S. 37

File With _____

SECTION 131 FORM

Appeal NO:_ABP– 314485-22 ☐

Defer Re O/H

TO:SEO

Having considered the contents of the ~~submission dated/~~ Observation received 3/10/22 from Teresa O'Dowd. I recommend that section 131 of the Planning and Development Act, 2000 be/not be invoked at this stage for the following reason(s):. No new issues raised

E.O.: _____ **Date:** 14/10/22

To EO:_____

Section 131 not to be invoked at this stage. ☐

Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.:_____ **Date:**_____

S.A.O:_____ **Date:**_____

M _____

Please prepare BP _____ **- Section 131 notice enclosing a copy of the attached submission**

to: _____ **Task No:** _____

Allow 2/3/4weeks – BP_____

EO: _____ **Date:** _____

AA: _____ **Date:** _____

S. 37

File With _____

CORRESPONDENCE FORM

Appeal No: ABP_____

M _____

Please treat correspondence received on _____ **as follows:**

1. Update database with new agent for Applicant/Appellant _____	
2. Acknowledge with BP _____ 3. Keep copy of Board's Letter ☐	**1. RETURN TO SENDER with BP**_____ 2. Keep Envelope: ☐ 3. Keep Copy of Board's letter ☐

Amendments/Comments

4. Attach to file (a) R/S ☐ (d) Screening ☐ (b) GIS Processing ☐ (e) Inspectorate ☐ (c) Processing ☐	**RETURN TO EO** ☐

	Plans Date Stamped ☐ Date Stamped Filled in ☐
EO:	**AA:**
Date:	**Date:**

Validation Checklist

Lodgement Number : **LDG-057718-22**
Case Number: **ABP-314485-22**
Customer: **Teresa O'Dowd**
Lodgement Date: **03/10/2022 13:04:00**
Validation Officer: **Garry Dorgan**
PA Name: **Fingal County Council**
PA Reg Ref: **F20A/0668**
Case Type: **Normal Planning Appeal PDA2000**
Lodgement Type: **Observation / Submission**

An Bord Pleanála

Validation Checklist	Value
Confirm Classification	Confirmed - Correct
Confirm ABP Case Link	Confirmed-Correct
Fee/Payment	Valid – Correct
Name and Address available	Yes
Agent Name and Address available (if engaged)	Not Applicable
Subject Matter available	Yes
Grounds	Yes
Sufficient Fee Received	Yes
Received On time	Yes
Eligible to make lodgement	Yes
Completeness Check of Documentation	Yes

BP40 to issue ✓

PB
5/10/22

Run at: 04/10/2022 12:32

Run by: Garry Dorgan

Lodgement Cover Sheet - LDG-057718-22

314485

An Bord Pleanála

Details

Lodgement Date	03/10/2022
Customer	Teresa O'Dowd
Lodgement Channel	In Person
Lodgement by Agent	No
Agent Name	
Correspondence Primarily Sent to	
Registered Post Reference	

Lodgement ID	LDG-057718-22
Map ID	
Created By	Gillian Brogan
Physical Items included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	

Categorisation

Lodgement Type	Observation / Submission
Section	Processing

PA Name	Fingal County Council
Case Type (3rd Level Category)	

Fee and Payments

Specified Body	No
Oral Hearing	No
Fee Calculation Method	System
Currency	Euro
Fee Value	0.00
Refund Amount	0.00

Observation/Objection Allowed?	
Payment	PMT-044924-22
Related Payment Details Record	PD-044816-22

Decision : 5/9/22
L/D : 3/10/22.

