

File With _____

SECTION 131 FORM

Appeal NO: ABP 314485-22Defer Re O/H ☐Having considered the contents of the submission (dated) received 02/04/2024
fromSMTW Environmental DAC 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 material issuesE.O.: Pat BDate: 19/04/2024

For further consideration by SEO/SAO

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 2/3/4 weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ABP 314485-22

M _____

Please treat correspondence received on 02/04/2024 as follows:

- | | |
|---|---|
| 1. Update database with new agent for Applicant/Appellant _____ | 1. RETURN TO SENDER with BP _____ |
| 2. Acknowledge with BP <u>23</u> | 2. Keep Envelope: <input type="checkbox"/> |
| 3. Keep copy of Board's Letter <input type="checkbox"/> | 3. Keep Copy of Board's letter <input type="checkbox"/> |

Amendments/Comments SMTW Environmental DAC response to S.13112/03/24: 02/04/24 ✓

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 ☐EO: pk bDate: 19/04/2024
Plans Date Stamped ☐
Date Stamped Filled in ☐
AA: Anthony McNallyDate: 25/04/2024

SMTW Environmental DAC
Ward Cross,
The Ward,
Co. Dublin

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902
2nd April 2024

**RE: FURTHER INFORMATION PROVIDED TO AN BORD PLEANALA BY THE DAA
ON PLANNING APPLICATION F20A/0668**

Dear Sir/Madam,

We welcome the letter from An Bord Pleanála, dated March 12th, 2024, requesting written submissions on the further information request from the Board to the daa.

The information provided by the daa, in the form of revised eligibility maps, clearly illustrates the significant difference between the noise contours on which the ANCA regulatory decision and Fingal County Council planning decision were based. This confirms the central point of our appeal, the assessment has adopted different flight paths to those which were permitted as part of the North Runway EIS in 2007. The impact of changing flight paths is that areas find themselves significantly impacted by aircraft noise when they never expected to be impacted. In fact, over 7km² of newly affected areas are now so significantly affected they qualify for mitigation. Figure 1 illustrates the extent of this new area.

We represent the residents in this area and have identified dozens of families that never made submissions on the proposed development and so have no right of reply at this stage. They find themselves significantly affected by the proposed development. As a result of the failings of daa to correctly assess the impacts during the initial stages of the application they are finding this out for the first time now, at the eleventh hour of the application process. We have attached to this submission, in Appendix A, letters from residents in this newly affected area to illustrate this failing of the application process to date.

Our submission also includes, at Appendix B, an assessment from Mr Hendrik W van der Kemp, Town Planner, of the additional information received. His report highlights again the difference between permitted and Relevant Action flight paths and that the application to simply amend specific conditions of the parent permission without reviewing the full planning permission is concerning. Further comments are presented on the planning implications for the area with the new noise contours, specifically with regards to the rural village designation of Coolquay, Kinsealy and Rivermeade.

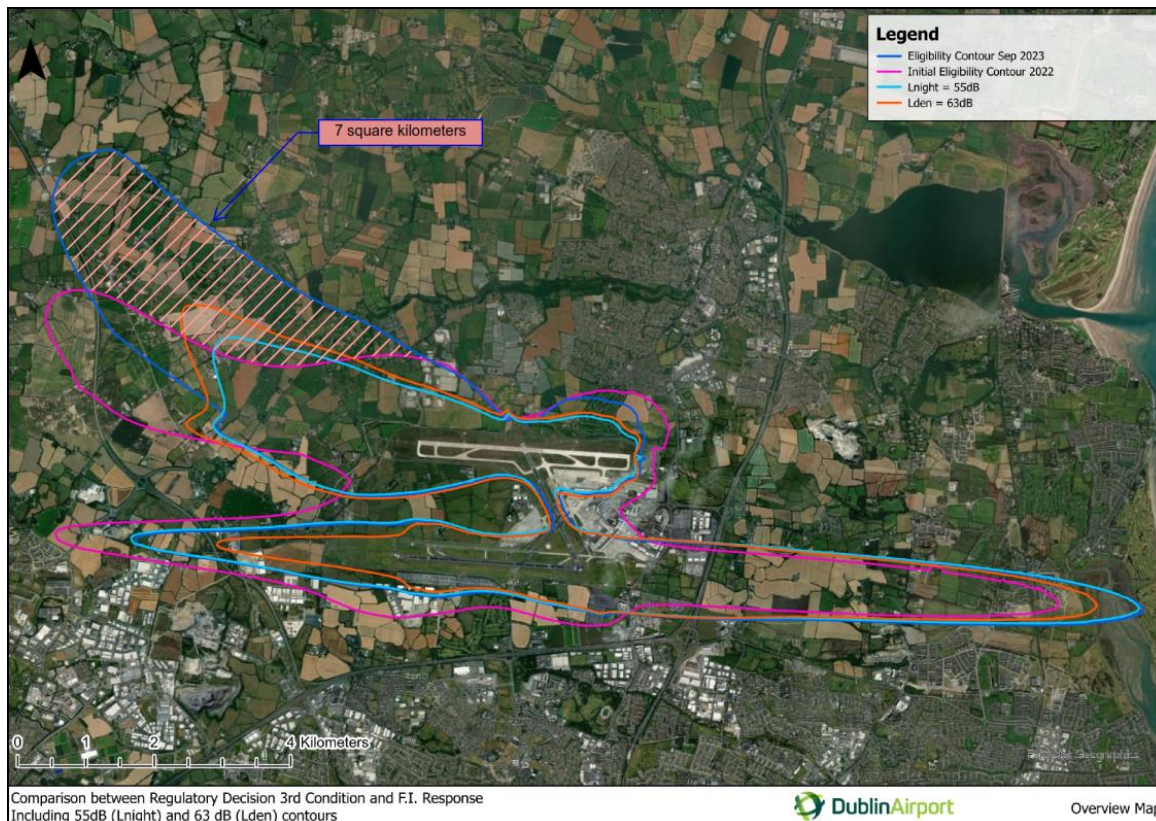


Figure 1 Additional 7km² of Very Significantly Affected Area

The information requested by ABP also includes a new contour measured as 63dB L_{den}. This is a contour that combines the noise impact across a full 24hr period and takes into account both day, evening and night-time periods. As outlined in our appeal previously the significance of noise impacts during the day as a result the change in flight paths over those granted permission in 2007 has not been assessed.

The document “Environmental Assessments and Planning in Ireland¹” produced by the Office of the Planning Regulator (OPR) is clear on the importance of identifying all significant effects,

The purpose of EIA is to protect the environment by ensuring that before deciding whether to grant planning permission for a development proposal, the planning authority or An Bord Pleanála fully understands the significant effects it is likely to have on the environment and has factored that in to the decision.

In the context of this appeal we contend that the significance of daytime impacts which result from the change in flight paths has not been adequately assessed.

This is a fundamental flaw in the assessment as the EIA Directive is clear, all significant impact on the environment must be identified, quantified and mitigation proposed. That has not happened to date in this application. For example, the methodology for determining night-time impacts is to determine the change in noise level across the study area as a result of the proposed development. For areas under the North Runway this involves comparing the scenario with no night flights from the North Runway to a scenario where there will be night flights.

¹ <https://www.opr.ie/wp-content/uploads/2022/10/Planning-Leaflet-11-Environmental-Assessments-and-Planning-in-Ireland.pdf>

Figure 2 illustrates the daytime noise contours produced for the year 2025 and submitted to An Bord Pleanála as part of a response to a request for additional information during the Oral Hearing into the North Runway in March 2007.

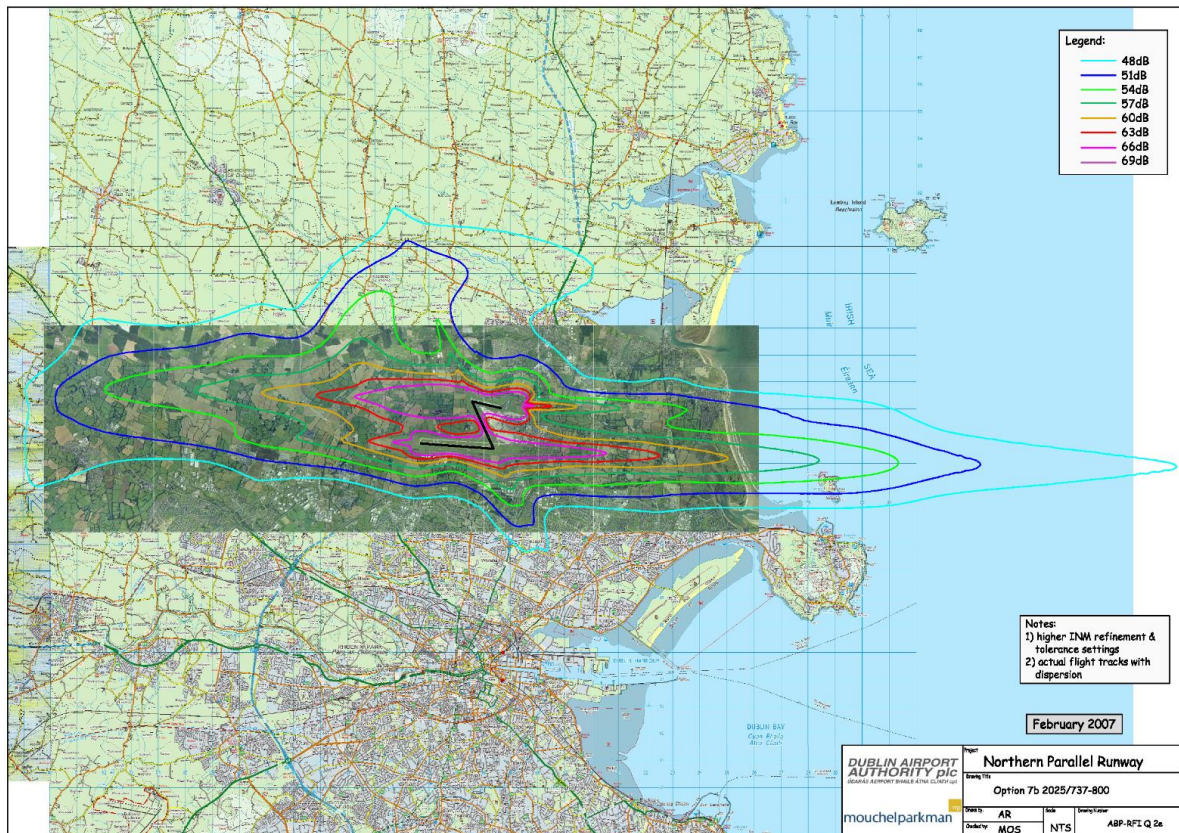


Figure 2 Daytime Noise Contours North Runway EIS 2007

Figure 3 illustrates the same noise contours submitted as part of the supplemental EIAR DAA submitted in September 2023 as part of this appeal.

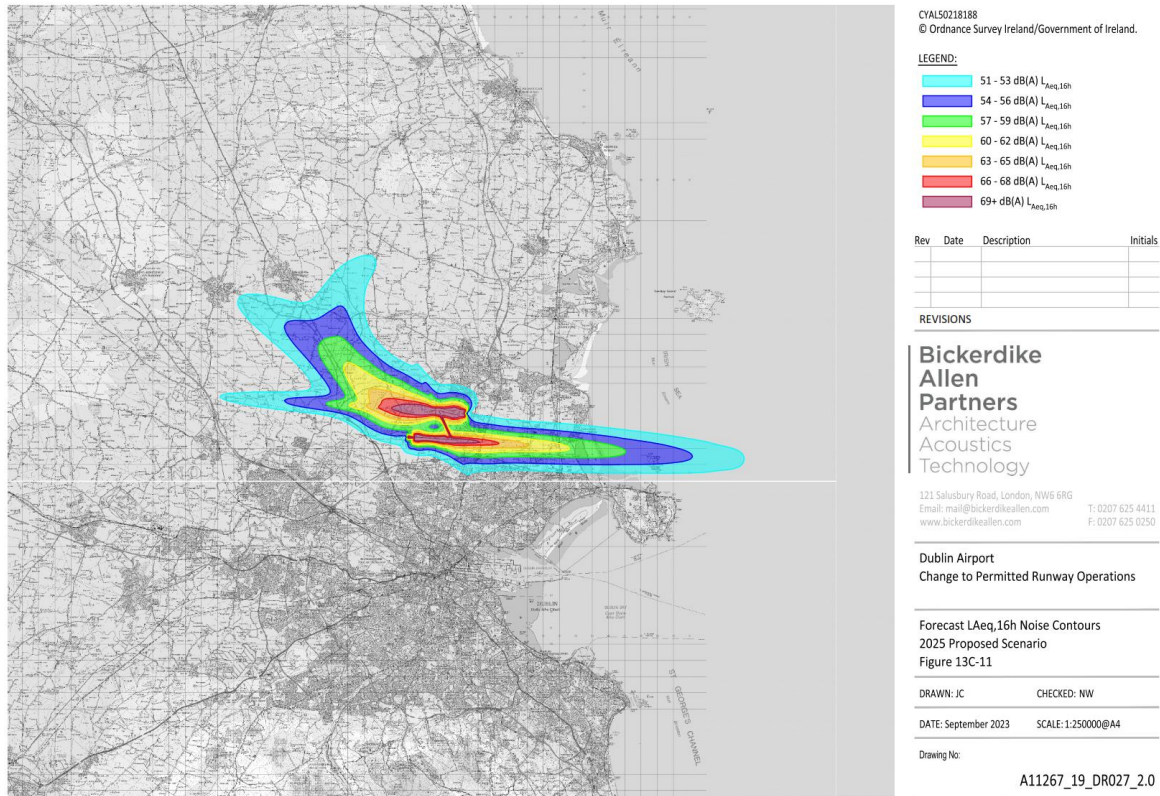


Figure 3 Daytime Noise Contours Relevant Action Supplemental EIAR 2023

To help illustrate the large difference in the shape of the daytime noise contours Figures have been created by overlaying both sets of noise contours for the 57dB and 63dB $L_{Aeq,16hr}$ contours. The difference is obvious with many areas now exposed to higher daytime noise levels as a result of different flight paths. The significance of the daytime noise impact has not been assessed.

Table 1 below summarises the difference in daytime $L_{Aeq,16hr}$ noise level at some specific locations when the expected noise level from the original North Runway planning documentation is compared against the daytime noise level now presented by daa in their application. Using the impact rating from the daa EIAR a very high impact is predicted by such a change.

Location	Original EIS dB $L_{Aeq,16hr}$	RFI dB $L_{Aeq,16hr}$	Difference, dB	Air Noise Impact Rating
Coolquay/Kilcoskan NS	51	60	+9	Very High
Newtown Cross	48	57	+9	Very High

Table 1 Comparison of Daytime Change in Noise - 2007 EIS vs 2023 EIAR

It is clear that there are areas now experiencing very high relative changes in the daytime noise level expected based on the original North Runway EIS versus the proposed development. This very high impact rating is not assessed for significance with is a fundamental flaw in the assessment.

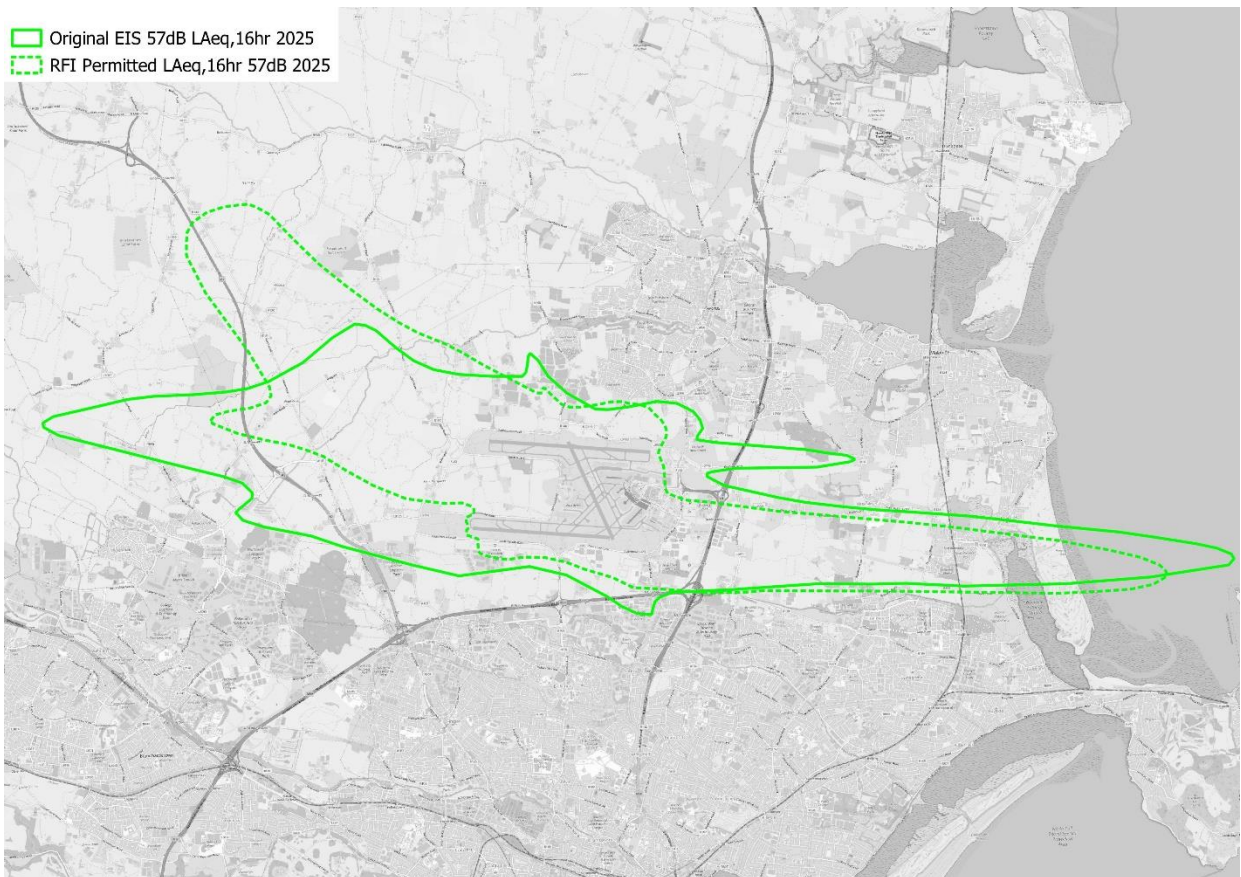


Figure 4 Comparison of 2024 57dB LAeq,16hr Noise Contour - 2007 EIS vs 2023 EIAR

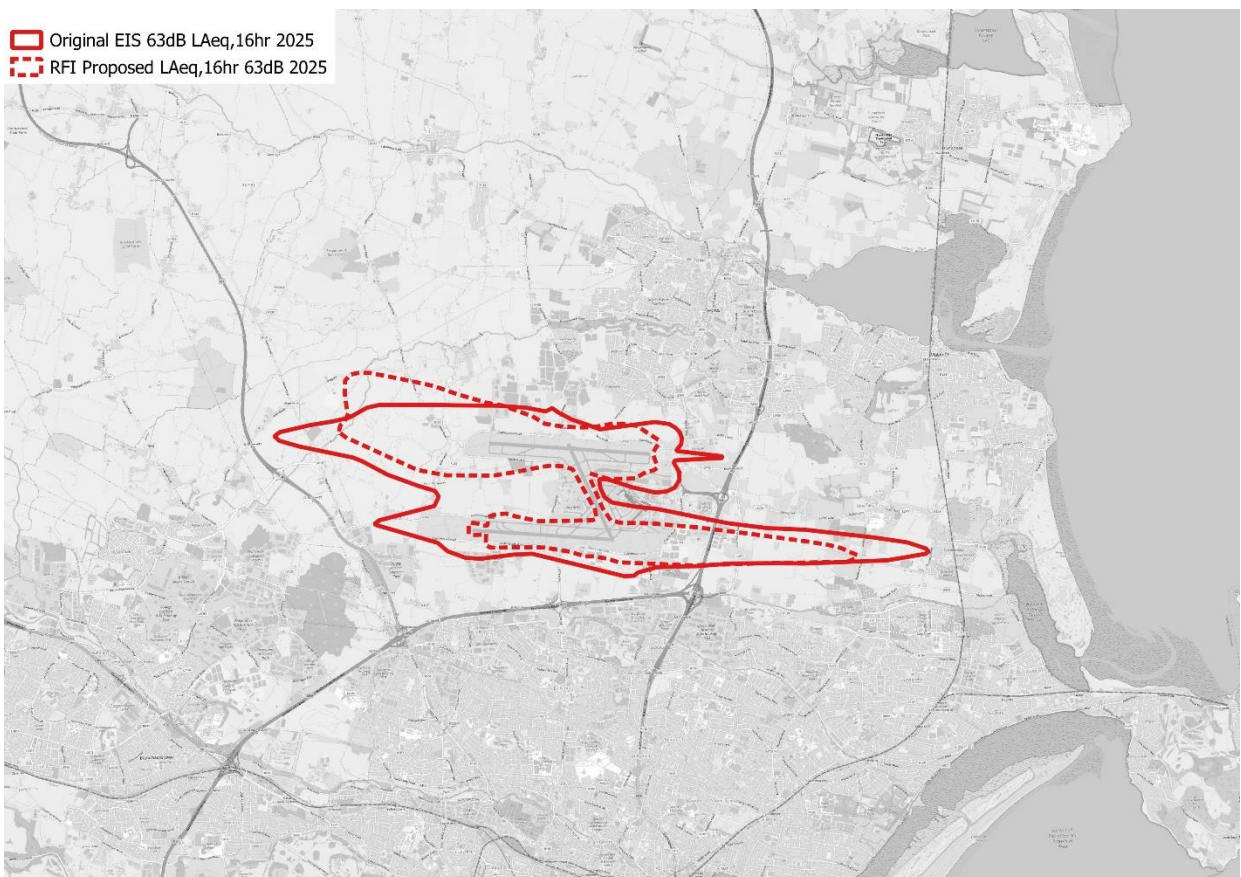


Figure 5 Comparison of 2024 63dB LAeq,16hr Noise Contour - 2007 EIS vs 2023 EIAR

There are also significant concerns around the accuracy of the noise contours produced by the applicant, which is relevant to the insulation scheme contours produced. In our submission in December 2023 we included monitoring reports for the noise measurements we carried out during the summer of 2023. Since then daa have submitted a new planning application to Fingal County Council for new infrastructure works and additional passengers of up to 40 million (Reg Ref. F23A/0781). Within that application noise contours are presented for the actual Summer 2023 scenario which allows for direct comparison to our monitoring. Both Fingal County Council and ANCA have requested large amounts of additional information from daa some of which is very relevant to the accuracy of the noise modelling. We ask that An Bord Pleanála also review the requests made by Fingal County Council and ANCA and have attached them to Appendix C of this submission.

All noise contours presented in the DAA application take into account a modal split to average out the noise levels across days when the airport may operate with westerly winds versus easterly winds. This has the effect of discounting the noise contours presented to communities and does not represent an example of the worst-case noise that will be experienced on a given day.

It is worth considering the implications of adopting any modal split in the context of assessing actual impacts on communities around the airport. A modal split of 70% westerly and 30% easterly reduces the noise levels on the contour maps by up to 1.5dB. While this may not seem like much it is when viewed in the context of eligibility for insulation schemes. Fingal Co Co (FCC) recognised this issue and when creating the noise zones for inclusion in the FCC Development Plan, the noise contours were produced on the basis of single mode operation. Single mode operation represents the situation for any given day when flights may be operating in a particular direction. We propose that the same approach should be adopted for the definition of noise mitigation contours associated with the operation of Dublin Airport.

The impact on the size of eligibility contours has been estimated by the following approach,

1. Review of noise measurements taken by Wave Dynamics on behalf of our community to determine the typical noise level at each location during westerly single mode operations in the summer 2023 92-day modelling period;
2. Review of noise measurements taken by DAA at Kilcoskan National School to determine the typical noise level during westerly single mode operations in the summer 2023 92-day modelling period;
3. Review of the grid calculation results provided by DAA to the planning authority in GIS Shapefile format for the summer 2023 92-day modelling period;
4. Determination of the difference in terms of decibels between DAA grid calculations at each location and actual measurement data at the same locations;
5. Recalculation of the noise contours to include this difference using the summer 2023 92-day modelling period grid file.

The results of our analysis is as follows.

Review of Wave Dynamics Monitoring

At the residence of Pearse Sutton, the range of noise levels measured in terms of the $L_{Aeq,16hr}$ parameter as well as the location of this residence are summarised in the following figures.



Figure 2: Site location in Relation to Dublin Airport and the new North Runway.

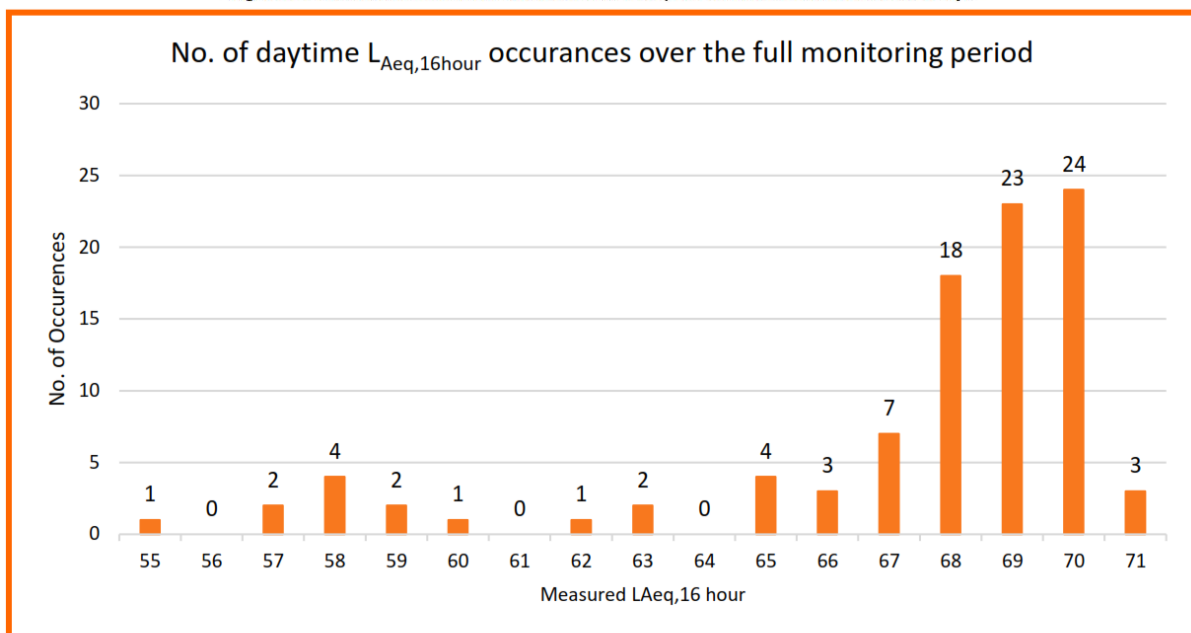


Figure 4: Number of daytime $L_{Aeq,16hour}$ occurrences over the full monitoring period

The most common noise level measured when flights were departing from the North Runway in a westerly direction was 70dB $L_{Aeq,16hr}$.

At the residence of Teresa Sweeney, the range of noise levels measured in terms of the $L_{Aeq,16hr}$ parameter as well as the location of this residence are summarised in the following figures.



Figure 2: Site location in Relation to Dublin Airport and the new North Runway.

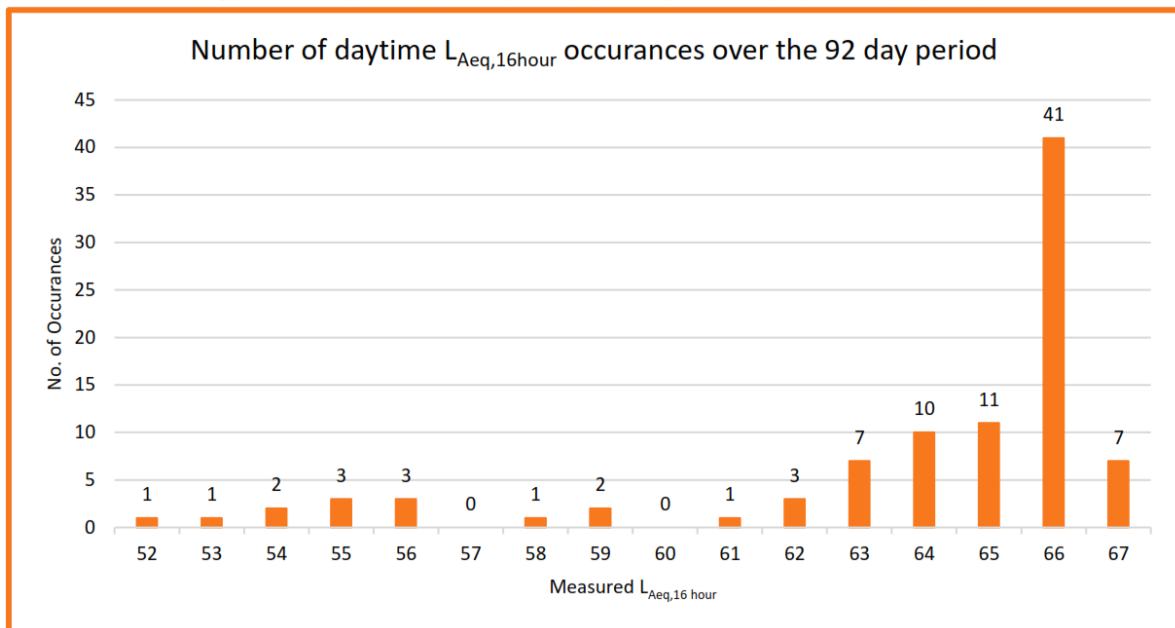
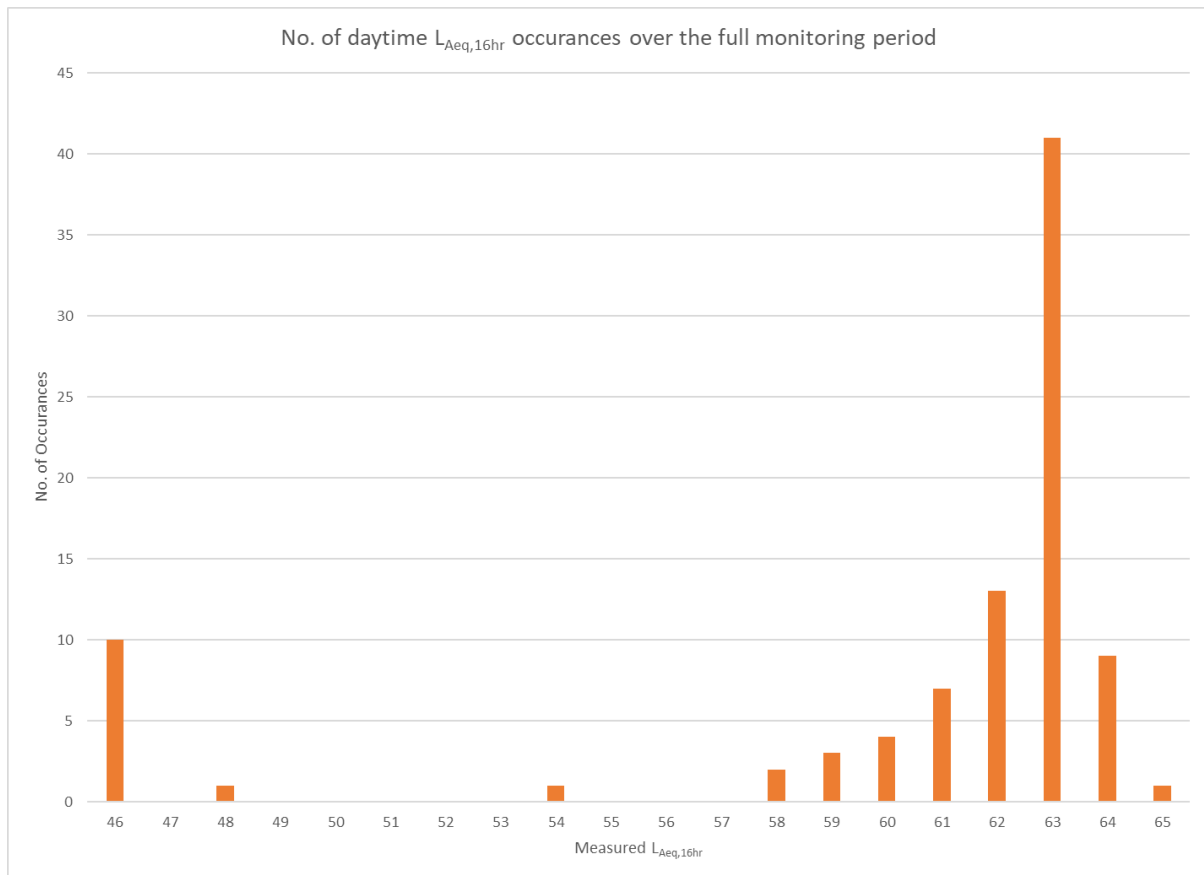


Figure 4: Number of daytime $L_{Aeq,16hour}$ occurrences over the full monitoring period

The most common noise level measured when flights were departing from the North Runway in a westerly direction was 66dB $L_{Aeq,16hr}$.

