S. 37

File With _____

SECTION 131 FORM

Appeal NO:_ABP 314485-22

Defer Re O/H ☐

Having considered the contents of the submission dated/ received 11/12/2023 from Sheelagh Morris and others 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 new material issues (Inspector to advise)

E.O.: Pat B **Date:** 14/12/2023

For further consideration by SEO/SAO

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: _____ **Task No:** _____

Allow 2/3/4weeks – BP _____

EO: _____ **Date:** _____

AA: _____ **Date:** _____

Validation Checklist

Lodgement Number : **LDG-068835-23**
Case Number: **ABP-314485-22**
Customer: **Sheelagh Morris and others**
Lodgement Date: **11/12/2023 16:01:00**
Validation Officer: **Patrick Buckley**
PA Name: **Fingal County Council**
PA Reg Ref: **F20A/0668**
Case Type: **Normal Planning Appeal PDA2000**
Lodgement Type: **Observation / Submission**

An Bord Pleanála

Validation Checklist	Value
Confirm Classification	Confirmed - Correct
Confirm ABP Case Link	Confirmed-Correct
Fee/Payment	Valid – Correct
Name and Address available	Yes
Agent Name and Address available (if engaged)	Not Applicable
Subject Matter available	Yes
Grounds	Yes
Sufficient Fee Received	Yes
Received On time	Yes
Eligible to make lodgement	Yes
Completeness Check of Documentation	Yes

Run at: 14/12/2023 16:34
Run by: Patrick Buckley

Lodgement Cover Sheet - LDG-068835-23

An Bord Pleanála

Details

Lodgement Date	11/12/2023
Customer	Sheelagh Morris and others
Lodgement Channel	Email
Lodgement by Agent	No
Agent Name	
Correspondence Primarily Sent to	
Registered Post Reference	

Lodgement ID	LDG-068835-23
Map ID	
Created By	Patrick Buckley
Physical Items included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	F20A/0668

Categorisation

Lodgement Type	Observation / Submission
Section	Processing

PA Name	Fingal County Council
Case Type (3rd Level Category)	Normal Planning Appeal PDA2000

Fee and Payments

Specified Body	No
Oral Hearing	No
Fee Calculation Method	System
Currency	Euro
Fee Value	50.00
Refund Amount	0.00

Observation/Objection Allowed?	Yes
Payment	
Related Payment Details Record	

Observation

	A proposed development comprising the taking of a 'relevant action' only within the meaning of Section 34C of the Planning and Development Act 2000, as amended, at Dublin Airport,

at: 14/12/2023 16:05

by: Patrick Buckley

Co. Dublin, in the townlands of Collinstown, Toberbunny, Commons, Cloghran, Corballis, Coultry, Portmellick, Harristown, Shanganhill, Sandyhill, Huntstown, Pickardstown, Dunbro, Millhead, Kingstown, Barberstown, Forrest Great, Forrest Little and Rock on a site of c. 580 ha. The proposed relevant action relates to the night-time use of the runway system at Dublin Airport. It involves the amendment of the operating restriction set out in condition no. 3(d) and the replacement of the operating restriction in condition no. 5 of the North Runway Planning Permission (Fingal County Council Reg. Ref. No. F04A/1755; ABP Ref. No. PL06F.217429 as amended by Fingal County Council F19A/0023, ABP Ref. No. ABP-305289-19), as well as proposing new noise mitigation measures. Conditions no. 3(d) and 5 have not yet come into effect or operation, as the construction of the North Runway on foot of the North Runway Planning Permission is ongoing. The proposed relevant action, if permitted, would be to remove the numerical cap on the number of flights permitted between the hours of 11pm and 7am daily that is due to come into effect in accordance with the North Runway Planning Permission and to replace it with an annual night-time noise quota between the hours of 11.30pm and 6am and also to allow flights to take off from and/or land on the North Runway (Runway 10L 28R) for an additional 2 hours i.e. 2300 hrs to 2400hrs and 0600 hrs to 0700 hrs. Overall, this would allow for an increase in the number of flights taking off and/or landing at Dublin Airport between 2300 hrs and 0700 hrs over and above the number stipulated in condition no. 5 of the North Runway Planning

A Case Number	F20A/0668
Development Description	Permission, in accordance with the annual night time noise quota. The relevant action pursuant to Section 34C (1) (a) is: To amend condition no. 3(d) of the North Runway Planning Permission (Fingal County Council Reg. Ref. No. F04A/1755; ABP Ref. No.: PL06F.217429 as amended by Fingal County Council F19A/0023, ABP Ref. No. ABP-305289-19). Condition 3(d) and the exceptions at the end of Condition 3 state the following: '3(d). Runway 10L-28R shall not be used for take-off or landing between 2300 hours and 0700 hours except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports.' Permission is being sought to amend the above condition so that it reads: 'Runway 10L-28R shall not be used for take-off or landing between 0000 hours and 0559 hours except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports or where Runway 10L-28R length is required for a specific aircraft type.' The net effect of the proposed change, if permitted, would change the normal operating hours of the North Runway from the 0700hrs to 2300 hrs to 0600 hrs to 0000 hrs. The relevant action also is: To replace condition no. 5 of the North Runway Planning Permission (Fingal County Council Reg. Ref. No. F04A/1755; ABP Ref. No.: PL06F.217429 as amended by Fingal County Council F19A/0023, ABP Ref. No. ABP-305289-19) which provides as follows: 5. On completion of construction of the runway hereby permitted, the average number of night

at: 14/12/2023 16:05

by: Patrick Buckley

shall not exceed 65/night (between 2300 hours and 0700 hours) when measured over the 92 day modelling period as set out in the reply to the further information request received by An Bord Pleanála on the 5th day of March, 2007. Reason: To control the frequency of night flights at the airport so as to protect residential amenity having regard to the information submitted concerning future night time use of the existing parallel runway'. With the following: A noise quota system is proposed for night time noise at the airport. The airport shall be subject to an annual noise quota of 7990 between the hours of 2330hrs and 0600hrs. In addition to the proposed night time noise quota, the relevant action also proposes the following noise mitigation measures: - A noise insulation grant scheme for eligible dwellings within specific night noise contours; - A detailed Noise Monitoring Framework to monitor the noise performance with results to be reported annually to the Aircraft Noise Competent Authority (ANCA), in compliance with the Aircraft Noise (Dublin Airport) Regulation Act 2019. The proposed relevant action does not seek any amendment of conditions of the North Runway Planning Permission governing the general operation of the runway system (i.e., conditions which are not specific to nighttime use, namely conditions no. 3 (a), 3(b), 3(c) and 4 of the North Runway Planning Permission) or any amendment of permitted annual passenger capacity of the Terminals at Dublin Airport. Condition no. 3 of the Terminal 2 Planning Permission (Fingal County Council Reg. Ref. No. F04A/1755; ABP Ref. No. PL06F.220670) and condition no. 2 of the Terminal 1 Extension Planning

PA Decision Date	08/08/2022
County	
Development Type	
Development Address	Dublin Airport, Co. Dublin
Appellant	
Supporting Argument	

	Permission (Fingal County Council Reg. Ref. No. F06A/1843; ABP Ref. No. PL06F.223469) provide that the combined capacity of Terminal 1 and Terminal 2 together shall not exceed 32 million passengers per annum. The planning application will be subject to an assessment by the Aircraft Noise Competent Authority in accordance with the Aircraft Noise (Dublin Airport) Regulations Act 2019 and Regulation (EU) No 598/2014. The planning application is accompanied by information provided for the purposes of such assessment. An Environmental Impact Assessment Report will be submitted with the planning application. The planning application and Environmental Impact Assessment Report may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of the Planning Authority during its public opening hours of 9.30 - 16.30 (Monday – Friday) at Fingal County Council, Fingal County Hall, Main Street, Swords, Fingal, Co. Dublin.
Applicant	
Additional Supporting Items	Yes

Aisling Reilly Patrick

From:	Bord
Sent:	Monday 11 December 2023 08:20
To:	Patrick Buckley
Cc:	Appeals2
Subject:	FW: Submission to Additional Information - sent Swift post today - ref: ABP-314485-22 - F20A/0668 Relevant Action -Section 34C of the PDA relating to night time use of the runway system at Dublin Airport.
Attachments:	Submission to Additional Information - Final 7th December 2023.docx

From: Sheelagh Morris <sheelaghmorris@gmail.com>
Sent: Friday, December 8, 2023 8:43 PM
To: Bord <bord@pleanala.ie>
Subject: Submission to Additional Information - sent Swift post today - ref: ABP-314485-22 - F20A/0668 Relevant Action -Section 34C of the PDA relating to night time use of the runway system at Dublin Airport.

Attention : Patrick Buckley Exec. Officer and Bord members

Please find attached our submission - Sheelagh Morris and Others - to follow up from printed document sent today by Swift post to arrive within the 5 week time frame
Please confirm receipt of this email and the document upon delivery.

Your website www.pleanala.ie/en-ie/case/314485 would not permit me to upload my submission without making a payment of €50 . As I have been a participant in this planning application, there is no requirement to pay the fee per your
letter dated 8th November 2023.
Considering the position, we find ourselves in, I think we should have the option of uploading our submission on line. This is most disappointing, and again, is an obstacle and barrier, to us, the appellants who are only finalising our submission, to find, we have to post it . Considering the time to deliver and the busy season coming up to christmas, I think many will miss the opportunity to submit the additional comments to the applicants Additional Information. The timing of this appeal and the process is not fair to those adversely affected, and the news of a new application to FCC to extend the passenger cap from 32million to 40million passengers.

Please confirm receipt of our submission on the AI.

Kind Regards
Sheelagh Morris
MFGM

Submission to Additional Information – Sheelagh Morris & Others - F20A/0668.

ABP314485-22

Millhead

St Margarets

Co Dublin.

- Condition 1: replaces the 65/night movement limit with an annual Night Quota Scheme, set at 16,260 QC points applicable between 23:00 to 06:69 local time
- Condition 2: amends the times when the new Runway 10L/28R should not be used (in normal circumstances) from 23:00 07:00 to 00:00 05:59

The ANCA 2022 decision and subsequent FCC Notice of Decision to Grant Permission is currently subject to an appeal process, which is ongoing

(Taken from Intervistas report – Introduction)

NOTE: ANCA is part of Fingal County Council and is not independent and there is conflict of interest by virtue of the fact that ANCA instructed FCC to grant the breach of the planning permissions and overthrow conditions 3(d) and condition 5.

Note : DAA fund the costs of ANCA , supply all the information to ANCA to make their decisions.

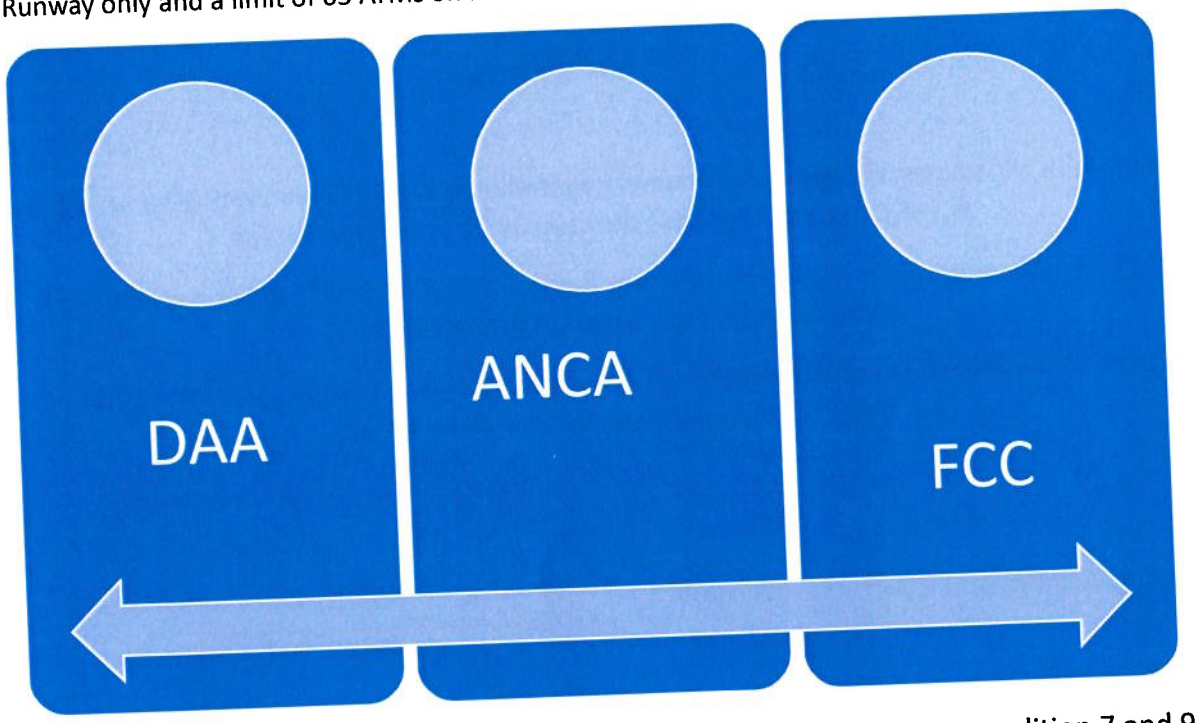
DAA – FCC and ANCA - are all the one.

DAA apply to FCC for all their planning applications – ANCA gives the OK in relation to aircraft noise and the impacts on local communities – after receiving all the information from daa – no validation – from independent source – use UK as benchmark – UK no longer part of EU – FCC grant permission

Independence of roles and authorities is conflicting and compromises the planning process and effectively places DAA above the planning system.

Each airport is enpowered to set their own NAO (Noise Abatement Objective) which

gives DAA the full power to override the flightpath victims trapped in the Longitudinal corridor. The conditions 7 and 9 were part of the planning permission for north runway for 16 hours on North Runway only and a limit of 65 ATMs on south runway.



1. Daa have proposed this Night Aircraft Quota , with no changes to condition 7 and 9 for those in the Longitudinal corridor. AQS would be reviewed every five years by ANCA and FCC – when there is a limit of a 6 months season placed on QC points, and this is at the discretion of the airport operator, how they are assigned. The AQS is not designed for those under the flightpath or parallel to the runways, as it does not consider the number of SEL's and lamax levels , envisaged to cause sleep deprivation and health issues. The contours used are the Lnight and Lday to support the noise measurements and this is not acceptable for those trapped in between the runways and under the direct flight path (the Longitudinal contour – 0 – 3000 ft) . A grant of permission would present a position of entrapment for those in the Longitudinal corridor with no solution going forward.

2. (Extract from EIAR Appendix 13A)

As part of aviation legislation, Directive (EC) 2002/49/EC of the European Parliament and of the Council of 25th June 2002 relating to the assessment and management of environmental noise, as amended by the Commission Directive (EU) 2015/996 of 19th May 2015 establishing common noise assessment methods.

The regulations are to be known as the European Communities (Environmental Noise) Regulations 2018 and came into operation on the 31st December 2018. They require the production of strategic noise maps and set agglomerations, major roads and major airports. They also require the production of subsequent action plans.

The EU introduced EU Regulation 598/2014 in 2016. This repeals 2002/Ec2 which set out procedures and rules for the introduction of noise related operating restrictions to the busiest European airports. This previous regime for managing noise airport noise placed the responsibility with the airport operator. The entry into force in 2016 of EU Regulation 598/2014 represents a shift in responsibility from the airport operator to a separate independent statutory entity or competent authority to oversee the delivery of the new, more prescriptive approach to airport noise management.

NOTE HERE : DAA were responsible for noise management at Dublin Airport.

NOTE: Dublin Airport has enjoyed the monopoly of setting their own standards on aircraft noise and other up to the present day.

There was no Restrictions enforced by the Council or by the EPA .

This is set to change with the legislation of the setting up of the ANCA (The Aircraft Noise Competent Authority) reporting to Europe under EU598/2014.

So this application is more than changing the 2 conditions and permitting 24 hour flights at Dublin Airport. The current runway will be permitted to operate 24 hours a day as they currently do.

This application is about transferring the responsibility for noise and airport activity to ANCA, IAA and ATC – should this application be granted.

The wording on the application fails to state that this is the setting up of noise regulations by daa , worded and composed by daa for the NAO as daa are the only candidate making the recommendations. This is a biased approach and does not consider those between the runways and in the flight path, where mitigation measures cannot realistically be achieved.

- **Catalytic Impacts**. The way in which the airport facilitates the business of other sectors of the economy. As such, air transportation facilitates employment and economic development in the national economy by facilitating trade, tourism, investment and productivity growth.

There is no mention of the climate change and impact of increased air traffic at Dublin Airport.

The Carbon emissions are a matter for each person who sits on an aircraft per DAA's CEO , Kenny Jacob - (interview with Clare Byrne on RTE Radio – Thursday 16th November at 11am)

Reference the words of Kenny Jacobs.

More aircraft flying – more emissions - more Environmental PM matter emitted .

Air traffic forecasts for Dublin Airport, produced August 2023, were provided by daa for the period 2023-2025.[4] These included a forecast assuming the ANCA 2022 decision and subsequent FCC Notice to Grant but maintaining the 32 million cap on annual passenger volumes ("unconstrained"), and another assuming the application of the operating restrictions specified in the 2007 planning permission as well as the 32 million cap ("constrained"). These forecasts are described further in the next section.

Daa have announced their intent to lodge planning permission on 19th December, leading up to the busiest time of the year for families , for an increase to 40 million passengers, and at time of writing, this has not been lodged. The decision by ABP has not been reached and deliberated and should not be considered while this application is pending. This is project and planning permission blending. Also an Enforcement order was lodged to the High Court with DAA receiving a stay on it and outcome still pending.

If I submitted planning for an additional extension on my home, and before the decision was made by FCC, the planning section, I then applied to turn that space into a music school, would I be permitted as DAA are , in this case. The answer we know, is no , this would not be permitted. Yet this is what DAA are doing here.

It does appear that this is a parallel strategy to have both considered and progressed together.

Where is the environmental protection, while we are in a crisis of climate change. Aircraft are not mentioned or considered, while road traffic, cows and fossil fuels are the offending destroyers. The environmental damage of aircraft is exempt in the eyes of our government , the EPA , and Europe . As our farming community have to reduce their dairy herd , - cows die while more planes fly.

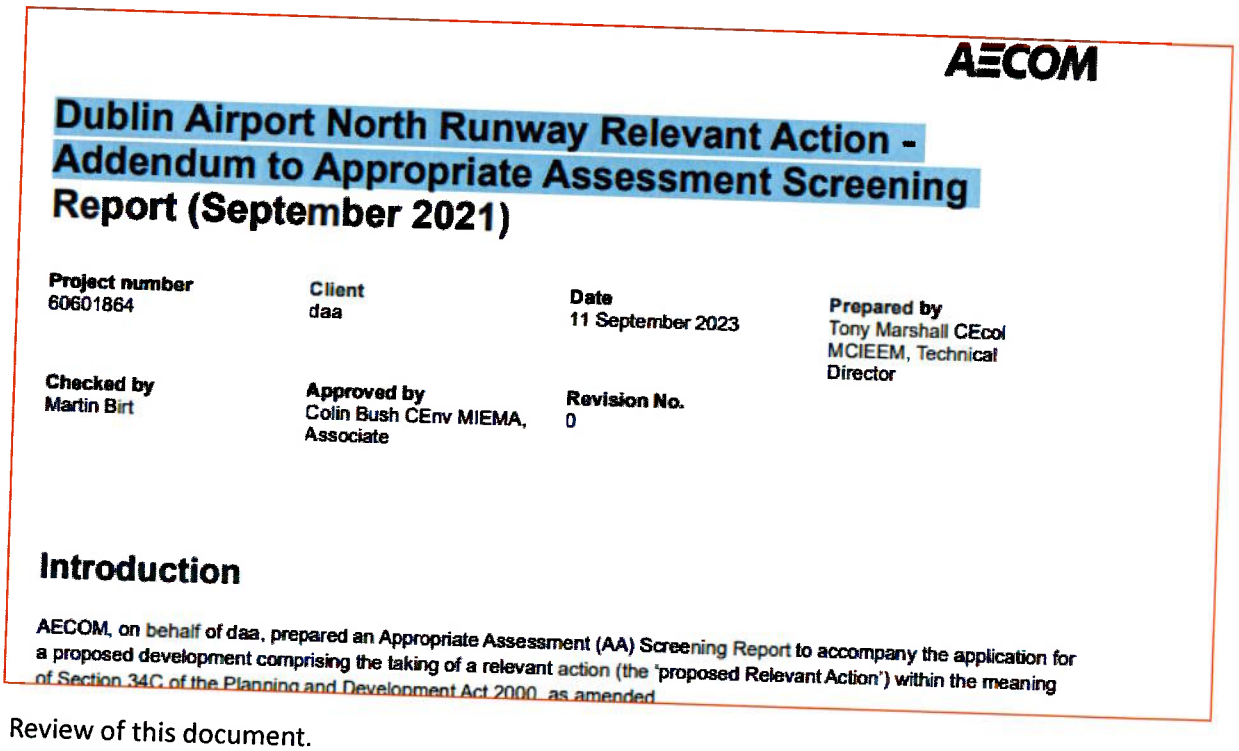
The case for creating jobs overrides the future protection of our planet and reducing emissions. The COP are meeting in Dubai currently, and the Irish Government has pledged 25million over 2 years to the countries most affected by climate change. We see Eamon Ryan returning to Dublin on a flight, for a Dail vote, on Tuesday 5th December, and will return again to Dubai to resume his presence at the COP convention. - the aircraft carbon footprint does not appear to matter to our Minister of Transport, the Green Party.

