An tÚdarás Inniúil um Thorann Aerárthaí

Aircraft Noise Competent Authority

Public consultation report

of the Aircraft Noise Competent Authority

November 2026



Part 1: Introduction 4
1.1 Consultation overview 4
1.2 Planning context 5
1.3 Aircraft noise assessment and environmental assessment 5
1.4 Structure of the consultation report 6
Part 2: Public consultation and submissions assessment overview 7
2.1 The process of public consultation 7
2.2 Consultation details 8
2.3 Measures undertaken to promote public participation 8
2.4 Consultation participation and response levels 11
Part 3: Noise Abatement Objective (NAO) 12
3.1 Introduction 12
3.2 NAO overview 12
3.3 Consideration of submissions on the proposed amendments to the NAO 15
3.4 Environmental assessments 46
Part 4: Draft Regulatory Decision (DRD) 58
4.1 Introduction 58
4.2 Regulatory decision overview 58
4.3 Assessment of submissions on the Draft Regulatory Decision (DRD) 60
4.4 ANCA's decision/determination on DRD 111
4.5 Environmental Assessments 112
4.6 Submissions outside of the process of public consultation 120
PART 5: NEXT STEPS 122

List of Tables

Table 2.1 Communication strategy and timelines

Table 3.1 NAO consultation themes

Table 4.1 Draft Regulatory Decision consultation themes

Glossary

AA	Appropriate Assessment
ACP	An Coimisiún Pleanála
ANCA	Aircraft Noise Competent Authority
BA	Balanced Approach
daa	Airport authority for Dublin Airport
DLT	Displaced Landing Threshold
DRD	Draft Regulatory Decision
END	Environmental Noise Directive
ENR	Environmental Noise Regulations
EPA	Environmental Protection Agency
FCC	Fingal County Council
FDP	Fingal Development Plan
HA	Highly Annoyed
HSD	Highly Sleep Disturbed
IAA	Irish Aviation Authority
ICAO	International Civil Aviation Organization
LAP	Local Area Plan
LOAEL	Lowest Observed Adverse Effect Level
MPPA	Million Passengers Per Annum
NAP	Noise Action Plan
NAO	Noise Abatement Objective
NADP	Noise Abatement Departure Procedures
NMT	Noise Monitoring Terminal
NNG	Night Noise Guidelines
NRRA	North Runway Relevant Action
NQS	Noise Quota Scheme
OR	Operating Restriction
RD	Regulatory Decision
RNIS	Residential Noise Insulation Scheme
RSIGS	Residential Sound Insulation Grant Scheme
SAC	Special Area of Conservation

SEA	Strategic Environmental Assessment
SEL	Sound Exposure Level
SIGS	Sound Insulation Grant Scheme
SMART	Specific, Measurable, Achievable, Relevant, Time-bound
SPA	Special Protection Area
VDPS	Voluntary Dwelling Purchase Scheme
WHO	World Health Organization

Part 1: Introduction

1.1 Consultation overview

This consultation report has been prepared to provide a transparent and accountable record of the 14-week process of public consultation by ANCA on the draft proposals of an aircraft noise assessment arising from planning application F23A/0781 for development at Dublin Airport.

The consultation incorporated proposed amendments to the NAO for Dublin Airport (NAO), a draft regulatory decision and associated report, and associated environmental assessments. The report summarises the consultation process, the participation of stakeholders, and the key issues raised in submissions and observations received during the consultation period. It also outlines the consideration of those submissions and observations by ANCA and ANCA's response.

Pursuant to the Aircraft Noise (Dublin Airport) Regulation Act 2019 (the Act of 2019) and the aircraft noise assessment procedures established under that Act and Regulation (EU) No. 598/2014 (the Aircraft Noise Regulation), ANCA conducted a 14-week public consultation on a draft regulatory decision, proposed amendments to the NAO and associated environmental assessments arising from planning application F23A/0781 (the Application).

The consultation documentation was available for public inspection from 28 May 2026 to 03 September 2026 through an online consultation portal. Printed copies of the documentation were also available for inspection and purchase at the ANCA office. During this period, submissions and observations were received from a broad range of stakeholders. ANCA carefully considered all submissions and observations to help inform its decision on the amended NAO and Regulatory Decision (RD). A list of the stakeholders that made submissions to this process is presented in Appendix A of this report. This consultation report outlines how ANCA had regard to all submissions and observations and provides the main reasons for ANCA's decision in relation to the main issues arising from the public consultation.

Although the consultation related to an assessment of the aircraft noise impact arising from planning application F23A/0871, submissions were made that related to other processes which were not within the scope of the consultation. These issues are clearly of concern to the community deserve careful consideration by the appropriate stakeholders but do not come within the statutory remit of ANCA or are not related to the

scope of amending the NAO or making of an RD. These included proposals to amend airspace designs, planning decisions in respect of the passenger capacity, noise complaints, other planning permissions in place at the airport and transport related concerns. ANCA has acknowledged and summarised those submissions and observations in this report.

ANCA wishes to acknowledge and thank all those who participated in the consultation process.

1.2 Planning context

On 15 December 2023, the airport authority for Dublin Airport (daa) submitted an application for development to Fingal County Council in its capacity as planning authority for development at the airport (F23A/0781). The proposed development includes an increase in the permitted passenger capacity at the airport from 32 million to 40 million passengers per year, together with airport infrastructure development projects.

In accordance with Section 34B of the Planning and Development Act 2000 (the Act of 2000), the planning authority referred the Application to ANCA for an assessment of the potential aircraft noise impacts associated with the proposed development.

The assessment considered the aircraft noise impacts of the airport operation with and without the proposed development. During the period of assessment, there were outstanding processes ongoing, the outcome of which may influence the noise climate at Dublin Airport. These include:

- Planning enforcement by Fingal County Council of Condition 5 of the North Runway Planning Permission (F04A/1755; ABP PL06F.217429), which limits average night-time aircraft movements to 65 per night (23:00 to 07:00) over the 92-day modelling period. The enforcement notice has been stayed by the High Court in judicial review proceedings taken by daa;
- The North Runway Relevant Action (F20A/0668; PL06F.314485), for which ACP granted permission in July 2025 with new night-time operating restrictions and noise mitigation measures. That decision is subject to three sets of judicial review proceedings that have been adjourned. On 10 February 2026, the European Commission notified ACP that it did not consider the operating restrictions had been adopted in accordance with the Balanced Approach under Regulation (EU) No 598/2014. ACP is considering its response to that notification.

1.3 Aircraft noise assessment and environmental assessment

ANCA carried out an aircraft noise assessment of the Application through the process prescribed by the Aircraft Noise Regulation, Section 34B of the Act of 2000, and Section

9 of the Act of 2019. As part of the process of regulation ANCA is required to define, restate or amend the NAO for the airport. Accordingly, proposed amendments to the NAO were published for public consultation. ANCA also identified and prepared draft measures to mitigate the aircraft noise impacts arising from the proposed development. These measures were published in a Draft Regulatory Decision (DRD) for the purposes of public consultation. The proposed amendments to the NAO and the DRD require environmental assessment. For this purpose, ANCA is carrying out a strategic environmental assessment (SEA) and has carried out a screening for appropriate assessment (AA) prior to the adoption of the proposed amendments to the NAO and Regulatory Decision.

1.4 Structure of the consultation report

Part 1 – Introduction: provides an overview of the consultation, including the planning, regulatory and environmental assessment context. It outlines the background to planning application F23A/0781, the aircraft noise assessment undertaken by ANCA, and general information on the public consultation process.

Part 2 – Public consultation process and assessment methodology: presents an overview of the public consultation undertaken by ANCA, including the consultation process, stakeholder engagement measures, participation levels and submissions received. It also explains how submissions and observations were reviewed, assessed and incorporated into the consideration of the proposed amendments to the NAO, the Draft Regulatory Decision and associated environmental assessments.

Part 3 – Assessment summary of submissions relating to the NAO (including environmental assessment): examines the submissions and observations received on the proposed amendments to the NAO for Dublin Airport. It outlines the purpose of the proposed amendments, the key changes to the NAO, and ANCA's assessment and response to consultation feedback across the main themes raised by stakeholders. It also includes the consideration of submissions relating to the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) Screening Report.

Part 4 – Assessment summary of submissions relating to the Draft Regulatory Decision and Report (including environmental assessment): A summary of the consideration of submissions and observations received in relation to the DRD, DRD report and the related SEA and AA screening report. It outlines the key themes raised during the consultation process and ANCA's consideration of those issues.

Part 5 – Next Steps: A summary of the regulatory steps that follows the process of public consultation, a decision by the planning authority and independent appeal information.

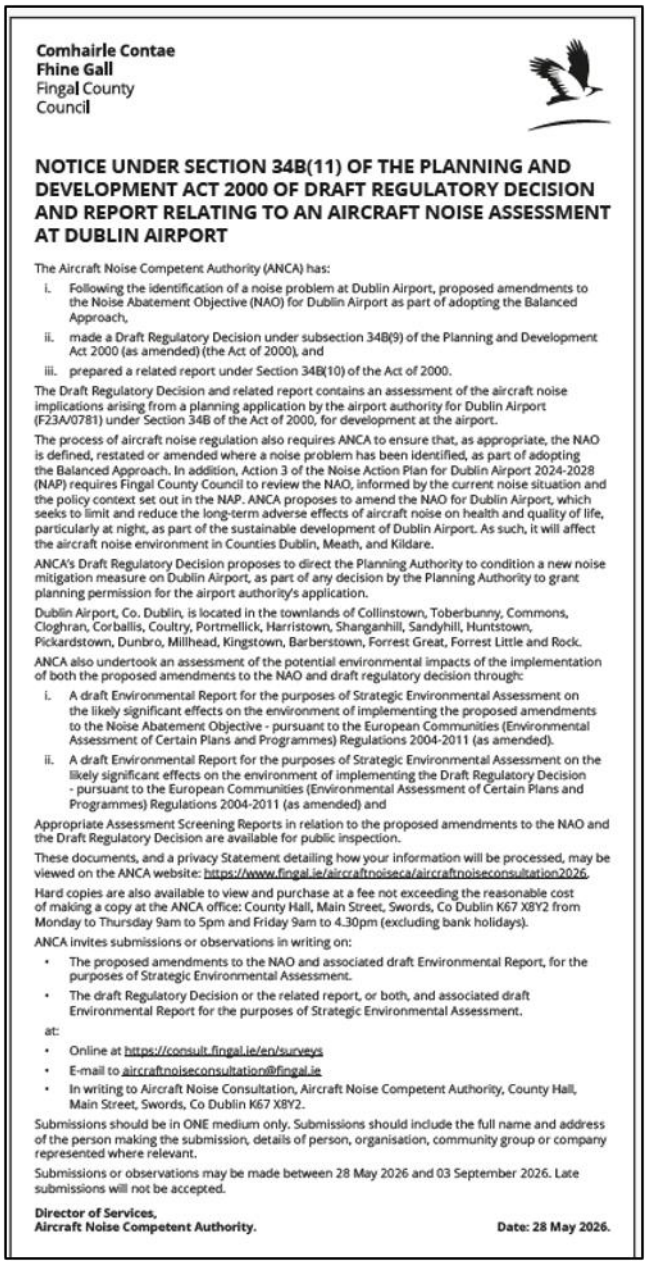
Part 2: Public consultation and submissions assessment overview

2.1 The process of public consultation

The process of public and stakeholder consultation was undertaken through the Fingal County Council online consultation portal,[1] traditional media, and at Fingal County Council's offices. The consultation provided context, information on the constituent parts of the consultation, a link to the online documents associated with the consultation, web maps, and the facility to make an online submission or observations.

The interactive maps on the consultation portal indicated the potential geographic extent of the proposed home insulation scheme for several potential operating scenarios considered by ANCA during the assessment of the development application.

Information notifying persons of the making of the proposed amendments to the NAO and associated draft environmental report, the DRD and associated report and the associated draft environmental report and the procedures for making a submission within the above dates was published on the ANCA website (https://www.fingal.ie/aircraftnoiseca) and in a notice in a national newspaper (Irish Independent) on 28 May 2026 in accordance with the provisions of Section 34B(11) of the Act of 2000.



Comhairle Contae
Fhine Gall
Fingal County
Council

NOTICE UNDER SECTION 34B(11) OF THE PLANNING AND DEVELOPMENT ACT 2000 OF DRAFT REGULATORY DECISION AND REPORT RELATING TO AN AIRCRAFT NOISE ASSESSMENT AT DUBLIN AIRPORT

The Aircraft Noise Competent Authority (ANCA) has:

i. Following the identification of a noise problem at Dublin Airport, proposed amendments to the Noise Abatement Objective (NAO) for Dublin Airport as part of adopting the Balanced Approach,

ii. made a Draft Regulatory Decision under subsection 34B(9) of the Planning and Development Act 2000 (as amended) (the Act of 2000), and

iii. prepared a related report under Section 34B(10) of the Act of 2000.

The Draft Regulatory Decision and related report contains an assessment of the aircraft noise implications arising from a planning application by the airport authority for Dublin Airport (F23A/0781) under Section 34B of the Act of 2000, for development at the airport.

The process of aircraft noise regulation also requires ANCA to ensure that, as appropriate, the NAO is defined, restated or amended where a noise problem has been identified, as part of adopting the Balanced Approach. In addition, Action 3 of the Noise Action Plan for Dublin Airport 2024-2028 (NAP) requires Fingal County Council to review the NAO, informed by the current noise situation and the policy context set out in the NAP. ANCA proposes to amend the NAO for Dublin Airport, which seeks to limit and reduce the long-term adverse effects of aircraft noise on health and quality of life, particularly at night, as part of the sustainable development of Dublin Airport. As such, it will affect the aircraft noise environment in Counties Dublin, Meath, and Kildare.

ANCA's Draft Regulatory Decision proposes to direct the Planning Authority to condition a new noise mitigation measure on Dublin Airport, as part of any decision by the Planning Authority to grant planning permission for the airport authority's application.

Dublin Airport, Co. Dublin, is located in the townlands of Collinstown, Toberbunny, Commons, Cloghran, Corballis, Coultry, Portmellick, Harristown, Shanganhill, Sandyhill, Huntstown, Pickardstown, Dunbro, Millhead, Kingstown, Barberstown, Forrest Great, Forrest Little and Rock.

ANCA also undertook an assessment of the potential environmental impacts of the implementation of both the proposed amendments to the NAO and draft regulatory decision through:

i. A draft Environmental Report for the purposes of Strategic Environmental Assessment on the likely significant effects on the environment of implementing the proposed amendments to the Noise Abatement Objective - pursuant to the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004-2011 (as amended).

ii. A draft Environmental Report for the purposes of Strategic Environmental Assessment on the likely significant effects on the environment of implementing the Draft Regulatory Decision - pursuant to the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004-2011 (as amended) and

Appropriate Assessment Screening Reports in relation to the proposed amendments to the NAO and the Draft Regulatory Decision are available for public inspection.

These documents, and a privacy Statement detailing how your information will be processed, may be viewed on the ANCA website: https://www.fingal.ie/aircraftnoiseca/aircraftnoiseconsultation2026.

Hard copies are also available to view and purchase at a fee not exceeding the reasonable cost of making a copy at the ANCA office: County Hall, Main Street, Swords, Co Dublin K67 X8Y2 from Monday to Thursday 9am to 5pm and Friday 9am to 4.30pm (excluding bank holidays).

ANCA invites submissions or observations in writing on:

- The proposed amendments to the NAO and associated draft Environmental Report, for the purposes of Strategic Environmental Assessment.
- The draft Regulatory Decision or the related report, or both, and associated draft Environmental Report for the purposes of Strategic Environmental Assessment.

at:

- Online at https://consult.fingal.ie/en/surveys
- E-mail to aircraftnoiseconsultation@fingal.ie
- In writing to Aircraft Noise Consultation, Aircraft Noise Competent Authority, County Hall, Main Street, Swords, Co Dublin K67 X8Y2.

Submissions should be in ONE medium only. Submissions should include the full name and address of the person making the submission, details of person, organisation, community group or company represented where relevant.

Submissions or observations may be made between 28 May 2026 and 03 September 2026. Late submissions will not be accepted.

Director of Services,
Aircraft Noise Competent Authority. **Date: 28 May 2026.**

The proposed amendments to the NAO required public consultation under the EC (Environmental Assessment of Certain Plans and

[1] https://consult.fingal.ie/en/content/aircraft-noise-consultation.

Programmes) Regulations 2004. The duration and terms of that process were aligned to the Section 34B process for the Regulatory Decision for convenience of the public.

2.2 Consultation details

On 27 May 2026 ANCA made a draft regulation decision and report and commenced the process of public consultation in accordance with Section 34B(11) of the Act of 2000. As outlined above, the proposed amendments to the NAO for Dublin Airport and associated environmental assessments were carried out at the same time.

The consultation was open for submissions and observations for fourteen weeks from 28 May 2026 at 09:00 to 03 September 2026 at 17:00. All interested persons could review the documentation and make submissions or observations on the following consultation documents:

1. Proposed amendments to the NAO for Dublin Airport.
2. Draft Regulatory Decision and accompanying report.
3. Draft Environmental Report for the Strategic Environmental Assessment of the NAO.
4. Draft Environmental Report for the Strategic Environmental Assessment of the DRD.
5. Appropriate Assessment Screening Report NAO
6. Appropriate Assessment Screening Report Draft Regulatory Decision
7. State of the Evidence for Aviation Noise Effects on Health and Wellbeing

Submissions were accepted in writing during the consultation period by any one of the following three methods:

1. **Online portal**: by completing a web form with option of including a separate attachment (https://consult.fingal.ie/en/content/aircraft-noise-consultationl)
2. **By email**: at aircraftnoiseconsultation@fingal.ie
3. **In writing:** to Aircraft Noise Consultation, Aircraft Noise Competent Authority, Fingal County Council, County Hall, Main Street, Swords, Co Dublin K67 X8Y2.

2.3 Measures undertaken to promote public participation

Extensive efforts were made to maximise public awareness and participation in the consultation process throughout the fourteen-week consultation period. A comprehensive communications and outreach programme was implemented, including the publication of statutory notices and advertisements in national newspaper, promotion through Fingal County Council's social media channels, coverage through television and radio, and provision of information on ANCA's website. In addition, consultation material and information was circulated to relevant stakeholder groups, elected members and local councillors who were encouraged to share the information

within their respective networks. These measures were undertaken to ensure that the widest possible audience was informed of the consultation process and afforded the opportunity to review the draft proposals and make a submission or observation. Table 2.1 provides further details in relation to the communication strategy and timelines implemented.

Table 2.1 Communication strategy and timelines

Date	Notification channel	Communication description
May 2026	(a) National Newspaper	Notice in a national newspaper (Irish Independent) – national circulation approx. 90,000 copies.
	(b) Television and Radio	ii. Press release to media channels and subsequently carried by RTE.ie, 98fm, Dublin People, EuropeSays.com, Radio Nova, Radio Kfm, Irish Independent, The Irish Sun, Newstalk Radio.
June 2026	(c) Fingal PPN website	Fingal County Council Public Participation Network (PPN) newsletter and website.
July 2026	(d) Weekly	Updates, including Q&A video by ANCA Director.
	(e) Fingal PPN	FCC Public Participation Network (PPN) newsletter and website.
	(f) Notice to all Chief Executives	Notice circulated to all county council chief executives for circulation to county and city councillors.
	(g) Notice to FCC elected members and members of Dail Eireann	Notice circulated to all FCC county councillors and the elected members of Dail Eireann in whose constituencies the airport is located.
	(h) Meath County Council website	Published details of the ANCA public consultation on their council website.
	(i) Meath Chronicle website/newspaper	Meath Chronicle published article.
	(j) Roscommon County Council website	Published details of the ANCA public consultation on their council website.
	(k) Flying in Ireland website	Flying In Ireland published article online.
	(l) Meath County Council PPN	Meath Public Participation Network (PPN) website.
August 2026	(m) Fingal County Council - social media	FCC Communications Section: Messages were sent out at regular intervals each week promoting the consultation via Facebook, Instagram, Threads and LinkedIn. A video was also posted via the FCC's YouTube channel (72 views).
Sept 2026	(n) Fingal County Council - social media	FCC Communications Section: Messages were sent out at regular intervals each week promoting the consultation via Facebook, Instagram, Threads and LinkedIn. A video was also posted via the FCC's YouTube channel.

2.4 Consultation participation and response levels

The public consultation attracted a significant level of engagement with a substantial number of submissions received from a broad range of stakeholders. A total of 1,129 submissions were received as detailed in Table 2.2 below. Responses included residents, resident association and community groups, schools, aviation industry representatives, public bodies, tourism interests, transport groups, business organisations, and elected representatives. The significant level of participation reflected the broad interest in the management of aircraft noise at Dublin Airport.

Table 2.2 Number of submissions per channel

Submission channel	Number received
Online portal	186
By email	564
In writing (by post or hand delivered)	379
Total received	**1,129**

Part 3: Noise Abatement Objective (NAO)

3.1 Introduction

Part 3 presents ANCA's assessment of the submissions and observations received in response to the public consultation on the proposed amendments to the NAO for Dublin Airport. It outlines the background and rationale for the proposed amendments, providing context for their development within the implementation of the ICAO Balanced Approach, and summarises the key changes proposed to the 2022 NAO. An assessment of submissions and observations relating to the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) Screening processes, together with ANCA's consideration of the feedback received and its conclusions regarding those environmental assessments is provided in Section 3.4.

3.2 NAO overview

3.2.1 What is NAO?

The NAO is a policy to support noise management decisions at Dublin Airport. It is also a plan to ensure that aircraft noise at Dublin Airport is limited, reduced and mitigated in the context of sustainable development.

The policy and expected outcomes defined by the NAO provide the basis for identifying and determining measures to address the impacts of aircraft noise. Measures identified may require consideration and action from a range of stakeholders that have a remit which can influence the impact and expected outcomes arising from aircraft noise on human health around Dublin Airport as set by the NAO. These include airlines, local planning and development authorities, air navigation service provider, and the airport authority. Noise mitigation measures may also be identified by ANCA by following the process established by the ICAO Balanced Approach.

The policy and expected outcomes defined by the NAO are not binding limits but must be monitored as part of the noise management framework at the airport. The expected outcomes are used to support noise management decisions and only where noise management and mitigation measures alone cannot achieve these outcomes should noise-related operating restrictions be considered and, if necessary, introduced.

3.2.2 Why amend the NAO?

The Application triggered a statutory noise assessment under the Act of 2019, which required ANCA to define, restate, or amend the NAO if a noise problem was identified before considering mitigation measures under Section 9 of the Act. Action 3 of the Noise Action Plan for Dublin Airport 2024–2028 also required Fingal County Council to review the NAO, taking account of the current noise situation at the airport and relevant policy context.

The NAO Report includes a review of the 2022 NAO which considers the noise situation at Dublin Airport and the content as relevant to the Application and as provided by the Noise Action Plan (NAP) which includes a description of relevant policies. The review was carried out having regard for the wider policy landscape affecting Dublin Airport and its surroundings. It considered the current state of evidence with respect to the effects of aviation noise on health, and how the noise situation at Dublin Airport has changed alongside in relation to the surrounding communities.

All five parts of the 2022 NAO were reviewed in the context of the current and forecast noise situation at the airport in order to determine whether the NAO required to be revised in order to better support management of aircraft noise at the airport. Where the review identified aspects of the 2022 NAO requiring revision, the relevant considerations were set out and corresponding amendments to the NAO proposed, as described in the NAO Report. The review identified the following aspects of the 2022 NAO as requiring revision: Policy Objective and Explanation; Measurable Criteria; Expected Outcomes and Monitoring.

The amendments to the NAO:

- aim to provide a robust framework for monitoring and managing aircraft noise impacts associated with the airport operating three-runway airport operations, amending the previous NAO which predated the commissioning of a second parallel runway (north runway - 10L/28R).
- further strengthen the protection of public health through the introduction of more stringent noise targets and additional metrics to track aircraft noise exposure and its effects on residents and sensitive receptors, such as homes, schools, and hospitals, across daytime, evening, and night-time periods.
- provide that the expected outcomes are measured against the noise situation in 2023 rather than 2019. This reflects 2023 as being the most recent situation provided in the noise action plan (NAP) and representative of the airport in its current operational form following the opening of the north parallel runway in 2022.
- take account of the fleet modernisation that has occurred since 2019, which permits the delivery of more stringent outcomes.

The amendments retain a commitment to limiting and reducing the adverse and harmful effects of aircraft noise over time while supporting the sustainable development of Dublin Airport.

3.2.3 Amendments to the NAO for Dublin Airport

In June 2022, through the process of assessment, consultation and regulation, ANCA defined an NAO for Dublin Airport. The NAO was benchmarked against noise exposure from 2019, a year that predated the commissioning of the second parallel runway (north runway 10L/28R) in August 2022.

Through an assessment of the potential aircraft noise impact of planning application F23A/0781 for development projects and an increase in the permitted passenger capacity of the airport, ANCA identified that a noise problem would arise from carrying out of the development as proposed through the Application.

ANCA proceeded to identify mitigation measures through the application of the balanced approach. In accordance with the Act of 2019, this process first requires the NAO to be defined, restated or amended. A detailed review of the 2022 NAO recommended:

- an update of the benchmark reference year to reflect the current noise climate of the airport operating in three-runway format,
- updates to the objective outcomes to achieve greater reductions in the numbers of people classified as highly annoyed and highly sleep disturbed,
- the inclusion of additional metrics that prioritise reductions to the noise impact at noise sensitive receptors,
- the inclusion of monitoring of noise exposure contours above 55 dB L_{den} and 50 dB L_{night}, with the expectation that the Airport's noise output will reduce over time. These noise exposure thresholds are aligned with the noise action planning requirements prescribed by the Environmental Noise Regulations.

The proposed amendments were subject to a process of public consultation for submissions and observations for a fourteen-week period between 28 May 2026 and 03 September 2026.

3.2.4 NAO assessment methodology

To assist in the analysis and presentation of submissions and observations received during the public consultation, the matters raised have been grouped into seven broad themes described in Table 3.1 reflecting the principal issues identified by stakeholders in relation to the proposed amendments to the NAO. The themes provide a means of summarising the key NAO issues emerging from the consultation. This consultation report outlines how ANCA had regard to all submissions and observations and provides

the main reasons for ANCA's decision in relation to the main issues arising from the public consultation.

Table 3.1 NAO consultation themes

Theme Reference	Theme Description
Theme 1	Expected outcomes and measurable criteria
Theme 2	NAO monitoring and reporting
Theme 3	Metrics (WHO/Awakenings etc.)
Theme 4	NAO process, compliance and supporting evidence
Theme 5	Effectiveness of the amendments to the proposed NAO
Theme 6	Health impacts
Theme 7	Additional matters raised

3.3 Consideration of submissions on the proposed amendments to the NAO

This section summarises the issues and matters raised in submissions and observations received during the public consultation on the proposed amendments to the NAO. The issues have been grouped into the eight themes, together with ANCA's consideration of the matters raised and its assessment and response in respect of each theme. All submissions and observations made on the proposed amendments to the NAO during the 14-week public consultation were individually reviewed and considered by ANCA.

Theme 1: Expected outcomes and measurable criteria

Issues raised in relation to Theme 1

Baseline year

A frequent theme of submissions on the NAO related to the proposed amendments to the NAO and the appropriate baseline year against which measurable criteria and expected outcomes should be assessed. Some submissions expressed a preference to retain the 2019 baseline year as the reference point for future monitoring. Those submissions expressed a view that changing to the 2023 baseline does not recognise the increase in airport activity that occurred since 2019. Expressing a contrary view, other participants supported the introduction of 2023 as the new baseline year, recognising that it better reflects the current operating environment at Dublin Airport, including the

opening of the north runway in August 2022, associated operational changes, infrastructure developments, and the return to more typical traffic levels and a growth trajectory following the COVID-19 pandemic. Submissions also acknowledged that 2023 has merit as the first year following the opening of the north runway.

Other observations requested that performance of the noise climate against both the 2019 and 2023 baseline years be monitored and reported.

Fleet modernisation and technological improvements

Submissions also expressed views that the removal of the 2019 baseline prevents recognition of the significant investment by airlines in fleet modernisation already achieved, with the new reductions in HSD and HA measured against the 2023 baseline year being unlikely to be achievable through technology improvements, land-use planning measures, insulation programmes and operational optimisation alone and risks a predetermined future need to operating restrictions.

Noise exposure, flight paths and runway operations

Submissions expressed a view that the 2023 baseline justifies/normalises flight paths that are not accepted as legitimate, north runway operations and changed runway patterns.

Other submissions linked the baseline assessment year to flight paths and expressed a view that a post-2022 baseline would not be lawful in a context where the respondents held a belief that the flight paths, which have been in use since 2022, are unauthorised.

Scale of the proposed reductions

Submissions disputed whether the 20%, 25% and 30% expected outcome reductions in HA and HSD from 2023 are more stringent than the 30%, 40% and 50% reductions from 2019.

Proposed changes to the expected outcomes

Observations were made that proposed the retention of all expected outcomes of the 2022 NAO and opposed the proposed amendments. Submissions also expressed opposition to proposed changes to the expected outcomes of the 2022 NAO with respect to 65 dB L_{den} and 55 dB L_{night}. Other observations expressed a counter viewpoint and supported change to the NAO expected outcomes and additionally requested that the different contributors to aircraft noise exposure be quantified in order to separately address these.

Some submissions suggested that the 55 dB L_{night} expected outcome should be retained and strengthened as a binding limit. Other submissions stated that proposed amendments to the 55 dB L_{night} expected outcome weaken the NAO and should not be

removed. Concerns were raised that the proposed amendments to the NAO are removing clear and enforceable thresholds and risk weakening the regulatory protection. It was stated that the proposed amendments to the NAO are removing binding outcomes.

Observations contained viewpoints that the proposed HA and HSD expected outcomes are not stringent enough. Concerns were expressed that the measurable criteria do not sufficiently protect populations affected below 55 dB L_{night} and 65 dB L_{den}. It was stated in some submissions that harmful health effects are recognised by ANCA from 45 dB L_{den} and 40 dB L_{night}.

Consideration was requested be given to the causes of the change in the number of people exposed to aircraft noise above 65 dB L_{den} and 55 dB L_{night} when refining the expected outcomes associated with these metrics. Concerns were raised regarding reported increases in population exposed above 55 dB L_{night}.

There were concerns expressed in submissions that increases in dwellings or populations within fixed contours can have a negative effect on reported NAO performance even when noise levels remain unchanged. Similar submissions supported the proposed amendments but suggested improvements to the interpolation and reporting of changes occurring within the contours.

Doubt about the achievability or otherwise of the proposed amendments to the NAO, were also expressed. Other observations requested a comparison of the 2022 and 2026 objectives and separation of HA and HSD target outcomes to demonstrate the benefits of different measures.

Submissions requested that an amended NAO should be designed to deliver the recommendations of the World Health Organization's 2018 environmental noise guidelines, not the higher EU Environmental Noise Directive administrative reporting threshold.

Selection of L_{night} and L_{den} as the metrics of the NAO

Some submissions requested that the NAO should be expanded to include or be founded on awakening metrics. Others expressed a position that broad population indicators measuring from 45dB L_{den} or 40dB L_{night} can hide growth in population exposure at higher noise levels.

ANCA response to issues raised in Theme 1

Baseline year

In reviewing the NAO, ANCA considered whether 2019 remained the appropriate reference year for the amended NAO (Consideration 8 of NAO Report).

The amendment of the baseline year from 2019 to 2023 provides the basis for noise management decisions to be based on a noise situation that represents the airport's current operations and the wider demographic situation. When the NAO was consulted on in 2021, it was measured and tested against forecasts provided by Dublin Airport which were based on modelling reflecting noise performance and validation based on activity in 2018 and 2019. This noise situation has changed significantly at Dublin Airport. Since 2022, when the NAO was set, the North Runway has commenced operations, with flight paths and runway operations changing in 2022 as a result. Similarly, the Airport's fleet mix has changed since the Covid-19 pandemic. Accordingly, measuring against noise performance in 2019 is no longer appropriate as that would compare future changes with a situation that has changed significantly.