Review of DAA Monitoring at Kilcoskan NS

DAA have had a noise monitor at Kilcoskan NS since November 2022. This data was made available to the Board of Management of the school who in turn have provided it to the SMTW group. Using the data for the 92-day monitoring period it is possible to calculate the $L_{Aeq,16hr}$ for each day and chart the results as Wave Dynamics did. The results are presented overleaf.



The most common noise level measured when flights were departing from the North Runway in a westerly direction was 63dB $L_{Aeq,16hr}$.

Figure 6 presents the locations of the noise monitors with westerly departure flight paths also indicated in green. Overlaid on the image are the noise contours for the Summer 2023 period produced by daa and included in the Infrastructure Application (Reg Ref. F23A/0781).

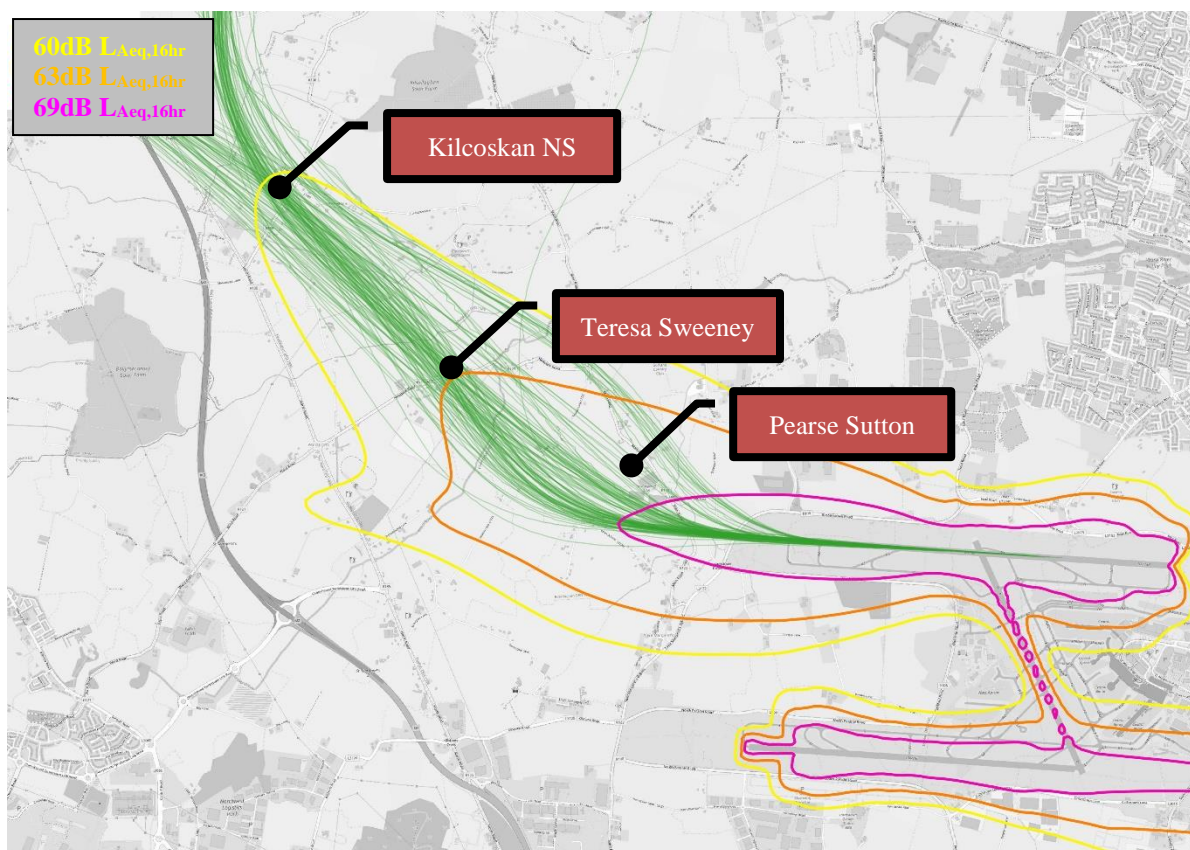


Figure 6 Comparison of Monitoring Locations to DAA Summer 2023 Noise Contours

Collating these results into a table for comparison provides the following results.

Location	Measured Single Mode Day dB LAeq,16hr	Estimated DAA Calculated dB LAeq,16hr	Difference, dB
Pearse Sutton	70	~67	3
Teresa Sweeney	66	~63	3
Kilcoskan NS	63	~60	3

Table 2 Comparison of Monitoring Results to DAA Contours

It is clear that there are large differences of 3dB between the measured noise levels and the DAA calculated noise levels.

A similar exercise can also be done for the Relevant Action night-time noise levels. As part of the information submitted by DAA to ABP single mode noise contours for a fully easterly and fully westerly scenario were presented. Specifically reviewing 2025 as the year when noise impacts are worst the following images reproduce these single mode contours for the proposed scenario.

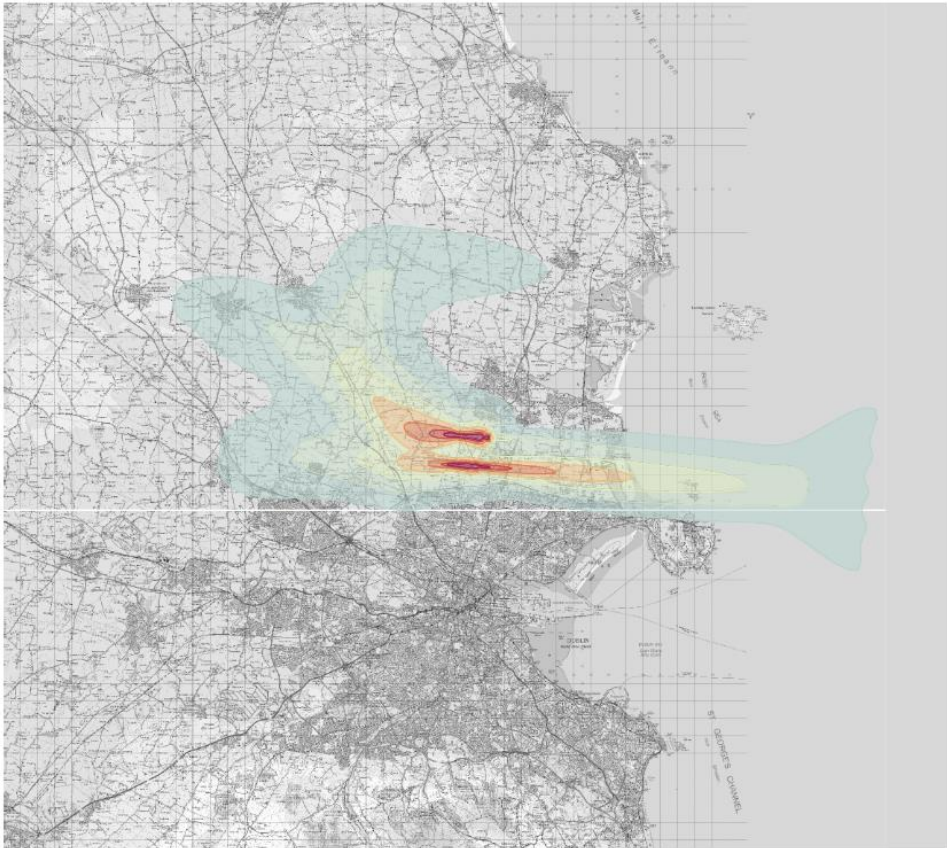


Figure 7 Single Mode Westerly Operations Nlight 2025

CYALS0218188
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LEGEND:

40 - 44 dB(A) L_{night}

45 - 49 dB(A) L_{night}

50 - 54 dB(A) L_{night}

55 - 59 dB(A) L_{night}

60 - 64 dB(A) L_{night}

65 - 69 dB(A) L_{night}

70+ dB(A) L_{night}

Rev	Date	Description	Initials

REVISIONS

Bickerdike
Allen
Partners

Architecture
Acoustics
Technology

121 Salisbury Road, London, NW6 6RG
Email: mail@bickerdikeallen.com
www.bickerdikeallen.com

T: 0207 625 4411
F: 0207 625 0250

Dublin Airport

Change to Permitted Runway Operations

Forecast Night Noise Contours (Westerly)
2025 Proposed Scenario
Figure 13C-38

DRAWN: JC

CHECKED: NW

DATE: September 2023

SCALE: 1:250000@A4

Drawing No:

A11267_19_DR054_2.0

Figure 8 Single Mode Easterly Operations Nlight 2025

CYALS0218188
© Ordnance Survey Ireland/Government of Ireland.

LEGEND:

40 - 44 dB(A) L_{night}

45 - 49 dB(A) L_{night}

50 - 54 dB(A) L_{night}

55 - 59 dB(A) L_{night}

60 - 64 dB(A) L_{night}

65 - 69 dB(A) L_{night}

70+ dB(A) L_{night}

Rev	Date	Description	Initials

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Dublin Airport

Change to Permitted Runway Operations

Forecast Night Noise Contours (Easterly)
2025 Proposed Scenario
Figure 13C-37

DRAWN: JC

CHECKED: NW

DATE: September 2023

SCALE: 1:250000@A4

Drawing No:

A11267_19_DR053_2.0

It is possible to combine the 55dB L_{night} contour from both easterly and westerly scenarios to determine a worst-case single mode 55dB L_{night} contour. Figure 9 presents a comparison of the 55dB L_{night} contour proposed by DAA as a qualifying metric for the noise insulation grant scheme with the single mode 55dB L_{night} contour.

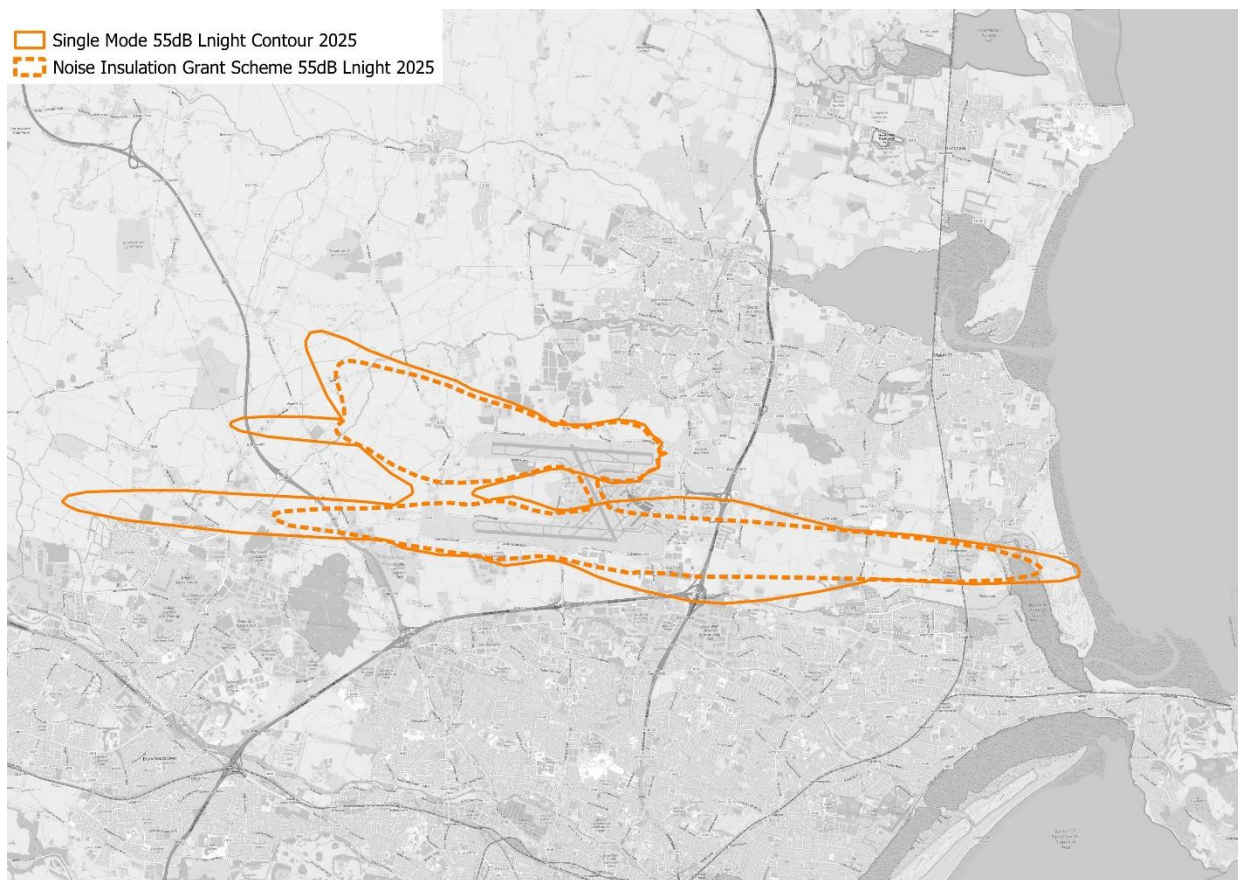


Figure 9 Single Mode 55dB L_{night} Contour

Reviewing the areas it is clear that many more dwellings can be exposed to 55dB at night than the current eligibility contour for RGIS would determine. A similar exercise should be done for the second eligibility criteria of areas that experience 50dB L_{night} and an increase of 9dB or more above the expected noise level.

The result of our analysis shows that DAA dilute significantly the areas that may experience significant noise levels by adopting an approach that uses a modal split. We submit that it is necessary for the planning authority to redefine the definition of all noise contours used for mitigation measures to ensure that single mode contours are produced. This would align with the approach FCC used for the Noise Zones around Dublin Airport and ensure that all affected areas are mitigated for noise exposure they may receive on any given day.

Furthermore, it is imperative that, in event of granting permission, ABP ensure that noise mitigation measures at Dublin Airport are the most progressive measures at any airport worldwide. A full detailed reassessment of all noise mitigation measures is necessary including the consideration of the following points,

- Many residents now find themselves living in an area with noise levels equivalent to those that define Noise Zone A in the Fingal County Development Plan 2023 to 2029. This is a noise level that Fingal describe as “high levels of aircraft noise, which may be harmful to health or otherwise unacceptable.” If Fingal will not allow new dwellings to be built in this zone then it is logical that the same noise level is used as the definition

of a new mitigation scheme. This scheme should be to offer voluntary purchase, relocation to an equivalent property in the area that is not subject to the same noise levels or for residents to stay and be provided with the maximum level of noise insulation that can be provided.

- A similar scheme must also be provided for those subject to unacceptable levels of night time noise and profound noise impacts. This should take into account not only the noise level but the frequency of flights which is known to be linked to awakenings. If assessment shows a typical person cannot sleep without being woken then that property is unsuitable for habitation.
- Insulation should be expanded to a wider area taking into account the increase annoyance that occurs as a result of the new flight paths being used. Looking to the future some guidance such as Aviation 2050 in the UK would recommend insulation to areas exposed to 54dB LAeq,16hr or greater if there has also been a change in airspace that has increased noise by 3dB or more – this condition would certainly be satisfied for large parts of Fingal and East Meath now being overflown.

Finally, our submission also includes at Appendix D a more detailed submission by our committee on the information submitted. This includes discussion on the following points which we urge An Bord Pleanála to take into account,

- How the Relevant Action would constitute a material contravention to the Fingal Development Plan 2023-2029 due to the non-compliance with the Dublin Airport Noise Zones contained within the development plan.
- The impact that the changing noise climate will have on the rural villages in our communities.
- The inadequacy of the maps submitted by daa to allow An Bord Pleanála and the general public to determine the number of properties included in the proposed grant scheme.
- Confirmation of other methods of operating dual runways at Dublin Airport which would allow the flight paths to match those in the original North Runway EIS and grant of permission.
- Confirmation that the proposed development cannot meet the Noise Abatement Objective set by ANCA for the number of people exposed to night noise levels greater than 55dB Lnight.
- Inadequacy of the significance criteria adopted by daa and the resulting exclusion from any mitigation of people significantly affected.
- Demonstration that daa are operating Dublin Airport in breach of other related planning conditions set by An Bord Pleanála in the past.

In conclusion, planning is an afterthought for the daa. Their actions show they do not respect the decisions of the Board. It is 20 months now since the North Runway opened. Fingal County Council has taken enforcement proceedings against the daa in relation to the breach of Condition 5 (65 nighttime flights). The Council is also investigating the alleged illegal divergent flight paths off the North Runway. Unfortunately, for residents, the Council seems incapable of coming to a decision and appears to be waiting on the Board's decision in this Relevant Action application. It is therefore of utmost importance that the Board makes a decision in a timely manner to refuse permission for the Relevant Action application.

Yours sincerely,

Liam O'Gradaigh
On behalf of St. Margaret's The Ward Residents Group

APPENDIX A
LETTERS FROM AFFECTED FAMILIES

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

RE: An Bord Pleanala reference ABP-314485-22 Relevant Action at Dublin Airport

Dear Liam

I would firstly like to thank you and the rest of the Committee for presenting us with a very informative presentation with respect to the extension of the eligibility noise contours as submitted by DAA to ABP as part of their Relevant action submission which was put up on the ABP case file site in early March this year.

We had previously understood that the new altered flight paths off the new North runway which commenced in August 2022 would not interfere with our home. This has not proved to be the case. We have had constant noise from 7 a.m. every morning with planes flying at a low altitude over the house. We now note that these new contour maps indicate that the proposed night flights will have such an effect on our home that we will qualify for a noise insulation grant under their proposal.

This is most upsetting to us as we were never notified that this planning application involved the changing of flight paths that would affect our home. All maps we looked at to date excluded us from any of this. How can this happen without a public notice being provided to warn us of such an event.

I am appalled that we have to date had no communication from the DAA about any noise impact on our area. If I had not attended your meeting, I would still have no idea that our house now falls within these new contour maps.

We have therefore not submitted any observation or submission on this matter previously and understand that as such we cannot now write to ABP.

We would like to ask for your help and request that you submit this letter with your submission/observation notifying them of this very unjust situation so that they may right this wrong and notify all concerned about this significant additional information that has revised the planning application and to allow us to submit formally to ABP.

I note that whilst the area under the noise contours have got larger there is no specific significance criteria analysis for the impact on this area, how significant the impact is and no proposals to show how this impact is to be mitigated at my house to ensure our health is being protected from such noise.

Up until the opening of the North Runway we had no aircraft noise and now the elevation is very significant and profound as there was very little noise in this rural location.

Thank you for your help

Yours Sincerely

Alwean Finnegan

Dated. *02/04/2024*

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
Co Dublin.

RE: An Bord Pleanála reference ABP-314485-22 Relevant Action at Dublin
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Yours Sincerely

Hugh Denree

Dated.

30-3-24.

Mr Liam O Gradaigh

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The Ward Cross

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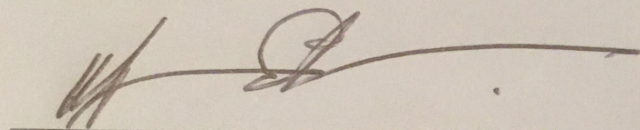
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Up until the opening of the North Runway we had no aircraft noise and now the elevation is very significant and profound as there was very little noise in this rural location.

Thank you for your help.

Yours Sincerely

A handwritten signature in dark ink, appearing to be 'Finbarr Shanahan', written over a horizontal line.

Finbarr Shanahan

AISLING, COOLQUAY, THE WARD
CO. DUBLIN. D11 YR59.

Dated: 01/04/2024

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
Co Dublin.

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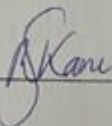
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Thank you for your help.

Yours Sincerely

Sign: 

Date: 28/3/24

Address: Kiloshan, The Ward, Co. Dublin, D11 E579

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
Co Dublin.

RE: An Bord Pleanála reference ABP-314485-22 Relevant Action at Dublin Airport

Dear Liam

I would firstly like to thank you and the rest of the Committee for presenting us with a very informative presentation with respect to the extension of the eligibility noise contours as submitted by DAA to ABP as part of their Relevant action submission which was put up on the ABP case file site in early March this year.

We had previously understood that the new altered flight paths off the new North runway which commenced in August 2022 would not interfere with our home. However, we now note that these new contour maps indicate that the proposed night flights will have such an effect on our home that we qualify for a noise insulation grant under their proposal.

This is most upsetting to us as we were never notified that this planning application involved the changing of flight paths that would affect our home. All maps we looked at to date excluded us from any of this. How can this happen without a public notice being provided to warn us of such an event.

We have therefore not submitted any observation or submission on this matter previously and understand that as such we cannot now write to ABP.

We would like to ask for your help and request that you submit this letter with your submission/observation notifying them of this very unjust situation so that they may right this wrong and notify all concerned about this significant additional information that has revised the planning application and to allow us to submit formally to ABP.

I note that whilst the area under the noise contours have got larger there is no specific significance criteria analysis for the impact on this area, how significant the impact is and no proposals to show how this impact is to be mitigated at my house to ensure our health is being protected from such noise.

Up until the opening of the North Runway we had no aircraft noise and now the elevation is very significant and profound as there was very little noise in this rural location.

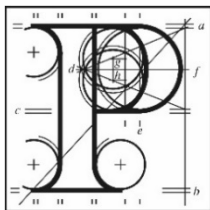
Thank you for your help.

Yours Sincerely

Sign: William Fleming

Date: 30/03/24

Address: Maryville, Coolgreagh, Newry, Down, ~~BT~~
D11 NP 59



An
Bord
Pleanála

Observation on a Planning Appeal: Form.

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

Patrick Courtney

(b) Address

Coolquay
The Ward
Co. Dublin D11NW08

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.

Dated: 22/3/2024

Since the opening of the North Runway in August 2022, aircraft have been flying in the vicinity of my home which they never planned to do and the environmental impacts of this unplanned flight path were never assessed or presented in the planning application. Every flight on the North Runway is an extreme noise problem for me & my family. As the current complaints system is completely impractical I hereby request that you log every flight off the North Runway as a direct complaint from me. The fact that I have to live with the stress & health issues from the aircraft noise and to then be expected to spend the entire day to log a complaint using your current system is entirely not possible or realistic.

I appreciate your understanding on this matter and trust you will log my noise complaints in full.

Sincerely
Patrick Courtney



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.

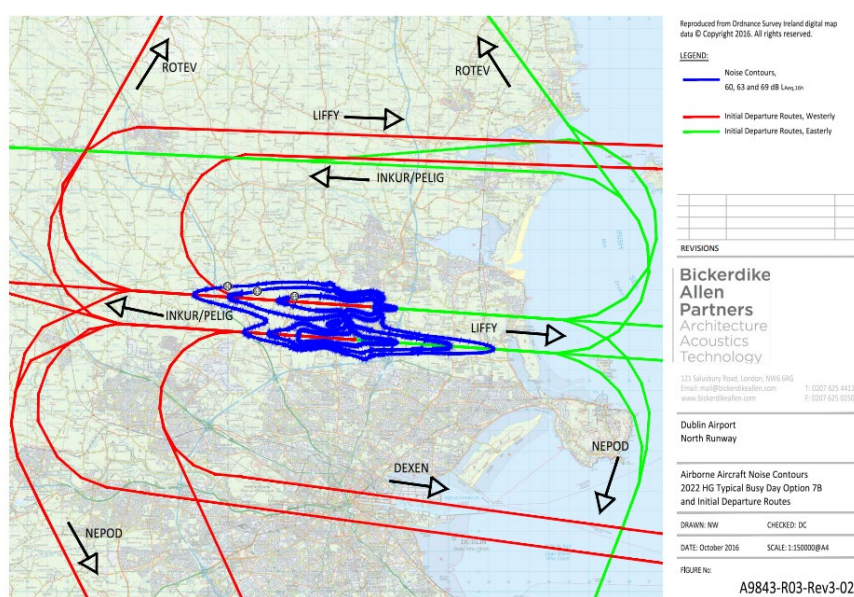
In conclusion I request that permission is refused for this relevant action application on the basis that it will seriously impact on the health of communities closest to the airport and adequate mitigation has not been provided by the applicant.

I also support the request for an Oral Hearing.

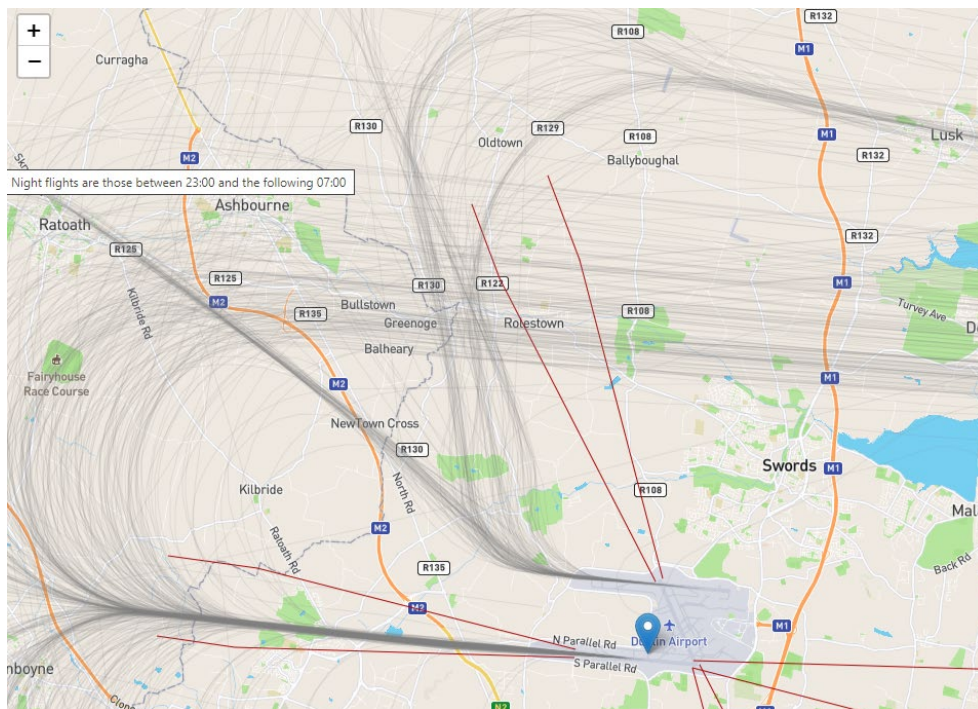
Further background information to many of the questions raised above can be found in the following sections.

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



- 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.



Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

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Co Dublin.

RE: An Bord Pleanala reference ABP-314485-22 Relevant Action at Dublin Airport

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This is most upsetting to us as we were never notified that this planning application involved the changing of flight paths that would affect our home. All maps we looked at to date excluded us from any of this. How can this happen without a public notice being provided to warn us of such an event.

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Up until the opening of the North Runway we had no aircraft noise and now the elevation is very significant and profound as there was very little noise in this rural location.

Thank you for your help

Yours Sincerely

Claire and Niall Smith

Dated. 27-3-24

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Teresa O'Dowd

Dated. 27-3-24

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Thank you for your help

Yours Sincerely

Michael McFadden
Gráinne McFadden

Dated. 27-3-24

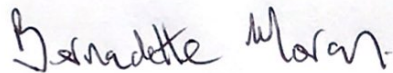
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Thank you for your help

Yours Sincerely,

A handwritten signature in dark ink, appearing to read "Bernadette Moran". The signature is written in a cursive, flowing style.

Bernadette Moran

Date: 28 March 2024

28 March 2024
Bernadette Moran,
The Cottage
Toberburr
St Margarets
Co Dublin

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
Co Dublin.

**RE: An Bord Pleanala reference ABP-314485-22 Relevant
Action at Dublin Airport**

Dear Liam

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Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
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Thank you for your help

Yours Sincerely

Graham Byrne

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Dated. 30/03/2024

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Thank you for your help.

Yours Sincerely

Sign:



MR OFFIAH

Date:

31.03.2024

Address:

LINUS & MEG OFFIAH,
AVALON, NEWTOWN CROSS,
THE WARD,
CO. DUBLIN
D11 X050
0868123216

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

RE: An Bord Pleanala reference ABP-314485-22 Relevant Action at Dublin Airport

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St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

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Thank you for your help

Yours Sincerely

Peter & Betty REDDIN
THORNTON
KILGALLAGHAN
CO. DUBLIN
K67TN20

Dated.

1/4/2024

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
Co Dublin.

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Every 90 seconds a large aircraft flies directly above our home,(see image's inserted on the next page) the noise is unbearable inside and outside of our home . Our home life is disturbed as we can't watch the TV in peace , never mind to think that we cannot enjoy our garden anymore as it is as you simply cannot hear yourself speak outdoor due to the noise of the aircraft's throughout the day . Some nights they fly as it is up until 12am and begin again at 6am -an alarm clock we never wanted. To think that they could now operate throughout the night is not even worth imagining as our sleep is already disturbed . It is simply just so unfair and extremely upsetting .

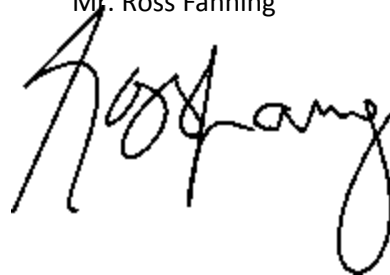
Thank you for your help

Yours Sincerely,

Ms. Shauna Forman

A handwritten signature in black ink, appearing to read 'Shauna', with a long horizontal flourish extending to the right.

Mr. Ross Fanning

A handwritten signature in black ink, appearing to read 'Ross Fanning', with a large loop at the end of the last name.

Of Coolquay Common, The Ward , North Co. Dublin , D11 X95X

Date : 22nd March 2024





Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

RE: An Bord Pleanala reference ABP-314485-22 Relevant Action at Dublin Airport

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Thank you for your help

Yours Sincerely

Mare Gormley
Thorn
Kilsallaghan
Co Dublin
K67 EO C2

Dated.

2/4/2024

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

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Thank you for your help

Yours Sincerely *Stephen MADDigan*

*Thomas
Kilsallaghan
Co Dublin*

Dated. *30/03/2024*

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
Co Dublin.

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Yours Sincerely

Helen Keenan

Dated. 0104 2024

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

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Yours Sincerely

Sign: D. Whelan

Date: 1/4/24

Address: New Cottage, Coolquay, the ward, Co Dublin

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

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Thank you for your help.

Yours Sincerely

Sign: Ben Wilson

Date: 1/4/24

Address: New Cottage, Coolatunty East, Tulla Ward, Co. Dublin

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

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Yours Sincerely

Sign: _____



Date: _____

1/4/24

Address: _____

New Cottage, Coolquay, The Wards, Co. Down.

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

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Thank you for your help.

Yours Sincerely

Sign: Mary Dowling

Date: 28-3-2024

Address: Boolegray The Ward Co-Dublin

D11TH64

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

RE: An Bord Pleanala reference ABP-314485-22 Relevant Action at Dublin Airport

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Yours Sincerely

Sign: Barbara O'Neill

Date: 28/3/2024

Address: Cool Quay The Ward Co Dublin

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

RE: An Bord Pleanala reference ABP-314485-22 Relevant Action at Dublin Airport

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Thank you for your help.