Aircraft are exempt, when it comes to our carbon emissions as aircraft are considered in a separate category under the ICAO. So from the ICAO website, we see the following:

The 2022-2025 work programme in the ICAO environmental committee (CAEP) is reviewing both the aircraft noise and the CO2 emissions standards.

(taken from the EASA website – Aeroplane CO2 emissions)

ANCA are following the methodology of the Laeq16hr contours and diminishing the significant impact of SEL (single event levels) and LaMax - slow and fast. It is the SELs that cause significant disturbance with the constant take offs at 70% of the time on North Runway



AECOM

Dublin Airport North Runway Relevant Action - Addendum to Appropriate Assessment Screening Report (September 2021)

Project number 60601864	**Client** daa	**Date** 11 September 2023	**Prepared by** Tony Marshall CEcol MCIEEM, Technical Director
Checked by Martin Birt	**Approved by** Colin Bush CEnv MIEMA, Associate	**Revision No.** 0	

Introduction

AECOM, on behalf of daa, prepared an Appropriate Assessment (AA) Screening Report to accompany the application for a proposed development comprising the taking of a relevant action (the 'proposed Relevant Action') within the meaning of Section 34C of the Planning and Development Act 2000, as amended

Review of this document.

Change to modelled flightpaths

On commencement of North Runway operations in August 2022, an issue regarding departure flightpaths was identified which resulted in some local communities being unexpectedly overflown. daa immediately started a review with the aim of satisfactorily resolving the issue as soon as possible. The review process involved engagement and coordination with the relevant stakeholders, and it identified that some of the Instrument Flight Procedures (IFPs)[1] were not aligned to modelling assumptions included in daa's planning submissions. The outcome of the review, in consultation with the Irish Aviation Authority (IAA), proposed updates to the affected IFP, specifically the current Standard Instrument Departures (SIDs)[2] which will result in flightpaths aligning more closely with the information previously communicated by daa. The revised SIDs were required to go through regulatory review and consent processes before they could be implemented. They were subsequently approved and became operational on 23 February 2023, in line with the International Civil Aviation Organisation's Aeronautical Information Publication cycle.

The changes to modelled flightpaths do not result in any European sites which were not assessed in the updated AA Screening Report being over-flown at heights at which disturbance of Qualifying Interest (QI) / Special Conservation Interest (SCI) species could occur.

This could change again – and for those in the Longitudinal Corridor, which is not recognised as a contour in the methodology used in the EIS, are collateral damage and insignificant in the eyes of the applicant.

Air traffic forecasts

In September 2021, it was forecast that a passenger throughput of 32 million passengers per annum (mppa) would be reached in 2025 in the Proposed Scenario and in 2027 in the Permitted Scenario. Due to a faster recovery from the Covid-19 pandemic than predicted, latest forecasts show that a passenger throughput of 32mppa is now likely to be achieved in 2024 in the Proposed Scenario and 2026 in the Permitted Scenario. The 32mppa Cap on permitted annual passenger capacity of the Terminals at Dublin Airport arises as a result condition no. 3 of the Terminal 2 Planning Permission and condition no. 2 of the Terminal 1 Extension Planning Permission. These conditions provide that the combined capacity of Terminal 1 and Terminal 2 together shall not exceed 32 million passengers per annum.

Table 1-1 shows the updated forecasts for the two Assessment Years in the Permitted and Proposed Scenarios.

Table 1. Air Traffic Forecasts in Assessment Years

	2025		2035	
	mppa	ATM	mppa	ATM
Permitted Scenario	31.8	227	32.0	228
Proposed Scenario	32.0	240	32.0	240

This breach in the planning has been combined with the Terminal 2 planning permission and further muddies the waters - The oral hearing for T2 was run directly after the oral hearing for F04A/1755 in 2006 and gave no time for the Resident groups to examine in depth and present a full and meaningful submission. I attended the oral hearing and felt it was a continuation of F04A/1755 and the two were intrinsic linked together for the purpose of grant of permissions.

With all the data submitted – how does the ATMs in the above Air Traffic forecasts in assessment years compare to 65 movements from 11pm to 7am on both north and south runway? This needs to be clarified.

As set out in the updated AA Screening Report, targeted field surveys carried out at Baldoyle Bay Special Protection Area (SPA) and Rogerstown Estuary SPA between June 2016 and December 2017, and in April and May 2018, were completed pre-Covid-19, at a time when Dublin Airport was operating at around 32mppa. At this time, no evidence was found of any disturbance of birds within these sites being caused by over-flying aircraft. Moreover, aircraft disturbance

No Field study done on the impact of the wild birds and wildlife in Millhead and St Margarets.

Since the new runway was built the rodent population (rats) has greatly increased and is a continuous problem . It has reached epidemic levels with rats now entering parked vehicles and farm machinery.

While winter brings vermon about, the extent of the escaltion of rats in the are area is proving continously problematic . Millhead borders on DAA lands.

Earlier Fleet Modernisation

During the period since September 2021 there has been an earlier modernisation of aircraft fleet than initially anticipated. The future forecasts now allow for the earlier fleet modernisation that has occurred and have been used in the updated assessments.

Ryanair and Aer Lingus have replaced some of their fleet which are quieter – but the noise produced as a result of ATO and ATL are not reduced enough to actually stop a sleeping human from waking or trying to get to sleep. The Boeing Max – have a reduction of 7-8 db and still registering 51 db in my bedroom on take off (ATO) Landing aircraft are much quieter, but 70% of all ATMS are take offs on the North Runway, therefore it is the take offs that wakes us and keeps us awake.

It is now the quiet month of November and it is more bearable – but from May to end of October is constant takes off every 1-2 minutes up to 12 midnight and starting at 5.30 in the morning on the South runway. The sleep deprivation is significantly harmful when one cannot get to sleep.

NOTE: North Runway operates under Mode7B which means 70% of the take offs are on 10L .

External db levels of 80-90-95 db Lafmax and lasmax and SEL are the norm.

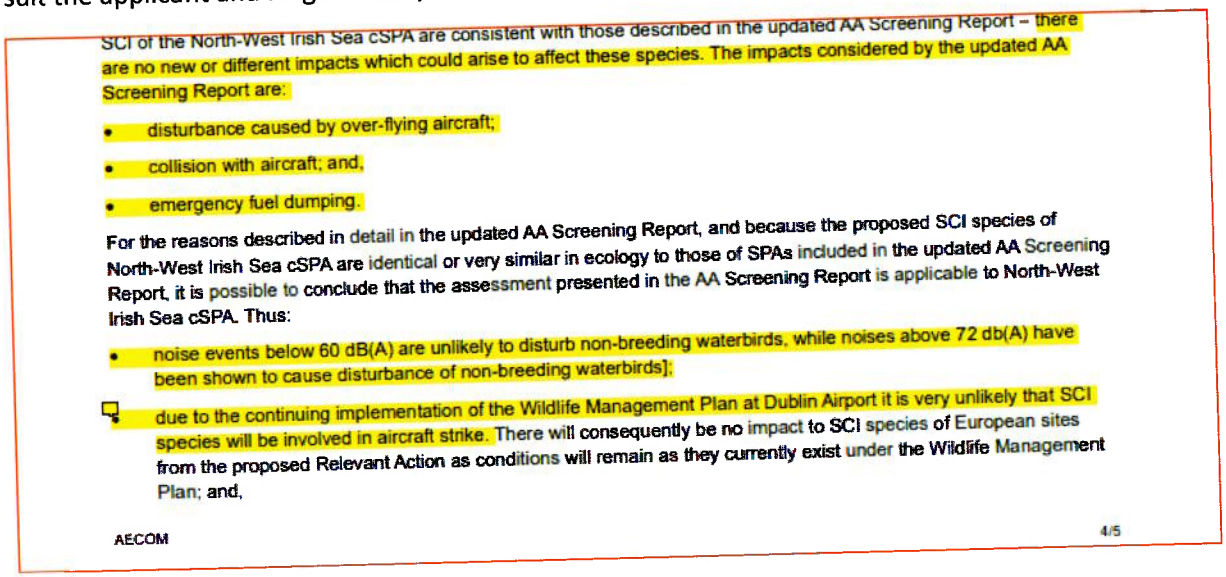
As DAA chose to use the Lnight and Lday – Laeq16hr methodology to calculate the noise levels for this planning applications to extend the operating hours from 11pm to 12pm and 6am – to 7am. These hours will be the most disturbing and busiest times for sleeping receptors, humans living under the underway and in the flightpath. There is no denying this or sugar coating it.

If I was to compare an 330 aircraft taking off at Dublin Airport, in the Laeq16hr – Lday and Lnight methodology used and every aircraft taking off for 16hrs and 8 hours at night to a chainsaw starting and stopping, - under the DAA calculations , the SELs would be hidden in an average noise level produced in the contours produced by the INM model used by the applicant.

So effectively this model states: ear protection would not be required, as the noise is spread over a wide area and averaged out. Of course we know, this is not the case, and neither is it so, for those in the direct flightpath, as aircraft take off and climb, and to a less degree, on landing. Those close to the runway are far from the same as those at the other end of the contour lines drawn.

For 9 months of the year – the constant aircraft noise is unbearable. The Insulation scheme and Voluntary Purchases Scheme was part of the planning permission . Daa and FCC agreed both of these schemes – excluding the views of those adversely impacted. It must be noted here, as per my

original submission - 14 families , residents of Fingal, living at Dublin Airport were exempt from the Voluntary Insulation and Voluntary Home Buy Out Scheme and were treated separately, and their issues dealt with to their full satisfaction, not on the terms of a restricted and interpreted wording to suit the applicant and Fingal County Council.



SCI of the North-West Irish Sea cSPA are consistent with those described in the updated AA Screening Report – there are no new or different impacts which could arise to affect these species. The impacts considered by the updated AA Screening Report are:

- disturbance caused by over-flying aircraft;
- collision with aircraft; and,
- emergency fuel dumping.

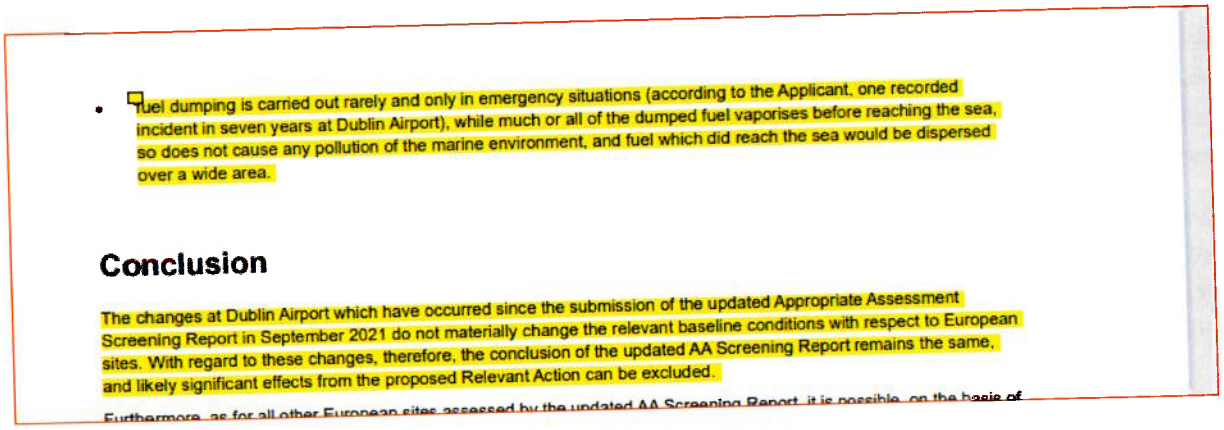
For the reasons described in detail in the updated AA Screening Report, and because the proposed SCI species of North-West Irish Sea cSPA are identical or very similar in ecology to those of SPAs included in the updated AA Screening Report, it is possible to conclude that the assessment presented in the AA Screening Report is applicable to North-West Irish Sea cSPA. Thus:

- noise events below 60 dB(A) are unlikely to disturb non-breeding waterbirds, while noises above 72 db(A) have been shown to cause disturbance of non-breeding waterbirds];
- due to the continuing implementation of the Wildlife Management Plan at Dublin Airport it is very unlikely that SCI species will be involved in aircraft strike. There will consequently be no impact to SCI species of European sites from the proposed Relevant Action as conditions will remain as they currently exist under the Wildlife Management Plan; and,

AECOM 4/5

What is the wildlife Management plan for St Margarets and Millhead?

Since the new runway opened the wildbird population is practically non existent. The increase in the rat population has denied us the opportunity to encourage the wild birds to stay in the garden and this has a negative affect on mental health and well-being. The garden is not recognized by daa is a vital part of our homes - it was stated – we will lose our gardens and this became a mantra to justify the loss of our outdoor room.



- fuel dumping is carried out rarely and only in emergency situations (according to the Applicant, one recorded incident in seven years at Dublin Airport), while much or all of the dumped fuel vaporises before reaching the sea, so does not cause any pollution of the marine environment, and fuel which did reach the sea would be dispersed over a wide area.

Conclusion

The changes at Dublin Airport which have occurred since the submission of the updated Appropriate Assessment Screening Report in September 2021 do not materially change the relevant baseline conditions with respect to European sites. With regard to these changes, therefore, the conclusion of the updated AA Screening Report remains the same, and likely significant effects from the proposed Relevant Action can be excluded.

Furthermore, as for all other European sites assessed by the updated AA Screening Report, it is possible, on the basis of

While fuel dumping is carried out over the Irish Sea (contaminating the fish population) there is a risk at the end of the runways and in the direct flight path that fuel dumping could be an event that will occur. Thankfully and hopefully this will never be the case. However this raises another issue, what is the PM (particle matter) at the end of the runways and surrounding area and in the direct flight path on take off and landings. One can see the plume line of emissions from the wings of the aircraft in weather conditions, in the sky as they come in to land and also on take off. There is no station set up by the EPA in St Margarets to monitor the air quality . There is a need now that the new runway is operating, in the interest of the health of those trapped in the flightpath with no satisfactory options.

This morning, Sunday 3rd December, the odour from aviation fuel was in the atmosphere from early morning to lunch time (9am – 1300) The weather conditions – it was very foggy and the fumes and odours remained trapped in the air. What is the PM levels this morning? There is no way of capturing this.

RICONDO®

September 2023

Dublin Airport

North Runway, Regulation 598/2014 (Aircraft Noise Regulation) Cost-Effectiveness Analysis Updates

Prepared for:

daa

Prepared by:

RICONDO

6. OPERATING RESTRICTION MEASURE

Scenario 2 with the addition of the proposed 55 dB Lnight RSIGS for people exposed to high level of impact caused by night-time noise levels above 55 dB Lnight continues to meet the cNAO and priority associated with reducing high level night-time disturbance. Therefore, operating restriction measures are not necessary.

ANCA are responsible for ensuring that aircraft noise is controlled for those adversely impacted . To date ANCA have made their recommendations to increase the Noise Quota Count while ignoring those trapped in the flight paths . ANCA have been directed not to take into consideration the current VHIS or the VHPS as agreed by DAA the applicant and FCC the local authority – excluding those homes and lives , with their quality of life destroyed and health impacts changed forever – denying a nights sleep and evening rest to residents at the end of the runways and between the two runway.

7. COMPARISON OF FORECAST INCLUDING ADDITIONAL MEASURES AND PERMITTED OPERATIONS SITUATION SCENARIOS

Section 7 of the 2021 CEA Report describes the comparison between the Scenario 2 with the Residential Sound Insulation Grant Scheme (Forecast Including Additional Measures) and the Permitted Operations Situation scenario that includes the North Runway restrictions:

- Condition 3(d) – Runway 10L-28R shall not be used for take-off or landing between 23:00 and 07:00.
- Condition 5 – The average number of night-time aircraft movements at the Airport shall not exceed 65 per night (between 23:00 and 07:00) when measured over the 92-day modelling period.

The purpose of the comparison was to evaluate which of the two is more cost-effective to address the same cNAO and related priorities.

7.1 EFFECTIVENESS COMPARISON

Revised Table 7-1 presents the HSD and HA populations for the Forecast including Additional Measures scenario and the Permitted Operations Situation scenario. **Revised Table 7-2** compares the metrics of the two scenarios to the 2018 situation. Both the Forecast including Additional Measures and Permitted Operations Situation scenarios reduce the HSD and HA populations. Based on the updated results, both scenarios continue to meet the cNAO and associated night-time disturbance priorities.

REVISED TABLE 7-1: SCENARIO POPULATION EXPOSURE LEVEL RESULTS

SCENARIO	HIGHLY SLEEP DISTURBED POPULATION	HIGHLY ANNOYED POPULATION
Forecast including Additional Measures	23,790	53,762
Permitted Operations Situation	22,250	54,998

SOURCE: Bickerdike Allen Partners LLP, *A11267_23_CA029_3.0 Summary of Results Including Mitigation*, September 10, 2023 (population values).

We see the conditions set up - no ATMS on North runway from 11pm to 7am

And only 65 ATMs on 10R-28L - this has not been adhered to by DAA since the opening of North Runway on 23rd August 2022 and FCC only issued an enforcement notice – 11 months after the breach , which was highlighted continuously . This is a matter for the courts now – and we see the courts have permitted a stay on this , to continue to breach the conditions.

The conditions are the conditions and are there to protect the amenity of the local community surrounding the runways and flightpaths.

Looking at the above table – there is an increase in HSD of 1,540 and Highly Annoyed population of an additional 1,236 - can DAA guarantee 40db at night SEL and LAFmax and LASmax to those HSD and HA populations – This is also a responsibly of ANCA under the NAO in line with 598/2014 regulations. Each airport is permitted to set their own NAO and this is submitted as the END to the European Union . Dublin Airport must abide by its responsibilities and direct airlines to comply.

The Scheme rates all aircraft types according to their respective noisiness of landing and and take-off using a measure called EPNdB 'effective perceived noise' in decibels. Band of EPNdB are assigned a Quota Count (QC) rating, this being done on an exponential scale.

For each reduction of 3 in EPNdB the QC is halved:
EPNdB over 101.9 is QC/16
EPNdB 99 – 101.9 is QC/8
EPNdB 96 – 98.9 is QC/4
EPNdB 93 – 95-9 is QC/2
EPNdB 90 – 92.9 is QC/1
EPNdB less than 90 is QC/0.5
EPNdB less than 87 is exempt (ie QC of zero).

Figure 3.2 illustrates the historic trend in certified aircraft noise levels in terms of the cumulative 25 margin to the Chapter 3 limits for the heaviest weight variants and maximum thrust rating for an aircraft type(5) Aircraft designs certified during the last 10 years (e.g. Boeing 737max, 787: Airbus A320neo, A350, A330neo) have a cumulative margin of 5 to 15 EPNdb below the latest Chapter 14 standard. The general trend over the last three years has seen marginal noise improvements to these aircraft designs.

(taken from EASA website)

What I see above again is different aircraft noise counts that add further confusion to identifying and standardising what is aircraft noise. For me, it is the event that wakes me, that prevents me from sleeping and going back to sleep, once sleep disturbed.

The airlines Ryanair and Aer Lingus are banking on the Noise quota system to fly as many aircraft as they want when most of these will be in the EPNdb less than 87 – NQC of ZERO

Yet for me and my family, waking up with each take off and more and more of them will not be ZERO

The report on waking from sleep – when one cannot get to sleep – that is the bigger issue here.

