

From: [REDACTED]
To: [aircraftnoiseconsultation](#)
Subject: Public Consultation on Aircraft noise (Dublin Airport)
Date: 24 February 2022 21:08:39

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Dear Sir or Madam

This is my formal objection to the proposed lifting of night-time restrictions at Dublin Airport. Numerous issues arise from the proposal in its latest shape and rationale. Above all else, to continue to advocate and facilitate air traffic such as is contemplated begs the question whether, in the context of the climate crisis, economic development will trump every proposal. There may be fears that in given circumstances Dublin Airport may lose out to other EU airports. Many other airports have night-time restrictions e.g. Frankfurt, Zurich and still do well economically. Why not Dublin?

If the draft proposal is accepted, its implications for health and quality of life will be significant. Malahide will be contained in the 40dB Lnight contour. For people like me, elderly and in poor health, this significant increase in night-time noise marks a decline in quality of life. We have a right to protest. My district will see an extra 15 flights between 6-7am which, when operating in the Easterly direction is enough to cause the average night-time Lnight to exceed the stated 40dB. I note that the HSE affirms 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.. This valuable HSE pointer doesn't have a response in the draft proposal; there is no mention of exposure to >40dB Lnight for Malahide during the 2016 consultation; no data are presented to warrant dual departures between 6-7am. The night-time insulation scheme contravenes the Fingal Development Plan by not adhering to the Noise Zones identifying areas >55dB Lnight.

Behind the draft proposal and the ensuing reflections on noise exposure levels, WHO limits that are exceeded, etc lie such unpleasant dimensions of life as 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. 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 current exercise will benefit greatly in terms of the cost-effectiveness

analysis if two gaps are filled. One is the assignment (who pays?) of the health costs associated with the proposed substantial increase in night flights. The other is the opportunity costs of the increased carbon emissions.

I would appreciate confirmation of receipt of this submission. Public Consultation on Aircraft Noise (Dublin Airport)

Maurice Cashell

■ Biscayne, Malahide

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