

File With \_\_\_\_\_

## SECTION 131 FORM

Appeal NO: ABP-314485-22

Defer Re O/H

☐

TO:SEO

Having considered the contents of the submission received 17/10/22 fromDAA I recommend that section 131 of the Planning and Development Act, 2000be/not be invoked at this stage for the following reason(s): No new issues raisedE.O.: Date: 19/10/22

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: \_\_\_\_\_

# CORRESPONDENCE FORM

File With

Sullivan

Appeal No: ABP-314485-22

M s McCormack

Please treat correspondence received on 17/10/22 as follows:

- |   |   |
|---|---|
| <p>1. Update database with new agent for Applicant/Appellant _____</p> <p>2. Acknowledge with BP <u>20</u></p> <p>3. Keep copy of Board's Letter <input type="checkbox"/></p> | <p>1. RETURN TO SENDER with BP _____</p> <p>2. Keep Envelope: <input type="checkbox"/></p> <p>3. Keep Copy of Board's letter <input type="checkbox"/></p> |
|---|---|

## Amendments/Comments

DAA response to Angela Lawton appeal

## 4. Attach to file

- |   |   |
|---|---|
| (a) R/S <input type="checkbox"/>            | (d) Screening <input type="checkbox"/>    |
| (b) GIS Processing <input type="checkbox"/> | (e) Inspectorate <input type="checkbox"/> |
| (c) Processing <input type="checkbox"/>     |   |

RETURN TO EO ☒

*Carry*

Plans Date Stamped ☐  
Date Stamped Filled in ☐

EO:

AA:

Date:

Date:

*Carry*  
18/10/22

*P. Buckley*  
18/10/22

**From:** Orla O'Callaghan <orlaoc@tpa.ie>  
**Sent:** Monday 17 October 2022 13:06  
**To:** Appeals2; Bord  
**Subject:** First Party Response to Third Party Appeal - ABP Ref. PL06F.314485.  
**Attachments:** First Party Response to Third Party Appeal ABP Ref. PL06F.314485 \_Angela Lawton\_FINAL (002).pdf

Good Afternoon,

On behalf of daa plc, please find attached First Party Response to a Third-Party Appeal by Angela Lawton against a Notification of a Decision to Grant Permission by Fingal County Council (FCC) dated 8th August 2022 (Fingal County Council Reg. Ref. F20A/0668 /ABP Ref. PL06F.314485).

Can you please confirm receipt of this First Party Response to the Appeal?

Regards,

Orla O'Callaghan  
Senior Planner

**Tom Phillips + Associates**  
Town Planning Consultants



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The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

17, October 2022  
[By email - appeals@pleanala.ie]

Dear Sir/Madam,

**Re: Proposed relevant action (S.34C of P&D Acts) to amend/replace operating restrictions set out in conditions no. 3(d) & no. 5 of the North Runway Planning Permission (ABP Ref. No.: PL06F.217429) as well as proposing new noise mitigation measures at Dublin Airport, Co. Dublin**

**First Party Response to Third Party Appeal**  
**ABP Ref. PL06F.314485; Fingal County Council Reg. Ref. F20A/0668.**

## 1.0 Introduction

daa plc have retained Tom Phillips + Associates<sup>1</sup> to prepare this First Party Response to a Third-Party Appeal by Angela Lawton against a Notification of a Decision to Grant Permission by Fingal County Council (FCC) dated 8<sup>th</sup> August 2022.

## 2.0 Executive Summary

The appeal submitted by Angela Lawton relates to a notice of decision by FCC to grant an application made on behalf of daa plc for a proposed development comprising the taking of a 'relevant action' only within the meaning of Section 34C of the Planning and Development Act 2000, as amended, at Dublin Airport, Co. Dublin. The proposed relevant action is to amend/replace operating restrictions set out in conditions no. 3(d) & no. 5 of the North Runway Planning Permission (ABP Ref. No.: PL06F.217429) as well as proposing new noise mitigation measures at Dublin Airport, Co. Dublin.

It is noted that some issues raised in this appeal are addressed in our client's First Party Response to a Third-Party appeal submitted by Saint Margaret's The Ward Residents Group (SMTWR). As such, we do not intend to respond to overlapping issues raised within this appeal. Notwithstanding the aforementioned, we enclose a response to independent issues raised by Angela Lawton in her appeal.