ANCA considers that given these changes and given the actual noise situation described in the most recent NAP relates to 2023, that 2023 is the appropriate reference year for the amended NAO. The 2023 noise situation as presented in the NAP is based off the current flight paths and runway operations at Dublin Airport, with the situation modelled to consider aircraft flight profiles based on an analysis for their vertical performance using the Airport's radar. The model used aircraft noise performance data which was also validated against Noise Monitoring Terminals (NMTs) around Dublin Airport including those located under North Runway flight Paths.

ANCA therefore considers a 2023 baseline provides for affected communities a more accurate baseline as to where the relevant contours are, how many people are assessed as Highly Annoyed or Highly Sleep Disturbed, and what reduction is targeted for the purposes of the amended NAO. ANCA considers calculating the same numerical reduction against 2019 would produce comparatively far less tangible results.

The proposed amendments also include expected outcomes to reduce the number of people HA and HSD by 20%, 25% and 30% by 2031, 2036 and 2041 respectively, compared to 2023. ANCA considers that calculating the same numerical reduction against 2019 would produce comparatively far less tangible results. With respect to aircraft noise associated with the Application as proposed, ANCA is satisfied that the area exposed to these levels is forecast to remain consistent with or reduce over time compared to the noise situations in both 2023 and 2019. Figure 1 of the NAO Report presents a comparison of the proposals against the 2022 NAO expected outcomes.

Fleet modernisation and technological improvements

Significant reductions in the overall number of people who are highly sleep disturbed and highly annoyed have been achieved compared to 2019 through:

a) fleet modernisation; and
b) additional runway selection options since 2022.

When amending the expected outcomes for the numbers of people HA and HSD from the 2022 NAO, ANCA first had regard to recent changes in aircraft noise exposure, particularly during the period 2019-2023 with respect to fleet modernisation, alongside forecasts made available to ANCA through a number of statutory processes. The improvements in expected outcomes take into account the forecast changing rate of fleet renewal as presented within the Application and independently reviewed for ANCA by Infrata. Achievement of the NAO is proposed to be assessed in line with the ENR and any noise problem identified would then be progressed through the Balanced Approach under the Aircraft Noise Regulation and Act of 2019 with practical and cost-effective measures available under reduction at source, land use planning and management, and noise abatement operational procedures assessed as means to address the noise problem and achieve the NAO, prior to consideration for the potential need for operating restrictions. Conversely, if the number of people HA and HSD reduces at a rate in advance of the expected outcomes; this does not prevent the establishment of targets that further reduce the numbers of people experiencing the impacts of aircraft noise.

Noise exposure, flight paths and runway operations

The design of airspace and the operation of flight paths are significant factors in determining the locations and communities that experience aircraft noise. However, the design and operation of flight paths, and related planning enforcement matters, are outside the regulatory scope of this consultation. Flight paths are designed by the airport authority in conjunction with the air navigation service provider and are subject to separate regulatory and safety processes. ANCA does not have the statutory function to design, approve, alter or enforce individual flight paths. Consequently, requests for ANCA to introduce or require particular flight-path configurations, including straight-out departures, relocated waypoints or corridors, particular altitude restrictions, alternative runway-use arrangements, or changes to arrival routes and holding patterns, cannot be determined through this aircraft noise regulatory process. The NAO objectives are independent of current or future flight paths.

Additional context is provided in the responses relating to the DRD in Theme 7 - Airspace design and operation.

Scale of the proposed reductions

Figure 1 of the NAO Report details the additional reductions in harmful effects, as expressed through the number of people experiencing high annoyance and high sleep disturbance, that can be achieved through the 2023 benchmark year and adjusted percentage target outcomes. This approach is aligned with the metrics and principles of the Environmental Noise Regulations that seek to *'avoid, prevent or reduce, on a prioritised basis, the harmful effects of exposure to environmental noise'*.

Proposed changes to the expected outcomes

To allow ANCA to consider the amount of noise exposure that is produced directly by the airport, separately from changes in both aircraft noise and the number of people that experience it, the NAO was amended to provide consideration of the size of the areas exposed to aircraft noise at 55 dB L_{den} and 50 dB L_{night}.

The amendment of the NAO as a policy framework for the management of aircraft noise considers the current and possible future of aircraft noise at the airport.

Noise contour areas provide a direct understanding of how much aircraft noise is produced by an airport at source. At and above 55 dB L_{den} and 50 dB L_{night}, the areas of these contours will be directly affected by the number of aircraft at different times of the day, evening and night, and the corresponding fleet mix. The size of these contours may also have regard to wider noise abatement operating procedures. By monitoring and tracking these areas, with the expectation that these will reduce over time, ANCA can consider whether the amount of noise being produced by the airport at source is reducing and the role this may play in affecting wider health-related outcomes.

The NAO is a noise management policy which, through the process of aircraft noise regulation, sets strategic outcomes which are expected to be achieved and will guide noise management decisions. The evolution of the noise situation at the airport is assessed under ENR and the NAP which compares the noise situation with the objectives within the NAO. The NAO sets out a policy objective, measurable criteria and expected outcomes and monitoring.

The Noise Action Plan (NAP) 2024-2028 details the regulatory framework and processes for managing aircraft noise at Dublin Airport. ANCA undertook a period of public consultation in relation to the draft NAP 2024-2028 in September 2024. Public submissions were made to ANCA regarding achievement of the NAO target outcomes and requesting amendments to the NAO. The NAP 2024-2028 identifies that the number of people and dwellings exposed above 55 dB L_{den} and 50 dB L_{night} increased between 2019 and 2023. Noise Action No.3 (carry out a review of the NAO for Dublin Airport to support sustainable community and airport development in accordance with relevant plans and policies) was added to the Plan to address these submissions. The NAO Review Report cites Noise Action No. 3 as one basis for review of the NAO.

ANCA considered (Consideration 11 of NAO Report) whether specific outcomes should be set for the proposed 55 dB L_{night} and above 65 dB L_{den} metrics. As set out above, the NAP highlights the increase in population exposed to aircraft noise generated by Dublin Airport operations, particularly within noise contours in the vicinity of the airport where the number of people exposed to noise levels above 55 dB L_{night} and above 65 dB L_{den} has increased in 2023 compared to 2019, and to all the previous rounds of Strategic Noise Mapping since 2006.

ANCA undertook an analysis (as set out in Appendix A to the NAO Report) of population and aircraft noise exposure change around Dublin Airport. This review started with a detailed analysis of the reasons for the increase in the number of people exposed. As part of this analysis, ANCA considered the effectiveness of the noise zoning system introduced by Fingal County Council as a land use planning measure in 2005. Under the FDP, the 55 dB L_{night} represents a level of aircraft noise exposure where noise insulation measures are considered necessary in new developments. Where exposure could exceed both 55 dB L_{night} and 63 dB $L_{Aeq,16hr}$ (equivalent to approximately 65 dB L_{den}) policies under the FDP require that noise-sensitive development be resisted.

The analysis presented in Appendix A of the NAO Report demonstrates that, except for years where aircraft noise from Dublin Airport was affected by, or recovering from Covid-19 travel restrictions, there is evidence that over the period 2006 to 2023, aircraft noise exposure has increased at a rate higher than the corresponding increases in population levels. However, there are also examples where residential development has led to the exposed population increasing at a rate higher than changes in the aircraft noise itself. The analysis provided in Appendix A shows that should aircraft noise at Dublin Airport remain consistent at 2023 levels, then the population exposed to aircraft noise would continue to increase through the building out and occupation of dwellings on land zoned for residential development. To this end, the NAO must account for the effects of development plans and policies with its outcomes set to reflect these.

Land use management is a pillar of the ICAO Balanced Approach and indeed is helping to mitigate noise impacts at Dublin Airport through the provisions of noise zones under the FDP. Appendix A demonstrates that where residential development is granted in Zone B, planning conditions make it a requirement for appropriate noise mitigation measures to be applied to each dwelling unit.

However, the 2022 NAO did not capture the contribution of land use planning and management. Land use planning and management is outside of ANCA's control and is a matter for the planning authority. However, ANCA considers it appropriate to establish metrics through an amended NAO that incorporates the contribution of a broader range of stakeholders that have a function that may influence aircraft noise impact.

Therefore, ANCA considers it is appropriate to make clear the importance of the planning authority's role under the amended NAO, and to include in the amended NAO policy guidance the planning authority can consider within its own functions. The amended outcome sets an expectation that land use management and other measures will be used to mitigate and/or limit the number of dwellings, schools and hospitals exposed. If the NAO objectives are not achieved, it may be that, after consideration of the Balanced Approach, additional noise abatement operational procedure or potentially an OR, not as a first resort but only after consideration of the other measures of the Balanced Approach, could achieve that mitigation or limitation.

ANCA continues to adopt the WHO (ENG 2018) recommended guideline values for aircraft noise within the proposed NAO amendments when defining measurable criteria for its policy objective. This is consistent with the wider objectives of the legislation. The proposed amendments to the NAO incorporate the number of people highly sleep disturbed (HSD) and highly annoyed (HA) as measurable criteria, taking into account noise exposure from 45 dB L_{den} and 40 dB L_{night}, in line with the ENG 2018.

The amendments also include expected outcomes to reduce the number of people HA and HSD by 20%, 25% and 30% by 2031, 2036 and 2041 respectively, compared to 2023. This represents a tightening of the expected outcomes compared to the 2022 NAO, as illustrated in the NAO report. The amendments also bring the dates for those outcomes in line with the reporting cycle set through the statutory process of strategic noise mapping and noise action planning under the Environmental Noise Directive (END) and Environmental Noise Regulations (ENR). The change provides for better alignment between ANCA's functions and the development and delivery of the Noise Action Plan for Dublin Airport.

ANCA considers that the use of the 2023 baseline, together with the adjusted percentage target outcomes, provides for additional improvements in health outcomes, as expressed through reductions in the number of people experiencing high annoyance and high sleep disturbance.

The selection of the 55 dB L_{den} and 50 dB L_{night} noise contour areas for tracking the noise produced at source by airport operations is consistent with the thresholds defined for reporting aircraft noise under the ENR. It is also at these levels of noise exposure where specific noise abatement operating procedures are most likely to be identifiable.

The retention of the 65 dB L_{den} and 55 dB L_{night} metrics for tracking the exposure of specific populations and noise-sensitive buildings to high levels of noise exposure aligns with wider WHO guidance on wider health risks associated with long-term exposure above these thresholds, where specific receptor-based interventions, land use planning measures, alongside efforts to reduce noise at source, are necessary.

Selection of L_{night} and L_{den} as the metrics of the NAO

Having regard to submissions stating that the NAO should be based on awakenings or other metrics, ANCA commissioned an independent health review report by Professor Charlotte Clark that was included as part of the documentation with the public consultation. This report "*State of the Evidence for Aviation Noise Effects on Health and Wellbeing*" was to ensure there was robust scientific evidence to support decision-making in relation to the selection of metrics for the management of aircraft noise. This report considered *awakenings* metrics and concluded that awakening contours form an important additional tool for estimating and managing the effects of aviation night-noise, but evidence suggests that they do not identify additional health effects beyond those

identified by other means or metrics. For this reason, ANCA retains the L_{den} and L_{night} metrics as the primary metrics for quantifying the impact of aircraft noise as aligned with END.

Recommendation on issues raised in Theme 1

Consideration of the submissions raised under this theme does not support change to the proposed amendments to the NAO.

Theme 2: NAO monitoring and reporting

Issues raised in relation to Theme 2

Performance measurement and the Balanced Approach

Submissions proposed that, as part of the annual reviews of the effectiveness of noise mitigation measures and operating restrictions in achieving the NAO, additional detail should be provided explaining the causes of the measured outcomes, with factors such as land-use planning, population growth and airport operations proportionately attributed to those outcomes. Further respondents stated that, to achieve the amended population-based NAO targets, it is important that the land-use planning aspect of the Balanced Approach be considered as part of the performance measurement. Some submissions expressed concern that reported outcomes may give the impression of a deterioration in airport noise performance where changes are attributable to planning decisions rather than operational noise impacts.

Reporting of outcomes and mitigation measures

Other observations proposed that expected outcomes for HA and HSD should be disaggregated to demonstrate the benefits of different measures. Respondents also proposed that NAO reporting should distinguish between mitigation required by planning conditions and airport-funded mitigation.

Responses further proposed that reporting should identify and publish information on newly exposed populations, the worst affected areas, airspace and runway-specific impacts.

Operational impacts and monitoring

Respondents expressed concerns regarding self-monitoring by the airport authority, including the management of noise measurement terminals. Other submissions expressed concern that annual reporting does not adequately capture the operational impacts on affected communities.

Other submissions stated that monitoring only, without targets and action, is ineffective.

HA and HSD metrics and insulation

Responses stated that the HA and HSD metrics do not account for the acoustic benefits to properties that have benefited from existing daa insulation schemes or planning-led insulation conditions.

ANCA response to issues raised in Theme 2

Performance measurement and the Balanced Approach

The noise situation at the airport is assessed under ENR with the NAP reporting and identifying any priorities and any areas for improvement. If these are identified as a noise problem, the process under the Balanced Approach shall be followed in line with Section 9 of the Act of 2019. The amendments to the NAO therefore bring the monitoring of the NAO into alignment with the legislative approach set out under the ENR and the Act of 2019.

The amendments contain SMART (specific, measurable, achievable, relevant, time-bound) objectives that can be monitored and considered in the context of the balanced approach where necessary to ensure that progress against the objectives can be achieved and maintained.

The monitoring and achievement of the NAO are subject to a range of factors including airport operations, aircraft and airline performance, air navigation and wider demographic and population trends which are influenced by planning and development decisions. As part of reviewing and amending the NAO, ANCA commissioned the report *"Analysis of changes in population and aircraft noise exposure around Dublin Airport since 2006"***,** which indicated that the overall changes in population exposure were due to two main factors: a growth in residential developments that has occurred within Zones B and C of the 2019 Airport Noise Zones, and an increment or a different distribution of the noise footprint around Dublin Airport following the opening of the North runway. This demonstrates that achieving the expected outcomes in the amended NAO is reliant on a combination of factors and the roles of various stakeholders.

The amendments to the NAO retain the principle of reducing harmful effects which are primarily measured through reductions in the number of people HA and HSD which ANCA considers represent the primary objective of the wider legislation, i.e. the ENR and Aircraft Noise Regulation. The addition of metrics which track the number of people and noise-sensitive buildings exposed to high levels of aircraft noise seeks to monitor and support stakeholders in developing wider strategies and policies that can avoid such outcomes from occurring. This is underpinned by ANCA advising the Planning Authority to review the existing Noise Zones and a response by the planning authority indicating the intention to review them as part of the review of the development plan. The inclusion of contour area outcomes intends to help ANCA isolate changes in health-based

outcomes from the amount of noise produced by airport operations at source. By tracking the contour areas, this can help ANCA differentiate between increases in noise exposure due to airport operations from wider societal and demographic changes.

The NAO Guidance Note proposes that the NAO will be determined every five years in line with NAP cycles under the ENR. As part of the determination, ANCA will consider how the noise mitigation measures contribute towards the outcomes set by the NAO. It is not however intended that ANCA evaluate the outcomes, and the contribution of mitigation measures every year as this does not provide sufficient time to fully establish trends and therefore causality.

Reporting of outcomes and mitigation measures

The annual reporting on the effectiveness of noise mitigation measures will continue to take place under Section 21 of the Act of 2019 and will provide all stakeholders with an early indication as to progress towards expected outcomes. Tracking and monitoring of the number of people HA and HSD, dwellings, schools and hospitals exposed, and contour areas will be provided for via the reports submitted through ENR and annual reports. The achievement of the NAO expected outcomes will be assessed in each relevant year under ENR and will be reviewed by ANCA when identifying and considering noise mitigation measures.

Alongside the amended NAO, ANCA has prepared an accompanying guidance note which sets out how the NAO shall be monitored. The accompanying guidance addresses relevant technical considerations in support of the NAO with respect to its application and interpretation. The guidance covers specific technical aspects of the standard and sophistication of aircraft noise modelling, and information to be reported in support of evaluations against the NAO under ENR and annual reporting.

The guidance note also describes how and when ANCA will formally evaluate achievement of the NAO, which is aligned with the monitoring and reporting cycle under the ENR. This allows progress towards the achievement of the NAO to be monitored and reported under Section 21 of the 2019 Act, alongside wider decision-making regarding the achievement of the NAO to be determined in line with the ENR.

Except for noise insulation, the HA and HSD expected outcomes set by NAO cannot be readily disaggregated to demonstrate the benefits of different measures. When considering insulation, it is possible for ANCA to determine whether properties are insulated through conditions of consent or as part of the Airport's schemes. This is subject to information being reported and being made available to ANCA. ANCA will identify trends in noise outcomes over time and identify how certain operational and demographic changes are likely to have influenced these. This is particularly relevant between noise action planning cycles under ENR and when ANCA comes to determine whether the NAO has been achieved as described in the NAO Guidance Note. This can have regard for any populations that have experienced changes in aircraft noise exposure,

any areas that exposed to different levels of aircraft noise, and the potential reasons for such changes.

Operational impacts and monitoring

It is common for airport operators to fund, implement and manage the network of noise monitoring systems around the airport. The Act of 2019 requires the airport authority for Dublin Airport to ensure that appropriate noise measuring systems are in place at the airport on an ongoing basis. The number of monitors continues to grow and has now been increased by the airport authority from seven in 2020 to 32 in 2025. The programme of expansion of noise monitors was subject to a direction by ANCA.

The proposed amendments to the NAO contain specific and measurable targets for the management of aircraft noise in the communities around Dublin Airport. The inclusion of additional metrics such as contour area outcomes are included to help ANCA isolate changes in health-based outcomes from the amount of noise produced by airport operations at source. By tracking the contour areas, this can help ANCA differentiate between increases in noise exposure due to airport operations from wider societal and demographic changes.

HA and HSD metrics and insulation

Reporting under ENR provides the opportunity for optional reporting of dwellings and people living in dwellings that have special insulation against noise (including that installed pursuant to daa insultation schemes), and where reported, ANCA will use this information to identify the ratio of properties benefiting from noise insulation.

Recommendation on issues raised in Theme 2

ANCA summary response: Consideration of the submissions raised under this theme does not support further amendments to the NAO but does support additional clarifications in the NAO Report to further clarify the role and purpose of the NAO.

Theme 3: Metrics (including relationship to health and disturbance)

Issues raised in relation to Theme 3

Noise metrics (including relationship to health and disturbance)

Submissions expressed concern regarding the reliance on annual average metrics (L_{den}/L_{night}) alone as these can conceal repeated night-time awakening events. Submissions stated that the amended NAO should consider WHO Guideline values (which relate to the level of noise exposure considered relevant to human health) and sleep disturbance metrics (which may relate to the number of events likely to cause sleep effects), while other submissions expressed support for HA/HSD.

Submissions requested the inclusion of additional awakening-based metrics such as N80 (80 dB(A) L_{Amax}) single noise events.

HA/HSD and population changes

A number of submissions queried the appropriateness of Highly Annoyed (HA) and Highly Sleep Disturbed (HSD) as metrics that consider changes in population growth as well as changes in aircraft noise exposure.

Aircraft disturbance and mitigation

Submissions suggested that the absence of awakenings metrics mean that residents may be subjected to repeated aircraft disturbances despite remaining ineligible for mitigation schemes. Respondents raised specific concern that annual-average L_{den} / L_{night} metrics can conceal repeated night-time awakening events.

WHO guidance and health indicators

Submissions suggested that WHO guidance and associated health indicators are measured but do not result in practical consequences or mitigation.

Several consultation responses raised the issue of metrics that rely on noise exposure data that is produced by the airport and whether this data should be subject to assurance or prepared independently.

Other noise metrics amendments proposed in the NAO

Additional submissions were made that disagreed with the rational for the inclusion of additional expected outcomes in the proposed amendments to the NAO.

ANCA response to issues raised in Theme 3

Noise metrics (including relationship to health and disturbance)

The NAO is a noise management policy which, through the process of aircraft noise regulation, sets strategic outcomes which are expected to be achieved that guide and determine noise management decisions. ANCA continues to adopt the WHO (ENG 2018) recommended guideline values for aircraft noise within the amended NAO when defining measurable criteria for its policy objective. This is consistent with the wider objectives of the legislation.

HA/HSD and population changes

The amended NAO incorporates the number of people highly sleep disturbed (HSD) and highly annoyed (HA) as measurable criteria, taking into account noise exposure from 45

dB L_{den} and 40 dB L_{night}, in line with the ENG 2018. The NAO also includes expected outcomes to reduce the number of people HA and HSD by 20%, 25% and 30% by 2031, 2036 and 2041 respectively, compared to 2023. This represents a tightening of the expected outcomes compared to the 2022 NAO, as illustrated by Figure 1 in the NAO report and brings the outcomes into line with the reporting cycle established through the statutory process of strategic noise mapping and noise action planning under the Environmental Noise Directive and Environmental Noise Regulations.

Aircraft disturbance and mitigation

The NAO Report sets out ANCA's considerations in setting metrics for the NAO. To support this exercise, ANCA commissioned Professor Charlotte Clark to undertake a review of the current state of evidence on the effects of aviation noise on human health ('the Health Evidence Review'). The review was published with the consultation and was used by ANCA in support of its functions and decision making, particularly in relation to annoyance, sleep disturbance and awakenings, cardiovascular health, mental health and children's learning associated with aircraft noise.

Following the consultation, ANCA commissioned an update of the Health Evidence Review to consider any new international studies published in 2026 and any specific noise and health research papers submitted as part of the consultation. The updated review is published alongside this consultation report. ANCA's consideration of submissions made to the consultation has been informed by this update.

WHO guidance and health indicators

ANCA continues to adopt the WHO (ENG 2018) recommended guideline values for aircraft noise within the amended NAO when defining measurable criteria for its policy objective. This is consistent with the wider objectives of the legislation.

In preparing the Draft Regulatory Decision, ANCA commissioned a review of the noise modelling carried out by daa. This review concluded that the noise modelling prepared was of a sufficient sophistication to support decision-making. The review confirmed that sufficient evidence had been provided by daa to confirm the validity of the noise modelling.

It is important that such evidence is made available to ANCA to allow ongoing review to be carried out. ANCA has therefore taken the step to prepare an accompanying guidance note which sets out how the NAO shall be monitored, which includes post-validation average measured and modelled L_{ASmax} and SEL values for each validated aircraft type for all NMT locations used for noise model validation purposes. This does not rule out ANCA carrying out its own independent modelling for comparative purposes in the future.

In developing noise management policies, it important recognise the threshold above which adverse effects on health and quality of life from exposure to aircraft noise begin. This concept is described in the WHO Night Noise Guidelines (NNG). It is achieved through the setting of a 'Lowest Observed Adverse Effect Level' (LOAEL), a concept also discussed in the Health Evidence Review.

The application of 45 dB L_{den} and 40 dB L_{night} within the NAO effectively constitutes the setting of a LOAEL for the purposes of measuring aircraft noise outcomes, indicating the point above which adverse effects due to annoyance and sleep disturbance become detectable and therefore measurable with respect to the population highly annoyed and population highly sleep disturbed metrics.

The 40 dB L_{night} noise level adopted in the NAO is taken directly from the LOAEL defined in the WHO NNG and carried forward in WHO ENG18. Based on the WHO NNG, 10% of the population are highly sleep disturbed at 40 dB L_{night}. The Health Evidence Review also identified that a systematic review of subjective sleep disturbance carried out in 2022, covering 15 separate studies, found that 10% of the population were highly sleep disturbed at 40 dB L_{night}. The updated review highlights that in the UK the latest evidence continues to associate sleep disturbance with L_{Aeq}-based metrics with the N60 metric also considered. This UK evidence suggests that sleep disturbance occurs at lower levels than previously considered however these levels are comparable to the 40 dB Lnight guideline set out in the WHO ENG18. The updated review notes that the latest UK evidence is one the few studies to provide exposure response functions for aviation noise exposure at night specifically and is expected to further publish evidence comparing time-weighted versus event-based metrics, namely awakenings, on subjective and objective sleep disturbance.
This Health Evidence Review considers the current health-based evidence associated with measuring aircraft noise using alternative event-based metrics including other L_{ASmax}-derived metrics, i.e. awakenings. Some consultation responses suggested that these metrics should be used instead of the L_{Aeq}-based metrics in the NAO and as part of the aircraft noise assessment presented in the DRD Report. The updated Health Evidence Review maintains the position that the use of additional aircraft noise induced awakenings information forms an "important additional tool for estimating and managing the effects of aviation night-noise". These metrics can be used by practitioners to estimate and manage the effects of aviation night-noise and to explore interventions however ANCA's view is that these metrics are a secondary consideration LAeq-based metrics such as the Lnight metric which benefits from a weight of evidence through systematic review and is adopted as part of the regulatory framework under ENR.

On this basis, ANCA considers that there is no material reason to adopt an alternative threshold of 40 dB L_{night} as the point above which the population highly sleep disturbed

should be calculated and nor is there any rationale for adopting alternative exposure response function for HSD from the one defined by the WHO ENG18.

In relation to 45 dB L_{den}, the Health Evidence Review notes that WHO ENG18 does not describe 45 dB L_{den} as a LOAEL in the same way that 40 dB L_{night} is described as a LOAEL in the WHO NNG. The Review also notes that WHO ENG18 indicates that 10% of the population can be considered highly annoyed at 45 dB L_{den}. However, individual studies underpinning WHO ENG18 indicate a range in the population highly annoyed of approximately 2% to 28% due to a variety of factors. The Health Evidence Review concludes that "this uncertainty, and the fact that effects clearly vary between contexts, is why the WHO recommend the use of local data to estimate effects". The updated Health Evidence Review points to recent evidence from the UK with respect to annoyance which identifies similar exposure response functions to those reported in the WHO ENG18.

The recent EEA report Environmental Noise in Europe 2025 notes that emerging research indicates that negative health effects can begin at lower levels than the thresholds for reporting exposure under the Environmental Noise Directive and even the WHO recommendations, with many studies suggesting effect thresholds may be as low as 45 dB L_{den}. ANCA therefore considers that, based on statements by the European Environment Agency, it is appropriate to calculate the population highly annoyed using data below 55 dB L_{den} which is further supported by the findings of the recent UK study. While including the population exposed to levels above 45 dB L_{den} may be considered a conservative approach, ANCA considers that there is currently no compelling reason to adopt an alternative metric or value without the benefit of a local study.

The updated evidence therefore does not change ANCA's decision to continue to adopt the exposure response functions set out in the WHO ENG 18 as adopted through ENR via Directive 2020/367 or the thresholds above which the number of people highly annoyed and highly sleep disturbed are measured from as part of the NAO. This is further supported by the updated Health Evidence Review concluding that *"the evidence published since the WHO ENG 2018 suggest that thresholds for effects across a range of health outcomes including annoyance, sleep, and cardiometabolic diseases are comparable to the WHO guidelines"*.

ANCA's view remains that the evidence is not yet sufficient to move away from L_{Aeq}-based metrics, namely the L_{den} and L_{night}, for policymaking as part of the NAO and decision-making purposes and in preparing aircraft noise assessments under the Balanced Approach. These metrics are considered appropriate and evidence-led for describing the adverse effects of aircraft noise. These metrics also remain core reporting requirements under both the ENR and the Aircraft Noise Regulation.

ANCA considers that retaining the use of the L_{den} and L_{night} metrics and the calculation of the population HA and HSD remains appropriate for the setting of measurable criteria and expected outcomes as part of the NAO. ANCA continues to adopt the WHO (ENG 2018) recommended guideline values and associated ERFs for aircraft noise within the amended NAO when defining measurable criteria for its policy objective. This is consistent with the wider objectives of the legislation.

Other noise metrics amendments proposed in the NAO

Since the NAO was set in 2022 there have been no substantive changes to the legal and regulatory framework that underpins either the ENR or END. The L_{den} and L_{night} metrics remain the primary metrics for aircraft noise assessment in the EU and Ireland. The Act of 2019 requires the noise situation at the airport to be assessed in line with the ENR. This assessment is based on Lden and Lnight indicators, an assessment of the area, number of dwellings and number of people exposed to noise, and an assessment of the harmful effects of noise exposure through the number of people highly annoyed (HA) based on Lden exposure and highly sleep disturbed based on Lnight exposure. The objective of the END and ENR is to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise. The NAO policy objective is to limit and reduce the long-term adverse effects of aircraft noise on health and quality of life, particularly at night, through measures that mitigate impacts and provide certainty to the communities and the airport operator as part of the sustainable development of Dublin Airport. In the NAO policy objective and the assessment required under the legislation use of HA and HSD remain appropriate metrics to noise management at the airport.

The NAO expected outcomes include a reduction in the number of people HA and HSD by by 20%, 25% and 30% by 2031, 2036 and 2041 respectively, compared to 2023. These expected outcomes will be assessed under ENR in the context of the airport operations and population distribution at the time. Reporting under ENR provides the opportunity for optional reporting of dwellings and people living in dwellings that have special insulation against noise, and where reported, ANCA will use this information to identify the ratio of properties benefiting from noise insulation.

Land use management is a pillar of the ICAO Balanced Approach and indeed is helping to mitigate noise impacts at Dublin Airport through the provisions of noise zones under the FDP. Appendix A demonstrates that where residential development is granted in Zone B, planning conditions make it a requirement for appropriate noise mitigation measures to be applied to each dwelling unit.

The amended outcomes include an expectation that land use management and other measures will be used to mitigate and/or limit the number of dwellings, schools and

hospitals exposed, and also that the size of the 55 dB Lden and 50 dB Lnight contours will reduce compared to 2023.

By tracking the expected outcomes for HA, HSD, number of dwellings, schools and hospitals exposed, and the size of the aircraft noise contours, ANCA will be able to form a view on how the noise exposure at the airport evolves, and the relative changes in aircraft noise levels and development of the exposed population.

Recommendation on issues raised in Theme 3

ANCA summary response: Consideration of the submissions raised under this theme does not support change to the proposed amendments to the NAO.

Theme 4: NAO process, compliance and supporting evidence

Issues raised in relation to Theme 4

Proposed amendments, achievement of the NAO and benefits

Some submissions stated that the proposed amendments to the NAO can be achieved without new measures, referring to analysis by ANCA to support this position.

Respondents also suggested that the NAO should be related to the lived experience of residents rather than statistical modelling at a population level. Other submissions expressed a view that the NAO does not address the identified noise problem.

Submissions requested an explanation of how the proposed amendments will reduce aircraft noise and improve health outcomes, including quantifiable and enforceable measures, was requested. Submissions questioned what additional benefit the proposed amendments to the NAO will deliver to affected communities. Clarity was also sought on how the reduction targets for HA and HSD would be achieved.

Airport growth and operating restrictions

Objections were expressed to the proposed amendments on the basis that these would allow the airport to grow to 40 MPPA. It was stated in submissions that the proposed amendments will not restrict growth at Dublin Airport and there will be no reduction in flights as a result. Observations were made that the NAO cannot be considered separately from the planned growth of the airport.

Concerns were expressed that the proposed NAO might lead to future operating restrictions despite no increase in actual aircraft noise emissions.

Observations proposed that the NAO is placing the process in reverse by considering the economics in the objective.

Reliability of supporting data and availability of information

Some submissions expressed a view that ANCA did not have sufficient information (whether in relation to the response to information requested from daa by ANCA, modelling of alternative flightpaths/route options/runway alternation or consideration of additional matters) to make amendments to the NAO.

Planning-led residential growth and future compliance

Submissions supported the proposed amendments to the NAO, stating that the outcomes can be achieved, but also noted that future non-compliance could arise due to planning-led residential growth.

