

## Opening statement of St Margaret's The Ward Residents Group to Oireachtas Transport Committee, March 1<sup>st</sup>, 2023

Members of the committee, good afternoon. Thank you for inviting us to present our situation to you regarding the manner in which the daa is operating Dublin Airport since the opening of the North Runway in August 2022. We today are represented by three residents of St Margaret's and The Ward, Pearse Sutton, Niamh Maher and Liam O'Gradaigh. Each of us live in the area and are directly affected by the operation of the North Runway. My name is Pearse Sutton I am a chartered engineer with over 30 years' experience working on some of the largest developments in the state. Liam is an experienced data scientist and engineer, and Niamh is a medical consultant. Some of us grew up in the area and have long family ties to the St Margaret's and The Ward and others have moved here more recently choosing to do so in full knowledge of the planned North Runway and trusting the information provided by both daa and Fingal regarding how the runway would operate. We want to also state that while we are part of the St Margaret's The Ward Residents committee, we are also representing other communities of Fingal and East Meath who are also significantly affected by the operation of the North Runway. These communities are united together as the Fingal Organised Residents United Movement (F.O.R.U.M).

Today we will present the facts of the situation we face since the North Runway began operations in August 2022. We will demonstrate how the operations are nothing like what daa presented in the only grant of planning they have for the North Runway, which is the planning granted by An Bord Pleanála in 2007 following a lengthy oral hearing. Some of our members were involved in the oral hearing at that stage and fought hard for protections against excessive noise impacts for our communities, something the daa now are disregarding in the most frustrating way.

We also must state that we are not against Dublin Airport and recognise the importance the airport has to Ireland. However, we do not believe that the needs of Dublin Airport can be put ahead of our homes, our children's and grandchildren's education and our health. Dublin Airport cannot operate on the premise that its needs come at all costs to the environment we live in. We will show today how we have not been engaged with by daa and that they have not operated in a neighbourly way towards us. We simply ask for your support to achieve a situation where we are treated fairly and daa follows the procedures that are in place for proper planning in Ireland.

We have provided each of you a booklet of supplementary information and at times during this opening statement we will refer to pages of the booklet where you can view maps or other supporting information. To begin with, the reason we are here today is that daa are not adhering to the strict environmental conditions attached to their planning permission for the North Runway which was granted in 2007. Daa have been into this committee and recently stated that they are operating the North Runway in accordance with the planning permission they have since 2007, that is not the case. As a result of the current operation of the North Runway daa are inflicting unnecessary, unanticipated, and unacceptable noise pollution on communities that should never have been so badly affected. Daa have apologised calling it an "unanticipated variance" which they have publicly stated has now been resolved by a change to their departure paths which came into place just last week on 23<sup>rd</sup> February. We will show you how these changes have not resolved the fundamental issue which is that they are not following the plans they submitted as part of the planning permission they have been granted. We will also show how the daa are refusing to engage with the community despite their PR statements to the contrary.

St Margaret's is the closest community to Dublin Airport located immediately west of the airfield. The Ward is the townland in which St Margaret's sits and extends to areas further north and west of the airfield. The maps on Slides 5 and 6 illustrate where we are relative to the airport. As a group and a community, we are very familiar with the planning permission which Dublin Airport received for the North Runway and the conditions under which the runway must operate. These conditions are mainly there to protect the environment and the entire North Runway project was subject to an Environmental Impact Statement (EIS) which formed part of the planning application. This is because the scale of the development was such that there was a risk of significant impacts to the environment which triggers the need for an EIS.

Condition No. 1 of the planning permission granted for the North Runway is on Slide 7 of your handout. It states that "The development shall be carried out in accordance with the plans and particulars and the Environmental Impact Statement lodged with the application". The conditions go on to clarify that all additional information and plans submitted to An Bord Pleanála during the course of the planning application assessment and oral hearing must also be complied with.

Critically part of the information that was submitted was a description of how the flights would operate to and from the North Runway. The daa submitted that they would replicate the flight paths used by the south runway which was operational at the time. They clarified that this would result in departures from the runway flying straight out for a distance of 5 nautical miles or until an altitude of 3000 feet was reached. Slides 8 and 9 of the handouts show the flight tracks from the 2007 oral hearing where departures are straight out. Slides 10 & 11 are from the noise abatement procedure daa and IAA developed and submitted to An Bord Pleanála where it is clear that departures would be directed to fly straight for 5 nautical miles and stay within the environmental corridors for the runways.