<sup>1</sup> 80 Harcourt Street, Dublin 2, D02 F449.



### 3.0 Appeal Context

This First Party Response on behalf of the applicant relates to an appeal by Angela Lawton against planning application FCC Reg. Ref. F20A/0668. FCC issued a notification to grant permission for the proposed application on the 8<sup>th</sup> August 2022 with 5 conditions attached.

The main grounds of the Appeal by Angela Lawton are as follows:

- The Appellant queries the cost benefit analysis of societal costs, climate change costs, and airport communities health costs versus daa costs.
- The Appellant states that the annual noise quota of 16,260 between 23:00 and 06.59 local time as per condition no.3 should be rejected.
- The Appellant asserts that the need for early morning flights is exaggerated.
- The Appellant states that there are no clear definition of terms uses in relation to condition 3(d).
- The protection of residential amenities from increased noise is queried.
- Reference is made to WHO Guidelines on night time noise.

### 4.0 Response to Items Raised in Third Party Appeal

Angela Lawton has raised several concerns in their grounds of appeal with regard to the proposed relevant action. This submission does not seek to re-iterate the detailed assessments that have been carried out as part of the application and we refer the Board particularly to the following assessments which have been prepared with the application and suitably respond to the issues raised by the Angela Lawton in her 3<sup>rd</sup> Party Appeal to the Board:

- Dublin Airport North Runway Relevant Action Application – Revised Environmental Impact Assessment Report (EIAR), prepared by AECOM, dated September 2021.
- Dublin Airport North Runway Relevant Action Application – Revised EIAR Appendices.
- Planning Report, prepared by Tom Phillips + Associates, dated September 2021.
- Response to ANCA Direction 01 in relation to planning application F20A/0668, Aecom, September 2021 including appendices.
- A Technical Report 'A11267\_19\_RP035\_4.0 NOISE INFORMATION – ANCA REQUEST FEBRUARY 2021', prepared by Bickerdike Allen Partners.
- Revised Regulation 598/2014 Assessment which Includes the following:
  - 'Dublin Airport North Runway Relevant Action Application, Regulation 598/2014 (Aircraft Noise Regulation) Assessment Non-Technical Summary'.
  - 'Dublin Airport North Runway, Regulation 598/2014 (Aircraft Noise Regulation) Forecast Without New Measures and Additional Measures Assessment Report' (Revision 2 – September 2021) Ricondo and Associates Inc.
  - 'Dublin Airport North Runway, Regulation 598/2014 (Aircraft Noise Regulation) Cost Effectiveness Analysis Report' (Revision 2 – September 2021) Ricondo and Associates Inc.
  - As noted, we suggest that the Board review this response in conjunction with the First Party response to the Third Party Appeal by St. Margaret's The Ward Residents Group. What follows is an overview of the responses to the key grounds of appeal raised by the Appellant.





What follows is an overview of the responses to the key grounds of appeal raised by the appellant.

#### 4.1 Cost Benefit Analysis

The Appellant questions the need for a cost benefit analysis of societal costs, climate change costs, airport communities health costs versus daa costs.

We refer the Board to Section 9 of the First Party Response to a Third-Party appeal submitted by Saint Margaret's The Ward Residents Group which addresses the Cost Effectiveness Analysis (CEA) in detail as well as the requirements of Regulation 598.

It is noted that Annex I and Annex II of Regulation 598 do not require the CEA to include for a health cost. Health effects should be considered as part of defining the noise problem and developing a Noise Abatement Objective (NAO). EU Regulation 598/2014 states in paragraph (11) on page 173/66: *"The importance of health aspects needs to be recognised in relation to noise problems, and it is therefore important that those aspects be taken into consideration in a consistent manner at all airports when a decision is taken on noise abatement objectives, taking into account the existence of common Union rules in this area. Therefore, health aspects should be assessed in accordance with Union legislation on the evaluation of noise effects"*.

