

**From:** [REDACTED]  
**To:** [aircraftnoiseconsultation](#)  
**Subject:** Public Consultation on Aircraft Noise (Dublin Airport)  
**Date:** 25 February 2022 12:56:25

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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:

#### **Health/Wellbeing Issues and Violations**

- 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 and mental health issues.
- 79,405 people will be Highly Annoyed and 37,080 will be Highly Sleep Disturbed in 2025.
- ANCA have not engaged medical experts in their assessment (only acoustic experts)

#### **Environmental Pollution/Carbon Emissions Targets Violations**

- 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.

#### **Regulatory Decision Issues/Contraventions:**

- The night-time insulation scheme contravenes the Fingal Development Plan by not adhering to the Noise Zones identifying areas >55dB Lnight
- 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 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.

#### **Comparison to Other European/UK Practices**

- 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.

- The Night Quota Scheme (NQS) is not representative of the schemes in the UK as no movement limit is proposed
- A count of 16260 is far higher than in the UK and should be reduced significantly

**Noise Abatement Objective Issues:**

- Noise Abatement Objective (NAO) uses 2019 as its reference year when the planning limit of 32m passengers was exceeded.

There are obvious negative impacts to the lifting of night-time restrictions in terms of Human Health/Animal Health/Nature and the Environment. As guidelines and best practice are to be ignored by those behind these decisions, some important financial questions and why they have not featured in the "Cost Effectiveness Analysis" are yet to be explained. As part of this objection I also request a clear and succinct answer to the following:

**No health costs were assigned in the Cost-effectiveness analysis**

Questions:

**Have you calculated the health cost associated with night flights?**

**What is the health cost associated with night flights?**

**Who is going to pay for the health costs associated with night flights?**

**No carbon emissions costs assigned in the Cost-effectiveness analysis.**

Questions

**Have you calculated this cost?**

**What is the exact cost of the fines associated with missing our carbon emission targets?**

**Who is going to pay for the fines associated with missing our carbon emission targets?**

I would appreciate confirmation of receipt of this submission and I await an answer to the cost and payment questions asked. Thank you.

Yours sincerely,

Suzanne Trulock

■ Millfield, The Links, Station Road, Portmarnock, D13