In 2016 daa submitted compliance documentation to Fingal County Council showing how they would implement the noise insulation schemes for dwellings and schools. Even as recently as this daa presented to Fingal in this documentation that the noise insulation contours they would use for the scheme were based on a combination of the original contour from 2007 plus a revised contour created in 2016 based on more current information. Slides 13 and 14 present this information. As part of their compliance submission, they also submitted a detailed report outlining how they calculated the noise contours and what flight paths were used. Slide 16 highlights an extract from that report again stating that flights were modelled being straight out from the runway for 5 nautical miles before turning. This is illustrated in an image extracted from that report shown on Slide 19.

Many of the houses insulated as part of this scheme are in the St Margaret's area. My own house has been insulated by daa in a process that was only completed during the first half of 2022. Throughout that process all of us who were being insulated by daa were presented with information such as that in the compliance document to Fingal. At no stage during that process was it understood that the operation of the runway would be anything other than what was described to us for decades at that time. Flights would depart the runway in a straight flight path until they reached 5 nautical miles or an altitude of 3000 ft.

It is worth noting that during the oral hearing for the North Runway concerns were raised by local residents about the possibility of flight paths not matching what Dublin Airport were presenting when the runway was operational. This concern was addressed by the Airports own legal counsel who gave his legal opinion that regardless of what air traffic control might require, the runway must operate within the requirements of its planning and that "it would be no defence to say that air traffic control directed otherwise". It is also stated that the Irish Aviation Authority were informed of

the planning application and raised no concern at the time. Slide 20 contains this information for you.

We present all this information along with the backdrop of the significant concerns raised by An Bord Pleanála's inspector and specialist noise consultant during their deliberations following the oral hearing. They were both of the opinion that the introduction of the North Runway would have a significant negative impact on the surrounding area, in particular due to noise. Slides 21 to 24 present extracts from the inspector's report which concluded at the time that permission should be refused for the North Runway due to the impacts of noise, public health, and safety. Concerns were raised about how noise from the new runway would impact schools and the education of children. Night-time noise was considered to be excessive and not adequately addressed in the planning application.

Despite this recommendation to refuse permission, An Bord Pleanála overruled the inspector and granted permission along with a series of conditions restricting the use of the runway at night, a cap on the number of night-time flights at the airport (a number which incidentally was proposed by the airport itself) and insulation and buyout schemes for some affected areas among others. Slides 28 to 31 present these to you.

Now that you have some of the background to what was granted permission and the strict environmental conditions to which the airport had to comply, we want to present the situation we have found ourselves in since the runway opened in August 2022.

Slide 32 presents the straight-out flight paths we expected and that daa received planning permission for. It is overlaid on the 63dB residential noise insulation scheme contour.

Slide 33 adds the actual flight paths operated from the north runway between August 2022 and up until last weeks revised procedure. Aircraft have been diverging north by either 30 degrees or 75 degrees once an altitude of 650 feet was reached. Depending on aircraft type, load and destination this altitude was reached at various distances from the runway resulting in a huge dispersion of flights across the countryside. The vast majority of houses that were insulated were not being flown over. Daa accepted this was an error and took 6 months to implement revised flight paths.

Slide 34 presents the new flight paths in place since 23<sup>rd</sup> February 2023 in green. Flights continue to diverge once 650 feet has been reached and the only difference now is that all flights turn 30 degrees north with some flights now turning again further along the track. The result of this is that there are now more new communities being overflowed that were never expecting to be. Not a single one of these communities would have received communication from daa to warn them this was coming. None of them would be overflowed if daa were operating within their planning and flying straight as per the planning permission they have. This new flight path also impacts on one of our local schools, Kilcoskan NS, which is now directly below the flight path.

Slide 35 adds in noise measurements we as a community have taken at several locations under the flight paths that were in operation during December. First it is worth noting that the number of flights during December is a fraction of what would be expected during the busy summer period. Therefore, the noise levels measured are likely to be underestimating the noise which would be experienced during the busiest time which is what the noise insulation contour is based on. Our measurements show that many areas are experiencing noise levels that should trigger insulation, but these areas are outside the official contour. Daa were meant to insulate houses affected before the runway was operational, but our results clearly show they have omitted many properties who

are now bearing the brunt of the noise in houses not insulated. DAA have not produced any noise monitoring reports since the runway opened.