Observation

Run at: 03/10/2022 13:06

Run by: Gillian Brogan

PA Case Number	
PA Decision Date	
County	
Development Type	
Development Address	
Appellant	
Supporting Argument	

Development Description	
Applicant	
Additional Supporting Items	

Run at: 03/10/2022 13:06

Run by: Gillian Brogan

An Bord Pleanála

Observation on a Planning Appeal: Form

BORD PLEANÁLA
LDG- 057718-22
ABP-
03 OCT 2022
Fee: € 50 Type: Card
Time: 12:59 By: hand

Your details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

Your full details:

(a) Name

~~Click or tap here to enter text.~~
Teresa O' Dowd

(b) Address

~~Click or tap here to enter text.~~
Kilcoskun, The Ward,
Co. Dublin

Agent's details

2. Agent's details

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Not applicable

(b) Agent's address

Click or tap here to enter text.

Postal address for letters

3. During the appeal process we will post information and items to you **or** to your agent. For this observation, who should we write to? (Please tick ✓ one box only.)

You (the observer) at the address in Part 1	✓	**The agent at the address in Part 2**	☐

Details about the proposed development

4. Please provide details about the appeal you wish to make an observation on. If you want, you can include a copy of the planning authority's decision as the observation details.

(a) Planning authority

(for example: Ballytown City Council)

Fingal County Council

(b) An Bord Pleanála appeal case number (if available)

(for example: ABP-300000-19)

PL06F.314485

(c) Planning authority register reference number

(for example: 18/0123)

F20A/0668

(d) Location of proposed development

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Dublin Airport, Co Dublin

Observation details

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

We support the current appeals lodged with An Bord Pleanála and wish to add the following comments listed below.

I request that An Bord Pleanála provide their findings to the following questions as part of their assessment of the application,

1. Compare the applicant's proposal for additional night flights and quota system to other European and UK airports where movement limits apply in addition to quota systems. This is the newest runway in the world, and it should be operated to the highest standards of noise mitigation within the Balanced Approach.
2. Examine how the applicant derived the Noise Quota System proposed. It would appear that the quota count provided was simply selected to allow daa unrestricted movements.
3. The adverse health impacts of additional night-time noise should be thoroughly investigated. The applicant's EIAR has a very limited view of health impacts and fails to consider the impact of awakenings from noise events at night.
4. Divergent flight paths are proposed but these are dramatically different to the flight paths being implemented at Dublin Airport since the North Runway opened. How can any of the applicant's forecasts be trusted if they cannot determine the flight paths to use on their own runway? An Bord Pleanála should investigate the impact of changing the flight paths on the environment.
5. Is it plausible that an airport can simply change the flight paths and therefore impact on an entirely different area without requiring the environmental impacts to be reassessed for those areas in advance?
6. The night-time noise insulation scheme proposed by the applicant is not a fully compensated noise insulation scheme and instead is a grant. This is a lesser scheme when compared to the daytime insulation scheme already agreed with Fingal. There are no other examples of developers describing that mitigation is needed but then expecting the sensitive location to pay for the mitigation. An Bord Pleanála should provide a detailed critical assessment of this proposal as it is contrary to the polluter pays principal.
7. The qualification criteria for night noise insulation should be compared to progressive European Airports. No mention has been made in the document of how the proposed scheme ranks compared to other locations. This is the

newest runway in the world, and it should be operated to the highest standards of noise mitigation within the Balanced Approach. Noise insulation is a key element of the Balanced Approach that should be maximised if an airport wishes to avoid restrictions of operations as daa do in this case.

8. For those residents most affected by noise, a larger relocation scheme should be made available. Monitoring has shown that noise cannot be reduced to safe levels with full noise insulation for those most impacted by the flight paths. These residents should be offered a relocation scheme. A scheme could be devised where the passenger charges are increased by a nominal amount along the lines of the Polluter pays principle. If airline passengers are causing unhealthy noise levels, then they should pay a small fee for this pollution and facilitate the relocation of residents to safe areas. The monies raised can be used to purchase a land bank such as Thornton Hall for the residents to move to.

In conclusion I request that permission is refused for this relevant action application on the basis that it will seriously impact on the health of communities closest to the airport and adequate mitigation has not been provided by the applicant.