Yours Sincerely

Sign: _____

[Handwritten signature]

Date: _____

28/3/24

Address: _____

KILCOKAN, THE WARD, CO. DUBLIN. D11E519

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
Co Dublin.

RE: An Bord Pleanala reference ABP-314485-22 Relevant Action at Dublin Airport

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Thank you for your help.

Yours Sincerely

Sign: Ann Kane

Date: 28/3/'24

Address: Kilcoskan, The Ward, Co Dublin.

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

RE: An Bord Pleanala reference ABP-314485-22 Relevant Action at Dublin Airport

Dear Liam

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Thank you for your help.

Yours Sincerely

Sign: Mary O'Connor

Date: 28-03-2024

Address: Coolquay Nurseries The Ward Co. Dublin.
D11 AC92

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
Co Dublin.

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Yours Sincerely

Sign: Michael O'Connor

Date: 28/3/2024

Address: Coolquay Nurseries The Ward Co Dublin D11AC92

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St Margarets The Ward Residents Group
The Ward Cross
The Ward
Co Dublin.

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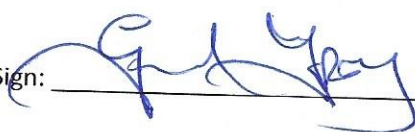
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Yours Sincerely

Sign: _____

Date: 28/3/24

Address: COOLATRATH, THE WARD, G. Durbin
D11 VY23

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

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Yours Sincerely

Sign: David Long

Date: 28/3/21

Address: Coolatnath, The Wood, Co. Dublin

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
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Yours Sincerely

Sign: Cora O'Donoghue

Date: 29/03/24

Address: Coolquay Common, the warch. D17C434

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
Co Dublin.

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Yours Sincerely

Sign:

Andrew Mays

Date:

29/3/24

Address:

Coolguay Commons, The Ward D11C437.

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
Co Dublin.

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Yours Sincerely

Sign:

Paul Lysa

Date:

29/3/2024

Address:

COOLATONIA TALK WARD CO BELLS

DU ER 20

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
The Ward
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Yours Sincerely

Sign: Bernadette Stenson

Date: 29/3/2024

Address: Coolatrath The Ward Co Dublin D11 EE65.

“Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
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Dated 1st April 2024

Mr Liam O Gradaigh

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Yours Sincerely

Sign: Paul McLean

Date: 01 April 2024

Address: Castle Farm, Kiltallaghan, Co. Dublin

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

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Yours Sincerely

Sign: Paul Nolan

Date: 1 April 2024

Address: Fair Green, Globe rd, Kilsallaghan, Co Dublin K67V827

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Sign: Paul Shan

Date: 01 April 2024

Address: Shallon, The Ward, Co Dublin.

Mr Liam O Gradaigh

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The Ward Cross

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Thank you for your help.

Yours Sincerely

Sign: Paul Nolan

Date: 01 April 2024

Address: Newtown Cross, The Wood, Co Dublin, D11A590

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

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Yours Sincerely

Sign: Finbar O Mahony Date: 30-3-2024

Address: The Rath Kilsallaghan Co Dublin

PAULINE O' MAHONY

SHARON O' MAHONY

KEVIN O' MAHONY

Mr Liam O Gradaigh

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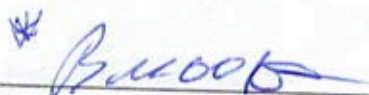
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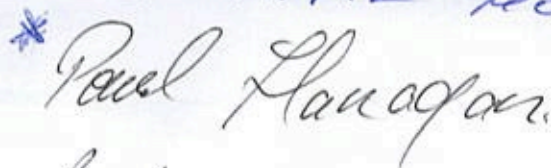
Sign: _____

Date: 28/3/24

Address: NEWTOWN TIRE WARE CO Dublin D11 XY22

CAROL MOORE

LISA MARIE MOORE



Loisleen Walsh

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

Co Dublin.

RE: An Bord Pleanala reference ABP-314485-22 Relevant Action at Dublin Airport

Dear Liam

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Up until the opening of the North Runway we had no aircraft noise and now the elevation is very significant and profound as there was very little noise in this rural location.

Thank you for your help.

Yours Sincerely

Suzanne O'Reilly

Sign: James O'Reilly

Date: 29/3/2024

Adam O'Reilly
Kenna O'Reilly

Address: NEWTOWN, THE WARD, Co Dublin

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

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Yours Sincerely

Sign: Carol Moore.

Date: 29-3-2024.

Address: NEW TOWN, THE WARD, D11XY22.

Carol Moore,
Bert Moore,
Lisa-Marie-Moore,

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

The Ward

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Yours Sincerely

Maureen O'Sullivan

Sign: Joan O'Sullivan

Date: 30/3/24

Address: THE RATH FARM, KILSALLAGHAN, Co MEATH.

K67F3P1

Joanne O'Sullivan 30/3/24

*Braentley Cottage,
The Rath Farm,
Kilsallaghan/
Co Meath
K67PX61*

*The Loft
The Rath Farm
Kilsallaghan
Co Meath
K67A069*

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Yours Sincerely

Sign: Christina Dolan

Date: 30-3-24

Address: Davon, Newtown Commons, the ward, cookway
D11 HN 90

Mr Liam O Gradaigh

St Margarets The Ward Residents Group

The Ward Cross

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Yours Sincerely

Sign: City M Gup -

Date: 30th MARCH 2024.

Address: THE RATH COTTAGE, KILSALLAGHAN, CO. DUBLIN. K67 E006.

MICHAEL MCGUIGAN

ADAM MCGUIGAN

RUTH MCGUIGAN

ANN MARIE LAUER

HEBE MCGUIGAN

Mr Liam O Gradaigh

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Yours Sincerely,

Sign:

Christy Gavin

Date:

28/3/24

Address:

Marshall The Ward Co Dublin D11DE63

FRANCES THOMAS
Coolquoy
The Ward
Co Dublin
D11 HX97.

Mr Liam O Gradaigh
St Margarets The Ward Residents Group
The Ward Cross
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Yours Sincerely

Frances Thomas

Dated. *30th March 2024*

APPENDIX B
PLANNING REPORT

Hendrik W van der Kamp, MScEng, FIPI, MIEI
Town Planner
1, Woodstown Court
Knocklyon
Dublin 16
Tel: 087 2020387 E-mail: hendrikwvanderkamp@outlook.com

Observation on Additional Information Submitted on 4th March 2023 in relation to the application for a Proposed Relevant Action under Section 34C of the Planning and Development Act, 2000 (as amended).

This observation is in response to the invitation for submissions or observations in relation to Additional Information that has been submitted on behalf of the applicants in relation to an application for a Relevant Action under Section 34C of the Planning and Development Act, 2000 (as amended).

The application has pl. ref. no. **F20A/0668**, appeal reference **ABP-314485-22**.

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3	Number of Houses Affected by the Changed Flight Paths	2
4	Eligibility Status of Development on Zoned Land in Rural Villages	2
5	Conclusions	3

1 Introduction

This observation is in response to the invitation from An Bord Pleanála for submissions or observations on a response document that was received from the applicants in relation to an application for a Relevant Action under Section 34C of the Planning and Development Act, 2000 (as amended). A decision to grant permission for this application has been appealed to An Bord Pleanála.¹

The response document relates to a request from An Bord Pleanála to the applicants to:

...”submit additional maps which would allow the Board to undertake an assessment of any comparison with Eligibility Contour Area maps in Fig 3.1 and Maps 1-23 of the Regulatory Decision, and the noise contours now proposed. The revised maps shall clearly illustrate all authorised habitable dwellings within the 55 dB Lnight and 63 Lden contour for the year 2025.”²

The applicants’ agents have submitted a large number of maps in response to this request in the form of four packs.³

This observation is in response to Map Set 4: Comparison Maps 1-28 Eligibility Contour Areas with consented properties insulated by planning condition or insulation scheme (1:7,500 Scale - Aerial Base). This observation should be read in conjunction with the original submission that was made in relation to the relevant action appeal.

2 Changed Flight Paths

The maps that have been submitted by the applicants confirm that flight paths have changed since the original planning permission for the Northern Runway was granted. The submission that was made on behalf of my clients⁴ was therefore correct in stating that a change in flight paths since the original planning permission have had profound consequences for the noise contours in the area, particularly to the west and north west.

There is no reference in the relevant action application to the fact that these flight paths may be different to the flight paths on which the original EIAR was based that formed the basis for the planning permission for the Northern Runway. This is significant because the existing planning permission states in condition 1 that the operation of the airport runway must be in accordance with the EIAR, i.e. the 2004 EIAR.⁵

The maps confirm that the EIAR supplement has adopted different flight path assumption to the ones used in the planning application on which the permission is based. This results in a distribution of noise impacts that is different from the original

¹ Planning ref. F20A/0668, appeal reference ABP-314485-22

² Letter An Bord Pleanála 13/2/24.

³ Letter dated 4/3/24 Tom Phillips and Associates.

⁴ Observation on Additional Information Submitted on 14th September 2023 in relation to the application for a Proposed Relevant Action under Section 34C of the Planning and Development Act, 2000 (as amended).

⁵ An Bord Pleanála Order PL06F.217429, Condition 1.

planning permission. As a result, the pattern of additional awakenings is also likely to be distributed in a different pattern than as permitted under the planning permission.

3 Number of Houses Affected by the Changed Flight Paths

The reason for the request from the Board for the additional information in the form of the maps is clearly to determine the number of houses that have been and will be affected by the changes in the flight paths from the flight paths that were originally assumed under the planning permission for the northern runway.

By interpreting the maps that have been submitted by the applicants it is possible to determine the extent of the number of houses that are affected. The changes are clearly of a profound nature as they affect not only a significant number of rural houses in the Fingal county rural area, but also two rural settlements that have been identified in the Fingal county development plan for limited expansion based on accommodating local housing need. Furthermore, the affected area now also includes houses that are within county Meath.

The following areas are affected by the changes in the flight paths as confirmed by the maps that have been submitted by the applicants:

- Map no. 19: Coolquay village
- Map no. 20: small number of isolated houses
- Map no. 21: Rivermeade village
- Map no. 25: small number of isolated houses near Whitecross/R135.

Maps 19, 20, 21 and 25 show the introduction of eligibility for noise mitigation measures of residential development that was previously outside these eligibility boundaries.

4 Eligibility Status of Development on Zoned Land in Rural Villages

The Fingal County Development Plan identifies a number of rural villages as part of the settlement hierarchy. It is an objective of the Development Plan to: ...” *Manage the development of Rural Villages within the RV boundaries and strengthen and consolidate their built form providing a suitable range of housing as an alternative to housing in the open countryside.*”⁶ Four of these villages are located within the Metropolitan Area. These metropolitan Rural Villages comprise Coolquay, Kinsaley, Rivermeade, Rowlestown.⁷ Three of these four villages (Coolquay, Kinsealy and Rivermeade) are located either partly or completely within the Air traffic noise zones as identified in the Development Plan. However, while a small part of the zoned lands of Kinsealy village are located within Airport Zone B, most of Rivermeade and all of Coolquay are within Airport Zone C which is based on lower aircraft noise than zones A and B.

The further information that has been submitted by the applicants in the form of the eligibility maps confirm that the proposed relevant action application introduces an acceptance of noise contour zones that are clearly not permitted under the existing planning permission and that materially contravene the policies for the rural villages in the county development plan.

⁶ *Fingal Development Plan 2023-2029*, Objective CSO68, p. 101.

⁷ *Fingal Development Plan 2023-2029*, p. 141.

The noise contour zones that are shown on the maps submitted by the applicants in response to the request for further information, introduce eligibility for noise insulation measures in or near designated rural villages that are appropriate to noise zones B or A while the development plan policy has identified that the noise zones for these villages are generally noise zone C (with the exception of a small section of zoned land in Kinsealy village).

As both Coolquay and Rivermeade settlements are designated in the Development Plan as Rural Villages, this contradiction between the noise contours as submitted in the response to the additional information request and the Development Plan noise zones, can clearly not be correct in planning terms.

5 Conclusions

- **The maps that have been submitted by the applicants in response to the request for further information confirm that the flight paths that are assumed under the relevant action application are different to the permitted flight paths under the existing planning permission.**
- **To delete or amend conditions 3.d and 5 that are attached to the planning permission for the airport operation without reviewing the planning permission in full, is a matter of concern. Attaching the conditions was a critical aspect of the decision by An Bord Pleanála to grant planning permission for the Northern Runway.**
- **The maps confirm that the EIAR supplement has adopted different flight path assumption to the ones used in the planning application on which the permission is based. This results in a distribution of noise impacts that is different from the original planning permission.**
- **The maps confirm that the different flightpaths that have been adopted in the EIAR Supplement will have a consequence for the noise contours, compared to the 2004 EIAR that formed the basis for the planning permission.**
- **The proposed development introduces noise contour zones in proximity of the rural villages that are appropriate to noise zones B or A while the development plan policy has identified that the noise zones for these villages are generally noise zone C.**
- **The change in flight paths has resulted in a breach of the existing planning permission in that the applicants can no longer satisfy condition 1 of the planning permission in that the operation of the runways is not as per the EIAR. No revised planning application to change the flight paths has been granted permission.**

APPENDIX C
REQUESTS FOR ADDITIONAL INFORMATION FROM FINGAL COUNTY COUNCIL
AND ANCA



Aiden O'Neill,
Coakley O'Neill Town Planning Ltd
NSC Campus Mahon, Cork
T12 H7AA

PLANNING & DEVELOPMENT ACT 2000, AS AMENDED

Decision Order No. PF/0451/24	Decision Date 16 February, 2024
Register Ref. F23A/0781	Registered 15 December, 2023

Area Swords

Applicant DAA PLC
DAA PLC

App. Type Permission

Development

EIAR & NIS

The proposed development relates to the entirety of the Airport including greenfield sites on the periphery of the Airport, as well as parts of adjoining public roads, including the Airport roundabout; the R132/Corballis Road South; R132/Old Airport Road; and R108/Old Airport Road.

Development Description/ the proposed development will consist of:

Increase in passengers numbers per annum

a) An increase in the capacity of the airport from the permitted combined capacity of Terminal 1 together with Terminal 2 of 32 million passengers per annum (32mppa) (as referenced by condition no. 3 of ABP Ref. No. PL06F.220670 (F06A/1248) and condition no. 2 under ABP Ref No. PL06F.223469 (F06A/1843)) to 40 million passengers per annum (40mppa). b) The increase to the capacity will include all attendant airport operations at Dublin Airport. The proposed increase in passenger numbers will supersede and replace condition no. 3 of ABP Ref. No. PL06F.220670 (F06A/1248) and condition no. 2 under ABP Ref. No. PL06F.223469 (F06A/1843). The provision of airport infrastructure to include the following Project Elements, namely:

Project Element 1: North Apron

a) Demolition of existing buildings on site including the North Terminal Building, Hangar 1, Hangar 2, Hangar 3, the 'SIM' Office Building, a substation and storage building (total demolition c. 35, 307m²) b) The construction of an extension ('Module 1') (c. 12, 799.49m²) to Pier 1 at Terminal 1, which will comprise a two-storey structure with arrivals facilities at ground floor level and departure facilities at first floor including boarding gates, circulation and waiting areas, food and beverage facilities, retail space, toilets and welfare facilities, and ancillary back-of-house facilities, as well as ancillary offices, staff welfare, IT rooms, stores, plant, and a substation. c) 2no. jet bridges, and 3 no. MARS (Mixed Apron Ramp System) stands, of which 2no. will have fixed links and nodes. d) The proposed extension to the passenger pier will

be connected to the existing Skybridge via a new Vertical Circulation Core (VCC) (c. 751.59m²), and the internal flows in the Skybridge will be reversed. e) The existing Immigration Hall and Pier 1 interfaces with the existing Skybridge will require amendments to the existing Immigration VCC (c. 268.67m²) and localised widening of the Skybridge on its eastern side. f) New substations including a new external substation referred to as Substation 43 (c. 87.63m²), and a new substation located on the ground floor of Module 1 (c. 141.79m²). g) Relocation of the entrance to the existing Platinum Services facility and associated internal amendments. h) A new airside service road is proposed to the south of the proposed pier extension, beneath the skybridge and beside the Old Central Terminal Building (Protected

Structure (RPS 612)). i) Associated development including a new airside service road to the south of the proposed pier; relocation of the airside/landside fence; landscaping and drainage works, including diversions of existing services.

Project Element 2: South Apron

a) Enabling works comprising the demolition of existing buildings (c. 29, 101.2m²), to include Cargo Terminal 1 (c. 10, 446m²), Cargo Terminal 2 (c. 5, 445m²), the existing Passenger Boarding Zone (PBZ) (c. 2, 209m²), Shamrock House Annex and Link Bridge (c. 2, 509m²) and Gate Gourmet (c. 2, 473m²) and service diversions. b) The construction of a new 3-storey pier (Pier 5) (c. 24, 070m²) projecting eastward from the existing Terminal 2 building and incorporating 8NBE stands, six bus lounges, enclosed gate-hold rooms, fixed links, with the capacity for both airbridge and walk in / walk out boarding / disembarkation. c) A reconfiguration & expansion of the existing US Customs and Border Protection (CBP) pre-clearance facility, which will consist of: (i) the demolition of: 2no. existing Pier 4 link bridges; 2no. external vertical circulation cores (VCC) and 2no. airbridges; part of the north, east and south elevations of the existing CBP facility (c. 309m²), including external footpaths, ramps and handrails; and part of the existing apron pavement. (ii) internal reconfiguration of

part of Pier 4 and the existing CBP facility (c. 1, 017m²) and the construction of an expanded 2-storey, part 3-storey CBP facility to the east of the existing CBP facility (c. 8, 203m²), to include: a. pre-clearance passenger processing facilities at Level 10 (ground floor), including 5no. entry Egates, queuing areas, 11no. screening lanes, 22no. booths, transit lounge area, welfare facilities, and ancillary staff facilities. b. lounge, retail/food and beverage area, swing gateroom, welfare facilities, airline lounge, staff facilities, including ancillary offices at Level 15 (first floor). c. construction of 2no. external vertical circulation cores (VCC). d. construction of a new skybridge links at Level 15 (first floor) Level 20 (second floor) and Level 30 (third floor) between the proposed Pier 5, and the existing Pier 4 and the existing Terminal 2 building and all associated works. e. security facilities at Level 10 and Level 20, and a lift core extending to Level 30 (third floor (part)), to merge with the remaining parts of the existing facility at Pier 4. f. ancillary external structures to the extended roof, including rooflights, external balustrade and handrail; fixed metal roof walkway; and fall protection anchorage system. g. realignment of the existing airside road; the provision of new airside road; and the provision of pedestrian walkways and zebra crossings. h. the reorganisation of an existing airside operations car parking area to provide 15no. airside operations car parking spaces; the provision of 2no. PRM airside operations parking spaces, 2no. platinum passenger parking spaces, 2no. GIWA (goods vehicles) spaces, and 2no. bus set down areas. i. decommissioning of 2no. existing operational aircraft stands. d) the partial demolition (c. 3, 320m²), refurbishment and upgrade of the existing 2-storey former Flight Catering Building, to become the South Apron Support Centre (SASC) (c. 4, 139m²) which, together with its existing external hardstanding area to the north-west of the SASC, is to be used initially as a temporary construction compound (office storage and a pre-screening/ logistics/ staff welfare facilities) for the proposed works to the CBP facility, and then for continued use as an Airport Operational Building for airside support/operations, which will consist of: (i) upgrade of the façade of the existing SASC building, to include partial demolition of the later attritions/extensions to the south and west flanks of the building; demolition of the

existing pedestrian link bridge to Shamrock House to the east (making good the elevation of Shamrock House to match the existing), and demolition of an existing substation internal to the building. (ii) the refurbishment of the remaining SASC structure to provide offices, meeting rooms, staff welfare facilities, storage and plant rooms on the ground and first floors, and refurbished rooftop plant enclosure and new rooftop balustrades (c. 4, 139m²), as well as an external dining courtyard at ground floor. (iii) the provision of 10no. visitor car parking spaces, 2no. PRM visitor car parking spaces and 80no. cycle storage racks. (iv) revised external pedestrian and vehicular circulation arrangements. (v) separate external smoking shelter and separate external bin storage. e) new part 2-storey Gate Post 4 (c. 431m²), with associated roads and civil works. f) A remote Passenger Boarding Zone (PBZ) (c. 2, 198m²), with a capacity of 9NBE stands and an extended dual Code E taxi-lane. g) Associated infrastructure works including airfield and general services, surface water attenuation and pollution control, including the reconfiguration of a section of the Cuckoo stream.

Project Element 3: Terminal 1 Central Search

a) The construction of an extension to an existing internal Level 30 mezzanine level in Terminal 1 (c.1, 200m²) to accommodate a relocated Central Search Area (CSA). b) Realignment of the southern external façade line outward to allow for circulation space behind the security lanes. c) A new vertical circulation core (VCC) from level 30 mezzanine to level 20 International Departure Lounge, comprising lifts, escalators and stairs, and rooflighting. d) New office and operational support spaces, and conversion of the redundant central search area on Level 20 to provide 2no. 'Fast Track' security lanes and 1no. new Staff Search security lane, at Level 20. e) Security Processing Equipment at Level 30, to include a pre-screening queue management area, 16no. new Autopass gates (8no. at either side of the CSA) and 11no. 25m long ATRS (automatic tray return system) security screening lanes and body scanners.

Project Element 4: New Apron 7

a) The demolition of 6no. habitable houses, the removal of existing hedgerows, and development of a new remote Apron 7 to the north-west of the airport campus with attendant taxiway access. b) 9no MARS or 18no. Code C remote stands distributed in two cul-de-sacs; and 5no. Code C remote stands. c) single-storey electricity substation (c. 165m²) and single-storey dispatch building (c. 55m²). blast screen (to the south) and realignment and cul-de-sac-ing of the R108 public road. d) new Code F parallel taxiway and taxiway links to taxiway Mike and Apron 7. e) The development of Apron 7 will necessitate the severance and cul-de-sacing of the R108.

Project Element 5: Underpass beneath Runway 16/34 (Underpass)

a) the construction of a subterranean Underpass of Runway 16/34, which will comprise: (i) A twin-cell enclosed tunnel with 2 no. lanes in each direction, linked to the surface by ramps, portals, and light attenuation screen (1.8m in height above existing ground level at the west ramp and 3.3m in height above existing ground level at the east ramp). The enclosed section will be approximately 0.7 km long, with an overall alignment of approximately 1.1 km in length from top of ramp to top of ramp. It will be approximately 24m in external width, and approximately 5.5m in internal height from road to tunnel ceiling. It will be up to 17.5m below existing ground level. (ii) Plant room, of approximately 625m², which will comprise housing for transformers, pumps, controls and communications equipment, located underground at the portal of the east ramp, a parking layby and utilities corridor crossing. (iii) Demolition (approximately 23, 741m²) and reinstatement (approximately 16, 216m²) of part of the pavement surfaces of Apron Taxiway 4, Taxiway F-2, Runway 16/34 (the crosswind runway), Taxiway W1 and W2, and the West Apron. (iv) Access roads to tie in with the existing airside road network at each end of the proposed Underpass (at Pier 3 on the Eastern Campus and the West Apron on the Western campus respectively), and 31no. car parking spaces at surface level at Pier 3. (v) Demolition (approximately 97m²) of fixed links (elevated enclosed passenger walkways leading from the Pier to Aircraft Nodes) and Nodes (structures

which provide support for the fixed links and internal pedestrian access cores to ground level) serving 3no. aircraft stands and associated airbridges (passenger boarding bridges) at Level 20 (departure gates) of Pier 3. To the south of Pier 3, an existing airbridge is to be removed and an existing fixed link is to be adjusted to service existing stands in that area. (vi) Replacement of the demolished fixed links and nodes with 3no. new fixed links, A (approximately 356m²), B (approximately 227m²) and C (approximately 170m²) and of approximately 150m, 95m and 70m in length respectively and approximately 2.2m in width and approximately 3.2m in height, at a maximum height of approximately 7.1m above the surrounding apron; 3no. two-storey Nodes A, B and C, approximately 157m² , 154m² and 148m² in area respectively; and 2no. airbridges (1no. at Node A and 1no. at Node B). (vii) Modifications to the elevations of Pier 3 at Level 20 to accommodate the links and airbridges, including part replacement of the existing glazing with new glazing/cladding, and a new cladded portal with new doors and access control at each new fixed link location; rearrangement of part of the internal floorspace of Level 20, including a new partition between the entrance/ exits of proposed fixed links A and B; new surface water drainage network; and 31no. car parking spaces at surface level; (viii) Realignment of stands on the Eastern Campus resulting in the net loss of three Narrow Body Enabled (NBE) stands and net gain of one Wide Body (WB) stand at Pier 3. b) Realignment of aircraft stands in the West Apron (involving rearranging /relocating stands by way of new paint markings on the apron pavement) to accommodate the portal and Underpass access roads (no net change in number of stands). c) Modifications to existing drainage network in the vicinity of the proposed Underpass including replacement of existing attenuation system, and construction of a new drainage network for the proposed Underpass, including sump pit with pumps, interceptors, and new attenuation tank. d) Temporary diversion of the Airfield Trunk Culvert during construction, and its reinstatement at the existing alignment and level. e) Realignment of stands at Pier 2 on the Eastern Campus (no net change in number of stands). f) All ancillary airport infrastructure including additional apparatus/equipment including

jet blast fencing, Fixed Electrical Ground Power (FEGP), Advanced Visual Docking Guidance System (AVDGS), Stand Number Indicator Board (SNIB), Fuel Hydrants, High Mast Lighting (HML), electrical charging facilities, and miscellaneous ground service equipment (GSE) parking and storage areas.

Project Element 6: Airfield Drainage Project

a) upgrades to existing drainage infrastructure and construction of additional drainage infrastructure to provide an integrated and improved surface water management at Dublin Airport, and will consist of: (i) a contamination detection and response (CD&R) system comprising detection devices, network decision points (DPs), control kiosks, and ancillary infrastructure including local access roads, local drainage and communications and power ducts. (ii) clean water supply pipelines consisting of large diameter trunk pipelines. (iii) airfield contaminated pipelines consisting of large diameter trunk pipelines. (iv) upgrades to the West Apron surface water collection network including reconfiguration of the existing network, construction of an underground attenuation tank, installation of a local CD&R system, network DPs and control kiosks, construction of an underground pollution storage tank, a pumping station, and ancillary development including local ductwork, local access roads and local drainage. (v) upgrades to the existing surface water collection network in the vicinity of the South Apron including reconfiguration of the existing network, construction of network DPs, upgrade of the existing flow diversion structure (FDS) and reconfiguration of the existing Cuckoo supply channel. (vi) a central pollution control facility (CPCF) consisting of underground pollution control storage tanks, a pumping station, a discharge pipeline to the Uisce Éireann network, mechanical and electrical equipment, a control building, an electrical substation, and ancillary development including a local access road, local drainage, and ducting. (vii) a CPCF pipeline consisting of a large diameter trunk pipeline. (viii) a central supervisory control and data acquisition (SCADA) system comprising kiosks and associated electrical power and signal connections. (ix) repurposing of the central section of the existing

Airfield Trunk Culvert (ATC) as a contaminated pipeline. (x) additional flood alleviation measures downstream of the airfield to provide additional flood resilience. (xi) Cuckoo Stream naturalisation measures downstream of the airfield to improve habitat quality and facilitate further improvements in water quality. (xii) ancillary and associated development including pipework, mechanical and electrical service connections and upgrades, and site development works.

Project Element 7: Ground Transportation Centre

a) Reconfiguration of the existing Ground Transportation Centre to provide additional bus bays (29no. in total) in a new Drive-In, Reverse-Out (DIRO) arrangement. b) Ancillary development, to include a dedicated bus only lane; bus only recirculation route; general traffic/bus bypass lanes; short-term bus layover at the site of the current coach park; improved long-term layover facilities at the Express Red Long-Term Car Park; pedestrian waiting area and revisions to pedestrian circulation routes.

Project Element 8: Terminal 2 MSCP Extension a) The development consists of the upward extension of the Terminal 2 Multi-Storey Car Park at Dublin Airport by 2 levels (i.e., from 6 levels to 8 levels) to provide 654 no. additional permanent short-term car parking spaces, and all associated ancillary infrastructure and facilities including extending the existing stair cores, the provision of 3 no. new lift shafts, new generator compound, lining of new car parking spaces, and the extension of 2 no. external ramps. b) The proposed development will include the provision of 26no. eCar charging spaces, and all site development, drainage, lighting, signage, CCTV and landscaping works. c) Temporary construction measures including the provision of a welfare facility on the existing level 3.

Project Element 9: Long Term Car Park (Red)

a) Construction of an extension of the Express Red Long Term Car park to provide for an additional c. 1, 871no. long term car parking

spaces on a temporary basis for either 10 years, or once MetroLink becomes operational, whichever is the sooner, to include 91no. PRM spaces and 100no. fitted with EV charging points, and all ancillary infrastructure and facilities including new internal circulation road, footpaths, pedestrian crossings, roundabouts, bus routes and 8no. shelters, upgrade of existing welfare facilities. b) The existing Access Point to the Express Red Car Park is to be utilised with access into the carpark via the existing internal red car park North South Parallel Road. c) New surface water drainage system works. d) The erection of CCTV equipment, security fencing, electrical enclosure, lighting, signage, and boundary fencing. e) All other associated site development works, including all hard and soft landscaping.

Project Element 10: Staff Car Park North

a) the construction of a new surface car park which will comprise 700no. airport staff car parking spaces, of which 30no. will be provided for PRM and 18no. will be serviced by EV charging points, to be accessed off the Castlemoate Road via a new entrance including the provision of a right-hand turning lane on Castlemoate Rd; b) new two-way cycle path along the east side of Castlemoate Rd from Corballis Rd to the Naul Rd c) new two-way cycle path to the south of the proposed car park connecting the proposed cycle path on Castlemoate Rd to the existing cycle path on the R132, access to be controlled via security gates. d) 40no. bicycle spaces. e) new bus stop layby on the east side of Castlemoate Rd including 1no. new bus shelter (c. 29.85m²). f) new internal road layout, with footpaths, incorporating culverting of the existing east-west drainage ditch. g) security barriers at the new car park entrance. h) new surface water drainage system works incorporating attenuation. i) the erection of CCTV equipment, security fencing, electrical enclosure, lighting, signage, and boundary fencing; and j) all other associated site development works, including all hard and soft landscaping, on a site of approximately 3.1 hectares.

Project Element 11: Junction Improvements :

a) Upgrade of junctions in the vicinity of the airport to provide additional bus priority capacity, including: (i) R132 / M1 Link Airport Roundabout: o Introduction of additional bus priority measures for E-W bus/coach movements between the Airport & the M1 link. o Optimisation of traffic signals in relation to all bus movements, i.e., north-south on the proposed BusConnects Swords Core Bus Corridor (CBC) (ABP-317121-23) and east-west between the Airport and the M1 link. (ii) R132 / Corballis Road South: o Ahead lane from Corballis Rd South to Express Red Long-Term Car Park to become ahead and right. (iii) R132 / Old Airport Road: o Additional right turn bus lane from R132 (N) to Old Airport Road (W). o Additional left filter bus lane from Old Airport Rd (W) to R132 (N). (iv) R108 / Old Airport Road: o Additional left turn bus lane from R108 (N) to Old Airport Road (E). o Optimisation of traffic signals and lane markings to prioritise bus movements (E-N). (v) Corballis Road North/Corballis Avenue: o Introduction of lane destination markings. (vi) Corballis Road North/Recirculation Link: o Conversion of internal recirculation link to bus, taxi and Authorised Vehicles only, with link into wider bus priority measures. o Additional bus priority on Corballis Road North to link to bus priority improvements at exit from Airport Roundabout

Overall, the proposed development will result in a loss of 4no. Narrow Body Equivalent (NBE) stands (2no. at Pier 3 and 2no. at Pier 4), however there will be an overall net increase of 33no. NBE stands across the airfield resulting in a total capacity of 167no. NBE. The proposed development will also supersede and replace condition no. 23 of ABP Ref. No. PL06F.220670 (F06A/1248) in respect of short-term, long-term and staff parking as follows: (a) The total number of long-term public car parking spaces serving the Airport shall not exceed 28, 671 spaces. (b) The total number of short-term public car parking spaces shall not exceed 4, 654 spaces. (c) The total number of staff car parking spaces shall not exceed 5, 360 spaces. The proposed development site includes an establishment to which the European Communities (Major Accident Hazards involving Dangerous Substances) Regulations 2015 apply. For the avoidance of doubt, the proposed

development does not intend to modify the existing establishment to which the European Communities (Major Accident Hazards involving Dangerous Substances) Regulations 2015 apply (Fuel Farm).