The process of defining the noise situation must be consistent with Directive 2002/49/EC. The metrics chosen to assess the effectiveness of a measure's ability to meet the NAO are chosen to account for noise levels associated with human responses that can have an impact on health. Therefore, any measure that reduces the number of people exposed to a selected metric provides a benefit that contributes to resolving the noise problem. As indicated in Section 3.3.1 of ICAO's Guidance on the Balanced Approach to Aircraft Noise Management, ICAO Doc 9829 AN/451, the question that cost-effectiveness answers is: which alternative is the least costly means to achieve the level of benefit required by the NAO? Health costs are not a cost associated with implementing a proposed noise measure, but if noise levels are reduced by implementing the measure, a benefit is realised through reduction of any potential costs associated with noise-related health impacts. Health effects are considered when identifying the noise problem. The NAO includes metrics intended to address the identified noise problem and any reduction in exposure would result in a benefit realised through reduced potential health effects.

The EU Regulation 598/2014 cost-effectiveness analysis (CEA), as incorporated into the Aircraft Noise (Dublin Airport) Regulation Act 2019 (Act), is specific to addressing potential effects caused by aircraft noise as a result of revoking or replacing operating restrictions. The CEA conducted by Ricondo & Associates, Inc. (Ricondo), meets the requirements set forth in Annex I, Assessment of the Noise Situation at an Airport, of the European Union (EU) Regulation 598/2014 on the establishment of rules and procedures with regard to the introduction of noise-related operating restrictions at EU airports within a Balanced Approach and repealing Directive 2002/30/EC (EU 598/2014 Regulation).

A carbon and climate impact analysis as a result of the proposed Relevant Action to amend Condition No. 3(d) and replace Condition No. 5 of the North Runway Planning Permission was conducted and reported in Chapter 11 of the Dublin Airport North Runway Relevant Action Application Environmental Impact Assessment Report to assess potential environmental impacts. The assessment concluded that the greenhouse gas (GHG) emissions associated with the proposed Relevant Action do not represent >1% of the projected National Emissions Inventory for either of the assessment years, therefore, GHG emissions are considered to be



of minor significance. Section 11.5, Environmental Design and Management, of the EIAR identifies ways in which GHG emissions from aircraft movements have been or will be avoided, prevented, reduced and offset by various means. Aircraft are anticipated to become more fuel efficient over time as new technologies become available. Indirect aircraft emissions can be influenced by efficient airside infrastructure design and delivery and services such as Fixed Electrical Ground Power and how aircraft operate at the Airport (influenced by airlines, the Air Navigation Service Provider and daa). One such example is Airport Collaborative Decision Making (A-CDM) which Dublin Airport is implementing. This brings all stakeholders together to improve the efficiency of the airside operations at the airport. Section 11.5 also describes various market-based measures such as EU ETS and CORSIA, which put a cap on emissions within their respective geographical spheres of influence, to drive carbon reductions in the most effective and cost-effective areas through emissions trading and offsetting between airports. No other mitigation measures are required.

Please refer to Section 9 of the First Party Response to a Third-Party appeal submitted by Saint Margaret's The Ward Residents Group for further details.

#### 4.2 Noise Quota Scheme (NQS)

The Appellant believes that NQS should be rejected. It is stated that increasing incidents higher than 65 while slightly lowering peak levels to quota 4 would result in a huge increase in annoyance. The assessment completed show that the permitted operation has been shown to be the least cost-effective means to meet the Noise Abatement Objective (NAO). DAA proposed a Noise Quota Scheme (which has been modified by ANCA to cover the full night-period), an alternative runway operation scheme and a noise insulation scheme that is a more cost effective means for meeting the NAO. Further, through ANCA monitoring and reporting framework the effectiveness of these additional measures (on top of the existing measures) will be regularly reviewed, and action taken under *section 21(4) of the Aircraft Noise (Dublin Airport) Regulation Act 2019* if it is deemed by the competent authority that the NAO is not being achieved.

In the early 1990s the Quota Count (QC) system was first introduced by the UK, as part of a new night restrictions scheme for London Heathrow, Gatwick, and Stansted airports, and has been gradually followed by an increasing number European airports. The QC system relies on a count of aircraft movements (arrivals and departures) against a noise quota (in effect a noise budget), for each airport according to the QC rating. As such, the system allows a greater number of quieter aircraft movements within a given quota thereby encouraging the use of quieter aircraft at the airport. The Regulatory Decision (RD) applies noise restriction from 23:00 hrs to 06:59hrs – the standard night time period. The RD also restricts night time flying of noisier aircraft types. The RD applies a noise quota to the full 8 hour night time period and further restricts the use of noisier aircraft at the airport. One effect of this is that a greater number of less noisy flights would be possible and this in turn may encourage fleet modernisation with quieter aircraft.