Revised Table 7-3 presents the cumulative costs for the Forecast including Additional Measures scenario and the Permitted Operations Situation scenario. Costs for the Forecast including Additional Measures scenario are the combined sum of the preferential runway use measure costs listed in Table 4-5 of the 2021 CEA Report and the revised RSIGS costs summarised in Revised Table 5-2. The cumulative cost for the Permitted Operation Condition scenario is based on updated figures provided by InterVISTAS for over the three-year period between 2023 and 2025.

REVISED TABLE 7-3: ESTIMATED TOTAL COST COMPARISON TO IMPLEMENT – FORECAST INCLUDING ADDITIONAL MEASURES VERUS PERMITTED OPERATIONS SITUATION SCENARIOS

SCENARIO	CUMULATIVE COST 2025
Forecast including Additional Measures[1]	€3,833,525
Permitted Operations Situation [2]	€842,000,000

NOTES:
1 Forecast including Additional Measures scenario cost estimate is expressed in constant prices.
2 Permitted Operations Situation scenario costs are in 2020 euros.
SOURCES: Ricondo & Associates, Inc., September 2023 (sum of costs for Forecast including Additional Measures scenario); InterVISTAS, August 2023 (InterVISTAS_EconImpact_Update_30Aug2023.xls) (total gross value-added cost estimates).

7.2 COST TO IMPLEMENT COMPARISON

Costs associated with the Permitted Operations Situation scenario are related to the constrained number of movements forecast for 2023 to 2025 due to the North Runway operating restrictions compared to unconstrained levels up to 2025, which is when the 32 mppa is expected to be reached. The updated movements forecast conducted by Mott MacDonald indicates the 32 mppa level is expected to occur in 2024 after which there would be no growth in passenger volumes.[1] An updated economic impact study conducted by InterVISTAS based on the updated forecast movement conditions conducted by Mott MacDonald determined the constrained number of movements would lead to loss in value of goods and services produced (gross value added [GVA]) compared to the unconstrained scenario. All costs are expressed in 2022 prices.[2]

What is the human cost of lack of sleep – unable to sleep , dreading the summer season from May to October when the schedule of ATMS are taking off every minute,during the day – the loss of our gardens, then the Christmas period and Easter Period.

What is the human cost to each individual living at the end of the runways and in the immediate flight path. The commercial cost is quantified and pushed forward to diminish our health and the mental impacts . The CEO Kenny Jacobs , when asked by Clare Byrne on her radio show on 16th November, stated there were some homes he would not live in – but yet the Voluntary insulation and Home Buyout scheme does not reflect the true cost of the collateral continuous damage of DAA and their runway and operation of Dublin Airport.

The human cost for those trapped in the Longitudinal Corridor has not been quantified and we are calling for this to be done – in the interest of fairness and equality

InterVISTAS indicated that as a result of the operating restrictions, the Irish economy could forgo an additional 3,130 jobs and €256 million in GDP by 2024, relative to the night operations with the ANCA June 2022 conditions. The forgone economic impact is projected to decline in 2025 as the 32 mppa cap starts to reduce the gap between the forecast scenarios. By 2025, the forgone economic impact is estimated to be 1,510 jobs and €122 million in GDP. The economic impact results are lower than estimated in 2021 due to the narrower gap between the unconstrained and constrained forecasts.

There is no costing from InterVISTAS on the cost to home owners, the impact on their lives, over time, with constant and significant life changing , stuck or having to move, find a replacement home, and all the costs associated with that. Also the stress of moving, finding a replacement home and fact is, you will never find another home , like what you have. The cost of adapting , new neighbours, new community, longer and more expensive commuting to work, hospitals and menities.

It must be noted those impacted in St Margarets are natives of three generations, as is my case and our Identity and sense of belonging is in St Margarets . Dublin Airport have invaded and taken our quality of life and continue to do so, as an entitlement for the same of profits and Commercial gain .

The national strategic importance of this application has been the justification to ignore the conditions that impact on those in the flightpath , to use the media to change the mindset of the public , isolating those victims adversely affected and demonizing them. The CEO of Ryanair has continually demonized those residents adversely affected, in a deliberate campaign , accusing them of holding the county to random and the airlines. The profits is the most important goal for Ryanair and Aer Lingus for their shareholders - seats on planes are a commodity – the human factor is over shadowed by the greed for increased profits and expansion at the cost of human misery and constant torture.

2035[3]. The proposed Relevant Action does not seek any amendment of conditions of the North Runway Planning Permission governing the general operation of the runway system (i.e., conditions which are not specific to night-time use, namely conditions No. 3(a), 3(b), 3(c) and 4 of the North Runway Planning Permission) or any amendment of permitted annual passenger capacity of the Terminals at Dublin Airport. Condition No. 3 of the Terminal 2 Planning Permission (PL 06F.220670) and condition No. 2 of the Terminal 1 Extension Planning Permission (PL 06F.223469) provides that the combined capacity of Terminal 1 and Terminal 2 together shall not exceed 32 million passengers per annum (mppa) ('the 32mppa Cap'). As such the updated forecast schedules maintain the 32mppa Cap as a restriction.

The original forecasts saw passenger numbers reaching 32mppa by 2025 without the RA. The changes in the revised forecasts principally relate to the time when the 32mppa cap is reached, i.e. 32mppa will now be reached sooner than was previously estimated. As a result of the quicker return to growth now forecast, both the previously submitted *Economic Impact Assessment*[4] by Intervistas and the *Cost-Effective Analysis*[5] by Ricondo have been updated to provide ABP with the most up to date and current information.

The general operation of the runway excluded the use of the North runway from 11pm to 7am in the morning and also reduction to 65 ATMS on South runway. Every ATM is part of the operation at Dublin Airport as it involved the IAA, ATC, Air Nav, ANCA , FCC and Government departments , Finance (the main shareholder) Transport and justice and Housing.

To state that it is not, is incorrect information and is a coercion statement to mislead and change the mindset into **saying what is not ok is now ok.**

Single Event Levels and Lamax are not cancelled out with Noise quota system

The relationship between the Noise quota system and SELs and ATMs could not be further from each other.

From Tom Philips report.

Earlier Fleet Modernisation During the intervening period between the previous RFI submission on 13th September 2021, FCC's Notice of Decision to Grant Permission on 17th October 2022 and the submission of this response to ABP, the modernisation of the fleet at Dublin Airport has advanced at a quicker rate than initially anticipated.

This has been captured within the various supporting materials provided with this response. The updated assessment is based on the latest forecasts. These take account of changes in the fleet mix over recent years and how it is expected to continue to evolve. This means the forecasts allow for earlier fleet modernisation that has occurred, compared to what was previously forecast based on conservative assumptions.

Our study predicts that the current G1 aircraft types will be largely replaced on a phased basis by next generation G2 types by the mid 2030's. New next generation aircraft types (G3) are expected to enter service potentially from the late 2030s to replace G2 types, but no G3 types are assumed by 2040 at DUB

FCC granted permission to remove Condition 3 and 5(d) on 17th October 2022 less than 2 months after the new runway opened for operation. While the fleet mix has changed, this will not be completed for a number of years and thus enabling the airlines to operate as they wish, until such time their capital budgets permit such a change. The period of time to produce aircraft for delivery is also a factor. The cost of an aircraft is excessive and airlines will be slow to change their fleets until the cost of repair and maintenance exceeds the cost of replacement . Kenny Jacobs stated on the Clare Byrne Show on 16th November that discounts are offered to airlines for quieter aircraft. There are no PENALTIES only discounts - so Airlines can continue to operate their fleet as long as it suits them.

The price tag on an A330neo new aircraft is $238.5 million with the freighter version costing $259.9 million The A330 -800 as we know, is very rare, with only 14 on order. The A380 – list price $446.5 million and discounted with fleet orders. Emirates have ordered 21 of these. So the cost of changing will only happen when the airlines are ready to order. That leaves the flightpath residents to experience torturous aircraft noise on a continuous basis in the Longitudinal Corridor. DAA have stated and want the NQS which they say is a far better way of measuring noise. It is not for us flightpath residents - the increased NQS granted by ANCA means no limit to the number of aircraft taking off and landing on the North runway and South runway.

A noise quota system is proposed for night time noise at the airport. The airport shall be subject to an annual noise quota of 7990 between the hours of 2330hrs and 0600hrs. In addition to the proposed night time noise quota, the Relevant Action also proposes the following noise mitigation measures: - A noise insulation grant scheme for eligible dwellings within specific night noise contours – A detailed Noise Monitoring Framework to monitor the noise performance with results to be reported annually

to the Aircraft Noise Competent Authority (ANCA), in compliance with the Aircraft Noise (Dublin Airport) Regulation Act 2019

ANCA have now issued their decision, (Draft Regulatory Decision). ANCA have not only considered the requests, but went far and beyond the request, permitting 16,260 noise Quota counts between 2300pm – 6.59 am (8,270 in excess of what was requested) and now the subject of this submission. This consultation is just another process that will be logged and submissions from the victims ignored, as part of the planning process to justify the outcome and a mere tick box exercise.

So 16,260 ATM will be permitted from 11pm to 7am ranging from 90db upwards. Any below that, are free. So as many of the Ryanair Boeing -800 max can fly without any issue – with the take off noise disturbing the night time peace for sleeping and resting residents.

Daa sought the approval from ANCA to change the night time hours, imposed by ABP , based on an economic reason to trample on those adversely affected, in terms of health and well being.

The Noise Quota system - aircraft do not register in the count under 87db and only register in the count at 90db. **This is set by the aircraft manufacturer** – so Boeing set the level acceptable for Boeing aircraft and Airbus set the level for Airbus aircraft – not ANCA, not FCC not the EPA .

The Scheme rates all aircraft types according to their respective noisiness of landing and and take-off using a measure called EPNdB 'effective perceived noise' in decibels. Band of EPNdB are assigned a Quota Count (QC) rating, this being done on an exponential scale.

For each reduction of 3 in EPNdB the QC is halved:
EPNdB over 101.9 is QC/16
EPNdB 99 – 101.9 is QC/8
EPNdB 96 – 98.9 is QC/4
EPNdB 93 – 95-9 is QC/2
EPNdB 90 – 92.9 is QC/1
EPNdB less than 90 is QC/0.5
EPNdB less than 87 is exempt (ie QC of zero).

A limit is placed on the total number of QC points per 6 month season (how these are assigned per night is at the discretion of the airport operator). Thus under a pure quota count system, if planes rated at 96 EPNdB were replaced with planes rated at 95 EPNdB, twice as many could be flown during the restricted period.

The environmental objective is to keep within a given 'average noise' limit for the whole night, measured in Leq. Leq stands for Level equivalent and is calculated by adding together the noise energy of all the noise events across a given time period and then taking the continuous level (ie. It irons out the peaks and troughs).

An extreme case will illustrate the way Leq works. One concorde on departure had equivalent noise energy to 120 Boeing 757s – so one [Boeing 757] plane every 2 minutes for 4 hours, produced the same Leq as 2 mins of concorde followed by 3 hrs 58 mins of silence.

There is no official noise index for showing night noise in the UK (although Leq is officially recognised during the day period between 0700 and 2300). However, the Government

believes that producing 'noise maps' for airports at night using Leq contours is an adequate way of expressing aircraft noise, and has produced maps for the London airports in its recent consultation on the night noise regime.

As a group of victims trapped in the Longitudinal Corridor, we have no confidence in ANCA that the balanced approach is administered and the scales leaves us up in mid air,

DAA have all the weight behind them with ANCA as DAA control ANCA and part of FCC.

Residents have no say, and are insignificant. The Inspectors at the oral hearing in 2006 recogised the very real and significant negative impact on those in the Longitudinal corridor and recommended that the construction of North runway be refused.

Report on awakenings as a response to noise during sleep

5 September 2023

Note with respect to noise effects on health

Night-time use of the runway system at Dublin Airport

Reference to the Relevant Action Revised EIAR (September 2021)

ABP-314485-22

F20A/0668

DAA PLC

by ***Prof. Dr. Thomas Penzel (Charité Berlin, Germany)***
Prepared for ***Tom Phillips + Associates***

RFI item 1

Item 1 of the RFI request states the following:

> *The assessment in the EIAR of the effects of noise from ATMs at night (2300 to 0700 hrs) is based on energy averaging noise metrics over relatively long periods e.g. 8 hrs, correlated with the percentage of the exposed population likely to self-report being highly sleep disturbed (%HSD), assessed with a standardised scale based on the guidance in the World Health Organisation's (WHO) Environmental Noise Guidelines 2018. (WHO ENG 2018)*
>
> *However, 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 a receptor.*
>
> *The EIAR includes information on peak LAmax noise levels from ATMs and the number of these events at night in terms of the N60, N651 noise contours for the 92 day summer average of ATMs and airport modes, and the N60 metric and LAmax2 for the single modes of airport operation. But these data are presented for information purposes only and there is no analysis of the effect of peak LAmax noise levels from ATMs on additional awakenings at night regarding the baseline and consented scenarios.*

> *You are requested to assess the probability of additional awakening due to the peak LA,s,Max of ATMs at night between 2300 and 0700hrs for the 92 day summer average of ATMs and airport modes, and for the single modes of airport operation 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 (Environmental Noise Guidelines for the European Region: A Systematic Review on Environmental Noise and the Effects on Sleep - International Journal of Environmental Research and Public Health).*

Extracts from Future Development 11 pages – Additional Information.

22.1.2 Accordingly, in circumstances where there is a long-term policy to expand Dublin Airport as a whole, it is considered appropriate that the competent authority assessing the proposed Relevant Action would have an overview of those longer term plans, so that the proposed Relevant Action can be viewed and assessed in that wider context, with account being taken of planned future development at Dublin Airport as appropriate and as far as practically possible at this stage.

22.1.3 There are development proposals currently being prepared which will seek planning permission for future airport growth to 40 mppa. These will include proposals for airport infrastructure required to accommodate this growth. These future development proposals will require a grant of planning permission in order to be realised, which in itself will entail planning and environmental impact assessment. The proposed Relevant Action is a standalone proposal and is not reliant on future airport growth in order to be realised.

22.1.4 Equally, future airport growth can occur (subject to planning being granted) in the absence of the proposed Relevant Action. Notwithstanding the independence of the proposed Relevant Action, an awareness of future airport plans is relevant in considering the proposed Relevant Action given the potential for interaction in the future. In this respect, this chapter is intended to give an overview of future development plans so that, consistent with the purpose of the EIA Directive and case law, account be taken of those future plans in the context of the assessment of the environmental effects of the proposed Relevant Action.

22.1.5 The future development plans discussed in this chapter do not form part of the proposed Relevant Action, nor is this chapter intended to undertake an EIA of these future development plans. Such an EIA is neither possible nor required at this stage; the environmental implications of such future projects will be fully assessed in future when consent is sought for them; they will be the subject of planning application(s) with any relevant supporting environmental information.

22.1.6 Since this chapter was originally written in 2021, the Infrastructure Application (IA) which will seek planning permission for future airport growth to 40 mppa has evolved and the infrastructure designs have been advanced in preparation for a planning application in Q4 of 2023. Whilst the EIAR for the IA is still work in progress, it is now possible to provide more certainty around the likely impact of this and other future development plans which have also progressed in the last two years. This chapter has been updated to reflect the more detailed information now available.

In 22.1.4 Notwithstanding the independence of the proposed Relevant Action, an awareness of future airport plans is relevant in considering the proposed Relevant Action given the potential for interaction in the future – where is the interaction for those HSD?

It is very clear from the above, from the get go, that T2 and the North Runway were one planning application, spilt into 2 parts and now, being brought from to one project.

Of course, the submission to remove condition 3 and 5(d) with the change in the Planning Act to permit a "Relevant Action" to cherry pick the two most important conditions is not acceptable to us the residents, those significantly adversely affected now considered collateral damage .

The actions of DAA, FCC and Dept of Transport, Justice and Finance, - all the owners, the shareholders of Dublin Airport and the full backing of the airlines , with no penalties , no convictions for creating serious health and mental problems, as a result of their actions.

The Voluntary Insulation programme has yet to be proved successful for those homes that have received it. No independent calibration has been carried out – and does not give those in line for insulation, confidence in the scheme. The voluntary insulation is a text book solution to tick the boxes. The failure to insulate homes, with the loss of our gardens , will in time, result in legal action. The guidelines have been set and must be adhered to with the WHO guidelines of 40db LAMAX - LAfmax and LAsmax.

Table 22-1 Potential Environmental Effects of the Infrastructure Application

Environmental Factor	Potential Demolition Effect	Potential Construction Effect	Potential Operational Effect	Comments
Population and Human Health	Unlikely to be significant	Likely to be beneficial employment effects	Not yet known	There is the potential for the future airport developments including the IA to have beneficial effects from airport operations, construction and supply chain jobs created due to increased spending in the local area by employees. There is also potential for loss of amenity associated with traffic, noise, dust and vibration during construction, however this would be minimised through the introduction of construction environmental management and construction traffic management measures. Effects upon the actual and perceived physical and mental health and well-being of local residents are possible, owing to additional air traffic movements associated with an increase to 40mppa. This is not easy to quantify at this stage; although the number of passengers passing through the airport would be 25% higher than in 2018 this would not necessarily translate into 25% more flights, and aircraft in future are likely to be quieter than at present. Noise impact predictions for the proposed Relevant Action show that in general the overall noise exposure numbers reduce in 2035 compared to 2025 due to this modernisation effect.
Traffic and Transport	Unlikely to be significant	Likely to be adverse effects from construction traffic	Unlikely to be significant	Traffic around the airport is likely to increase as a result of construction traffic and operation of a 40mppa airport, however the intention, agreed with stakeholders, is to reduce the impact through the introduction of more sustainable transport options such as BusConnects and Metrolink and implementation of the campus Mobility Management Plan. A traffic impact assessment is being undertaken to determine the effect and will be included in the documents submitted with the Infrastructure Application.
Major Accidents and Disasters	Probably none	Probably none	Not yet known	A modelling exercise has been undertaken to determine the effect of changes to the number of operational air traffic movements.
Air Quality	Unlikely to be significant	Unlikely to be significant	Unlikely to be significant	There is potential for increase in public exposure to short-term concentrations of small particles and pollutants most commonly associated with road traffic emissions during construction. Dust from vehicle track-out may also occur. Construction impacts would be managed by a CEMP. There is potential for increase in public exposure to pollutants most commonly associated with combustion during operation of the IA, but the likelihood is that there would be little change in assessed air quality if the airport was operating at 40mppa. However, the data to undertake the modelling is not currently available. An air quality model will be prepared for the IA in due course.
Noise	Unlikely to be significant	Unlikely to be significant	Not yet known	Noise from the airport operating at 40mppa would be expected to increase given the growth in air traffic movements and changes in aircraft movements on the ground, taxiing and engine testing. Overall noise effects are likely to reduce over time as the fleet is modernised and remain within the quota count defined by Aircraft Noise Competent Authority (ANCA) in their Regulatory Decision (or an Bord Pleanála on appeal). There is likely to be a point between 2025 and 2034 where aviation noise would reach a peak (within the quota count) owing to the increase in ATMs towards 40mppa; however fleet modernisation will offset this impact and will eventually reverse the trend. The exact year where this will occur is not yet known.
Climate and Carbon	Not yet known	Not yet known	Not yet known	Scope 1+2 carbon emissions from the airport operating at 40mppa would tend to increase, however this would be offset by measures in the Applicant's CRS and incorporated in the IA. The exact balance between these effects is not clear at present but could be expected to represent an improvement overall in the medium term, in line with the CRS and government policy.
Landscape and Visual	Unlikely to be significant	Unlikely to be significant	Unlikely to be significant	Unlikely that there would be significant landscape or visual effects as development would be primarily confined to the airport campus.

As we look at the above AECOM admit the impact of aircraft noise on the communities , but it is ok as the fleet modernization will offset tine impact and eventually reverse the trend . THE EXACT YEAR WHERE THIS WILL OCCUR IS NOT YET KNOWN>

OVERALL NOISE EFFECTS ARE LIKELY TO REDUCE OVER TIME AS THE FLEET IS MODERNISED AND REMAIN WITHIN THE QUOTA COUNT DEFINED BY ANCA IN THEIR REGULATORY DECISONS ON AN BORD PLEANALA ON APPEAL.

So the Noise quote count is going to make it all right for those trying to sleep at night in the direct flight path – As stated already, many of the aircraft will be under the radar, as the bar is set at 90db. So as many as possible can be flown by the airlines and the victims trapped will be considered insignificant.