The proposed development site also includes activities covered by an existing Industrial Emissions Licence (P0480- 02: Hangar 1 and 5) and Integrated Pollution Control Licence (P0921-01: Hangar 3) issued by the Environmental Protection Agency. For the avoidance of doubt, the proposed development does not intend to modify either the Industrial Emissions Licence, the Integrated Pollution Control Licence or the premises covered by the licences. The proposed development consists of the carrying out of works in the curtilage of 3no. Protected structures, the Old Central Terminal Building (RPS 612); Church of Our Lady Queen of Heaven (RPS 864); and Castlemoate House (RPS 611).

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the proposed development and will be submitted to the planning authority with the application.

The planning application is accompanied by an Environmental Impact Assessment Report (EIAR). The planning application and EIAR may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy at the offices of the Planning Authority during its public opening hours. Fingal County Council, Fingal County Hall, Main Street, Swords, Fingal, Co. Dublin (to inspect Planning Applications on all lands). Opening Hours 9.30 - 16.30 Monday - Friday. (Cash Office opening hours are 9.30 to 15.30 p.m.). A submission or observation in relation to the Application may be made in writing to the Planning Authority on payment of a fee of €20, within the period of 5 weeks, beginning on the date of receipt by Fingal County Council of the Application, and such submissions or observations will be considered by the Planning Authority in making a decision on the application. The Planning Authority may grant permission subject to or without

conditions, or may refuse to grant permission

Dublin Airport Co. Dublin in the townlands of Millhead, , Kilreesk, Kingstown, Dunbro, Barberstown, Pickardstown, Portmellick, Forest Great, Forest Little, Cloghran, Collinstown, , Corballis, Coultry, Commons Rock, Harristown, Siloge, Huntstown, Shanganhill, Sandyhill, Dardistown, Stockhole, and Toberbunny.

Location Dublin Airport Co. Dublin

Dear Sir/Madam,

With reference to your planning application received on 15 December, 2023 in connection with the above, I wish to inform you that before the application can be considered under the above mentioned Acts, six copies of the following **additional information** must be submitted:

1. In order to support the principle of the proposal the applicant is invited to submit a comprehensive assessment demonstrating that the location and design of each proposed development, including construction of the underpass, do not prejudice future strategic development options or compromise the future realisation of the full airfield capacity which may be determined in future reviews of 2018 Future Capacity Needs in accordance with National Aviation Plan action 4.4.1. The locations for a new third terminal as referenced in section 7.25 and objectives EI03 and TP03 of the Dublin Airport LAP, Section 5.4.2 of the DTTAS 2018 review and in compliance with DA01, DA02 of the Fingal Development Plan will form a critical consideration in the assessment.
2. The Planning Authority has concerns as to the various baselines and surveys of historical and current operations/current state as they are presented in the application and used as basis for trends and forecast scenarios. Therefore, the applicant is requested to submit a list of all the baselines, surveys and current operations that are presented in the application and the raw data. In this regard the applicant is advised that this information should be robust and up to date, for example 2023 in order to provide for a sufficient level of consideration for the Planning Authority to reach a reasoned conclusion.

3. The applicant is applying for a 15 year permission. The project elements that support the application are seen to be implemented over a 10-year period, with the majority of these completing during Years 4 and 5. However, it is not clear within the application as to how the completion of these project elements align with projected growth from 32mppa to 40mppa. There is a clear discrepancy between the phasing, delivery of elements and intensification of use by way of passenger numbers. The Application would benefit from a masterplan led approach, with a coordinated high quality sequential proposals and phasing laid out for how the airport is going to develop in the future, with consideration of the Mid Point Review as expressed in the EIAR and sought by the NTA. Therefore, the applicant is requested to submit justification for the 15 year permission, a revised phasing plan containing sufficient detail to address these matters to facilitate a reasoned conclusion by the Planning Authority.
4. On review of the proposed development and having particular regard to the high quality of elements of the receiving built environment (OTCB and T2 as 2 examples), as noted elsewhere in this report the extent to which the proposal supports policy/objectives of the Fingal Development Plan 2023 -2029 section 8.5.9 DAP10 and DA026 and section 7.7 of the Airport LAP is unclear on assessment. Taking account of concerns raised within individual project assessments the applicant is invited to submit a design assessment supported by photomontages to demonstrate the extent of consideration that has been had to the high quality design aspirations of the above-mentioned plan provisions. Previously raised concerns regarding design quality of the pier amendment, VCC and skybridges forming part of the underpass project should be addressed.
5. The applicant is invited to provide a summary of progress towards compliance with previous planning conditions related to surface access with a particular focus on conditions of the T2 consent (PL 06F.220670) other than condition 3 (32mppa), to demonstrate condition 3 as proposed in context, and to demonstrate the applicants assessment of progress on the other conditions related to surface transport including detailed implementation reports on the Mobility Management Planning measures over time.
6. The applicant is invited to provide analysis with narrative explaining the variation over time, of previously modelled aircraft noise contours for Dublin Airport. The analysis should be accompanied by an overlay graphical representation of noise modelling prepared and presented as contours for the currently proposed development shown with each of the following previously presented contours: 1)

the North Runway application (December 2005 EIS), 2) the consented North Runway (EIS Addendum 9th August 2007) 3) the modelling agreed for operation of the noise mitigation schemes under that permission (2016) 4) the Airport Noise Zones in the Fingal Development Plan 2023. The methodological differences between the various contours and the reasons why they are not directly comparable should be noted.

7. The proposal has not addressed the relationship between the proposal, the intent of the noise contours, and the provisions described in of section 8.5.7 (i) of the Fingal Development Plan and National Policy Objective 65 of the NPF repeated therein, which seeks to Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life. The applicant is invited to demonstrate compliance with 8.5.7 (i) of the Fingal Development Plan and with NPO 65 of the National Planning Framework to facilitate further consideration by the Planning Authority.
8. Having regard to the inclusion of Cargo Flights in modelling forecast assumptions, and the absence of any proposal for development/intensification in this regard the applicant is invited to clarify the intent and to revisit the proposal as necessary in this regard.
9. The applicant is requested to provide further detailed information on uses of each building for demolition or otherwise proposed to be displaced with particular detail on the extent to which the proposal in this regard complies with section 7.2.6 and 7.2.7 of the LAP and objectives CG01, CG02, MRO01 and MRO02 therein relating to development of cargo and MRO functions.
10. The applicant is requested to submit a detailed schedule for project elements contained within the proposal which are repeats from recent applications setting out and highlighting each change in graphic and tabular format in the interest of clarity.
11. For the purposes of clarity, the applicant is requested to ensure that the format and presentation of the Further Information response is submitted in a coherent and consistent manner including but not limited to the naming conventions for reports and drawings associated with individual project elements, cross

referencing of reports, completed reports and that all drawings include appropriate key plans and spot levels.

12. With regard to the airport capacity documents submitted, the applicant is invited to submit the following information for consideration of the Planning Authority:
 - a. For purpose of clarity the applicant is requested to differentiate between parts of appendix 9-7 of the EIAR that are re-used from the Relevant Action and parts which are new to the subject application.
 - b. The applicant is invited to respond to the suggestion that some sensitivity tests that forecast a small range of future fleet mixes under the various scenarios been presented within Appendix 9-7 should be presented to represent the impact on fleet mix in the with and without NRRRA scenarios.
 - c. Definition of the busy-hour rates for the existing level of demand and for the 40mppa scenario; the busy hour passenger volumes should be split by terminal, and should be further split by arrivals, departures, transfer and combined; furthermore, peak hour volumes should be defined for departing, arriving and total aircraft movements.
 - d. The definition of the aircraft stand and gate capacity should be reviewed, revised and re-submitted by focusing the analysis on the peak hour rather than on the peak day.
 - e. The definition of the gate capacity should be reviewed revised and resubmitted by looking at the holdroom space and the number of gates together, in order to define the existing capacity and the future requirements.
 - f. Background calculation of the future gate and stand capacity should be provided to demonstrate the level of capacity in relation to the 40mppa peak hour demand.
 - g. In order to validate that the proposed developments included in the proposal are commensurate with the forecast BHRs, the applicant is invited to provide a forecast of BHRs for at least 5-yearly intervals. The BHRs should be split by terminal (T1 / T2) and flow (arrivals, departures, transfers and combined). A separate BHR forecast for US-bound departing passengers should also be included for the assessment of the U.S. Preclearance facility.
 - h. For the purposes of clarity, and assessment the applicant is requested to submit a demonstration of how particular segments of traffic are likely to grow and how this may directly create a need for the proposed developments in the IA. For example, the IA includes a proposed expansion of the U.S. Preclearance Facility, but there is no analysis that sets out how the forecast volumes of US-bound traffic are set to increase in the future, and therefore the need for the expansion and the scale of the proposed facility has not been justified.

i. The mppa and proportion of G1 and G2 aircraft associated with the various forecasts scenarios should be set out by way of commentary so as to provide an indication of the evolution of the forecast noise environment and to support the approach to future forecasting in this application.

j. The applicant is invited to respond to concerns that the fleet mix presented in Appendix 9-7 is relatively optimistic in terms of the share of more sustainable and quieter 'G2' type aircraft (e.g., Boeing 737 MAX, Airbus A320neo etc.) assumed to operate at the airport in the short term compared to the share of older 'G1' types (e.g., Boeing 737-800, Airbus A320ceo). The applicant is requested to confirm the historical trends, current baseline and realistic forecast of number of G1 and G2 aircraft in the core fleets based in Dublin and a realistic forecast of the number of total aircraft movements that will be undertaken by G1 and G2 aircraft in 2025.

k. The applicant is invited to respond to the case that where forecasting is undertaken with future operations in accordance with conditions 3d and 5, that in that case the airport is currently operating several years ahead of the forecasted traffic volumes thereby undermining the forecasting and associated assessments including air quality and noise before it commences.

l. Whilst the Planning Authority note the justification presented for the forecast significant intensification of night time cargo operations, the applicant is advised that the case presented is considered to be of limited merit and is therefore invited to provide a detailed justification or revision to the forecast increase of cargo ATMs in a 2025 schedule given that 10 operated on a typical night in 2019. Confirmation should be provided that the additional cargo ATMs observed during the height of the COVID-19 pandemic have not been included in the baseline and subsequent years of their forecast. Up-to-date movements data (2023 actuals or provisional 2024 schedule) should be provided to compare the number of night time cargo ATMs against 2019 to see if 26 cargo ATMs seems reasonable (on the representative busy day).

m. A standalone traffic forecast report should be submitted by DAA that captures the key points identified within all the traffic forecast related requests.

n. It is noted that the original design of T2 along with extension of T1 was determined by the DAA to provide terminal capacity for 35mppa and that phase 2 of T2 provided for 3mppa capacity (this was omitted by ABP). Taking account of the reference to the development of T2 Phase 2 not being compromised by the current application, the applicant is invited to clarify i) the reason why delivery of phase 2 T2 does not now form part of the proposal for increase of the cap. ii) the basis for the revised approach to delivery of capacity since 2006, iii) to confirm the applicants intention or otherwise to complete Terminal 2 or otherwise iv) when

and in what context would the completion of Phase 2 of T2 become desirable to the DAA and v) how the 3mppa as per the original T2 proposal if delivered relate to the overall capacity now sought.

o. Taking account of the environmental impact arising from moving the Cuckoo Stream to provide additional stands to the South Apron and the extent of greenfield land take for the provision of stands on Apron No. 7 along with consideration of proposed indicative phasing of these stands, the applicant is requested to demonstrate the impact on airfield capacity (including MPPA) of removal of these stands from the proposal. This specific capacity impact assessment of the reduced number of stands should include a comparison of stand to MPPA ratios in comparable airports.

13. The Planning Authority and the statutory transportation authorities have concerns regarding the adequacy of the transport proposals to support the proposed development, in particular the intensification of the transport demand generated by the proposed 25% increase in passengers. In this regard the applicant is requested to provide sufficient justification and rational for the proposed increase in passenger demand, with specific reference to the requirements of section 8.2.3 of the Dublin Airport LAP. This should be presented in the form of a complete stand-alone Traffic Impact Assessment for the proposed development, taking into consideration this request for additional information.
14. The Transportation Planning Section requires the following additional information in order to undertake a full assessment of the proposed development:
Traffic Impact Assessment:
 - a. All of the raw survey data collected in May of 2019 used to inform the analysis of the impact of the proposed development shall be provided. Additional check surveys shall be carried out to verify the traffic flows on the surrounding road network in both the May and July periods and to support the use of an uplift factor for the purpose of setting thresholds for monitoring purposes. These additional surveys shall be provided to the local authority. Passenger flight profile information from the DAA shall also be provided in order to allow for cross-referencing in order to validate the proposed July threshold uplift.
 - b. The M1/M50 and M1/Airport Link Road junctions should be included within the Traffic Impact assessment. In addition, other locations deemed sensitive as identified and agreed by FCC/TII/NTA shall be included within the assessment study area. The scope of the assessment shall be agreed with the TII/NTA and FCC.

- c. A full and detailed breakdown of how the additional 8m annual passenger capacity is expected to be broken down across the full year at the airport, into passenger demand, shall be provided. This information shall be independent of choice of travel mode (i.e. passenger demand only). This shall include information regarding the expected seasonal increases in peak periods and any sensitivity scenarios relating to transfer trips, etc.
 - d. A full and detailed breakdown of the methodology used to determine the expected daily trip increase (irrespective of mode) based on the passenger capacity increase to 40mppa shall be provided. The methodology by which the anticipated daily trip increases are then further divided, both across the full 24-hr typical day and into the peak periods, and how these trips are applied to all relevant junctions shall also be provided. This information shall be provided for passenger and staff trips, separately.
 - e. The analysis shall consider three-hour morning and evening peak periods.
 - f. The scenarios assessed as part of the application should not include any uplift in bus services beyond that which is planned or committed.
 - g. Airport Roundabout and Corballis Road South junctions should be included in the microsimulation model.
 - h. Appropriate Mode shares for all scenarios shall be clarified and agreed with the Planning Authority, TII and NTA.
15. Monitoring & mitigation Measures:
- a. A more robust monitoring framework and associated mitigation measures shall be put forward for review and the agreement with the Planning Authority, TII & NTA. Metrics to be included shall be agreed with the statutory bodies. The analysis shall include the assessment of a 36mmppa scenario, details of which to be agreed with the Transport planning Section. Additional traffic data shall be required to be collected in both May and July, scope to be agreed with the Transport Planning Authority.
16. Growth Profile vs Infrastructure Phasing:
- a. A detailed anticipated passenger capacity increase growth profile shall be provided clearly indicating the timeline for any increases beyond 32mppa, on an annual basis over the expected growth trajectory to 40mppa. This growth trajectory estimate shall also be provided with the expected construction phasing plan, in order to clearly identify the requirements for specific project elements to

be in place in order to 'unlock' additional passenger capacity.

17. Project Element 11 Junction Upgrades:

- a. The requirements of designations and functions of the M1 link road and airport roundabout require further analysis to ascertain and address the specific technical, design, legal and funding requirements. This analysis shall be undertaken by the applicant in consultation with the TII and Fingal County Council.
- b. Revised proposals for the delivery and funding, by the applicant, of the other junction upgrades that have been included in the boundary of the application and are required to serve the proposed development.

18. Project Element 4 New Apron:

- a. The exact length of the required extinguishment and removal of the R108 shall be provided by the applicant.
- b. Further discussion and agreement with the applicant with regard to the procedural and legal items to be addressed in undertaking the extinguishment of R.O.W statutory process is required.
- c. The location of the commencement of the extinguishment of the ROW is to be revised and agreed with the Council to negate the impairment of access to 3rd party lands.

19. Ground Transportation Centre (GTC):

- a. The applicant shall confirm that the design capacity of the GTC has considered the requirements for additional bus services that has been identified in the application.
- b. The static analysis used to inform the GTC design shall be provided. In addition, detailed pedestrian modelling analysis of the GTC shall be undertaken and provided, with a sufficient degree of sensitivity/perturbation used to assess the level of service under differing operational conditions.
- c. A Road Safety Audit/Quality Audit of the proposed GTC shall also be prepared and submitted.
- d. The proposed construction period for the GTC shall be clarified (i.e. 15 months vs 24 months). Proposed bus service and passenger movements shall be provided for each interim phase of the construction period. The requirements to accommodate increases in bus services and passenger demand as the airport capacity incrementally grows from 32mppa to 36mppa and onwards to 40mppa

shall also be presented and accommodated within the construction phasing.

e. A revised GTC layout should be submitted including a co-ordinated design with the proposed MetroLink Airport Station. Conflicts between the proposed redline of the GTC and the Metrolink permanent and temporary land takes should be resolved in the revised GTC layout.

f. A revised GTC layout should be submitted following consultation and agreement with the NTA & FCC.

20. Parking:

a. A full and detailed airport campus car parking audit shall be provided to include information regarding the exact locations, designation and capacities and category (staff/passenger/rental/contractor/visitor/other) of each parking location its status authorised and/or established. Where an area of car parking is committed/authorised to serve a specific use such as is the case for the terminal hotel this should be made clear within the submitted audit. The utilisation of each car parking area is to be provided including peak occupancy and any seasonal variations. This shall also include information regarding all parking associated with other non-airport related uses within the campus.

b. In addition, the rationale/justification and design calculations associated with the proposed parking increases shall be provided. Staff and passenger car parking information shall be presented separately. The car parking audit shall also specifically examine the impact of the closure of the QuickPark car park on car parking demand and utilisation across the study area and the impact of the reduction in staff parking capacity.

c. The applicant is invited to submit a definition of Long term and Short term car parking in the interest of clarity.

21. EV charging:

a. EV charging and compliance with the Fingal County Development Plan 2023-2029 (CDP) objective regarding EV charging requires further consideration. In particular for staff parking, care hire and other such services provided at the airport should be further considered and agreed with the Planning Authority.

22. Mobility Management Plan:

a. Absolute values for mode shares are required to be provided as part of

the mobility management plan. Mode share data from 2023 shall be required to be provided.

b. A detailed breakdown on passengers is required. This information should include passenger information detailing the purpose of travel, namely recreational/business, residency and origin/destination by County.

c. A Cycle port shall be considered for inclusion in the proposed development.

d. Further consideration should be given to undertaking improvements to footpaths and provision of cycle infrastructure within DAA-owned lands, with consideration of connectivity to the proposed wider active travel network as set out in the GDA Cycle Strategy/Cycle Connects. The applicant should liaise with FCC and the NTA in this regard.

e. Revised layouts shall be provided indicating Airport cycle infrastructure connectivity with BusConnects scheme and associated cycle infrastructure, at both the Airport Roundabout and the Cloghran Junction

23. Construction:

a. A revised Construction Environmental traffic Plan shall be required to incorporate the impact of construction traffic on the wider road network and to consider the potential cumulative impacts from other developments that may be under development concurrently. The scope of the CETP is to be agreed with the applicant, FCC & TII

b. Further information is required with regard to an overall construction compound strategy for the proposed development, this should include locations and status of existing compounds and proposals to rationalise these with the proposed compounds and proposals to remediate these areas once their use has ceased.

24. Public Lighting

a. Further information / detail is required on proposed mitigation measures from the project elements on the local ecology with respect to the proposed lighting.

b. Further information is required on the baseline environment of the surrounding areas and the impacts of obtrusive light effects from each element of the proposed development on areas not previously lit, on adjacent residential dwellings, the M1 and the surround road network.

- c. Horizontal and vertical illuminance calculations to be provided as part of this assessment.
 - d. Further information is required on the proposed lighting of the Ground Transportation Centre and surrounding entrance and exit road network to the GTC.
 - e. A lighting layout drawing is required for Project Element PE9 - Long-term Car Park (Red) (Temporary), and for Junction 2 - R132 / Corballis Road South (PE11 - Junction Improvements).
 - f. Clarification is required on the tilt used in the lighting calculation reports for Project Elements PE8 - Terminal 2 MSCP extension, PE9 - Long-term Car Park (Red) (Temporary), and PE10 - Staff Car Park North. Is the calculation tilt luminaire only or outreach bracket and luminaire.
 - g. Clarification is required in relation to Junction 4 - R108 / Old Airport Road in Project Element PE11 - Junction Improvements, and the location of public lighting infrastructure if the existing grass verge is removed.
 - h. Utility Alteration plan drawings for Project Element PE11 - Junction Improvements, to be updated to show all proposed public lighting service diversions.
 - i. For each junction listed in Project Element PE11 - Junction Improvements, and along the site boundary, drawings clearly indicating the boundaries and areas in charge of the applicant, Fingal County Council (FCC) and Transport Infrastructure Ireland (TII) are required to be provided.
25. In addition to the airport related measures the applicant is invited to submit a carbon reduction strategy dealing specifically with reduction of total projected carbon arising from the aviation related expansion to demonstrate compliance with section 5.1.8 of the LAP including the climate action objectives of the LAP and specifically with Objective CA02.
26. The following further information is requested by the Water Services section to inform their assessment:
- a. Further information is required regarding the necessity to position the CPCF and pipework within a riparian corridor other than to avoid any design conflict with the Long-Term Car Park (Red). Further information is required on the biodiversity and ecological impacts of the proposed below-ground infrastructure proposed within the riparian zone.
 - a. Further information is required detailing the impact of the proposed CPCF

because of changed ground water baseflow characteristics and its impacts on the Cuckoo Stream and potential to impact flooding.

b. Further information is required identifying the risk associated with the potential impact and mitigations of a breach of the proposed flood bund in peak conditions to the car parks, the M1 and surrounding areas.

c. Further information and modelling are required (in contaminated and clean flow simulations) on the impacts to the flood bund for the scenario where the CPCF is at capacity and the Cuckoo Stream is surcharging within the flood plain due to a high flow event. (Where Overflow 3 ultimately overflows to the flood bund.) The Overflow 1 arrangement includes flow control mechanism to prevent any backflow along the overflow pipeline from the flood plain. During such a scenario, overflow 3 would be used instead of overflow 1 and overflow 2 to avoid surcharging of CPCF pipelines and CPCF tank.

d. Further information is required where the contaminated flow cumulative peak design flow rate of 18.2 m³/s is discharging to the Cuckoo Stream via overflow 3 and the CPCF is discharging at maximum rate also to the Cuckoo Stream. Consider the eventuality also that the outflow control device may block. What would the mitigation plan be in this or similar scenarios.

e. Further information is required demonstrating the functionality of the proposed surface water system in the adjoining and surrounding areas of the 'naturalised flood plain' and flood bund.

f. Further information is required identifying the risk associated with the potential impact and mitigations of a breach of the proposed flood bund in peak conditions to the car parks, the M1 and surrounding areas.

g. Further information is required demonstrating the incorporation of all of the fundamental principles of Sustainable Urban Drainage (SuDS) to both the design strategy across each project element. Discounting of alternative designs such as removal of wetlands which pre-date the airport (flood plain) and permeable surfaces in car parks on account of wildlife activity without detailed justification should be justified.

h. Further information is required demonstrating how the proposed drainage infrastructure, scada system, (including monitoring of permitted set diversion concentrations) and the CPCF will operate in the event of mains power interruptions.

i. Further information is required on the operation and monitoring of the flood bund flow control device (limiting peak discharge not to exceed currently permitted maximum levels.) and the effects of blocking in all conditions. The changed hydraulic loading on ground conditions resulting from the flood bund

should be assessed in relation to all potential structural impacts and mitigations on the adjacent M1 motorway and the surrounding areas. Further information is required regarding the hydrological and geotechnical impacts of the changed flow and loading characteristics associated with the flood bund on adjoining and nearby stakeholders and structures.

j. Further information is required regarding planned ongoing monitoring of the flood bund's structural integrity including the effects of erosion and the effectiveness of the proposed energy dissipation methodologies.

k. Further information is required on the long-term effectiveness of using large wooden structures for reinforcement to mitigate erosion and potential stream encroachment on the buried base of the flood bund.

l. Further information is required stating the impact of the proposal on downstream locations including potential changed surface water flow and volume characteristics and ground water behavioural change because of the proposal.

m. Further information is required to justify the realignment of the cuckoo stream from its long standing course which has been a townland boundary and functioning pre-dating OS1 mapping circa 1837.

n. The applicant is invited to submit a standalone Water Framework Assessment compliance report, taking into account and demonstrating that all aspects and elements of the proposal are consistent with the objectives of the Directive.

27. Uisce Éireann (UÉ) requests Further Information is sought as follows;

a. The applicant shall submit a pre-Connection Enquiry (PCE) to Uisce Éireann to allow UÉ assess the feasibility of increased demand and capacity for water and wastewater services to facilitate the proposals. The applicant shall submit the outcome of the PCE to the Planning Authority as a response to this Further Information Request.

b. The applicant shall submit a diversion enquiry to Uisce Éireann to complete a diversion feasibility assessment. The outcome of the diversion feasibility assessment shall be submitted to the Planning Authority as a response to this Further Information request.

In order to confirm the subject development will not impact on Uisce Éireann's Greater Dublin Drainage Project (GDD), Further Information is requested in relation to the following: -

c. The applicant shall provide revised layout drawings to the Planning Authority and UÉ clearly illustrating the GDD pipeline route corridor (permanent wayleave and temporary working areas) within their designs & layouts and ensure

separation distances and clearances, as per UÉs standards codes & practices are met.

d. The applicant shall confirm levels and locations of proposed services in the vicinity of the proposed GDD corridor and highlight any potential conflicts. Where potential conflicts are identified, the applicants are required to engage with Uisce Éireann's Greater Dublin Drainage Project Team to address and mitigate and submit final details to the Planning Authority.

28. The applicant is invited to submit a response to each of the points made in the submission of the IFI to the planning application in their role as a prescribed statutory consultee and should include the following:
- a. The result of the IFI assessments required by the statutory submission and written approval by the IFI.
 - b. Water Framework Directive impact assessment with specific regard to changes to Hydromorphology and water quality, in consideration of Article 4.7, directly indirectly in combination and cumulatively.
29. The applicant is invited to submit the following in order to facilitate the assessment of the proposal;
- a. The most recently updated Wildlife Hazard Management Plan (WHMP) for the airport.
 - b. Acknowledging the principle of remedial works to modified water courses where the opportunity arises such as the reopening of the upper culverted sections of the cuckoo stream within the airfield the benefits of the proposed modifications proposed to only remaining unmodified section of the Cuckoo in control of the application is not immediately apparent. The applicant is invited to submit further justification for works to realign the historical boundary forming cuckoo stream and, in such justification, provide competent expert opinion reconciling the biodiversity cost vs. the benefits.
 - c. The applicant is requested to submit a biodiversity impact assessment for the project. This should be submitted in a format whereby best practice for the protection of biodiversity in accordance with the policy set out in the Fingal Development Plan 2023-2029 should be demonstrated in the first instance and then discounted where an identified in conflict with the Wildlife Hazard Management Plan arises. Specific impacts on the design of the surface water control systems, landscape design and any other aspects on the design should be set out in this response. All EAIR mitigation proposed for habitat creation

specifically for willow warbler and goldcrest in the mitigation measures contained within the EIAR of the ADP project and the biodiversity mitigation measures in the EIAR for the infrastructure application should be reconciled in this impact assessment.

30. The applicant is invited to respond to the case that from an architectural design perspective the application presents disparate and somewhat incoherent project elements that do not read or consider the development of the airport as a single entity. Many of the proposals are poorly considered from a massing, aesthetic or experiential perspective. In responding to this request regard should be had to the report of the FCC architect's department. A report in this regard should be formed with careful reference to section 7.7 of the Airport LAP.
31. The following further information is requested by the FCC Conservation Officer for the proper assessment of architectural heritage aspects of the application:
 - a. Building Condition Report for all the Protected Structures within the DAA landholding. To include audit of existing uses and strategy for future use and timeline for any identified required repairs.
 - b. Omit the proposed demolition of the North Terminal Building, which is a building of national significance and is protected by being within the curtilage of a Protected Structure or provide further justification with detailed consideration of alternatives including its sensitive alteration.
 - c. Submit an analysis of the quality of design of Collinstown House and an appraisal of the impacts of the proposed Skybridge alterations that affect it physically, visually and functionally.
 - d. An Architectural Heritage Impact Assessment for proposals that affect the character and setting of the protected structure of the Church of Our Lady Queen of Heaven and should accompany any revised design of the GTC.
 - e. A planting scheme consistent with that outlined in the further information drawings for planning permission F19A/0493 and landscape plan indicating tree and hedgerow planting to be reinstated or supplemented within the subject site vicinity of Castlemoate house agreed with Fingal's Architectural Conservation Officer and the Parks and Landscape Officer should be submitted.
 - f. The applicant is invited to submit written confirmation from a professional competent in the field that the proposed changes to the R132/Old Airport Road junction will avoid any potential impacts on the Protected Structure of RPS No. 604

Thatched Cottage, Swords Road, its curtilage or setting.

32. The applicant is invited submit Further Information to specifically address the following recommendations of the Department for Housing, Local Government and Heritage; National Built Heritage Service:
 - a. Greater consideration of the reuse and adaptation of the C20th architecture based on the specialist reports compiled in support of the current development proposal
 - b. Integration of the C20th core buildings within the overall airport complex, making full use of their distinctive character
 - c. The input of a Grade 1 Conservation Architect or equivalent to inform the overall design approach based on the understanding of the original design and landscape, and to provide a conservation strategy for the historic properties and their settings identified to the airport perimeter to safeguard their cultural significance and to integrate them into the overall masterplan for Dublin Airport.
33. The following further information is requested by the Parks and Green Infrastructure Division to inform their assessment:
 - a. A detailed Landscape Mitigation Plan is required. The applicant shall meet with the Parks and Green Infrastructure Division prior to the submission of this plan to discuss compensatory planting and land management proposals.
 - b. Further information is required on the Community Gain aspect of this proposed development for the community of Fingal. The applicant shall meet with the Parks and Green Infrastructure Division prior to the submission of this information.
 - c. Further details are required on the boundary treatment as viewed from public roads with particular emphasis on visual amenity.
34. The applicant is requested to address the following observation and request of the Health and Safety Authority: The document 'Planning Report Infrastructure Application, Dublin Airport, Co. Dublin' refers to a 'Land Use Risk Assessment' in several sections, i.e. section 4.2.52, section 5.94, & section 7.0 Planning assessment summary. This assessment is not supplied in any of the documentation on the planning application website. The applicant is requested to submit the 'Land Use Risk Assessment'.

35. The applicant is invited to submit the following items regarding project element 1:
- a. The applicant is requested to submit an audit of the proposed structures sought for demolition to facilitate Project Element 1. This audit should include the details of the current uses / users and detail where those uses / users are being relocated to.
 - b. The applicant is requested to submit details in tabular form clearly showing a high level overview of the uses of the additional floor area proposed as part of Project Element 1.
 - c. The applicant is requested to provide clarity as to requirement for the additional service road and amendments to the existing service road.
 - d. The applicant is invited to respond and reconsider the design of Project Element 1 in accordance with the comments of the Architects Department and which take into consideration the comments of the Conservation Officer of Fingal County Council to ensure that the development will be of a high quality design and finish to reflect Dublin Airport's status as an international gateway airport as set out in Objective DS01 of the Dublin Airport Local Area Plan.
 - e. The applicant is requested to submit revised CGI images which include a viewpoint key which are consistent with drawings submitted and which clearly show the finalised proposals for Project Element 1.
 - f. The applicant is requested to submit a revised Architectural Heritage & Visual Impact Assessment Report which assesses the impact of finalised design details of all elements the Project Element 1.
 - g. The applicant is requested to submit a Visual Impact Assessment of Project Element 1 including relevant viewpoints details.
 - h. The applicant is invited to respond and reconsider the design of Project Element 1 in accordance with the comments of the Conservation Officer and Architects Department of Fingal County Council and the Department Housing, Local Government and Heritage. This includes the following:
 - i. Identify appropriate uses for the OCTB and implement a strategy to activate these.
 - ii. Justify or omit the proposed demolition of the North Terminal Building, as this is a building of national significance and is protected by being within the curtilage of a Protected Structure.
 - iii. Revisit the design for the OCTB Precinct and Module 1 structure to allow for the retention of the North Terminal Building and to protect and enhance the elements within the landscaped setting that contribute to its special character (i.e. the symmetry of the plan)
 - iv. Seek an assessment that considers and evaluates the embodied energy

contained within any existing structure proposed for demolition, outlines a waste strategy for these and set out an Architectural Salvage Plan for the re-use of materials or elements such as hanger doors, steel frames.

i. The applicant be requested to submit a specific Construction Environmental Management Plan for Project Element 1.