Periodic review of the NAO methodology

Responses proposed that there should be a periodic review of the NAO methodology.

ANCA response to issues raised in Theme 4

Proposed amendments, achievement of the NAO and benefits

An NAO is a noise management policy through which the process of aircraft noise regulation sets strategic outcomes which are expected to be achieved and which guide and determine noise management decisions. In order for the entirety of the NAO to be achieved (not just the expected outcomes), new measures must be considered in line with the airport's development and growth.

ANCA identified that a noise problem would arise from the carrying out of the development as proposed through the Application. Through the provisions of the Act of 2019, the process first requires the NAO to be defined, restated or amended. Through this process, ANCA carried out a review of the 2022 NAO and identified a series of considerations as to whether the NAO should be restated or amended. These considerations are presented in the NAO Review Report.

ANCA proposed amendments to the NAO for Dublin Airport, that maintain the principle of a policy objective that seeks *"to limit and reduce the long-term adverse effects of aircraft noise on health and quality of life, particularly at night, through measures that mitigate impacts and provide certainty to the communities and the airport operator as part of the sustainable development of Dublin Airport"*. In amending the NAO, ANCA places further emphasis on the policies and expected outcomes set by the NAO, therefore requiring noise-related actions to be taken by a range of stakeholders and not just the airport. This reflects the roles and responsibilities for the measures that are identified under the ICAO Balanced Approach and can be recommended by ANCA when making a regulatory decision.

More information detailing the reasons for the review and proposed amendments to the NAO dated 20 June 2022 is available in the NAO Report 2026 and detailed in Themes 1 to 5 above.

The expanded combination of noise reduction objectives is assessed as facilitating increased and targeted reductions in aircraft noise exposure compared with those established by the 2022 NAO. Additionally, these noise reduction objectives align more closely with the current and forecasted noise climate of the airport operating in a three-runway format. Forecast data provided by the airport indicate that these improved targets can be achieved through changes in fleet mix and operations at the airport.

The proposed amendments also include expected outcomes to reduce the number of people HA and HSD by 20%, 25% and 30% by 2031, 2036 and 2041 respectively, compared to 2023. This represents a tightening of the expected outcomes compared to the 2022 NAO, as illustrated in Figure 1 of the NAO report.

Following the review of the 2022 NAO and consideration of amendments, ANCA proceeded to identify mitigation measures through the application of the Balanced Approach, resulting in a draft regulatory decision.

Airport growth and operating restrictions

An NAO is a noise management policy through which the process of aircraft noise regulation establishes strategic outcomes which are expected to be achieved and which guide and determine noise management decisions in the context of sustainable development at the airport. The expected outcomes of the amended NAO represent a reduction in the number of people highly annoyed and highly sleep disturbed compared to the 2022 NAO, as illustrated in Figure 1 of the NAO Report. Forecast data provided by the airport indicate that these improved targets can be achieved through changes in fleet mix and operations at the airport.

The NAO sets out a policy for noise management and contains expected outcomes. The Balanced Approach process as set out in Aircraft Noise Regulation and the Act of 2019 determines the most cost-effective means to address the noise problem associated with the Application as proposed. Any new noise measures are then set out in a regulatory decision which contains conditions to be included within any decision to approve the Application to be made by the planning authority. It is the role of ANCA to assess the forecasted effect of aircraft noise associated with the Application as proposed, it is the role of the planning authority to determine if the Application is to be granted.

The amended NAO sets expected outcomes including reductions in HA & HSD, and reduction in the noise contour areas. Under the process set out in the ENR the NAP will

review the noise situation at the airport against the NAO on a 5-year cycle, and any evidence that the NAO is not being met may be used to identify a noise problem in the NAP, and the commencement of the process through Section 9 of the Act of 2019. This may occur, for example, if reductions of noise at source are not achieved as forecast. The process would identify any new measures required, potentially including new or amended operating restrictions.

The explanation of the objective within the amended NAO states *"This means limiting changes in the noise situation only to those which are outweighed by the wider economic and consumer benefits of aviation, and prioritising measures which can reduce adverse effects"*. It has been suggested that places the process in reverse by considering the economics in the objective. This is not the case, the NAO seeks to first achieve reductions in adverse health-related outcomes in the context of the noise situation before considering whether changes to the noise situation are necessary, particularly where development necessitates changes in locations that experience aircraft noise.

Reliability of supporting data and availability of information

The review considered objective evidence provided by the airport authority as part of the Application, along with data available to ANCA through wider processes. Where appropriate, ANCA also commissioned external evidence and reviews to support its decision-making. Although ANCA is required to consider amendments or the restating of the NAO under processes following the identification of a noise problem associated with the Application as proposed by the Applicant, the NAO is a policy that is independent of the Application itself. Therefore, ANCA is not limited to the information received as part of the Application when considering changes to the NAO and can consider other appropriate information and data that is available. In this context, the review and proposed amendments to the NAO have not been specific to the Application but have instead considered a broader evidence base supporting a SMART framework for objective setting.

Alongside the amended NAO, ANCA has prepared an accompanying guidance note which sets out how the NAO shall be implemented and monitored. The guidance addresses relevant technical considerations in support of the NAO with respect to its application and interpretation. It covers specific technical aspects of the standard and sophistication of aircraft noise modelling, and information to be reported in support of evaluations against the NAO under ENR and annual reporting. ANCA is satisfied from its independent review of the forecasts that these are sufficient for policy making.

Planning-led residential growth and future compliance

The expanded combination of noise reduction objectives is assessed as facilitating increased and targeted reductions in aircraft noise exposure compared with those established by the 2022 NAO. Additionally, these noise reduction objectives align more closely with the current and forecasted noise climate of the airport operating in a three-runway format.

The proposed amendments also include expected outcomes to reduce the number of people HA and HSD by 20%, 25% and 30% by 2031, 2036 and 2041 respectively, compared to 2023. This represents a tightening of the expected outcomes compared to the 2022 NAO, as illustrated in Figure 1 of the NAO report. The objectives support and guide the sustainable development of both Dublin Airport and the surrounding communities.

Periodic review of the NAO methodology

The guidance note also describes how and when ANCA will formally evaluate achievement of the NAO, which is aligned with the monitoring and reporting cycle under the ENR. This allows progress towards the achievement of the NAO to be monitored and reported under Section 21 of the 2019 Act, alongside wider decision-making regarding the achievement of the NAO to be determined in line with the ENR. As the Act of 2019 requires that the NAO is defined, restated or amended (as appropriate) following the identification of a noise problem at the airport, a periodic review of the NAO is not considered necessary as this would introduce additional uncertainty in the management of noise at the airport, for the local communities and for the airport, planning authority and air navigation providers.

Recommendation on issues raised in Theme 4

ANCA summary response: Consideration of the submissions raised under this theme does not support change to the proposed amendments to the NAO.

Theme 5: Effectiveness of the amendments to the proposed NAO

Issues raised in relation to Theme 5

NAO addressing the noise problem

Submissions express concern that the amended NAO will not address the noise problem.

Amendments to community noise protections

It was also suggested that the amendments will weaken rather than strengthen community noise protections.

The amended NAO and revised targets

Concerns were raised that the amendment of the existing NAO and revised targets represents a reduction in protections for residents.

Health impacts and the proposed NAO amendments

Submissions raised concerns that health impacts at night will continue despite the proposed amendments.

ANCA response to issues raised in Theme 5

NAO addressing the noise problem

An NAO is a noise management policy through which the process of aircraft noise regulation sets strategic outcomes which are expected to be achieved and that guide and determine noise management decisions. The evolution of the noise situation at the airport is assessed under ENR, and the NAP may compare the noise situation with the objectives within the NAO. Additionally, the forecast evolution of the noise situation at the airport is compared with the NAO in the context of proposed development or a proposed amendment to an existing OR brought forward by the airport operator. Where a noise problem is identified at the airport, ANCA must follow the process set out in the Regulation and Act of 2019 to identify and evaluate measures, determine the most cost-effective measures to address the identified noise problem, and make a regulatory decision. The NAO is a noise management policy. The measures set out within the RD address the identified noise problem.

The NAO sets the basis for noise management decisions that can be made through a regulatory decision. The Aircraft Noise Regulation prescribes that aircraft noise must be managed in the context of a sustainable transport network. As aircraft noise is an inevitable consequence of airport activity, the NAO is required to be defined so that noise management decisions are made in this context.

Amendments to community noise protections

A key principle of the NAO is that the harmful effects from aircraft noise shall reduce. This outcome shall apply irrespective of whether the airport is seeking to grow or permitted to develop. The wider suite of expected outcomes set through the amended NAO highlight the need to manage exposure to and development of noise-sensitive buildings exposed to the highest levels of noise, as well as tracking and monitoring how the amount of aircraft noise produced by the airport is changing over time.

The expanded combination of noise reduction objectives facilitates greater and more targeted reductions in aircraft noise exposure compared with those established by the 2022 NAO. Additionally, these noise reduction objectives align more closely with the current and forecasted noise climate of the airport operating in a three-runway format.

The amended NAO and revised targets

The proposed amendments include expected outcomes to reduce the number of people HA and HSD by 20%, 25% and 30% by 2031, 2036 and 2041 respectively, compared to 2023. This represents a tightening of the expected outcomes compared to the 2022 NAO, as illustrated in Figure 1 of the NAO report. The NAO expected outcomes seek that the measurable criteria will be limited to or reduced compared to 2023. This amendment, along with the wider collective expected outcomes, will require noise management practices to be maintained and improved through contributions by a range of stakeholders. If the NAO expected outcomes are not met, it may be that, after application of the Balanced Approach, additional noise mitigation measures or possibly only an OR could achieve that mitigation or limitation.

Health impacts and the proposed NAO amendments

The NAO is a noise management policy which is used to assess the evolution of the noise situation under ENR or regarding proposed development or a proposed amendment of existing operating restrictions brought forward by the airport operator. By applying the NAO, it is then the role of the ICAO Balanced Approach to identify and determine effective noise management measures. In the context of a proposed development, the amended NAO sets an expectation that noise must be mitigated in line with the Airport's development and growth. In line with this policy statement from the NAO, ANCA considers whether additional measures are required as part of the RD with regard to the proposed development.

The proposed amendments include expected outcomes to reduce the number of people HA and HSD by 20%, 25% and 30% by 2031, 2036 and 2041 respectively, compared to 2023. This represents a tightening of the expected outcomes compared to the 2022 NAO, as illustrated in Figure 1 of the NAO report, and represents a reduction in long term health effects due to night-time noise compared to the baseline in 2023.

Recommendation on issues raised in Theme 5

ANCA summary response: Consideration of the submissions raised under this theme does not support change to the proposed amendments to the NAO.

Theme 6: Health impacts

Issues raised in relation to Theme 6

Health impacts and the economic growth of the airport

Submissions raised concerns that the health impacts are being outweighed by the economic growth of the airport. Submissions questioned the proposed amendments and whether they are sufficient to address the noise impacts from the airport expanding to 40 MPPA.

Airport expansion and the proposed amendments

Submissions questioned whether the proposed amendments to the NAO provide sufficient protection for human health and quality of life in the context of the proposed expansion of Dublin Airport. Concerns were expressed that the health impacts of increased aircraft noise could be outweighed by the economic and social benefits associated with airport growth. Respondents questioned whether development could result in increased aircraft-noise exposure while the amended NAO outcomes continued to be achieved, and whether this was consistent with the objective of reducing the long-term adverse effects of aircraft noise on health and quality of life. Submissions also requested that the health costs associated with increased aircraft-noise exposure be considered alongside the economic benefits of airport development.

Noise mitigation thresholds and known health impacts

Submissions expressed concern that the proposed noise mitigation thresholds did not sufficiently align with the known health impacts of aircraft noise. Respondents referred to evidence that adverse health effects, including high annoyance and sleep disturbance, may occur at noise exposure levels below those previously used to determine eligibility for mitigation measures. Concerns were raised regarding the significance of 65 dB L_{den} and 55 dB L_{night} outcomes and in particular, the proposed removal of the existing requirement to reduce the population exposed above 55 dB L_{night} and its replacement with a monitoring requirement.

Submissions questioned whether the use of population HA and HSD, calculated using long-term average L_{den} and L_{night} metrics, adequately captures the range of adverse health effects experienced by affected communities. Respondents raised concerns regarding sleep disturbance, awakening events, the number, maximum level and timing of individual aircraft-noise events, and cumulative exposure, particularly during the night-time period. Some submissions therefore called for the use of additional or complementary health and noise metrics alongside L_{den} and L_{night}.

Sleep disturbance, high annoyance, night-time impacts and quality of life

Submissions raised concerns regarding the effects of aircraft noise, particularly at night-time, on sleep, health, wellbeing and quality of life. Respondents referred to sleep disturbance and awakening events and questioned whether the population HA and HSD metrics, based on long-term average L_{den} and L_{night}, adequately capture the effects experienced by affected communities.

Concerns were raised that long-term average noise metrics do not fully reflect the number, maximum noise level, timing and frequency of individual aircraft-noise events. Submissions referred to the potential for individual aircraft events to cause awakenings and cumulative sleep disturbance and sought greater consideration of these effects in the management of aircraft noise.

Some respondents called for the use of additional or complementary metrics, including awakening or event-based metrics, alongside L_{den} and L_{night}, to provide a fuller assessment of night-time aircraft-noise impacts and their effects on health and quality of life.

Reducing long-term adverse effects on health and quality of life

Submissions emphasised that the NAO should deliver a measurable and sustained reduction in the long-term adverse effects of aircraft noise on health and quality of life, particularly those associated with night-time noise and sleep disturbance. Respondents questioned whether the proposed amendments would result in actual reductions in harmful aircraft-noise exposure and sought assurance that health protection would remain a priority notwithstanding future development or changes in the operation of Dublin Airport.

Concerns were also raised regarding the outcomes and baseline against which progress would be measured. Some respondents questioned whether reliance on reductions in the numbers of people HA and HSD would adequately demonstrate improvements in health and quality of life where the overall noise situation could change as a result of airport development. Submissions sought clear, measurable and progressive reductions in adverse health and quality-of-life effects over the longer term.

Proposed amendments and health protection

Submissions questioned whether the proposed amendments to the NAO would provide an increased level of protection for the health and quality of life of communities affected by aircraft noise. Concerns were expressed that changes to the outcomes and baseline used under the 2022 NAO could weaken existing protections rather than result in an improvement in health-related outcomes.

Respondents questioned whether the amended NAO would deliver meaningful reductions in the adverse effects of aircraft noise, particularly in the context of potential

future changes in airport operations and development. Submissions sought assurance that the proposed amendments would strengthen, rather than dilute, the health protections contained within the existing NAO and would result in improved outcomes for people affected by aircraft noise from Dublin Airport.

ANCA response to issues raised in Theme 6

Health impacts and the economic growth of the airport

The policy objective of the amended NAO is to limit and reduce the long-term adverse effects of aircraft noise on health and quality of life, particularly at night, through measures that mitigate impacts and provide certainty to the communities and the airport operator as part of the sustainable development of Dublin Airport.

Amendments to the NAO's policy and associated policy explanation have sought to clarify that when seeking to reduce such outcomes, it is important that attempts are made to do this based on where and how noise is currently experienced. This places greater emphasis on the NAO being based on the current noise situation. This is because significant changes to the noise situation can themselves give rise to noise problems. This is reflected in the Health Evidence Review, which describes the 'change effect'.

Therefore, the NAO has been amended to clarify that **"***this means limiting changes in the noise situation only to those which are outweighed by the wider economic and consumer benefits of aviation, and prioritising measures which can reduce adverse effects"*. As such, the NAO seeks to first achieve reductions in adverse health-related outcomes in the context of the noise situation before considering whether changes to the noise situation are necessary, particularly where development necessitates changes in locations that experience aircraft noise.

Airport expansion and the proposed amendments

The NAO sets out a policy for the management of aircraft noise at Dublin airport, including expected outcomes for reductions in the number of people HA and HSD, and the area exposed to the noise compared to the 2023 baseline. The health-related outcomes set by the NAO are agnostic to specific development proposals or what development may occur in the future at Dublin Airport. The NAO does however recognise that aircraft noise must be managed in the context of wider sustainable development principles, which is an objective of the ENR and the Aircraft Noise Regulation. Importantly, in this context, the NAO sets health-related outcomes that shall be reduced irrespective of whether development occurs or not. The amended NAO recognises that development may require changes to the noise situation, where for example development proposals could require the airport to operate differently that it does today.

The NAO has been updated so that changes to the noise situation, are limited and reduced as far as possible and that changes to the locations experiencing noise are limited in this context. The amended NAO however recognises that certain development proposals may necessitate such changes and where this occurs, wider economic and social benefits are a consideration as is the case in sustainable development principles. This should not be confused with the cost benefit and/or cost-effectiveness of noise management measures.

Noise mitigation thresholds and known health impacts

As part of amending the NAO, ANCA commissioned an independent Health Evidence Review to support its review of the NAO. This Health Evidence Review was commissioned not only to update ANCA's understanding of the latest state of evidence regarding adverse health outcomes from aircraft noise but also to identify relevant metrics that describe these outcomes and thresholds of noise exposure associated with these metrics where interventions may be considered.

ANCA's response to the selected metrics and thresholds is provided under Theme 4. However, based on this review, ANCA concluded that it was appropriate to retain the number of people HA and HSD as key noise-related health outcomes as part of the NAO. These metrics quantify impacts from aircraft noise during the day and the night and have origins in the wider regulatory framework.

ANCA considered the threshold above which the health effects, namely HA and HSD, are to be assessment and reductions set as expected outcomes. The NAO utilises the guideline values of 45 dB L_{den} and 40 dB L_{night} as set out in the WHO ENG18 for aircraft noise. ANCA considered (Considerations 2 of NAO Report) the appropriateness of retaining these thresholds and concluded that consideration of noise exposure above 45 dB L_{den} and 40 dB L_{night} remain appropriate thresholds for the calculation of harmful effects with each representing 10% of the population highly annoyed and highly sleep disturbed respectively

ANCA also considered (Considerations 3 of NAO Report) the relevance of the 65 dB L_{den} and 55 dB L_{night} metrics, and whether additional metrics should be included (Consideration 4 of the NAO Report). Under the FDP, the 55 dB L_{night} represents a level of aircraft noise exposure where noise insulation measures are considered necessary in new developments. Where exposure could exceed both 55 dB L_{night} and 63 dB LAeq,16hr (equivalent to approximately 65 dB L_{den}) policies under the FDP require that noise-sensitive development be resisted. The WHO ENG18 indicates that at levels at and above 65 dB L_{den}, around 50% of the population can be considered highly annoyed.

However, the Health Evidence Review highlights that the individual studies informing the ENG18 indicate a range from ~18% to ~82%. In the case of the 55 dB L_{night}, the ENG18 indicates that around 30% of the population may be highly sleep disturbed at this level, while the WHO NNG states the situation is considered increasingly dangerous for public health. In the UK, values of 63 dB $L_{Aeq,16hr}$ (c. 65 dB L_{den}) and 55 dB $L_{Aeq,8hr}$ (where $L_{Aeq,8hr}$ can be equivalent to L_{night} subject to airport operations) have been used to set noise policy thresholds marking a level of exposure which is considered significant with respect to effects on health and quality of life and should be avoided. In the context of wider aircraft noise and land use management policies that apply to Dublin Airport, the monitoring of dwellings, schools and hospitals exposed to levels of aircraft noise at and above 65 dB L_{den} and 55 dB L_{night} remain important in this regard and can be tracked through the ENR and Section 21 of the Act of 2019.

ANCA also considered (Consideration 4 of NAO Report) whether additional metrics should be included within the NAO. Under ENR there is a requirement to address priorities through a process of identifying important areas. Whilst the population HA and population HSD provide a measure of aircraft noise in the context of health, these metrics do not identify any area or group where noise management and mitigation measures should be prioritised. The areas of the 55 dB L_{den} and 50 dB L_{night} noise contours are considered to be an important metric in measuring the noise output of Dublin Airport and in identifying priorities with respect to noise management and mitigation measures. It is therefore considered to be an important metric in measuring the noise output of Dublin Airport and in identifying priorities with respect to noise management and mitigation measures.

Sleep disturbance, high annoyance, night-time impacts and quality of life

The amended NAO includes measurable criteria including the number of people considered HA and HSD. These outcomes provide the basis for quantifying the impacts of aircraft noise with respect to adverse health outcomes. A key principle of the amended NAO is that over time these outcomes shall reduce, with the number of people considered HA and HSD becoming lower. ANCA commissioned an independent health review report by Professor Charlotte Clarke that was included as part of the documentation with the public consultation. This report "*State of the Evidence for Aviation Noise Effects on Health and Wellbeing*" was to ensure there was robust scientific evidence to support decision-making in relation to the selection of metrics for the management of aircraft noise. This report considered *awakenings* metrics and concluded that awakening contours form an important additional tool for estimating and managing the effects of aviation night-noise, but evidence suggests that they do not

identify additional health effects beyond those identified by other means or metrics. For this reason, ANCA retains the L_{den} and L_{night} metrics as the primary metrics for quantifying the impact of aircraft noise as aligned with END but this does not prevent the use of additional metrics as appropriate to support the management of aircraft noise.

Reducing long-term adverse effects on health and quality of life

The policy objective of the amended NAO is to limit and reduce the long-term adverse effects of aircraft noise on health and quality of life, particularly at night, through measures that mitigate impacts and provide certainty to the communities and the airport operator as part of the sustainable development of Dublin Airport.

The amended NAO has updated such reductions so that they are referenced against the noise situation in 2023. Furthermore, the amended NAO has updated the expected outcomes to reduce the number of people HA and HSD by 20%, 25% and 30% by 2031, 2036 and 2041 respectively, compared to 2023.

Proposed amendments and health protection

This represents a tightening of the expected outcomes compared to the 2022 NAO, as illustrated in Figure 1 of the NAO Report, which was based on the noise situation in 2019. Therefore, ANCA's position is that the amended NAO should support improved health-related outcomes for all those affected by aircraft noise from Dublin Airport.

Recommendation on issues raised in Theme 6

ANCA summary response: Consideration of the submissions raised under this theme does not support change to the proposed amendments to the NAO.

Theme 7: Additional matters raised

Issues raised in relation to Theme 7

Finalisation of the amendments to the NAO

Some submissions requested early finalisation of the proposed amendments to the NAO.

The process of aircraft noise regulation and the noise action plan

Submissions expressed views that there should be separation of functions with respect to the noise action planning process, the process of aircraft noise regulation.

Effect of the amended NAO on existing flight paths

Some submissions suggested that the 2023 baseline year legitimises flight path changes that the respondents considered to be unauthorised. Submissions suggested that the NAO should not be reviewed until a review of flight paths is undertaken first.

ANCA response to issues raised in Theme 7

Finalisation of the amendments to the NAO

The proposed NAO was published alongside the Draft Regulatory Decision and subject to consultation for 14 weeks. ANCA has finalised the NAO as soon as practicable, having regard to the submissions and observations received.

The process of aircraft noise regulation and the noise action plan

ANCA identified that a noise problem would arise from the carrying out of the development as proposed through the Application. In line with the Act of 2019, this process first requires the NAO to be defined, restated or amended. ANCA proposed amendments to the NAO, with a policy objective to limit and reduce the long-term adverse effects of aircraft noise on health and quality of life, particularly at night, through measures that mitigate impacts and provide certainty to the communities and the airport operator as part of the sustainable development of Dublin Airport.

The Noise Action Plan is a key element of the ENR and is made or revised on a 5-year cycle based on the strategic noise maps. Under the ENR Fingal County Council are the designated competent authority for making the NAP for Dublin airport. The Act of 2019 and the Aircraft Noise Regulation require that the noise situation is assessed in accordance with the ENR. The assessment under ENR is undertaken through the strategic noise mapping to assess the exposure in the preceding calendar year, and the NAP which identifies problems and situations that need to be improved. The EC Study on Airport Noise Reduction assesses the coherency of implementation of the END and the Aircraft Noise Regulation across Europe and confirms that the END and the Aircraft Noise Regulation should form part of an integrated process. On this basis, it is appropriate that the NAP is seen to be a relevant part of the process under the Aircraft Noise Regulation and the Act of 2019 if a noise problem at the airport is to be identified outside of a planning application brough forward by the airport operator. Fingal County Council is the designated action planning authority for the preparation of noise action plans. A NAP will be prepared within a local authority by the functional area with appropriate expertise in environmental noise management. There is no conflict of independence where this function is carried out by ANCA.

Effect of the amended NAO on existing flight paths

ANCA proposed amendments to the NAO, with a policy objective to limit and reduce the long-term adverse effects of aircraft noise on health and quality of life, particularly at night, through measures that mitigate impacts and provide certainty to the communities and the airport operator as part of the sustainable development of Dublin Airport. The NAO is a policy objective which sets out expected outcomes for a reduction in long term health effects and the area exposed to noise compared to the 2023 baseline situation. The NAO objectives are independent of current or future flight paths and do not legitimise or require a prior review of current flight paths. The NAO sets out a policy for the management of noise at the airport it does not set out specific measures. Any new noise mitigation measures, and/or operating restrictions, are to be determined through the Balanced Approach process which must identify to the least restrictive and most cost-effective measures required to address an identified noise problem. An existing noise problem may be identified in the NAP through the ENR process, or it may be forecast to occur if associated with a development proposed at the airport.

Recommendation on issues raised in Theme 7

ANCA summary response: Consideration of the submissions raised under this theme does not support change to the proposed amendments to the NAO.

ANCA consideration on the proposed amendments to the NAO

Having carefully considered the issues and concerns raised by respondents and summarised within thematic sections above, ANCA is satisfied that the amendments to the NAO, as proposed, remains appropriate as proposed.

3.4 Environmental assessments

3.4.1 Screening for Appropriate Assessment (AA) of the NAO

Natura 2000 sites are important ecological sites across the European Union that are given special protective status to ensure the long-term survival of Europe's most valuable and threatened species and habitats. They are comprised of areas known as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs).

A Stage 2 Appropriate Assessment is an evaluation of the potential effects of a plan or project on Natura 2000 sites, including whether it could adversely affect the 'integrity' of those sites.

The AA Screening Report for the proposed amendments to the NAO were available for public inspection on the ANCA website. Although public consultation is not required for

the purposes of AA Screening, ANCA has considered submissions and observations in relation to same in advance of its final determination on whether or not full AA is required for the proposed amendments to the NAO.

Assessment of submissions on the AA screening report for proposed amendments to the NAO

This section presents the summary of participants' submissions and observations on the AA screening report for the proposed amendments to the NAO including ANCA's consideration and assessment response to each of the themes.

Issues raised in relation to the AA screening report of proposed amendments to the NAO

Scope of assessment, airport growth, operating times, flight numbers, flight paths, noise levels and emissions

Some submissions suggested that growth is included in the environmental assessment due to the use of the noise situation in 2023.

Submissions stated that operating times, flight numbers, flight paths, noise levels and emissions were not taken into consideration in the environmental assessment.

Biological & non-noise environmental pathways

Submissions referenced the biological pathway to impacts on the Natura 2000 sites, the impact of noise on bird song and referenced research from other European Airports.

Other observations stated that non-noise environmental pathways should be included such as: PFAS/PFOS, ground water contamination, bird strike, Natura 2000 catchments, greenhouse gas emissions.

Other responses stated that the AA screening recognises aircraft noise disturbance of birds as a plausible impact pathway and stated that the effects of aircraft noise on birds cannot be dismissed because the effects on humans indoors can be mitigated.

Other observations stated that aircraft noise, bird disturbance in Natura 2000 sites is a plausible pathway requiring assessment.

Noise impact on birds

Responses identified that noise is characterised as continuous for birds, while it is single event-based noise for impact on humans.

Submissions stated that there is a weakness in ANCA's treatment of aircraft events as effectively "continuous noise".

Submissions stated that ANCA itself has already accepted that aircraft noise can disturb birds because ANCA adopted a precautionary 15 km zone of influence for aircraft noise expressly because of the potential for high and moderate noise effects upon birds.

Missing data

Some submissions stated that there is uncertainty due to discrepancy in modelling & missing data.

Natura 2000 site Ireland's eye SPA

Observations also stated opinions that Ireland's Eye SPA was not assessed.

Red kites

Submissions stated that the impact on Red Kites has not been assessed

In-combination effects

Others suggested that the environmental assessments failed to assess in-combination effects.

Project splitting

Observations were made that legislation does not allow project splitting, and that the ecological consequences of the Infrastructure Application cannot be separated from the Regulatory Decision.

Stage 2 appropriate assessment

Submissions also stated views that a full Stage 2 appropriate assessment is required.

Submissions raised the issue that ANCA screened this decision out for AA when it is substance the same as the 2021 NAO, which was subject to full AA.

ANCA response to issues raised in relation to the AA Screening Report of the proposed amendments to the NAO

Scope of assessment, airport growth, operating times, flight numbers, flight paths, noise levels and emissions.

Submissions on these matters were not within the remit of the proposed amendments to the NAO, nor the AA screening that was undertaken in relation to the proposed amendments to the NAO.

The focus of the NAO is to set the level of ambition for a noise management regime and objectives to be met, aiming to limit and reduce long-term adverse effects of aircraft noise on health and quality of life, particularly at night. The NAO uses the metric of measuring the number of people highly sleep disturbed and highly annoyed, aiming to

reduce these numbers compared to 2023 conditions. The SEA Environmental Report concluded no likely significant effects for the proposed amendments to the NAO.

The NAO seeks to reduce the harmful effects of aircraft noise as measurable through the number of people highly annoyed and highly sleep disturbed. These outcomes have been tightened through proposed amendments to the NAO. Wider amendments to the NAO reflect changes to the noise situation that have occurred since the NAO was first published in 2022. As part of this review, it has been identified that the new dwellings and people in certain contours have been afforded protections through noise insulation required through conditions of planning consents.

The NAO is not concerned with the expansion of Dublin Airport in regard to the increase in passenger numbers from 32 MPPA to 40 MPPA, which is the subject of the Infrastructure Application (F23A/0781). The NAO is also not concerned with operating times, flight numbers, flight paths, noise levels or emissions. It is restricted to the control and management of noise generated by the airport. Specifically, what the NAO is concerned with is set out in section 3.2 and as a result, assessment of passenger growth is not necessary.

Other matters relating to the AA screening in relation to the proposed amendments to the NAO that were raised are discussed below under specific headings.

Biological & non-noise environmental pathways

The implementation of the proposed amendments to the NAO relate to ensuring that growth or other changes at Dublin Airport are managed in line with expected outcomes which have been set. The NAO does not specify how the expected outcomes should be achieved, that being the remit of others including airlines, Dublin Airport and other Authorities. Testing of these outcomes, based on the objective scientific information examined as part of the NAO development process, has shown decreasing overarching noise outcomes against the NAO's defined metrics. As a result, the proposed amendments to the NAO are not identified as having any direct or indirect impacts on Natura 2000 sites. It is acknowledged however, that specific measures to meet the NAO might require AA (including Stage 2) at a later stage.

The proposed amendments to the NAO differ from the DRD in that the NAO amendments establish a framework for identifying noise problems at Dublin Airport, the NAO does not present actions that have the potential to give rise to any likely significant effects.

The outcome of Stage 1: screening for the proposed amendments to the NAO is that the site is not connected to or relevant to the conservation objectives any Natura 2000 sites and there are no actions in the NAO to give rise to any potential likely significant effects on any Natura 2000 sites, either alone or in-combination – there is therefore no pathway for effects.

Noise impact on birds

The implementation of the proposed amendments to the NAO relate to ensuring that growth or other changes at Dublin Airport are managed in line with outcomes which have been set, and do not change the noise situation in terms of noise generation. The AA screening of the proposed amendments to the NAO relates to the amendments to the objective, and not the impact of noise generated at Dublin Airport on birds.