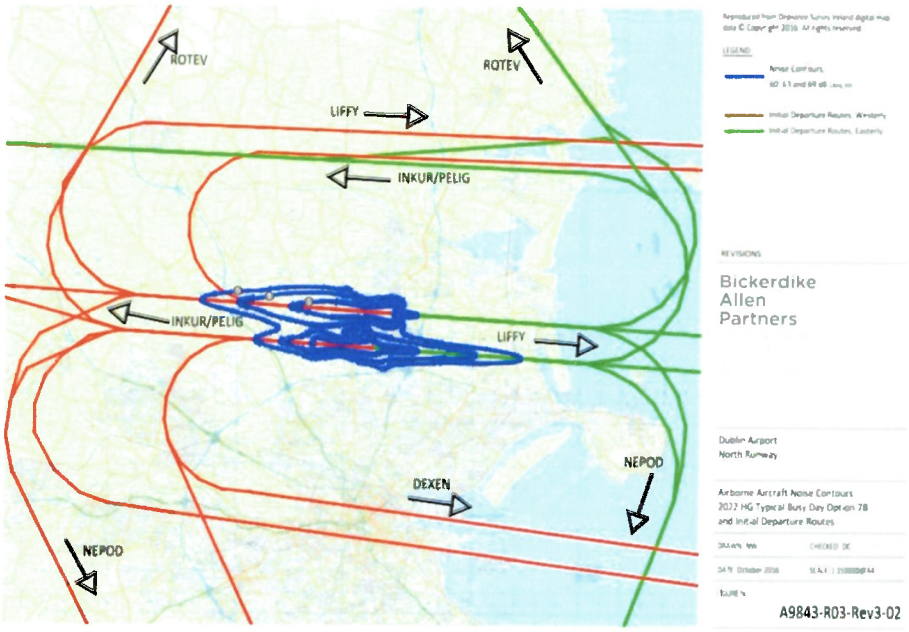
I also support the request for an Oral Hearing.

Further background information to many of the questions raised above can be found in the following sections.

Non-adherence to An Bord Pleanála planning conditions of 2007

- Continuing to fly over 65 aircraft at night since the North Runway opened on August 24th, contravening Condition 5
    - *"On completion of construction of the runway hereby permitted, the average number of night time aircraft movements at the airport shall not exceed 65/night (between 2300 hours and 0700 hours) when measured over the 92 day modelling period as set out in the reply to the further information request received by An Bord Pleanála on the 5th day of March, 2007.*

      ***Reason**: To control the frequency of night flights at the airport so as to protect residential amenity having regard to the information submitted concerning future night time use of the existing parallel runway".*
- Flying divergent flight paths on the North Runway for Westerly operations contravening the EIS of 2007
- Divergent flight paths currently in operation do not align with EIAR for this current planning application that is under appeal
- 30-degree divergence was not proposed in the 2016 consultation
- Condition 3 of planning does not allow for dual runway departures under Option 7b
- Flight paths used in Insulation Scheme approved by Fingal County Council in 2016, based on 2007 planning permission, show straight out operations



Observation on a Planning Appeal:

- Departures on North Runway on August 25-27th and all dates of westerly departures since opening are showing divergent routes contravening the planning permission from 2007

Lack of Public Consultation

- Current application is significantly different from previous consultation in 2016
  - No Noise Quota in 2016
  - No insulation scheme for night-time period in 2016
  - No map provided to show what dwellings qualify for insulation
  - No mention of mixed-mode (simultaneous) runway use at peak times in 2016
  - Future forecasts beyond 32m were part of the consultation in 2016 and not considered now
  - No mention in 2016 that 2018/2019 would be used as the baseline year
  - No modelling in 2016 to take account of noise levels down to 50 dB Lden and 40 dB Lnight
  - No consideration of population changes since 2016
- Legislation since last Public Consultation in 2016
  - European Communities (Environmental Noise) Regulations 2018, S.I. No. 549/2018