36. The applicant is invited to submit the following items regarding project element 2:
- a. The applicant is requested to submit a detailed schedule of differences between that which was previously submitted for the CBP under planning ref: F23A/0301 and that which is contained in the current proposal.
 - b. The applicant is requested to submit an audit of the proposed structures sought for demolition to facilitate Project Element 2. This audit should include the details of the current uses / users and detail where those uses / users are being relocated to.
 - c. The applicant is invited to respond and reconsider the design of Project Element 2 in accordance with the comments of the Architects Department of Fingal County Council to ensure that the development will be of a high quality design and finish to reflect Dublin Airport's status as an international gateway airport as set out in Objective DS01 of the Dublin Airport Local Area Plan.
 - d. The applicant is requested to submit details in tabular form clearly showing a high level overview of the uses of the additional floor area proposed as part of Project Element 2.
 - e. The applicant is requested to provide further clarity that Project Element 2 will not compromise the delivery or design of Phase 2, both airside and landside of Terminal 2 and to clarify if and when the DAA consider the need for this expanded terminal is likely to arise.
 - f. The applicant is requested to provide a clear rationale for the SASC. This should include details on where the current SASC functions are being undertaken and a reasoning for their service relocation to the SASC location.
 - g. The applicant is requested to provide a clear rationale for, alternatives considered to and consequences of removal of the proposal to reconfigure a section of the Cuckoo Stream from the proposal.
 - h. The applicant is invited to submit a detailed and considered assessment of the implications of moving the cuckoo on a future determination of compliance with WFD.
 - i. The applicant is requested to provide further clarify as to why the proposed remote PBZ, could not form part of phase 2 of Terminal 2 why the PBZ is needed

given the proposal for Pier 5.

j. The applicant is requested to provide clarify as to whether the proposals to reconfigure a section of the Cuckoo Stream form part of South Apron or ADP project elements.

k. The applicant be requested to submit a specific Construction Environmental Management Plan for Project Element 2.

37. The applicant is invited to submit the following items regarding project element 3:
- a. The applicant is invited to provide the rationale for proposal to retrofit an expansion to the capacity within T1 in preference to completion of T2 Phase 2 in order to deliver the enhanced capacity sought.
 - b. The applicant is invited to proof carefully and address the inconsistencies in a revised presentation of the project element including those listed in the planning report, such as the use of approximate dimensions in this project element.
38. The applicant is invited to submit the following items regarding project element 4:
- a. The applicant is requested to submit the rationale for closure of the R108, versus diversion and to demonstrate that this is the most viable option, whilst maintaining access to other lands in this area.
 - b. The applicant is requested to submit revised drawings which clearly demonstrates the location and addresses of the 6 no. habitable houses sought for demolition to facilitate the delivery of Apron 7. In addition, revised floor & elevation plans of the 6 no. habitable house should also be submitted.
 - c. The applicant indicates that the R108 is an existing right of way, however this has not been clearly identified on the drawings submitted. As per the Part 22 (2) (b) (ii) Planning and Development Regulations, 2001 (as amended) any wayleave shall be identified as yellow on the site location map. The applicant is therefore requested to submit a revised site layout plan clearly identifying the R108 in yellow.
 - d. The applicant is requested to submit information with respect to the existing structures and/ or lands located in the area surrounding the site associated with Project Element 4. This report should clearly indicate the uses / users of these structures and/or lands and include an assessment of any potential impacts including access to lands as well as on the visual and amenities and on the future development potential of any lands resulting from the proposed

development of Apron 7.

e. The applicant is invited to clarify that the proposed works to the existing natural drainage network are consistent with the objectives of the water framework directive (WFD) and to reflect that in a WFD compliance report.

f. The applicant is requested to provide details of the location of the foul drainage tank to serve the proposed Dispatcher building.

g. The applicant be requested to submit a specific Construction Environmental Management Plan for Project Element 4.

39. The applicant is invited to submit the following information regarding element 5:

a. The applicant is requested to submit a detailed schedule of differences between that which was previously submitted under planning ref: F23A/0460 and that which is contained in the current proposal.

b. The applicant is invited to submit a detailed assessment demonstrating that the provision of an underpass for the stated purpose does not comprise viability or limit potential of future development options for expansion of Dublin Airport, beyond the scope of this application. Consideration should be had to protection of locations for a new third terminal as referenced in section 7.25 and objectives EI03 and TP03 of the Dublin Airport LAP, Section 5.4.2 of the DTTAS 2018 review and in compliance with DA01, DA02 of the Fingal Development Plan

c. The concerns expressed by the planning authority in its previous consideration of this proposal, and required for agreement by compliance condition, regarding the architectural design of the proposed structures including airbridges Vertical Circulation Cores and impact on the pier should be addressed in response to this project element and in the wider architectural design request above.

40. Further information was requested for the ADP project ref: F23A/0636 and is incorporated here for completeness, the applicant is invited to submit the following information regarding element 6:

a. The applicant is requested to submit a detailed schedule of differences between that which was previously submitted under planning ref: F23A/0636 and that which is contained in the current proposal.

b. The applicant is requested to provide clarity as to how or if the development proposed as part of ADP Project Element 6 interacts with Long Term Car Park Project Element 9 as it would appear that infrastructure related to the

ADP runs directly under the proposed car park. Revised drawings may be required in this regard.

c. The applicant is requested to address the following:

i. The Planning Authority considers that a primary aspect of the remediation of the ongoing pollution is the provision of flows from upper catchment to the lower catchment which would result in a reduction in the overcharging of the existing pollution control systems. The applicant is therefore requested to provide a schedule of priority measures to address the ongoing pollution and dependencies between elements/phases of the proposal for construction and operation of each, with a view to demonstrating if the clean water supply pipeline and/or source control measures could be constructed and implemented in isolation to address the core objective of the application in advance of construction of the Pollution Control Centre. Alternatively, a justification as to why the current construction phasing is the preferred option should be clearly demonstrated. EIAR should be updated including the consideration of alternatives in this regard.

ii. For the benefit of clarity, the applicant is requested to provide commentary, definition, history of and interaction between the terms Cuckoo Stream, Cuckoo Supply Channel and Airfield Trunk Culvert and the use of each term for the purposes of the proposed development.

Central Pollution Control Facility (CPCF)

iii. Concerns are raised with respect to the location of the CPCF within lands designated within Flood Zone A, the associated habitat as well as in relation to the level of tree and townland hedgerow boundary removal required to facilitate the installation of the CPCF. The applicant is therefore required to provide a detailed assessment of alternative sites for the location of the CPCF or for a series of small tanks at other preferably brownfield locations within the Airport Campus. The assessment should clearly set out the rationale as to why alternative sites are not feasible for the proposed CPCF and/or why the currently proposed site is the preferred option of the developer. EIAR and AA should be updated accordingly.

Source Control Mitigation Measures

iv. The applicant is requested to justify the selection of a diffuse as opposed to a point-based source control mitigation approach. The applicant should clearly demonstrate the rationale for not proposing and increased use of Glycol Recovery Vehicles (GRV) as a source control of runoff from hydrologically isolated aircraft stands in order to reduce the pollution and volume to the CPCF. Existing operations and use of GRV's, the effectiveness thereof, the method of disposal of

the recovered material and decision making to determine that 4 no. GRV's is the optimal level for this source measure should be clearly set out in greater detail than that submitted to date. Response should include hours of operation, number of stands cleared, volumes, constraints to further use, and potential enhancements including hydraulic isolation of stands and collection sumps. The increased use of GRV's as a mitigation measures should also be incorporated into the EIAR and elsewhere in the application and supporting documentation in the interest of consistency.

Airport Growth

v. The applicant is requested to clearly demonstrate that the proposed ADP will not prejudice the orderly operation and continued growth of the Airport including as set out in Objective EI03 of the Dublin Airport LAP 2020 – 2026 particular consideration is required of total available and remaining capacity during operation of this proposal.

d. The applicant is invited to respond to the comments outlined in the report received from the Environment Section of Fingal County Council and to address the following:

i. Submit a copy of the AP52 email from Dr Steve Corsi USGS dated 8.08.2022 and details of the methodology and data used to calculate the ratio in the EIAR submitted.

ii. Clarify the diversion limit for the North Runway and if over the limit it is diverted to the pollution control tank or whether it is subject to another decision point and if so, what are the decision criteria.

iii. Provide details including area of each paved area discharging to the pollution control tank for each zone.

iv. Clarify the expected range of BOD concentration from de-icing runoff.

v. For each of the 30 years modelled provide a table showing the quantity of deicer used, quantity of deicer sent to sewer, quantity not diverted to the pollution control tank but to the stream and the quantity of deicer which overflows from the pollution control tanks to the stream.

vi. Quantify the improvement of flow in the stream as a result of reduced diversion to the sewer.

vii. Provide information on the intermittent nature of the BOD concentration in the stream using the tank sizing model and hourly calculation of the stream flow from the rest of the upstream catchment.

viii. Amend the EIAR mitigation measures chapter to include details in relation

to the storm tank sizing report modelling is based on having 4 Glycol Recovery Vehicles with 3 always operational as a mitigation measure, including the rationale that 4 GRV's is optimal.

ix. Provide the AP11 Dublin Airport Report May 2021, Subject Biological Monitoring of the Surface Water Quality – Cuckoo Stream.

x. Further information required to give confidence in the applicant's conclusion that the 50mg/l trigger limit under the new ADP is consistent with moderate WFD status.

xi. The memorandum recommends keeping detailed records of de-icing activities which should be included as a mitigation measure in the EIAR.

xii. Provide a table showing all results and associated de-icing activity (in the absence of de-icing activity data use temperature to estimate if de-icing activity was likely)

xiii. Provide a report on the Biological water quality results from the ecological monitoring.

xiv. Amend the EIAR to include quantitative impacts of the proposed development including analysis from the further information request.

xv. Amend the non-technical summary to provide more information on the level of BOD discharge to the river. The applicant is advised that where the further information requests a comparison between the current situation and the proposed situation, the 'as is' situation should be based on the current passenger numbers.

xvi. Address the ambiguity in the wording of the discharge concentration or receiving water concentration. If the 13mg/l is the discharge concentration the applicant should assess the receiving water concentration.

e. As the proposal in both concept and detail is directly and in inextricably linked to the WFD an amended WFD screening assessment is required and should be submitted to taking account of the following points:

i. The applicant is invited to proof read and submit a revised version of the report with notes that do not appear to be directed at the Planning Authority removed.

ii. The applicant is requested to submit a description as to the statutory/procedural nature of the screening exercise undertaken and as presented in the report, clarity as to who the competent authority is for such a screening as well as the consequences of screening in or out of a project such as that proposed.

iii. A detailed description of the current status of the subject water body and implications for the project of the final paragraph of section 2 of the WFD

assessment report.

iv. Taking account of the strong commitment of the DAA to achievement of the objectives of the WFD the applicant is invited to explain the rationale for not providing open channels for clean flows, particularly in the western reaches of the airfield where they would not be subject to the identified established pollutants arising from the established airport practices. DMSO158 of the CDP refers.

v. The applicant is invited to demonstrate the extent of compliance with the principle of in the first instance maintaining a naturally functioning flood plain as articulated in Policy including objectives CAP30, IUP13, IUO23, IUO26 and DMS160 of the Fingal Development Plan whilst the proposal seeks to remove the only remaining part of a natural flood plain.

vi. Section 4 of this report should be revised to clearly identify and distinguish between the upgrades of the existing and those that would supplement the existing system.

vii. Section 5.2 should be revised to include A full description of the pressures to which the subject water body is subject with particular emphasis on existing and proposed morphological impacts linked to both Biological and invertebrate Status or Potential.

viii. The statement that Unknown (Initial assessment has indicated it is hydromorphological Impacted - designation is. under review) Table 5.3 should be revised/augmented to provide context. (it is noted that Appendix B to the Water Framework Assessment Screening Report may contain elements of these considerations and is requested in addition to this amendment to the report).

f. Section 6. WATER FRAMEWORK DIRECTIVE SCREENING ASSESSMENT is dependent on the content of a technical memorandum that has not been provided and is now requested. It is unclear from the report if the expert opinion of specialists has extended to consideration of the potential of existing or proposed morphological changes to impact on the chemical and biological quality status of the water body, this should be made clear in a revised report.

g. Table 6.2 presents what is taken to a screening matrix representing the opinion of specialists of particular note is the Asterix over above the heading for the section in which hydromorphological quality elements are screened. The purpose of this Asterix is not evident and any revised draft should address this.

h. The list of assumptions/limitations at the end of the screening table 6.2 are not useful and would to a large extent appear to nullify the opinions of the expert author, these require a fundamental review with reference to the commentary in the body of the planning report.

- i. The applicant is invited to provide an expanded conclusion and recommendation section to the report in order to assist the Planning Authority with the expert opinion in understanding the detailed consideration in selecting the strategy and detail of the project to address the ongoing pollution of the Cuckoo stream.
 - j. The purpose of section 7.2 of the report is unclear and contains statements that could be considered contradictory to the proposal under consideration, a revised draft should be submitted with a reconsideration the overall approach to the Airfield Drainage Project as presented. With a specific consideration of the impact of removal of existing natural floodplain/wetland and detailed consideration and expansion of the concluding statement that appropriate land use management and pollution prevention at source are necessary. In addition to the above revisions to the report the applicant is requested to submit all supporting documentation as listed in Appendix B of the WFD assessment screening report as these are considered material to consideration and determination of the proposal.
41. In order to fully assess the proposed development, the applicant is requested to address the following items raised by Uisce Éireann:
- a. The applicant is requested to submit revised layout drawings clearly illustrating the Greater Dublin Drainage Project (GDD) pipeline route corridor (permanent wayleave and temporary working areas).
 - b. The applicant is requested to confirm levels and locations of proposed services in the vicinity of the proposed Greater Dublin Drainage Project (GDD) corridor and highlight any potential interactions between proposed infrastructures and projects.
 - c. The applicant is requested to submit a diversion enquiry to Uisce Éireann Diversions Section for Uisce Éireann to complete a diversion feasibility assessment.
42. In order to fully assess the proposed development, and in order to ensure that there is no conflict in the future delivery of the Metrolink project, the applicant is requested to address the following items raised by National Transport Authority (NTA):
- a. Concerns are raised by the NTA that the plans submitted appear to show elements of the proposed development in direct conflict with the Metrolink tunnel alignment and South Portal Ventilation Tunnel. The applicant is therefore requested to consult with the NTA and submit revised plans to clearly illustrate that the proposed development does not conflict with the proposed Metrolink

project.

b. The applicant is advised that the Metrolink tunnel alignment and associated infrastructure should be clearly shown on any relevant drawings submitted in response to this additional information request.

43. The applicant be requested to submit a specific Construction Environmental Management Plan for Project Element 6.
44. The planning authority has concerns as to the fundamentals of the design of this project element, the proposal presents a poor gateway feature to the Airport, lacks prioritisation for public transport, poor connectivity to the two terminals, unclear interaction with existing uses, proposed uses and the future Metrolink station. The applicant is requested to reconsider the design of the proposed Ground Transport Centre to provide greater integration with the existing Terminals, improved connectivity to the Terminal 2, improved pedestrian flows and experience and open interface with the future Metrolink station.
45. The applicant is required to engage with the NTA to finalise and agree the design and operational details of the Ground Transportation Centre taking into consideration the NTA's concerns as detailed in their submission in relation to both bus & coach services and the MetroLink project. This should take into consideration the operational requirements of the GTC, up to 36mppa, reflecting the requirements of Metrolink project.
46. The applicant is invited to submit the following information regarding element 8:
 - a. The applicant is requested to identify the uses and type of car parking already authorised / in use in the MSCP and clarify if permission is being sought for the reconfiguration of the existing authorised car parking spaces.
 - b. The applicant is invited to reconsider the design alternatives for Project Element 8 to ensure that the development achieves the design objectives set out in Objective DS01 of the Dublin Airport Local Area Plan and in order to minimise the visual impact of the proposal. Specifically, the aluminium brise soleil as proposed should be reconsidered in tandem with the existing façade treatment to create greater architectural quality as a substantial structure within the airport building complex.
 - c. The applicant is requested to submit a Visual Impact Assessment of Project Element 8 including relevant viewpoints details.

47. The applicant is invited to submit the following information regarding element 9:
- a. The applicant is invited to reaffirm the forecast necessity of the additional car parking spaces taking particular account of the absence of the c. 6000 spaces in Quickpark for the duration of 2023.
 - b. The applicant is invited to submit further detail of the consideration of alternative locations for the provision of long-term car parking with particular emphasis on demonstrating the consideration given to the current planning conditions and land use policies relevant to the provision of parking at Dublin Airport.
 - c. The applicant is invited to revisit the application of SUDS principles to the design of this car park taking account of projected occupancy based on baseline analysis of existing parking over time and with consideration of use of permeable surfaces, use of wetlands as evidenced in the adjacent car park to the immediate north and in the use of naturally functioning the floodplain in the design of surface water control for car parking to the immediate south.
 - d. The Planning Authority notes that Drawing D20135-ATK-C54-XX-XXX-DR-C-010-1515 illustrates a spur of the recirculation roundabout with a 'proposed access control barrier to prevent access to private road'. Following assessment, the Planning Authority has not established an existing road connection where proposed, or any proposal as part of this development for a private road or connection. Furthermore, the Planning Authority notes a conflict in design as part of PE6 a proposed Flood Bund to a height of 4m will flank the proposed temporary carpark to the north and west restricting any potential for access. The applicant is invited to clarify or amend the proposal as necessary for the avoidance of confusion.
 - e. The Planning Authority note that Drawing D20135-ATK-C54-XX-XXX-DR-C-010-1515 illustrates the provision of 2 no. surface access with 'proposed vehicle barrier to prevent public access to car hire storage area'. Following assessment, the Planning Authority has not established any permitted or proposed 'car hire storage area' in this location or any proposal for such as part of this development. The applicant is invited to provide details of existing established/permitted or proposed car hire storage in the area or in the alternative address any errors in this regard.
 - f. Taking account of the temporary nature of the proposal the applicant is invited to submit a site reinstatement plan to be implemented following expiry of the permission.

48. The applicant is invited to submit the following information regarding element 10:
- a. the applicant is invited to furnish to the Planning Authority an Audit of all parking spaces long-term, short-term and staff car parking, accurately detailing any changes in such provision such as losses, gains and displacements with details as to when these changes occurred.
 - b. The applicant is invited to consider the relocation of cycle stands to the green space south of the proposed bus stop on the Castlemoate road.
 - c. The applicant is invited to provide a rationale for proposal to locate access gates at the eastern and western access of the cycle route spur connecting the Castlemoate Road and R132 cycle networks.
 - d. The applicant is invited to proof carefully and address the inconsistencies in the material submitted in connection with PE10 in a revised presentation of the project element including those listed in the planning report.
 - e. The applicant is invited to clarify the referencing inconsistency and correct the scale of drawings in this project element.
 - f. The applicant is invited to demonstrate on drawings/cross sections the interface between PE 10 and the drainage infrastructure currently under construction to serve Apron 5.
 - g. The applicant is invited to better demonstrate the consideration of alternatives for this project Element.
49. The applicant is requested to clarify the development description for Project Element 11, as it would appear that the description of works as outlined in the application and on the notices does not accurately describe the proposed development as shown on the drawings and referenced in the documentation submitted. In particular it would appear that additional works that being; Active Travel (cycle) Measures located at Naul Road / Castlemoate Road are indicated as part of the junction improvement project, however, have not been included in the development description for this project element. Revised drawings and/or public notices may be required in this regard.
50. The applicant is requested to submit revised proposals for the delivery, phasing and funding by the applicant, of the junction upgrades that have been included in the boundary of the application and are required to serve the proposed development.

51. Having regard to the EIAR findings identified and the above, there are concerns that the proposed development as outlined would not align with a number of objectives in the Fingal Development Plan 2023-2029, which seek to ensure that the aviation sector can develop further and operate to its maximum sustainable potential, whilst at the same time 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, as well as impact on the environment, including the climate. Therefore, the applicant is requested to submit the following further information.

General

The assessment presented relies excessively on a qualitative assessment without appropriate or sufficient detail on quantitative effects of the Proposed Development. The EIAR should be revised and updated to provide a full and detailed Project Element by Project Element quantitative assessment of effects of the Proposed Development on all environmental factors. For example this should include the quantity and nature of green field lands removed; the quantity and nature of all materials excavated, exported, retained / reused, and imported; the quantity and nature of waste generated; requirements for dewatering of groundwater and / or water; the extent and nature of tree removal, hedgerow removal, removal of townland boundaries, loss of specific habitats, etc.

52. The assessment of impacts on all environmental factors should be reviewed on the basis of the detailed and specific evaluation of the quantified of the effects on the environment. Mitigation and monitoring requirements should also be reviewed and updated as required on foot of the re-evaluation of effects on the environment.
53. While referenced in methodology sections of the EIAR the assessment prepared for the Proposed Development do not assess indirect and / or secondary effects relating to the environmental factors. In accordance with Schedule 6 of the Planning and Development Regulations 2001, as amended, sub-section 2.(e)(ii), the revision and update of the EIAR should address the nature and likelihood of any indirect and / or secondary effects of the Proposed Development.
54. There is missing information, incorrect cross-referencing, typographic errors, etc. in the EIAR. For example, Chapter 6 of the EIAR refers to Figures 6-1 to 6-32 inclusive (in Volume 3 Figures), however, only Figures 6-1 to 6-22 inclusive are provided in Volume 3 of the EIAR and some of these are incorrectly titled or

referenced. These errors should be addressed with erroneous or missing information provided in the revision and update of the EIAR.

The revision and update of the EIAR including the associated figures, appendices and Non-technical Summary, must take account of the requirements and implications of the full extent of the items raised in the request for further information and the response to same

55. The EIAR should be revised and updated to include a review of the consideration and assessment of alternatives at both concept and Project Element level to provide an adequate detail for a detailed comparative assessment. The consideration and assessment should provide an appropriate level of detail for all proposed alternatives, including as appropriate, but not limited to, relevant locations with mapping of environmental sensitivities including watercourse, wetlands etc., a breakdown of storage requirements, infrastructure sizing, construction effects, waste and traffic generation and programme implications. This is to allow for a full, objective and evidence based comparative assessment of alternatives.
56. Chapter 6 of the EIAR and associated figures and appendices should be revised and updated to include:
 - h. Traffic Impact Assessment:
 - i. All of the raw survey data collected in May of 2019 used to inform the analysis of the impact of the proposed development shall be provided. Additional check surveys shall be carried out to verify the traffic flows on the surrounding road network in both the May and July periods and to support the use of an uplift factor for the purpose of setting thresholds for monitoring purposes. These additional surveys shall be provided to the local authority. Passenger flight profile information from Dublin Airport shall also be provided in order to allow for cross-referencing in order to validate the proposed July threshold uplift.
 - ii. The M1/M50 and M1/Airport Link Road junctions should be included within the Traffic Impact assessment. In addition, other locations deemed sensitive as identified and agreed by FCC/TII/NTA shall be included within the assessment study area. The scope of the assessment shall be agreed with the TII/NTA and FCC.
 - iii. A full and detailed breakdown of how the additional 8m annual passenger capacity is expected to be broken down across the full year at the airport, into passenger demand, shall be provided. This information shall be independent of choice of travel mode (i.e., passenger demand only). This shall include information

regarding the expected seasonal increases in peak periods and any sensitivity scenarios relating to transfer trips, etc.

iv. A full and detailed breakdown of the methodology used to determine the expected daily trip increase (irrespective of mode) based on the passenger capacity increase to 40mppa shall be provided. The methodology by which the anticipated daily trip increases are then further divided, both across the full 24-hr typical day and into the peak periods, and how these trips are applied to all relevant junctions shall also be provided. This information shall be provided for passenger and staff trips, separately.

v. The analysis shall consider three-hour morning and evening peak periods.

vi. The scenarios assessed as part of the application should not include any uplift in bus services beyond that which is planned or committed.

vii. Airport Roundabout and Corballis Road South junctions should be assessed using microsimulation for the external network peak periods.

viii. The Construction Stage impact shall be revised to incorporate a detailed the impact of construction traffic on the wider road network and to consider the potential cumulative impacts from other developments that may be under development concurrently. The scope of this analysis is to be agreed with FCC & TII.

ix. Appropriate Mode shares for all scenarios shall be clarified and agreed with the Planning Authority, TII and NTA.

57. Monitoring & mitigation Measures:

a. A more robust monitoring framework and associated mitigation measures shall be put forward for review and the agreement with the Planning Authority, TII & NTA. Metrics to be included shall be agreed with the statutory bodies. The analysis shall include the assessment of a 36mmppa scenario, details of which to be agreed with the Transport Planning Section. Additional traffic data shall be required to be collected in both May and July (scope to be agreed with the Planning Authority).

58. Growth Profile vs Infrastructure Phasing:

a. A detailed anticipated passenger capacity increase growth profile shall be provided clearly indicating the timeline for any increases beyond 32mppa, on an annual basis over the expected growth trajectory to 40mppa. This growth trajectory estimate shall also be provided with the expected construction phasing

plan, to clearly identify the requirements for specific project elements to be in place to 'unlock' additional passenger capacity.

59. Project Element 11 Junction Upgrades:

- a. The requirements of designations and functions of the M1 link road and airport roundabout require further analysis to ascertain and address the specific technical, design, legal and funding requirements. This analysis shall be undertaken by the applicant in consultation with the TII and Fingal County Council.
- b. The exact length of the required right of way extinguishment and removal of the R108 shall be provided by the applicant.
- c. Further discussion and agreement with the applicant with regard to the procedural and legal items to be addressed in undertaking the extinguishment of the right of way. A statutory process is required.
- d. The location of the commencement of the extinguishment of the right of way is to be revised and agreed with the Council to negate the impairment of access to 3rd party lands.

60. Ground Transportation Centre (GTC):

- a. The applicant shall confirm that the design capacity of the GTC has considered the requirements for additional bus services that has been identified in the application.
- b. The static analysis used to inform the GTC design shall be provided. In addition, detailed pedestrian modelling analysis of the GTC shall be undertaken and provided, with a sufficient degree of sensitivity/perturbation used to assess the level of service under differing operational conditions.
- c. A Road Safety Audit/Quality Audit of the proposed GTC shall also be prepared and submitted.
- d. The proposed construction period for the GTC shall be clarified (i.e., 15 months vs 24 months). Proposed bus service and passenger movements shall be provided for each interim phase of the construction period. The requirements to accommodate increases in bus services and passenger demand as the airport capacity incrementally grows from 32mppa to 36mppa and onwards to 40mppa shall also be presented and accommodated within the construction phasing.
- e. A revised GTC layout should be submitted including a co-ordinated design with the proposed MetroLink Airport Station. Conflicts between the proposed redline of the GTC and the MetroLink permanent and temporary land takes should

be resolved in the revised GTC layout.

f. A revised GTC layout should be submitted following consultation and agreement with the NTA & FCC.

61. Parking:

a. A full and detailed airport campus car parking audit shall be provided to include information regarding the exact locations, designation and capacities and category (staff/passenger/rental/contractor/visitor/other) of each parking location its status authorised and/or established. Where an area of car parking is committed/authorised to serve a specific use such as is the case for the terminal hotel this should be made clear within the submitted audit. The utilisation of each car parking area is to be provided including peak occupancy and any seasonal variations. This shall also include information regarding all parking associated with other non-airport related uses within the campus. If in the course of undertaking the audit anomalies are identified with regard to authorisation, or material change of use by way of intensification or otherwise the applicant/developer is invited to proposed measures to remedy the position.

b. The rationale/justification and design calculations associated with the proposed parking increases shall be provided. Staff and passenger car parking information shall be presented separately. The car parking audit shall also specifically examine the impact of the closure of the QuickPark car park on car parking demand and utilisation across the study area and the impact of the reduction in staff parking capacity.

62. EV Charging:

a. EV charging and compliance with section 14.17.10 of Fingal County Development Plan 2023-2029 regarding EV charging requires further consideration. In particular further consideration must be given for staff parking, car hire and other such services provided at the airport should be further considered and this should be agreed with the Planning Authority.

63. 63. Mobility Management Plan:

a. Absolute values for mode shares are required to be provided as part of the mobility management plan. Mode share data from 2023 shall be required to be provided.

b. A detailed breakdown on passengers is required. This information should

include passenger information detailing the purpose of travel, namely recreational/business, residency and origin/destination by County.

c. The proposed Cycle Port shall be considered for inclusion in the proposed development.

d. Further consideration should be given to undertaking improvements to footpaths and provision of cycle infrastructure within DAA-owned lands, with consideration of connectivity to the proposed wider active travel network as set out in the GDA Cycle Strategy/Cycle Connects. The applicant should liaise with FCC and the NTA in this regard.

e. Revised layouts shall be provided indicating Airport cycle infrastructure connectivity with the BusConnects scheme and associated cycle infrastructure, at both the Airport Roundabout and the Cloghran Junction.

64. Chapter 7 of the EIAR and associated figures and appendices should be revised and updated to include the following:

a. Given that 2022 has been used as the existing baseline in terms of passenger numbers / operational traffic and local air quality, please clarify how representative of 'normal' conditions is this taking account of the effects of Covid-19 restrictions.

b. In Section 7.3.43, please confirm if aircraft-related VOC emissions have included refuelling.

c. Section 7.3.43 cites the International Civil Aviation Organization (ICAO) Airport AQ Manual (Document 9889), but does not refer to emissions table (Table 3-A3-5) in the manual. Please clarify and revise methodology as required.

d. The statement in Section 7.3.43 that airport related odours are unlikely to be related to total VOCs is unsupported and potentially inaccurate. The odour assessment has arrived at a conclusion that some receptors are likely to have odour impacts arising from VOCs. Please revised / update / omit as appropriate.

e. The Copenhagen Airport odour modelling study is referenced in Section 7.3.44, however, it is noted that the study qualified its outputs, stating: 'uncertainties become large when the experimental data is used to estimate the odour emissions for all aircraft engines'. Therefore, the assessment needs to address the application of large error margins, and additional jet engine sources need to be considered. Similarly, in Section 7.5.7 (and Section 7.7.34), the assumption of 57 OU/mg/mg THC is based upon the Copenhagen Airport study and as such large error margins need to be applied, and additional jet engine sources need to be considered.