The NAO does not specify how the expected outcomes should be achieved, that being the remit of others including airlines, Dublin Airport and other Authorities. As a result, the NAO amendments are not identified as having any direct or indirect impacts on Natura 2000 sites. It is acknowledged however, that specific measures to meet the NAO might require AA (including Stage 2) at a later stage.

Missing data

Whilst some information was not received by ANCA, it was considered that alternative information could be relied on to support ANCA's decision making. This includes, for example, the preparation of an independent review of the airport's forecasts and analysis carried out by ANCA's technical consultants. Based on that analysis, ANCA is satisfied that the data relied upon for the purposes of the AA Screening Report was adequate and robust.

Natura 2000 site Ireland's eye SPA

Ireland's Eye SPA was considered within the AA Screening Report. As stated above, no pathways for impacts to the surrounding Natura 2000 sites were identified, meaning no further assessment was required, i.e. a Stage 2 Appropriate Assessment. The assessment concluded that there were no likely significant effects.

Red kites

Whilst Red Kite are an Annex 1 bird and protected under the Wildlife Act 1976, they are not qualifying species/feature of the ecological designated sites in the Zone of Influence.

In-combination effects

The Plan (i.e. the proposed amendments to the NAO) was considered in-combination with other plans and programmes, and no in-combination effects were identified.

Project splitting

Project splitting concerns the artificial separation of a project for the purposes of avoiding an Environmental Impact Assessment or Appropriate Assessment. It has no application to the separate assessment of a plan and a project.

Stage 2 Appropriate Assessment

The proposed amendments to the NAO are not directly connected with or necessary to the management of any Natura 2000 sites. Furthermore, no pathways for potential impacts were identified as a result of the implementation of the proposed amendments to the NAO, and no likely significant effects were identified within the AA Screening Report.

At the point of AA screening for the proposed amendments to the NAO, the NAO process was much more mature, and more was known about the nature and the extent of the proposed amendments, compared to what was known about the 2022 NAO at the time AA screening was carried out. For this reason, based on a greater understanding of the proposed amendments to the NAO, it was possible to accurately identify the characteristics of the proposed changes and therefore to assess, in accordance with Article 42(7) of the 2011 Regulations, whether Appropriate Assessment was required. The conclusion of the AA Screening report was that it can be excluded on the basis of objective scientific information that the proposed amendments to the NAO, individually or in combination with other plans or projects, will have a significant effect on a European site, and therefore no Stage 2 Appropriate Assessment was required.

3.4.2 Strategic environmental assessment (SEA)

Introduction to the SEA of the NAO

Strategic Environmental Assessment (SEA) is the process used to assess the potential environmental effects of a plan or programme in certain sector where they set the framework for the grant of development consent in those sectors. It helps ensure that these considerations are fully taken into account during the preparation of plans and programmes, before they are formally adopted.

To be most effective, an SEA should be integrated into the preparation of plans or programmes at their earliest stages thereby allowing the SEA process to influence the final output. ANCA is carrying out SEA for the proposed amendments to the NAO. The SEA Draft Environmental Report for the proposed amendments to the NAO was available for public inspection and comment during the public consultation.

Notice of the proposed amendments to the NAO and the associated SEA Draft Environmental Report was sent to the environmental authorities specified in the SEA Regulations. Submissions and observations made by the environmental authorities were taken into account before the finalisation of the proposed amendments to the NAO. Submissions and observations received during the fourteen-week public consultation related to SEA Draft Environmental Reports were taken into account.

Background to SEA draft environmental report Proposed amendments to the NAO

The NAO is a policy that establishes the level of ambition for the management of aircraft noise as part of the sustainable development of Dublin Airport. The NAO seeks to support both environmental improvement and a sustainable transport network. In the context of planning policy, the NAO is a plan or programme that is subject to strategic environmental assessment (SEA). The NAO, as a plan or programme, does not facilitate or prevent the development of the airport. It sets out policy objectives, measurable criteria, and expected outcomes to be achieved regardless of whether growth occurs through planning or other processes. Proposed developments at the airport that support or enable growth will be assessed at project level by the relevant authority, subject to project-specific environmental assessment. The consideration of development proposals, including the aspects of the infrastructure application that seek approval for intensification of use (as expressed in terminal passenger capacity) or physical infrastructure, is not within the scope of the proposed amendments to the NAO as a plan or programme.

ANCA carried out SEA of the proposed amendments to the NAO. The SEA Draft Environmental Report for the proposed amendments to the NAO was available for public inspection and comment during the process of public consultation between 28 May 2026 and 03 September 2026. Matters raised during this period in respect of the draft environmental report are addressed here and are cross referenced in the SEA Statement for the proposed amendments to the NAO.

Assessment of submissions on the proposed amendments to the NAO draft environmental report

This section presents the summary of participants' submissions and observations on the proposed amendments to the NAO draft SEA report including ANCA's consideration and assessment response to each of the issues.

Issues raised in relation to the proposed amendments to NAO draft environmental report

Scope of assessment, airport growth, operating times, flight numbers, flight paths, noise levels and emissions

Some submissions suggested that growth is included in the environmental assessment due to the use of the noise situation in 2023.Others suggested that the SEA scoped noise out of a noise plan and climatic factors out of a growth plan, required no monitoring, and rested on a no-significant-effect finding because it depends on the 2023 baseline.

Submissions included observations that the SEA scopes Noise and Vibration out of assessment, on the stated basis that the objective is unlikely to be affected and that there will be no alteration to the operating procedures.

Other submissions stated that the Draft SEA Environmental Report scopes biodiversity (flora and fauna) out entirely.

Some submissions stated that operating times, flight numbers, flight paths, noise levels and emissions were not taken into consideration in the environmental assessment.

Consideration of the proposed amendments to the NAO and DRD separately for Strategic Environmental Assessment

Submissions expressed the view that the NAO and DRD should be considered as one single framework and not as individual plans.

Health protection levels in NAO

Submissions also stated a view that the draft environmental report of the proposed amendments to the NAO states that the NAO proposes lower HSD & HA rates to which the submission references that the NAO Report's (Consideration 10) records that a higher HSD rate was considered and refused.

Submissions stated that the SEA fails to recognise that the NAO lowers the level of protection for human health.

Alternatives

Submissions and observations on the strategic environmental assessment of the proposed amendments to the NAO also expressed a view that the process did not assess reasonable alternatives.

Modelling and the night-time data

Submissions expressed opinions that the SEA fails to recognise the difficulties in the modelling and the missing night-time data.

Cumulative effects and inter-relationships

Several responses raised the matter that cumulative effects and inter-relationships to other plans and projects were not taken into account, particularly the Infrastructure Application.

EPA submission

As one of the prescribed Environmental Authorities under the SEA Regulations, the EPA made a submission on SEA Draft Environmental Reports.

ANCA response to issues raised related to NAO draft environmental report

Scope of assessment, airport growth, operating times, flight numbers, flight paths, noise levels and emissions.

The focus of the proposed amendments to the NAO is to set the level of ambition for a noise management regime and objectives to be met, aiming to limit and reduce long-term adverse effects of aircraft noise on health and quality of life, particularly at night. The proposed amendments to the NAO uses the metric of measuring the number of

people highly sleep disturbed and highly annoyed, aiming to reduce these numbers compared to 2023 conditions.

The SEA assessed the proposed amendments to the NAO against a 'future baseline', which describes how environmental conditions would develop in the absence of the amendments but with the existing 2022 NAO remaining in place. The future baseline assumes that daa will seek to grow Dublin Airport in line with existing national, regional and local planning policy, which provides for an increase to approximately 40 MPPA by 2030 and approximately 54 MPPA from 2050, and that the Infrastructure Application (F23A/0781), which supports growth to 40 MPPA, is consented and carried forward. The future baseline also accounts for the ongoing modernisation of the aircraft fleet, including improved engine technology, which is expected to occur irrespective of the proposed amendments to the NAO. Accordingly, the plan-level effects of airport growth form part of the baseline rather than being effects of the proposed amendments to the NAO, and the SEA considers only the difference that the amendments make relative to that baseline.

Accordingly, impacts that arise from growth, as opposed to noise management measures, were scoped out. ANCA is satisfied that this was the appropriate approach to assessing a framework for the grant of development consent that is restricted to noise, as it leaves other plan-making and consent-granting bodies free to respond appropriately to other environmental impacts.

Several effects were scoped out of the Environmental Report on the basis that the proposed amendments to the NAO would not result in any alteration to operating procedures at Dublin Airport. The proposed amendments to the NAO set the outcomes to be achieved without dictating how that is to be done. Based on the data available, the proposed amendments to the NAO will not result in material changes in the distribution or intensity of noise emissions from aircraft

The SEA process determined no likely significant effects for the proposed amendments to the NAO against that baseline. Under the SEA regulations if no likely significant effects are identified, no monitoring is required.

The proposed amendments to the NAO are not concerned with the expansion of Dublin Airport in regard to the increase in passenger numbers, which is the subject of the Infrastructure Application (F23A/0781). The proposed amendments to the NAO are also not concerned with operating times, flight numbers, flight paths, noise levels or emissions. It is a policy relating to the control and management of noise generated by the airport.

Other matters relating to the SEA in relation to the proposed amendment to the NAO that were raised are discussed below under specific headings.

Consideration of the proposed amendments to the NAO and DRD separately for Strategic Environmental Assessment

The proposed amendments to the NAO and DRD were considered separately, each subject to their own SEA process as they are considered as independent 'plans' under the SEA guidance and they are considered separate plans for the purposes of the SEA Directive and the Irish regulations.

Furthermore, the NAO is first defined, restated or amended to outline the objectives to be achieved. The DRD measures therefore then follow and comprises the implementation of the measures required to meet the NAO objectives. They have therefore been considered separately for the purposes of SEA because they both are able to influence environmental outcomes independently.

Health protection levels in NAO

This matter has been dealt with in response to the issues raised on the proposed amendments to the NAO.

Alternatives

As detailed within the SEA Draft Environmental Report different amendments to the existing NAO were explored, however, to meet the ambitions of the NAO and address the noise problem identified, only one option was considered appropriate. As such, the SEA could not consider any alternatives as none had been identified that would meet the ambitions of the NAO. Only viable NAO alternatives i.e. those that meet the NAO requirements, were assessed.

Modelling and night-time data

Whilst some information was not received by ANCA, as identified in the Infrata Report (Appendix B to the DRD Report), it was considered that alternative information could be relied on to support ANCA's decision making. This includes, for example, the preparation of an independent review of the airport's forecasts and analysis carried out by ANCA's technical consultants. Based on that analysis, ANCA is satisfied that the data relied upon for the purposes of the SEA Draft Environmental Report was adequate and robust.

Cumulative effects and inter-relationships

Figure 2-3 of the SEA Environmental Report shows the interrelationships between different plans, rather than suggesting the plans are part of one-tiered programme.

The objectives set under the NAO and assessed under the SEA do not interact with the measures proposed under an RD, other than the proposed amendments to the NAO influences the measures within an RD to meet the objectives. The SEA for the NAO and DRD, respectively, concluded no likely significant effects, therefore there is no potential

for cumulative effects or any requirement to assess the two plans cumulatively, since they are assessed separately.

The NAO and DRD were considered separately, each subject to their own SEA process as they are considered as independent 'plans' under the SEA guidance. Furthermore, the NAO is first set to outline the objectives to be achieved. The DRD measures therefore then follow and comprises the implementation of the measures required to meet the NAO objectives.

The Final SEA Environmental Report includes the Environmental Noise in Europe 2025 report and Zero Pollution Action Plan targets, making reference to these in the context of the relationship to other Plans and Environmental Protection Objectives.

EPA Submission

The EPA submission is responded to in detail in the Final SEA Environmental Report.

Recommendation on issues raised on the proposed amendments to the NAO SEA

Following completion of the public consultation exercise, ANCA concluded that there were no further changes to the proposed amendments to the NAO. However, there is additional clarification provided in the accompanying NAO Guidance Note.

Following review of these minor post-consultation clarifications, Logika Consultants confirm that the assessment findings and conclusions of the SEA remain unchanged.

Part 4: Draft Regulatory Decision (DRD)

4.1 Introduction

Through the process of aircraft noise regulation associated with an assessment of the aircraft noise impact of the Application, a draft regulatory decision was prepared which contained noise mitigation measures that ANCA proposed to direct the planning authority to include as a condition of the planning authority's decision (if any) to grant permission for the development (F23A/0781). The DRD proposed a sound insulation grant scheme (SIGS) for residential dwellings to mitigate the noise impact of the proposed development.

For the purposes of the relevant environmental assessment legislation, a regulatory decision (RD) is regarded as a plan. The plan, in this instance, is a home insulation scheme to mitigate the possible impacts of aircraft noise arising from the development as proposed.

All submissions and observations made on the DRD during the 14-week public consultation were individually reviewed and considered by ANCA. The matters raised in the submissions have been categorised and responded to for administrative and presentation purposes under 10 themes as listed in Table 4.1.

There were also submissions and observations made during the public consultation on the DRD which come within the remit of other authorities. In particular, the DRD and the RD do not facilitate growth of the airport: the DRD and subsequent RD provide the framework for the management of aircraft noise should the planning authority decide to grant permission for this development.

4.2 Regulatory decision overview

4.2.1 What is the regulatory decision

ANCA has reviewed and proposed amendments to the NAO for Dublin Airport to reduce noise from Dublin Airport over the long-term. The achievement of the NAO in the context of the development as proposed is considered by the Draft Regulatory Decision (DRD), which has examined existing mitigation measures in place or in the pipeline and proposes measures to be used to address the noise problem arising from the Application. Strategic Environmental Assessment and Appropriate Assessment screening was carried out on the DRD. The associated Draft Environmental Report for the purposes of Strategic Environmental Assessment for the DRD was provided for public consultation.

Through the process of aircraft noise regulation associated with an assessment of the aircraft noise impact of the Application, a regulatory decision will be prepared which contains noise mitigation measures that ANCA will direct the planning authority to include as a condition of the planning authority's decision (if any) to grant permission for the development (F23A/0781).

4.2.2 What measures are proposed

The Draft Regulatory Decision proposed the introduction of a Sound Insulation Grant Scheme (SIGS) for residential properties affected by aircraft noise arising from the proposed development at Dublin Airport. The scheme would provide financial assistance up to a value limited to €40,000 (Index linked) exclusive of administration costs for noise insulation measures to homes exposed to aircraft noise levels of 60 dB L_{den} or above, with subsequent ongoing review of eligibility. The measure is intended to mitigate the impact of aircraft noise on affected residents while ensuring that support is targeted to households experiencing the highest levels of exposure.

4.2.3 DRD assessment methodology

To assist in the analysis and presentation of submissions and observations received during the public consultation, the matters raised have been grouped into nine broad themes described in Table 4.1 reflecting the principal issues identified by stakeholders in relation to the Draft Regulatory Decision. The themes provide a means of summarising the key issues emerging from the consultation. This consultation report outlines how ANCA had regard to all submissions and observations and provides the main reasons for ANCA's decision in relation to the main issues arising from the public consultation.

Table 4.1 Draft Regulatory Decision consultation themes

Theme reference	Theme description
Theme 1	Impact of aircraft noise on human health
Theme 2	Proposed home sound insulation grant scheme (SIGS) and the Draft Regulatory Decision
Theme 3	Additional noise mitigating measures and operating restrictions
Theme 4	Noise measurement, metrics and modelling of aircraft noise
Theme 5	Operational management of aircraft activity at Dublin Airport
Theme 6	Aircraft noise - monitoring and access to information
Theme 7	Airspace design and operation
Theme 8	Planning related matters
Theme 9	Additional matters raised

4.3 Assessment of submissions on the Draft Regulatory Decision (DRD)

This section presents the summary of participants' submissions and observations categorised into the themes in relation to the Draft Regulatory Decision including ANCA's consideration and assessment response to each of the themes.

Theme 1: The impact of aircraft noise on human health

Issues raised in relation to Theme 1

Health effects of aircraft noise

Submissions and observations described the significant impact of aircraft noise from Dublin Airport on human health, particularly in relation to annoyance and sleep disturbance. Some submissions highlighted the effects of interrupted sleep patterns on cardiac health, mental health, stress, fatigue, reduced concentration and general wellbeing. Submissions also referred to the cumulative impact of continuous exposure to high noise levels.

Submissions also referenced and attached health studies highlighting the impact of environmental noise, including aircraft noise, on human health to support the position that no further airport development that contributes to increased aircraft noise should be permitted. Several respondents described a desire to move from their homes due to the intensity of aircraft noise, its impact on the structure of their homes and its effects on human health.

Observations also requested that ANCA consider the human health costs associated with the Application, including in the context of the economic gain. Further submissions stated that health, environmental and climate costs should be considered as part of the cost-effectiveness assessment.

Night-time noise, sleep disturbance and shoulder hours

Many submissions identified night-time aircraft noise as a significant concern and, on this basis, objected to any potential increase in aircraft activity during sensitive night-time periods. Concern was expressed regarding the potential effects of noise on sleep quality, sleep continuity and overall wellbeing. Several responses highlighted the importance of protecting communities during the night-time shoulder periods of 23:00-00:00 and 06:00-07:00, noting that these times are often associated with going to sleep, early morning waking, and preparation for work or school.

Submissions noted that disturbance during these periods can have disproportionate effects on health and quality of life, particularly where aircraft movements occur repeatedly or over extended periods. Respondents outlined concerns regarding interrupted sleep, difficulty returning to sleep following overflights, increased fatigue,

stress, reduced concentration and the cumulative impacts of long-term sleep disruption. Reference was made to vulnerable groups, including children, older persons, shift workers and individuals with existing health conditions.

Many responses also noted the importance of being able to open windows at night to regulate indoor temperature and maintain a comfortable sleeping environment, particularly during warmer weather. However, respondents stated that frequent or prolonged aircraft noise can make it difficult to keep windows open, creating a trade-off between reducing noise exposure and maintaining thermal comfort and adequate ventilation. Some submissions further highlighted concerns regarding the combined effects of aircraft noise and summer heat, particularly in bedrooms and residential areas located beneath flight paths. Generally, submissions emphasised the importance of minimising night-time noise exposure and protecting periods that are considered critical for rest, recovery and human health.

Children, schools and other noise-sensitive uses

Submissions identified specific concerns regarding the impact of aircraft noise on schools and educational settings, including its potential effects on children's concentration, communication, cognitive development, wellbeing and learning outcomes. Concerns were raised in relation to vulnerable children and those attending schools with special educational needs, where respondents considered that additional sensitivities to noise and distraction may increase the potential for adverse effects on learning, behaviour, and overall educational attainment. Concerns were also expressed regarding the potential for aircraft noise events to disrupt classroom activities, outdoor learning opportunities and recreational periods. Several submissions stated that children require specific consideration and protection within the aircraft noise regulatory framework and expressed the view that the DRD does not contain sufficient provisions to explicitly safeguard children's health, wellbeing and educational environment from the effects of aircraft noise. Respondents also highlighted concerns regarding the proximity of existing and future educational facilities to areas affected by aircraft operations.

Submissions also raised concerns regarding the effects of aircraft noise on other noise-sensitive developments and users, including hospitals, healthcare facilities, nursing homes, residential care settings, community facilities and sports clubs. Respondents further identified impacts experienced by family members with intellectual disabilities, autism spectrum conditions and other sensory sensitivities, stating that aircraft noise can contribute to stress, anxiety, disruption of daily activities and reduced quality of life for those particularly sensitive to environmental noise.

Effects on homes, tranquillity, recreation and amenity

A common issue raised in submissions related to the impact of aircraft noise on the enjoyment of homes, outdoor amenity spaces and the wider environment. Respondents expressed concern that existing aircraft noise levels already negatively affect daily life and that any increase in airport capacity could further diminish residential amenity. Homes were described not only as places of residence but also as spaces for rest, relaxation, family interaction and remote working, all of which may be disrupted by aircraft noise. Submissions outlined how aircraft overflights can interfere with everyday activities both indoors and outdoors, including conversations, relaxation, gardening, recreation and the use of private outdoor spaces such as gardens, patios and balconies. Many respondents reported having to pause conversations, raise their voices or temporarily interrupt activities when aircraft pass overhead.

Concerns were also raised regarding the ability to enjoy outdoor areas during periods of good weather. Several responses emphasised the cumulative effect of repeated aircraft movements throughout the day, noting that the frequency and regularity of overflights can contribute to feelings of intrusion, loss of tranquillity and a reduced quality of life. Concerns were expressed regarding impacts on community amenity, including local parks, walking routes, sports facilities and other outdoor recreational spaces used by residents. Some submissions highlighted the potential effects of aircraft noise on animals, livestock, pets, wildlife and biodiversity, noting concerns regarding disturbance, stress, behavioural changes and the disruption of natural habitats.

Concern was expressed regarding the impact of aircraft noise on rural communities in counties surrounding the airport. Respondents noted that lower background noise levels in rural areas can make aircraft overflights more noticeable and intrusive, even where measured noise levels may be relatively low. Submissions suggested that assessment approaches based primarily on population exposure may not fully capture the experience of residents in sparsely populated areas, where tranquillity, environmental quality and the enjoyment of the countryside are highly valued. Concerns were raised about the effect of aircraft noise on the peaceful character of rural communities, the enjoyment of homes and outdoor spaces, and the role of the countryside as a place of recreation and respite for both residents and visitors. Responses also highlighted the contribution of rural landscapes to tourism, recreation, agriculture and the wider economy, and expressed the view that these factors should be given appropriate consideration when assessing the impacts of aircraft operations and future airport development.

Effectiveness of noise mitigation and insulation

Concerns were expressed regarding the effectiveness of existing noise mitigation measures and that current arrangements do not sufficiently reduce indoor noise levels

to prevent adverse effects on health, wellbeing and sleep. Some respondents stated that, despite the implementation of mitigation measures in some properties, aircraft noise can remain noticeable within dwellings and may continue to cause disturbance, particularly during the evening and night-time periods when background noise levels are lower and sensitivity to noise is increased.

A recurring issue raised in submissions related to the practical limitations of insulation measures where residents rely on opening windows for ventilation and temperature control. Respondents noted that the benefits of insulation can be significantly reduced when windows are open, particularly during warmer weather, creating a perceived conflict between maintaining a comfortable indoor environment and reducing exposure to aircraft noise. Some submissions highlighted concerns that residents should not be expected to keep windows closed for extended periods to achieve acceptable noise conditions within their homes.

Submissions also sought greater transparency regarding the performance of noise mitigation measures and requested evidence demonstrating the effectiveness of insulation schemes in reducing indoor noise exposure. Respondents requested that the benefits of such schemes be supported by monitoring data, independent assessment, or post-installation evaluation to demonstrate that they achieve their intended outcomes in practice. Other submissions requested that the effectiveness of insulation schemes be demonstrated.

WHO noise guidelines and noise exposure thresholds

Submissions and observations referenced the World Health Organization (WHO) aircraft noise exposure guidelines of 40 dB L_{night} and 45 dB L_{den}. Participants objected to further increases in aircraft activity and requested measures to ensure that the noise climate reflects these recommendations. Submissions also highlighted the Health Service Executive's submission to the planning authority on planning application F23A/0781, which recommended the WHO health protection standard of 45 dB L_{den} and 40 dB L_{night}. It was also stated that focusing on the 55 dB L_{den} and 60 dB L_{den} contours ignores a large population exposed to noise levels between 40 dB and 54 dB L_{den}.

Assessment of annoyance through alternative noise metrics

Observations stated that health evidence and the associated costs of health impacts were not adequately considered within the assessment. It was suggested that the noise assessment should consider the ‘change effect’ noted in the Health Review and that this should be reflected in how annoyance is calculated. Other responses stated that annoyance should be assessed on the basis of single noise events rather than long-term average noise metrics. Some submissions highlighted the need for an independent health impact assessment to consider the potential health impacts associated with aircraft noise exposure.

ANCA response to issues raised in Theme 1

Health effects of aircraft noise

ANCA has published proposed amendments to the NAO for Dublin Airport, with a policy objective to limit and reduce the long-term adverse effects of aircraft noise on health and quality of life, particularly at night, through measures that mitigate impacts and provide certainty to communities and to the airport operator as part of the sustainable development of Dublin Airport.

ANCA also commissioned Professor Charlotte Clark to undertake a review of the current state of evidence on the effects of aviation noise on human health. This review has been used by ANCA in support of its functions and decision making, particularly in relation to annoyance, sleep disturbance and awakenings, cardiovascular health, mental health and children's learning associated with aircraft noise (including the cumulative impact of continuous exposure to aircraft noise).

ANCA's assessment and decision making, in alignment with the amended NAO, has focused on measures that can reduce existing and potential future impacts of aircraft noise in the context of sustainable development at the airport. ANCA has also had regard to uncertainty arising from wider ongoing processes and has therefore considered measures that can be introduced irrespective of the outcome of those processes.

Where noise-related operating restrictions are under consideration, the Aircraft Noise Regulation provides that ANCA may additionally take due account of any direct, indirect or catalytic employment and economic effects, as well as the health and safety of local residents living in the vicinity of the airport, and the environmental sustainability when assessing the cost-effectiveness. ANCA determined that a noise problem would arise due to the Application as proposed, it then reviewed and proposed amendments the NAO and then it followed the Balanced Approach to identify the proposed new noise insulation scheme in the Draft Regulatory Decision. As the Draft Regulatory Decision does not include a new or amended noise-related operating restriction, ANCA has not taken due account of these optional additional factors.

ANCA notes submissions indicating that aircraft noise has adversely affected residential amenity and quality of life to the extent that some residents have considered relocating. These concerns were considered as part of the overall assessment of aircraft noise impacts. It is noted that additional noise mitigation measures are available at Dublin Airport, including the Voluntary Dwelling Purchase Scheme for eligible properties within areas exposed to the highest levels of aircraft noise, as part of the broader approach to managing aircraft noise impacts on surrounding communities.

The cumulative effects of aircraft noise associated with the application are addressed in the environmental impact assessment report.

Night-time noise, sleep disturbance and shoulder hours

The amended NAO includes the number of people highly sleep disturbed (HSD) as a measurable criterion, taking account of noise exposure from 40 dB L_{night} in alignment with the WHO Environmental Noise Guidelines 2018 (ENG18). The amended NAO includes expected outcomes of reducing the number of people highly sleep disturbed, as well as highly annoyed, by 20%, 25% and 30% by 2031, 2036 and 2041 respectively, compared with 2023.

In the case of sleep disturbance, the Health Evidence Review indicates that, in addition to the L_{night} metric, there is a role for L_{Amax} based metrics, together with consideration of additional aircraft noise induced awakenings. These metrics can help describe the potential risk of being awoken from sleep due to aircraft noise events. However, the review also identifies uncertainties, assumptions and complexities associated with the Application and calculation of these metrics.

The use of additional aircraft noise induced awakenings information is therefore considered an important additional tool for estimating and managing the effects of aviation night-noise that could be used when exploring interventions but should not be considered a primary metric for policy making.

Accordingly, ANCA considers that the use of L_{den} and L_{night} metrics and the calculation of the population highly annoyed and highly sleep disturbed (including in respect of the "shoulder hours") remain appropriate for setting measurable criteria and expected outcomes under the NAO. The use of these metrics also ensures regulatory alignment between the Act of 2019 and the Environmental Noise Regulations. For night-time noise, L_{Amax} and metrics derived from it, such as aircraft noise induced awakenings, can be used as supplementary information to support the assessment of the effectiveness of measures and interventions, but not for measuring or defining outcomes under the NAO itself.

ANCA considered submissions regarding the impact of aircraft noise on the ability to open windows for ventilation and temperature control, particularly during warmer periods and at night. These concerns were considered within the assessment of night-time noise effects, including potential implications for sleep, residential amenity and quality of life. The DRD also contained provision for the development of a property-specific statement of need for eligible properties.

Children, schools and other noise-sensitive uses

The Health Evidence Review commissioned by ANCA considers the current evidence relating to a range of human health effects associated with aircraft noise, including annoyance, sleep disturbance and awakenings, cardiovascular health, mental health

and children's learning including impacts of aircraft noise on vulnerable groups/people with existing health conditions and noise-sensitive developments. ANCA has used this review in support of its functions and decision making. Having regard to the changes in aircraft noise resulting from the proposed development, no further interventions were considered appropriate at this time.

Effects on homes, tranquillity, recreation and amenity

ANCA recognises that annoyance from aircraft noise influences a wide range of considerations, including its impact on tranquillity, recreation and amenity. Therefore, by considering the number of people who can be considered highly annoyed, the assessment provides indirect consideration of all of these impacts. This assessment methodology best captures the primary objective of the applicable legislation i.e. the ENR and Aircraft Noise Regulation. The proposed development does not cause or facilitate changes to the locations and communities affected by aircraft noise.

Effectiveness of noise mitigation and insulation

In considering the effectiveness of noise insulation and the specific concerns raised in the public consultation, ANCA has had regard to a range of noise-performance improvements that may arise from the insulation measures as part of the cost-effectiveness assessment. This is supported by emerging evidence that indicates that noise insulation can be highly effective in reducing the effects of aircraft noise. The effectiveness of property insulation as a mitigation measure is further addressed under Theme 2.

WHO noise guidelines and noise exposure thresholds

ANCA has continued to adopt the WHO ENG18 recommended guideline values (i.e. 45 dB L_{den} and 40 dB $L_{night)}$ for aircraft noise within the amended NAO when defining measurable criteria for its policy objective. The amendments include the number of people highly sleep disturbed and highly annoyed as measurable criteria, taking account of noise exposure from 45 dB L_{den} and 40 dB L_{night}, in line with ENG18. The selection of the eligibility criteria threshold for home insulation measures in the DRD is addressed in Theme 2.

Assessment of annoyance through alternative noise metrics

The Health Evidence Review does not provide a strong rationale for using alternative metrics to L_{den} and L_{night} as primary metrics for policy making. The review notes that EU Directive 2020/367 provides an opportunity for local studies to be used to quantify the population highly annoyed and population highly sleep disturbed, provided that "they are based on high quality and statistically significant studies". However, there are currently no such local noise and health studies relating specifically to Ireland or Dublin Airport.

ANCA therefore considers that L_{den} and L_{night}, together with calculation of the population highly annoyed and highly sleep disturbed, remain appropriate for establishing the measurable criteria and expected outcomes under the NAO.

In carrying out its assessment, ANCA identified that aircraft noise and its impacts can continue to reduce over time even with the growth that is forecast to arise from the proposed development. As no new locations would be impacted by aircraft noise due to the proposed development, a change effect is not considered to arise from the proposed development. ANCA's assessment and decision making has therefore centred on measures that can reduce noise impacts in the context of sustainable development and has ruled out measures that could themselves generate a change effect by redistributing noise and could therefore create noise problems separately from the noise problem identified as part of the proposed development.

Recommendation on issues raised in Theme 1

Consideration of the submissions related to this theme did not change the outcome of the assessment of the Application prior to making a Regulatory Decision.

Theme 2: Proposed home sound insulation grant scheme (SIGS) and the Draft Regulatory Decision.

Issues raised in relation to Theme 2

General matters on the proposed home insulation scheme

Submissions and observations to the public consultation requested improved noise insulation measures, with a larger geographical area for eligibility around Dublin Airport to help address the current aircraft noise impact and noise from future airport development. Concerns were raised that home insulation schemes may not adequately address the impact of the proposed development or the current noise being experienced from airport operations. Submissions suggested administration improvements of the proposed scheme, particularly in relation to management companies and alignment with other schemes to improve efficiency and transparency.

Defining the eligibility contour for home insulation

Submissions supported the proposed home insulation grant scheme. There was support expressed for the proposed home insulation measures in principle in some submissions, but it was requested that a lower eligibility threshold be applied, with WHO guideline exposure levels and 55 dB L_{den} expressed as examples. Submissions requested a wider geographic area of insulation eligibility and a better insulation scheme than existing schemes. Support was also expressed for increasing home insulation eligibility on a wider geographical basis than that available through current schemes.