    - WHO Guidelines 2018
    - Aircraft Noise (Dublin Airport) Regulation Bill 2018
    - European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, S.I. 296/2018
- Public Consultation is a requirement under Objective DA09 in the Dublin Airport LAP
    - Objective DA09
        - "Ensure that aircraft-related development and operation procedures proposed and existing at the Airport consider all measures necessary to mitigate against the potential negative impact of noise from aircraft operations (such as engine testing, taxiing, taking off and landing), on existing established residential communities, while not placing unreasonable, but allowing reasonable restrictions on airport development to prevent detrimental effects on local communities, taking into account EU Regulation 598/2014 (or any future EU regulation applicable) having regard to the 'Balanced Approach' and the involvement of communities in ensuring a collaborative approach to mitigating against noise pollution."
- Public Consultation is also a requirement under EIAR Guidelines
- The daa refused consultation with the CLG group to explain the additional information in the revised application.
- ANCA never made contact with the CLG group.
- No leaflet drops by ANCA to the residents most affected. Only 3 online webinars where no inter-action was facilitated except by typing questions.
- No community meetings held even after the removal of Covid restrictions.

Climate Change

- Application did not take account of emissions with passenger numbers beyond 32m
- Application applied out of date National Emissions Inventory data

- Difference between the Proposed and Permitted scenarios in 2040 with the passenger cap removed will lead to
  - an 8.5 - 10% increase in Green House Gas (GHG emissions)
  - 0.95% of National Emissions Inventory
  - 6.67% of Future Transport Emissions Inventory
- Did not take account of non-CO2 effects

Baseline year for NAO

- 2019 should not be used as a baseline reference year
  - 754k people exposed to >45 dB Lden
  - 34k people exposed to >55 dB Lden
  - 344.9k people exposed to >40 dB Lnight
  - 13.8k people exposed to >50 dB Lnight
- The selection of 2019 as a baseline for noise is contrary to target 2 of the EU Action Plan "Towards zero pollution for air, water and soil" adopted by the European Commission on 12th of May 2021, as the targets are not set using 2017 as the baseline.
- The selection of 2019 as a baseline is contrary to ANCA's own SEA document used to screen the project.
- 2019 was the worst year on record for noise levels
- 2018 was the worst year on record for noise levels where the 32m passenger cap was not breached.
- Data from the 3 Rounds of the Environmental Noise Directive (END) show an escalating noise problem since 2006.
- ANCA's document on the determination of a noise problem states that "*Over the period 2006 to 2019 the population reported to be exposed to night-time noise above 50dB Lnight had increased by a multiple of* ***seven***".
- From 2016 to 2019 the size of the daytime noise 45dB Lden contour grew from 370km2 to 745km2
- From 2016 to 2019 the size of the night-time noise 40dB Lnight contour grew from 212km2 to 328km2.

Noise Monitor data

- No significant difference between readings from the quieter 737 8 Max and older aircraft
- Aircraft replacements have not reduced noise in the past so why will it do so now with the increase in movements?
    - In 2003 46% of aircraft were Chapter 4 and 14, 83% in 2008 and 90% in 2017.
- In 2016 the 45dB Lden contour was 370km2. In 2019 it grew to 745km2.
    - This is a doubling of the size of the 45dB Lden contour in just 3 years.
- In 2016 the 40dB Lnight contour was 212km2. In 2019 it grew to 328km2.
    - This is a 50% increase in the size of the 40dB Lnight contour in just 3 years.

Daa's passenger forecasts

- Daa's own forecasts show that passengers can grow to 42m whilst keeping nighttime restrictions
- The daa have failed in their application to justify the need for dual departures between 06:00–08:00. The large populations of Fingal and Dublin West will be exposed to serious adverse night-time health effects for just **2 extra flights** in the period 06:00–08:00 and **4 extra flights** in the period 22:00–24:00, when comparing 2025 Proposed with 2025 Permitted.
- Mott MacDonald report shows that the daa can achieve **42m** Passengers in 2040 **whilst keeping restrictions**, providing proof that the objectives of the National Aviation Policy (2015) can be achieved whilst protecting the health of residents.
- Retaining the operating restrictions does not hinder growth.
- The daa and Fingal County Council in the Dublin Airport Noise Action Plan claim that aircraft types have changed in Dublin Airport between 2003 to 2017 resulting in quieter aircraft. However, noise exposure levels grew exponentially in line with movement increases.
- Noise levels submitted by the daa to the St Margarets The Ward group for various noise emissions for specific aircraft indicate that there is very little difference in the actual measured noise level between the older and newer

aircraft. Therefore, the assertions claimed regarding fleet replacements is totally flawed