- f. In Section 7.4, please provide the baseline odour monitoring data and/or summary of odour nuisance complaints received over the last 5 years. Reports of odour nuisance to be provided as a map to allow 'hotspots' to be understood.
- g. In Section 7.4.9, passive monitoring has indicated exceedances of the annual mean NO₂ limit value at tube A11 in 2019 and the risk of exceedance in 2022. It is assumed mitigation measures (the introduction of a photobioreactor and new sustainability criteria are alluded to) will reduce air pollution at the bus depot. Please clarify, and confirm, with supporting evidence where available, the likely anticipated improvement in air quality. Will these measures be sufficiently robust to account for any impacts associated with the BusConnects scheme (to be considered as part of the cumulative assessment also)?
- h. In Section 7.5.6 locations of ecological receptors are shown in Figure 12-1. Please provide figures showing transects assessed at each location.
- i. In Section 7.5.7 (& Section 7.7.34), please provide a figure indicating the location of odour sources.
- j. In Section 7.7.3 and on Figure 7-3 please reference / provide a figure showing the number and location of sensitive receptors within 250m of the site boundary. Potential construction routes should be marked as well as the receptors within 50m.
- k. In Section 7.7.13 and Appendix 7-4, the text states that the full construction road traffic emission results are presented in Appendix 7-4 but these cannot be located. Please provide the results of the construction road traffic / emissions assessment.
- l. In Sections 7.7.45 to 7.7.48, operational impacts associated with the proposed 3 x hotels and proposed 1 x office have been screened out as they will be limited. Please clarify the source of these assumptions.
- m. Please provide a consolidated list of legislation, policy and guidance documents used in the assessment, together with a brief explanation of their relevance, in Chapter 7. For example, elements of the Environmental Protection Agency's Air Dispersion Modelling from Industrial Installations Guidance Note (AG4) are used in the assessment but AG4 is not listed in this section.
- n. In Appendix 7-1, the IAQM's 'Guidance on the assessment of dust from demolition and construction' published in 2023 has been withdrawn. Replacement guidance was issued on 25/01/2024. Please confirm no change to assessment, or revise / update as required.
- o. In Section 7.1.2 in Appendix 7-2. The latest version of ADMS-Road is version 6, whereas version 5.0.1.3 was used in the assessment. Please confirm no change to assessment, or revise / update as required.

p. In Section 7.1.4 in Appendix 7-2. Please clarify, and revise / update as necessary, if the operational traffic scenarios (and modelling) consider 'worse case' impacts (taking into account the difference in DM and DS by year).

q. In Section 7.2.8 in Appendix 7-2. Please clarify, and revise / update as required, if the robustness of the assessment of car park emissions been improved by the consideration of 'cold starts', given that vehicles are likely to be left standing for some time.

r. In Section 7.2.9 in Appendix 7-2, please clarify if NH₃ should be nitrate, or not, and revise / update as necessary.

s. In Section 7.2.10 in Appendix 7-2, please clarify, and revise / update if necessary, how the will the plant assessed be sequenced.

t. In Section 7.2.11 in Appendix 7-2, please clarify, and revise / update if necessary, if all relevant point source emissions have been considered, in addition to those within the terminal buildings? Given the nature of the proposals it is anticipated that there would be emergency generators, how will these be operated and the impacts assessed

u. In Section 7.2.10 & 7.2.11 (and Table 7-2) in Appendix 7-2, please clarify and revise / update and expand on the following points as required:

i. It is presumed that the boilers and CHP will be natural gas fired. More detail is required for the point source assessment, such as:

- modelling package used
- grid spacing/setup
- consideration of building effects (together with the mapping sources used to determine building layout)
- corrections applied to emissions data
- reference oxygen conditions used.

In addition, has consideration been given to comparison of the PEC hourly mean with the short-term NO₂ objective.

To ensure the robustness of the assessment, how have the 'worse case' emissions been determined, i.e., has the model been run with several years of met data.

Define 'emission rate' and 'profiled emission rate'.

The profiled emissions are 5% of the stated emission, what should be inferred from this.

For the boiler emissions, is the efflux temperature realistic and contribute to a conservative assessment of impacts.

b. In Section 7.5.4 of Appendix 7-2, the viaducts listed have designated receptors within 200m. Please clarify and revise / update as required, how have elevated roads been parametrised in the model to ensure a conservative

assessment of impacts at these locations.

c. In Table 7-5 of Appendix 7-2, please clarify and revise / update as required, what height were impacts predicted for the designated ecological sites.

d. In Table 7-7 of Appendix 7-2, please confirm, and revise / update as required, whether the values shown represent the lower critical loads for these features.

e. In Section 7.9.2 and Figure 2 of Appendix 7-2, 2019 monitoring data has been annualised to represent annual mean values for 2022. The scheme specific monitoring sites are in the area immediately surrounding the airport (up to c.5km). Please clarify and revise / update as required. Please expand on the approach taken, e.g., use of bias adjustment factors (including source), sites used to annualise the data, etc. Please comment on the appropriateness of the sites and locations chosen, which are located in the area immediately surrounding the airport, in relation to the extent of the wider road network.

f. In Section 7.1.1 of Appendix 7-3, as the latest version of AEDT is v3f, please clarify, and update as required, if this likely to result to any changes in the assessment

g. For the Aviation Environmental Design Tool (AEDT) in Appendix 7-3, please clarify and revise / update, as required, how has the LTO cycle been represented in the model. How have variations in take-off parameters, e.g., thrust, angle, been calculated.

h. In Section 7.3.4 of Appendix 7-3, please cite mapping sources used to determine building layout.

i. In Section 7.3.7 of Appendix 7-3, please confirm and revise / update as required, why has 2km from the runway end rather than a height above ground been used. Is this a conservative approach. Are there any restricted airspaces or reasons that aircraft would make a U-turn (thus doubling emissions).

j. The assumption in Section 7.4.3 of Appendix 7-3, is not conservative unless there is a commitment by the airport to achieve this. Please confirm and revise / update as required.

k. In Section 7.4.4 of Appendix 7-3, please confirm and revise / update as required, by 'week', does it mean Monday to Sunday (i.e., annualised data = busy day x 365) or Monday to Friday (with some scaling factor applied).

l. In Section 7.4.6 of Appendix 7-3, please confirm and expand as required, what proportion of aircraft have more than one engine code. How has the single engine code been determined.

m. In Section 7.4.9 of Appendix 7-3, please confirm and revise / update as required, what the %age thrusts are (or a ref to a table) for different parts of the LTO cycle.

- n. In Section 7.4.16 of Appendix 7-3, please confirm and revise / update as required, if the runway assignment split correlates with the meteorological data used in the assessment (for 2022). Is the met data used (for 2022) representative of 'typical year' conditions, say based on a 5-year average?
- o. In Section 7.4.21 of Appendix 7-3, please confirm and revise / update as required. It is assumed that this is a conservative assessment as this would lead to increased queuing on less busy days.
- p. In Section 7.4.22 of Appendix 7-3, please confirm and revise / update as required, as it is unclear why this is a conservative assumption.
- q. In Section 7.4.25 of Appendix 7-3, please confirm and revise / update as required, if the assessment considers the 'worse case' impacts (taking into account the difference in DM and DS by year).
- r. In Section 7.4.28 of Appendix 7-3, please clarify and revise / update as required, if there is a way of 'ground truthing' the assumptions against operations specific to Dublin airport.
- s. In Section 7.5.2 of Appendix 7-3, please clarify which version of AERMOD/AERMET has been used to generate the met data used in the assessment.
- t. Figure 7-1 (all Figures), please clarify and if necessary, update. Is the modelled road network the affected road network (ARN).
- u. As the affected road network is defined by the difference between DS (future operational) and DM (future baseline) traffic flows it is unclear why there are three modelled road networks.
- v. Is there any difference between the ARN 'without NRRRA' and 'with NRA'.
- w. Figure 7-1, page 5 of 7, there is a gap in road network (St. Margaret's Road) next to receptor SV006. Please confirm if impacts have been correctly assessed at this location. Revise / update as required.
- x. Figure 7-1, page 6 of 7, Figure 12-1 shows that the Santry River pNHA is split into two components, both within 200m of modelled road links. Impacts are considered at E04 which covers the southern portion. Please clarify why impacts on the northern portion have not been assessed. Revise / update as required.
- y. Figure 7-1, page 6 of 7, the M50 up to Dublin Port forms part of the modelled road network; however, impacts at existing receptors have not been considered along this section of the road network. Does this section of the M50 form part of the ARN. If so, explain why impacts at existing receptors have not been considered? Revise / update as required.
- z. Figure 7-1, page 7 of 7, the designated ecological sites within 200m of the southern section of the M50 / modelled road network are not given in Section 12.4

'Wider Study Area' nor shown in Figure 12.1. Please clarify and revise / update as required.

aa. Under Chapter 12 Biodiversity, Table 12-4, Section 12.7.13 and Figure 12-1. It is noted that Table 12-4 does not refer to the Bog of the Ring and Royal Canal pNHAs which are mentioned in Section 12.7.13 (which comments on the likely significance of air quality impacts on designated ecological sites). Receptors E06 Liffey Valley and E07 Grand Canal are also omitted (together with their designation). The project ecologist should confirm the extent of features within wider study area with all disciplines and include those within 200m of the modelled (assumed to be the ARN) road network considered in AQA.

bb. Update Figure 12-1, as appropriate, to align with Table 12-4

cc. Under Chapter 12 Biodiversity and Section 12.7.16. Consideration of impacts on designated ecological sites within 0m to 10m of the road have been discounted. The 'edge effects' stated (salt spray, runoff, buried services) will only be temporary and short-lived in nature and are not considered robust grounds for excluding consideration of impacts at the road edge where, given the nature of the source, they potentially will be greatest.

dd. Please confirm how this approach is consistent with Sections 5.3.9 and 5.4.1.13 of the IAQM's 'Guidance on the Assessment of Air Quality Impacts on Designated Nature Conservation Sites (2020)', which has been used in the assessment (as noted in Section 12.2.1).

ee. Please confirm if considering impacts within 0-10m of the road edge will alter the assessments findings. Revise / update as required.

ff. Under Chapter 22 Cumulative Effects and Section 20.3. The study area / zone of influence (Zol) is limited to within 1km of the application site boundary. Please clarify and revise / update as required, how have cumulative air quality impacts been considered that are within 200m of the modelled road network which extends more than 1km from the application boundary.

gg. As a minor comment, to aid the reader, it would be helpful if receptors were referred to by their IDs given in Chapter 7 (Air Quality), as well as by their names.

hh. There are a number of typographical errors and incorrect cross-referencing throughout the documents that make up the assessment. In revising / updating the documents these should be corrected.

65. The EIAR and associated figures and appendices should be revised and updated to include:

- a. For the purpose of the assessment of operational road traffic noise, in addition to the roads assessed within Chapter 8 of the EIAR, other roads predicted to generate noise levels less than 60 dB Lden should be included if there is a 1 dB change or greater identified. Predicted change in noise level should be assessed against criteria presented within Table 8-5 of Chapter 8 of the EIAR.
 - b. Provide assessment of operational road traffic noise impacts associated with junction improvements. Alternatively, provide appropriate justification for excluding this from assessment.
 - c. Provide signposting to origination of Traffic data underpinning the operational road traffic noise assessment.
 - d. Check eligibility for receptors on Swords Road and Old Stockhole Lane which have not been included within the construction noise assessment and add to the assessment as necessary.
 - e. Provide data to substantiate the adopted construction noise assessment BS5228:1 ABC category choice for evening, night and weekend or use Category A for these periods.
 - f. Include assessments comparing future baseline without NRR and Proposed Development With NRR scenarios. Alternatively, provide appropriate justification for not including this.
 - g. The construction noise assessment should be updated to include activities associated with junction improvements. Alternatively, appropriate justification should be provided for not including these.
 - h. Review data underpinning construction traffic noise assessment, provide justification for the flows used and update assessment if necessary.
 - i. Include assessment of noise from operational building services plant and car parking. Alternatively, provide appropriate justification for not providing these assessments.
 - j. Assessment of road traffic noise on construction diversion routes should be undertaken. Alternatively, appropriate justification should be provided for not assessing this.
 - k. Assessment of road traffic noise on construction diversion routes should be undertaken. Alternatively, appropriate justification should be provided for not assessing this.
66. The EIAR and associated appendices should be revised and updated to include:
- a. Provide or signpost analysis underpinning the derivation of the interim worst case year and associated ATMs. Analysis should clearly consider

uncertainties and how these have been addressed (for both existing and new slots). Provide justification for selection of 2027 for the interim worst case year. Justification should consider pace of growth and fleet modernisation for each assessment scenario. Provide details of how it will be ensured that impacts and significance of effect will be no worse than assessed.

b. Provide aircraft noise contours accompanying both ground and air noise assessments.

c. Provide justification for approximate equivalent Lden and Lnight (equivalent to LAeq) criteria applied for the assessment of non-residential receptors within Chapter 9.

d. Provide details of how uncertainty applicable to NRRRA design and management measures (e.g. QC system) has been incorporated within the assessment and underpinning input data. Provide details of how it will be ensured that predicted impacts and significance of effect will be no worse than assessed.

e. Include committed developments and zoned population in assessment of significant effects.

f. It should be ensured and clarified that the mode of operation and associated runway usage employed within the assessment is in full compliance with Operation 7b as applicable to existing planning conditions 3(a) – 3(c). The influence of flexibility within this mode of operation and uncertainties surrounding this should be clearly addressed within the assessment.

g. The assessment should demonstrate how uncertainty associated with noise benefits applicable to modernised fleet has been addressed or provide evidence that modernised fleet, in reality, will achieve the relevant noise benefits across the study area.

h. For all assessment scenarios, provide clear justification for, or signposting to, the fleet renewal assumptions and how uncertainty has been accounted for in the assessment. Provide details of how it will be ensured that predicted impacts and significance of effect will be no worse than assessed.

i. Consider identified gaps, uncertainties and recommendations applicable to the assessment within Chapter 9. Including assessments for comparison of With Proposed Development With NRRRA and Without Proposed Development Without NRRRA scenarios. Alternatively, provide appropriate justification for not including this.

j. In line with best practice at other airports, provide discussion of the supplementary metrics and associated context. Provide analysis of additional supplementary metrics, as a minimum, including:

i. - Single mode contours

- ii. - Awakenings
- iii. - Consideration of hourly distribution of noise
- iv. - noise footprints for dominant aircraft types

Assessment of additional awakenings should enable interpretation of assessment at specific locations / spatially. This should be discussed as part of the assessment and, along with other supplementary metrics, should be used to provide a clearer picture of the expected noise environment and how it will change with the Proposed Development

k. Provide information and data to facilitate spatial interrogation of noise level changes relative to absolute noise levels for the air and ground noise study areas. Focus should be given to where the greatest impacts are predicted to occur and should enable interrogation in terms of absolute noise level and noise level change.

l. Provide further discussion and interpretation of annoyance and sleep disturbance results, including discussion on associated health impacts and how this informs and aligns with the assessment of significance.

m. Provide full justification for not assessing single aircraft ground noise events. Consideration should be given to distance to sensitive receptors, type of events / operations, location and frequency of associated aviation activities. Specific consideration should be given to engine testing activities with regard to Objective ET01 of the Dublin Airport Local Area Plan.

n. Provide details of the assumed use of Apron 7, including type and number of operations applicable to the intended use. Provide details of how it will be ensured that Apron 7 will be restricted to the assumed hours of operation and that impacts, and significance of effect will be no worse than assessed.

- 67. The applicant is requested to provide a detailed description of the modes of airfield operation as inputted to the modelling presented in the application of existing and future scenarios and to confirm that these modelled modes of operation are consistent with that which has been permitted by planning permission for the north runway ref: F04A/1755 PL06F.217429 for the purpose of verification of models.
- 68. The applicant is requested to provide a detailed description of flight tracks as inputted to the modelling presented in the application of existing and future scenarios for the purpose of verification of models.

69. The applicant is invited to provide a description of the process of determination and application of flight tracks/Standard Instrument departures/Noise preferential corridors and specific detail as to where they are inputs into modelling for the purpose of assessment.
70. The EIAR and associated figures should be revised and updated to include:
- a. Discussion on excavation and effects on geology, soils and groundwater is presented in a generalised overview manner. A Detailed quantification and assessment on a Project Element by Project Element basis, of the likely effects and impacts of the Proposed Development on geology, soils and on groundwater should be prepared and submitted.
 - b. Detailed site / ground investigation reports and a detailed assessments of the hydrological / groundwater environment and likely impacts on same, in the vicinity of PE5 (the underpass) and PE9 (the central pollution control facility) to be submitted.
 - c. The Construction phase of the Project will require the excavation of significant quantities of soils and interaction with groundwater at the airport. The possibility that these soils have been contaminated by airport-related activities in the past, including by PFASs as referenced in the chapter, has not been adequately addressed or assessed. Reference is made to 'current mitigation measures', as being 'an appropriate approach for safeguarding freshwaters', however, no details of the measures are provided. This should be addressed in detail, specifying appropriate avoidance, mitigation and monitoring measures as required.
71. The EIAR and associated figures and appendices should be revised and updated to include:
- a. Baseline data for existing and proposed hydromorphological quality of the receiving watercourses.
 - b. Information regarding consultation with key stakeholders.
 - c. Information regarding the screening and scoping stage.
 - d. Appendix 11-1 Water Framework Directive should be revised and updated to include:
 - i. Information regarding consultation with the EPA.
 - ii. Clear information on discharge locations from the drainage system.
 - iii. Quantification of flows or expected concentrations of contaminants.
 - iv. More detailed baseline information regarding hydromorphology and hydrology of the existing and proposed receptors to aid a more thorough

assessment of potential impacts.

v. The following in terms of monitoring of water quality:

- The chemicals being used and their properties.
- The breakdown products and their properties.
- Justification of link between TOC / BOD / COD in relation to the chemical contaminants of concern and their properties.
- Justification as to what form of monitoring (preferably multiple lines of evidence e.g. COD and pH and ORP) relates to which chemicals. For example, pH may be of relevance as acids may be generated, but pH have been identified as having no risk in the assessment.

e. The applicant is requested to review and justify the proposed development to seek to remove the requirement for Overflow No. 1 and No. 2 and / or to make such amendments as required to remove the continuing risk of pollution to ground and surface waters.

f. Appendix 11-2 Flood Risk Assessment should be revised and updated to include further information on the modelling used in the Stage 3 assessment of the Flood Risk Assessment. We would anticipate seeing a reference to a technical note, which would include information on the hydrology, model set (including model extents, parameters used), any calibration undertaken, and sensitivity testing. This will allow the reviewer to understand the robustness of the model and, therefore, whether the conclusions at Stage 3 provided in the FRA are sensible.

g. The applicant is invited to address the ambiguity in the wording of the discharge concentration or receiving water concentration. If the 13mg/l is the discharge concentration the applicant should assess the receiving water concentration.

72. EIAR and associated figures and appendices should be revised and updated to include:

a. The Biodiversity chapter takes a notably high-level approach to ecological survey, impact assessment and mitigation. The Legislation, Guidance and Policy sections of the Biodiversity chapter should be reviewed in detail to ensure that they are up-to-date. Full regard should be had to the Fingal Biodiversity Action Plan 2023 – 2030 published in October 2023. Similarly, the Fingal County Development Plan 2023 – 2029 contains numerous biodiversity and green infrastructure policies and objectives. The Infrastructure Application must take these policies into account. For example, the CDP Development Management Standards (DMSO) require the protection and enhancement of biodiversity (DMSO 138) and the

protection of existing landscape (DMSO 140) as well as the provision of green corridors (DMSO 153) and prevention of development along watercourses (DMSO156). The Green Infrastructure and Natural Heritage (GINH) policies/objectives must also be appropriately addressed, including those relating to resilient design (GINHP1), protection of green infrastructure (GINHP2), protection of watercourses (GINHP7), net gain in green infrastructure (GINHP10) and promoting biodiversity net gain in new developments (GINHP14). A new National Biodiversity Plan has been published since the planning application was made, and appropriate reference to relevant policies and objectives in the new NBAP should be made in any updated Biodiversity chapter.

b. Detailed justification and explanation of the Zone of Influence (Zoi) is required, particularly the limiting of the Zoi for National nature conservation designations, locally designated nature conservation sites, Nature Development Areas and records of target ecological features to 2km from the application site. The Zoi for European sites should be clarified.

c. It is not clear that an appropriate level of ecological survey has been undertaken. Surveys took place between November 2018 and May 2023. However, analysis of the information provided appears to confirm that the majority of the survey work took place early on (2019/2020/2021). For example – all of the newt surveys took place in 2021, with another visit in May 2023. Bat surveys took place most recently in 2022. It is doubtful that the validity of the bird survey data submitted can be justified, given its age and geographic spread. The same conclusion applies to the mammal survey work.

d. Other than habitat survey (to Fossitt Level 3) no detailed botanical surveys have been undertaken. The habitat mapping is presented at a scale of 1:9, 000 at A3 – this scale of mapping does not provide enough detail on the habitats and other features that may be present – this is particularly of concern in areas of land that are currently undeveloped, such as in Sector H/Project Element 9 (to the west of the M1 motorway – proposed long term car park) and to a lesser extent Sector J/Project Element 4 (new Apron 7). Given the scale of hedgerow and tree loss proposed, a detailed classification of all hedgerows is imperative, and all biodiversity baseline mapping must be provided at an appropriate scale, e.g. 1:2, 500.

e. A clear description, for each ecological receptor, of how the survey areas relate to the Project Elements/sectors must be provided.

f. Scoping out of features for survey requires robust justification. Each species scoped out should be done so with reference to the specific reasoning (rather than a generic sentence provided). If features are scoped out from survey based on

habitat assessments, it will be important to ensure that the mitigation section adequately addresses their assumed presence.

g. The EIAR states that the Cuckoo Stream is the only watercourse located within the footprint of the development. While the Cuckoo Stream is clearly the most significant watercourse, it is not the only one within the project red line. This is acknowledged in the EIAR but a small part of development element PE4 appears to be very close to the Ward River/Dunbro Stream/Barberstown. Given the fact that the red line for the proposed development includes small sections of that Stream (and the Santry River) a full discussion of potential discharges to streams outside the Cuckoo Stream catchment must be contained within the EIAR Biodiversity chapter.

h. Given the habitats and species confirmed to be present within the application boundary, particularly in Sectors E, H and J which appear to contain significant amounts (by area and length) of woodland, hedgerow and trees, the information provided in the baseline and evaluation sections is not adequate to assist the competent authority in fully evaluating the existing baseline. For example, Sector H is stated to have low suitability for bats. This is unlikely given the habitats present and the number of limitations applied to the survey work.

i. A full and comprehensive analysis of all biodiversity receptors is required. Given the scale of the proposed development, and the habitats and species that appear to be present, a blanket assertion that all the habitats and species present are of no more than Local Importance is not acceptable.

j. No regard has been had to alternative project designs which could retain and protect more habitats (such as hedgerows, wet grassland). No adequate tree protection or removal plan has been provided and the likely amount of hedgerow loss is entirely unquantified, and the impacts of this loss on breeding birds are not justified. A detailed justification of this approach must be provided. In the event that this is not possible, revised plans with clear details on habitat retention and protection throughout the development area must be provided, along with adequate habitat compensation in compliance with the requirements of the Fingal County Development Plan 2023 – 2029 Objectives and the Fingal Biodiversity Action Plan 2023 – 2030 requirements.

k. The statement in the Biodiversity chapter that 'a Negligible Effect (which is not significant) is predicted on internationally designated sites as a result of the operation of the Proposed Development' is not currently supported by the evidence. A full update and revision of the NIS is required.

l. The assessment in relation to Nationally designated sites does not properly define the ZOI or adequately assess predicted impacts). A full reassessment of

potential impacts on these sites (including, for example, on the Sluice River Marsh pNHA) is required.

m. Inland Fisheries Ireland (IFI) has stated in its submission to FCC that the Cuckoo and Mayne Rivers are a non-salmonid system, however IFI are currently assessing the viability of a salmonid reintroduction programme. The Mayne system does contain populations of European Eel and other fish species. The consideration of potential impacts on watercourses in the EIAR does not take account of IFI requirements – and no consultation appears to have taken place with IFI in the preparation of the EIAR. Given the significant long-term development proposals in Sector H (both the airfield drainage elements and long term car park), these consultations are necessary, and the requirements of IFI must be taken into account.

n. Overall greater detail (including detailed survey, evaluation and impact appraisal), for each listed ecological receptor, in each sector, is required before the competent authority has enough information on which to verify the conclusions. Frequently, the conclusion of no significance is not based on an adequate impact assessment. The presence/absence of notable or protected species has not been established in many cases. This lack of information is more acute for sectors E, H and J. There will be significant habitat loss (grassland, wetland habitat, tree lines and hedgerows) and the evaluation of the likely impacts of the habitat loss and associated disturbance (e.g. to birds, badgers and bats) for each receptor is not comprehensively addressed. For example the loss of 0.97km of tree lines and hedgerows to facilitate the construction of New Apron 7 (PE4) is determined to result in a permanent adverse effect of local significance on foraging and commuting bats. The evidence provided does not justify this conclusion of local significance. More detail is therefore required in order to verify all of the conclusions.

o. Cumulative effects in relation to biodiversity appear to be considered only in relation to species 'found at the airport'. The ZOI of the Proposed Development must be fully considered in relation to cumulative effects.

p. It is stated in the EIAR that those impacts predicted to be significant only at the Local, Site or Negligible levels, are considered to be 'Not Significant'. No effects are predicted in the EIAR to be significant on an ecological feature at the County or greater geographic scale. Given the level of habitat loss and disturbance expected and the limited nature of the surveys, evaluations and impact predictions, this conclusion is not justified. The applicant is therefore requested to fully re-evaluate the evaluations and impact assessments presented.

q. Section 12.8 considers that, with the exception of mitigation for the loss of

structures with suitability for roosting bats, mitigation is effectively not required (the measures included are presented as enhancements). Given the inadequate assessment of the impacts of the proposed development, this approach is not justified. Full and detailed drawings and planting schedules for all proposed habitat types are required, to be developed in consultation with a qualified and experienced landscape architect – these mitigation measures will need to be based on the updated habitat surveys and evaluations. It is not clear exactly how the proposed naturalised flood plain will provide compensation for the loss of meadow/wet grassland.

r. As the bat surveys are, in general, inadequate it is not possible to verify whether the mitigation proposed is sufficient. For example, bat boxes may not be appropriate to address impacts. It may also not be possible to mitigate within the agreed scheme limits. Various sections in the EIAR dictate lighting levels near roosts and it will not be possible to ensure this has been included in the design if survey is 'deferred' to the post-consenting space. Deferring survey is not acceptable in ensuring compliance with legislative and policy requirements – fully updated and revised surveys, covering all relevant areas, are required.

s. Comprehensive mitigation measures for fauna are therefore required, once the baseline has been adequately evaluated, and the impacts are appropriately assessed. These measures will be required to address impacts on bats (both roost loss and habitat loss (commuting and foraging) and impacts from lighting), impact on badgers including habitat loss and sett loss, and breeding birds.

73. The EIAR and associated appendices should be revised and updated to include:
- a. Evidence, detail, and clarity regarding design documentation within the Planned Control measures in relation to climatic changes. Clarity should be provided on the planned control measures in the context of the scheme receptors alongside the wider project.
 - b. Confirmation as to whether all or which mitigation measures have been taken forward. Additional detail and evidence is required to demonstrate these commitments - including how and when they might be implemented.
 - c. Additional flights arriving to Dublin Airport as a result of the Proposed Development should be factored into the aviation emissions assessment that has been conducted as part of the EIAR, or further justification should be provided for why only departing flights have been included in the assessment.
 - d. The aviation emissions assessment should be updated to include

additional emissions from private jets or provide further justification for why they have been excluded from the assessment.

e. The significance evaluation of aviation emissions arising from the proposed development is re-evaluated as Moderate to Major Adverse (Significant), in line with IEMA Guidance for Assessing Greenhouse Gas Emissions and Evaluating their Significance.

f. The uncertainty around meeting specific UK Jet Zero Policy targets in the Republic of Ireland should be factored into future aviation emissions projections associated with the Proposed Development, or further justification should be provided for why aviation emissions projections have been aligned with UK Jet Zero Policy.

g. The assessment of construction emissions from the Proposed Development should be updated to include emissions from land use change and water use during construction, or justification should be provided for why these sources have not been included.

h. Clarity should be provided on whether other cement replacement options other than GGBS will be considered to reduce GHG emissions during the construction phase of the Proposed Development, given that GGBS is considered to be a short-term solution.

i. Clarity should be provided on whether both With and Without NRRRA scenarios have been assessed, and if so, GHG emissions results for each scenario should be clearly provided. If the With NRRRA has not currently be assessed, this assessment should be conducted and the results clearly reported to provide analysis of the worst-case scenario associated with the Proposed Development.

j. The following documents identified as missing should be submitted as part, to provide a more complete picture of GHG emissions management during the construction phase, and climate change mitigation proposals for each project element of the Proposed Development:

- Project Element 3 (Terminal 1 Central Search) Sustainability Report.
- Project Element 4 (Apron 7) Sustainability Report.
- Project Element 5 (Underpass Beneath Runway 16/34) Sustainability Report.
- Project Element 6 (Airfield Drainage Project) Sustainability Report.
- Project Element 10 (Staff Car Park North) Sustainability Report.
- Project Element 7 (Ground Transportation Centre) Sustainability Measures.
- Project Element 11 (Junction Improvements) Sustainability Measures.

k. The EIAR and associated appendices should be updated to provide justification for the assumptions that have been applied to the GHG assessment.

l. The annual emissions increase for each year up until 2050 should be appended to Chapter 13 for full transparency on the expected emissions increase over

lifetime of the Proposed Development.

m. Chapter 20 of the EIAR (Interactions and Cumulative Effects) should be updated to provide further information on the cumulative effects of GHG emissions and how effects will be managed.

n. Clarity should be provided on the database that has been used to quantify emissions from the construction phase of the Proposed Development.

74. The EIAR and associated figures and appendices should be revised and updated to include:

a. Provide a detailed description of the cultural heritage environment and assets, a detailed assessment of the potential impacts on the cultural heritage environment and assets, including the Cuckoo Stream, and site specific mitigation measures to avoid, reduce or remediate potential impacts. This should be supported by mapping with appropriate detail and presentation of the immediate context of cultural heritage feature and the effect of the proposed development. In addition, all references and labelling of heritage assets / features should be checked and corrected / updated as necessary.

b. Given the likely presence of significant archaeological material on greenfield areas of the application lands, Project Element Areas PE2, PE4, PE6, PE9, and PE10 should be subject to Geophysical Survey by a suitably qualified and experienced archaeological geophysicist. Depending on results further evaluation / assessments, including examination / test excavation, under appropriate licence may be required. Based on the results, it may be necessary to reconsider the design / layout of proposed development / infrastructure and associated works in the area.

c. In accordance with the Department of the Environment, Heritage and Local Government's Architectural Heritage Protection, Guidelines for Planning Authorities (2011), (as referenced in section 4.5 of Appendix 14.1 of the EIAR) a Conservation Management Plan should be prepared for Castlemoate House (Protected Structure RPS No. 611) and its attendant grounds, indicating the significant heritage and landscape features of the structure and its grounds. The plan should detail how these features will be protected and integrated so that there is no adverse direct or indirect impact on the significant features or to the character of the protected structure.

d. The extent and nature of potential direct and indirect impacts on townland boundaries should be described, assessed and mapped. In this regard, attention is also drawn to Objective DMSO128 – Demarcation of Townland

Boundaries in the Fingal Development Plan 2023-2029.

- e. Appropriate mitigation, including avoidance where appropriate, should be provided where potential for significant impacts are identified.
- f. Prepare and submit to the Planning Authority, a holistic appraisal of the Architectural Heritage of the Entire Airport Complex and DAA lands, including 20th & 21st century buildings, and Assigning of Significance to be carried out by a Conservation Professional with appropriate experience and expertise.
- g. Specific Architectural Heritage Impact Assessments should be prepared and incorporated into a revised and updated Chapter 14 of the EIAR for the Old Central Terminal (RPS No. 612) with appropriate reference to the North Terminal Building; for the Church of Our Lady Queen of Heaven (RPS No. 864); and for Castlemoate House (RPS No. 611).

75. The EIAR and associated figures and appendices should be revised and updated to include:

- a. A tree and hedgerow survey and arboricultural assessment prepared in accordance with the requirements of 'BS 5837: 2012 Trees in relation to Design, Demolition and Construction - Recommendations' is to be prepared for the full extent of greenfield lands within Sectors H & J. The assessment, which should be cross-referenced in the revised / updated Chapter 12: Biodiversity and Chapter 15: Landscape and Visual, should detail and map appropriate tree and hedgerow protection fencing and measures taking particular account of the biodiversity value of the townland boundary hedgerows.
- b. Clarify, or otherwise update, if the appearance / visibility of aircraft in the proposed version of Viewpoint 13: R108 / Old Naul Road at cottages north of 'The Boot Inn' & Viewpoint 14: R108 / Old Naul Road at car park entrance at to 'The Boot Inn', is correct or not.
- c. A detail photomontage of the Proposed Development in Viewpoint 06: Footpath west along Ground Transportation Centre. (wireframe only submitted with application).
- d. Given the change in the physical and visual environment, it is considered that the assessment of visual effects in Table 15-12, for Viewpoint No. 1 substantially under rates the degree of change and impact. Review and clarify or update as required.
- e. Given the significant adverse visual impact arising on areas outside of the airport lands, the applicant is requested to review the proposed development and incorporate appropriate and specific landscape and visual mitigation, including

consideration of boundary hedgerows on the boundary of application lands adjoining Project Elements PE2, PE4 and PE9.