22.6.2 The future development plans discussed in this chapter do not form part of the proposed Relevant Action and would all require further consents (and environmental assessments as required) before they can be implemented.

So the future development of Dublin airport do not form part of the proposed Relevant Action , so why is it being discussed and part of this Additional Information – this is to

influence the Bord to consider this application F20A/0668 is a part of the full Dublin Airport project - which is not at all fair to the appellants, those suffering misery in the summer, and holiday periods with constant nonstop, take offs from north runway (70% Mode 7b)

I appeal to the Bord to please consider the humans affected - as the solutions in place do not reflect the significant life-changing affect of an invasion of aircraft, 24 hours a day .

AIR NOISE & VIBRATION - Additional Information.

13.3.28 - There is no clearly accepted method of how to rate the magnitude of the effect of a change in the absolute air noise level and the associated change in noise level.

The applicant uses the UK Planning practice Guidance. I can assure the Bord , during the summer, with Aircraft taking off from North runway, registered 90db and over 90db LAfmax outside in my garden and these aircraft take off every 2 minutes. The actual experience for homes in the flight path is truly torturous and mentally debilitating . As I mind my young grandchildren, and teach music lessons , this is not the environment suitable for learning and development. **The fact an oral hearing was not permitted on this appeal , and following the oral hearing in 2006, the Inspector had access to the audio noise of the aircraft and recommended the refusal of the construction of the runway, based on the human health impacts.**

Now we see this totally ignored, an oral hearing denied , by those directly impacted, and a decision by the Bord to follow, knowingly aware of this, will grant to the applicant, dominance, superiority, and an unfair advantage in this application to ABP.

Since 2007 on the grant of permission by ABP with 31 conditions, DAA have continually undermined the conditions and blatanty ignored the importance of the planning laws – from 2007 to date. The late action of FCC , 11 months after the opening of the north runway in serving an Enforcement Notice makes it all the more wrong.

Those adversely impacted were protected by condition 3(d) and condition 5 and also with condition 7 and 9 , to include a voluntary Insulation Scheme and Voluntary Home Purchases Scheme . It is ironic that ANCA have been appointed the Noise Regulator for Dublin Airport by the government – (part of FCC but supposed to be independent) and answer to DAA who fund ANCA through FCC.

ANCA fully agreed to the application F20A/0668 and even granted over double the Noise Quota counts, to permit unlimited aircraft to fly from Dublin Airport. Then FCC granted DAA the permission, with an Enforcement order, following pressure from affected residents and councillors, after that – which in itself is contradictory.

The plight of those suffering torturous aircraft noise, with the alternatives for some, not acceptable, and others with no alternatives, is now in the hands of ABP.

The Statement of Need provided by the Applicant States the external noise at Millhead is 67.2 db Laeq 16hr – but no Lamax levels were taken.

daa

DUBLIN AIRPORT
NOISE INSULATION PROGRAMME

Statement of Need

Anderson Acoustics

Building ID	35577761
Address	Millview, Millhead, St. Margaret's, K67 A364
Conservation area	No
Protected structure	No
Dwelling description	A detached house comprising a kitchen, living room, conservatory extension, utility room, 2 bathrooms and 4 bedrooms on the ground floor and a living room and loft conversion on the first floor. The external walls are formed of dense concrete block throughout the property. The existing glazing is aluminium frame throughout with 4/12/4 mm double glazing in all rooms. The conservatory contains two double glazed Velux windows. The roof is pitched and formed of concrete tiles . A fireplace is present in living room. Passive through-wall vents are present in all bedrooms, living room and utility room.
Security Alarm System	No
Roof Void	Approx thickness existing insulation: 100mm Access hatch(s) to all roof voids: Yes
Areas of building not covered by noise mitigation upgrade works	
External noise level	67.2 dB $L_{Aeq,16hour}$ (from Noise Model: 2022. summer noise levels at dwellings)
Owner	Sheelagh Morris
Statement of Need	An assessment has been carried out to determine the specification of products available under the daa Noise Insulation Programme that are most suitable for the property. These are detailed on page 3.

Note the External noise level of 67.2db Laeq 16hr (from noise model 2022 Summer noise levels at dwellings)

The actual noise level in my garden was from 80 – 96db - LAfmax. The noise levels inside my bedroom currently, taken from the APP – Disabel X - 69-70 db LAfmax.

In the RNIS – Condition 7 – the document states on page 11

"However in some instances where the elemental analysis demonstates very high level of noise insulation is already being provided by the existing building construction this improvement may not be possible

It also states:

Where the Statement of Need states that the minimum target of 5db cannot be achieved then the owner will have access to a third party review by a qualified acoustician paid for the daa. The acoustics report will be taken into account in refining the Statement of need for that individual dwelling.

The home buyout for those in the direct flight path , with a market value plus 30% is not covered in this Additional information and does not reflect the value of ones life, identity, place of belonging, community and replacing a forever home that is now taken, with the outdoor room, the most important room, the garden.

The costing of the human disturbance has not been factored in.

Conclusion.

DAA are seeking to remove Conditions 3(d) and Condition 5 from PL06F.217429 - F04AA/1775 . These conditions are part of the 31 conditions issued to permit the construction of the runway. There are the conditions to be adhered to – to protect the amenities of those in the flightpaths. This has not been the case with a stay now in place on the 65 movements by the High Court.

The information submitted and additional information, repeating what has already been submitted, does not

eflect the impact of the actual SELs, the peak Lamax on the HSD population.

The additional information focuses the minds of ABP on the awareness of the future of Dublin Airport – i.e to increased the cap from 32m to 40million pax. This planning application is being submitted on 19th December – ironically the same date F20A/0668 was submitted in 2020 with a high court decision pending on the enforcement order by FCC on breaching 65 ATMs (11pm – 7AM – Condition 3(d)) This is not the issue in this planning

application – THE ISSUE IS BREACHING THE 65ATMs on South Runway and taking two additional hours from the night time restrictions on North Runway.

The awakening report is about how many times a person awakes at night. Where is the study in Ireland that can be validated, that a normal sleeper awakes an average of 8 times every night. There is none. This is written to justify the case for additional hours at night and unlimited flights from South runway.

So in June, a hot summers night at 11pm with charters, scheduled flights taking off every two minutes, one will not go to sleep at all. The body and mind cannot wind down to relax to fall into a peaceful and full sleep., after 16hours of day flights.

It is not acceptable that ANCA can call the shots with regards to the NQS – absolving DAA and the airlines from any responsibility. The airlines can massage the details to suit the NAO and tick the procedure boxes.

So we now have a cosy set up – where everyone is responsible and no one is responsible. ANCA are set up as a regularatory body – at arms length - by the Government – Taoiseach – Dept of Transport – and interact with FCC in relation to planning applications – with DAA sqare-ing the circle

This is not a balanced approach and what has been approved by ANCA on behalf of DAA is not acceptable to those adversely affected.

Meanwhile, human receptors suffer collateral significant life-changing impacts.

ANCA are in direct conflict with DAA as the Aircraft Noise Competent Authority are answerable to daa only ,with a revolving circle of communication to agree a policy and procedure for airlines at Dublin Airport.

ANCA permitted 16,260 Noise Quota Counts – when the original number applied for was 7990 – over double – why? It is very clear ANCA were including the cap removal of 32 million passengers in their recommendations and decision to FCC to grant the increased Noise Quota counts predicated on 40 million passengers.

So this application was submitted with the 32m cap also as part of it in words, only in the background the follow up with a separate application to adjust the 32m to 40million .

This new part of the pre-planning consultation between DAA and ANCA - which is available to see, is now being lodged on 19th December 2023, just in time for the Christmas season and before year end.

The Voluntary Insulation has yet to be tested on homes in the direct flightpath and cannot be validated at this point. DAA have stated in the documents relating to Condition 7 that

Where possible 5-10db improvement in sound insulation performance to meet with the WHO and BS8233:2014 . 40db is the maximum noise level per the WHO .

The Applicant response does not answer clearly the significant issues relating to the impact on human receptors in the flightpath and I appeal to the Inspector to seriously consider the full impact, in the broader terms, and

refuse the removal of Condition 3(d) and Condition 5.

65 ATMs on south runway from 11pm – 7am

and no flights from 11-pm -12pm and 6am – 7am on north runway – as start and finishing sleep times.

The CONDITIONS SHOULD REMAIN IN PLACE – to protect the residential amenities for those in the flight paths – THE Longitudinal Corridor.

Sheelagh Morris & Others.

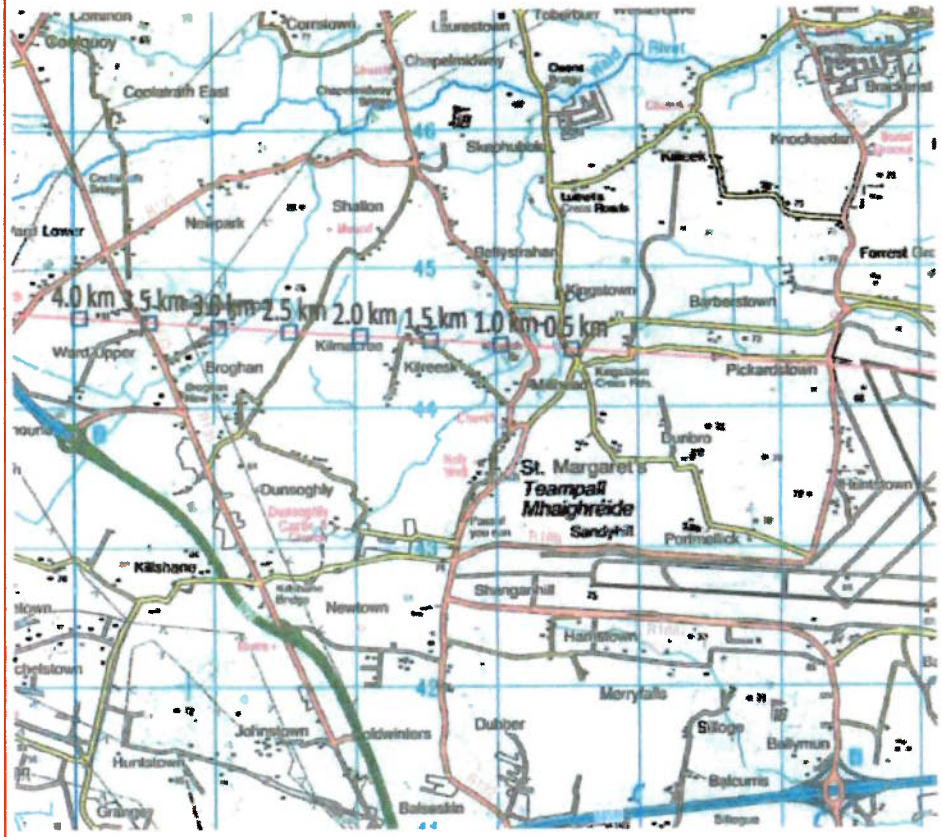
Millhead

St Margarets

Co Dublin

K67 A364

Attached : Longitudinal data from DAA – follows as attachment.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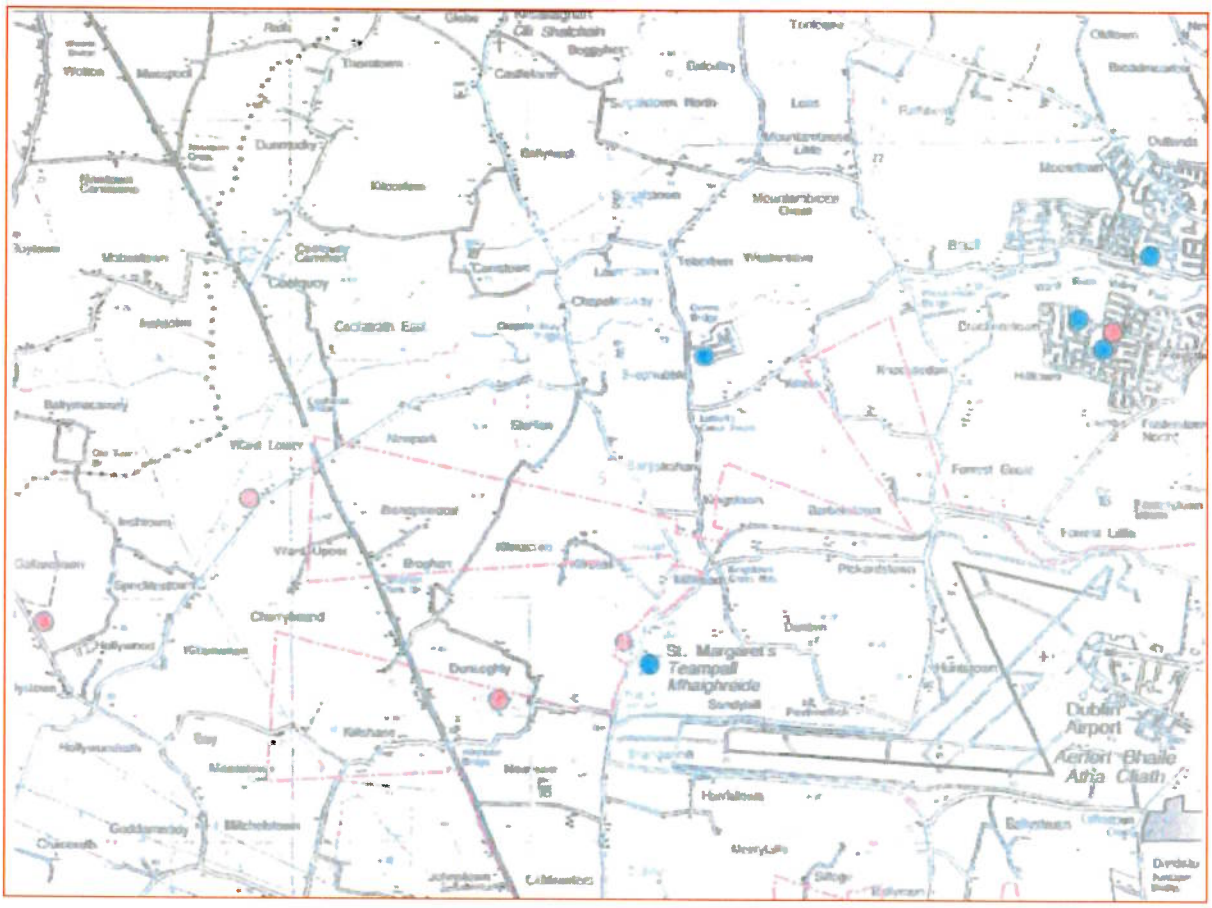
Sandyhill
Bickerdike
Allen
Partners
A11219-N01-01

0.5km – 1000ft.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Glasnevin Cemetery
Dublin City
Ballybough
Ballybough
Clontarf
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Clontarf West
Marino
Fairview
Killester
Raheny
Harmonstown
Kilbarrack
Bayside
Sutton
Howth
Howth Head
Howth Castle
Baldoyle
Portmarnock
Portmarnock South
Malahide
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Swords
Swords Demesne
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Ballymadun Face
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Ballymadun Judge
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Ballymadun Police Station
Ballymadun Fire Station
Ballymadun Ambulance Station
Ballymadun Hospital
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Ballymadun Surgery
Ballymadun Pharmacy
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Bickerdike
Allen
Partners

DUBLIN AIRPORT

A11219-N01-DR

29 August 2018

'LONGITUDINAL ANALYSIS' – L_{AMAX} AND SEL NOISE LEVELS

1.0 INTRODUCTION

Bickerdike Allen Partners LLP (BAP) have been retained by dac to predict the levels of airborne aircraft noise from individual movements close to the airport. That is from departing aircraft shortly after take-off and from arriving aircraft shortly before landing. This information has been provided in accordance with a request from the St. Margaret's Concerned Residents community group.

BAP have predicted the noise for six key aircraft types that either currently operate, have operated, or are forecast to operate in the future at Dublin Airport. The noise levels have been predicted for both arrivals and departures at eight points ranging from 0.5 to 4 km, in 0.5 km steps, from the west end of the permitted North Runway along the extended runway centreline. The points are shown in the attached drawing A11219-N01-01. This note reports these predicted noise levels and details the methodology used in their calculation.

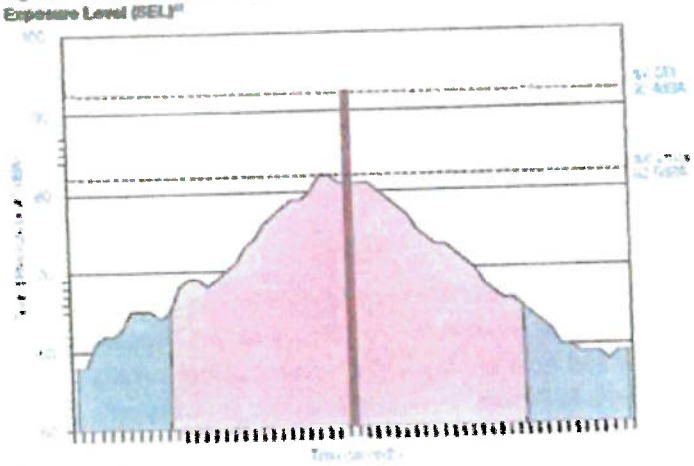
2.0 METHODOLOGY

Noise levels have been calculated using the Federal Aviation Administration (FAA) Integrated Noise Model (INM) version 7.0d. The same software was used for the noise mapping of Dublin Airport undertaken for the Environmental Protection Agency (EPA) in 2017.

Noise levels have been calculated in terms of both L_{Amax} and Sound Exposure Level (SEL). L_{Amax} is the maximum instantaneous sound pressure level of an aircraft movement. SEL is a measure of the total noise from an aircraft movement. The SEL noise level for an aircraft movement is the sum of all the noise energy for the event expressed as an average noise level for 1 second. This is shown in the figure below. By adding the SELs of all of the operations at the airport over either 16 hours or 8 hours for the daytime and night time periods respectively and then averaging you get the $L_{Aeq,T}$ average noise contours.

Bickerdike Allen Partners

Figure 3.1: Aircraft time history, showing maximum level L_{Amax} and associated Sound Exposure Level (SEL)[1]



The predictions assume the permitted North Runway is in operation. Arrivals have been modelled as using Runway 10L and departures have been modelled as using Runway 28R, both of these overfly the area to the north-west of the airport. Arrivals and departures have been modelled using straight routes, that is along the extended centreline of the North Runway.

Noise levels have been calculated for six key aircraft types:

- The Boeing 737-800 and the Airbus A320, which are the current most common aircraft types at Dublin Airport and in 2016 they performed around 37% and 23% of the total movements respectively;
- The Boeing 737 MAX8, which is forecast to be the most common type in the future, but doesn't yet operate in significant numbers;
- The Airbus A330-300, which is the current most common wide-body aircraft and in 2016 performed around 2% of the total movements;
- The Airbus A380, which is the largest aircraft forecast to operate at Dublin, but doesn't currently operate at Dublin;
- The Boeing 737-200, which is an older aircraft type that used to operate in large numbers, but no longer operates at Dublin. Noise levels have been provided for the Boeing 737-200 to illustrate how aircraft technology improves over time and that each generation of aircraft is quieter than the previous.

3.0 RESULTS

The L_{Amax} and SEL noise levels rounded to the nearest decibel are given in Tables 2 and 3 below.