An annual noise quota scheme effective over a period of six-and-a-half-hours from 23:30-05:59 (local time) had been proposed in the Relevant Action application. Following ANCA's review of the measures available, an alternative scheme, where an annual noise quota is proposed for an eight-hour period from 23:00-06:59 (local time) with restrictions on certain aircraft types based on their quota count, was also considered. Both noise quota schemes would allow Dublin Airport to meet its forecasts whilst ensuring noise exposure and health outcomes in 2025 and beyond would be better than those which occurred in 2019 and meet



the Noise Abatement Objective (NAO). It should be noted that ANCA scheme presented in the RD would require some change to the forecasted fleet mix from 2030 onwards.

Whilst the Forecast Without New Measures is also capable of meeting the NAO, this does not provide any limits on night-time noise beyond the NAO itself. ANCA determined that a restriction is necessary in the form of a limit to ensure that the Applicant's forecasts will be met. This is particularly important over the period to 2030 in anticipation of the 30% noise reduction target being required under the NAO. For this reason, ANCA considered that revoking Condition 5 would not be in line with the broader policy of setting limits as defined by the NAO.

The analysis presented throughout the ANCA Regulatory Decision Report shows that if Condition 5 is to be replaced to facilitate aircraft movements above the 65/night restriction set by Condition 5, then noise outcomes in terms of population Highly Annoyed and Highly Sleep Disturbed would be better than 2019 and would continue to improve over time. The aircraft type restrictions that shall accompany the NQS as it becomes effective are aircraft with a Quota Count (QC) of 4.0 on take-off and 2.0 on landing.

The Noise Quota Scheme will limit the impact of aircraft noise at Dublin Airport on communities surrounding the airport in accordance with the NAO. ANCA's Cost Effectiveness Assessment (CEA) identified that while it reduced the population highly sleep disturbed and population exposed above the NAO night-time priority of 55 dB Lnight, condition 5 was not the most cost-effective means of achieving the NAO. Replacing Condition 5 with a Night-Time Noise Quota and associated aircraft type restrictions is a much more cost effective means of managing and limiting aircraft noise impacts in line with the NAO. It allows the airport to meet its movement forecasts whilst guarding against the Applicant's noise forecasts being optimistic with respect to fleet modernisation. For example, should the aircraft fleet mix not improve as forecast, the Night-Time Noise Quota will limit the number of night flights. Overall, the Night-Time Noise Quota will place a limit on night-time aircraft noise.

#### **4.3 Need for Early Morning Flights**

The Appellant alleges that the need for early morning flights is exaggerated. The need for the proposed development has been set out in detail in the planning application and further information documentation submitted to FCC.

A key part of this growth is the demand for flights during the night's shoulder hours, being 2300 to 0000 and 0600 to 0700 hours. The demand for these flight times is partly as a result of Dublin Airport's geographical location and the one-hour time difference between it and mainland Europe, meaning that flights need to leave Dublin before 0700 hours to arrive at their destination for the start of the working day. This results in Dublin based aircraft having longer operating days than competing European hubs. Further to this Dublin's proximity to North America compared with the rest of Europe means that flights arriving from the west tend to arrive around 0500 hours, also allowing them to connect with European bound flights.

Therefore, in order to achieve the high levels of aircraft utilisation necessary for airline connectiveness, Dublin based short haul services tend to operate with first departure between 06:00-07:00 and last arrival after 23:00. This operation of service means that these short haul services can maximise the utilisation of aircraft throughout the day and operate cost efficiently.



This contributed to levels of demand for night flights (23:00-07:00) at over 100/night in 2019, with 113/night associated with regularly scheduled services on a typical busy Summer day of that year. The schedule structure of the airport in 2019 was reflective of the business models of both Aer Lingus and Ryanair, with a sharp departures peak in the 0600 hours period and a broader arrivals peak between 2200 hours and 0000 hours, i.e. first departures and last arrivals of the highly utilised short haul services.