76. The EIAR should be revised and updated to:
 - a. Include waste arising from Project Element 5 Underpass beneath Runway 16/34, which is not referenced in the Chapter.
 - b. Review and clarify the assessment of significance arising from construction waste as being 'not significant', when the waste generation from the Proposed Development equates to 4% (or 5.1% with applied uplift) of the annual national generation of waste for each of 6 years.
77. The EIAR and associated figures should be revised and updated to include:
 - a. The findings of Chapter 15: Landscape and Visual in informing the assessment of amenity effects, or a justification explaining why Landscape and Visual impacts have been excluded from the assessment.
 - b. Clarify the assessment methodology relating to 'amenity' and 'human health'. At present this is not clear, and in part this appears to be due to combining EC guidance on the preparation of EIARs, HUDU guidance on the assessment of Human Health, and (according to paragraph 19.3.11) EPA guidelines, however it is not clear from the text how EPA guidelines have been considered as part of the methodology. At present it is not possible for the reader to determine whether the approach to assessing amenity and human health (as detailed in the 'Amenity and local communities' and 'Human Health and well-being' sub sections) is robust and proportionate.
 - c. Section 19.3 of the Population and Human Health assessment methodology requires further clarification. It is difficult for the reader to determine which criteria have been used as part of the Human Health Assessment, and which relate to the methodology in Chapter 9. The assessment of Human Health relies heavily on the assessment within Chapter 9: Aircraft Noise & Vibration. The methodology for determining 'Annoyance and Sleep Disturbance' as part of the Human Health assessment methodology refers to the proportion of people 'highly annoyed' and proportion of people who are 'highly sleep disturbed'. It is noted however that neither of these elements feed into the assessment of significance within Chapter 9: Aircraft Noise & Vibration (with significance instead assessed based on 'absolute criteria vs absolute change' for noise thresholds). The assessment methodology relating to noise and health should be reviewed, including consideration of appropriate metrics which demonstrate the linkages

between overall health and wellbeing and exposure to noise sources during the day and night time.

d. Section 19.3.37 & 19.3.40 indicated that 'Community resources are detailed in the Current State of the Environment section only where they may be affected by the Proposed Development. Consequently, not all community resources within the study area are mentioned.' Given that the study area for community resources is only 500m from the Proposed Development boundary, the appropriateness of this approach is questioned. Provide a comprehensive baseline which identifies individual community receptors within the 500m Study Area in the Population and Human Health chapter so as to establish a comprehensive baseline.

e. In Section 19.4, there is no identification of the sensitivity of any receptors discussed in the baseline. While criteria are outlined in Section 19.3 - Methodology, Table 19.3 (Amenity and Local Communities) and Table 19.5 (Economic and Employment), these are not referenced in the Current State of Environment section in relation to the receptors identified. A determination of sensitivity for each receptor within the 'current state of environment' section should be provided, which can then be linked with a determination of magnitude in the 'Assessment of Effects and Significance' section.

f. Section 19.7.6 'Amenity and Local Communities Assessment Summary' notes that 'The sensitivity of affected local residents is assessed to be medium...' however no commentary is given to provide justification for this, with no linkages back to Table 19.3. This is the only determination of significance that is provided. Further analysis of how sensitivity has been determined should be provided to afford a greater level of robustness to the assessment. Further information should be provided which identifies the significance of each receptor individually - this could be presented in a tabular format for ease.

g. It is unclear where the estimate of gross construction jobs (2, 320) comes from in paragraph 19.7.20. It is not stated whether this is a Full Time Equivalent (FTE) number of employee jobs, or whether this is a per annum figure. Further clarity and detail should be provided as to where the estimate of gross construction jobs is from (including if this has been provided by DAA group) and what assumptions have been made regarding this figure.

h. In Section 19.7.29 to 19.7.31, it is not stated whether the net employment figure is a Full Time Equivalent (FTE) number of employee jobs, or whether this is a per annum figure. No mention of the duration of construction is provided. The assessment should provide a more in depth and robust analysis of employment generation. Details regarding methodology for determining the gross number of

employees, whether numbers are Full Time Equivalent (FTE) or headcount / duration and per annum information should be clarified and provided.

i. The chapter should be updated as necessary to take account of revisions and amendments to other topic chapters or sections thereof of the EIAR, particularly: Chapter 5: Methodology; Chapter 7: Air Quality; Chapter 8: Non-Aircraft Noise; Chapter 9: Aircraft Noise; and Chapter 15: Landscape and Visual Impacts

78. The EIAR and associated figures and appendices should be revised and updated to include:
 - a. A detailed assessment of the potential environmental effects arising from the interaction between environmental factors. In particular, the potential effects and impacts from interactions arising between biodiversity, soils, hydrology, flooding, heritage and landscape should be fully detailed and assessed.
 - b. A detailed assessment of the potential cumulative effects between the Proposed Development and other projects listed in Tables 20.3 of the EIAR. The assessment presented in the EIAR is high level without specific quantitative detail. In particular, the potential cumulative impact assessment should address the areas of soils, hydrology, flooding, traffic and transportation and waste in detail. Given the location, scale and interaction between the Proposed Development and scheme listed, it is not accepted that no cumulative effects arise. In addition, given the location and nature of the works proposed under permitted developments FCC Reg. Ref. No. F20A/0553, and FS5/017/19, and as no commitment is given to starting / completion dates, this project should be included in Table 20.3 of the EIAR and assessed as noted above.
79. The chapter should be revised / updated as necessary to take account of revisions / updates to mitigation measures and monitoring as revised / updated in Chapters 6 to 21 of the EIAR.
80. The PCEMP is overly generic and should be revised and updated to include site specific environmental management and protection measures applicable to the particular environmental sensitivities of each location and the likely environmental effects of each Project Element.
81. The AASR and NIS and associated figures and appendices should be revised and updated to include;
 - a. The AASR (and therefore the NIS) is based on survey data that is

incomplete and potentially out of date. Comprehensive additional surveys are required, with detailed justifications provided for survey methodologies, survey locations and overall level of survey effort. Additional surveys may include (but are not limited to) winter bird surveys, watercourse surveys (including otters, water quality and other receptors/parameters), habitats, bats. Where further surveys are not proposed, a full rationale for this must be provided.

b. The Zone of Influence requires significant further justification, particularly the air quality disturbance and surface water pathways to European sites, during both construction and operation.

c. The possibility that there will be direct effects on European sites via discharges to either the Barberstown Stream or Santry River, however unlikely, should be addressed.

d. Given the scale of the proposed development a consideration of the potential effects of contaminants diverted to the foul sewer is required (including on the European sites of Dublin Bay via Ringsend WwTP).

e. In-combination effects are not addressed in the AASR and in light of the significant nature of the proposed development, and its clear potential for significant effects on several European sites, full consideration must be given to in-combination effects, particularly in the context of projects which are likely to, or have the potential to, have significant effects on the water environment. A full review of in-combination effects is required, for both the AASR and NIS elements of the report.

f. Dublin Airport operates a Wildlife Management Plan, allowing DAA to disturb birds and to prevent them from flocking at or immediately adjacent to Dublin Airport in the interests of public safety. Given the nature and scale of the proposed development (and the proposed duration of the construction phase), the Wildlife Management Plan should be updated to in a manner that ensures DAA operates the airport in a manner that does not unreasonably impact on the SCI species associated with the coastal European sites.

g. The assessments of potential air and noise impacts on European sites require significant further detail and explanation.

h. The project CEMP shall be fully updated, with detailed method statements as appropriate, to take account of each element of the proposed development.

82. In addition to the foregoing, where the applicant responds to the Further Information request of the Planning Authority and/or any Further Information requested by the Aircraft Noise Competent Authority, the AA Screening Report

and Natura Impact Statement must also be fully reviewed, revised and updated, to take account of any changes to the design or construction methodology, the operational parameters, and the assessment of potential environmental impacts arising as a result of the AI request(s). The applicant should ensure that a comprehensive (and final) NIS is submitted for the final proposal for which consent is sought in order to assist the Competent Authority in making its Appropriate Assessment Determination.

83. The applicant is invited to submit a report setting out details including numbers of staff employed, locations and interdependencies of all uses which the project proposes to displace. This report should include reference to policy provisions such as for cargo and MRO and operational implication such as storage and security procedures relating to cargo prior to loading.
84. For the purposes of clarity on interpretation of conditions and in this instance with reference to what the applicant considers staff parking spaces to which it has an established entitlement the applicant is invited to expand on this and provide details of locations, timing and circumstances of abandonment for which an established use is assumed.
85. The applicant is invited to provide an inventory of buildings across the campus for which there is no current use beyond that of the OTCB as referenced in consideration of architectural heritage.

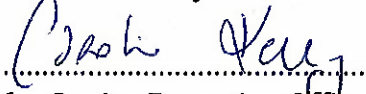
Notes:

1. Where the response to the above requests for further information or any subsequent request or consents which result in any change to the proposal, data supporting the proposal or any potential new or altered impact or assessment of an impact these should be highlighted in the response and the EIAR and NIS should be amended and resubmitted to take any such changes into account.
2. Where there is cross over or repetition between different request items the applicant is requested to respond to each separately, and to demonstrate same in a report / tabular format.
3. The applicant should note that any submission made resulting from the above will be examined and MAY be deemed to be SIGNIFICANT ADDITIONAL INFORMATION. In the event, the applicant will be subsequently notified and requested to re-advertise the changes and will also be advised as to the required format for such advertisements, in accordance with Article 35 of the Planning and

Development Regulations, 2001 as amended.

Please mark your reply "ADDITIONAL INFORMATION" and quote the Planning Reg. Ref. No. given above.

Yours faithfully


.....
for Senior Executive Officer

16 February, 2024.

N.B. In accordance with Article 33(3) of the Planning and Development Regulations 2006, where the above requirement is not complied with, the Planning Application shall be declared to be withdrawn after a period of 6 months.

NOTE: Please note that applicant is required to remove Site Notice on receipt of Notification from Planning Authority of decision.

NOTE: Please note all observations/submissions have been taken into consideration when making this decision.



Aiden Coakley
Coakley O'Neill Town Planning Ltd
NSC Campus
Mahon
Cork, T12 H7AA

Our ref. ANCA/DI-IA 01/2024

01 March 2024

Copy to: Mr Ultan McCloskey
Director of Infrastructure, daa

Re: Direction by the Competent Authority through Section 9(10) of the Aircraft Noise (Dublin Airport) Regulation Act 2019 in relation to planning application F23A/0781 to provide information and assessments for the purposes of an assessment of the noise situation at Dublin Airport.

Dear Mr Coakley,

I refer to the above application for planning permission ref. F23A/0781 (the Application) lodged by Coakley O'Neill Town Planning Ltd on behalf of the airport authority for Dublin Airport (daa) on 15 December 2023.

ANCA has concluded that it is of the opinion that the proposed development the subject of F23A/0781 contains a proposal requiring the assessment for the need for a noise related action.

ANCA is now exercising its power to request information under Section 9(10) of the Act of 2019, which provides that ANCA may, for the purposes of an assessment of the noise situation at the airport, direct the applicant to provide ANCA with such information as ANCA may reasonably require.

ANCA expressly reserves its right to issue further directions to provide information to obtain such subsequent and supplementary information as is reasonably necessary to discharge its statutory functions.

For the avoidance of doubt, this Direction is separate and distinct from the planning authority's request for additional information, dated 16 February 2024.

ANCA has formed the opinion that the Application should be supplemented with additional information for the purposes of the aircraft noise assessment. For this purpose, ANCA



hereby directs, pursuant to Section 9(10)(b) of the Act of 2019, daa to submit the information requested within Appendix A (attached) as soon as practicable.

Any information submitted will be made publicly available to the extent required for ANCA to comply with its legal obligations (whether in respect of public participation or otherwise). It is a matter for daa to ensure – and ANCA will assume without further inquiry that daa has ensured - that the responses contain no personal or commercially sensitive data unless so identified.

If through the course of responding to this Direction, the additional information request made by the planning authority dated 16 February 2024, or for any other reason information within the planning application (relevant to the aircraft noise situation at and around Dublin Airport) is changed or updated, ANCA requires daa to immediately supply to ANCA, full information with respect to such change or update, for the purpose of assessing the noise situation at the airport.

For the avoidance of doubt, this requirement extends to any information provided in associated documentation, including noise assessments, environmental documentation, and any update to the EIAR and the Natura Impact Statement.

In assessing the noise situation at the airport ANCA will have regard to the implications for the aircraft noise situation arising from a decision of other relevant statutory authorities or bodies. For this purpose, the information requested in this Direction, must incorporate the measures arising from any such decision made after the date of this Direction.

Yours sincerely



Ethna Felten
Aircraft Noise Competent Authority

Appendix A

Direction to Provide Information ref. ANCA/DI-IA 01/2024

General Note

1.1 Existing Situation - Operational and Noise Data Requests

Table A: Operational and Noise Data Request.

Request Index	Description
A-1	<ol style="list-style-type: none">1. Flight tracks (from ANOMS in CSV format) and associated operational data (in CSV format) i.e., movement by aircraft type, arrival and departure, route and runway be provided for each aircraft movement for the period 01 January 2023 to 31 December 2023.2. Correlated noise measurement data for each aircraft movement as captured by the airport's noise monitoring terminals (NMTs) in terms of SEL and $L_{A_{Smax}}$ for the period 01 January 2023 to 31 December 2023 from all permanent and temporary NMTs. Where any adjustments are required at each NMT to the measured SEL and $L_{A_{Smax}}$ values to address local conditions these should be clearly reported.3. A complete and defined list of all noise mitigation measures in place at Dublin Airport for the operational year 2023. The dates at which any measures changed throughout the year must also be reported alongside any investigations made with respect to the noise performance of the measures. This must include any investigations that have been carried out in relation to the use of the NADP2 departure procedures, and the westerly north runway departure flight paths in place since February 2023 against the metrics set out within the NAO.4. Records of all runway operations since 1 January 2009 to support the determination and variation of modal split. These records must include as a minimum:<ol style="list-style-type: none">a) time and date of arrival / departureb) runway selectionc) aircraft typed) aircraft destinatione) flight routing5. Records of all meteorology conditions that have occurred since 1 January 2009. These records must include:<ol style="list-style-type: none">a) wind direction

	<ul style="list-style-type: none"> b) wind speed c) temperature d) humidity <p>6. Summary statistics with respect to aircraft operations for the period 01 January 2023 to 31 December 2023 on a daily basis indicating:</p> <ul style="list-style-type: none"> a) total annual aircraft movements by hour b) annual movements by aircraft type c) total quota count of aircraft operations by hour d) passenger numbers e) aircraft destinations f) flight routings g) runway use
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Submission of Relevant Reports and Materials

Table B: Submissions of Existing Reports and Materials

Request Index	Description
B-1	All reports and digital contours, grids and exposure statistics prepared under Sections 19 and 21 of the Act of 2019 since 1 st January 2020.
B-2	All significant further information issued to An Bord Pleanála dated 13 September 2023 (ABP Case Reference: PL06F.314485). This must include digital versions of all noise exposure datasets i.e. grids and contours.
B-3	Noise contours and exposure data as reported under Environmental Noise Directive for the 2021 calendar year as part of the Noise Action Plan process.

Requesting Information Relating to Infrastructure Application

General FI Request in Relation to Noise Exposure Data

Table C sets out general overarching requests that the Applicant is required to observe when providing or returning any new or update noise exposure information to ANCA.

Table C: General Overarching Requests

Request Index	Description
C-1	All noise exposure data provided within the EIAR and ANCA Reporting Template should be submitted with outcomes based on a 2019 population dataset and additionally based on a forecast population based on the assessment year in question.
C-2	Where new scenarios and sensitivity tests are requested in Table D, all noise exposure data must be provided for all metrics set out within the ANCA Reporting Template. Where these new scenarios lead to different forecasts, these should be fully described.

C-3	In the context of sustainable development, as described within the Aircraft Noise Regulation, the Applicant is invited to justify its position as to why no further noise mitigation is proposed with the Application.
C-4	Where operational forecasts or assumptions have been made, such as those relating to departure route use and runway usage, records of any relevant technical consultation or cooperation with AirNav Ireland, IAA, the airport slot coordinators, or airlines, should be provided to support these forecasts or assumptions.

Alternative Scenarios and Sensitivity Tests

The following alternative scenarios and sensitivity tests are requested in **Table D**.

Table D: Additional Scenarios Requested

Request Index	Description
D-1	<p>2023 Existing Situation: The noise situation for the calendar year of 2023 must be provided.</p> <p>Under the Aircraft Noise Regulation and the Act of 2019 the noise situation at the airport is to be assessed in line with Directive 2002/49/EC, which requires the noise mapping to present the situation over the preceding calendar year.</p> <p>The existing situation should be assessed from 1st January to 31st December 2023, inclusive. Revised noise modelling, noise maps, exposure data, health effects and impact assessment are required which correctly reflect the situation in the preceding calendar year.</p> <p>The 2023 existing situation must be assessed based on both the actual i.e. 2023 and additionally the 10-year modal split.</p> <p>Calculated noise exposure levels are requested at each of the Airport's NMTs along with modelled SEL and L_{ASmax} values for the top five dominant aircraft types.</p>
D-2	<p>Interim Forecasts (2024 – 2026):</p> <p>Noise exposure forecasts for 2024, 2025 and 2026 are requested based on a 10-year modal split.</p>
D-3	<p>Alternative Night-Time Situation - (Condition 5 – ABP ref. PL 06F.217429 not in place)</p> <p>An alternative night-time situation is requested for all assessment years and for 'with' and 'without' Proposed Development scenarios in the absence of the application of a night-time limit of 65 flights / night and night-time operation become unconstrained with the exception of Condition 3(d) of the North Runway Planning Permission.</p>
D-4	<p>Slower Fleet Transition</p> <p>All modelling presented in the EIAR and provided in the ANCA Reporting template is based on a single fleet forecast in each assessment year. Subject to Requests E-33 to</p>

	E-36 the Applicant is requested to develop and assess scenarios which consider a slower rate of fleet modernisation than that assumed within the Application.
D-5	Alternative Passenger Throughput Notwithstanding Requests D-3 and D-4, the Applicant shall provide forecasts assuming a maximum passenger throughput of 35mppa in future assessment years.

Information Requests following Review of the Application

Information requests arising from review of the Application are provided in Table E.

Table E Requests Arising from Review of the Application

Request Index	Description
E-1	<p>Worst Case Assessment Year</p> <p>Notwithstanding Requests D-2 and D-4, the determination of the worst-case assessment years presented in the EIAR, Chapter 9: 'Aircraft Noise & Vibration' need to be fully justified. It is requested that this is demonstrated through a quota count for day, evening and night-time periods for the years 2027 to 2046 inclusively.</p> <p>Worst case years from 2027 to 2046 should be identified with respect to overall noise exposure and the potential impact of the Proposed Development.</p> <p>A full description of how the quota counts have been determined must be provided.</p>
E-2	<p>Land Use Planning</p> <p>The information provided does not address the compatibility or otherwise of the Proposed Development with the provisions described in Section 8.5.7(i) of the Fingal Development Plan 2023-2029.</p> <p>For the worst-case assessment year for noise exposure from 2027, the following information is requested:</p> <p>Segregated Mode Contours for the Current situation and with Proposed Development situations</p> <ul style="list-style-type: none"> - Westerly Operations, with arrivals on the North Runway and departures on the South Runway - Westerly Operations, with arrivals on the South Runway and departures on the North Runway - Easterly Operations, with arrivals on the North Runway and Departures on the South Runway - Easterly Operations, with arrivals on the South Runway and Departures on the North Runway. - Westerly and Easterly mixed mode contours assuming equal use of each runway

	Data should be provided for the $L_{Aeq,16hr}$ and L_{night} metrics as digital contours and grids.
E-3	<p>Methodology</p> <p>EIAR Appendix 9-2: 'Air Noise Modelling Methodology' states at Paragraph 9-2.2.1 "Nineteen scenarios, some of which allow for the North Runway Relevant Action (NRRRA), have been included in the air noise assessment".</p> <p>A11524_03_CA150_2.0 ANCA Reporting Template 40mppa Nov 2023.xlsx contains details of 13 assessment scenarios, the six scenarios used for the NAO comparison have not been reported.</p> <p>All nineteen scenarios must be provided in the ANCA Reporting Template.</p>
E-4	<p>Assessment</p> <p>EIAR, Chapter 9: 'Aircraft Noise & Vibration' describes assumptions relating to wake vortex. Evidence is required to demonstrate that wake vortex impacts have been considered and have not significantly changed since the North Runway decision in 2007.</p>
E-5	<p>Assessment</p> <p>All noise exposure values presented in EIAR, Chapter 9: 'Aircraft Noise & Vibration' and Appendix 9.2 and Appendix 9.4 of the EIAR must be presented to 1 decimal place.</p>
E-6	<p>Assessment</p> <p>Confirmation is required whether the noise exposure change assessments presented in EIAR, Chapter 9: 'Aircraft Noise & Vibration', are based on levels of exposure rounded to the nearest integer or not.</p>
E-7	<p>Air Noise Modelling Methodology</p> <p>EIAR, Appendix 9.2: 'Air Noise Modelling Methodology', Paragraph 9-2.3.7 states that "For most aircraft, substitutions are proposed by the AEDT software or the ANP database".</p> <p>Since the Aircraft Noise Regulation came into effect, EASA has the legal mandate to collect and verify ANP data and manage and host ANP legacy data. Legacy ANP data is no longer available from EUROCONTROL at the referenced website.</p> <p>Confirmation is required that up to data ANP data, legacy data, and substitutions were sourced from EASA, and not from EUROCONTROL as indicated</p>
E-8	<p>Air Noise Modelling Methodology</p> <p>EIAR, Appendix 9.2: 'Air Noise Modelling Methodology', Paragraph 9-2.3.7 states that "For most aircraft, substitutions are proposed by the AEDT software or the ANP database".</p> <p>The Appendix does not allow ANCA to verify the details of the substitutions and assignments used in AEDT.</p> <p>A detailed list of substitutions and assignments is required.</p>
E-9	Air Noise Modelling Methodology

	<p>EIAR, Appendix 9.2: 'Air Noise Modelling Methodology', Paragraph 9-2.3.56, and Table 9-2-33, and Table 9-2-34, suggests that the Airbus A321neo has been modelled as A320-271N.</p> <p>ANP data for the A321-271N was published by EASA in May 2021. Detail must be provided as to why the A321neo was modelled using the A320-271N when an A321-271N type was available in 2021.</p> <p>All modelling should be based on published ANP data rather than substitutions where data is available.</p>
E-10	<p>Runway Usage Assumptions</p> <p>EIAR, Appendix 9.2: 'Air Noise Modelling Methodology', Paragraph 9-2.3.22 states that <i>"Consideration has been given to likely exceptions from the typical runway usage"</i>.</p> <p>Evidence should be provided to support the assumptions adopted for the exceptions set out in the paragraph.</p>
E-11	<p>Runway Usage Assumptions</p> <p>EIAR, Appendix 9.2: 'Air Noise Modelling Methodology' describes criteria for mixed mode operations are presented in Paragraph 9-2.3.16.</p> <p>Table 9-2-21 to 9-2-31 should be expanded to present the corresponding movements by arrival or departure for each runway.</p> <p>A description of how runway usage may change due to the Proposed Development is also required. This should be provided in the context of the flexibility afforded through Conditions 3(a)-(c) of the North Runway Planning Permission (Option 7b).</p>
E-12	<p>Departure Route Usage</p> <p>Illustrations of the centrelines of the modelled departure routes must be provided and labelled against the Route Groups set out in EIAR, Appendix 9.2: 'Air Noise Modelling Methodology', Table 9-2-32.</p> <p>The number of departures by route, day, evening and night period for each scenario should also be provided.</p>
E-13	<p>Air Noise Model Validation</p> <p>EIAR, Appendix 9.2: 'Air Noise Modelling Methodology', Paragraph 9-2.3.59 refers to the use of a mobile monitoring terminal in support of air noise modelling validation.</p> <p>The location of the mobile monitoring terminal referenced in 9-2.3.59 should be provided.</p>
E-14	<p>Air Noise Model Validation</p> <p>Further to Request E-13, further description of how data collected at the NMTs to adjust the AEDT default assumptions in EIAR, Appendix 9.2: 'Air Noise Modelling Methodology', Table 9-2-34 must be provided. It is unclear whether the corrections are based on single or multiple NMTs.</p> <p>Justification should be provided as to why the airport's other NMTs were not included in the AEDT validation exercise.</p>
E-15	<p>Air Noise Model Validation</p>

	<p>EIAR, Appendix 9.2: 'Air Noise Modelling Methodology', Paragraphs 9-2.3.59 – 9-2.3.67 describe the adjustments made for each of the AEDT types for the SEL metrics.</p> <p>Adjustments used in the preparation of L_{ASmax} based outputs provided with Application should also be provided responding to Request E-14.</p>
E-16	<p>Noise Quota</p> <p>The assumptions adopted with respect to aircraft types, their respective quota counts and use of the noise quota for the North Runway Relevant Action scenarios must be demonstrated. This includes G3 aircraft in the 2046 scenarios.</p>
E-17	<p>Cargo Operations</p> <p>Details of forecast cargo operations must be provided separately to the overall ATM forecasts provided within the ANCA reporting template. The timing and type of aircraft comprising the forecast cargo operations are to be clearly described.</p>
E-18	<p>Assessment</p> <p>Values for the N65 and N60 metrics must be provided for each of the AR receivers (AR01 – 18) for all scenarios described in EIAR, Chapter 9: 'Aircraft Noise & Vibration'.</p>
E-19	<p>Assessment</p> <p>Digital noise contours and grids are to be provided for the N65 and N60 metrics. These must be provided for the current situation (Request D-1) and as average westerly and easterly days with and without the Proposed Development.</p>
E-20	<p>Assessment</p> <p>Annual average easterly and westerly days are requested for the L_{day}, $L_{evening}$, L_{night} and $L_{Aeq,16hr}$ metrics.</p>
E-21	<p>Assessment</p> <p>Subject to the identification of the worst-case assessment year, the effect of the Proposed Development on objective awakenings is requested.</p>
E-22	<p>Non-residential receptors</p> <p>All non-residential noise-sensitive receptors i.e. schools, hospitals, nursing homes exposed to at least 45 dB L_{den} across the scenarios and considered to be overflowed by the airport's arrivals and departures are to be identified and noise exposure data demonstrating changes due to the Proposed Development in the worst case assessment year provided for both 100% westerly and easterly conditions for the L_{day}, $L_{evening}$, $L_{Aeq,16hr}$ metrics, and for schools, the $L_{Aeq,T}$ representative of school hours. L_{ASmax} and N65 data is also required.</p>
E-23	<p>Assessment</p> <p>For sensitive receptors within 500m of the airfield boundary forecast levels of air and ground noise for each scenario are required to allow a full evaluation of the combined noise impacts.</p>
Requests Relating to Fleet Modernisation Report (Part 4, Appendix 9.7)	
E-24	<p>ATM Forecasts</p> <p>In EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic' the Applicant should explain any evolution, changes or reuse of the information provided within the</p>

	Report against that relied on from the Relevant Action application and as submitted to An Bord Pleanála as part of further significant information.
E-25	ATM Forecasts Busy hour demand rates should be provided for the 32mppa and 40mppa scenarios split by arrivals and departures. These rates should be provided for all scenarios described within EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic'.
E-26	ATM Forecasts In addition to scenarios presented in EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic', an unconstrained demand forecast is required. The assumptions supporting this forecast should be provided alongside a breakdown of the passenger forecast by segment (i.e. domestic, international short haul, long haul, and/or by carrier) and by day, evening and night-time periods.
E-27	ATM Forecasts In EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic', further description of Scenarios B and D are required taking into account the actual number of passenger movements in 2023. The Applicant is requested to demonstrate whether the ATM forecasts for all 32mppa scenarios have been based on 2023 operations as were scheduled or as constrained by other consents.
E-28	ATM Forecasts The Applicant is requested to provide a narrative on the validity of the forecasts for the future 32mppa forecasts based on the operations and passenger throughput that occurred in 2023.
E-29	ATM Forecasts EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic', Scenario C indicates that up to the point that the annual cap is hit, the forecast is aligned to the unconstrained demand. Confirmation is required that the noise quota in the with NRRRA would no longer be limiting movements in the night-time period. To confirm this observation, the aircraft type assumptions by carrier and by year are required. This information is also required in relation to Scenario B.
E-30	ATM Forecasts EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic' states that "The busy day traffic was then converted in annual equivalents in order to assess the overall impact of constraints on airport throughput." The methodology for determining the annual passenger forecasts from the busy day schedules is unclear. For example, are flights removed from the busy day night period also removed from the night period on less busy days of the year when they could potentially have been accommodated. Further description of the methodology is required.
E-31	ATM Forecasts EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic' states that night cargo flights grew significantly during the pandemic. However, the report only provides outturn data for 2019. The forecast for 2025 is only marginally higher than the 2019 outturn figure.