Submissions requested that noise mitigation measures consider vulnerable individuals or low-income groups who are affected by aircraft operations. Other submissions requested insulation measures for non-habitable rooms such as attics.

Some observations requested justification for the selection of the proposed 60 dB L_{den} insulation eligibility contour, stating that it lacks evidential support. Other submissions suggested that the 60 dB L_{den} level does not correspond with the identified noise problem and that 60 dB L_{den} should not be the only eligibility parameter. Responses expressed views that ANCA's own supporting report demonstrates that alternative eligibility criteria are available in other schemes.

Support was also expressed for the proposed 60 dB L_{den} criteria for insulation eligibility in other submissions.

Contour-based eligibility and alternative eligibility criteria

Some responses supported home insulation measures but identified inequality with reference to homes outside of eligibility contours but experiencing similar noise levels to those experienced by eligible properties. It was requested that health or local acoustic conditions be considered as eligibility criteria. Other submissions requested that eligibility be available for homes under flight paths. There were also observations stating that insulation eligibility should not be restricted to noise contours alone and should take the effects on health into consideration. Requests were made for entire communities to be designated as precautionary protection zones that provide eligibility for high-tier retrofitting grants. It was suggested that over 90% of people HA are located within contours below 60 dB L_{den} and are not eligible for mitigation measures, suggesting the metrics used do not adequately address these people. Submissions expressed a position that broad population indicators can hide growth in exposure at higher noise levels.

Some submissions requested that scheme eligibility be based on the frequency of overflights such as the number of events over a certain noise threshold (e.g. N80 / N75), metrics such as L_{AFmax} (night-time), internal targets of 45 dB L_{AFmax} and 30 dB $L_{Aeq.}$ Submissions requested independent noise assessments for residential properties where aircraft noise levels exceed 64 dB L_{AFmax} at bedroom facades recommending this threshold for achieving an indicative internal maximum noise level of 45 dB(A), taking account of typical facade attenuation of approximately 19 dB(A) with windows open or background ventilation operating.

Submissions expressed views on the inequality for homes located just outside an eligibility contour.

Mitigation of occasional aircraft noise

Submissions requested access to home insulation supports for homes impacted by occasional aircraft noise, with easterly departures from the north runway during periods of south runway maintenance cited as an example. Submissions questioned whether the impact on communities due to periodic maintenance of runways and the transfer of aircraft flight procedures to an alternative runway, had been assessed.

Forecasting, monitoring, testing and independent verification

Many respondents supported home insulation as a noise mitigation measure but requested that forecasts be used to determine eligibility for the SIGS to prevent prolonged exposure to noise without measures in place. Responses also requested monitoring of indoor noise levels to assess the effectiveness of home insulation, including independent validation and verification of the measure. It was proposed that the RD should define an enforceable internal bedroom performance, ensuring bedrooms achieve the required indoor noise level following the works, with post-installation testing required. Submissions questioned unenforceable elements in the DRD criteria such as "where feasible" and "where possible". Submissions stated that verification of the effectiveness of the insulation should not be controlled solely by daa and that ANCA should independently verify results.

Financial limits and noise reduction targets

Some submissions did not support an upper financial limit for proposed measures. It was also proposed that a target of 10 dB reduction be achieved through the insulation scheme. Alternatively, it was also proposed that a mandatory 5 dB reduction should be implemented.

Newer homes and eligibility cut-off dates

Submissions stated that newer homes should not be excluded from the noise insulation scheme based on the assumption that they already include insulation through conditions of planning consent. It was pointed out that aircraft noise is also intrusive within new properties.

Other submissions requested amendments to provide additional clarity with respect to the eligibility date of 09 December 2019.

Administration, review and alignment with existing schemes

Consideration was requested as to how the proposed SIGS will be administered, reviewed and managed in conjunction with existing insulation schemes. Alignment of the review of the proposed SIGS eligibility, with existing airport schemes, was also requested.

Several responses requested that the management companies of apartments and duplexes be consulted in a similar manner to house owners for the purpose of home sound insulation.

Timing and implementation of noise mitigation measures

Opinions were expressed that the proposed noise mitigation measures should be in place prior to the development being consented or becoming operational.

Objections to the Draft Regulatory Decision and airport development

Some submissions objected to the Draft Regulatory Decision and associated noise mitigation measures. There were submissions that objected to the Application and to any noise mitigation measures that would lead to an increase in aircraft flights. Some submissions expressed the opinion that draft decision is presented as a tightening of noise standards and expressed the view that it facilitates airport expansion.

Counter views expressed support for a regulatory decision that did not include operating restrictions. These included both residents and industry stakeholders.

Night-time noise, low-frequency noise and overheating

Responses also expressed opinions that the proposed insulation scheme does not address night-time noise. Submissions explained that reliance on home insulation as a primary mitigation measure is scientifically unworkable because retrofits do not offer protection against long-wavelength, low-frequency sound energy and reverberation generated when aircraft are climbing. Submissions questioned the adequacy of the insulation scheme in relation to issues of overheating inside homes, with mechanical ventilation or heat-pump cooling also being required.

ANCA response to issues raised in Theme 2

General matters on the proposed home insulation scheme

ANCA notes the broad range of submissions and observations received in relation to the proposed sound insulation measures, including support for home insulation in principle, requests for wider eligibility and enhanced standards, and those expressing a view that insulation alone does not adequately mitigate the effects of aircraft noise. Where a noise problem is identified at the airport, ANCA must follow the process set out in the Aircraft Noise Regulation and the Act of 2019 to identify and evaluate measures and determine the most cost-effective measures to address the identified noise problem and make a regulatory decision. ANCA's examination of the Application evidences a view that the proposed development potentially enables a modest increase in noise exposure due to higher overall activity. The proposed development is forecast to result in additional growth in overall aircraft activity, leading to increased noise exposure across key indicators, as expressed through objective and measurable health impact indicators, for

which, there is not appropriate mitigation by way of operational or passive measures within the Application. ANCA therefore identified and evaluated measures and determined the most cost-effective measure to address the potentially modest increase in noise exposure due to the Application as proposed to be a new expanded noise insulation scheme. This included the establishment of an evaluated eligibility threshold for the homes most affected by aircraft noise.

Defining the eligibility contour for home insulation

ANCA notes the submissions referring to supporting documentation and published examples where eligibility criteria may apply at lower noise thresholds. In establishing the proposed eligibility criteria, ANCA considered a range of comparable noise insulation schemes and benchmarked the proposed approach against relevant national and international practice. The objective was to ensure that scheme is targeted towards those properties experiencing the greatest levels of aircraft noise exposure and that the level of funding available is sufficient to deliver meaningful and effective noise mitigation outcomes. Acknowledging that home insulation will not eliminate all aircraft noise or provide assistance for all homes affected, the proposed thresholds and grant available are aimed at striking a balance between fairness, effectiveness and the efficient allocation of resources, while ensuring that those most affected by aircraft noise receive the most comprehensive level of assistance.

ANCA had regard to submissions proposing that eligibility for noise mitigation measures should extend beyond the proposed 60 dB L_{den} criterion in the draft decision. In assessing the appropriateness of the proposed measures, ANCA undertook a benchmarking review of noise insulation and compensation schemes at comparable European and UK airports, together with a cost-effectiveness analysis. Both studies were published as part of the consultation documentation. The benchmarking exercise was carried out to identify the recent trends in noise insulation schemes (NIS) and compensation programmes. The benchmarking focuses on the schemes that have been recently proposed and/or implemented at other European and UK airports since 2020 or were created prior to 2020 but updated or extended in the last 5 years. These schemes have been found to have been adopted as part of ongoing airport noise management or in response to the airport development or expansion proposals. Most schemes have noise eligibility criteria expressed through metrics either relating to a 24-hour period (e.g. L_{den}), or a combination of daytime metrics and night-time metrics (e.g. L_{day}, L_{eve} and L_{night}), starting from as low as 55 dB L_{den}. Financial contributions are found to range from 50% and 100% of the intervention costs, with most of the airports included in the benchmarking providing coverage for 100% of the costs of interventions, especially for properties exposed to higher levels of noise. The scheme generally offers window performance improvements, or replacement, along with other insulation works (e.g., insulation of the rolling shutter case). Structural interventions to improve the façade performance may also be part of

the schemes. Some schemes offer either complementary or exclusively ventilation programmes.

At Dublin Airport, the Residential Noise Insulation Scheme (RNIS) has been introduced as a requirement of Condition 7 of the North Runway Planning Permission. The RNIS eligibility boundary was originally based on the forecast 2022 63 dB $L_{Aeq,16hr}$ contour, with the RNIS to be in place prior to the coming into operation of the North Runway. In accordance with Conditions 7 and 10, the scheme is subject to biennial review. The first such review was completed in 2024, based on the noise situation in 2023, while the second review is due during 2026.

The Residential Sound Insulation Grant Scheme (RSIGS) is a scheme that has been proposed in the context of North Runway Relevant Action (NRRA). This scheme seeks to mitigate night-time noise impacts from the Airport's operations on residential dwellings. An Coimisiún Pleanála's Order ABP-314485-22 outcome was for the scheme to provide noise insulation to residential dwellings exposed to noise above 55 dB L_{night}, N80 L_{Amax} noise contour or at least 50 dB L_{night} in the first full year when the Relevant Action comes into operation, with a change of at least +9 dB when compared with the current permitted operation in the same equivalent year. The scheme has been designed to improve the sound insulation performance of bedrooms in eligible dwellings through the provision of specific insulation measures in the form of a grant in the sum of an index linked amount to be agreed with the planning authority and ANCA. A reduction in indoor noise levels of at least 5 dB is targeted through the scheme. The RSIGS is one of the measures subject to judicial review and the European Commission's Article 8 review. Further detail is provided in DRD report in section 3.2.1 in relation to the North Runway Relevant Action (NRRA) and section 9.4.3 Residential Noise Insulation Scheme (RNIS).

ANCA considers that any noise mitigation scheme proposed should be proportionate with the scale of the proposed development and the level of noise exposure experienced. There is evidence of this approach as part of the benchmarking exercise carried out and included with the public consultation. ANCA however considers that measures where feasible should aim to provide noise mitigation to all exposed communities. In this regard, the scheme has been developed to include a target improvement in noise insulation. A target is considered appropriate as other factors including the building envelope can influence insulation performance. As such, and in practice, the insulation performance of measures will vary from building to building. As such, the scheme acknowledges that its intended outcomes can only occur where it is possible or feasible to do so.

The scheme has been developed with processes that seek to ensure that the maximum insulation performance from any combination of measures available under the scheme can be determined within the financial assistance provided by the scheme. This will be established through a 'Statement of Need'. The scheme includes provision for acoustic

ventilation which will help reduce the amount of time windows need to be open to maintain and regulate temperatures.

The proposed sound insulation grant scheme for residential dwellings has an initial eligibility criterion based on a forecast of dwellings to be exposed to aircraft noise at or above 60 dB L_{den} within the first calendar year following a grant of permission for this development. In response to submissions made in respect to the administration of eligibility reviews, it is proposed that eligibility to the scheme shall then be reviewed every two years thereafter with residential dwellings situated in the 60 dB L_{den} contour for the preceding calendar year being eligible under the scheme. It is further proposed that these reviews will be aligned with the review of existing insulation schemes in place at the airport.

It is currently forecast that the proposed scheme will provide eligibility beyond the existing RNIS scheme and supplement the L_{night} based RSIGS scheme proposed by ACP in July 2025.

Contour-based eligibility and alternative eligibility criteria

Respondents proposed the use of alternative eligibility metrics, including overflight frequency measures such as N80 and N75, night-time maximum noise metrics (L_{AFmax}), internal noise targets, and property-specific assessments based on external maximum noise levels at residential facades. These submissions emphasised the importance of capturing the frequency and intensity of individual aircraft noise events and the relationship between external and internal noise exposure. In reviewing these submissions, consideration was given to the suitability of the proposed metrics and assessment approaches. While such metrics may provide additional information on particular aspects of aircraft noise exposure, the scheme's eligibility criteria are based on established assessment methods that are applied consistently across airport operations and allow for a transparent and practical determination of eligibility.

Additionally, there is limited evidence of schemes that incorporate event metrics as the basis of scheme eligibility. There are however schemes which focus on night-time noise impacts. There is an ongoing process with ACP which is related to night-time noise. ANCA has determined that extending eligibility to 60 dB L_{den} will allow those experiencing aircraft events at levels lower that covered by the current RNIS scheme. In relation to submissions stating that insulation eligibility should not solely be defined by a contour and should consider the effects on health, ANCA commissioned an independent health review report by Professor Charlotte Clark that was included as part of the documentation with the public consultation. This report "*State of the Evidence for Aviation Noise Effects on Health and Wellbeing*" was to ensure there was robust scientific evidence to support decision-making in relation to proposed noise mitigation

measures. The selection of the metrics for the establishment of eligibility for insulation measures in the DRD is detailed in Theme 3.

ANCA recognises that the insulation scheme only considers a subset of the total population considered highly annoyed or highly sleep disturbed. As per the benchmarking of other noise insulation schemes, no schemes have been implemented at other EU airports extending down to 45 dB L_{den} and 40 dB L_{night} metrics used by ANCA to mark the point at which population highly annoyed and highly sleep disturbed are measured from through the NAO. When determining the eligibility threshold for the noise insulation scheme, consideration has been given to evidence of interventions and as a consequence those exposed to the highest levels of aircraft noise, considered a as priority. At higher levels of noise exposure, adverse health outcomes are more likely to arise and as such ANCA considers it appropriate that receptor-based interventions such as insulation target higher levels of exposure with other measures such as incentivising quieter aircraft providing a universal reducing in such outcomes.

Mitigation of occasional aircraft noise

ANCA recognises that south runway closures due to maintenance scheduling can impact on communities during use of alternative runway. These events are generally temporary and infrequent in nature and do not typically represent the normal operating conditions on which the proposed noise mitigation measures and insulation eligibility criteria are based.

Forecasting, monitoring, testing and independent verification

The proposed SIGS includes both an Initial Eligibility Report based on forecast aircraft noise for the year following grant of permission and annual Eligibility Reports based on the actual noise situation in the preceding year. This approach is intended to facilitate the timely identification of eligible dwellings whilst also ensuring that eligibility is reviewed and updated on an ongoing basis having regard to actual airport operations and the resulting noise environment. Accordingly, ANCA considers that the proposed arrangements provide an appropriate mechanism for identifying and prioritising dwellings affected by aircraft noise.

ANCA notes the requests for monitoring and verification of internal noise levels and for the inclusion of a mandatory post installation performance test. Under the proposed scheme, each eligible dwelling will be subject to a detailed building survey to determine the package of insulation measures required. Each property will then receive a tailored Statement of Need identifying the measures necessary to achieve the Target Performance having regard to the characteristics of the dwelling and the relevant external noise exposure. The scheme therefore adopts a property specific assessment process rather than a standardised approach applied uniformly to all dwellings.

Financial limits and noise reduction targets

The purpose of the proposed SIGS scheme is to provide a package of property specific insulation measures designed to achieve the Target Performance, up to the maximum grant value of €40,000 (index-linked) specified in the scheme. The proposed approach recognises that dwellings vary significantly in terms of age, construction type, layout, existing insulation performance and external noise exposure. As a result, the level of improvement that can be achieved will differ between properties and is dependent on the combination of measures identified through the building survey, elemental analysis and Statement of Need process. ANCA considers that the proposed financial limit provides a reasonable and proportionate framework for the delivery of insulation measures across eligible dwellings while ensuring that resources are directed towards achieving the greatest practical benefit in each case.

The proposed insulation scheme is grant-based, reflecting the approach adopted in comparable schemes identified through the benchmarking review. The scheme has been designed to achieve a defined noise reduction target by providing financial assistance for insulation measures that deliver the greatest acoustic benefit across a number of habitable rooms within a dwelling. Accordingly, the scheme focuses on achieving effective noise mitigation outcomes rather than funding whole-dwelling insulation works.

When determining the target noise reduction performance for the noise insulation scheme, ANCA considered existing target reductions available under the Airport's existing schemes. The existing scheme, RNIS, targets a 5 dB improvement which has been applied to the proposed scheme. Improvements that are possible through noise insulation are somewhat determined by the measures already incorporated into the building and the wider building envelope. In some cases, large reductions through insulation measures may not be achievable without structural works. Having regard for this, a 5 dB improvement target as part of the scheme is considered appropriate.

Newer homes and eligibility cut-off dates

Whilst acknowledging the impact of aircraft noise on newer properties, it is proposed that the SIGS scheme shall not apply to properties where a planning permission was granted after 09 December 2019 (or future properties otherwise built including through planning exemption), this being the date of adoption of the policies relating to development within Aircraft Noise Zones first proposed by Variation No 1 to the Fingal Development Plan 2017 - 2023 and subsequently retained in the Fingal Development Plan 2023 – 2029. Under these policies, residential properties granted permission after 09 December 2019 will include conditions related to the inclusion of noise insulation measures during construction. The FDP 2023 – 2029 requires a higher standard of assessment and/or insulation than introduced under previous FDPs and their associated noise zones.

Section 21.4 of the DRD Report detailed the consideration associated with the selection of 09 December 2019 as the relevant date with respect to the insulation scheme eligibility. The purpose of this home insulation is to improve the residential amenity of older properties that are, or may be, exposed to aircraft noise above 60dB Lden and may not be constructed to a comparable acoustic standard as properties constructed to more recent standards of assessment and construction. For this reason, the RD will include additional clarity on the 9 December 2019 date for eligible dwellings.

It is proposed that the scheme shall not apply to properties where a planning permission was granted after 09 December 2019, this being the date of adoption of the policies relating to development within Aircraft Noise Zones first proposed by Variation No 1 to the Fingal Development Plan 2017 - 2023 and subsequently retained in the Fingal Development Plan 2023 – 2029. Under these policies, residential properties granted permission after 09 December 2019 will include conditions related to the inclusion of noise insulation measures during construction. The FDP 2023 – 2029 requires a higher standard of assessment and/or insulation than introduced under previous FDPs and their associated noise zones. Section 21.4 of the DRD Report detailed the consideration associated with the selection of 09 December 2019 as the relevant date with respect to the insulation scheme eligibility.

Administration, review and alignment with existing schemes

Having regard to submissions regarding the practical aspect of the delivery of sound insulation to multi-unit dwellings where there is a management company in place, it is considered appropriate that the most effective method for ensuring eligible dwellings of this type is delivered, is in conjunction with a management company and apartment owners to provide for a more efficient rollout of the sound insulation and ensure that there is a high level of uptake. For this reason, the RD will include a modification to Part 4 of Schedule A to address this.

Submissions further identified additional practical considerations relating to the detail of a home insulation scheme in relation to the application of measures as defined by the scheme. For this reason, the RD will include a modification to the Procedure set out in Part 4 of Schedule A to provide for the submission of a scheme implementation plan for approval by ANCA. Additional detail will also be included in the RD text to provide further clarity where appropriate.

It was also proposed through the consultation process that the administration of the scheme should be aligned more closely to the existing sound insulation schemes, which includes an eligibility review every two years, rather than an annual eligibility review. Having regard to the submissions, it is considered that home insulation can be more effectively and transparently delivered through the alignment of all schemes where

possible. For this reason, the RD will provide for a review of eligibility in August every two years after the initial eligibility is established.

For the reasons detailed in the DRD Report, including cost effectiveness, the insulation scheme provides for measures within habitable rooms only that are built in compliance with the provisions of the building regulations and the Planning and Development Act.

Timing and implementation of noise mitigation measures

The delivery of the proposed insulation scheme is defined in Schedule A of the Regulatory Decision report. The Scheme includes a defined implementation programme designed to progress eligible properties as efficiently as possible. An Initial Eligibility Report, including a programme and timelines for delivery, must be published within three months of the grant of permission, with eligible property owners notified within six months of eligibility being determined. Following acceptance by the homeowner, the Applicant will use reasonable endeavours to complete the approved insulation works within six months. The Scheme therefore provides for the early identification of eligible dwellings and the timely progression of insulation measures through a structured and transparent process. In addition to matters raised through the process of public consultation, the RD will be amended with clarification text as appropriate to ensure the efficient implementation of the proposed noise insulation scheme.

Objections to the Draft Regulatory Decision and airport development

The DRD did not propose to facilitate the expansion of Dublin Airport in regard to the increase in passenger numbers from 32 MPPA to 40 MPPA, which is the subject of the Infrastructure Application (F23A/0781). The DRD addresses the aircraft noise impact of the proposed development and a decision on the Application will be made by the planning authority. The function of the planning authority is addressed under Theme 8.

Night-time noise, low-frequency noise and overheating

Concerns regarding night-time noise, low-frequency noise and indoor comfort were considered during the review of the scheme. The proposed insulation measures are intended to help reduce indoor noise exposure and improve the internal acoustic environment of eligible dwellings. While no insulation measure can completely eliminate aircraft noise under all operating conditions, the scheme includes a range of measures designed to provide a meaningful reduction in indoor noise levels.

The assessment also considered wider issues raised in submissions regarding the effectiveness of insulation in relation to low-frequency sound, ventilation and thermal comfort. The scheme has been developed having regard to relevant technical standards, established acoustic mitigation practices and benchmarking of comparable airport insulation schemes. These proposed measures set out in Schedule A of the Regulatory Decision report represent an appropriate and proportionate means of reducing indoor

noise exposure within the scope of the scheme. Matters relating to building ventilation and overheating are addressed through the design and specification of individual measures where applicable.

Regarding the submissions related to overheating due to the acoustic insulation, the proposed insulation scheme contains provision for the preparation of a bespoke statement of need to identify the appropriate measures to meet the target performance. The scheme includes the provision of ventilators (passive or mechanical) should these be deemed to be appropriate. Mechanical ventilation shall comprise of a ventilator unit consisting of a controlled variable-speed inlet fan with sound attenuating duct and cover that is capable of supplying fresh air to the room directly from outside by means of the supply duct and cowl (or grille).

The L_{den} metric incorporates an evening weighting of 5 dB and a night-time weighting of 10dB as noise is generally considered to be more annoying during these periods. The use of this metric addresses the noise impact across the full 24-hour periods of a year rather than the day & evening periods only by existing insulation schemes.

Recommendation on issues raised in Theme 2

Having regard to submissions relating to the implementation of the insulation scheme, amendments will be made to the Draft Regulatory Decision to improve the clarity and the administration of the measures in the Regulatory Decision through the planning compliance process.

Theme 3: Additional noise mitigating measures and operating restrictions

Issues raised in relation to Theme 3

Submissions and observations were made to ANCA that requested the inclusion of noise mitigation measures or operating restrictions other than those measures proposed by the Draft regulatory decision. These suggestions are summarised hereafter.

Operating restrictions and/or operational measures

Submissions requested the implementation of a range of measures to address the impact of aircraft noise, with particular emphasis on night-time noise. These included operating restrictions such as enforceable limits or caps on night-time aircraft movements, night flights curfews, restrictions on airport operating hours, a noise quota scheme (NQS), passenger number limits, and restrictions or curfews on noisier aircraft. Respondents highlighted that night-time restrictions or curfews operate at other European airports and requested that similar measures be considered for Dublin Airport. There were also calls for legally binding aircraft noise limits, supported by penalties and/or corrective action in cases of non-compliance. Submissions requested stronger and binding requirements to prevent people being exposed to harmful levels of aircraft

noise. Some submissions requested stricter controls or a movement limit on the frequency of night-time aircraft movements on the north runway during south runway maintenance closures. Other submissions proposed that the terminal passenger limit at Dublin Airport should be categorised as a noise related operating restriction.

Some submissions also requested that ability to pay be considered in relation to availability of mitigation measures. Some submissions sought enhanced protection for vulnerable residents and greater recognition of people who may be particularly susceptible to the health and wellbeing effects of aircraft noise. Respondents requested that the assessment of mitigation measures take account of human-health impacts and associated costs, rather than relying solely on average noise exposure or population within established noise contours. Responses also requested that consideration be given to mitigation for hospitals and other noise-sensitive facilities.

Submissions also proposed operational measures such as minimising night-time aircraft operations or aircraft concentration over residential communities. Rotation or alternation of runway operations was proposed as a means of providing predictable periods of noise respite to communities, particularly in the context of any future increase in flights. Submissions also requested that the existing preferential runway operating procedure (commonly referred to as Mode7B) associated with the North Runway planning permission, be revisited, including consideration of reversing the current procedure. Submissions proposed relocation, compensation schemes or other noise mitigation measures for residents impacted by south runway closure.

Submissions requested greater use and monitoring of operational noise-reduction procedures, including Noise Abatement Departure Procedures (NADP), Continuous Descent Operations and Preferential Runway Use (PRU). Submissions also sought reconsideration of other operational and alternative noise-mitigation measures where existing measures were considered ineffective or insufficient.

Responses requested measures to reduce the concentration and frequency of aircraft operations in proximity to schools and proposed that schools be included within appropriate insulation and noise-mitigation schemes. Submissions requested mitigation measures for residents affected by north runway selection during night-time maintenance periods on the south runway.

Some submissions supported the application of the Balanced Approach in identifying appropriate noise-management and mitigation measures. However, concerns were expressed regarding the effectiveness of existing measures and whether the proposed mitigation package would be sufficient to address the impacts arising from the proposed development and wider airport operations.

Reduction of noise at source

Respondents requested that the reduction of noise at source be prioritised over mitigation measures such as residential insulation. Some submissions highlighted that insulation does not address the ability of residents to enjoy outdoor spaces. Greater use of quieter, new-generation aircraft through fleet modernisation was proposed. Some respondents considered fleet modernisation to be a necessary mitigation measure and proposed that the proposed development, including growth to 40 million passengers, should not proceed until the required fleet modernisation had occurred.

Voluntary Dwelling Purchase Scheme

Submissions expressed concerns regarding the effectiveness and continued appropriateness of the existing Voluntary Dwelling Purchase Scheme (VDPS). Some of these requested that the scheme be monitored, reviewed, refined and, where necessary, enhanced. Proposals included extending eligibility to additional properties, including properties in Zone A of the Development Plan, and changing the eligibility thresholds to 60 dB L_{den} and 50 dB L_{night}. It was also proposed that the scheme be assessed against present-day noise levels, property-market conditions, available alternatives and the proposed future growth of Dublin Airport. Where the required internal noise target cannot be achieved following mitigation measures, respondents requested that affected homeowners have the option of pursuing voluntary purchase. Submissions proposed appropriate compensation for households significantly or adversely affected by aircraft noise. Some of these proposals included property purchase, voluntary buy-out and relocation schemes for severely affected households, particularly where appropriate internal noise targets cannot be achieved through insulation or other mitigation measures.

Mechanical ventilation

Concerns were raised regarding ventilation arrangements in dwellings located within airport-sensitive areas, particularly Zones A and B, with suggestions that enhanced mechanical ventilation systems should be provided to support indoor environmental quality while maintaining the effectiveness of acoustic insulation measures. Respondents noted that highly insulated homes may require windows to be opened during warmer periods, potentially reducing the benefits of noise insulation. The use of enhanced ventilation and environmental control measures was therefore proposed as part of the mitigation package for eligible properties.

ANCA response to issues raised in Theme 3

Operating restrictions and/or operational measures

The Aircraft Noise Regulation establishes the legislative basis for the introduction of noise-related operating restrictions at European Union airports within the ICAO

Balanced Approach to aircraft noise management. The regulation requires competent authorities to consider all other measures available to manage noise problems (as defined by the of the Balanced Approach) prior to considering operating restrictions which may may only be introduced as a measure of last resort. It further requires that any measure or combination of measures adopted be proportionate, not more restrictive than necessary to achieve the relevant environmental noise abatement objectives and address the identified noise problem in the most cost-effective manner.

ANCA's examination of the Application evidences a position that the proposed development potentially enables a modest increase in noise exposure due to higher overall activity due to the proposed increase in passenger numbers. The proposed development enables additional growth in overall aircraft activity, leading to increased noise exposure across key indicators, as expressed through objective and measurable health impact indicators, for which, there is not appropriate or additional mitigation by way of operational or passive measures within the Application. On 22 January 2026, ANCA determined that a noise problem would arise through the implementation of the development as proposed and proceeded to review the 2022 NAO and then to adopt the Balanced Approach.

In applying the Balanced Approach to the identified noise problem, ANCA also considered noise mitigation measures other than those proposed in the Draft Regulatory Decision. The reasons for not progressing those measures are set out in Chapter 11 of the Draft Regulatory Decision Report. Operational noise abatement measures, including Noise Abatement Departure Procedures (NADP), Continuous Descent Operations and Preferential Runway Use, are already in place at Dublin Airport and are listed in the Aeronautical Information Publication, EIDW AD 2-1 and EIDW AD 2.21 Noise Abatement Procedures. As the proposed development does not change the locations or communities that are affected by aircraft noise, ANCA did not consider measures such as alternative runway use patterns, as such measures could result in a noise problem that is not associated with the proposed development by creating a change effect. The amended NAO seeks to reduce noise impacts and limiting changes to the noise situation to those needed to support the wider economic and consumer benefits of aviation. In this context and given the impact of the proposed development on the noise environment, measures that would change the distribution of noise impacts around Dublin Airport were considered disproportionate.

The current noise-management framework at Dublin Airport also includes operating restrictions. Some of these restrictions are under consideration for amendment or replacement through separate planning or other regulatory processes.

The Application was referred to ANCA for an aircraft noise assessment of proposed development at Dublin Airport through the provisions of Section 34B of the Act of 2000. ANCA determined that the application as proposed, without any additional noise

mitigation measures, would result in a noise problem due to a modest increase in noise exposure and commenced the process of aircraft noise assessment in accordance with the Balanced Approach. Through this process, and having regard to the existing noise management framework, ANCA determined the identified noise problem could be addressed in a proportionate and cost-effective manner through noise mitigation measures that did not include operating restrictions. that a new noise insulation scheme is the most cost-effective noise mitigation measure to address the noise problem associated with the proposed development. Through this process and assessment, ANCA determined that a new noise insulation scheme is the most cost-effective noise mitigation measure to address the noise problem associated with the proposed development. This assessment, and proposed noise mitigation measures, had regard to aircraft noise implications of any grant of permission to increase the passenger capacity of the airport from 32 MPPA to 40 MPPA through the process prescribed by the Aircraft Noise Regulation and Section 9 of the Act of 2019.

Under the process established by the Aircraft Noise Regulation, any individual measure or combination of measures adopted must not be more restrictive than necessary to achieve the environmental noise-abatement objectives established for the airport, and the identified noise problem is to be addressed in the most cost-effective manner. For the reasons set out in the Draft Regulatory Decision Report, ANCA determined that the noise problem arising from the proposed development could be appropriately addressed, in the most cost-effective manner, through noise mitigation measures that did not include an operating restriction. In this context, the Aircraft Noise Regulation gives effect to the principle of proportionality by providing that noise-related operating restrictions should be introduced only where other Balanced Approach measures are insufficient to achieve the relevant noise-abatement objectives. The relevant objective in this case is the NAO, as amended through the assessment and regulatory process for the reasons detailed in the accompanying report and in the NAO section of this consultation response document.

Submissions in relation to airspace design and operation are addressed under Theme 7.

Reduction of noise at source

ANCA confirmed that the proposed development would not result in changes to the locations experiencing aircraft noise. As such, and in line with the amended NAO, ANCA then identified and evaluated measures and determined the most cost-effective measure to address the potentially modest increase in noise exposure due to the Application as proposed to be a new expanded noise insulation scheme. The Draft Regulatory Decision Report set out a review of the noise mitigation measures considered in relation to addressing the noise problem identified, in addition to existing noise mitigation measures already in place at Dublin Airport. These measures reviewed included reduction of noise at source, noise abatement operating procedures such as

noise abatement departure procedures (NADP), displaced landing threshold (DLT), steeper approaches, land use planning, relocation assistance and a voluntary purchase scheme. Further details relating to fleet modernisation and technological improvements is provided in this report under Part 3 (NAO) under Theme 1 – Expected Outcomes and Measurable Criteria.