- The daa's figures for the number of movements lost up to 2025 are grossly overestimated by not fully utilizing the available 65 movements limit.
- daa's forecasts show ample capacity between 07:00-23:00 to cater for increased passenger numbers.
- In their Tap 2028 Prospectus the daa outline risks related to the North Runway. It discusses the two planning conditions, namely condition 3(c) and 5. It states that the current estimate of a decision from Fingal County Council is quarter 3, 2022. And if the decision is appealed, a decision from the appeals board is anticipated in quarter 1, 2024. Therefore, the loss of passenger numbers presented in the Mott MacDonald report are unrealistic as the planning conditions will not be amended before then. The Mott MacDonald figures are theoretical and inaccurate.
- As a result, the cost benefit analysis performed by the daa based on losses accrued up to 2025 are purely theoretical and always going to occur. It's a fictional cost benefit analysis.
- 2025 is a premature timeframe used in this planning application. The sole intention of this application is to remove the planning conditions before applying for an increase in passenger numbers.

Insulation scheme

- Insulation installed in houses already insulated by the daa fails to mitigate against adverse noise levels as outlined in the report from the MLM Group.
- Insulation Scheme proposed by ANCA **insulates less houses** than in the planning application by the daa.
- ANCA did not use the criteria 2 specification from the daa in their cost-effectiveness analysis. They only used criteria 1. The daa included all dwellings >55dB Lnight in 2025 for criteria 1 and all dwellings >50dB Lnight with a 9dB increase in 2022 Proposed compared with 2025 Permitted for criteria 2.

- Insulation Scheme only applies to the cohort deemed '*very significantly*' affected. No mitigation for '*moderately*' or '*significantly*' affected dwellings.
- ANCA and the daa are proposing noise insulation as a mitigation measure to night-time noise increases within the St Margarets The Ward communities. This is contrary to Fingal County Council's advice within their own Development Plan, and testing carried out within the St Margarets The Ward area on housing that has already been insulated by the daa recently indicates the guidance referred to by Fingal County Council and the WHO cannot be achieved and will cause serious health issues of those affected by the proposed increase in night time noise.
- ProPG and WHO NNG Guidelines state an internal noise level of no more than 10-15 events > 45dB LAmax.
  - Based on N60 contours, 18,959 dwellings >= 10 events and 5,282 dwellings >=25 events for 2025 Proposed scenario. Mitigation for these dwellings is not taken into account. The cost-effectiveness analysis does not consider these large number of dwellings and so the application of the Balanced Approach is flawed.
  - Conflicts with Fingal Development Plan as not all houses in Noise Zone B are being offered insulation,
  - RFI #93 states that over-heating was not taken into account for insulation purposes. The response also does not take into account LAmax values as specified in the ProPG Guidelines and in BS8233:2014 section 7.7.2 note 4.
  - No consultation with people potentially affected and requiring insulation.
  - No medical expertise used in the analysis to determine the criteria for insulation.

Population and Human Health

- Population and Human Health chapter in the EIAR uses the incorrect HSD values for 2025 Proposed, therefore grossly underestimating the health effects of the Proposed scenario.

- 79,405 people will be Highly Annoyed and 37,080 will be Highly Sleep Disturbed in 2025.
- The Health Summary conclusion of Potential Residual Effects were negative (-) for Air Quality, Noise and Vibration, and Neighbourhood Amenity for 2025.
- Conclusion from report and presentation from Professor Münzel, leading Cardiologist and noise expert, is that all night-time flights should be banned in order to protect health.
- Submission from HSE Environmental Health to Fingal County Council states that all efforts should be made to minimize the number of people subjected to the adverse health effects of aircraft noise by reducing aircraft noise levels to below the WHO safe limits of 45dB Lden and 40dB Lnight.

