Noise Competent Authority,

To the Aircraft Noise Competent Authority,

I wish to make a submission in relation to the draft decision on night-time flights from Dublin Airport.

Please consider the following points:

In the context of the population in the area, we are talking about the majority of the adult population working full-time and that is between the hours of 7 am to 7 pm. Schoolchildren are daytime hours too. It is crucial that this is taken very seriously under the following criteria:

1. the ability of the community being able to deliver on their jobs and in turn impacting on the economy.
2. the ability of children being able to concentrate in class and the future of their education.
3. the long-term health implications as outlined below - particularly in the area of research carried out in the field of sleep deprivation.

1. Night time flights off the North Runway should not be allowed.

The decision to allow night flights off the North Runway will open up thousands of people to a significant increase in night time noise. This has been linked to cardiovascular disease, cognitive impairment in children and mental health issues. ANCA should defend the health of local communities and reject the DAA application for flights off the North Runway. The original planning permission was a more reasonable balance between protecting communities and the operation of the airport.

2. The use of the 2019 noise level as a baseline is unreasonable and needs to change.

2019 was the noisiest year on record at Dublin Airport and as such was an outlier in the context of noise and its impact on the local community. To set an outlier as the baseline is not reasonable and will lead directly to a significant increase in aircraft noise around Dublin Airport in the short to medium term. We need to start reducing airport noise from a level that represents a fairer reflection of the situation at Dublin Airport in recent years. An average of the noise level over the last five years of full operation at the airport would be a more reasonable starting point. The Noise Abatement Objective should be adjusted to remove 2019 as the comparison year and a figure that represents the average of the last five years of operation of the airport should be put in its place.

3. The cost of the health impact of aircraft noise should be worked out.

If we are to weigh up the value of the impact of noise on the people's health against the economic benefit of growing the airport then both should be measured, as best we can. There is a growing body of research to suggest that aircraft noise can have a negative impact on health and well-being. It is impossible to make an informed decision on the health impact vs the economic benefit if an attempt is not made to quantify these things.

Please take these points on board in the revision of your draft decision.

Yours sincerely,

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