

Submission to IAA Summer 2025

1. Night-time Noise Quota and Impacts on Residents' Sleep

The draft decision proposes a Noise Quota System (NQS) to regulate night-time noise, replacing the current restriction of 65 flights per night. However, the NQS is calculated based on the noise output of each aircraft, rather than limiting the number of flights. This allows for a potential increase in the number of flights using quieter aircraft, which could still disturb residents significantly due to the cumulative effect of multiple flights.

The Board's noise consultant concluded that while the NQS system may incentivize quieter aircraft, it does not address the cumulative impact of increased flights on sleep disturbance. The assessment highlighted that the noise impact, particularly during night-time hours, is more sensitive to intermittent noise events (L_{Amax}) than to the average noise levels across the night (L_{night}).

Recommendation: I urge the IAA to reintroduce a strict cap on the number of night-time flights in addition to the NQS, to prevent an increase in sleep disturbance for residents living under flight paths.

2. Noise Impact and Insufficient Mitigation

The proposal to extend operating hours and increase the number of night-time flights would expose a significant number of new residents to high noise levels for the first time. The introduction of a Residential Sound Insulation Grant Scheme (RSIGS) is a positive step, but it is insufficient to fully mitigate the adverse effects of aircraft noise, particularly as the eligibility criteria only extend to those within the 55 dB L_{night} contour.

However, the Board's noise expert has recommended expanding this insulation scheme to cover areas exposed to 50 dB L_{night} where noise increases by more than 9 dB, and to include those experiencing 80 dB L_{Amax} from aircraft overflights. This would ensure more households are protected from the most disruptive noise events, especially during night hours when sleep is most affected.

Recommendation: The IAA should adopt the expanded insulation eligibility criteria to include residents impacted by 50 dB L_{night} noise and those within 80 dB L_{Amax} contours. This would offer broader protection to the communities affected by increased aircraft movements, particularly at night.

3. Passenger Cap Enforcement and Transparency

The airport has already exceeded the 32 million passenger cap in previous years (e.g., 33.26 million passengers in 2023), and it is expected to breach this cap again in 2024. The IAA must strictly enforce the passenger cap as stipulated in planning conditions, using the official CSO figures to count passengers, including transit passengers, as per Fingal County Council's position. The airport's efforts to alter these figures by removing transit passengers go against international aviation counting conventions.

Allowing continuous breaches of the passenger cap would not only violate planning conditions but also increase noise pollution and environmental impact, as more flights would be required to accommodate the additional passengers.

29 River Valley Rise, Swords, Co. Dublin

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

DeanMulligan.ie

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Recommendation: The IAA must enforce the 32 million passenger cap using official CSO figures and reject any attempts by Dublin Airport to manipulate these figures. Transparent enforcement of the cap is crucial to limiting noise and protecting the quality of life for nearby residents.

4. Flight Paths and Noise from Divergent Paths

The current use of divergent flight paths from the North Runway has resulted in severe noise exposure for over 30,000 residents, with no prior public consultation. This was a significant deviation from the originally agreed straight-out flight paths, which would have minimized the noise impact on residential areas. The noise mapping and modelling in the Environmental Impact Assessment reflect this detrimental change, but residents had no opportunity to contest it.

Recommendation: The IAA should work with all relevant authorities to revert to the original straight-out flight paths as agreed in the 2007 EIAR. This change would significantly reduce noise impacts on tens of thousands of residents, aligning with the IAA's environmental mandate and public welfare obligations.

5. Balanced Approach and Sustainable Development

The Balanced Approach to noise management, as prescribed by EU Regulation 598/2014, emphasizes that noise restrictions should balance operational needs with environmental and public health concerns. While Dublin Airport is essential to the national economy, sustainable development must prioritize limiting long-term adverse effects on residents' health and well-being.

The Noise Abatement Objective (NAO) outlined by ANCA seeks to reduce night-time noise and its adverse effects on health and quality of life. However, the proposed 16,260 aircraft movements under the NQS for night-time hours significantly increases night-time operations, contradicting the objective to reduce the harmful effects of night noise on health.

Recommendation: The IAA must uphold the Noise Abatement Objective and align night-time operations with sustainable development principles by limiting the number of night flights, not just through the NQS but also with flight caps, and by reducing aircraft noise at its source.

Your Sincerely



CLlr. Dean Mulligan

29 River Valley Rise, Swords, Co. Dublin

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

DeanMulligan.ie

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