Notwithstanding this, as a result of the Covid-19 pandemic, as per all other international airports, Dublin Airport has seen a significant drop in air traffic movements and passenger numbers. Dublin Airport has also experienced a number of foreign airlines exiting the Dublin market due to financial difficulties as a result of the Covid-19 pandemic. However, a strong sustained rebound is expected to return post pandemic. In order to forecast the future growth post Covid-19, future forecasts have been undertaken by Mott McDonald on behalf of daa and are included with this application for planning permission and response to FCC's request for FI. The forecasts identify that approximately 116/night movements in the typical busy day will be required when the airport returns to 32 million passengers per annum (mppa) by 2025. The forecasts also account for the loss of foreign airline traffic experienced as a result of the Covid-19 pandemic.

Once the above referenced operating restrictions come into operation, a large number of services will be restricted from what is currently an average 18+ hour operating day (0600-0000) to a 16-hour operating day (0700-2300). This will impact on the ability of these short haul services to achieve high utilisation rates by removing night flight slots during the night shoulder hours. The impact of this reduction in flight slots will not only be the loss of night departures or arrivals, but will also have a knock-on effect on the economic viability of the operation of these short haul services from Dublin Airport, with some likely to choose basing more aircraft at other European hubs. In this case, the air traffic lost will not just be confined to the night time flights, but also the daytime flights that would have operated throughout the day. In the likely instance where short haul services are unable to achieve high aircraft utilisation from Dublin Airport as a result of a reduction in night and day flights, a likely outcome will be an increase in passenger fares on remaining services.

An additional impact of the reduction in hours as a result of the coming into operation of conditions 3(d) and 5, will mean that aircraft services will be squeezed into a shorter operating day, resulting in less flexibility in the schedule to cope with delays and disruption. As a transatlantic hub, efficient flight connections are required to facilitate transfer passengers from North Atlantic flights to mainland Europe and vice versa. The Dublin Airport hub connecting model is based on these early morning long haul arrivals and early short haul departures being able to return to connect with long haul departures later in the day. Without this connecting traffic, Dublin Airport's ability to support transatlantic services would be severely compromised.

In this regard, it is considered that the coming into operation of the operating restrictions contained within Conditions 3(d) & 5 of the North Runway Planning Permission will impact severely on the airport's ability to maintain interconnected connectivity between long and short haul flights. Analysis by Mott McDonald on behalf of the Applicant identifies that upon commencement of the operating restrictions the number of night flights will fall by 44%, to the permitted 65/night. This will require existing early morning peak slots to be moved to 0700 hours and late evening peak slots to be moved to 1000 hours where possible. However, not all existing slots will be able to be moved given the interconnected nature of flight movements, and the forecasts submitted with this application expect that there will be a loss



of 5.4% of aircraft movement into and out of Dublin Airport over a busy 24 hour day upon commencement of the operating restrictions.

The forecasts indicate that without the proposed Relevant Action (the permitted scenario), the permitted capacity of 32mppa will be reached in 2027. However, with the proposed Relevant Action (the proposed scenario), the permitted capacity will be reached two years sooner. As a result, it is evident that the proposed Relevant Action will provide for a faster recovery rate back to the permitted capacity which would not otherwise be achieved.

#### 4.4 Condition 3(d) Terms Used

In relation to condition 3(d), the Appellant states that *'there is no clear definitions of terms used'*. It is not clear what terms the Appellant is referring to. Condition 4 of the permission states that:

*"The existing operating restrictions imposed by condition 3(d) and the exceptions at the end of condition 3 of the North Parallel Runway Planning Permission (FCC Reg. Ref: F04A/1755; ABP Ref: PL06F.217429 reading: 3(d) Runway 10L-28R shall not be used for take-off or landing between 2300 hours and 0700 hours except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports".*

shall be amended as follows:

*"Runway 10L/28R shall not be used for take-off or landing between 00:00 and 5:59 (inclusive, local time) except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports or where runway 10L/28R length is required for a specific aircraft type".*

Apart from the change of hours that Runway 10L/28R, the only other change relates to an amendment to the exceptions whereby the north runway can be used outside of these hours. The additional exception is to facilitate a specific aircraft type that otherwise could not be accommodate on the south runway.