Operation	Aircraft Type	Noise Level, dB L_{Amax}							
		0.5 km	1.0 km	1.5 km	2.0 km	2.5 km	3.0 km	3.5 km	4.0 km
Departure	Airbus A320	86	83	78	78	77	77	76	76
	Airbus A330-300	91	90	89	88	87	83	82	81
	Airbus A380	89	88	87	86	85	84	83	83
	Boeing 737 Max8	87	84	81	79	78	77	77	76
	Boeing 737-800	90	87	83	81	80	80	79	79
	Boeing 737-200	96	94	93	92	90	87	86	85
Arrival	Airbus A320	94	90	87	85	83	81	80	79
	Airbus A330-300	97	93	90	87	86	84	83	82
	Airbus A380	95	91	89	87	85	83	82	81
	Boeing 737 Max8	94	90	87	85	83	81	80	79
	Boeing 737-800	94	90	87	85	83	81	80	79
	Boeing 737-200	94	90	88	86	84	82	81	80

Table 2: L_{Amax} Noise Levels at Assessment Locations

Operation	Aircraft Type	Noise Level, dB(A) SEL							
		0.5 km	1.0 km	1.5 km	2.0 km	2.5 km	3.0 km	3.5 km	4.0 km
Departure	Airbus A320	94	92	89	88	87	87	86	86
	Airbus A330-300	99	98	97	96	95	92	91	90
	Airbus A380	97	96	95	94	93	92	92	91
	Boeing 737 Max8	95	93	89	88	87	86	85	85
	Boeing 737-800	97	95	92	90	89	88	88	87
	Boeing 737-200	104	103	101	100	97	95	94	93
Arrival	Airbus A320	99	96	94	92	90	89	89	88
	Airbus A330-300	101	99	97	95	94	93	92	91
	Airbus A380	100	98	96	94	93	92	91	91
	Boeing 737 Max8	96	94	92	91	90	89	88	87
	Boeing 737-800	97	95	93	91	90	89	88	88
	Boeing 737-200	97	95	94	93	91	90	90	89

Table 3: SEL Noise Levels at Assessment Locations

Bickerdike Allen Partners

The INM noise modelling software includes a database of aircraft types and associated noise performance data. It is possible to refine this default data by a validation procedure to better predict aircraft noise around an airport based on actual noise monitoring data where this is available. At Dublin, the permanent noise monitoring and flight track keeping system provides this opportunity.

BAP have validated the default INM noise predictions for the most common aircraft at Dublin by comparing predicted noise levels with the noise levels measured at the airport's noise monitoring terminals (NMTs). Based on the validation exercise modifications have been made to the default INM noise predictions for the Boeing 737-800, the Airbus A320 and the Airbus A330-300. An aircraft type for the Boeing 737 MAX8 is not included in the INM, therefore the noise levels have been predicted for the Boeing 737-800 with an allowance made for the lower noise levels of the MAX8. This allowance has been based on the assumptions used by ECRD in their work for the Airports Commission in the UK[1].

Departures by the single aisle aircraft have been modelled as using intersection take-offs, whereas departures by the wide-body aircraft have been modelled as using the full runway length, as is expected to be case once the runway is operational.

Bickerdike Allen Partners

4.0 SUMMARY

The noise levels for arrivals and departures by six key aircraft types have been predicted for operations on the permitted North Runway.

Duncan Rogers
for Bickerdike Allen Partners LLP

David Charles
Associate

Peter Henson
Partner

AN BORD PLEANÁLA
LDG- _____
ABP- _____
11 DEC 2023
Fee: € _____ Type: _____
Time: 9.15a. By: Post

Millhead
St. Margarets
Co Dublin
K67 A364.

Dec 7th 2023.

(within 5 weeks).

An Bord Pleanala.
64 Marlborough Street.
Dublin 1.
D01 V902

Case No. F20A/0668
Appeal - Night time use of Runway.
Ref ABP-314485-22

Dear Patrick

I enclose my observation submission on the Additional information submitted to ABP. - No fee as I have submitted previously.

Please confirm Receipt of this Document by Return email - Sheelaghmorris@gmail.com.

Thanking you in advance.

Sheelagh Morris + Others.

Our Case Number: ABP-314485-22

Planning Authority Reference Number: F20A/0668

An Bord Pleanála

Sheelagh Morris and others
Millhead
Saint Margaret's
Co. Dublin
K67 A364

Date: 08 November 2023

Re: A proposed development comprising the taking of a 'relevant action' only within the meaning of Section 34C of the Planning and Development Act 2000, as amended, which relates to the night-time use of the runway system at Dublin Airport.
Dublin Airport, Co. Dublin

Dear Sir / Madam,

Further to the Board's letter of 3rd October 2023 in which you were informed that the Board had received significant further information from the applicant in relation to the above appeal, the Board is publishing a newspaper notice in accordance with Article 113 of the Planning and Development Regulations, 2001 (as amended). The notice will be published in the Irish Times newspaper on 10th November 2023.

This notice will enable written submissions in relation to the further information to be made to the Board within 5 weeks beginning on the date of publication of the notice. The further information will be available for inspection and purchase at the offices of Fingal County Council and An Bord Pleanála. The further information will also be posted on the website of An Bord Pleanála at www.pleanala.ie/en-ie/case/314485.

As you are an existing participant in this appeal, there is no requirement for you to pay a fee when submitting any further submission you may wish to make in this case.

Please contact the undersigned if you need any further information in respect of this process and quote the above appeal reference in any further telephone or written correspondence.

Yours faithfully,

Patrick Buckley
Executive Officer
Direct Line: (01) 8737167

BP77

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1800 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Relevant Action – Section 34C of PDA 2000.
Night time use at Dublin Airport – Runway system

Submission to Additional Information – Sheelagh Morris & Others - F20A/0668.

ABP314485-22

Millhead

St Margarets

Co Dublin.

K67 A364.

- Condition 1: replaces the 65/night movement limit with an annual Night Quota Scheme, set at 16,260 QC points applicable between 23:00 to 06:69 local time
- Condition 2: amends the times when the new Runway 10L/28R should not be used (in normal circumstances) from 23:00 07:00 to 00:00 05:59

The ANCA 2022 decision and subsequent FCC Notice of Decision to Grant Permission is currently subject to an appeal process, which is ongoing

(Taken from Intervistas report – Introduction)

ADDENDUM

Dublin Airport
Economic Impact of
Operating Restrictions - Update

NOTE: ANCA is part of Fingal County Council and is not independent and there is conflict of interest by virtue of the fact that ANCA instructed FCC to grant the breach of the planning permissions and overthrow conditions 3(d) and condition 5.

Note : DAA fund the costs of ANCA , supply all the information to ANCA to make their decisions.

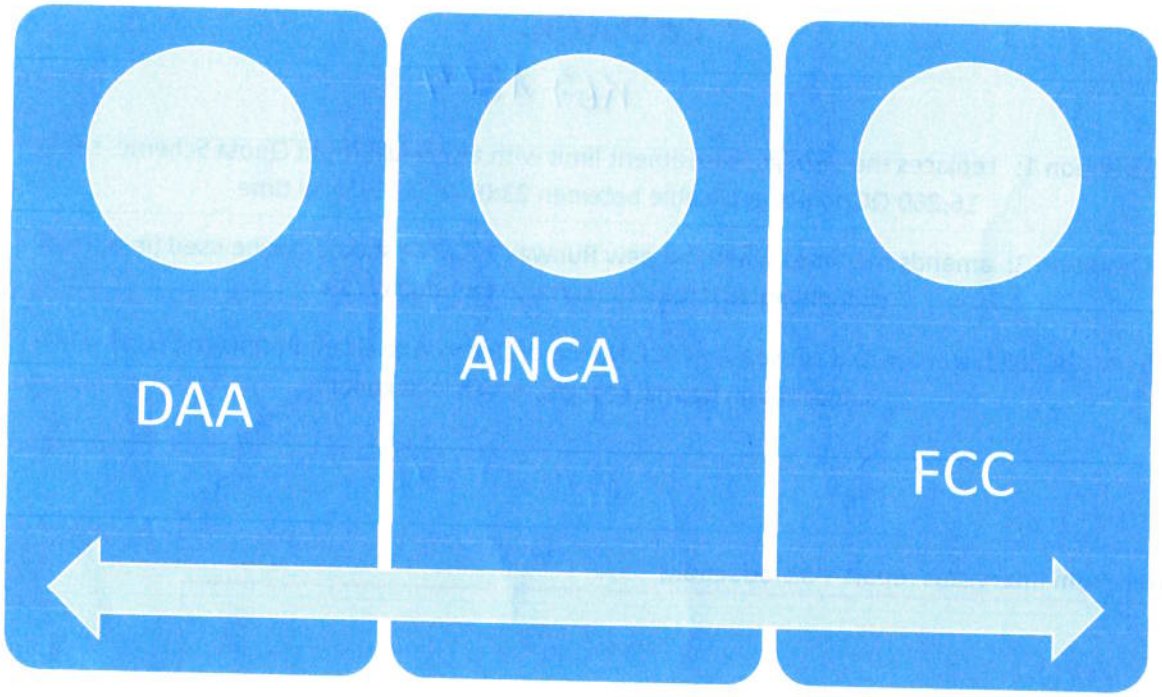
DAA – FCC and ANCA - are all the one.

DAA apply to FCC for all their planning applications – ANCA gives the OK in relation to aircraft noise and the impacts on local communities – after receiving all the information from daa – no validation – from independent source – use UK as benchmark – UK no longer part of EU – FCC grant permission

Independence of roles and authorities is conflicting and compromises the planning process and effectively places DAA above the planning system.

Each airport is enpowered to set their own NAO (Noise Abatement Objective) which

gives DAA the full power to override the flightpath victims trapped in the Longitudinal corridor. The conditions 7 and 9 were part of the planning permission for north runway for 16 hours on North Runway only and a limit of 65 ATMs on south runway.



1. Daa have proposed this Night Aircraft Quota , with no changes to condition 7 and 9 for those in the Longitudinal corridor. AQS would be reviewed every five years by ANCA and FCC – when there is a limit of a 6 months season placed on QC points, and this is at the discretion of the airport operator, how they are assigned. The AQS is not designed for those under the flightpath or parallel to the runways, as it does not consider the number of SEL's and lamax levels , envisaged to cause sleep deprivation and health issues. The contours used are the Lnight and Lday to support the noise measurements and this is not acceptable for those trapped in between the runways and under the direct flight path (the Longitudinal contour – 0 – 3000 ft) . A grant of permission would present a position of entrapment for those in the Longitudinal corridor with no solution going forward.

2. (Extract from EIAR Appendix 13A)

As part of aviation legislation, Directive (EC) 2002/49/EC of the European Parliament and of the Council of 25th June 2002 relating to the assessment and management of environmental noise, as amended by the Commission Directive (EU) 2015/996 of 19th May 2015 establishing common noise assessment methods.

The regulations are to be known as the European Communities (Environmental Noise) Regulations 2018 and came into operation on the 31st December 2018. They require the production of strategic noise maps and set agglomerations, major roads and major airports. They also require the production of subsequent action plans.

The EU introduced EU Regulation 598/2014 in 2016. This repeals 2002/Ec2 which set out procedures and rules for the introduction of noise related operating restrictions to the busiest European airports. This previous regime for managing noise airport noise placed the responsibility with the airport operator. The entry into force in 2016 of EU Regulation 598/2014 represents a shift in responsibility from the airport operator to a separate independent statutory entity or competent authority to oversee the delivery of the new, more prescriptive approach to airport noise management.

NOTE HERE : DAA were responsible for noise management at Dublin Airport.

NOTE: Dublin Airport has enjoyed the monopoly of setting their own standards on aircraft noise *and other up to the present day.*

There was no Restrictions enforced by the Council or by the EPA .

This is set to change with the legislation of the setting up of the ANCA (The Aircraft Noise Competent Authority) reporting to Europe under EU598/2014.

So this application is more than changing the 2 conditions and permitting 24 hour flights at Dublin Airport. The current runway will be permitted to operate 24 hours a day as they currently do.

This application is about transferring the responsibility for noise and airport activity to ANCA, IAA and ATC – should this application be granted.

The wording on the application fails to state that this is the setting up of noise regulations by daa , worded and composed by daa for the NAO as daa are the only candidate making the recommendations. This is a biased approach and does not consider those between the runways and in the flight path, where mitigation measures cannot realistically be achieved.

- **Catalytic Impacts**. The way in which the airport facilitates the business of other sectors of the economy. As such, air transportation facilitates employment and economic development in the national economy by facilitating trade, tourism, investment and productivity growth.

There is no mention of the climate change and impact of increased air traffic at Dublin Airport.

The Carbon emissions are a matter for each person who sits on an aircraft per DAA's CEO , Kenny Jacob - (interview with Clare Byrne on RTE Radio – Thursday 16th November at 11am)

Reference the words of Kenny Jacobs.

More aircraft flying – more emissions - more Environmental PM matter emitted .

Air traffic forecasts for Dublin Airport, produced August 2023, were provided by daa for the period 2023-2025.[4] These included a forecast assuming the ANCA 2022 decision and subsequent FCC Notice to Grant but maintaining the 32 million cap on annual passenger volumes ("unconstrained"), and another assuming the application of the operating restrictions specified in the 2007 planning permission as well as the 32 million cap ("constrained"). These forecasts are described further in the next section.

Daa have announced their intent to lodge planning permission on 19th December, leading up to the busiest time of the year for families , for an increase to 40 million passengers, and at time of writing, this has not been lodged. The decision by ABP has not been reached and deliberated and should *not be considered while this application is pending. This is project and planning permission* blending. Also an Enforcement order was lodged to the High Court with DAA receiving a stay on it and outcome still pending.

If I submitted planning for an additional extension on my home, and before the decision was made by FCC, the planning section, I then applied to turn that space into a music school, would I be permitted as DAA are , in this case. The answer we know, is no , this would not be permitted. Yet this is what DAA are doing here.

It does appear that this is a parallel strategy to have both considered and progressed together.

Where is the environmental protection, while we are in a crisis of climate change. Aircraft are not mentioned or considered, while road traffic, cows and fossil fuels are the offending destroyers. The environmental damage of aircraft is exempt in the eyes of our government , the EPA , and Europe . As our farming community have to reduce their dairy herd , - cows die while more planes fly.

The case for creating jobs overrides the future protection of our planet and reducing emissions. The COP are meeting in Dubai currently, and the Irish Government has pledged 25million over 2 years to the countries most affected by climate change. We see Eamon Ryan returning to Dublin on a flight, for a Dail vote, on Tuesday 5th December, and will return again to Dubai to resume his presence at the COP convention. - the aircraft carbon footprint does not appear to matter to our Minister of Transport, the Green Party.

Aircraft are exempt, when it comes to our carbon emissions as aircraft are considered in a separate category under the ICAO. So from the ICAO website, we see the following:

The 2022-2025 work programme in the ICAO environmental committee (CAEP) is reviewing both the aircraft noise and the CO2 emissions standards.

(taken from the EASA website – Aeroplane CO2 emissions)

ANCA are following the methodology of the Laeq16hr contours and diminishing the significant impact of SEL (single event levels) and LaMax - slow and fast. It is the SELs that cause significant disturbance with the constant take offs at 70% of the time on North Runway

AECOM

Dublin Airport North Runway Relevant Action - Addendum to Appropriate Assessment Screening Report (September 2021)

Project number	Client	Date	Prepared by
60601864	daa	11 September 2023	Tony Marshall CEcol MCIEEM, Technical Director
Checked by	**Approved by**	**Revision No.**	
Martin Birt	Colin Bush CEnv MIEMA, Associate	0	

Introduction

AECOM, on behalf of daa, prepared an Appropriate Assessment (AA) Screening Report to accompany the application for a proposed development comprising the taking of a relevant action (the 'proposed Relevant Action') within the meaning of Section 34C of the Planning and Development Act 2000, as amended.

Review of this document.

Change to modelled flightpaths

On commencement of North Runway operations in August 2022, an issue regarding departure flightpaths was identified which resulted in some local communities being unexpectedly overflown. daa immediately started a review with the aim of satisfactorily resolving the issue as soon as possible. The review process involved engagement and coordination with the relevant stakeholders, and it identified that some of the Instrument Flight Procedures (IFPs)[1] were not aligned to modelling assumptions included in daa's planning submissions. The outcome of the review, in consultation with the Irish Aviation Authority (IAA), proposed updates to the affected IFP, specifically the current Standard Instrument Departures (SIDs)[2] which will result in flightpaths aligning more closely with the information previously communicated by daa. The revised SIDs were required to go through regulatory review and consent processes before they could be implemented. They were subsequently approved and became operational on 23 February 2023, in line with the International Civil Aviation Organisation's Aeronautical Information Publication cycle.

The changes to modelled flightpaths do not result in any European sites which were not assessed in the updated AA Screening Report being over-flown at heights at which disturbance of Qualifying Interest (QI) / Special Conservation Interest (SCI) species could occur.

This could change again – and for those in the Longitudinal Corridor, which is not recognised as a contour in the methodology used in the EIS, are collateral damage and insignificant in the eyes of the applicant.

Air traffic forecasts

In September 2021, it was forecast that a passenger throughput of 32 million passengers per annum (mppa) would be reached in 2025 in the Proposed Scenario and in 2027 in the Permitted Scenario. Due to a faster recovery from the Covid-19 pandemic than predicted, latest forecasts show that a passenger throughput of 32mppa is now likely to be achieved in 2024 in the Proposed Scenario and 2026 in the Permitted Scenario. The 32mppa Cap on permitted annual passenger capacity of the Terminals at Dublin Airport arises as a result condition no. 3 of the Terminal 2 Planning Permission and condition no. 2 of the Terminal 1 Extension Planning Permission. These conditions provide that the combined capacity of Terminal 1 and Terminal 2 together shall not exceed 32 million passengers per annum.

Table 1-1 shows the updated forecasts for the two Assessment Years in the Permitted and Proposed Scenarios.

Table 1. Air Traffic Forecasts in Assessment Years

	2025		2035	
	mppa	ATM	mppa	ATM
Permitted Scenario	31.8	227	32.0	228
Proposed Scenario	32.0	240	32.0	240

This breach in the planning has been combined with the Terminal 2 planning permission and further muddies the waters - The oral hearing for T2 was run directly after the oral hearing for F04A/1755 in 2006 and gave no time for the Resident groups to examine in depth and present a full and meaningful submission. I attended the oral hearing and felt it was a continuation of F04A/1755 and the two were intrinsic linked together for the purpose of grant of permissions.

With all the data submitted – how does the ATMs in the above Air Traffic forecasts in assessment years compare to 65 movements from 11pm to 7am on both north and south runway? This needs to be clarified.

As set out in the updated AA Screening Report, targeted field surveys carried out at Baldoyle Bay Special Protection Area (SPA) and Rogerstown Estuary SPA between June 2016 and December 2017, and in April and May 2018, were completed pre-Covid-19, at a time when Dublin Airport was operating at around 32mppa. At this time, no evidence was found of any disturbance of birds within these sites being caused by over-flying aircraft. Moreover, aircraft disturbance

No Field study done on the impact of the wild birds and wildlife in Millhead and St Margarets.

Since the new runway was built the rodent population (rats) has greatly increased and is a continuous problem . It has reached epidemic levels with rats now entering parked vehicles and farm machinery.

While winter brings vermon about, the extent of the escaltion of rats in the are area is proving continously problematic . Millhead borders on DAA lands.

Earlier Fleet Modernisation

During the period since September 2021 there has been an earlier modernisation of aircraft fleet than initially anticipated. The future forecasts now allow for the earlier fleet modernisation that has occurred and have been used in the updated assessments.

Ryanair and Aer Lingus have replaced some of their fleet which are quieter – but the noise produced as a result of ATO and ATL are not reduced enough to actually stop a sleeping human from waking or trying to get to sleep. The Boeing Max – have a reduction of 7-8 db and still registering 51 db in my bedroom on take off (ATO) *Landing aircraft are much quieter, but 70% of all ATMS are take offs on* the North Runway, therefore it is the take offs that wakes us and keeps us awake.

It is now the quiet month of November and it is more bearable – but from May to end of October is constant takes off every 1-2 minutes up to 12 midnight and starting at 5.30 in the morning on the South runway. The sleep deprivation is significantly harmful when one cannot get to sleep.

NOTE: North Runway operates under Mode7B which means 70% of the take offs are on 10L .

External db levels of 80-90-95 db Lafmax and lasmax and SEL are the norm.

