

From: [REDACTED]
To: [aircraftnoiseconsultation](#)
Cc: [REDACTED]
Subject: Public Consultation on Aircraft Noise (Dublin Airport)
Date: 24 February 2022 11:28:08

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Dear Sir or Madam,

I hereby wish to make a submission to the above-mentioned public consultation. I **object** to the proposed lifting of night-time restrictions at Dublin Airport due to the following reasons:

Regulatory Decision Issues:

- For the Seapark/Robswall area, 15 flights between 6-7am (just one hour!) when operating in the Easterly direction (30% of the time) is enough to cause the average night-time Lnight to exceed the stated 40dB.
- 79,405 people will be Highly Annoyed and 37,080 will be Highly Sleep Disturbed in 2025.
- If the draft proposal is accepted, Malahide will be contained in the 40dB Lnight contour. As a Malahide resident, I am absolutely against this significant increase in night-time noise and carbon emissions.
- The draft proposal makes no mention of exposure to >40dB Lnight for Malahide during the 2016 consultation
- There is no data presented to warrant dual departures between 6-7am
- Dual departures are not allowed under Condition 3 (a-c) of the North Runway Planning Permission and the DAA have not submitted to change Condition 3 (a-c)
- The night-time insulation scheme contravenes the Fingal Development Plan by not adhering to the Noise Zones identifying areas >55dB Lnight
- HSE submission 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.
- Exposure levels beyond the WHO safe limits leads to Hypertension, Cardiovascular disease, cognitive impairment in children, mental health issues
- ANCA have not engaged medical experts in their assessment (only acoustic experts)
- The revised EIAR (Environmental Impact Assessment Report) has far more noise exposure than the initial EIAR
- The DAA's own submission show they can reach 42m passengers in 2040 with restrictions
- Fingal County Council Noise Action Plans show exponential growth in noise

levels which were allowed to grow unmitigated contravening the Environmental Noise Directive (END)

- The Night Quota Scheme (NQS) is not representative of the schemes in the UK as no movement limit is proposed
- The NQS figure of 16260 has been developed to allow for all the DAA's future forecasts (not one flight will be curtailed)
- The NQS does not take account of the number of noise events
- A count of 16260 is far higher than in the UK and should be reduced significantly
- ANCA imposing no restrictions on night-time flights on the South Runway which makes Dublin an outlier amongst European airports. Many other airports have night-time restrictions e.g. Frankfurt, Zurich and still do well economically.
- No health costs assigned in the Cost-effectiveness analysis (Who is going to pay for the health costs associated with night flights?)
- No carbon emissions costs assigned in the Cost-effectiveness analysis (climate crisis, anyone?)

Noise Abatement Objective Issues:

- Noise Abatement Objective (NAO) uses 2019 as its reference year when the planning limit of 32m passengers was exceeded
- The NAO violates Target 2 of the overarching EU Commission's Action Plan "Towards a zero pollution for air, water and soil" adopted in May 2021 which uses 2017 as the reference.

I would appreciate confirmation of receipt of this submission. Thank you.

Yours sincerely,
Clodagh Rochford

Address
[REDACTED] Seapark
Malahide
Co Dublin