#### 4.5 Protection of Residential Amenities

The Appellant queries how residential amenities would be protected from increased noise. The impacts on residential amenities is considered to have been adequately assessed within the revised EIAR. We refer the Board in particular to Chapter 7 of the EIAR – Population and Human Health. Chapter 7 states that *'the assessment on amenity and local communities is concerned with how the proposed Relevant Action potentially impacts on the ability of residents and users of community and recreational facilities to achieve enjoyment and/or quality of life'*.

Chapter 7 confirms that *'Assessing the impact of the proposed Relevant Action on amenity and local communities has taken into account the combined residual significant effects from other assessment topics (Chapter 13: Aircraft Noise and Vibration, Chapter 14: Ground Noise and Vibration, Chapter 10: Air Quality and Chapter 11: Climate and Carbon) which could affect people's enjoyment of a community facility, public space or residential property'*.



The impact of noise and vibration on community facilities is also considered within Chapter 13: Aircraft Noise and Vibration. The assessment considers, schools, residential healthcare facilities and places of worship as high sensitivity receptors. For all Assessment Years (2022, 2025 and 2035), under both the 24-hour period and overnight assessment metrics, there are no significant residual air noise and vibration effects reported on schools, residential health care facilities or places of worship when comparing the Permitted and Proposed Scenarios.

The impact of noise and vibrations on community facilities is also considered within Chapter 14: Ground Noise and Vibration. The assessment considers dwellings, schools, residential healthcare facilities and places of worship as high sensitivity receptors. Receptors with a lower sensitivity to noise, such as open spaces and recreation grounds, have not been considered as part of the assessment. For all Assessment Years (2022, 2025 and 2035), under both the 24-hour period and overnight assessment metrics, there are no significant residual air noise and vibration effects reported on schools, residential health care facilities or places of worship when comparing the Permitted and Proposed Scenarios

#### **4.6 WHO Guidelines**

There appears to be a common misconception that no-one should be exposed to the WHO guideline noise values. They are guideline values, not a "must not expose" set of limits for outdoor noise. Through the planning process it is accepted that it is not possible to have zero effects but assessment should identify where significant effects arise and mitigate accordingly consistent with the principles of sustainable development. For example, residential development within the city area or in proximity to rail and road are unlikely to achieve the WHO guideline noise value.

A Noise Abatement Objective (NAO) has been developed that clearly sets out that "limiting and reducing effects" are central and sets targets for reducing over the coming decade. Alongside this, a noise insulation scheme (that goes beyond standard precedent) has been proposed to mitigate the effects of aircraft noise, in particular reduce sleep disturbance and the Noise Quota Scheme has been set-up to control total aircraft noise output. In addition, monitoring and reporting will show progress against the targets and the regularity framework provides ANCA with powers to implement additional measures if the targets are not being met or if the proposed measures are not being delivered and complied with.

#### **5.0 Conclusion & Recommendations**

As indicated in the above submission and the material submitted with the application, it is considered that the proposal as determined by the planning authority and competent authority (ANCA) is appropriate. The proposed Relevant Action is fully in compliance with multi-governmental strategic objectives and policies that seek to facilitate the growth of Dublin Airport and foster the airport's connectiveness to the UK, Europe and wider global environment. By comparison, the permitted operating restrictions which this application seeks to amend/replace run contrary to these strategic objectives and policies.

The potential for impacts on local communities as a result of the proposed Relevant Action has been assessed in great detail through the course of preparing this application and subsequent response to FCC's request for FI and ANCA's Direction's. In this regard, the proposed Relevant Action seeks to apply a balanced outcome. As a result, in addition to amending/replacing the above referenced operating restrictions the proposed Relevant Action also seeks to propose a preferential use of the runway system, a noise insulation grant scheme, a night noise quota system and a noise monitoring framework.



This package of measures will ensure that the overall noise effects of the proposed Relevant Action will not exceed the noise situation from 2018. In this regard the proposed Relevant Action is fully in accordance with the proper planning and sustainable development of the area and we respectfully request that Board not allow the appeal and direct permission to be issued without delay.

Yours Sincerely

**Director**  
**Tom Phillips + Associates**