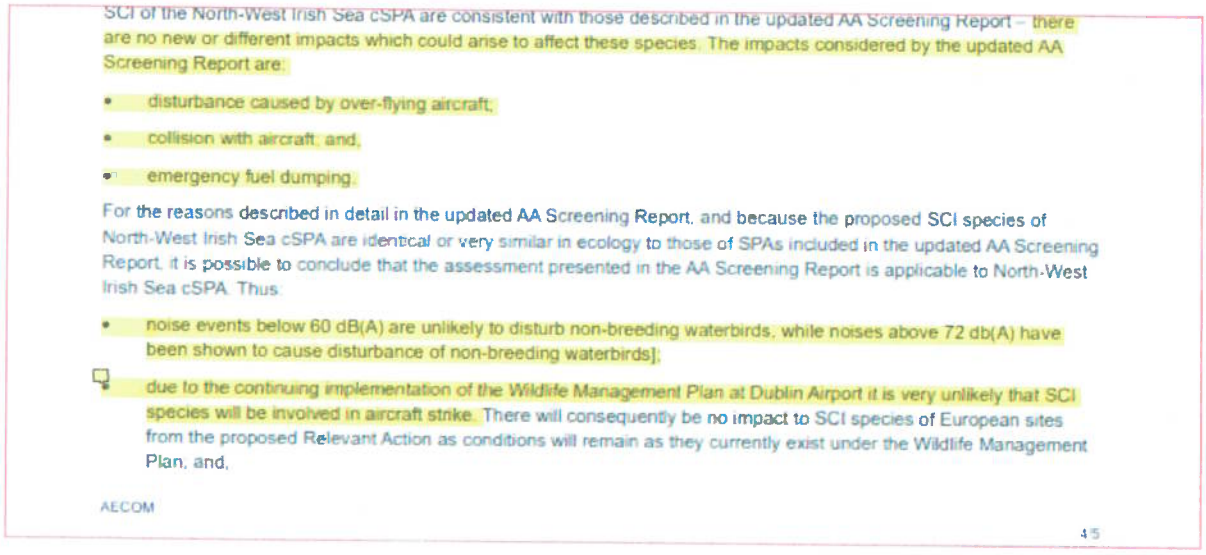
As DAA chose to use the Lnight and Lday – Laeq16hr methodology to calculate the noise levels for this planning applications to extend the operating hours from 11pm to 12pm and 6am – to 7am. These hours will be the most disturbing and busiest times for sleeping receptors, humans living under the underway and in the flightpath. There is no denying this or sugar coating it.

If I was to compare an 330 aircraft taking off at Dublin Airport, in the Laeq16hr – Lday and Lnight methodology used and every aircraft taking off for 16hrs and 8 hours at night to a chainsaw starting and stopping, - under the DAA calculations , the SELs would be hidden in an average noise level produced in the contours produced by the INM model used by the applicant.

So effectively this model states: ear protection would not be required, as the noise is spread over a wide area and averaged out. Of course we know, this is not the case, and neither is it so, for those in the direct flightpath, as aircraft take off and climb, and to a less degree, on landing. Those close to the runway are far from the same as those at the other end of the contour lines drawn.

For 9 months of the year – the constant aircraft noise is unbearable. The Insulation scheme and Voluntary Purchases Scheme was part of the planning permission . Daa and FCC agreed both of these schemes – excluding the views of those adversely impacted. It must be noted here, as per my

original submission - 14 families , residents of Fingal, living at Dublin Airport were exempt from the Voluntary Insulation and Voluntary Home Buy Out Scheme and were treated separately, and their issues dealt with to their full satisfaction, not on the terms of a restricted and interpreted wording to suit the applicant and Fingal County Council.



SCI of the North-West Irish Sea cSPA are consistent with those described in the updated AA Screening Report – there are no new or different impacts which could arise to affect these species. The impacts considered by the updated AA Screening Report are:

- disturbance caused by over-flying aircraft;
- collision with aircraft; and,
- emergency fuel dumping.

For the reasons described in detail in the updated AA Screening Report, and because the proposed SCI species of North-West Irish Sea cSPA are identical or very similar in ecology to those of SPAs included in the updated AA Screening Report, it is possible to conclude that the assessment presented in the AA Screening Report is applicable to North-West Irish Sea cSPA. Thus:

- noise events below 60 dB(A) are unlikely to disturb non-breeding waterbirds, while noises above 72 db(A) have been shown to cause disturbance of non-breeding waterbirds];
- due to the continuing implementation of the Wildlife Management Plan at Dublin Airport it is very unlikely that SCI species will be involved in aircraft strike. There will consequently be no impact to SCI species of European sites from the proposed Relevant Action as conditions will remain as they currently exist under the Wildlife Management Plan, and,

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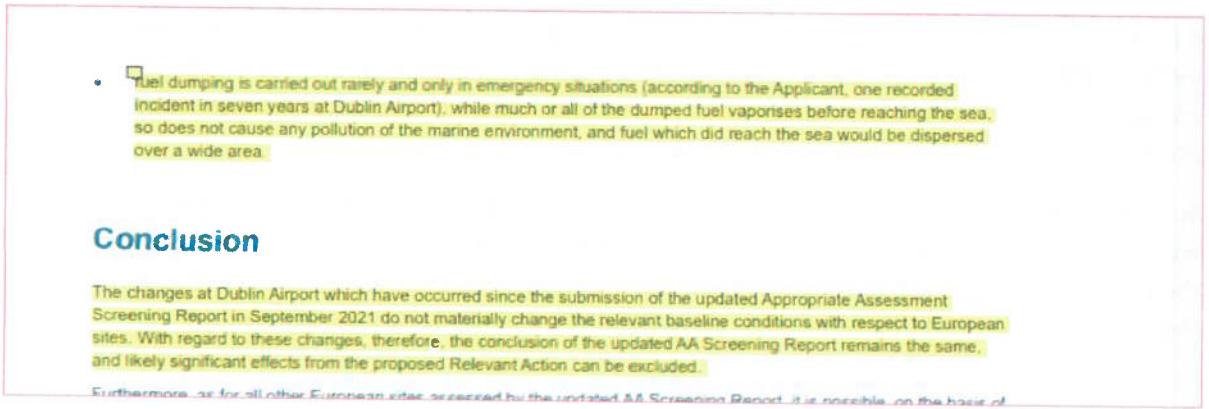
4 5

What is the wildlife Management plan for St Margarets and Millhead?

Since the new runway opened the wildbird population is practically non existent. The increase in the rat population has denied us the opportunity to encourage the wild birds to stay in the garden and this has a negative affect on mental health and well-being. The garden is not recognized by daa is a vital part of our homes - it was stated – we will lose our gardens and this became a mantra to justify the loss of our outdoor room.



- fuel dumping is carried out rarely and only in emergency situations (according to the Applicant, one recorded incident in seven years at Dublin Airport), while much or all of the dumped fuel vaporises before reaching the sea, so does not cause any pollution of the marine environment, and fuel which did reach the sea would be dispersed over a wide area.

Conclusion

The changes at Dublin Airport which have occurred since the submission of the updated Appropriate Assessment Screening Report in September 2021 do not materially change the relevant baseline conditions with respect to European sites. With regard to these changes, therefore, the conclusion of the updated AA Screening Report remains the same, and likely significant effects from the proposed Relevant Action can be excluded.

Furthermore, as for all other European sites assessed by the updated AA Screening Report, it is possible, on the basis of

While fuel dumping is carried out over the Irish Sea (contaminating the fish population) there is a risk at the end of the runways and in the direct flight path that fuel dumping could be an event that will occur. Thankfully and hopefully this will never be the case. However this raises another issue, what is the PM (particle matter) at the end of the runways and surrounding area and in the direct flight path on take off and landings. One can see the plume line of emissions from the wings of the aircraft in weather conditions, in the sky as they come in to land and also on take off. There is no station set up by the EPA in St Margarets to monitor the air quality . There is a need now that the new runway is operating, in the interest of the health of those trapped in the flightpath with no satisfactory options.

This morning, Sunday 3rd December, the odour from aviation fuel was in the atmosphere from early morning to lunch time (9am – 1300) The weather conditions – it was very foggy and the fumes and odours remained trapped in the air. What is the PM levels this morning? There is no way of capturing this.

RICONDO®

September 2023

Dublin Airport

North Runway, Regulation 598/2014 (Aircraft Noise Regulation) Cost-Effectiveness Analysis Updates

Prepared for:

daa

Prepared by:

RICONDO

6. OPERATING RESTRICTION MEASURE

Scenario 2 with the addition of the proposed 55 dB Lnight RSIGS for people exposed to high level of impact caused by night-time noise levels above 55 dB Lnight continues to meet the cNAO and priority associated with reducing high level night-time disturbance. Therefore, operating restriction measures are not necessary.

ANCA are responsible for ensuring that aircraft noise is controlled for those adversely impacted . To date ANCA have made their recommendations to increase the Noise Quota Count while ignoring those trapped in the flight paths . ANCA have been directed not to take into consideration the current VHIS or the VHPS as agreed by DAA the applicant and FCC the local authority – excluding those homes and lives , with their quality of life destroyed and health impacts changed forever – denying a nights sleep and evening rest to residents at the end of the runways and between the two runway.

7. COMPARISON OF FORECAST INCLUDING ADDITIONAL MEASURES AND PERMITTED OPERATIONS SITUATION SCENARIOS

Section 7 of the 2021 CEA Report describes the comparison between the Scenario 2 with the Residential Sound Insulation Grant Scheme (Forecast Including Additional Measures) and the Permitted Operations Situation scenario that includes the North Runway restrictions:

- Condition 3(d) – Runway 10L-28R shall not be used for take-off or landing between 23:00 and 07:00.
- Condition 5 – The average number of night -time aircraft movements at the Airport shall not exceed 65 per night (between 23:00 and 07:00) when measured over the 92-day modelling period.

The purpose of the comparison was to evaluate which of the two is more cost-effective to address the same cNAO and related priorities.

7.1 EFFECTIVENESS COMPARISON

Revised Table 7-1 presents the HSD and HA populations for the Forecast including Additional Measures scenario and the Permitted Operations Situation scenario. **Revised Table 7-2** compares the metrics of the two scenarios to the 2018 situation. Both the Forecast including Additional Measures and Permitted Operations Situation scenarios reduce the HSD and HA populations. Based on the updated results, both scenarios continue to meet the cNAO and associated night-time disturbance priorities.

REVISED TABLE 7-1: SCENARIO POPULATION EXPOSURE LEVEL RESULTS

SCENARIO	HIGHLY SLEEP DISTURBED POPULATION	HIGHLY ANNOYED POPULATION
Forecast including Additional Measures	23,790	53,762
Permitted Operations Situation	22,250	54,998

SOURCE: Bickerdike Allen Partners LLP, A112067-21 CAEP9_1.0 Summary of Results Including Mitigation, September 30, 2021 (population values)

We see the conditions set up - no ATMS on North runway from 11pm to 7am

And only 65 ATMs on 10R-28L - this has not been adhered to by DAA since the opening of North Runway on 23rd August 2022 and FCC only issued an enforcement notice – 11 months after the breach , which was highlighted continuously . This is a matter for the courts now – and we see the courts have permitted a stay on this , to continue to breach the conditions.

The conditions are the conditions and are there to protect the amenity of the local community surrounding the runways and flightpaths.

Looking at the above table – there is an increase in HSD of 1,540 and Highly Annoyed population of an additional 1,236 - can DAA guarantee 40db at night SEL and LAFmax and LASmax to those HSD and HA populations – This is also a responsibly of ANCA under the NAO in line with 598/2014 regulations. Each airport is permitted to set their own NAO and this is submitted as the END to the European Union . Dublin Airport must abide by its responsibilities and direct airlines to comply.

The Scheme rates all aircraft types according to their respective noisiness of landing and and take-off using a measure called EPNdB 'effective perceived noise' in decibels. Band of EPNdB are assigned a Quota Count (QC) rating, this being done on an exponential scale.

For each reduction of 3 in EPNdB the QC is halved:
EPNdB over 101.9 is QC/16
EPNdB 99 – 101.9 is QC/8
EPNdB 96 – 98.9 is QC/4
EPNdB 93 – 95-9 is QC/2
EPNdB 90 – 92.9 is QC/1
EPNdB less than 90 is QC/0.5
EPNdB less than 87 is exempt (ie QC of zero).

Figure 3.2 illustrates the historic trend in certified aircraft noise levels in terms of the cumulative 25 margin to the Chapter 3 limits for the heaviest weight variants and maximum thrust rating for an aircraft type(5) Aircraft designs certified during the last 10 years (e.g. Boeing 737max, 787: Airbus A320neo, A350, A330neo) have a cumulative margin of 5 to 15 EPNdb below the latest Chapter 14 standard. The general trend over the last three years has seen marginal noise improvements to these aircraft designs.

(taken from EASA website)

What I see above again is different aircraft noise counts that add further confusion to identifying and standardising what is aircraft noise. For me, it is the event that wakes me, that prevents me from sleeping and going back to sleep, once sleep disturbed.

The airlines Ryanair and Aer Lingus are banking on the Noise quota system to fly as many aircraft as they want when most of these will be in the EPNdb less than 87 – NQC of ZERO

Yet for me and my family, waking up with each take off and more and more of them will not be ZERO

The report on waking from sleep – when one cannot get to sleep – that is the bigger issue here.

Revised Table 7-3 presents the cumulative costs for the Forecast including Additional Measures scenario and the Permitted Operations Situation scenario. Costs for the Forecast including Additional Measures scenario are the combined sum of the preferential runway use measure costs listed in Table 4-5 of the 2021 CEA Report and the revised RSIGS costs summarised in Revised Table 5-2. The cumulative cost for the Permitted Operation Condition scenario is based on updated figures provided by InterVISTAS for over the three-year period between 2023 and 2025.

REVISED TABLE 7-3: ESTIMATED TOTAL COST COMPARISON TO IMPLEMENT – FORECAST INCLUDING ADDITIONAL MEASURES VERUS PERMITTED OPERATIONS SITUATION SCENARIOS

SCENARIO	CUMULATIVE COST 2025
Forecast including Additional Measures[1]	€3,833,525
Permitted Operations Situation[2]	€842,000,000

NOTES:
1. Forecast including Additional Measures scenario cost estimate is expressed in constant prices.
2. Permitted Operations Situation scenario costs are in 2020 euros.

SOURCES: Ricondo & Associates, Inc., September 2023 (sum of costs for Forecast including Additional Measures scenario); InterVISTAS, August 2023 (InterVISTAS Econimpact Update_03Aug2023.xlsx) (total gross value added cost estimates).

7.2 COST TO IMPLEMENT COMPARISON

Costs associated with the Permitted Operations Situation scenario are related to the constrained number of movements forecast for 2023 to 2025 due to the North Runway operating restrictions compared to unconstrained levels up to 2025, which is when the 32 mppa is expected to be reached. The updated movements forecast conducted by Mott MacDonald indicates the 32 mppa level is expected to occur in 2024 after which there would be no growth in passenger volumes.[1] An updated economic impact study conducted by InterVISTAS based on the updated forecast movement conditions conducted by Mott MacDonald determined the constrained number of movements would lead to loss in value of goods and services produced (gross value added [GVA]) compared to the unconstrained scenario. All costs are expressed in 2022 prices.[2]

What is the human cost of lack of sleep – unable to sleep , dreading the summer season from May to October when the schedule of ATMS are taking off every minute,during the day – the loss of our gardens, then the Christmas period and Easter Period.

What is the human cost to each individual living at the end of the runways and in the immediate flight path. The commercial cost is quantified and pushed forward to diminish our health and the mental impacts . The CEO Kenny Jacobs , when asked by Clare Byrne on her radio show on 16th November, stated there were some homes he would not live in – but yet the Voluntary insulation and Home Buyout scheme does not reflect the true cost of the collateral continuous damage of DAA and their runway and operation of Dublin Airport.

The human cost for those trapped in the Longitudinal Corridor has not been quantified and we are calling for this to be done – in the interest of fairness and equality

InterVISTAS indicated that as a result of the operating restrictions, the Irish economy could forgo an additional 3,130 jobs and €256 million in GDP by 2024, relative to the night operations with the ANCA June 2022 conditions. The forgone economic impact is projected to decline in 2025 as the 32 mppa cap starts to reduce the gap between the forecast scenarios. By 2025, the forgone economic impact is estimated to be 1,510 jobs and €122 million in GDP. The economic impact results are lower than estimated in 2021 due to the narrower gap between the unconstrained and constrained forecasts.

There is no costing from InterVISTAS on the cost to home owners, the impact on their lives, over time, with constant and significant life changing , stuck or having to move, find a replacement home, and all the costs associated with that. Also the stress of moving, finding a replacement home and fact is, you will never find another home , like what you have. The cost of adapting , new neighbours, new community, longer and more expensive commuting to work, hospitals and menities.

It must be noted those impacted in St Margarets are natives of three generations, as is my case and our Identity and sense of belonging is in St Margarets . Dublin Airport have invaded and taken our quality of life and continue to do so, as an entitlement for the same of profits and Commercial gain .

The national strategic importance of this application has been the justification to ignore the conditions that impact on those in the flightpath , to use the media to change the mindset of the public , isolating those victims adversely affected and demonizing them. The CEO of Ryanair has continually demonized those residents adversely affected, in a deliberate campaign , accusing them of holding the county to random and the airlines. The profits is the most important goal for Ryanair and Aer Lingus for their shareholders - seats on planes are a commodity – the human factor is over shadowed by the greed for increased profits and expansion at the cost of human misery and constant torture.

2035[3]. The proposed Relevant Action does not seek any amendment of conditions of the North Runway Planning Permission governing the general operation of the runway system (i.e., conditions which are not specific to night-time use, namely conditions No. 3(a), 3(b), 3(c) and 4 of the North Runway Planning Permission) or any amendment of permitted annual passenger capacity of the Terminals at Dublin Airport. Condition No. 3 of the Terminal 2 Planning Permission (PL 06F.220670) and condition No. 2 of the Terminal 1 Extension Planning Permission (PL 06F.223469) provides that the combined capacity of Terminal 1 and Terminal 2 together shall not exceed 32 million passengers per annum (mppa) ('the 32mppa Cap'). As such the updated forecast schedules maintain the 32mppa Cap as a restriction.

The original forecasts saw passenger numbers reaching 32mppa by 2025 without the RA. The changes in the revised forecasts principally relate to the time when the 32mppa cap is reached, i.e. 32mppa will now be reached sooner than was previously estimated. As a result of the quicker return to growth now forecast, both the previously submitted *Economic Impact Assessment*[4] by Intervistas and the *Cost-Effective Analysis*[5] by Ricondo have been updated to provide ABP with the most up to date and current information.

The general operation of the runway excluded the use of the North runway from 11pm to 7am in the morning and also reduction to 65 ATMS on South runway. Every ATM is part of the operation at Dublin Airport as it involved the IAA, ATC, Air Nav, ANCA , FCC and Government departments , Finance (the main shareholder) Transport and justice and Housing.

To state that it is not, is incorrect information and is a coercion statement to mislead and change the mindset into **saying what is not ok is now ok.**

Single Event Levels and Lamax are not cancelled out with Noise quota system

The relationship between the Noise quota system and SELs and ATMs could not be further from each other.

From Tom Philips report.

Earlier Fleet Modernisation During the intervening period between the previous RFI submission on 13th September 2021, FCC's Notice of Decision to Grant Permission on 17th October 2022 and the submission of this response to ABP, the modernisation of the fleet at Dublin Airport has advanced at a quicker rate than initially anticipated.

This has been captured within the various supporting materials provided with this response. The updated assessment is based on the latest forecasts. These take account of changes in the fleet mix over recent years and how it is expected to continue to evolve. This means the forecasts allow for earlier fleet modernisation that has occurred, compared to what was previously forecast based on conservative assumptions.

Our study predicts that the current G1 aircraft types will be largely replaced on a phased basis by next generation G2 types by the mid 2030's. New next generation aircraft types (G3) are expected to enter service potentially from the late 2030s to replace G2 types, but no G3 types are assumed by 2040 at DUB

FCC granted permission to remove Condition 3 and 5(d) on 17th October 2022 less than 2 months after the new runway opened for operation. While the fleet mix has changed, this will not be completed for a number of years and thus enabling the airlines to operate as they wish, until such time their capital budgets permit such a change. The period of time to produce aircraft for delivery is also a factor. The cost of an aircraft is excessive and airlines will be slow to change their fleets until the cost of repair and maintenance exceeds the cost of replacement . Kenny Jacobs stated on the Clare Byrne Show on 16th November that discounts are offered to airlines for quieter aircraft. There are no PENALTIES only discounts - so Airlines can continue to operate their fleet as long as it suits them.

The price tag on an A330neo new aircraft is $238.5 million with the freighter version costing $259.9 million The A330 -800 as we know, is very rare, with only 14 on order. The A380 – list price $446.5 million and discounted with fleet orders. Emirates have ordered 21 of these. So the cost of changing will only happen when the airlines are ready to order. That leaves the flightpath residents to experience torturous aircraft noise on a continuous basis in the Longitudinal Corridor. DAA have stated and want the NQS which they say is a far better way of measuring noise. It is not for us flightpath residents - the increased NQS granted by ANCA means no limit to the number of aircraft taking off and landing on the North runway and South runway.