Voluntary Dwelling Purchase Scheme

Chapter 11 of the DRD Report highlights the consideration and reasons why ANCA did not progress consideration of other non-operational (passive) measures such as amendments to and/or a new dwelling purchase or school insulation scheme. Such schemes were considered as part of the benchmarking exercise however ANCA did not progress these because the benchmarking demonstrates that separate arrangements for residential properties and noise-sensitive buildings are consistent with the range of approaches adopted at comparator European and UK airports.

In respect of submissions requiring target measures for their home, the proposed insulation scheme contains provision for the preparation of a bespoke statement of need to identify the appropriate measures to meet the target performance.

The assessment also included consideration of other European noise mitigation schemes that had outcomes related to indoor and outdoor noise prior to developing the proposed scheme.

The DRD Report further details the reasoning and cost effectiveness examination for the selection of the entry eligibility criteria for the proposed residential insulation scheme. The metrics selected are aligned with the requirements of END and the recommendations of the Health Evidence Report commissioned by ANCA. Further information in relation to eligibility of proposed noise mitigation scheme is provided in this report under Part 4 DRD - Theme 2 Proposed home sound insulation grant scheme (SIGS).

Mechanical ventilation

The owner of an eligible dwelling, subject to the conditions set out for the proposed grant scheme, shall be entitled to a selection of insulation measures to habitable rooms as specified as under Schedule A of the DRD report. This includes consideration for mechanical ventilation following appropriate building survey and technical analysis.

Recommendation on issues raised in Theme 3

Having considered the submissions concerning reduction of noise at source, land use planning (including passive mitigation measures), operational procedures (including runway selection and aircraft operational procedures), and operating restrictions (including NQS, night-time curfews, passenger or aircraft limits), ANCA determined that

the submissions do not alter the outcome of its assessment of the Application through the application of the Balanced Approach.

Theme 4: Noise measurement, metrics and modelling of aircraft noise.

Issues raised in relation to Theme 4

Theme 4 addresses submissions relating to the measurement, assessment and monitoring of aircraft noise, including the methodologies and metrics used to evaluate noise impacts, the modelling of future aircraft operations, and the monitoring of noise exposure around Dublin Airport. Participants raised concerns regarding the accuracy and validation of aircraft noise modelling, the suitability of the noise metrics used to assess impacts, the assessment of different operational scenarios, and the adequacy of existing noise monitoring arrangements. ANCA reviewed these issues having regard to the requirements of the Aircraft Noise Regulation, the Environmental Noise Directive, applicable international modelling standards, and the evidence base relating to aircraft noise and health impacts.

Accuracy of aircraft noise modelling

Some submissions raised concerns regarding the robustness and accuracy of the aircraft noise modelling underpinning the assessment. Respondents questioned whether the noise forecasts rely on outdated data, understate the extent of noise impacts, or fail to adequately account for recent operational changes, including the increased use of the north runway during runway maintenance periods and growth in night-time operations. Concerns were also expressed regarding ANCA's reliance on modelling undertaken by daa, with some submissions calling for independent verification of the modelling and associated assumptions. In addition, respondents queried the accuracy of elements of the forecast methodology, including the modal split applied in future passenger and traffic forecasts.

Observations also questioned whether current noise mapping and modelling adequately capture the actual noise environment experienced by affected communities. Respondents expressed concern that modelled averages may not reflect residents lived experience of aircraft noise, resulting in an underrepresentation of impacts and the need for mitigation measures. A recurring issue raised was that the modelling does not sufficiently account for differences between average and actual noise exposure, nor the effects associated with prolonged periods of 100% easterly or 100% westerly operations. Further observations challenged specific forecasting assumptions, including the projected use of G2 aircraft relative to operator plans, forecast passenger numbers during the night period, and assumptions relating to aircraft load factors.

Furthermore, submissions noted that the forecast fleet mix assumes an increase in G0 aircraft types and suggested that this may overstate future noise impacts. In this context,

respondents requested that consideration be given to evidence on whether quieter aircraft are being incentivised and whether airport charging arrangements are contributing to the accelerated introduction of newer-generation aircraft during night-time and early-morning periods. Some submissions also called for independent validation of the forecast fleet mix assumptions.

Assessment of airport operations

Submissions requested that ANCA assess a range of alternative runway operating scenarios and flight path configurations to better understand the potential distribution and extent of aircraft noise impacts. Some submissions expressed a view that ANCA did not have sufficient information (whether in relation to the response to information requested from daa by ANCA, modelling of alternative flightpaths/route options/runway alternation or consideration of additional matters) to make a regulatory decision. Respondents also sought the establishment of a clearly defined noise envelope for the proposed development, providing greater certainty regarding the anticipated noise environment and the limits of future noise exposure. In addition, submissions emphasised the importance of considering the geographic distribution of aircraft noise, including how noise impacts may be experienced across different communities and under varying operational conditions. Several respondents highlighted the need for the assessment to examine not only the overall level of noise generated by Dublin Airport, but also how that noise is distributed spatially, to ensure that the impacts on affected areas are fully understood and appropriately considered.

Aircraft noise metrics and assessment methodology

Submissions and observations raised a range of concerns regarding the aircraft noise metrics used in the assessment and their suitability for evaluating noise impacts and informing mitigation measures. Respondents questioned the reliance on annual average noise metrics, particularly in relation to night-time operations, arguing that such metrics may not adequately capture the effects of repeated aircraft noise events or reflect the experience of those exposed to frequent overflights. Several submissions suggested that average annual noise levels should be supplemented by additional metrics, including maximum noise levels and event-based measures, to provide a more comprehensive understanding of noise impacts.

A recurring theme was the request for a wider range of noise metrics and contour information to be made available, including L_{AFmax}, N80, N75, N70 and SEL contours for the night-time period. Submissions also questioned the appropriateness of the metrics currently used to determine eligibility for noise insulation schemes, suggesting that metrics such as L_{Amax}, overflight frequency, and the number of aircraft noise events exceeding specified thresholds may provide a more meaningful assessment of community exposure to aircraft noise. Some respondents referenced health evidence

relating to sleep disturbance and requested that greater consideration be given to awakening effects and noise metrics that better capture such impacts. It was also requested that noise metrics be assessed for individual runway operating modes rather than solely on an annual average basis.

In addition, submissions called for the noise assessment to be undertaken with reference to the WHO-recommended 40 dB L_{night} guideline, rather than the 45 dB L_{night} level applied in the Draft regulatory decision documents. While some respondents relied on published health evidence in support of these requests, others questioned the validity, independence, and applicability of the health evidence referenced by ANCA in its assessment. Concerns were also raised regarding the use of population-based impact assessment approaches, with submissions stating that an emphasis on population exposure may not adequately reflect the effects of aircraft noise on rural communities. It was proposed that reliance on population-based metrics could overlook noise deterioration in less densely populated areas and fail to fully capture the experience of communities affected by aircraft operations.

Noise monitoring terminals

A number of submissions raised concerns regarding the adequacy of the existing noise monitoring terminal (NMT) network. Respondents questioned whether the current locations of NMTs accurately reflect the noise environment experienced by residential communities, particularly those situated at a greater distance from noise monitoring stations. A common theme was that recorded noise levels may not fully capture localised noise impacts experienced by residents, leading to calls for a more comprehensive monitoring approach.

Several submissions requested the installation of additional NMTs in areas experiencing aircraft noise, including locations to the east of the southern runway such as Blanchardstown and Castleknock. Respondents suggested that an expanded monitoring network would provide a more representative assessment of community noise exposure and could be used to support the verification and validation of aircraft noise modelling results. Submissions also sought location-specific noise surveys and targeted monitoring in affected communities to better understand local noise conditions and ensure that the assessment reflects the noise experienced by residents in different geographic areas.

Aircraft fleet mix

Submissions expressed concern about the accuracy of the anticipated fleet mix relied upon in the Applicant's forecasts.

Assessment of aircraft noise impacts

Submissions expressed the view that the change in aircraft noise resulting from the proposed development was characterised as minor in the assessment, whereas respondents considered the change to be significant and fundamental in nature, with potentially important implications for affected communities.

ANCA response to issues raised in Theme 4

Submissions in relation to noise measurement, noise metrics and modelling of aircraft noise

Accuracy of aircraft noise modelling

The Aircraft Noise Regulation requires the noise situation at the airport to be assessed in accordance with the Environmental Noise Directive 2002/49/EC (END). The END determines the calculation methodology and noise indicators to be used, the reporting of aircraft noise exposure in terms of area, dwellings and people living in dwellings, and the assessment of harmful effects arising from aircraft noise exposure, including the number of people who are highly annoyed and highly sleep disturbed. For this purpose, ENR designates the airport authority as the noise mapping body on behalf of the action planning authority. The aircraft noise calculation methodology applicable under the regulatory framework is set out in Annex II of the END, as amended, and reflects the European Civil Aviation Conference ECAC Doc. 29, 4th Edition methodology. ECAC Doc. 29 brings together recommended practices for aircraft noise modelling published by the International Civil Aviation Organization (ICAO), the European Civil Aviation Conference (ECAC) and the Society of Automotive Engineers. These bodies provide guidance on how aircraft noise modelling should be undertaken using data supplied by aircraft manufacturers, and the agreed approach is reflected in ECAC Doc. 29. The END uses annual average indicators (L_{den} and L_{night}), and the Regulation prescribes these metrics as the basis for assessing noise exposure and associated health effects. These indicators are intended to assess long-term population exposure and are applied consistently across Europe.

The accuracy of the aircraft noise modelling is also a consideration under the regulatory framework. As noise modelling is a core component of the Aircraft Noise Regulation and supports ANCA's functions under the Act of 2019, ANCA commissioned a technical review of the Applicant's noise modelling, which is included as Appendix C of the DRD. The review considered the choice of aircraft noise modelling software and associated study settings, modelled aircraft types and movements, runway use modelling, modelled routes and dispersion, departure route usage, flight profiles, noise data, evidence of validation, and demographic datasets used to calculate noise exposure statistics. The technical review concluded that the modelling had been carried out in line with best practice based on the data available to the modellers. It found that observed

activity was reflected in the modelling through the preparation of radar-based ground tracks and flight profiles, and that the noise data had been validated using measurements obtained from the Airport noise monitoring terminals. The review also considered the extent to which observed operational activity was represented in the modelling. Radar-based ground tracks and operational data were used to develop the model inputs, ensuring that the assessment reflected actual patterns of aircraft operations during the relevant assessment periods, including variations in runway use and flight activity.

The modelling reports show that these validation activities resulted in modelled levels falling within the modelled uncertainty margin defined by the CNOSSOS-EU Quality Framework. Comparisons of modelled and measured noise levels indicate that modelled aircraft-event levels for the most prevalent aircraft types are well within this margin. Based on the technical review, it is considered that the Applicant's modelling is of a sufficient quality to respond to ANCA's policy requirements as set by the NAO and for end-use as part of ANCA's functions under the 2019 Act.

The modelling was undertaken using the most recent operational and forecasting information available at the time of the assessment. ANCA's technical review found no evidence that outdated data had been relied upon in a manner that would materially affect the conclusions of the assessment. ANCA also notes concerns regarding the modal split assumptions used within the forecasting process. These assumptions formed part of the wider review of the Applicant's operational forecasts, and no evidence was identified to suggest that they would materially affect the conclusions of the aircraft noise assessment.

Assessment of airport operations

The assessment considered a range of forecast operational conditions and included detailed review of the aircraft noise modelling methodology. The technical review included consideration of runway-use modelling, modelled routes and route dispersion, departure route usage, radar-based ground tracks and flight profiles. This ensured that the assessment considered not only the overall level of aircraft noise generated by airport operations but also how aircraft noise may be distributed spatially across communities surrounding the airport. The assessment was informed by forecast noise contour modelling and associated exposure forecasts, which considered the distribution of aircraft movements and resulting noise exposure around the airport. While specific alternative runway operating scenarios were not assessed as standalone cases, as such scenarios could give rise to other noise problems that are unrelated to the development as proposed, the modelling incorporated forecast runway-use assumptions and operational distributions representative of anticipated airport operations. ANCA considers that this approach provides an appropriate basis for assessing likely aircraft noise impacts under the regulatory framework.

The DRD responded to the noise problem identified as part of proposed development sought by the Applicant as set out in Application F23A/0781. The Application was lodged on 15 December 2023 and following a review of the information received, ANCA issued a direction to the Applicant on 1 March 2024 to provide further information. The information requested was substantive and was requested to allow ANCA to better understand the potential noise impacts of the proposed development, the need for potential measures, and to support Appropriate Assessment, Strategic Environmental Assessment, to further examine the forecasts relied on by the Applicant, and to help establish the cost-effectiveness of any additional measures considered by ANCA. On 21 and 24 November 2025, the Applicant provided its response to the Direction.

In the period between the direction to provide information and the response in November 2025, information was made available to ANCA under separate statutory processes. An overview of the key documents and data considered by ANCA in making of the Draft Regulatory Decision is summarised in Appendix A and referenced in the DRD Report. This information comprises of information provided by the Applicant along with wider documentation commissioned by ANCA and information available to ANCA through other sources, including information received under separate statutory processes. In preparing the DRD, ANCA was satisfied that the information available was sufficient to: identify the noise problem arising from the proposed development; consider the existing measures in place at the Airport and understand their potential influence on managing aircraft noise and the effects of aircraft noise; consider what additional measures may be available having regard to the policies and outcomes defined by the amended NAO and identified noise problem; and establish the potential effects of aircraft noise on health and quality of life. Whilst some information was not received by ANCA, it was considered that alternative information could be relied on to support ANCA's decision making. This includes, for example, the preparation of an independent review of the airport's forecasts and analysis carried out by ANCA's technical consultants.

ANCA acknowledges that annual average noise metrics may not fully reflect the experience of communities during prolonged periods of easterly or westerly operations. However, such metrics are required to be applied under the Environmental Noise Directive and Airport Noise Regulation and provide the basis for consistent assessment of long-term aircraft noise exposure across the European Union. Operational variations are considered through the modelling inputs and forecast runway-use assumptions. Through the annual reporting of noise contours to ANCA and the 5-yearly reporting under ENR the actual operations of the airport are reported regularly by the airport, and any emerging consistent change in runway use would be identified through this process and feed into the assessment under ENR strategic noise mapping and NAP reporting against the NAO.

Population exposure assessments and analysis of dwellings, schools and hospitals within forecast noise contours were undertaken to identify locations where elevated noise exposure may occur, where communities may be affected by aircraft noise, and where receptor-based measures or land-use planning considerations may be warranted. While a formal noise envelope was not proposed as part of the draft regulatory measures, (as the amendment of the NAO satisfies the policy-making function of ANCA under the Act of 2019), the assessment utilised forecast noise contours and associated exposure metrics to evaluate the anticipated future noise environment and the likely distribution of aircraft noise impacts. The proposed NAO also incorporates ongoing monitoring of contour areas and population exposure indicators with the expectation that they will reduce, providing a framework for assessing future aircraft noise performance and trends over time.

Aircraft noise metrics and assessment methodology

The assessment is based on the noise metrics defined in the amended NAO, namely the population HA and HSD, along with the L_{den} and L_{night} metrics respectively. These metrics are considered to have the greatest weight of evidence with respect to the harmful effects of aircraft noise. Wider metrics such as the Nx metrics can provide a further understanding of noise impacts with event-based metrics such as the SEL and L_{Amax} describing the levels of noise experience during individual aircraft events. Whilst these metrics have some objective basis for assessing the impacts and effects of aircraft noise, in the context of the proposed development, these metrics do not provide any greater insights to what is described than the L_{den} and L_{night} metrics. For example, use of the SEL and L_{Amax} metrics does not change the conclusions of the assessment because the proposed development will not lead to new locations that would experience such single noise events or the introduction of operations what could create higher levels of event noise. In fact, the forecasts provided by the Applicant indicate that average levels of individual aircraft events are likely to reduce through further modernisation of the airports fleet mix.

ANCA commissioned Professor Charlotte Clark to provide an independent review of the current state of evidence concerning the effects of aviation noise on human health. This review has been used by ANCA in support of its functions and decision-making. The review does not provide a strong rationale for the use of alternative metrics to L_{den} and L_{night}. It notes that EU Directive 2020/367 provides an opportunity for local studies to be used to quantify the population that is highly annoyed and highly sleep disturbed where such studies are of high quality and statistically significant. However, there are currently no such local noise and health studies for Ireland or Dublin Airport.

In relation to sleep disturbance, the Health Evidence Review indicates that, in addition to L_{night}, there is a role for L_{Amax} based metrics and consideration of additional aircraft-

noise-induced awakenings. These metrics can assist in describing the potential risk of being awoken from sleep due to individual aircraft noise events. However, the review also identifies uncertainties, assumptions and complexities associated with their application and calculation. Information on additional aircraft-noise-induced awakenings is therefore considered an important supplementary tool for estimating and managing the effects of aviation night noise and may be used when considering interventions, but it should not be regarded as a primary metric for policymaking.

Submissions requesting additional contour outputs, including N80, N75, N70 and SEL contours, were noted. While such metrics may provide supplementary information regarding aircraft noise exposure, ANCA considers that they are not necessary for defining or assessing outcomes under the proposed NAO, which is based on L_{den}, L_{night} and associated health outcomes. ANCA therefore considers that the continued use of L_{den} and L_{night}, together with the calculation of the population that is highly annoyed and highly sleep disturbed, remains appropriate for setting measurable criteria and expected outcomes as part of the NAO. The use of these metrics also ensures regulatory alignment between the Act of 2019 and the ENR. For night-time noise, L_{Amax} and metrics derived from it, including aircraft-noise-induced awakenings, may be used as supplementary information when assessing the effectiveness of measures and interventions but are not considered appropriate for measuring or defining outcomes under the NAO itself.

With regard to submissions:

- requesting the adoption of the WHO Night Noise Guideline value of 40 dB L_{night}: The assessment has been undertaken using the regulatory framework and methodologies prescribed under the Environmental Noise Directive and aircraft noise regulation. The 45 dB L_{night} contour was therefore applied consistently throughout the assessment and evaluation process.

- requesting that noise metrics be reported separately for individual operational modes rather than solely on an annual average basis: while operational mode specific assessments may provide additional contextual information, the regulatory framework requires assessment using annual average indicators designed to evaluate long-term population exposure and associated health outcomes.

- expressing concerns regarding the use of population-based exposure indicators: the assessment of population exposure is prescribed under the Environmental Noise Directive and aircraft noise regulation and is intended to quantify the number of people potentially affected by aircraft noise. This does not preclude consideration of geographic distribution and community-level impacts, which were also examined through contour mapping and receptor-based assessments.

Noise monitoring terminals

ANCA recognises the importance of ensuring that the aircraft noise monitoring network around Dublin Airport provides appropriate coverage of communities affected by aircraft operations. Under the Act of 2019, ANCA has the power to direct daa to install additional noise monitoring equipment if considered necessary. Since 2019, the airport's noise monitoring network has been substantially expanded following ANCA review and benchmarking of international best practice (from seven to thirty-two by the end of 2025). The location and performance of noise monitoring terminals are kept under ongoing review to ensure that they remain appropriate having regard to aircraft operations, flight paths, population distribution and areas experiencing aircraft noise. Where evidence indicates that additional monitoring would improve the assessment of aircraft noise exposure or provide greater confidence in the monitoring network, ANCA has and will continue to direct the installation of additional monitoring equipment. ANCA notes the requests for additional monitoring in communities including areas to the east of the southern runway and acknowledges concerns regarding the noise measurements for residents located further from existing monitoring terminals. While fixed monitoring locations cannot be provided in every community, the monitoring network forms part of a broader assessment framework that includes detailed aircraft noise modelling and verification against measured noise data. The airport's monitoring network is operated and maintained by an independent specialist provider and is routinely calibrated in accordance with recognised international standards. Measurements collected from the network comprise many thousands of aircraft noise events over extended periods and are used to validate noise modelling outputs. The independent review of the airport's noise modelling undertaken as part of the regulatory assessment identified no concerns regarding the application of measured noise data for model validation purposes. ANCA also recognises the importance of transparency in demonstrating the relationship between measured and modelled noise levels. Accordingly, ANCA will ensure the continued validation of noise modelling against monitoring data and has included associated requirements within the guidance accompanying the amended NAO.

ANCA has an ongoing role in monitoring aircraft noise and aircraft operations, including the review and oversight of noise monitoring terminals to ensure the effective assessment of airport noise impacts at Dublin Airport. Measurements from the Airport noise monitoring terminals have also been used to validate the Applicant's noise modelling.

Aircraft fleet mix

ANCA recognises that the daa already has introduced incentives for quieter aircraft through environmental charges. Under Section 19 of the Act of 2019, ANCA expects the daa to report on how these charges have been used to encourage quieter aircraft and the effectiveness of these changes in reducing aircraft noise. As these charges were first

introduced in 2023, ANCA recognises that it will take some time for the effect of these changes to become measurable. The Applicant's modelling is highly dependent on its forecast operations. The forecasts provided by the Applicant were reviewed both in terms of the number of aircraft and fleet mix associated with the forecast passenger numbers and the plausibility of the fleet mix itself with reference to the airlines using the Airport and their actual aircraft orders. This information was made available to ANCA through ANCA's standardised airport noise reporting template. This review identified no fundamental concerns with the operational forecasts. However, it is recognised that such forecasts are estimates and are based on a range of assumptions and industry trends. It is therefore vital that the noise impacts are routinely monitored and reported. This has led to ANCA developing associated guidance which accompanies the NAO which ANCA will ensure is applied when the noise situation at Dublin Airport is considered by the daa under both the ENR and all associated requirements under the Act of 2019.

Assessment of aircraft noise impacts

ANCA acknowledges that the predicted changes in noise exposure are reported as minor but affected communities may experience those changes differently and consider them important to their understanding. The assessment of the proposed amendments was undertaken using recognised aircraft noise modelling and assessment methodologies. In reference to the scale of change, regard was had to the predicted changes in the noise exposure identified by the technical assessment.

Recommendation on issues raised in Theme 4

Consideration of the submissions related to this theme did not change the outcome of the assessment of the Application prior to making a Regulatory Decision.

Theme 5: Operational management of aircraft activity at Dublin Airport

Issues raised in relation to Theme 5

Potential increase in aircraft activity

Submissions and observations were made to the public consultation regarding the operational management of aircraft at Dublin Airport. These included references to existing and potential future scale of aircraft activity.

Submissions or observations under this theme expressed opposition to increased aircraft activity and airport growth as a matter of principle and did not accept that noise mitigation was an appropriate response to proposed development.

Other observations expressed a counter view and supported airport growth and increase in passenger capacity as a driver of the economy through commerce and tourism.

Several submissions reported the impact of airport noise outside of usual daytime and evening periods where they are experiencing noise from engine testing, taxiing and ground running operations.

Other submissions expressed dissatisfaction with north runway operations during periods of south runway maintenance including where this results in night-time operations being transferred to the north runway. Greater transparency and reporting on the reasons for such closures was also requested, as well as limits on non-emergency night-time maintenance.

The scheduling of aircraft activity at Dublin Airport

Many submissions raised objections to the hours of operation of Dublin Aircraft, the intensity of activity during specific periods or the alternation of runways during periods of maintenance.

Ground noise and engine testing noise

A number of submissions identified ground-based noise as an additional concern alongside noise generated by aircraft in flight. Responses referred specifically to the negative impact of aircraft engine ground running and engine testing activities, especially when occurring during early morning, evening, or night-time periods. Respondents expressed concern that these activities can be highly disruptive due to the intensity and tonal characteristics of engine noise, particularly when background noise levels are lower. Submissions highlighted the potential for disturbance to sleep, rest, and general quality of life for nearby residents, as well as impacts on the enjoyment of homes and outdoor spaces. Some responses emphasised that ground noise events may be perceived differently from overflight noise because they can be prolonged in duration and originate from a fixed location, resulting in repeated disturbance for communities in proximity to airport operations. Concerns were therefore raised regarding the management, monitoring, and mitigation of ground noise sources as part of the overall assessment of airport-related noise impacts.

ANCA response to issues raised in Theme 5

Potential increase in aircraft activity

It is not ANCA's function to determine whether growth in aircraft activity should be facilitated.

The Fingal Development Plan contains provision to facilitate the operation and future development of Dublin Airport, in line with Government policy and the Dublin Airport Local Area Plan 2020, or any subsequent LAP or extension of same, recognising its role in the provision of air transport, both passenger and freight (Objective DA01). Objective DA04 further provides that the required infrastructure and facilities are provided at

Dublin Airport so that the aviation sector can develop further and operate to its maximum sustainable potential, whilst taking into account the impact on local residential areas, and any negative impact such proposed developments may have on the sustainability of similar existing developments in the surrounding area, and the impact on the environment, including the climate.

It is the function of the planning authority to determine whether the growth in passenger numbers and the construction and operation of supporting infrastructure aligns with those policies and the proper planning and sustainable growth of the area. ANCA's Regulatory Decision does not prevent the planning authority from granting or refusing permission.

ANCA's role in the context of the ICAO Balanced Approach is to identify and determine measures that can reduce the impacts of aircraft noise, and where necessary, introduce noise-related operating restrictions as a last resort. The policies and associated expected outcomes that guide such decisions are defined by the NAO. The NAO does not itself enable or facilitate growth. Instead, the NAO sets the policies and expected outcomes that seek to identify and manage aircraft noise impacts in the context of sustainable development recognising that the responsibilities for aircraft noise management measures are shared between a range of stakeholders. The NAO therefore sets out the expected noise outcomes and key considerations that shall apply when making noise management decisions as part of the sustainable development of Dublin Airport. In this context, ANCA's role in relation to the proposed development has been to identify the most appropriate combination of noise management measures that should accompany the proposed development having regard for wider planning processes including the determination of appeal of the Relevant Action to ACP which is considering new operating restrictions and noise mitigation measures during night-time hours.

ANCA's examination of the Application evidences a view that the proposed development potentially enables a modest increase in noise exposure due to higher overall activity. The proposed development includes growth in overall aircraft activity, leading to increased noise exposure across key indicators, as expressed through objective and measurable health impact indicators, for which, there is not appropriate mitigation by way of operational or passive measures within the Application. On 22 January 2026, ANCA determined that a noise problem would arise through the implementation of the development as proposed and proceeded to adopt the Balanced Approach.

ANCA then identified and evaluated measures and determined the most cost-effective measure to address the potentially modest increase in noise exposure due to the Application as proposed to be a new expanded noise insulation scheme.

ANCA has considered the potential impact of the development and made provision in a regulatory decision for an extended insulation scheme to mitigate the aircraft noise

impact of the development as proposed. Through an ongoing eligibility review process, the proposed sound insulation grant scheme will respond to any changes to the noise climate arising from additional air traffic arising from this development proposal. ANCA determined that it was not necessary to introduce or amend an operating restriction to address the modest increase in noise exposure forecast associated with the Application.

ANCA also notes the opposing views as expressed in submissions regarding increased aircraft activity and the growth of Dublin Airport, both currently and as may arise through the development as proposed.

The scheduling of aircraft activity at Dublin Airport

ANCA does not have a role in the allocation of airport slots or the scheduling of individual flights at Dublin Airport. Proposals made through the consultation concerning the scheduling of flights outside core sleep hours, the timing of individual cargo flights, or the general distribution of flights throughout the day are therefore not matters that ANCA can determine through this process.

Night-time operations at Dublin Airport are currently governed by planning conditions attached to the North Runway Planning Permission, which restrict use of the North Runway between 23:00 and 07:00 (Condition 3(d)) and limit night-time aircraft movements to 65 per night (to be calculated in accordance with Condition 5). An Coimisiún Pleanála's decision of July 2025 on the North Runway Relevant Action would replace these with a Noise Quota Scheme with an annual limit of 16,260, a restriction on use of the North Runway between 00:00 and 06:00, and an annual limit of 35,672 night-time aircraft movements. That decision is the subject of judicial review proceedings and, following notification by the European Commission that it does not consider the decision to have been adopted in accordance with the Balanced Approach, is being reconsidered by An Coimisiún Pleanála. However, as both sets of measures are presumptively valid, both have been recorded in the current inventory in Section 9 of the DRD Report. Preferential runway use is also regulated by planning conditions, subject to exceptions relating to safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports.

As set out in Section 10 of the DRD Report, the forecasts demonstrate that the expected outcomes of the 2026 NAO can be met with or without the proposed development under each of the night-time operating scenarios considered. ANCA therefore determined that the proposed development does not require the reconsideration of night-time operating restrictions, and that decisions made with respect to these through other processes can be compatible with the proposed development.

Ground noise and engine testing noise

Planning conditions and the Integrated Aeronautical Information Package contain measures for the operation and mitigation of engine testing. Ground noise is addressed in the environmental impact assessment. ANCA's analysis is that the impact of ground noise is limited compared to the impact of aircraft noise with limiting of aircraft noise in the air and on the runways being the primary policy objective of the NAO and consequently the application of the ICAO Balanced Approach through the Act of 2019.

Recommendation on issues raised in Theme 5

Consideration of the submissions related to this theme did not change the outcome of the assessment of the Application prior to making a Regulatory Decision.

Theme 6: Aircraft noise - monitoring and access to information

Issues raised in relation to Theme 6

Aircraft noise monitoring, modelling and reporting

Submissions raised issues regarding the monitoring of aircraft noise and requested ongoing, independent monitoring to verify modelled noise levels. Requests were made for additional noise monitoring stations and for reporting across a wider range of noise metrics.

Other submissions identified a need to monitor and verify the effectiveness of mitigation measures. It was submitted that the existence of a mitigation measure does not demonstrate that the measure is effective, and that environmental mitigation can only achieve its intended purpose where it is capable of delivering the level of protection for which it was designed.

Some submissions expressed dissatisfaction with the effectiveness of ANCA in addressing the aircraft noise experienced by residents, including concerns regarding the noise impacts since the opening of the North Runway.

Reporting the impact of aircraft noise

Some submissions requested the publication of data in a specific format relating to individual aircraft noise events, including L_{ASmax} and SEL, to provide the public with more detailed information on aircraft noise.

Fleet renewal

Concerns were raised by a number of respondents in relation to the extent to which fleet renewal would deliver the noise benefits described in the assessment. Respondents stated that assumptions regarding the introduction of newer aircraft types may overstate potential reductions in aircraft noise and suggested that any benefits may be less

significant in practice. Further concerns were raised regarding the rate at which older aircraft would be replaced and the extent to which improvements in aircraft technology would be experienced by communities affected by aircraft noise.

ANCA response to issues raised in Theme 6

Aircraft noise monitoring, modelling and reporting

ANCA monitors and reports on the implementation of the NAO (NAO) through statutory annual reviews of the effectiveness of the noise mitigation measures and operating restrictions in place at the airport. The process of strategic noise mapping and noise action planning also reviews the NAO performance on a five-year cycle under the Environmental Noise Regulations (ENR). Theme 4 provides information on noise metrics and noise monitors around Dublin Airport.

Reporting the impact of aircraft noise

Information on the noise impact of individual aircraft events is available through the WebTrak public web portal, a service of the airport authority that monitors and provides information on flights arriving at and departing from Dublin Airport. WebTrak provides near real-time information on flight origins and destinations, aircraft types, altitudes and flight paths. Users can identify their location by Eircode or map and view flight data in relation to that location. The service also provides information on noise preferential routes and historical flight information and allows users to lodge a noise complaint relating to a specific aircraft noise disturbance. Requests for additional metrics through these resources may be made to the airport authority.

The Dublin Airport noise information portal, InsightFull, also contains information on aircraft activity around the airport, including flight frequency, altitude and overflight definitions.