Cost effectiveness analysis

- The reports on cost effectiveness submitted by the daa exclude quantification of costs associated with the adverse health effects inflicted on residents. This item was specifically requested by ANCA and was not provided by the daa. Costs associated with the adverse health effects inflicted on residents were evaluated, indicating that the total yearly cost based on the 2019 figures is a staggering **€600** million euro.
- The cost effectiveness analysis (CEA) submitted by Ricondo does not meet the requirements of EU598/2014 as it does not take into account of the current flight restrictions in place at Dublin Airport. The report therefore is misleading and inaccurate.
- The cost effectiveness analysis as submitted by Ricondo does not take into account the costs associated with Carbon Emissions nor does it indicate the costs in meeting Ireland's requirements under the Climate Action and Low Carbon (Amendment) Act 2021 for the proposed revision to the current restrictions.
- The EIAR submitted does not meet the requirements set out in the EPA guidance as it does not take into account the foreseeable and planned increase in passenger numbers above 32 million passengers and is considered 'project splitting'.

- In section 9.1 of the DRD concerning the CEA, ANCA state the use of the number of people HSD and exposed to a noise level > 55dB Lnight. Day time should not be excluded in this analysis. ANCA should look at the full noise picture and not just the night-time subset. In the Oral Hearing of 2007, Mr. Rupert Thornely-Taylor commented on the interaction of daytime and night-time movements in his report. Therefore, ANCA has erred by not including the HA figures and population > 65dB Lden as per the NAO.

2025 Proposed scenario

- The revised noise statistics for 2025 Proposed versus the original 2025 Relevant Action reveal that the daa predictions are worse now with the revised EIAR than the original EIAR in December 2020. The differences and reasons for these changes in noise levels are not explained by the daa or ANCA.
- Population >40dB Lnight increases from 174k to 268k; the number highly sleep disturbed increases from 24.4k to 37k; the area of the 40dB Lnight contour increases from 302 to 311.5km2. No explanations provided.
- The number of people forecast to be highly annoyed in 2025 Proposed is **79,405** and highly sleep disturbed is **37,080**.
- The number of people forecast to be at least significantly adversely affected in 2025 Proposed compared to 2025 Permitted is **11,494**.
- The number of people forecast to suffer '**significant**' adverse residual effects after mitigation in 2025 is **10,560**.
- The Proposed scenario (P02) does not meet the NAO when taking population growth into account
- Scenario P11 shows less night-time impact than P02 and has lower number of HSD and HA

Appropriate Assessment

- No AA for entire North Runway development

- The North Runway was granted permission under planning application F04A/1755, appealed to ABP under PL06F.217429 and planning extension under F04A/1755/E1.
- The judgment in the Friends of the Irish Environment V An Bord Pleanála 2018 No.734 J.R. and Court of Justice Judgment C 254/19 which found that an extension to a permission was a project as defined under the EIA Directive and that definition was applicable to the Habitats Directive.

Noise Quota System

- ANCA state in their report 'DRD Report 11 November 2021.pdf', that the Noise Quota Count System proposed "**does not inhibit the ability of Dublin Airport to meet its forecasts for passenger and ATM growth in the future**".
- In the Cost Effectiveness Methodology and Results report, section 1.6.2.2 states that: *"The Applicant's modelling shows that the annual night quota count (i.e. over the period 23:00 to 06:59) will be highest in 2025, at 15,892.* ***This suggests that the 8-hour alternative noise quota limit of 16,260 as suggested by ANCA can be met without imposing any restrictions on how an airline may wish to operate*** *from the airport subject to more restrictive restrictions on aircraft QC from 2030 onwards."*
- The Cost Effectiveness Methodology and Results report also shows that the NQS has no impact on HSD and night time noise priority figures.
- The proposed Quota system is an incomplete interpretation of that operated in the London airports. The London airports operate a Noise Quota System together with a movement limit. If the Dublin approach is based upon the London Stansted approach, then it should also include a movement limit.
- The use of a quota system based on EPNL fails to account for noise events. A movement limit in parallel with the noise quota would go some way to address this issue.
- If there is no movement limit, any aircraft movement with a quota count value of zero would in effect be unlimited, despite the fact that it is a noise generating movement. The total of 16,260 QC points far exceeds the totals in Gatwick, Heathrow, and Stansted. It should be reduced significantly. A reduction in this