A noise quota system is proposed for night time noise at the airport. The airport shall be subject to an annual noise quota of 7990 between the hours of 2330hrs and 0600hrs. In addition to the proposed night time noise quota, the Relevant Action also proposes the following noise mitigation measures: - A noise insulation grant scheme for eligible dwellings within specific night noise contours – A detailed Noise Monitoring Framework to monitor the noise performance with results to be reported annually

to the Aircraft Noise Competent Authority (ANCA), in compliance with the Aircraft Noise (Dublin Airport) Regulation Act 2019

ANCA have now issued their decision, (Draft Regulatory Decision). ANCA have not only considered the requests, but went far and beyond the request, permitting 16,260 noise Quota counts between 2300pm – 6.59 am (8,270 in excess of what was requested) and now the subject of this submission. This consultation is just another process that will be logged and submissions from the victims ignored, as part of the planning process to justify the outcome and a mere tick box exercise.

So 16,260 ATM will be permitted from 11pm to 7am ranging from 90db upwards. Any below that, are free. So as many of the Ryanair Boeing -800 max can fly without any issue – with the take off noise disturbing the night time peace for sleeping and resting residents.

Daa sought the approval from ANCA to change the night time hours, imposed by ABP , based on an economic reason to trample on those adversely affected, in terms of health and well being.

The Noise Quota system - aircraft do not register in the count under 87db and only register in the count at 90db. **This is set by the aircraft manufacturer** – so Boeing set the level acceptable for Boeing aircraft and Airbus set the level for Airbus aircraft – not ANCA, not FCC not the EPA .

The Scheme rates all aircraft types according to their respective noisiness of landing and and take-off using a measure called EPNdB 'effective perceived noise' in decibels. Band of EPNdB are assigned a Quota Count (QC) rating, this being done on an exponential scale.

For each reduction of 3 in EPNdB the QC is halved:
EPNdB over 101.9 is QC/16
EPNdB 99 – 101.9 is QC/8
EPNdB 96 – 98.9 is QC/4
EPNdB 93 – 95-9 is QC/2
EPNdB 90 – 92.9 is QC/1
EPNdB less than 90 is QC/0.5
EPNdB less than 87 is exempt (ie QC of zero).

A limit is placed on the total number of QC points per 6 month season (how these are assigned per night is at the discretion of the airport operator). Thus under a pure quota count system, if planes rated at 96 EPNdB were replaced with planes rated at 95 EPNdB, twice as many could be flown during the restricted period.

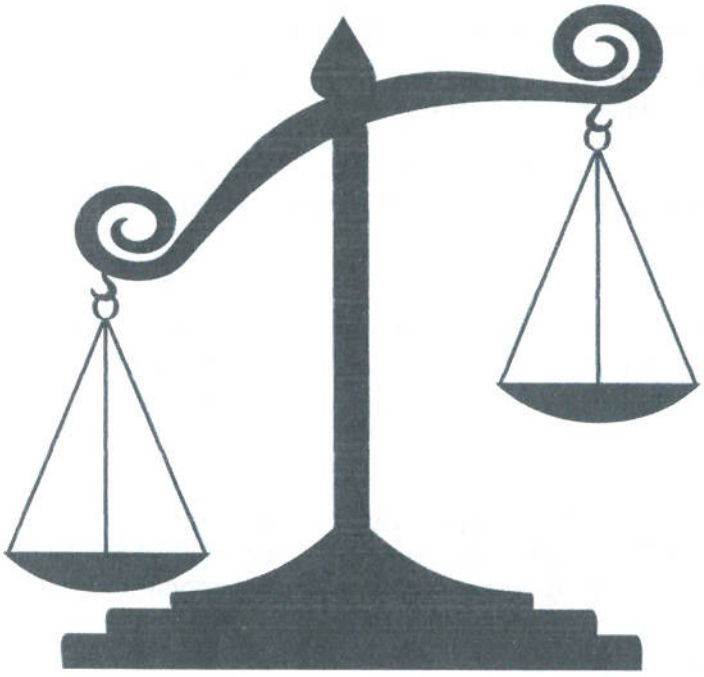
The environmental objective is to keep within a given 'average noise' limit for the whole night, measured in Leq. Leq stands for Level equivalent and is calculated by adding together the noise energy of all the noise events across a given time period and then taking the continuous level (ie. It irons out the peaks and troughs).

An extreme case will illustrate the way Leq works. One concorde on departure had equivalent noise energy to 120 Boeing 757s – so one [Boeing 757] plane every 2 minutes for 4 hours, produced the same Leq as 2 mins of concorde followed by 3 hrs 58 mins of silence.

There is no official noise index for showing night noise in the UK (although Leq is officially recognised during the day period between 0700 and 2300). However, the Government

believes that producing 'noise maps' for airports at night using Leq contours is an adequate way of expressing aircraft noise, and has produced maps for the London airports in its recent consultation on the night noise regime.

As a group of victims trapped in the Longitudinal Corridor, we have no confidence in ANCA that the balanced approach is administered and the scales leaves us up in mid air,



DAA have all the weight behind them with ANCA as DAA control ANCA and part of FCC.

Residents have no say, and are insignificant. The Inspectors at the oral hearing in 2006 recogised the very real and significant negative impact on those in the Longitudinal corridor and recommended that the construction of North runway be refused.

Report on awakenings as a response to noise during sleep

5 September 2023

Note with respect to noise effects on health

Night-time use of the runway system at Dublin Airport

Reference to the Relevant Action Revised EIAR (September 2021)

ABP-314485-22

F20A/0668

DAA PLC

by ***Prof. Dr. Thomas Penzel (Charité Berlin, Germany)***
Prepared for ***Tom Phillips + Associates***

RFI item 1

Item 1 of the RFI request states the following:

The assessment in the EIAR of the effects of noise from ATMs at night (2300 to 0700 hrs) is based on energy averaging noise metrics over relatively long periods e.g. 8 hrs. correlated with the percentage of the exposed population likely to self-report being highly sleep disturbed (%HSD), assessed with a standardised scale based on the guidance in the World Health Organisation's (WHO) Environmental Noise Guidelines 2018. (WHO ENG 2018)

However, 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 a receptor.

The EIAR includes information on peak LAmax noise levels from ATMs and the number of these events at night in terms of the N60, N651 noise contours for the 92 day summer average of ATMs and airport modes, and the N60 metric and LAmax2 for the single modes of airport operation. But these data are presented for information purposes only and there is no analysis of the effect of peak LAmax noise levels from ATMs on additional awakenings at night regarding the baseline and consented scenarios.

You are requested to assess the probability of additional awakening due to the peak LA,s,Max of ATMs at night between 2300 and 0700hrs for the 92 day summer average of ATMs and airport modes, and for the single modes of airport operation 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 (Environmental Noise Guidelines for the European Region: A Systematic Review on Environmental Noise and the Effects on Sleep - International Journal of Environmental Research and Public Health).

Extracts from Future Development 11 pages – Additional Information.

22.1.2 Accordingly, in circumstances where there is a long-term policy to expand Dublin Airport as a whole, it is considered appropriate that the competent authority assessing the proposed Relevant Action would have an overview of those longer term plans, so that the proposed Relevant Action can be viewed and assessed in that wider context, with account being taken of planned future development at Dublin Airport as appropriate and as far as practically possible at this stage.

22.1.3 There are development proposals currently being prepared which will seek planning permission for future airport growth to 40 mppa. These will include proposals for airport infrastructure required to accommodate this growth. These future development proposals will require a grant of planning permission in order to be realised, which in itself will entail planning and environmental impact assessment. The proposed Relevant Action is a standalone proposal and is not reliant on future airport growth in order to be realised.

22.1.4 Equally, future airport growth can occur (subject to planning being granted) in the absence of the proposed Relevant Action. Notwithstanding the independence of the proposed Relevant Action, an awareness of future airport plans is relevant in considering the proposed Relevant Action given the potential for interaction in the future. In this respect, this chapter is intended to give an overview of future development plans so that, consistent with the purpose of the EIA Directive and case law, account be taken of those future plans in the context of the assessment of the environmental effects of the proposed Relevant Action.

22.1.5 The future development plans discussed in this chapter do not form part of the proposed Relevant Action, nor is this chapter intended to undertake an EIA of these future development plans. Such an EIA is neither possible nor required at this stage; the environmental implications of such future projects will be fully assessed in future when consent is sought for them; they will be the subject of planning application(s) with any relevant supporting environmental information.

22.1.6 Since this chapter was originally written in 2021, the Infrastructure Application (IA) which will seek planning permission for future airport growth to 40 mppa has evolved and the infrastructure designs have been advanced in preparation for a planning application in Q4 of 2023. Whilst the EIAR for the IA is still work in progress, it is now possible to provide more certainty around the likely impact of this and other future development plans which have also progressed in the last two years. This chapter has been updated to reflect the more detailed information now available.

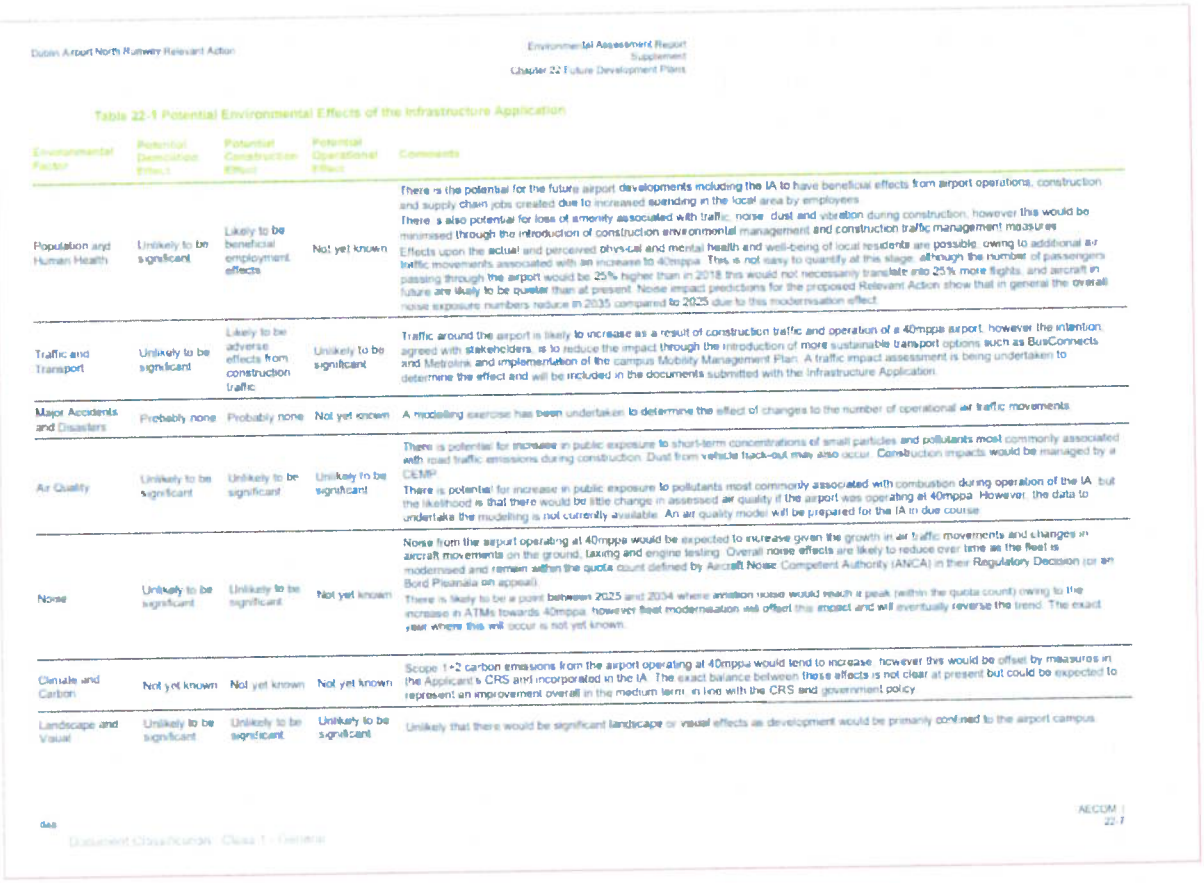
In 22.1.4 Notwithstanding the independence of the proposed Relevant Action, an awareness of future airport plans is relevant in considering the proposed Relevant Action given the potential for interaction in the future – where is the interaction for those HSD?

It is very clear from the above, from the get go, that T2 and the North Runway were one planning application, spilt into 2 parts and now, being brought from to one project.

Of course, the submission to remove condition 3 and 5(d) with the change in the Planning Act to permit a "Relevant Action" to cherry pick the two most important conditions is not acceptable to us the residents, those significantly adversely affected now considered collateral damage .

The actions of DAA, FCC and Dept of Transport, Justice and Finance, - all the owners, the shareholders of Dublin Airport and the full backing of the airlines , with no penalties , no convictions for creating serious health and mental problems, as a result of their actions.

The Voluntary Insulation programme has yet to be proved successful for those homes that have received it. No independent calibration has been carried out – and does not give those in line for insulation, confidence in the scheme. The voluntary insulation is a text book solution to tick the boxes. The failure to insulate homes, with the loss of our gardens , will in time, result in legal action. The guidelines have been set and must be adhered to with the WHO guidelines of 40db LAMAX - LAfmax and LAsmax.



Dublin Airport North Runway Relevant Action — Environmental Assessment Report Supplement — Chapter 22 Future Development Plans

Table 22-1 Potential Environmental Effects of the Infrastructure Application

Environmental Factor	Potential Demolition Effect	Potential Construction Effect	Potential Operational Effect	Comments
Population and Human Health	Unlikely to be significant	Likely to be beneficial employment effects	Not yet known	There is the potential for the future airport developments including the IA to have beneficial effects from airport operations, construction and supply chain jobs created due to increased spending in the local area by employees There is also potential for loss of amenity associated with traffic, noise, dust and vibration during construction, however this would be minimised through the introduction of construction environmental management and construction traffic management measures Effects upon the actual and perceived physical and mental health and well-being of local residents are possible, owing to additional air traffic movements associated with an increase to 40mppa. This is not easy to quantify at this stage, although the number of passengers passing through the airport would be 25% higher than in 2018 this would not necessarily translate into 25% more flights, and aircraft in future are likely to be quieter than at present. Noise impact predictions for the proposed Relevant Action show that in general the overall noise exposure numbers reduce in 2035 compared to 2025 due to this modernisation effect
Traffic and Transport	Unlikely to be significant	Likely to be adverse effects from construction traffic	Unlikely to be significant	Traffic around the airport is likely to increase as a result of construction traffic and operation of a 40mppa airport, however the intention agreed with stakeholders, is to reduce the impact through the introduction of more sustainable transport options such as BusConnects and Metrolink and implementation of the campus Mobility Management Plan. A traffic impact assessment is being undertaken to determine the effect and will be included in the documents submitted with the Infrastructure Application.
Major Accidents and Disasters	Probably none	Probably none	Not yet known	A modelling exercise has been undertaken to determine the effect of changes to the number of operational air traffic movements
Air Quality	Unlikely to be significant	Unlikely to be significant	Unlikely to be significant	There is potential for increase in public exposure to short-term concentrations of small particles and pollutants most commonly associated with road traffic emissions during construction. Dust from vehicle track-out may also occur. Construction impacts would be managed by a CEMP There is potential for increase in public exposure to pollutants most commonly associated with combustion during operation of the IA, but the likelihood is that there would be little change in assessed air quality if the airport was operating at 40mppa. However, the data to undertake the modelling is not currently available. An air quality model will be prepared for the IA in due course
Noise	Unlikely to be significant	Unlikely to be significant	Not yet known	Noise from the airport operating at 40mppa would be expected to increase given the growth in air traffic movements and changes in aircraft movements on the ground, taxiing and engine testing. Overall noise effects are likely to reduce over time as the fleet is modernised and remain within the quota count defined by Aircraft Noise Competent Authority (ANCA) in their Regulatory Decision (or an Bord Pleanala on appeal). There is likely to be a point between 2025 and 2034 where aviation noise would reach a peak (within the quota count) owing to the increase in ATMs towards 40mppa, however fleet modernisation will offset this impact and will eventually reverse the trend. The exact year where this will occur is not yet known.
Climate and Carbon	Not yet known	Not yet known	Not yet known	Scope 1+2 carbon emissions from the airport operating at 40mppa would tend to increase, however this would be offset by measures in the Applicant's CRS and incorporated in the IA. The exact balance between these effects is not clear at present but could be expected to represent an improvement overall in the medium term, in line with the CRS and government policy
Landscape and Visual	Unlikely to be significant	Unlikely to be significant	Unlikely to be significant	Unlikely that there would be significant landscape or visual effects as development would be primarily confined to the airport campus

AECOM | 22-7

As we look at the above AECOM admit the impact of aircraft noise on the communities , but it is ok as the fleet modernization will offset tine impact and eventually reverse the trend . THE EXACT YEAR WHERE THIS WILL OCCUR IS NOT YET KNOWN>

OVERALL NOISE EFFECTS ARE LIKELY TO REDUCE OVER TIME AS THE FLEET IS MODERNISED AND REMAIN WITHIN THE QUOTA COUNT DEFINED BY ANCA IN THEIR REGULATORY DECISONS ON AN BORD PLEANALA ON APPEAL.

So the Noise quote count is going to make it all right for those trying to sleep at night in the direct flight path – As stated already, many of the aircraft will be under the radar, as the bar is set at 90db. So as many as possible can be flown by the airlines and the victims trapped will be considered insignificant.

22 6.2 The future development plans discussed in this chapter do not form part of the proposed Relevant Action and would all require further consents (and environmental assessments as required) before they can be implemented.

So the future development of Dublin airport do not form part of the proposed Relevant Action , so why is it being discussed and part of this Additional Information – this is to

influence the Bord to consider this application F20A/0668 is a part of the full Dublin Airport project - which is not at all fair to the appellants, those suffering misery in the summer, and holiday periods with constant nonstop, take offs from north runway (70% Mode 7b)

I appeal to the Bord to please consider the humans affected - as the solutions in place do not reflect the significant life-changing affect of an invasion of aircraft, 24 hours a day .

AIR NOISE & VIBRATION - Additional Information.

13.3.28 - There is no clearly accepted method of how to rate the magnitude of the effect of a change in the absolute air noise level and the associated change in noise level.

The applicant uses the UK Planning practice Guidance. I can assure the Bord , during the summer, with Aircraft taking off from North runway, registered 90db and over 90db LAfmax outside in my garden and these aircraft take off every 2 minutes. The actual experience for homes in the flight path is truly torturous and mentally debilitating . As I mind my young grandchildren, and teach music lessons , this is not the environment suitable for learning and development. **The fact an oral hearing was not permitted on this appeal , and following the oral hearing in 2006, the Inspector had access to the audio noise of the aircraft and recommended the refusal of the construction of the runway, based on the human health impacts.**

Now we see this totally ignored, an oral hearing denied , by those directly impacted, and a decision by the Bord to follow, knowingly aware of this, will grant to the applicant, dominance, superiority, and an unfair advantage in this application to ABP.

Since 2007 on the grant of permission by ABP with 31 conditions, DAA have continually undermined the conditions and blatanty ignored the importance of the planning laws – from 2007 to date. The late action of FCC , 11 months after the opening of the north runway in serving an Enforcement Notice makes it all the more wrong.

Those adversely impacted were protected by condition 3(d) and condition 5 and also with condition 7 and 9 , to include a voluntary Insulation Scheme and Voluntary Home Purchases Scheme . It is ironic that ANCA have been appointed the Noise Regulator for Dublin Airport by the government – (part of FCC but supposed to be independent) and answer to DAA *who fund ANCA through FCC.*

ANCA fully agreed to the application F20A/0668 and even granted over double the Noise Quota counts, to permit unlimited aircraft to fly from Dublin Airport. Then FCC granted DAA the permission, with an Enforcement order, following pressure from affected residents and *councillors, after that – which in itself is contradictory.*

The plight of those suffering torturous aircraft noise, with the alternatives for some, not acceptable, and others with no alternatives, is now in the hands of ABP.

