

Subject: Submission to the Draft Dublin Airport Noise Action Plan 2024-2028

To: Fingal County Council

Dear Sir/Madam,

I am submitting this response on behalf of as local elected representative regarding the **Draft Dublin Airport Noise Action Plan 2024-2028**, representing the concerns of the residents of Dublin Fingal East and the wider affected communities. This submission addresses the long-standing and increasing impacts of aircraft noise and calls for more robust and enforceable measures to safeguard the health and quality of life of residents living near Dublin Airport.

1. Night-time Aircraft Movements: Breach of Conditions and Growing Impact

The draft Noise Action Plan emphasizes night-time aircraft movements, particularly between **23:00 and 07:00**. The **2023 Annual Noise Contours** show an increase in noise exposure, especially affecting those exposed to **55 dB Lnight** and above. The **North Runway Relevant Action (PL06F.314485, F20A/0668)** outlines a night-time aircraft movement limit of **13,000 movements annually** (9,100 in summer and 3,900 in winter) . However, these conditions continue to be breached, leading to significant **sleep disturbances** among residents.

Request: I call for the strict enforcement of the night-time movement limits, ensuring that any breaches are addressed promptly, and sanctions are imposed for any non-compliance. The IAA and Fingal County Council must adhere to these limits, as outlined in the North Runway planning conditions.

2. Failure to Respect the 32 Million Passenger Cap

The **Draft Noise Action Plan** reflects **Fingal County Council's** **commitment** to managing the **long-term adverse effects of aircraft noise on health and quality of life**, particularly during night-time. Despite this, **Dublin Airport** continues to exceed the **32 million passenger cap**, a violation of planning conditions. The airport's manipulation of passenger data, excluding transfer and transit passengers, contradicts international aviation conventions.

Request: The **32 million passenger cap** must be strictly enforced using **CSO figures** as required by **Fingal County Council** and **An Bord Pleanála**. Dublin Airport must not be permitted to sidestep these regulations, and penalties should be imposed for any future breaches. Transparency in passenger data reporting must be mandated.

3. Noise Contours and Population Impact

The **2023 Noise Contours** indicate that **over 423,000 people** were exposed to at least **45 dB Lden** noise levels in 2023 . Similarly, **more than 55,000 people** are exposed to **50 dB Lnight**, marking a significant increase compared to previous years. **Highly Annoyed** and **Highly Sleep Disturbed** populations are projected to increase significantly by 2027 under the future scenario noise projections.

Request: The **Residential Noise Insulation Grant Scheme (RNIS)** and other mitigation measures need to be expanded to cover populations exposed to lower thresholds, including those within the **45 dB Lden** and **50 dB Lnight** contours. The draft decision goes by ABP goes some way in this regard. However, many residents not covered under the current eligibility criteria continue to suffer adverse effects from continuous noise exposure. Insulation programs should also be streamlined for more timely delivery.

4. Flight Paths and Community Disruption

The **North Runway's** divergent flight paths have resulted in severe noise impacts for more than **30,000 residents**, many of whom were never consulted about these changes. They were not consulted in the main as they should have never been materially affected. The original **straight-out flight paths** would have lessened the noise burden, but these were altered without public input, via safety case outside of the planning process. This process has significantly altered the noise contours set out in planning policy and areas affected by noise, and it goes against legislative framework as it breaches the planning agreed,

Request: The **IAA and Fingal County Council** must revert to the original **straight-out flight paths** as outlined in the **2007 Environmental Impact Assessment (EIAR)**. These changes would significantly reduce noise exposure for affected communities and bring flight paths in line with previously agreed upon planning conditions.

5. Balanced Approach and Noise Abatement Objective

The **Balanced Approach** under **EU Regulation 598/2014** is central to noise management at major airports, including Dublin. However, the **Noise Abatement Objective (NAO)** for Dublin Airport is not being met. The **medium**

and long-term targets outlined by the **ANCA** include reducing noise exposure and ensuring that growth at the airport occurs in a sustainable manner. The current trajectory, with increasing night-time noise exposure and breaches of planning conditions, threatens to undermine these objectives.

Request: We urge Fingal County Council and the **Aircraft Noise Competent Authority (ANCA)** to prioritise **night-time noise reductions** and impose strict noise-related operating restrictions if the current noise situation worsens. Dublin Airport must be held accountable for exceeding noise exposure thresholds, and future growth must be aligned with sustainable practices that protect public health.

6. Environmental and Public Health Considerations

The **2023 noise contours** also highlight the increasing environmental and public health risks posed by noise pollution. The number of people **Highly Sleep Disturbed (HSD)** has continued to rise, placing affected populations at risk of adverse health outcomes such as cardiovascular disease, stress, and sleep disorders .

Request: Fingal County Council must take immediate action to implement stronger noise management measures in accordance with **WHO guidelines** and ensure that public health is prioritized in the development and execution of noise action plans.

Conclusion

On behalf of Councillor representing the residents of the affected areas, we urge Fingal County Council to:

1. **Enforce night-time movement restrictions** and impose penalties for breaches.
2. **Strictly uphold the 32 million passenger cap** using **CSO figures**.
3. Expand the **Residential Noise Insulation Grant Scheme** to populations exposed to **lower noise thresholds**.
4. **Revert to original straight-out flight paths** to reduce noise burden on communities.
5. Ensure all actions align with the **Noise Abatement Objective** under **EU Regulation 598/2014** and impose additional restrictions if noise conditions continue to deteriorate.
6. Prioritize **public health** and environmental sustainability in all airport-related decisions.



Cllr. Dean Mulligan

29 River Valley Rise, Swords, Co. Dublin

☎ 087 966 6260 ✉ Dean.Mulligan@cllrs.fingal.ie

DeanMulligan.ie

LET'S KEEP MOVING FORWARD TOGETHER!