Thousands of noise complaints have been submitted since the runway opened. Unfortunately, the only mechanism for complaint is directly to the DAA themselves. No other authority will accept aviation noise complaints, not even the Aircraft Noise Competent Authority (ANCA). Instead, we are forced to complain directly to DAA using a very frustrating mechanism that does not allow for a simple email complaint to be submitted. Then when our complaints are submitted DAA have ignored them. All statistics published by DAA for noise complaints in 2022 exclude any complaints related to the north runway. Not a single complaint related to a flight from the north runway has been responded to by DAA. Slide 36 illustrates the real spike in complaints following the opening of the north runway. We have calculated this based on the reference number provided in an automatic reply to each complainant stating the system has received their complaint.

Having lived with the noise and disturbance for 6 months we have significant concerns about the impact this is having on our health. Since the runway was granted permission in 2007 the research into aviation noise impacts on health has progressed greatly. It is now understood the damage that chronic exposure to environmental noise has on your health. Increased risk of stroke, cardiac events, obesity, diabetes etc are all now clearly linked to noise exposure. The World Health Organisation has described noise as an "important public health issue, featuring among the top environmental risks to health". The Lancet in January 2023 published that "action is needed now before noise pollution reaches epidemic proportions." The WHO in 2018 published a report with a strong recommendation that the minimal threshold level of environmental noise which is associated with adverse health outcomes is 40 dB at night and 45 dB during the day.

Aircraft noise is associated with increased 'annoyance', cardiovascular disease, stroke and hypertension. Since 2017, 5 additional longitudinal studies have emerged which strengthen the association further with the metabolic effects of noise to our health. This specifically refers to the increased incidence of diabetes, obesity and sleep deprivation. Even more concerning is the fact that the adverse health implications can begin to take effect from 'chronic' exposure as little as a few months after commencement of the increased noise exposure.

The effect of night-time environmental noise exposure, specifically aircraft noise, takes the damage to our health to another level. Disturbed sleep, which is inevitable with current operations, will significantly affect those living under these current flight paths and will increase the degree of metabolic adverse effects.

In children, not only night-time but daytime exposure to noise, is associated with negative effects on learning, recognition memory and cognition (RANCH project). There are also other long term mental health implications for children, such as an increased incidence of anxiety and depression.

Parallels can be drawn between the long-term negative impact on health due to noise and the impacts that poor air quality, passive smoking or exposure to asbestos had on the health of previous generations. Action needs to be taken now to protect our health and not put the commercial needs of Dublin Airport ahead of the health and wellbeing of our communities. We are calling for a new select committee to be formed where independent international experts on aviation noise can advise government of the potential damage being done to our health by noise. Of interest to us is that this new committee is free to examine current best practice and guidance with regards to the assessment and mitigation of aviation noise impacts. The knowledge base has moved on hugely

since the airport received planning permission for the North Runway. What was considered adequate to protect significant impacts on health then is no longer adequate now.

The North Runway is the newest runway at any international airport worldwide. Dublin Airport should be leading the way in progressive methods to mitigate and control noise impacts on the health of surrounding communities. An independent panel of experts to peer review operations at the airport and benchmark them against current best practice is what we need. That will remove any potential for conflicts of interest to occur in the role of this committee.

As a recipient of the daa implemented noise insulation scheme I can testify that insulation alone is not sufficient to ensure that noise levels in my home stay within values recommended to protect my health and amenity. Needless to say, home insulation also does nothing to mitigate the noise impact on my garden which I used to enjoy fully. There is also a limited voluntary purchase scheme for a very small number of properties in closest proximity to the runway. However, this scheme is not sufficient as most people wish to stay in the area but find that there are no suitable alternative locations available. We advocate that an effective solution for the worst affected areas would be a relocation scheme where those that wish to move are offered a like for like home within the area but away from the noise from the flight paths. We have proposed Thornton Hall as a potential site for this in the past.

Members in summary, we want your support to do what you can to compel daa to engage meaningfully with the communities affected. We want you to ensure daa operate the North Runway and Dublin Airport within the parameters of their planning permission. That is the planning permission they have, not the planning permission they want. All we ask is that there is a fair process and daa are not allowed to continue to do what they like without permission. We also ask that strong consideration is given to the establishment of an independent committee to review the impact of aviation noise on health and to make recommendations to government on how noise can be mitigated. All options should be considered for that including relocation of the worst affected and full and proper insulation for those that stay.

Thank you for your time and we will answer any questions you may have.