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Old Mallow Road
Cork

The Director of Services
Aircraft Noise Competent Authority
Fingal County Council
County Hall, Main St
Swords, Co Dublin
K67 X8Y2

28 February 2022

RE: AIRCRAFT NOISE CONSULTATION SUBMISSION

Dear Sir/ Madam,

Below is my submission regarding the aircraft noise consultation:

- ANCA have erred with the night-time insulation scheme and removed dwellings in The Ward, Coolquay, St Margarets and Killeek Lane. Both ANCA and Ricondo failed to evaluate the full scheme submitted by the daa.
- ANCA and the daa have totally ignored the objective of Target 2 of the EU Action Plan “Towards a zero pollution for air, water and soil” adopted in May 2021 as the targets for 2030 are set at far higher noise levels in 2019 and 2018, which far exceed the baseline year of 2017 required under the EU Action Plan. The selection of 2019 as the baseline is contrary to ANCA’s own SEA document used to screen the project.
- Neither ANCA nor the daa have evaluated the serious health effects, and costs associated with such health effects, of their proposed modification to the current restrictions in place at Dublin Airport. This has serious health implications for the inhabitants within the St Margarets The Ward area.
- ANCA and the daa are proposing noise insulation as a mitigation measure to nighttime noise increases within the St Margarets The Ward communities. This is contrary to Fingal County

Council's advice within their own Development Plan, and testing carried out within the St Margarets The Ward area on housing that has already been insulated by the daa recently indicates the guidance referred to by Fingal County Council and the WHO cannot be achieved and will cause serious health issues of those affected by the proposed increase in night time noise.

- No mitigation measures are proposed by the daa or ANCA to solve the health implications being imposed by the removal of the existing restrictions.
- From the daa's proposal, 79,405 people will be Highly Annoyed and 37,080 will be Highly Sleep Disturbed in 2025.
- Submission from HSE Environmental Health to Fingal County Council states that all efforts should be made to minimize the number of people subjected to the adverse health effects of aircraft noise by reducing aircraft noise levels to below the WHO safe limits of 45dB Lden and 40dB Lnight.
- The selection of 2019 or 2018 as the baseline for noise comparison does not meet the requirements of Directive 2002/49/EC as required by the Aircraft Noise (Dublin Airport) Regulation Act 2019. The escalating noise reported in noise action plans dating back to 2008 have been ignored with respect to reducing and prevention of noise at Dublin Airport.
- From 2016 to 2019 the size of the daytime noise 45dB Lden contour grew from 370km² to 745km²
- From 2016 to 2019 the size of the nighttime noise 40dB Lnight contour grew from 212km² to 328km².
- The figures presented by the daa for 2018 as a baseline are incorrect as during 2018 the crosswind runway was used extensively and therefore the figures are distorted and are not accurate with respect to reviewing the current application.
- At the Oral Hearing in 2007 for the North Runway, figures were presented comparing 2007 levels to a 2025 forecast. The increase in population exposed with the 2025 forecast scenario was deemed unacceptable by An Bord Pleanála's consultant, Mr Rupert Thornely-Taylor. The figures in the daa's current proposal are higher again. In 2007 the forecast noise exposure figures were deemed to be unacceptable from a health point of view. How can they be acceptable now?
- The health effects proposed to be inflicted on the St Margarets The Ward community have not been evaluated by either the daa or ANCA. The real cost due to health effects alone is calculated at more than €600 million per annum due to the proposal.

- The daa and Fingal County Council in the Dublin Airport Noise Action Plan claim that aircraft types have changed in Dublin Airport between 2003 to 2017 resulting in quieter aircraft. However, noise exposure levels grew exponentially in line with movement increases.
- Noise levels submitted by the daa to the St Margarets The Ward group for various noise emissions for specific aircraft types indicate that there is very little difference in the actual measured noise level between the older and newer aircraft. Therefore, the assertions claimed regarding fleet replacements is totally flawed
- Using daa's own forecasts for arrivals and departures there appears to be no reason for proposing a change from the current flight restrictions as there is little or no difference in proposed movements
- The reports on cost effectiveness submitted by the daa exclude quantification of costs associated with the adverse health effects inflicted on residents. This item was specifically requested by ANCA and was not provided by the daa. We in St Margarets The Ward as citizens were expecting this information to be presented to us as requested by ANCA. We refer to our submission on Public Health where we have evaluated the costs associated with the adverse health effects inflicted on us which indicated that the total yearly cost based on the 2019 figures is a staggering 610 million euro. How are we expected to suffer these costs to protect our health?
- The cost effectiveness analysis (CEA) submitted by Ricondo does not meet the requirements of EU598/2014 as it does not take into account of the current flight restrictions in place at Dublin Airport. The report therefore is misleading and inaccurate.
- The cost effectiveness analysis as submitted by Ricondo does not take into account the costs associated with Carbon Emissions nor does it indicate the costs in meeting Ireland's requirements under the Climate Action and Low Carbon (Amendment) Act 2021 for the proposed revision to the current restrictions.
- The EIAR submitted does not meet the requirements set out in the EPA guidance as it does not take into account the foreseeable and planned increase in passenger numbers above 32 million passengers and is considered 'project splitting'.

Yours sincerely,

Mark McElhinney