limit would go some way in to meet that stated objective of limiting and reducing the long-term adverse effects of aircraft noise on health and quality of life.

- The total of 16,260 was based on a goal of reducing the average fleet noise per movement. This does not necessarily lead to a decrease in overall noise levels. For 2022, 2023 and 2025, the average fleet noise per movement decreases, but the overall QC points increase each year. A more appropriate approach would be to deliver a reduction of QC instead.
- A target QC of 14,000 in parallel with a movement limit would represent a more progressive approach. These should be considered minimal targets. The QC target of 14,000 is based on a slight improvement of 2018 data. An appropriate movement limit would also need to be determined. By analyzing the average relationship between the Movement/Noise Quota Limits described in the London airports, a movement limit of 21,000 would appear in line with international practice. Similar to the London schemes, these limits could be revised to account for summer/winter variation.
- The limits are based on 2018 data, as 2018 is the year identified by the daa in the development of the target QC/ATM. However, the data suggest the limits would also be applicable to 2017, which might be more appropriate to set as a pseudo baseline year against which improvements are assessed. This would align with the timing of EU Directive 2002/49/EC as well the European Commission's 'Towards Zero Pollution for Air, Water and Soil' Action Plan.

Submissions from HSE

- The net effect of the revised EIAR is a worsening of the health impacts outlined by the HSE in their original submission to the Planning Authority.
- A 17.2% increase in the number of people highly annoyed and an increase of 51.6% in people highly sleep disturbed.
- The residual effects of the 2025 Proposed scenario (without restrictions) compared with the 2025 Permitted scenario (with restrictions) are a net significant adverse effect for 10474 people in terms of the Lnight metric.
- ANCA did not take into account the submissions to the Planning Authority and thus excluded the HSE's submission.

- No mention of the HSE's submission to ANCA in their consultation report
- The HSE concludes that: "*All efforts should be made by the DAA to ensure as many people as possible are protected from the adverse health effects associated with aircraft noise as outlined above in this report. This must include reducing aircraft noise levels to below 45 dB Lden, and for night noise exposure to below 40 dB Lnight*", and

  "*The EHS is of the opinion that The World Health Organisation's Environmental Noise Guidelines of 45 dB Lden and 40 dB Lnight should have been used for ground noise assessments*", and

  "*The Conditions 3(d) and 5 were put in place to protect public health so if the planning authority are going to increase the hours of operation they must ensure all who are significantly impacted have the opportunity of mitigation*".

  .

Conflict of Interest

- Members of the consortium of noise consultants acting on behalf of ANCA have also worked on projects for Fingal County Council including the technical reviews of the noise insulation schemes put forward by daa in their submissions to Fingal to get North Running planning conditions discharged.
- Conflict of Interest identified to the Department of Transport by Fingal's CEO when Fingal was being identified as the Competent Authority
- ANCA delayed their assessment of the noise situation until the daa lodged their planning permission. It should have been conducted as soon as they were incorporated.
- No dispute resolution catered for and ANCA are failing to assess the noise situation for individuals under section 21 of the Aircraft Noise Act.

Supporting materials

6. If you wish, you can include supporting materials with your observation. Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

Fee

7. You **must** make sure that the correct fee is included with your observation. You can find out the correct fee to include in our Fees and Charges Guide on our website.

This document has been awarded a Plain English mark by NALA.

Last updated: April 2019.

Plain English
Approved by NALA