The Statement of Need provided by the Applicant States the external noise at Millhead is 67.2 db Laeq 16hr – but no Lamax levels were taken.

daa

DUBLIN AIRPORT
NOISE INSULATION PROGRAMME

Statement of Need

Anderson Acoustics

Building ID	35577761
Address	Millview, Millhead, St. Margaret's, K67 A364
Conservation area	No
Protected structure	No
Dwelling description	A detached house comprising a kitchen, living room, conservatory extension, utility room, 2 bathrooms and 4 bedrooms on the ground floor and a living room and loft conversion on the first floor. The external walls are formed of dense concrete block throughout the property. The existing glazing is aluminium frame throughout with 4/12/4 mm double glazing in all rooms. The conservatory contains two double glazed Velux windows. The roof is pitched and formed of concrete tiles . A fireplace is present in living room. Passive through-wall vents are present in all bedrooms, living room and utility room.
Security Alarm System	No
Roof Void	Approx thickness existing insulation: 100mm Access hatch(s) to all roof voids: Yes
Areas of building not covered by noise mitigation upgrade works	
External noise level	67.2 dB $L_{Aeq,16hour}$ (from Noise Model: 2022 summer noise levels at dwellings)
Owner	Sheelagh Morris
Statement of Need	An assessment has been carried out to determine the specification of products available under the daa Noise Insulation Programme that are most suitable for the property. These are detailed on page 3.

Note the External noise level of 67.2db Laeq 16hr (from noise model 2022 Summer noise levels at dwellings)

The actual noise level in my garden was from 80 – 96db - LAfmax. The noise levels inside my bedroom currently, taken from the APP – Disabel X - 69-70 db LAfmax.

In the RNIS – Condition 7 – the document states on page 11

"However in some instances where the elemental analysis demonstates very high level of noise insulation is already being provided by the existing building construction this improvement may not be possible

It also states:

Where the Statement of Need states that the minimum target of 5db cannot be achieved then the owner will have access to a third party review by a qualified acoustician paid for the daa. The acoustics report will be taken into account in refining the Statement of need for that individual dwelling.

The home buyout for those in the direct flight path , with a market value plus 30% is not covered in this Additional information and does not reflect the value of ones life, identity, place of belonging, community and replacing a forever home that is now taken, with the outdoor room, the most important room, the garden.

The costing of the human disturbance has not been factored in.

Conclusion.

DAA are seeking to remove Conditions 3(d) and Condition 5 from PL06F.217429 - F04AA/1775 . These conditions are part of the 31 conditions issued to permit the construction of the runway. There are the conditions to be adhered to – to protect the amenities of those in the flightpaths. This has not been the case with a stay now in place on the 65 movements by the High Court.

The information submitted and additional information, repeating what has already been submitted, does not

eflect the impact of the actual SELs, the peak Lamax on the HSD population.

The additional information focuses the minds of ABP on the awareness of the future of Dublin Airport – i.e to increased the cap from 32m to 40million pax. This planning *application is being submitted on 19th December – ironically the same date F20A/0668 was* submitted in 2020 with a high court decision pending on the enforcement order by FCC on breaching 65 ATMs (11pm – 7AM – Condition 3(d)) This is not the issue in this planning

application – THE ISSUE IS BREACHING THE 65ATMs on South Runway and taking two additional hours from the night time restrictions on North Runway.

The awakening report is about how many times a person awakes at night. Where is the study in Ireland that can be validated, that a normal sleeper awakes an average of 8 times every night. There is none. This is written to justify the case for additional hours at night and unlimited flights from South runway.

So in June, a hot summers night at 11pm with charters, scheduled flights taking off every two minutes, one will not go to sleep at all. The body and mind cannot wind down to relax to fall into a peaceful and full sleep., after 16hours of day flights.

It is not acceptable that ANCA can call the shots with regards to the NQS – absolving DAA and the airlines from any responsibility. The airlines can massage the details to suit the NAO and tick the procedure boxes.

So we now have a cosy set up – where everyone is responsible and no one is responsible. ANCA are set up as a regularatory body – at arms length - by the Government – Taoiseach – Dept of Transport – and interact with FCC in relation to planning applications – with DAA sqare-ing the circle

This is not a balanced approach and what has been approved by ANCA on behalf of DAA is not acceptable to those adversely affected.

Meanwhile, human receptors suffer collateral significant life-changing impacts.

ANCA are in direct conflict with DAA as the Aircraft Noise Competent Authority are answerable to daa only ,with a revolving circle of communication to agree a policy and procedure for airlines at Dublin Airport.

ANCA permitted 16,260 Noise Quota Counts – when the original number applied for was 7990 – over double – why? It is very clear ANCA were including the cap removal of 32 million passengers in their recommendations and decision to FCC to grant the increased Noise Quota counts predicated on 40 million passengers.

So this application was submitted with the 32m cap also as part of it in words, only in the background the follow up with a separate application to adjust the 32m to 40million .

This new part of the pre-planning consultation between DAA and ANCA - which is available to see, is now being lodged on 19th December 2023, just in time for the Christmas season and before year end.

The Voluntary Insulation has yet to be tested on homes in the direct flightpath and cannot be validated at this point. DAA have stated in the documents relating to Condition 7 that

Where possible 5-10db improvement in sound insulation performance to meet with the WHO and BS8233:2014 . 40db is the maximum noise level per the WHO .

The Applicant response does not answer clearly the significant issues relating to the impact on human receptors in the flightpath and I appeal to the Inspector to seriously consider the full impact, in the broader terms, and

refuse the removal of Condition 3(d) and Condition 5.

65 ATMs on south runway from 11pm – 7am

and no flights from 11-pm -12pm and 6am – 7am on north runway – as start and finishing sleep times.

The CONDITIONS SHOULD REMAIN IN PLACE – to protect the residential amenities for those in the flight paths – THE Longitudinal Corridor.

Sheelagh Morris & Others.

Millhead

St Margarets

Co Dublin

K67 A364

Attached : Longitudinal data from DAA – follows as attachment.

Sheelaghmorris@gmail.com .

Please acknowledge + Receipt by email

Thank you .

Sheelagh Morris .

Attachment

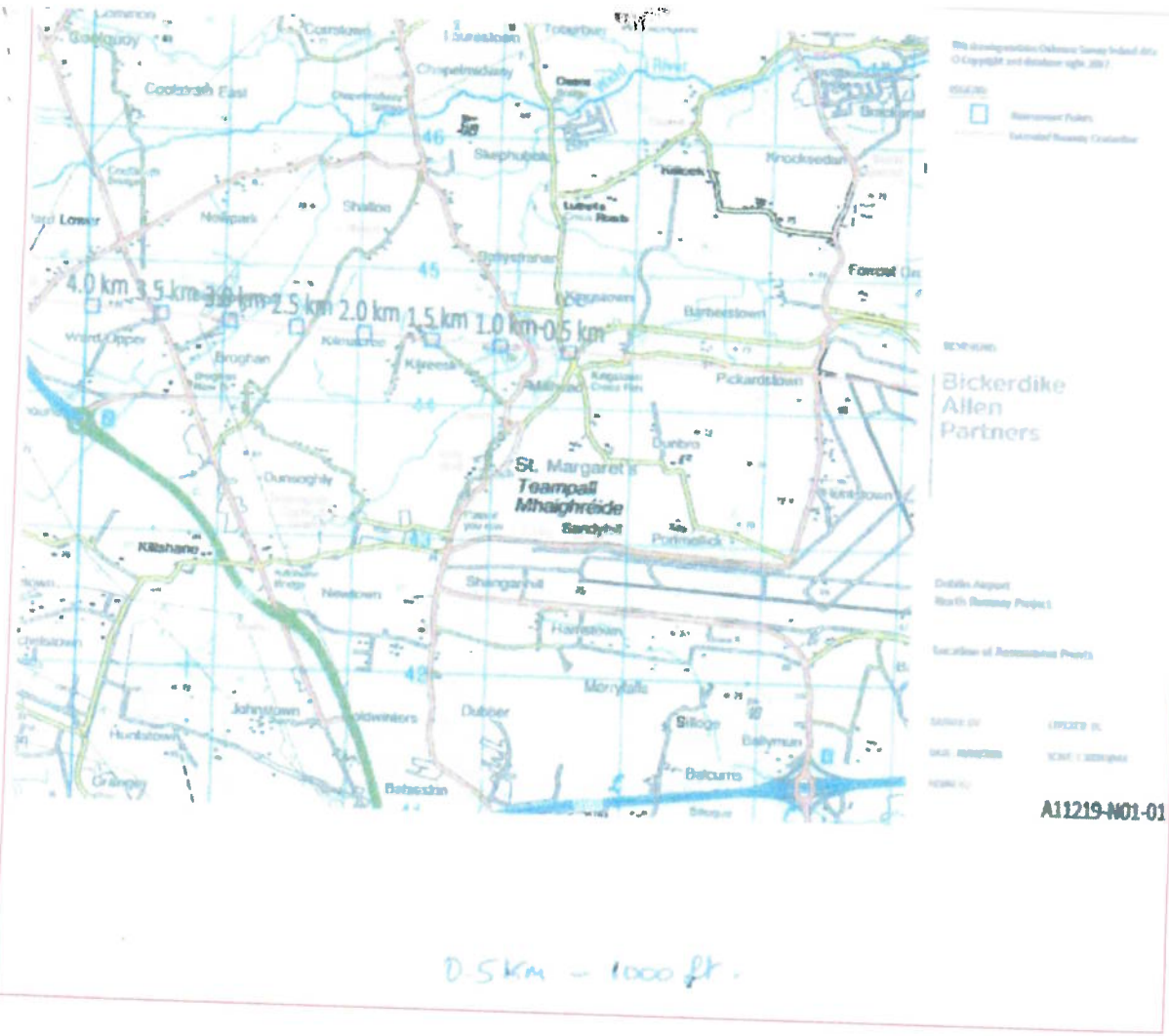
Longitudinal Data

Relating to Longitudinal Corridor

August 2018.

SEL. / LAmax.

Sheelagh Morris + Others.


4.0 km
3.5 km
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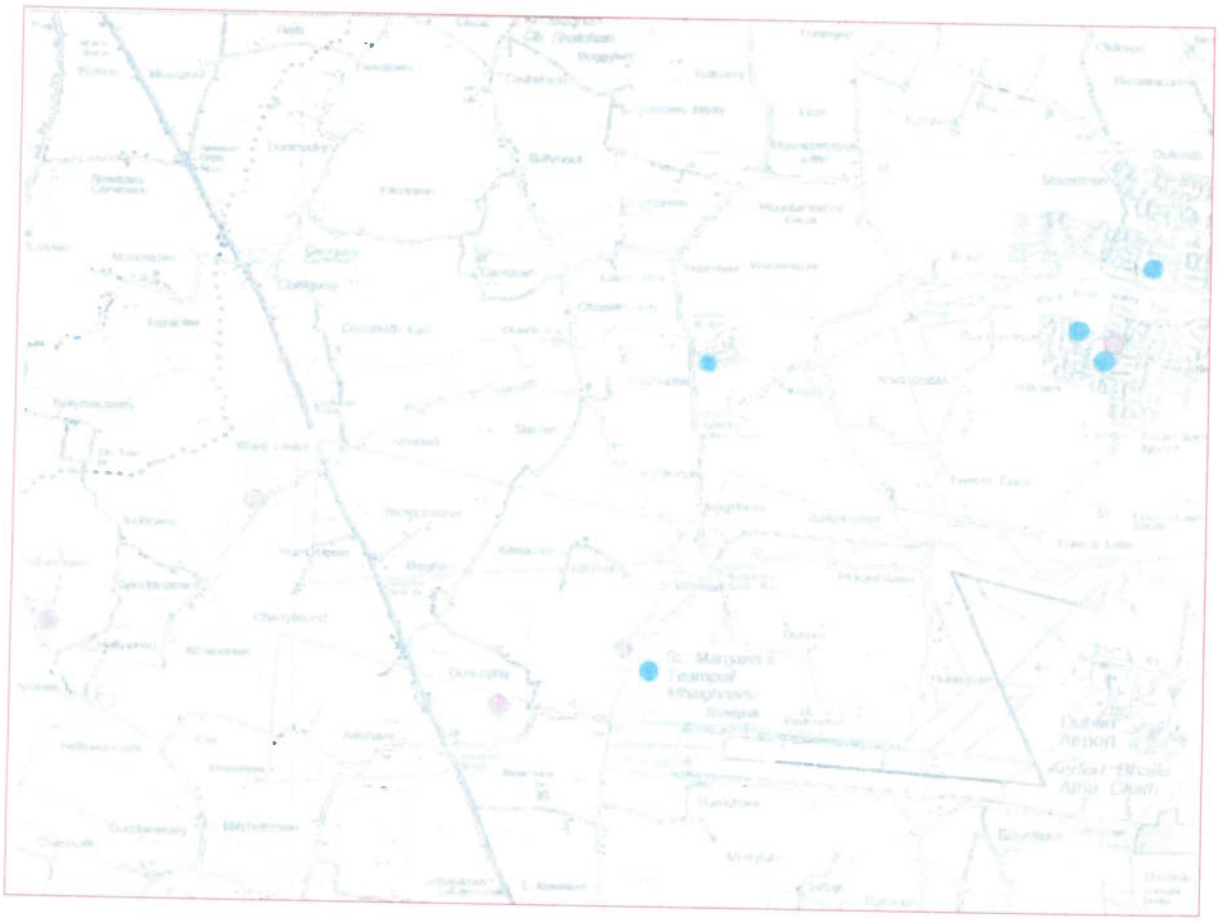
St. Margaret's
Teampall
Mhaighréide
Bickerdike
Allen
Partners
A11219-M01-01

0.5 KM - 1000 ft.



Bickerdike Allen Partners

DUBLIN AIRPORT

A11219-N01-DR

29 August 2018

'LONGITUDINAL ANALYSIS' – L_{Amax} AND SEL NOISE LEVELS

1.0 INTRODUCTION

Bickerdike Allen Partners LLP (BAP) have been retained by daa to predict the levels of airborne aircraft noise from individual movements close to the airport. That is from departing aircraft shortly after take-off and from arriving aircraft shortly before landing. This information has been provided in accordance with a request from the St. Margaret's Concerned Residents community group.

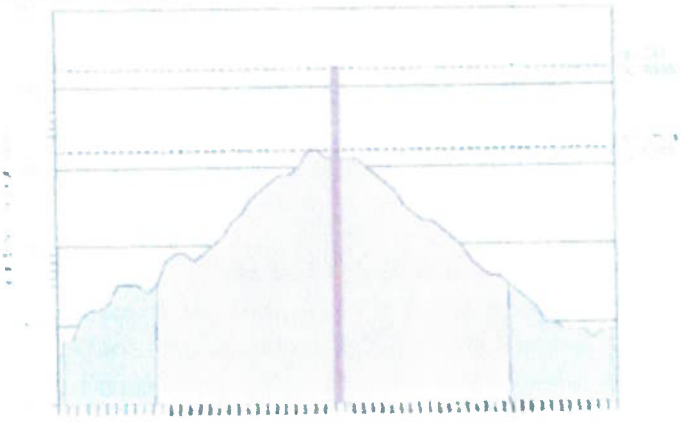
BAP have predicted the noise for six key aircraft types that either currently operate, have operated, or are forecast to operate in the future at Dublin Airport. The noise levels have been predicted for both arrivals and departures at eight points ranging from 0.5 to 4 km, in 0.5 km steps, from the west end of the permitted North Runway along the extended runway centreline. The points are shown in the attached drawing A11219-N01-01. This note reports these predicted noise levels and details the methodology used in their calculation.

2.0 METHODOLOGY

Noise levels have been calculated using the Federal Aviation Administration (FAA) Integrated Noise Model (INM) version 7.0d. The same software was used for the noise mapping of Dublin Airport undertaken for the Environmental Protection Agency (EPA) in 2017.

Noise levels have been calculated in terms of both L_{Amax} and Sound Exposure Level (SEL). L_{Amax} is the maximum instantaneous sound pressure level of an aircraft movement. SEL is a measure of the total noise from an aircraft movement. The SEL noise level for an aircraft movement is the sum of all the noise energy for the event expressed as an average noise level for 1 second. This is shown in the figure below. By adding the SELs of all of the operations at the airport over either 16 hours or 8 hours for the daytime and night time periods respectively and then averaging you get the $L_{Aeq,T}$ average noise contours.

Figure 3.1: Aircraft take history, showing maximum level L_{Amax} and associated Sound Exposure Level (SEL)[1]



The predictions assume the permitted North Runway is in operation. Arrivals have been modelled as using Runway 10L and departures have been modelled as using Runway 28R, both of these overfly the area to the north west of the airport. Arrivals and departures have been modelled using straight routes, that is along the extended centreline of the North Runway.

Noise levels have been calculated for six key aircraft types:

- The Boeing 737-800 and the Airbus A320, which are the current most common aircraft types at Dublin Airport and in 2016 they performed around 37% and 23% of the total movements respectively;
- The Boeing 737 MAX8, which is forecast to be the most common type in the future, but doesn't yet operate in significant numbers;
- The Airbus A330-300, which is the current most common wide-body aircraft and in 2016 performed around 2% of the total movements;
- The Airbus A380, which is the largest aircraft forecast to operate at Dublin, but doesn't currently operate at Dublin;
- The Boeing 737-200, which is an older aircraft type that used to operate in large numbers, but no longer operates at Dublin. Noise levels have been provided for the Boeing 737-200 to illustrate how aircraft technology improves over time and that each generation of aircraft is quieter than the previous.

3.0 RESULTS

The L_{Amax} and SEL noise levels rounded to the nearest decibel are given in Tables 2 and 3 below.

Operation	Aircraft Type	Noise Level, dB L_{Amax}							
		0.5 km	1.0 km	1.5 km	2.0 km	2.5 km	3.0 km	3.5 km	4.0 km
Departure	Airbus A320	86	83	78	78	77	77	76	76
	Airbus A330-300	91	90	89	88	87	83	82	81
	Airbus A380	89	88	87	86	85	84	83	83
	Boeing 737 Max8	87	84	81	79	78	77	77	76
	Boeing 737-800	90	87	83	81	80	80	79	79
	Boeing 737-200	96	94	93	92	90	87	86	85
Arrival	Airbus A320	94	90	87	85	83	81	80	79
	Airbus A330-300	97	93	90	87	86	04	83	82
	Airbus A380	95	91	89	87	85	83	82	81
	Boeing 737 Max8	94	90	87	85	83	81	80	79
	Boeing 737-800	94	90	87	85	83	81	80	79
	Boeing 737-200	94	90	88	86	84	82	81	80

Table 2: L_{Amax} Noise Levels at Assessment Locations

Operation	Aircraft Type	Noise Level, dB(A) SEL							
		0.5 km	1.0 km	1.5 km	2.0 km	2.5 km	3.0 km	3.5 km	4.0 km
Departure	Airbus A320	94	92	89	88	87	87	86	86
	Airbus A330-300	99	98	97	96	95	92	91	90
	Airbus A380	97	96	95	94	93	92	92	91
	Boeing 737 Max8	95	93	89	88	87	85	85	85
	Boeing 737-800	97	95	92	90	89	88	88	87
	Boeing 737-200	104	103	101	100	97	95	94	93
Arrival	Airbus A320	99	96	94	92	90	89	89	88
	Airbus A330-300	101	99	97	95	94	93	92	91
	Airbus A380	100	98	96	94	93	92	91	91
	Boeing 737 Max8	96	94	92	91	90	89	88	87
	Boeing 737-800	97	95	93	91	90	89	88	88
	Boeing 737-200	97	95	94	93	91	90	90	89

Table 3: SEL Noise Levels at Assessment Locations

The INM noise modelling software includes a database of aircraft types and associated noise performance data. It is possible to refine this default data by a validation procedure to better predict aircraft noise around an airport based on actual noise monitoring data where this is available. At Dublin, the permanent noise monitoring and flight track keeping system provides this opportunity.

BAP have validated the default INM noise predictions for the most common aircraft at Dublin by comparing predicted noise levels with the noise levels measured at the airport's noise monitoring terminals (NMTs). Based on the validation exercise modifications have been made to the default INM noise predictions for the Boeing 737-800, the Airbus A320 and the Airbus A330-300. An aircraft type for the Boeing 737 MAX8 is not included in the INM, therefore the noise levels have been predicted for the Boeing 737-800 with an allowance made for the lower noise levels of the MAX8. This allowance has been based on the assumptions used by ECRD in their work for the Airports Commission in the UK[1].

Departures by the single aisle aircraft have been modelled as using intersection take-offs, whereas departures by the wide-body aircraft have been modelled as using the full runway length, as is expected to be case once the runway is operational.

Bickerdike Allen Partners

4.0 SUMMARY

The noise levels for arrivals and departures by six key aircraft types have been predicted for operations on the permitted North Runway.

Duncan Rogers	David Charles	Peter Henson
for Bickerdike Allen Partners LLP	Associate	Partner