

The Director of Services  
Aircraft Noise Competent Authority  
Fingal County Council  
County Hall  
Main Street  
Swords  
Co Dublin

Sent by email to: [aircraftnoiseconsultation@fingal.ie](mailto:aircraftnoiseconsultation@fingal.ie)

## Re. Aircraft Noise Consultation

28<sup>th</sup> February 2022

A Chara,

An Taisce would like to make the following submission on the above consultation.

We note that Fingal planning ref. F20A/0668, to which the subject consultation relates, proposes to remove the numerical cap on flights and replace it with a noise quota. This would allow for the overall number of nighttime flights to increase.

We consider that Sections 5.50-5.54 of the Strategic Environmental Assessment (SEA) on population and human health are inadequate to meet the requirements of the SEA Directive (2001/42/EC). The potential health impacts caused by aircraft noise are now well researched<sup>1</sup>. However, the SEA does not appear to have analysed the Noise Abatement Objective, the Draft Regulatory Decision or the alternatives presented in the context of the findings of any of this research and no significant data were presented or evaluated. Potential variations in health impacts depending on location relative to the airport were acknowledged, but no substantive analysis of this appears to have been carried out.

The SEA's conclusion with regard to health impacts states: *"Overall, impacts on human health as a result of implementing an NAO (and RD) which specifically targets health outcome improvements, but at the same time facilitates additional night flights, is expected to be mixed."* This statement indicates the likelihood of negative impacts, and we therefore submit that a much more robust assessment is required to fulfil the requirements of the SEA Directive.

---

<sup>1</sup> The World Health Organisation's Environmental Noise Guidelines for the European Region (2018) contains references to many relevant studies (though the list is not exhaustive);  
<https://www.euro.who.int/en/publications/abstracts/environmental-noise-guidelines-for-the-european-region-2018>

Please acknowledge our submission and advise us of any further consultation periods.

Yours sincerely,

Phoebe Duvall

*Planning and Environmental Policy Officer  
An Taisce – The National Trust for Ireland*