The Dublin Airport website also contains monthly noise & operations reports covering airport operations and runway use, noise complaints and flight-track monitoring. Quarterly noise and flight track monitoring reports also provide information on flight-track monitoring, airline track adherence and the location and results of noise-monitoring terminals around the airport, including comparison with annual average noise contours from the previous year.

ANCA does not have a role in relation to WebTrak or InsightFull services or its quarterly or monthly reporting. ANCA monitors the noise situation at Dublin Airport through the statutory processes under the ENR and its annual reporting functions under the Act of 2019. Annual contour maps are also available on the ANCA website that provide information on the noise climate using the metrics of the Environmental Noise Regulations.

Fleet renewal

As part of the DRD, ANCA reviewed the improvements in aircraft noise arising from newer and more modern aircraft types. An example of this is presented for the Boeing 737 series of aircraft. This analysis highlights improvements in aircraft noise performance that can be expected from fleet renewal. Based on the forecasts provided by the Applicant for the proposed development, the assessments and associated assessment years considered by ANCA are representative of near-term in the context of fleet renewal. Given the known performance improvements of the latest generation of aircraft, alongside its considerations of fleet modernisation at Dublin Airport, ANCA is satisfied that the benefits of fleet renewal on reduced noise levels can be realised and the expected outcomes for reduction in numbers of people HA and HSD set out in the NAO can be achieved. However, the proposed insulation scheme will respond to the noise impact as it arises and will provide mitigation within the 60dB L_{den} contour regardless of the pace of fleet renewal.

Recommendation on issues raised in Theme 6

Consideration of the submissions related to this theme did not change the outcome of the assessment of the Application prior to making a Regulatory Decision.

Theme 7: Airspace design and operation

Issues raised in relation to Theme 7

Flight paths, environmental corridors and performance of aircraft

Submissions or observations under this theme expressed concern with respect to aircraft performance within existing flight corridors including track deviations. Others requested the implementation of 'straight-out' flight paths for aircraft departures from the north runway whilst others stated that current flight paths have not been tested from a noise perspective.

Respondents requested that individual flight path waypoints and corridors be moved to reduce the impact of aircraft noise on residential areas. Requests were made for aircraft altitude restrictions in some areas. Some submissions also reported their experience in recent years of aircraft flying lower over their properties outside of normal daytime operations and causing significant noise disruption. Concerns were expressed about increased noise on eastward departures.

Submissions stated that an increased concentration of flight paths resulted in more frequent aircraft overflights over some communities and proposed that dispersed operating patterns should be considered to spread the noise more evenly between communities. In a similar theme, some submissions requested alternating runway use as insulation alone does not deliver a reduction in noise when using outdoor space.

Opposing views were also made in other submissions that expressed dissatisfaction in relation to the spread of noise and the areas affected.

Observations proposed a review of arrival routes, holding patterns and aircraft stacking to prevent aircraft flying over certain locations. Submissions referenced the noise impact on uninsulated homes when flight paths change. Some respondents stated that they purchased homes in an area that they did not expect to be under a flightpath.

Some participants stated their view that there was not adequate consultation or assessment of current flight paths and requested that the flight paths are independently reassessed. Submissions did not accept the outcome of modelling that uses pre-2022 flight paths. Respondents requested enforcement of flightpaths by ANCA. Other submissions requested independent assessment of flight paths by ANCA including a recommendation of most sustainable route to reduce noise impact on communities.

Other responses proposed that ANCA should request a review of airspace by others. It was also submitted that ANCA should not have regard to airspace safety and operation matters outside of the regulatory remit of the authority. A submission requested that ANCA would distinguish matters of consideration within and outside of the ANCA process.

Other submissions expressed opinions regarding the legality of current flight paths and communities that are being overflown. These included statements that the current flightpaths are unauthorised, and it was further suggested that substitute consent (retention permission) is required for the current flight paths. Other submissions expressed concern that the amended NAO legitimises the existing flight paths.

Submissions also expressed doubt on ANCA's jurisdiction to make a DRD on a planning application which the law does not allow An Coimisiún Pleanála to consider due to alleged unauthorised development in relation to the flight paths and the breach of 32 MPPA.

Other submissions identified concerns that Dublin Airport is operating above the permitted terminal capacity of 32 MPPA.

Some submissions expressed an alternative view and supported the Application and increased passenger capacity, including on the basis of the economic benefits associated with growth at Dublin Airport, provided that surrounding communities are protected from increased aircraft noise. Some submissions expressed the view that people who choose to live near an airport should expect aircraft noise to have an impact on their quality of life.

Submissions also raised issues regarding how decisions on future airport capacity should be made. Some participants considered that planning applications relating to

airport capacity should be determined at national government level rather than by a local authority and referred to national legislation in relation to airport capacity limits.

Some submissions proposed that the Application should not be determined until the appeal concerning night-time airport operations has concluded.

ANCA response to issues raised in Theme 7

Flight paths, environmental corridors and performance of aircraft

ANCA notes the range of concerns raised in submissions regarding the design and operation of flight paths at Dublin Airport and the resulting distribution of aircraft noise across surrounding communities. These concerns included track deviations, changes to flight paths following the commencement of North Runway operations in 2022, the concentration or dispersal of flight paths, aircraft altitude, increased noise associated with some departure routes, changes in the communities being overflown, and the effects of changes in flight paths on residential amenity.

The design of airspace and the operation of flight paths are significant factors in determining the locations and communities that experience aircraft noise. However, the design and operation of flight paths, and related planning enforcement matters, are outside the regulatory scope of this consultation. Flight paths are designed by the airport authority in conjunction with the air navigation authority and are subject to separate regulatory and safety processes. ANCA does not have the statutory function to design, approve, alter or enforce individual flight paths. Consequently, requests for ANCA to introduce or require particular flight-path configurations, including straight-out departures, relocated waypoints or corridors, particular altitude restrictions, alternative runway-use arrangements, or changes to arrival routes and holding patterns, cannot be determined through this aircraft noise regulatory process.

ANCA can, however, consider the aircraft noise impacts associated with flight paths where changes to those flight paths form part of, or are foreseeable as a consequence of a proposed development at Dublin Airport. The Application as proposed does not forecast any changes to the flight paths as part of the proposed development.

The NAO has relevance to all stakeholders whose functions and responsibilities have the potential to have an impact on the noise climate around Dublin Airport. It is therefore appropriate that the environmental consideration of any future changes to airspace to flight paths at Dublin Airport would have regard to the NAO. It has been stated that it is the Minister for Transport's intention that the flightpaths for Dublin Airport will be reviewed, but no date has been published for this.

When carrying out its functions under the Aircraft Noise Regulation and the Act of 2019, ANCA must have regard to the current noise situation at Dublin Airport. ANCA's Draft Regulatory Decision and the proposed amendments to the NAO have adopted the noise

situation in 2023 as representative of the current situation, taking account of the airport operations, infrastructure and flight paths in place during that year. The proposed development does not propose changes to the current flight paths, and ANCA has no evidence of foreseeable changes to those flight paths arising from the proposed development.

In September 2026, following investigation, the planning authority concluded that the North Runway Planning Permission does not regulate or control flight paths and that flight paths are not "development" for the purposes of the Planning and Development Act 2000 (as amended) and therefore are not capable of being governed by a planning permission.

In Ireland, the design, regulation and operational control of airspace are matters for bodies other than ANCA. The Irish Aviation Authority (IAA) and AirNav Ireland have distinct responsibilities in relation to airspace regulation and air navigation services. Changes to the use, structure or classification of Irish airspace are considered through processes separate from ANCA's aircraft noise regulatory process.

As regards the submissions made on insulation eligibility with respect to flight paths, the proposed noise mitigation home insulation scheme does not have a fixed eligibility boundary. Eligibility is initially based on forecast exposure and subsequently based on actual noise exposure under a review every two years. This allows the scheme to respond to changes in airport operations or flight paths arising through other processes where those changes affect the noise climate.

The performance of aircraft within environmental noise corridors, and measures to address non compliances, are reported annually by the airport authority as prescribed by Section 19 of the Act of 2019. These reports are published on the ANCA website. The air navigation service provider manages individual aircraft in alignment with the requirements of the Integrated Aeronautical Information Package. The safe and efficient operation of airspace, including altitude and vector management come within the remit of that authority. Dispersion of aircraft are managed within the context of the environmental corridors in place at the airport.

Planning conditions regulate runway selection (including exceptions relating to safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports).

Recommendation on issues raised in Theme 7

Consideration of the submissions related to this theme did not change the outcome of the assessment of the Application prior to making a Regulatory Decision.

Theme 8: Planning related matters

Issues raised in relation to Theme 8

Planning conditions, enforcement and compliance

Submissions and observations to the public consultation under this theme identified concerns regarding the planning and development process, including the enforcement of and compliance with existing planning conditions relating to runway use, aircraft movement limits and permitted passenger terminal capacity. Submissions also referred to ongoing planning appeals and legal proceedings concerning planning decisions and their implementation and expressed views regarding compliance with the conditions attached to the North Runway planning permission and existing airport capacity limits.

Residential development, land-use planning and airport noise zones

Some observations concerned residential development and land-use planning in areas affected by airport noise. Some submissions raised the issue of approval of residential development near the airport and ANCA's role in the assessment of residential planning applications. It was submitted that the land-use planning pillar of the Balanced Approach had not been adequately implemented because the airport noise zones require review. Concerns were expressed that the existing development plan noise zones do not adequately reflect current aircraft noise exposure or current flight paths and that the zones should therefore be reviewed.

Some submissions supported a review of the development plan airport noise zones and ANCA's participation in that process. Conversely, other submissions raised concerns regarding ANCA's independence and potential conflicts arising from its involvement in the noise action planning process, including encroachment analysis and any participation in a review of the airport noise zones. It was also submitted that ANCA could not properly exercise its statutory duties without first establishing the impact that could result from changes to noise zoning.

Other submissions expressed a view that planning policy relating to airport development and aircraft noise should be aligned across the relevant local authorities and An Coimisiún Pleanála.

ANCA response to issues raised in Theme 8

Planning conditions, enforcement and compliance

The Act of 2019 requires that FCC acts independently in the performance of its functions under that Act. As a result, there is an administrative separation between ANCA and the Planning and Development Department of FCC, which is the department considering whether permission should be granted in respect of planning application F23A/0781.

Under section 34B of the Planning and Development Act 2000 (as amended), the planning authority referred the Application to ANCA for assessment of the aircraft noise impacts of the proposed development. Following the identification of a noise problem, ANCA proceeded to review and subsequently propose amendments the NAO, apply the Balanced Approach (BA) and make a Draft Regulatory Decision (DRD). Having regard to the submissions and observations received through public consultation, ANCA will make a Regulatory Decision (RD) containing conditions that the planning authority is required to incorporate into its decision on the Application, whether permission for the proposed development is granted or refused.

Many submissions to the consultation referred to ongoing planning appeals and legal proceedings. To the extent that these relate to the interpretation, compliance, enforcement or implementation of planning permissions and conditions, they are matters for the relevant planning or legal processes rather than matters that ANCA can determine through this aircraft noise regulatory process. As required by law, ANCA has presumed that any final decision of a public body, including An Coimisiún Pleanála, is valid unless subject unless quashed by order of the Superior Courts.

Residential development, land-use planning and airport noise zones

The Fingal Development Plan 2023–2029 provides for aircraft noise zones in the vicinity of Dublin Airport as a land-use planning mechanism for development in areas potentially affected by aircraft noise. Objective DAO15 of the Development Plan relates to the ongoing review of the operation of these Noise Zones. Fingal County Council has also included actions in the Dublin Airport Noise Action Plan relating to matters raised under this theme.

ANCA role in relation to planning applications is set out in the Planning and Development Act 2000 and is confined to applications where in ANCA's opinion there is the need for the assessment for a noise related action or an indication that an operating restriction may be required, and where the application is for a relevant action only.

Submissions relating to whether the existing airport noise zones adequately reflect the current aircraft noise situation and current flight paths and requested that the zones be reviewed are noted. The review and amendment of development plan noise zones take place through the relevant land-use and development planning processes rather than through ANCA's determination of a regulatory decision. Through the consideration of the Land Use Planning and Management pillar of the ICAO Balanced Approach for the purposes of the Draft Regulatory Decision, ANCA analysed the operation of the noise zones and observed that they have yet to be updated with current and future forecasts of activity and were based on forecasts prepared in 2018, prior to the opening of the North Runway and the associated airspace changes, such that they do not fully represent all areas that are or could be affected by aircraft noise. On 2 March 2026, ANCA wrote to the

planning authority to recommend that the FDP 2023-2029 airport noise zones be reviewed and that the updated noise zones align with the key metrics of the ENR, advising that '*Any such review of land use management around Dublin Airport and how the measures incorporated within the land-use planning regime should be carried out with regard to ICAO guidance, which has the objective to encourage compatible land use around airport facilities, and direct incompatible land use away from airport environs*'. On 14 May 2026, the planning authority confirmed its intention to review the airport noise zones as part of the overall process to review the Fingal Development Plan 2023-2029 in accordance with the requirements of the Planning and Development Act 2024. ANCA will be available to advise the planning authority in that review and will continue to track the number of dwellings, schools and hospitals exposed to aircraft noise above 65 dB Lden and/or 55 dB Lnight.

ANCA's proposed sound insulation grant scheme does not have fixed eligibility boundaries and is based on forecast exposure and subsequently based on actual noise exposure under a review every two years. The scheme can therefore respond to qualifying changes in the aircraft noise climate, including changes arising through planning or other processes.

Having regard to submissions that expressed a view that planning policy relating to airport development and aircraft noise should be aligned across relevant local authorities and An Coimisiún Pleanála, it is noted that the coordination of wider planning policy are outside the scope of ANCA's regulatory decision on the aircraft noise implications of the proposed development. However, the proposed development has been assessed on a regional basis, having regard to the impact of aircraft noise from 40dB L_{night} and 45 dB L_{den}.

Recommendation on issues raised in Theme 8

Consideration of the submissions related to this theme did not change the outcome of the assessment of the Application prior to making a Regulatory Decision.

Theme 9: Additional matters raised

Issues raised in relation to Theme 9

This Theme addresses submissions made relating to the process and procedure ANCA has followed as part of ANCA's assessment of the potential aircraft noise impacts of the proposed development.

The public consultation asked for submissions and observations on the DRD and related report, the proposed amendments to the NAO, the draft environmental reports for the purposes of strategic environmental assessment of the DRD and the proposed amendments to the NAO, and the AA Screening Reports. Some submissions and

observations identified or included additional information for the attention of ANCA through the consultation process that are outside of the regulatory remit of ANCA or the scope of this consultation. ANCA has acknowledged and summarised those submissions and observations below.

Airport growth, expansion and regional development

Submissions and observations expressed differing views on the future growth and expansion of Dublin Airport. Some participants supported transferring future airport growth to other airports to achieve a more balanced distribution of aviation activity and national development. Requests were also made for additional airports to be developed to distribute flights outside Dublin and reduce the impact of aircraft noise.

A number of submissions expressed opposition to increasing the permitted passenger capacity of Dublin Airport and requested that the Application be refused on the basis that increased passenger capacity would result in increased aircraft activity, particularly during night-time hours. Some submissions considered that growth to 40 million passengers should not be permitted until fleet modernisation has occurred, while others proposed that the Application should not be determined until the appeal relating to night-time airport operations has been concluded.

Economic impacts

Many submissions recognised the positive contribution that Dublin Airport makes to the local and national economy. Other submissions questioned the economic case for airport expansion, particularly in relation to outward tourism that may be facilitated by higher passenger numbers suggesting that the economic arguments in favour of expansion at Dublin Airport are flawed because there would be a net exit of passengers and that CSO data illustrates a net loss to the Irish economy.

Climate change and carbon emissions

Respondents expressed the view that aviation growth would increase air pollution and/or carbon emissions. Submissions also addressed the potential conflict between permitting additional passenger growth and Ireland's commitment to reducing carbon emissions.

Several submissions discussed the potential financial cost to the State of carbon emission penalties if prescribed limits are exceeded and the potential impact of permitting additional flights on carbon targets. Submissions stated that ANCA should take into account the costs associated with climate change.

Submissions also raised the issue of ANCA's requirements under Section 15 of the Climate Action and Low Carbon Development Act 2015.

Air quality

Participants raised concerns regarding potential long-term health implications associated with reported high levels of jet fuel fumes. Concerns were also expressed about how certain days, or wind conditions can affect day-to-day living conditions.

A respondent stated that the environmental impact of thousands of additional houses requiring air conditioning should be considered where residents cannot open their windows.

Noise, traffic and property impacts

Observations stated that increasing the passenger cap would result in increased aircraft noise and traffic noise associated with people travelling to and from the airport.

Submissions also expressed concerns about reductions in property values arising from airport expansion, aircraft noise and airport operations.

Observations expressed the view that purchasers of houses affected by aircraft noise, particularly houses located under flight paths, should be informed of this before purchasing so that they can make their decision with this information in advance.

Aircraft noise complaints and oversight

Submissions expressed dissatisfaction with responses received from the airport authority regarding aircraft noise complaints and complained about the perceived lack of oversight of the airport authority's complaints procedure.

Some observations stated that aircraft noise complaints should be considered in the design of noise mitigation measures.

An observation stated that it was inappropriate that noise complaints are not issued by daa to ANCA and suggested that community complaint reports misrepresent issues of concern.

An observation stated that airport expansion should not proceed because of concerns regarding the airport authority's current management of disabled passengers and passengers requiring special assistance.

Submissions asked for ongoing and proactive community engagement by ANCA, including engagement with communities outside Fingal that are affected by aircraft noise.

Process, procedure and documentation

Submissions expressed dissatisfaction with the timing or duration of the process of consultation; alignment/sequencing with other external processes, procedural or

documentation; the availability of information including requests for additional data to be published, including all material relevant to decision making.

Other submissions relating to the consultation process compliance with statutory requirements, accuracy of consultation documentation, procedural adequacy, and matters raising potential legal or regulatory concerns including a position that ANCA did not follow the balance approach in the assessment.

Some submissions related to the independence of ANCA, with some suggesting that responsibility for aircraft noise management at Dublin Airport would be more appropriately assigned to other authorities. Other submissions expressed the view that ANCA was not acting on behalf of the public, while concerns were also raised regarding a perceived conflict of independence between ANCA and Fingal County Council.

ANCA response to issues raised in Theme 9

Airport growth, expansion and regional development

Submissions and observations relating to the development of other airports and the distribution of aviation activity outside Dublin do not come within ANCA's remit as competent authority.

ANCA is the competent authority for the implementation of the process of aircraft noise assessment and regulation through the processes contained within the Act of 2019, Section 34B of the Act of 2000 and the Aircraft Noise Regulation. Matters raised in submissions related to the functions of the planning authority are not addressed through this process. These include decision to grant or refuse planning permission for the proposed development; compliance with planning conditions relating to 65 flights per night or the annual passenger capacity limit of 32 million.

Economic impacts

Submissions and observations relating to the economic implications of inward and outward tourism do not come within ANCA's remit through its functions as competent authority. It does not come within the authority's remit to base decisions on the CSO data which demonstrates that outward tourism represents a net loss to the Irish economy.

Climate change and carbon emissions

Submissions and observations relating to aircraft emissions other than noise do not come within ANCA's remit through its functions as competent authority.

ANCA acknowledges that it is a relevant body and it must in so far as practicable perform its functions in a manner consistent with the named plans and objectives listed in section 15 of the Climate Action and Low Carbon Development Act 2015 as amended.

However, the Supreme Court also made clear in *Coolglass Wind Farm Limited v An Coimisiún Pleanála* [2026] IESC 5 that because Section 15 of the 2015 Act applies to all relevant bodies, and the exercise of their functions, the impact in fact of the section will vary depending on the functions of the relevant body, and the matters to which they are obliged to have regard, or to implement.

ANCA's functions are limited to carrying out an aircraft noise assessment of the Application through the process prescribed by the Aircraft Noise Regulation, Section 34B of the Act of 2000, and section 9 of the Act of 2019.

In that respect, the final Environmental Report for the proposed amendments to the NAO scoped out carbon emissions on the basis that the amended NAO is a noise management policy only, and does not change operating procedures at the airport, so the amended NAO will not influence aircraft movements, flight paths, fuel burn or emissions. Similarly, the final Environmental Report for the RD scoped out carbon emissions on the basis that the measure proposed in the RD (a noise insulation scheme for residential dwellings) will also not alter operating procedures at Dublin Airport. Both the amended NAO and the RD therefore have no pathway to effects on the objectives listed in section 15 of the Climate Action and Low Carbon Development Act (as amended).

It is a matter for the Planning Authority to determine whether a grant of planning permission for the Infrastructure Application would be consistent with the policies and objectives listed in section 15 of the Climate Action and Low Carbon Development Act (as amended).

Air quality

Submissions and observations relating to aircraft emissions other than noise do not come within ANCA's remit through its functions as competent authority. The submissions regarding high levels of jet fuel fumes and the environmental impact of air conditioning are outside of the scope of this proposed Regulatory Decision.

Noise, traffic and property impacts

Submissions and observations relating to property values do not come within ANCA's remit through its functions as competent authority.

The submission that increasing the passenger cap would lead to increased aircraft noise has been addressed in the proposed Regulatory Decision with the proposed introduction of a new residential sound insulation grant scheme. However, road traffic noise does not come within the scope of ANCA.

Aircraft noise complaints and oversight

ANCA does not have a role in relation to Dublin Airport complaints management processes. The Noise Action Plan for Dublin Airport 2024–2028 includes a range of actions and areas for improvement for the noise management framework at the airport. These will be progressed during the term of the plan.

The management of aircraft noise complaints by the airport authority is outside the scope of this aircraft noise assessment. Noise complaints are an important consideration for ANCA in its monitoring role. However, the application of the Balanced Approach is prescribed where a noise problem has been identified at an airport.

The airport authority's management of disabled passengers and passengers requiring special assistance is outside the scope of the Aircraft Noise Regulation and the Act of 2019, and the Regulatory Decision.

Statutory consultation and informal community engagements by ANCA are available to all communities impacted by aircraft noise from Dublin Airport regardless of geographic or administrative location.

Process, procedure and documentation

The process of public consultation was undertaken through the provisions of the Act of 2019, having regard also to the requirements of the process of strategic environmental assessment which align with the principles of access to information and public participation under the Aarhus Convention. ANCA provides information through its website in a format that is accessible to a wide audience and also facilitates access to additional information in specific formats on request, including but not limited by the Freedom of Information Act and the Access to Information on the Environment Regulations.

The process of implementation of the ICAO Balanced Approach was documented in the Draft Regulatory Decision Report and available for public consultation.

Fingal County Council is the designated competent authority for the purposes of the Act of 2019, giving additional effect to the Aircraft Noise Regulation. ANCA is the independent directorate within Fingal County Council responsible for the implementation of this function. For this purpose, and as required by the Aircraft Noise Regulation, ANCA is independent of organisations involved in airport operations, air transport or air navigation service provision, or organisations representing those interests, and is also independent of residents living in the vicinity of the airport.

Recommendation on issues raised in Theme 9

Consideration of the submissions related to this theme did not change the outcome of the assessment of the Application prior to making a Regulatory Decision.

4.4 ANCA's decision/determination on DRD

Themes frequently identified in submissions and observations related to the impact of aircraft noise on health, wellbeing, and quality of life in general. Many of the points raised in the submissions were addressed in the DRD and by the amended NAO and the SEA. Aspects of submissions that were relevant to more than one theme were addressed in the most appropriate section in the interest of clarity and to avoid repetition.

Some submissions and observations referenced matters which were either outside the scope of this consultation and/ or not within the regulatory remit of ANCA to consider. Nonetheless, the inclusion of these matters gave helpful context to the submissions when reviewed by ANCA.

4.5 Environmental Assessments

4.5.1 Strategic Environmental Assessment (SEA) – DRD

ANCA carried out Strategic Environmental Assessment (SEA) of the DRD. The SEA Draft Environmental Report for the DRD was available for public inspection and comment during the process of public consultation between 28 May 2026 and 03 September 2026.

Matters raised during this period in respect of the SEA Draft Environmental Report have been addressed here and are cross referenced in the SEA Statement.

Issues raised in relation to SEA – DRD

Scope of the assessment, airport growth, operating times, flight numbers, flight paths, noise levels and emissions.

Observations stated that growth is included in the environmental assessment due to the use of 2023.

Others raised issues regarding the SEA scoping noise out of a noise plan and climatic factors out of a growth plan, and expressed dissatisfaction that it required no monitoring, and rested on a no-significant-effect finding because it depends on the 2023 baseline.

Some submissions expressed dissatisfaction that the SEA scoped Noise and Vibration out of the assessment, on the stated basis that the objective is unlikely to be affected and that there will be no alteration to the operating procedures.

Submissions further stated that the Draft SEA Environmental Report scopes Biodiversity (Flora and Fauna) out entirely.

Consideration of the proposed amendments to the NAO and DRD separately for SEA

Submissions expressed the view that the NAO and DRD should be considered as one single framework and not as individual plans.

Alternatives

Submissions raised the issue that the SEA of the DRD did not assess reasonable alternatives.

Modelling and night-time data

Submissions expressed opinions that the SEA fails to recognise the difficulties in the modelling and the missing night-time data.

Cumulative effects and inter-relationships

Several responses raised the matter of cumulative effects and inter-relationships to other Plans and Projects, particularly the Infrastructure Application.

EPA Submission

As one of the prescribed Environmental Authorities under the SEA Regulations the EPA made a submission on SEA Draft Environmental Report.

ANCA response to issues raised in Strategic Environmental Assessment (SEA)-DRD

Scope of the assessment, airport growth, operating times, flight numbers, flight paths, noise levels and emissions.

The DRD focuses on the mitigation measures to address the noise problem identified at Dublin Airport arising from the Infrastructure Application (F23A/0781), with the measure proposed being the implementation of a noise insulation scheme. The DRD does not concern the expansion of Dublin Airport in regard to the increase in passenger numbers from 32 MPPA to 40 MPPA, which is the subject of the Infrastructure Application. Rather, it is restricted to the mitigation of the noise problem that would arise from the proposed development.

The SEA assessed the DRD against a 'future baseline', which describes how environmental conditions would develop in the absence of the DRD, but with the proposed amendments to the 2022 NAO in place. The future baseline assumes that daa will seek to grow Dublin Airport in line with existing national, regional and local planning policy, which provides for an increase to approximately 40 MPPA by 2030 and approximately 54 MPPA from 2050, and that the Infrastructure Application, which supports growth to 40 MPPA, is consented and carried forward. The future baseline also accounts for the ongoing modernisation of the aircraft fleet, including improved engine technology, which is expected to occur irrespective of the RD. Accordingly, the plan-level effects of airport growth form part of the baseline rather than being effects of the DRD, and the SEA considers only the difference that the DRD makes relative to that baseline.

The DRD is neutral as to whether growth occurs and does not constrain the planning authority or An Coimisiún Pleanála in deciding any application for development necessary to deliver growth, including the Infrastructure Application. Any such development will be subject to EIA and AA (or screening for EIA and AA) on its own terms. Accordingly, impacts that arise from growth, as opposed to the noise mitigation measure proposed in the DRD, were scoped out. ANCA is satisfied that this was the appropriate approach to assessing a plan that is restricted to aircraft noise mitigation, as it leaves other plan-making and consent-granting bodies free to respond appropriately to other environmental impacts.

Several environmental factors were scoped out of the Environmental Report on the basis that the measure proposed in the DRD, a noise insulation scheme for residential dwellings, will not alter operating procedures at Dublin Airport. The scheme does not influence aircraft movements, flight paths, fuel burn or emissions. It therefore has no pathway to effects on air quality, carbon and climate change or biodiversity, including through any change in the overflying of designated sites; the AA Screening Report reached the same conclusion in respect of European sites. Noise and Vibration was scoped out as a standalone factor because the scheme will not alter the aircraft noise generated by operations at Dublin Airport; its effect is to reduce internal noise levels in eligible dwellings, and that beneficial effect was assessed under Population and Human Health, which were scoped in.

The SEA process determined no likely significant adverse effects for the DRD against that baseline. Under the SEA Regulations, if no likely significant effects are identified, no monitoring is required. Notwithstanding this, eligibility under the noise insulation scheme will be reviewed every two years by reference to the 60 dB Lden contour for the preceding calendar year.

Consideration of the proposed amendments to the NAO and DRD separately for SEA

The proposed amendments to the NAO and DRD were considered separately, each subject to their own SEA process as they are considered as independent 'plans' under the SEA guidance and they are considered separate plans for the purposes of the SEA Directive and the Irish regulations. Furthermore, the NAO is first set to outline the objectives to be achieved. The DRD measures therefore then follow and comprises the implementation of the measures required to meet the NAO objectives.

The SEA concluded no significant effects. The plan was considered in-combination with other plans and programmes, and no in-combination effects were identified.

Alternatives

As detailed within the SEA Draft Environmental Report a variety of measures were explored that could meet the NAO, however none were deemed appropriate on technical grounds beyond a land use planning measure, and a noise insulation scheme which was the measure adopted. Land use planning measures are a function of the planning authority. ANCA requested the planning authority undertake a review of noise zoning measures, but this does not form part of the DRD. For this reason, only the proposal for a noise insulation scheme was taken forward.

Modelling and night-time data

Whilst some information was not received by ANCA, as identified in the Infrata Report (Appendix B to the DRD Report), it was considered that alternative information could be relied on to support ANCA's decision making. This includes, for example, the preparation

of an independent review of the airport's forecasts and analysis carried out by ANCA's technical consultants. Based on that analysis, ANCA is satisfied that the data relied on for the purposes of the SEA Draft Environmental Report for the DRD was adequate and robust.

Cumulative effects and Inter-relationships

Figure 2-2 of the SEA Environmental Report shows the interrelationships between different plans, rather than suggesting the plans are part of one-tiered programme.

The objectives set under the proposed amendments to the NAO and assessed under the SEA do not interact with the measures adopted under the DRD, other than the proposed amendments to the NAO influences the chosen measures to meet the objectives. The SEA for the proposed amendments to the NAO and DRD, respectively, concluded no likely significant effects, therefore there is no potential for cumulative effects or any requirement to assess the two plans cumulatively, since they are assessed separately.

The proposed amendments to the NAO and DRD were considered separately, each subject to their own SEA process as they are considered as independent 'plans' under the SEA guidance. Furthermore, the NAO is first set to outline the objectives to be achieved. The DRD measures therefore then follow and comprises the implementation of the measures required to meet the NAO objectives. They have therefore been considered separately for the purposes of SEA because they are able to influence environmental outcomes independently.

The Final SEA Environmental Report will include the Environmental Noise in Europe 2025 report and Zero Pollution Action Plan targets, making reference to these in the context of the relationship to other Plans and Environmental Protection Objectives.

EPA submission

The EPA submission is responded to in detail in the Final SEA Environmental Report.

Recommendation on issues raised on the DRD SEA

Following completion of the public consultation exercise, ANCA concluded that there were no changes to the DRD, in regard to the substance of the insulation scheme. However, there are changes to clarify aspects of the scheme and changes to align it with other insulation schemes in place at Dublin Airport, which are provided for in the RD Report.

Following review of these minor post-consultation clarifications, Logika Consultants confirm that the assessment findings and conclusions of the SEA remain unchanged.

4.5.2 Screening for Appropriate Assessment (AA) of the DRD

Natura 2000 sites are important ecological sites across the European Union that are given special protective status to ensure the long-term survival of Europe's most valuable and threatened species and habitats. They are comprised of areas known as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs).

A Stage 2 Appropriate Assessment is an evaluation of the potential effects of a plan or project on Natura 2000 sites, including whether it could adversely affect the 'integrity' of those sites.

The Screening Report for Appropriate Assessment for the DRD was available for public inspection on the ANCA website. Although public consultation is not required for the purposes of AA Screening, ANCA has considered submissions and observations in relation to same in advance of its final determination on whether or not AA is required for the DRD.

Issues raised in relation to Appropriate Assessment Screening of the DRD

Scope of the assessment, airport growth, operating times, flight numbers, flight paths, noise levels and emissions

Some submissions suggested that growth is included in the environmental assessment due to the use of the noise situation in 2023.

Submissions stated that operating times, flight numbers, flight paths, noise levels and emissions were not taken into consideration in the environmental assessment.

Biological & non-noise environmental pathways

Submissions referenced the biological pathway to impacts on the Natura 2000 sites, the impact of noise on bird song and referenced research from other European Airports.

Others stated that non-noise environmental pathways should be included i.e. PFAS/PFOS, ground water contamination, bird-strike, Natura 2000 catchments, greenhouse gas emissions.

Other responses stated that the AA screening recognises aircraft noise disturbance of birds as a plausible impact pathway and stated that the effects of aircraft noise on birds cannot be dismissed because the effects on humans indoors can be mitigated

Observations raised the issue of pathway assessment and that aircraft noise impacts on bird disturbance in the Natura 2000 sites as a receptor is a pathway requiring assessment.

Proposed insulation scheme mitigation

Some submissions suggested that the AA Screening Reports included mitigation in the form of the Insulation Scheme.

Noise impact on birds

Respondents raised an issue that noise is characterized as continuous for birds, while it is single event-based noise for impact on humans. Some of these submissions suggested that there is a weakness in ANCA's treatment of aircraft events as effectively "continuous noise".

Submissions raised the issue that the AA Screening recognises aircraft noise disturbance of birds as a plausible impact pathway and suggested that the effects of aircraft noise on birds cannot be dismissed because the effects on humans indoors can be mitigated.

Submissions stated that ANCA has already accepted that aircraft noise can disturb birds because ANCA adopted a precautionary 15 km Zone of Influence for aircraft noise expressly because of the potential for high and moderate noise effects upon birds

Data considered

Some submissions suggested that there is uncertainty due to discrepancy in modelling & missing data.

Natura 2000 Sites

Responses suggested that Ireland's Eye SPA was not assessed.

Red Kites

Submissions stated that the Impact on Red Kites has not been assessed.

In-combination effects

A number of responses raised the matter of cumulative effects and inter-relationships to other plans and projects were not taken into account, particularly the infrastructure application.

Others expressed opinions that the environmental assessments failed to assess in-combination effects.

Project splitting

Some submissions raised the issue that legislation does not allow project splitting and that the ecological consequences of the Infrastructure Application cannot be separated from the Regulatory Decision.

Stage 2 Appropriate Assessment

Others expressed a view that a full Stage 2 Appropriate Assessment is required.

ANCA response to issues raised in Appropriate Assessment screening for DRD

Scope of the assessment, airport growth, operating times, flight numbers, flight paths, noise levels and emissions

The DRD focusses on the mitigation measures to address any noise problems identified at Dublin Airport, with the measures being the implementation of a noise insulation scheme. The DRD is not concerned with the expansion of Dublin Airport in regard to the increase in passenger numbers from 32 MPPA to 40 MPPA, which is the subject of the Infrastructure Application (F23A/0781). Specifically, what the DRD is concerned with is set out in section 4.2, and as a result, assessment of passenger growth is not necessary.

The DRD is also not concerned with operating times, flight numbers, flight paths, noise levels or emissions. These were not the remit of the DRD, nor the AA screening that was undertaken in relation to the DRD.

Other matters relating to the AA Screening in relation to the DRD that were raised are discussed below under specific headings.

Biological & non-noise environmental pathways

The measures associated with the DRD related to a noise insulation scheme for residential properties. There is therefore no potential for biological or non-noise environmental pathways to the Natura 2000 Sites to be affected, in terms of noise generation, as DRD measures are in place to meet the objectives of the NAO and do not propose any changes which could increase or negatively affect existing noise levels.

Proposed insulation scheme mitigation

The DRD contained measures that provide noise insulation to residential homes, who are eligible, within defined contours. The insulation scheme therefore will only reducing internal noise in occupied buildings. The implementation of the insulation scheme will not result in changes to existing noise levels for better or worse at the Natura 2000 Sites. As stated below, the DRD do not change the noise situation in terms of noise generation at Dublin Airport.

The noise mitigation in the DRD is proposed mitigation for the impact on human health, not on the Natura 2000 sites.

Noise impact on birds

The DRD contained measures that provide noise insulation to residential homes. The measures are in place to ensure the objectives of the NAO are met, which are in place to ensure growth or other changes at Dublin Airport are managed in line with the objectives that have been set, and do not change the noise situation in terms of noise generation and will therefore not have an impact on birds in relation to noise.

Data considered

Whilst some information was not received by ANCA, it was considered that alternative information could be relied on to support ANCA's decision making. This includes, for example, the preparation of an independent review of the airport's forecasts and analysis carried out by ANCA's technical consultants. This had no implications for the RD SEA conclusions.

Natura 2000 Sites

Ireland's Eye SPA was considered within the AA Screening Report. As stated above, no pathways for impacts to the surrounding Natura 2000 Sites were identified, meaning no further assessment was required, i.e. a Stage 2 assessment. The assessment concluded that there were no likely significant effects.

Red Kites

Whilst Red Kite are an Annex 1 bird and protected under the Wildlife Act 1976, they are not qualifying species/feature of the ecological designated sites in the Zone of Influence.

In-combination effects

The plan was considered in-combination with other plans and programmes, and no in-combination effects were identified.

Project splitting

Project splitting concerns the artificial separation of a project for the purposes of avoiding an Environmental Impact Assessment or Appropriate Assessment. It has no application to the separate assessment of a plan and a project.

Stage 2 Appropriate Assessment

The RD is not directly connected with or necessary to the management of any Natura 2000 sites. Furthermore, no pathways for potential impacts were identified as a result of the implementation of the RD, and no likely significant effects were identified within the AA Screening Report.

4.6 Submissions outside of the process of public consultation

Submissions to the planning authority of Fingal County Council

The planning application related to this proposed Regulatory Decision was received by Fingal County Council on 15 December 2023. Submissions and observations were received by that authority between 15 December 2023 and 29 January 2024. As the planning authority requested additional information and the response received was deemed to be significant additional information, there was a second period for public submissions between 25 November 2024 and 08 January 2025. Any submission or observation made to the planning authority in relation to the Application within these two periods will be taken into account by the planning authority in making its decision on the Application.

The planning authority will incorporate a regulatory decision by ANCA into its decision to grant or refuse permission for the development the subject of the Application, having regard to all matters relating to the proper planning and sustainable development of the administrative area of Fingal County Council. The assessment of the Application by the planning authority on all relevant matters, provides for submissions on any matter associated with the Application, including aircraft noise. This process is separate to the noise assessment and making of a regulatory decision by ANCA.

To ensure that ANCA had a comprehensive understanding of all stakeholder issues as relevant to the process of aircraft noise regulation, the submissions made to the planning authority were also examined by ANCA. This review did not identify any issues over and above those made during the 14-week process of consultation on the DRD to the extent that affected the making of a regulatory decision through the process of aircraft noise regulation as defined by Section 34B of the Act of 2000.

Submissions received outside of the statutory period

The process of public and stakeholder consultation was undertaken through the Fingal County Council online consultation portal, by email, and by post/hand delivery.

A public notice in a national newspaper on 28 May 2026 together with all online information resources advised that submissions and observations could be made during a fourteen-week period between 28 May and 03 September 2026 and that late submissions would not be considered.

Several submissions and observations were submitted after the consultation closed on 03 September 2026. Although they were not included in the body of submissions considered in ANCA's process to amend the NAO, make a regulatory decision and associated report, and finalise the environmental assessment processes, they were

nonetheless reviewed by ANCA outside of the statutory process. ANCA is satisfied that as it happens, none of these submissions contained additional information that would have changed the outcome of the decisions taken post-consultation.

PART 5: NEXT STEPS

Next steps

Having considered all submissions and observations made in writing through the public consultation, ANCA will proceed to:

1) make the appropriate assessment determinations;
2) adopt the final SEA environmental report and SEA Statements, and issue, as soon as practicable after the adoption of the RD and the amended NAO, the SEA Statements setting out its findings on strategic environmental assessment, as required under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations (2004) (the 'SEA Regulations');
3) adopt the consultation report as its response to the issues raised in the public consultation and as a statement of the main reasons for ANCA's decision on the main issues arising from that public consultation
4) make and publish a copy of the RD and Report;
5) amend the NAO and publish a copy of the amended NAO and related report;
6) send the RD and relevant newspaper notice to the applicant, the airport authority, the planning authority, the elected members of FCC, the elected members of Dáil Éireann in whose constituencies the airport is located and the return addresses of the persons who have made submissions or observations to the Consultation;
7) submit the amended NAO, RD and related reports and associated SEA Statements to the environmental authorities as specified in the SEA Regulations
8) publish the final documents associated with this public consultation on the ANCA website at: https://www.fingal.ie/aircraftnoiseca/F23A0781.

How to appeal

For the purposes of appeal, An Coimisiún Pleanála is the appeals body in relation to a decision of the planning authority through Section 37 of the Act of 2000. Any person who made a submission or observation in writing in relation to the DRD, may on payment of the appropriate fee, at any time before the expiration of the appropriate period, appeal to An Coimisiún Pleanála against the decision of the planning authority on the Application containing the RD.

More information

More information on ANCA and the Aircraft Noise Regulation process can be found at www.fingal.ie/aircraftnoiseca.

END.

Appendix A

List of submissions and observations received on the proposed amendments to the NAO, Draft Regulatory Decision, Draft Regulatory Decision Report and associated environmental assessments

A. Barrett	A. Sprague	A.K.
Aaron Cregan	Abbie Grassick	Abigail McCaffrey
Adam Skrzydlewski	Adrian Kavanagh	Adrian Kielich
Adrienne Hughes (née McDonnell)	Aer Lingus	Agnieszka Makas
Ahmed Ghazy	Aidan Conaty	Aidan Killen
Aidan McPartlin	Aidan Mullin	Aideen Brownen
Aideen Rogers	Aine McKeown	Aine Ratcliffe
Aingeal Lawton	Airlines for America	Aisling Cashell
Aisling Gogarty	Aisling Menton	Ajani Tukumbana
Alan Shelley	Alan and Margaret Kelly	Alan Browne
Alan Fitzpatrick	Alan Griffin	Alan Kelly
Alan Lynch	Alan Walsh	Albert Rattigan
Alen Boxwell	Alex O'Brien	Alice Fox
Alicia Baird	Alison McCulloch	Alwyn Byrne
Amanda Byrne	Ambrose Jameson	Amy McNamera
Ana Barisnikova	Anand Kumar	Andre Baumann
Andrea Delisimunovic	Andrea Ryan	Andreas & Anne Walsh
Andrew Dunne	Andrew Selby	Angela Carthy
Angela Martin	Angela McGloin	Angela Smyth
Ann Byrne	Ann Carolan	Ann Goodwin
Ann Kelly	Ann McNelis	Anna Horvat
Anna Phelan	Anna Reidy	Annalisa Monticelli
Anne Cantwell	Anne Connolly	Anne Corrigan
Anne Dalton	Anne Magill	Anne Martin
Anne O'Sullivan	Anne O'Toole	Anne Yeates
AnneMarie Fenton	Annette Akinrinde	Annette Cashell
Annette Donlon	Annette Freaney	Annette Kelly
Annette McInerney	Anthony Brennan	Antoine Bervas
Antoinette Malone	Aoife Barrett	Aoife Brodigan and Edward Sheanon
Aoife Dunne	Aoife Mangan	Aoife Mcfadden
Aoife O'Grady	Aoife Whooley	Artem Dubinich
Ashling McNeill	Ata Sasmaz	Audrey Fagan
Audrey Ward	Aurelia Beuing	Barbara O'Neill
Ballyboughal Community Council	Barbara Capper	Barbara Brady
Barbara Walsh	Barry Gogarty	Barry Hall
Barry O'Flanagan	Bart Glover	Bartle Ratcliffe

Beata Pason	Ben and Rebecca Hemeryck	Ben Clancy
Ben Cosgrave	Bernadette Conaty	Bernadette Erraught
Bernadette Scully Laing	Bernadette Stenson	Bernard Lynch
Bernie Egan	Bernie Lawless	Billy Colgan
Breda Kearns	Brean Nocon	Breda McDonnell
Breda Murray	Breda Ratcliffe	Breffni Conaty
Brendan Burke	Brendan Gregan	Brendan Lennon
Brendan Murphy	Bria O'Farrell and family	Brian Kelly
Brian McManus	Brian Murphy	Brian Philips
Brian Ryan	Brid Cottell	Bridie Ryan
Brigid Jones	Bryan Beggan	Bryan Fields
Bryan Flanagan	Byrne (first name unknown)	C. Murphy
Caitlin Burke	Caitriona Hoey	Caitriona Ratcliffe
Colm Ratcliffe	Calum Haslam	Canice Fitzmorris
Caoimhe Maher	Caoimhe Ratcliffe	Caoimhe Redmond
Caoimhín Ó Ruairc	Carmel Moore	Carmel Mullins
Carol & David Smyth	Carol Levey	Carol Smyth
Caroline Brady	Caroline Madden	Caroline Molloy
Cathal Gammone	Cathal Gibbons	Catherine Arkins
Catherine Connolly	Catherine Mannix	Catherine McMahon
Catherine O'Brien	Catherine O'Shea	Catherine Ratcliffe
Cathy Hamilton	Catriona Hurley	Chantel Leach
Charles and Elizabeth McGrachan	Charlotte Jackson	Chris Gaffney
Christine Bates	Christine Gibson	Christine Mullen
Christopher Ratcliffe	Ciara Durham	Ciara O'Sullivan
Ciara O'Reilly	Ciarán Doyle	Ciarán Fahey
Ciaran McCreary	Ciaran O'Hare	Claire Bermingham
Claire Byrne	Claire Chauvet	Claire Erraught
Claire McCarville	Claire O'Sullivan	Claire Power
Claire Reidy	Claire Smith	Clare and Jim Gray
Clare Blaney	Clare Donellan	Clare Foran
Clare Grey	Clare Martin	Cliona Lawton
Cllr. Alan Tobin	Cllr. Brian McDonagh & Duncan Smith TD	Cllr. Conor Tormey
Cllr. Darragh Butler	Cllr. Ellen Troy	Cllr. Emer Toibin
Cllr. Eoghan Dockrell	Cllr. James Humphreys	Cllr. Joe Newman
Cllr. John Burtchaell & Ruth Coppinger TD	Cllr. John Smyth	Colette Dunne
Colin Quigley	Colin Sullivan	Collette Gleeson
Colm Allen	Colm Hogarty	Colm Ratcliffe
Con McMahon	Conor Boyle	Conor John Skerritt
Conor O'Reilly	Conor Pierce	Cristin O'Gorman
Cyril Vallin	D. Marshall	D. Sugrue

daa	Dan and Deirdre O'Gorman	Dan O'Gorman
Daniel Debtuch	Daniel McGowran	Danielle Mathews
Danny O'Neill	Darach Culligan	Daragh Donnelly
Darragh O' Neill	Darren Byrne	Darren Jack Kelly
Darren Maguire	Darren O'Rourke TD	Dave Peyton
David Doyle	David Doran	David Doyle
David Egan	David Fagan	David Farrell
David Flynn	David Fox	David Hanratty
David Kenny	David Latham Latham	David McKiernan
David Moriarty	David O'Connor	David Paver
David R.Kelly	David Reilly	Davide Casinelli
Dawid Wilinski	Dawn Downey	Dearbhla Foley
Declan Cleary	Declan Hannigan	Declan Redmond
Deirdre McNamara	Deirde, Ellaine and Claire Donnellan	Deirdre Fitzsimons
Deirdre Walsh	Denis Rooney	Denise O'Donohue
Denise Patterson	Denise Sheridan	Derek McGowan
Derek Hanlon	Derek Prendergast	Dermot Morris
Des Fitzgerald	Des Lawlor	Desmond Guckian
Diana Ojog	Diarmuid O'Grady	Diarmuid Slattery
Dolores McGuire	Dominic (surname unknown)	Donagh O'Gradaigh
Donal Nugent	Donal O’Brien	Donal Walsh
Donall O'Donaghue	Doreen Mooney	Dr. Benedict M. Glover
Dylan Cassidy	Dylan Kavanagh	E. Lee
Eamonn Kenna	Eamonn McGowran	ED
Eddie Cassidy	Edel Flood	Edward Donnelly
Eileen Coonagh	Eilis Conaty	Eithna Ratcliffe
Eithne Byrne	Eithne Uí Chinnéide	Elaine and Linus Kavanagh
Elaine Deasy	Elaine Roddy Carroll	Elaine Stanley
Elayne Deane	Elena Zlatova	Elizabeth Dixon
Elizabeth Ferris	Elizabeth Roche	Ella Jackson
Ellen Gibbons	Ellen Kavanagh	Emanuela De Florio
Emer Kelleher	Emma Carolan	Emma McArdle
Emmanuel Kirby	Emmett Currie	Environmental Protection Agency
Eoghan McGuirk	Eoghan McKenna	Eoin Dunne
Eoin Keary	Eoin O'Broin	Eoin O'Byrne
Eric Healy	Eric Murphy	Erika White
Esther Cassidy	Ethan (Surname Unknown)	Eva Cashell
F. Donlon	FedEx Express Europe	Fergal Hayes
Finbar Hall	Fiona Carty	Fiona Chalkley
Fiona Irwin	Fiona Leung	Fiona Moya
Fiona O'Grady	Fionnuala Gill	Frances Murphy
Francis Murphy	Francis Murray	Frank McGowan

Frank O'Hara	Frank Paul McGuire	Frank Waite
Fred O'Brien	Freight Transport Association Ireland	Fursey Duggan
Gabrielle Reidy	Gaia Beuing	Gareth O'Brien
Gareth Toolan	Garry (surname Unknown)	Gary Curtin
Gary Ellison	Gary McElroy	Gary McNamara
Gary O'Connell	Gavin Kane	Gavin O'Donnell
Gavin O'Toole	George Krawczyk	Georgia Walsh
Ger Abbey	Geraldine Loftus	Gerard Dougall
Gerard Dunne	Gerard Harris	Gerard O'Sullivan
Gerard O'Connor	Gerard O'Keeffe	Gerard Sheehan
Gergine Graneghon	Gerard and Eileen Coonagh	Gerry Fitzsimons
Gerry Sweeney	Gerry Treanor	Gillian Menton
Gillian O'Toole	Gillian Rice	Gillian Toole
Gillian Travers	Gisela Walsh	Gloria Walsh
Gordan Murphy	Gordon O'Brien	Grace Clarke
Graham Jackson	Grainne Bailey Farrell	Grainne Dollard
Grainne Keegan	Grainne McFadden	Grainne O'Reilly
Grainne Redmond	Gregory Hughes	Hannah O'Donoghue
Harry Gibson	Harry O'Donoghue	Harry Sprague
Heidi O'Donoghue	Helen Fagan	Helen Meyer
Helen Reidy	Helena Marshall	Helene Dooley
Henry McCaffrey	Hilary O'Broin	Hilary Shearman
Hilary Walsh	Hilary Walshe	Hilary O'Broin
Hillery Brosnan	Hugh Dwyer	Hugh Higham
Hugh McElroy	Hugh Synnott	I. Sprague
Ian Boyle	Ian Dowd	Ian McCormack
Ian Warren	IBEC	Imelda McGowran
International Air Transport Association	Iris O'Byrne	Ivan Taylor
J.P. Dixon	Jacinta Harris	Jack Quinn and Family
Jackie Keating	Jacquelin Mulry	Jacqueline Martin
James and Emma Linnane	James Cashman	James Harte
James Heary	James Hillen	James Isdale
James Lawless	James McKeown	James Morris
James O'Brien	James O'Dwyer	James Ratcliffe
James Scully	Jan Bosch	Jason Bollard
Jason Dixon	Jauna McKeown	Jean Beglan
Jen Hussey	Jennifer Hussey	Jennifer McCormack
Jiala Valay	Jim O'Rourke	Jim Ryan
Jim Wood	Jimmy Murphy	Joan Crowley
Joanne Coleman	Joanne O'Donnell	Joanne O'Sullivan
Joe and Bridie Ryan	Joe Brodie	Joe Cronin

Joe Duff	Joe Keenan	Joe McDonnell
Joe Ratcliffe	Joe Ryan	Joe Smith
Joey Long	Johanna Van Bunderen	John and Elizabeth Dixon
John Bermingham	John Boland	John Burke
John Chalkley	John Conama	John Cummins
John Dennehy	John Dillon	John Dixon
John Farrell	John Fay	John Gannon
John Harris	John Hunt	John Law
John Mangan	John McCarthy	John O'Byrne
John O'Sullivan	John Walsh	John Whyte
John Yeates	Jonathan Brogan	Jonathan McNally
Jonathan O'Meara	Jordan O'Neill	Joseph Dixon
Joseph Smith	Joseph Sweeney	Josephine Boland
Josephine Fay	Josephine Moloney	Joshua Harris
Joyce Egan	Joyce McHugh	Juan Matiias
Judith O'Brien	Julia Brady	Julia Mielcarek
Julie Flood	Julie Patton	Justine Le Guil
Kalpana Parakh	Karen Cullen	Karena O'Sullivan
Karl Cassidy	Kate Collins	Kate O'Donovan
Kate Rooney	Kathie Taylor	Kathy Gilroy
Kathy O'Farrell	Katie Harnett	Katrina Hanlon
Kay McGowran	Kayla Ryan	Kayleigh Myler
Keith Duffy	Keith Hanlon	Keith Kennedy
Ken Hughes	Ken O'Neill	Kevin Blount
Kevin Carr	Kevin Cheung	Kevin Cleary
Kevin Egan	Kevin Fenelly	Kevin Nelson
Kevin O'Donoghue	Kevin Ratcliffe	Kevin Walsh
Kevin Wilkie	Kieran Donlon	Kieran J.Timmins
Kieran Keavey	Kieran McGrath	Kilcoskan National School
Parents Association Kilcoskan National School	Kitty Dankwah Daly	Kolyn Byrne
Kyle Kavanagh	Lara Glover	Laura Barry
Laura Gannon	Laura Johnson	Laura Mulligan
Laura O'Sullivan	Laura Ryan	Laurence O'Toole
Lee Jones	Leona Cantwell	Lesley Riley
Liam Corish	Liam McMahon	Liam O'Connor
Liam O'Gradaigh	Liam Redmond	Lily Conaty
Linda Byrne	Linda Kavanagh	Linda Leonard
Linda McCullagh	Linda Pringle	Lisa Burke
Lisa Cope	Lisa Duffy	Liz Fennelly
Liz Redmond	Loreto O' Byrne	Loreto O'Byrne
Lorna Gallagher	Lorraine Clifford Lee (Senator)	Louise Chunnett

Louise Fitzgerald	Louise Gallagher	Louise Kelly
Lubica Mieresova	Lydia Stoyanov	M. Byrne
M. McMahon	M. Pletor	M. Sugrue
Madeleine McMahon	Maeve Corish	Magdalena Kielich
Magdalena Ryan	Mai Boyle	Máire Fay
Maire McDonald	Mairead Fitzsimons	Mairead O'Keeffe
Malachy MacCarthy	Manjeet Singh	Manoj Parameshwar
Manus Rogan	Marcin (surname unknown)	Marco Stoyanov
Marg Kelsch	Margaret (surname unknown)	Margaret Dowling
Margaret Godwin	Margaret Marlowe	Margaret Norris
Margaret O'Boyle	Margaret Quinn	Margie O'Rourke
Maria Browne	Maria Cojocariu	Maria Donnelly
Maria McArdle	Maria O'Reilly	Maria Size
Mariab Murphy	Marian (surname unknown)	Marian Farrell
Marie Brennan	Marie Gormley	Marie Hannon
Marie Harte	Marie Lowndes	Marie Manning
Marie McHale	Marie O'Brien	Marisa Cassidy
Marjan McCarthy	Marjorie O'Grady	Mark Beddis
Mark Connolly	Mark O'Reilly	Mark Prendergast
Martin and Claire Tracey	Martin Sheridan	Martin Walsh
Martina McGuirk	Mary and Jeffrey Breen	Mary Breen
Mary Deelan	Mary Dowling	Mary Doyle
Mary Feeney	Mary Gleeson	Mary Grogan
Mary Jo Walsh	Mary McKeown	Mary O'Connor
Mary Rattigan	Mary Ryan	Mary Sheridan
Mary Sweeney	Maryjo Walsh	Mathilde Robert
Matt Finn	Matt McMahon	Maura Doyle
Maurice and Marie O'Donnell	Meabh O'Gradaigh	Meaghan Molloy
Meath County Council	Megan Connolly	Melissa Egan
Michael and Susan Lillis	Michael Bosonnet	Michael Brady
Michael Delaney	Michael Joseph and Carol Valerie	Michael Keating
Michael McCaffrey	Michael McFadden	Michael Meagher
Michael O'Rourke	Michael O'Brien	Michael O'Connor
Michael Padden	Michael Queenan	Michael Shortall
Michael Stenson	Michal Gonciarz	Michael Doyle
Michèle Cunnane	Michelle Abbott	Michelle Queally
Michelle Ryan	Michelle Sullivan	Micko Hughes
Mike Delaney	Miriam Dillon	Monica Lee
Morah Ruttledge	N. Coleman	Nationwide Energy Consultants
Neil Carey	Neil Cashell	Neil McMahon
Neill Foran	Niall Farrelly	Niall Howard
Niall Smith	Niamh Broderick	Niamh Canavan

Niamh Cronin	Niamh Gaynor	Niamh Guiheen
Niamh Maher	Niamh Ratcliffe	Niamh Reilly
Nicholas Emmets	Nicholas Lowndes	Nick Egan
Nicky Ryan	Nicola Egan	Nigel Grassick
Noel Finn	Noel O'Byrne	Noel O'Byrne Jr
Noel O'Byrne Snr	Noeleen Kennedy	Noeleen McKeown
Noeleen Newman	Noelle Spring	Nora and Niall Campbell
Nora Dwyer	Nora Griffin	Noreen Wright
North Runway Technical Group	Nuala McDonnell	O. Mc Cormah
Oded Shaul	O'Keefe	Olga Karpenko
Olibhe Nì Bhraonáin	Olive Talbot	Olivia Sprague
Oonagh Taylor	Orga McShea	Orla Kindlon
Orla Mahon	Orla Roche	Orlagh Walsh
Orlaith Hickey	P.J. Kelly	P.J. Stone
Paddy Brangan	Paddy O'Reilly	Paddy Rogers
Padraic O'Meara	Padraig O'Reilly	Padraig Yeates
Parents Association Kilcoskan National School	Pat Coleman	Pat Gregan
Pat McFadden	Pat McKeown	Pat Murtagh
Pat O'Gorman	Pat Tierney	Patricia Albornoz
Patricia Graham	Patricia Herron	Patricia Lee
Patricia Mangan	Patricia McKeon	Patricia O'Toole Klinkenberg and Lo Klinkenberg
Patricia Ruttledge	Patrick Campbell	Patrick Donnelly
Patrick Gabbett	Patrick Kelly	Patrick Lynott
Patrick O'Reilly	Patrick Reilly	Paul Barry
Paul Bushby	Paul Campbell	Paul Coogan
Paul Corrigan	Paul Daly	Paul Donnelly
Paul Doolan	Paul Fagan	Paul Fay
Paul Gibson	Paul Herron	Paul Lynam
Paul Mangan	Paul Megan	Paul Mullan
Paul O'Byrne	Paul O'Meara	Paul Quinn
Paul Ryan	Paul Scheibe	Paul Ward
Paula Duffy	Paula Holland	Paula McMahon
Paula Molloy	Paule Nonnoe	Pauline Brickley
Pauline McGuinness	Pearse and Evelyn Sutton	Peggy Hoey
Peter Bodkin	Peter Brophy & Family	Peter Coyle
Peter Glover	Peter Goodman	Peter McGrath
Philip Byrne	Philip Hearty	Philip McCaffrey
Philip Meyler	Philip Murphy	Philomena Beary
Philomena O'Callaghan	Quinton Smith	Rachel A. Fahey
Rachel Cantwell	Rachel Kearns	Rachel McCaffrey
Raheem Abdul	Ramya Venugopal	Randol Taylor

Raphael Ardiff	Ratna Nelapati	Ray Gregan
Raymond Wright	Rebecca Ratcliffe	Rena Grant Grace
Renee Barnett	RGM Services	Richard Rooney
Richard Wall	Richard Walsh	Richie Walsh
Rivermeade Residents Association	Robert Beyer	Robert Kennedy
Robert Linnane	Robert O'Brien	Robert O'Donoghue TD
Roisin Sykes	Ronan Derby	Ronan Levey
Ronan O'Broin	Ronan Scott	Ronnie and Elaine Carroll
Rory Madigan	Ross Giffney	Ross McCann
Ruth Byrne	Ruth Smyth	Ryan Gibson
Ryanair	Sabrina Joyce	Saint Margarets The Ward
Sally Winters	Sandra Barry	Sandra Cullen
Sandra Martin and Alicia Kennedy	Sara Hani-Gavigan	Sarah Brennan
Sarah Jane McFadden	Sauyune Donnelly	Seamus and Ursula Horan
Seamus Foran	Seamus O'Neill	Seamus Stenson
Sean and Barbara Milton	Sean Costello	Sean Gregan
Sean Hani-Gavigan	Sean Keane	Sean McIvor
Sean McNally	Sean McSweeney	Sean O'Donnell
Sean O'Grady	Sean O'Shea	Serena Taylor
Shafqat Ayub	Sharon Beckett	Sharon Callan
Sharon O'Reilly	Shayne Brady	Sheelagh Morris
Sheelah Biggs	Sheena Duffy	Sile Dowd
Silviu Apostol	Simon Chuberre	Sinead Dunphy
Sinead O'Neill	Sinead Stevens	Siobhan Sheppard
Sonya Carroll	Sophie Goodman	St. John Baird
Aidan Gordon	Stephen Smyth	Stephen Dixon
Stephen McCullagh	Stephen Morris	Stephen Reidy
Steve Patterson	Steven and Paula Molloy	Steven Fleming
Steven Kelly	Steven Molloy	Stiofan Nutty
Stuart Mawhinney	Susan Craddock	Susan Hurley
Suzanne Byrne	Suzanne Mulvey	Suzanne Oglesby
Svetlana Arkhipova	Taisa Gwaj	Tanya Ratcliffe
Tara Diana	Tara Keely	Tatjana Imhof
Teresa Farrell	Teresa Kavanagh	Teresa Kinane
Teresa O'Dowd	Terry Maher	Terry Quinn Pilot Media
Tess Mulney	Theresa McGuinness	Therese Clarke
Therese Cleary	Thomas and Mary Clohessy	Thomas and Patricia Houlihan
Thomas Buckley	Thomas Keenan	Thomas Kelly
Thomas Martin	Tomás McCormack	Thressa McConnell
Tina Lundmark	Tom and Anne Winters	Tom Carroll
Tom Conaty	Tom McFadden	Tom Sampson
Tommy Conway	Tony Byrne	Tony Farrell

Tony Gray	Tony McManus	Trevor Ratcliffe
TS	Tudor Bolum	Umais Ahmed Arain
Unidentified Residents	Valerie Mc Ivor	Van (surname unknown)
Vanessa Storey	Varun Bhardwaj	Veronica Murphy
Vicky McGauley	Vicky Rannon	Vincent Clarke
Vincent O'Donoghue	Vivienne Brownen	Volodymyr Kharytonov
Vytautas Pocius	Wendy O'Toole	Wibke Sinagoga
William Dempsey	William Kennedy	Yvonne Ardiff
Yvonne Kenna	Yvonne McCartney	Yvonne Walshe



An tÚdarás Inniúil um Thorann Aerárthaí

Aircraft Noise Competent Authority