	<p>Outturn figures for the 2023 night period cargo ATMs are required to validate the stated increase in cargo ATMs.</p>
E-32	<p>ATM Forecasts</p> <p>In EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic' the fleet renewal information provided is relatively high level. Justification is required as to whether 2019 remains an appropriate reference point for the updated fleet forecasts and whether these would be different if based on 2023 schedules and fleet.</p> <p>Provide details of fleet breakdown based on 2023, rather than that based on 2019, a year which was followed by a period of flux related to the pandemic. Justify whether the fleet forecasts remain valid based on a 2023 reference point.</p>
E-33	<p>Fleet Renewal</p> <p>In EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic' the mix of G1, G2 and G3 aircraft should be presented for each of the scenarios, <u>and</u> by ICAO noise chapter. This should be provided in support of Request D-4. The response should clearly set out which aircraft are categorised as G1, G2 and G3 aircraft.</p>
E-34	<p>Fleet Renewal</p> <p>In EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic', clarification is required as to whether all the forecast scenarios presented in the Report and adopted for assessment purposes for the scenarios adopted within the EIAR utilise the same fleet renewal assumptions or not.</p>
E-35	<p>Fleet Renewal</p> <p>In EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic' the benefits associated with fleet renewal must be described with respect to anticipated aircraft noise event levels ($L_{A_{Smax}}$ and SEL).</p> <p>As a minimum, modelled values for each aircraft type should be provided at all AR receptors and at the NMT locations used for noise model validation purposes.</p>
E-36	<p>Fleet Renewal</p> <p>In EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic' the Report recognises that <i>"the pace of Ryanair's DUB fleet renewal is largely a strategic choice for the airline."</i> and as such fleet renewal is an area of relative uncertainty.</p> <p>Further description of the uncertainties that exist within the forecast fleets is required. A sensitivity test is necessary to determine whether the effects of the Proposed Development may be different should fleet renewal be slower than the rate assumed.</p>
E-37	<p>Passengers Per ATM</p> <p>In EIAR, Appendix 9.7: 'Quantification of Impacts on Future Traffic' the forecasts from 2027 to 2040 appear to assume that there is no change in the average annual pax per ATM. The justification and evidence for this assumption is required.</p>
E-38	<p>Environmental Charges</p> <p>Evidence is requested to demonstrate what effect the Applicant's new environmental charging regime has had on the fleet and ATM forecasts. This should include details of the environmental scheme and conditions of use.</p>

E-39	<p>NAO Assessment</p> <p>The Ricondo Memorandum 'daa_DUB_IA_598 NAO assessment_11.12_23' makes reference to documents prepared by Bickerdike Allen Partners and Ricondo & Associates. The applicant must provide all original modelling reports for any modelling work carried out by Bickerdike Allen Partners and Ricondo & Associates.</p>
E-40	<p>NAO Assessment</p> <p>The Ricondo Memorandum 'daa_DUB_IA_598 NAO assessment_11.12_23' presents assessments against the Noise Abatement Objective for Dublin Airport. It is requested that assessments provided in this memorandum are presented using forecast populations for the assessment years and scenarios considered.</p>
Other Environmental Requests	
E-41	<p>Bird Surveys</p> <p>The Applicant is requested to justify why bird survey data at the European sites collected in 2016 - 2018 and informing the Natura Impact Statement (page 39) is considered to be robust in informing the Appropriate Assessment conclusions made with regard disturbance to birds caused by additional overflying of these sites.</p>
E-42	<p>Natura Impact Statement</p> <p>The Applicant is requested to confirm whether the heading of the fifth column of Tables 6 and 7 of the Natura Impact Statement is correct or whether in fact they should refer to the 'with proposed development' assessment case.</p>
E-43	<p>Climate Change</p> <p>EIAR Chapter 13, Paragraph 13.3.28 indicates inconsistency with the air quality chapter with respect to the inclusion of Auxiliary Power Unit (APU) emissions. The Applicant is requested to clarify whether these emissions have been accounted for in its assessment of Climate Change.</p>
E-44	<p>Climate Change</p> <p>EIAR Chapter 13 states that emissions from aviation have been calculated using EMEP/EAA Emissions Calculator. No flight schedule or fleet mix and the corresponding emissions is provided in Appendix 13.1. This is requested.</p>
E-45	<p>Climate Change</p> <p>EIAR Chapter 13 makes references to a 2021 Mott MacDonald report 'Dublin Airport Operating Restrictions: Quantification of Impacts on Future Growth May 2021 Update – 2022-2025 Period'. This report is not included in the Application and the applicant is required to submit this report. The Applicant is also requested to confirm that the assessment of climate change is consistent with the forecasts provided for the future assessment years.</p>

E-46	<p>Climate Change</p> <p>Further clarity is requested with respect to the EIAR Chapter 13, Table 13-1 and the ATM projections provided for the with and without Proposed Development scenarios presented.</p>
E-47	<p>Consistency</p> <p>The Applicant is requested to demonstrate that the approach to modelling emissions sources within EIAR Chapter 7 'Air Quality' and EIAR Chapter 'Climate Change' is consistent with those adopted in Chapter 9 'Noise'.</p>

END OF APPENDIX A

APPENDIX D
FURTHER INFORMATION



Submission on behalf of SMTW Environmental DAC

TO AN BORD PLEANALA'S RFI REQUEST #2 FOR CASE 314485

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SUBMISSION ON BEHALF OF SMTW ENVIRONMENTAL DAC

0.0 Executive Summary

0.1 Executive Summary

The main points raised in this submission regarding the daa's response to the Board are as follows:

- The response from the daa should be deemed '*Significant*' by the Board
- The new contours show that the flight paths in operation at Dublin Airport are in violation of Condition 1 of the North Runway's planning permission.
- Dependent Mode operations are the only operations that would comply with planning permission as expressed by the Chief Executive of the IAA
- A large population affected by the new maps have not been afforded the opportunity by the Board to comment on the maps.
- Over 200 dwellings are newly highlighted as being exposed to greater than 55 dB Lnight or greater than 50dB with a +9dB increase.
- Over 40 dwellings are removed from the eligibility contour.
- Properties incorrectly labelled as having conditions of planning that would affect a possible nighttime insulation scheme.
- The Board is required to carry out a Regulatory Process and make a Draft Regulatory Decision and put it out for Public Consultation, as required by the Aircraft Noise (Dublin Airport) Regulation Act 2019
- The population greater than 55 dB Lnight failed the NAO in 2022
- The population greater than 55 dB Lnight failed the NAO in 2023 significantly.
- Current flight operations at Dublin Airport are in violation of the Fingal Development Plan.
- The implications of this application are far greater than a '*Relevant Action*' application (section 34C) and a full planning application is required.
- Dublin Airport breached the 32m passenger cap in 2019 handling 32.9m passengers.
- Dublin Airport breached the 32m passenger cap in 2023 handling 33.522m passengers.

- No Significance of the noise situation compared to that assessed in the 2007 parent planning permission has ever been carried out. Significance was not identified in the original Planning permission as documented in the Inspector's report.
- There are dwellings in Noise Zone A which are not identified for insulation.
- There are properties that suffer both a high level of daytime and nighttime noise that are not part of any insulation plans.
- The insulation schemes should be based on single mode operations, similar to the Noise Zones in the Fingal Development Plan.
- There are sections of the map that are not included in a zoomed-in map and therefore it's impossible for the Board to identify all properties.

I.0 Noise and Fingal Development Plan 2023-2029

I.1 Noise Zones

In section 8.5.7 of the Fingal Development Plan, it notes that:

“Noise zones relating to Dublin Airport have been in place for many years to aid land use planning. Previous noise zones dated back to 2005 and as such it was considered appropriate to update the noise zones for Dublin Airport to allow for more effective land use planning for development within airport noise zones.”

The noise zones related to Dublin Airport were updated in 2019 to allow for more effective land use planning for development within airport noise zones. The updated policies relating to development in noise zones are set out in Variation #1 of the Fingal Development Plan 2017-2023 and these apply in the Plan.

We note that at the time of Variation #1 of the previous plan this variation was advertised for public consultation. In the end the Councillors voted to include the variation in the development plan and also voted that the same policies should be included in the new development plan 2023-2029. The maps as presented in both cases were adopted within both development plans and became part of the development plan.

Further on in section 8.5.7 of the Development Plan, it states that:

“The noise zoning system has been developed with the overarching objective to BALANCE the potential impact of aircraft noise from the Airport on BOTH external and internal noise amenity.”

The Aircraft Noise Zones are defined at Table 8.1 of the Development Plan. Note that Zone A, the area enclosed by the Zone A contour has an L_{night} value greater than 55dB. The same applies to the area enclosed by the contour for Noise Zone B with L_{night} greater than 55dB. However, the area enclosed by the Noise Zone C contour and between the Noise Zone B contour has an L_{night} value less than 55dB. These contours were developed in consultation with the daa and included a single mode of operation in order to provide realistic conservative contours for the Noise Zones for aircraft activity at Dublin Airport. All of this was related to the communities during the consultation process leading up to the Councillors voting in the Variation #1.

Table 8.1: Aircraft Noise Zones

Zone	Indication of Potential Noise Exposure during Airport Operations	Objective
D	≥ 50 and < 54 dB LAeq, 16hr and ≥ 40 and < 48 dB Lnight	To identify noise sensitive developments which could potentially be affected by aircraft noise and to identify any larger residential developments in the vicinity of the flight paths serving the Airport in order to promote appropriate land use and to identify encroachment. All noise sensitive development within this zone is likely to be acceptable from a noise perspective. An associated application would not normally be refused on noise grounds, however where the development is residential-led and comprises non-residential noise sensitive uses, or comprises 50 residential units or more, it may be necessary for the applicant to demonstrate that a good acoustic design has been followed. Applicants are advised to seek expert advice.
C	≥ 54 and < 63 dB LAeq, 16hr and ≥ 48 and < 55 dB Lnight	<p>To manage noise sensitive development in areas where aircraft noise may give rise to annoyance and sleep disturbance, and to ensure, where appropriate, noise insulation is incorporated within the development. Noise sensitive development in this zone is less suitable from a noise perspective than in Zone D. A noise assessment must be undertaken in order to demonstrate good acoustic design has been followed.</p> <p>The noise assessment must demonstrate that relevant internal noise guidelines will be met. This may require noise insulation measures. An external amenity area noise assessment must be undertaken where external amenity space is intrinsic to the development's design. This assessment should make specific consideration of the acoustic environment within those spaces as required so that they can be enjoyed as intended. Ideally, noise levels in external amenity spaces should be designed to achieve the lowest practicable noise levels. Applicants are strongly advised to seek expert advice.</p>
B	≥ 54 and < 63 dB LAeq, 16hr and ≥ 55 dB Lnight	To manage noise sensitive development in areas where aircraft noise may give rise to annoyance and sleep disturbance, and to ensure noise insulation is incorporated within the development. Noise sensitive development in this zone is less suitable from a noise perspective than in Zone C. A noise assessment must be undertaken in order to demonstrate good acoustic design has been followed. Appropriate well-designed noise insulation measures must be incorporated into the development in order to meet relevant internal noise guidelines. An external amenity area noise assessment must be undertaken where external amenity space is intrinsic to the developments design. This assessment should make specific consideration of the acoustic environment within those spaces as required so that they can be enjoyed as intended. Ideally, noise levels in external amenity spaces should be designed to achieve the lowest practicable noise levels. Applicants must seek expert advice.
A	≥ 63 dB LAeq, 16hr and/or ≥ 55 dB Lnight	To resist new provision for residential development and other noise sensitive uses. All noise sensitive developments within this zone may potentially be exposed to high levels of aircraft noise, which may be harmful to health or otherwise unacceptable. The provision of new noise sensitive developments will be resisted.
Notes:	<ul style="list-style-type: none"> ➤ 'Good Acoustic Design' means following the principles of assessment and design as described in ProPG: Planning & Noise – New Residential Development, May 2017; ➤ Internal and External Amenity and the design of noise insulation measures should follow the guidance provided in British Standard BS8233:2014 "Guidance on sound insulation and noise reduction for buildings" 	

We note in Objective DA011 in the Development Plan that it is stated:

“To accept that time based operational restrictions on usage of the runways are NOT UNREASONABLE to minimise the adverse impact of noise on EXISTING HOUSING within the inner and outer noise zone.”

Objective DAO11 – Requirement for Noise Insulation

Strictly control inappropriate development and require noise insulation where appropriate in accordance with Table 8.1 above within Noise Zone B and Noise Zone C and where necessary in Assessment Zone D, and actively resist new provision for residential development and other noise sensitive uses within Noise Zone A, as shown on the Development Plan maps, while recognising the housing needs of established families farming in the zone. **To accept that time based operational restrictions on usage of the runways are not unreasonable to minimise the adverse impact of noise on existing housing within the inner and outer noise zone.**

Objective DA015 in the Development Plan states:

“Review the operation of the Noise Zones on an ongoing basis in line with the most up to date legislative frameworks in the area, the ongoing programme of noise monitoring in the vicinity of the Airport flight paths , and the availability of improved noise forecasts”.

Objective DAO15 – Ongoing Review of Operation of Noise Zones

Review the operation of the Noise Zones on an ongoing basis in line with the most up to date legislative frameworks in the area, the ongoing programme of noise monitoring in the vicinity of the Airport flight paths, and the availability of improved noise forecasts.

To date there has been no variation put forward to change the Noise Zones in the current Fingal Development Plan and therefore those as set out above are in force at present and were in force when the Relevant Action was submitted for planning.

We also note that during the Consultation on Variation #1 we were informed that the contours represent the worst-case scenario that will occur due to aircraft noise from Dublin Airport. We note that there was no mention of “*Very Significant*” noise effects which are defined as residents exposed to greater than 50dB L_{night} and experiencing a greater than +9dB noise increase above their baseline. This is not included in the Noise Zones or Development Plan relating to aircraft noise from Dublin Airport and no eligibility contour for this situation are including in land use planning.

In section 14.3 of ANCA’s Regulatory Decision Report, it outlines this second criterion of the Residential Sound Insulation Grant Scheme (RSIGS) for the “*Very Significantly*” affected.

“Additionally, the scheme will help to mitigate the effects on those who become newly exposed to potentially harmful levels of aircraft noise. The Application proposed a second criterion for eligibility to the proposed scheme. This criterion would have the effect of limiting the availability of noise insulation grants to those who experience a ‘very significant’ effect as a result of the Application. This occurs where a dwelling is forecast to experience noise exposure of at least 50 dB L_{night} and an increase in noise exposure of at least 9 dB when compared to the current permitted operation. The Application has proposed that subsequent eligibility will be on forecasts for the first year of the Relevant Action and would be a ‘one-off’ in terms of the area of eligibility and would therefore not be subject to any annual review. ANCA recognises that a scheme of this nature would help mitigate the effect of those who become newly exposed to night time aircraft noise below the priority value.”

The contours outlining the amended Eligibility Boundary are indicated in Figure 14.1 in section 14.3 of the Regulatory Decision Report:

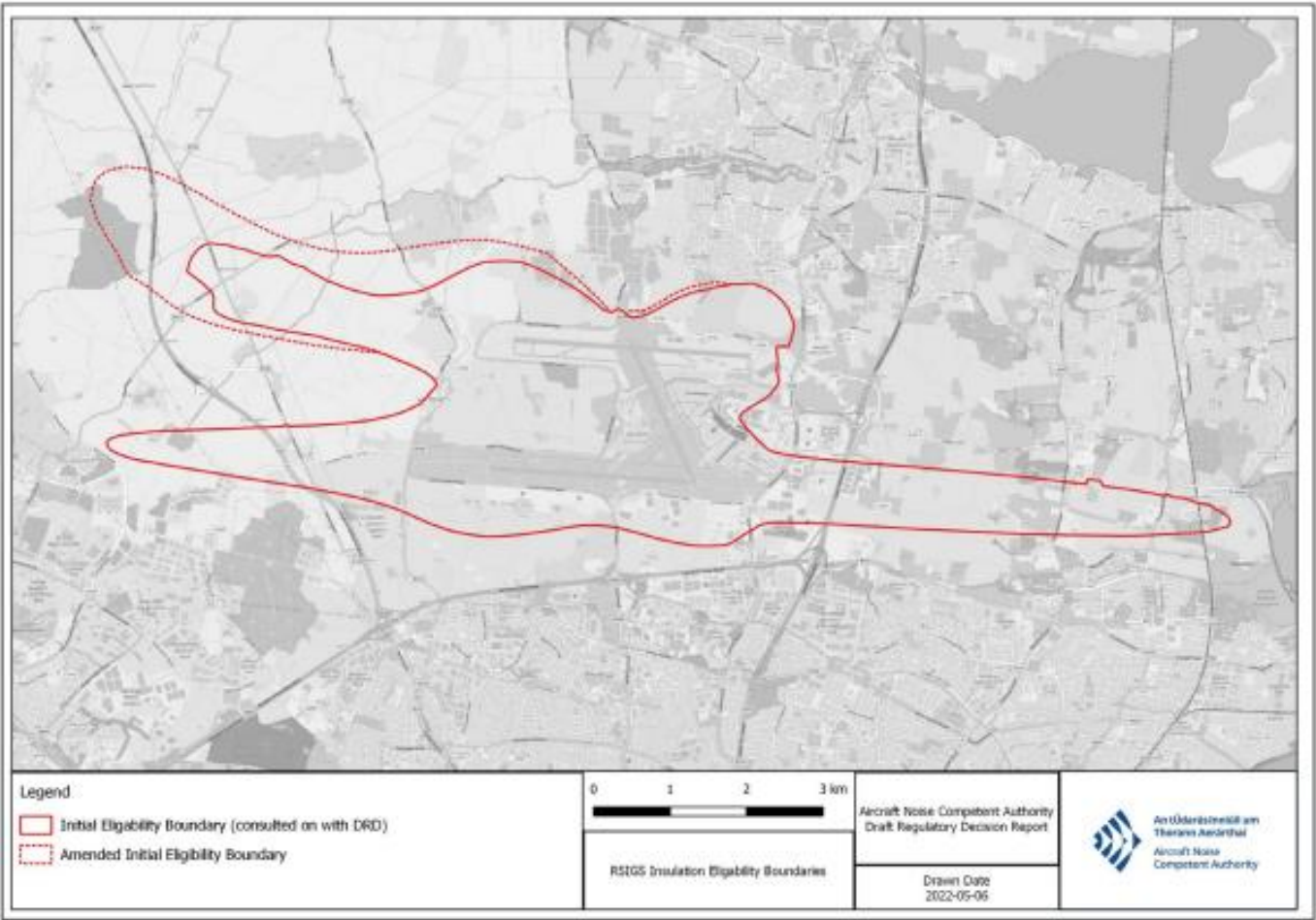
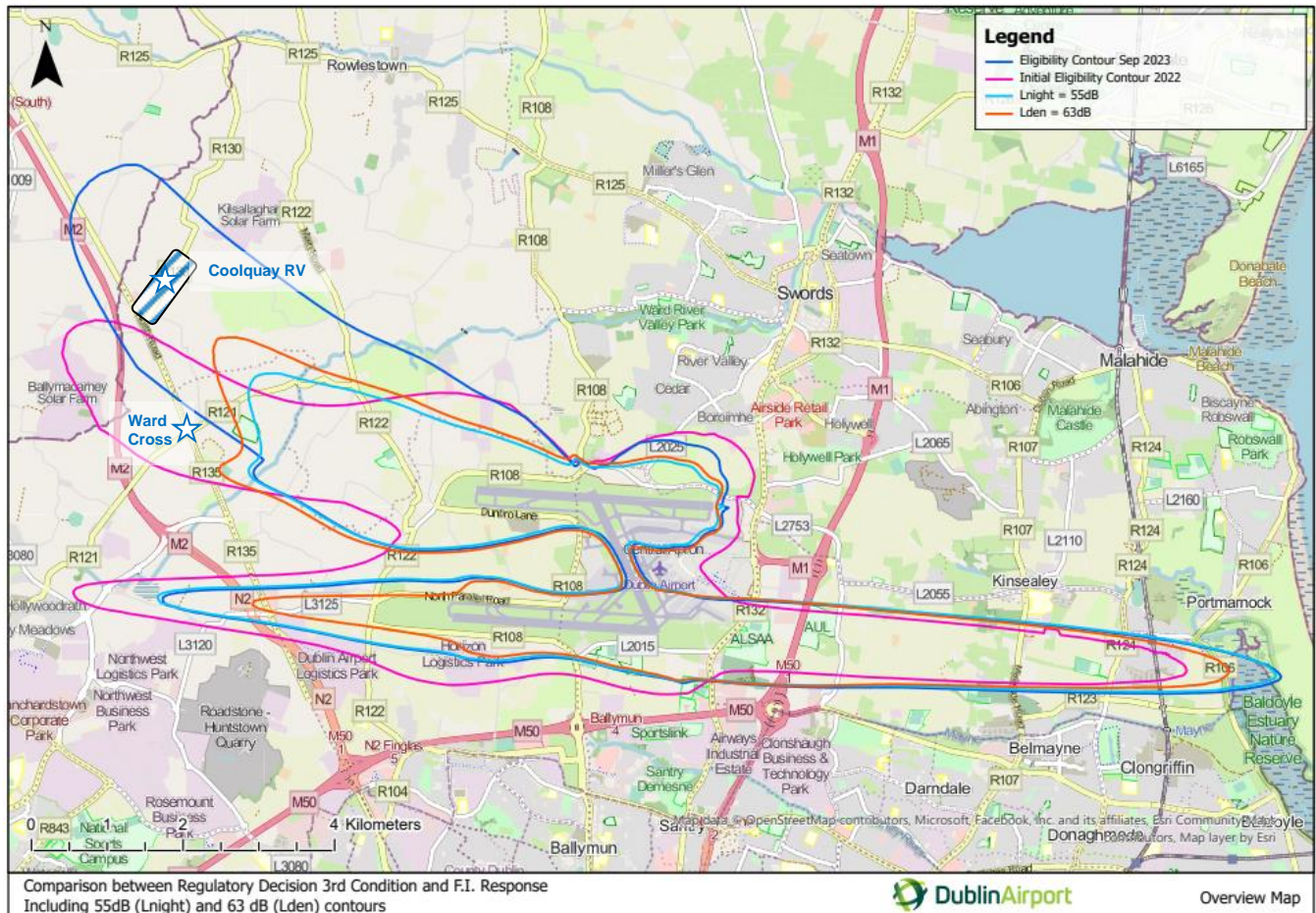


Figure 14.1 – RSIGS Initial Eligibility Boundaries

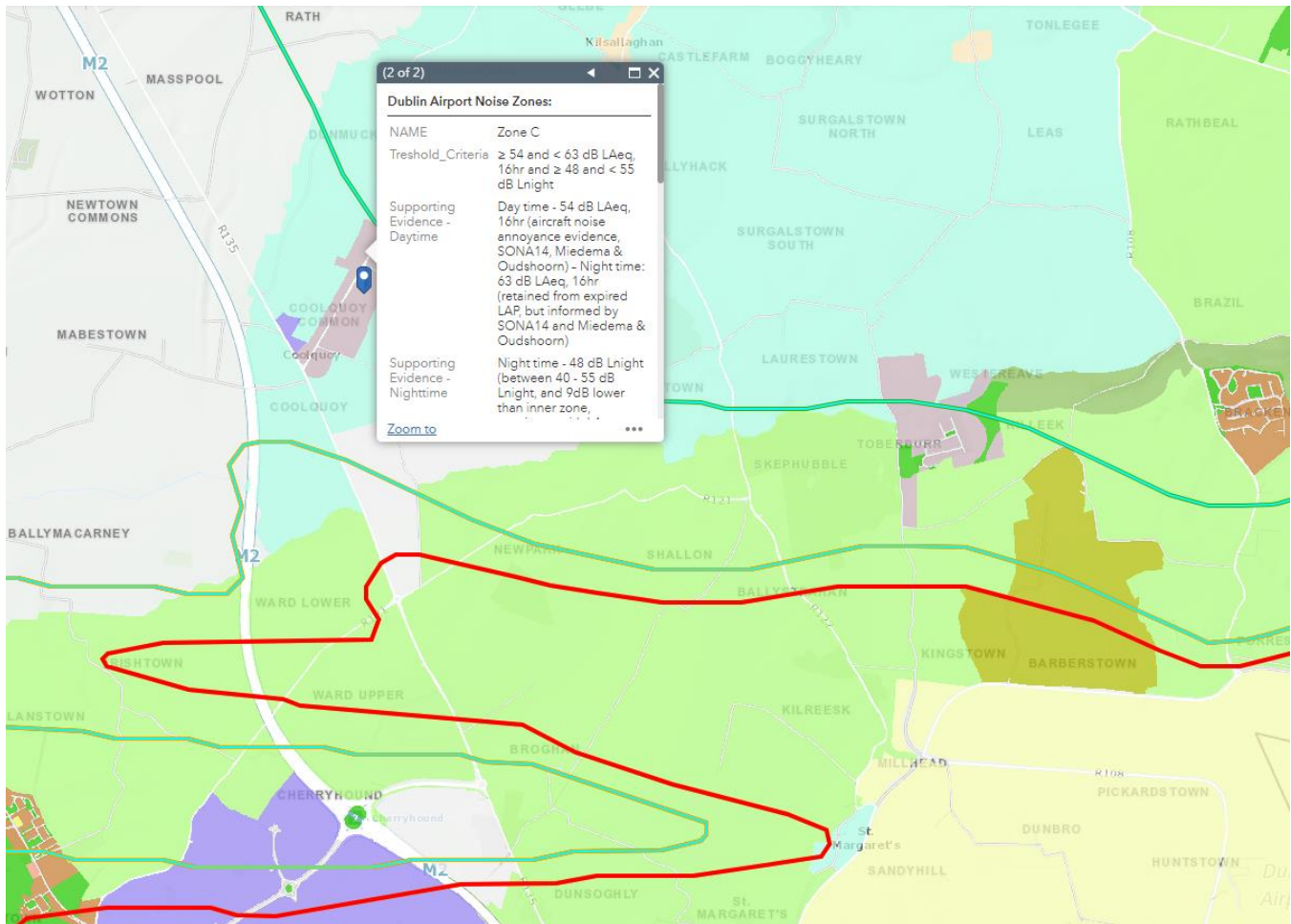
I.2 Revised Maps Submitted by the daa

Below is a copy of the Overview Map submitted by the daa to ABP in March 2024. We have noted the locations of Coolquay Rural Village (Local Area Plan area shaded in blue) and the location of the Ward Cross.



The image below is from Fingal County Council's online Development Plan Map Viewer. The image highlights the Coolquay Rural Village within the Development Plan. Coolquay Rural Village is located within Zone C of the Development Plan and adjacent to Zone D. Note the Noise Threshold Criteria for Zone C is:

- ≥ 54 and < 63 dB LAeq16 and
- ≥ 48 and < 55 dB Lnight



The Description of the Objective of a Rural Village is:

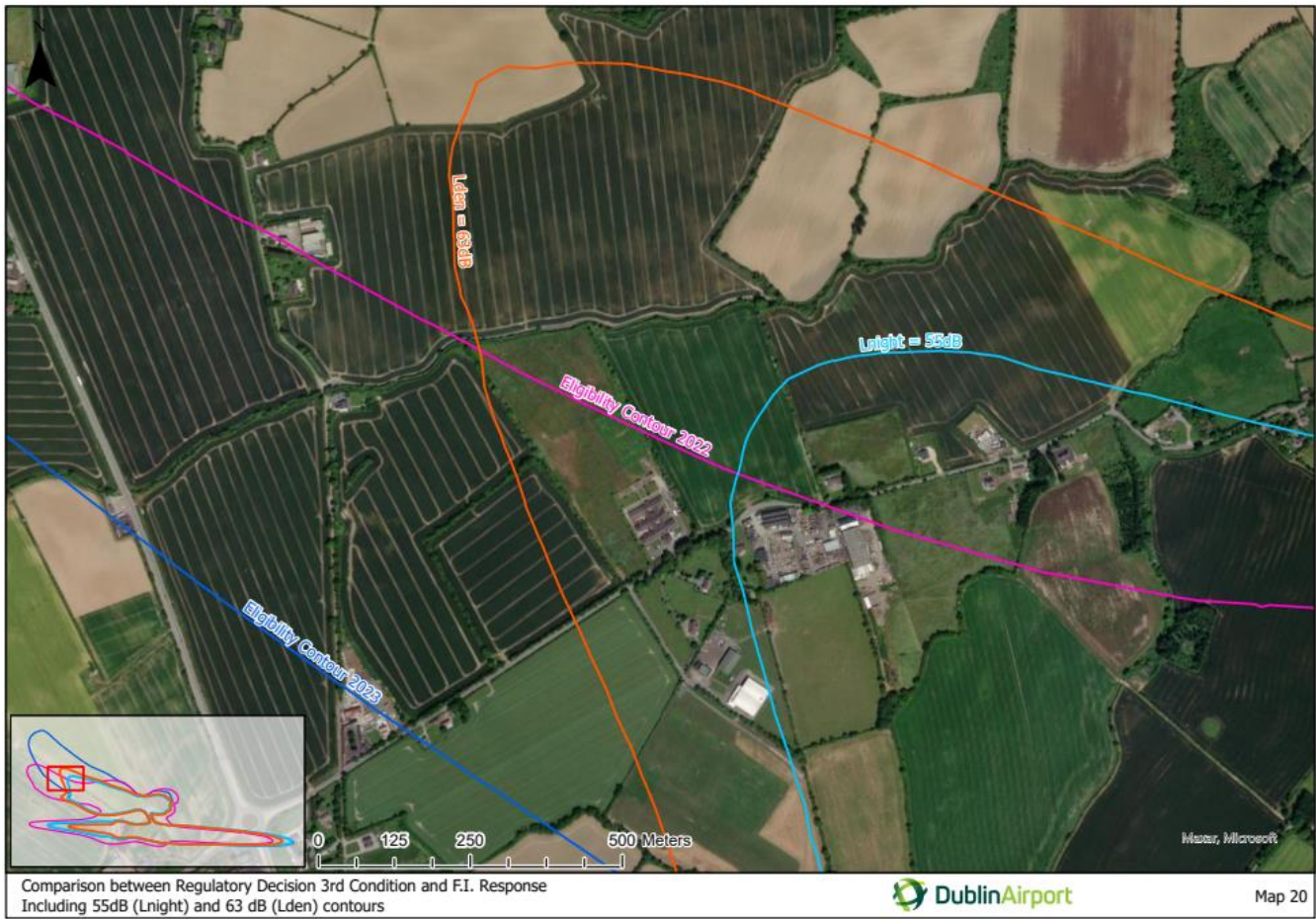
“Protect and promote the character of the Rural Village and promote a vibrant community in accordance with an approved land use plan, and the availability of physical and community infrastructure.”

The Vision of the Objective for Rural Village is described as:

“Protect and promote established villages within the rural landscape where people can settle and have access to community services, including remote work hubs. The villages are areas within the rural landscape where housing needs can be satisfied with minimal harm to the countryside and surrounding environment. The villages will serve their rural catchment, provide local services and smaller scale rural enterprises. Levels of growth will be managed through approved land use plans to ensure that a critical mass for local services is encouraged without providing for growth beyond local need and unsustainable commuting patterns.”

SUBMISSION ON BEHALF OF SMTW ENVIRONMENTAL DAC

Below is Map 20 as submitted by the daa and indicates the Lnight contour for 55dB as revised.

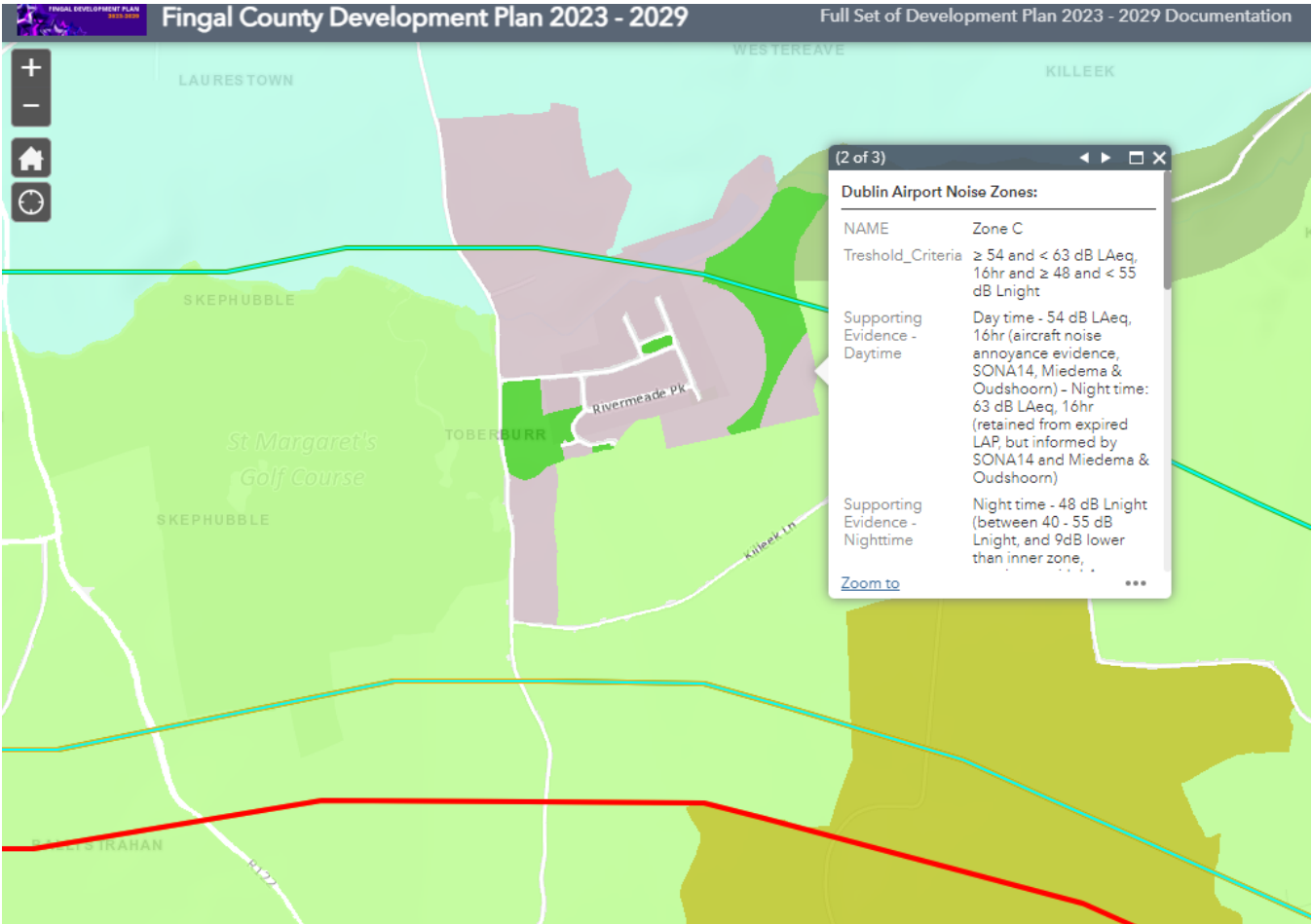


SUBMISSION ON BEHALF OF SMTW ENVIRONMENTAL DAC

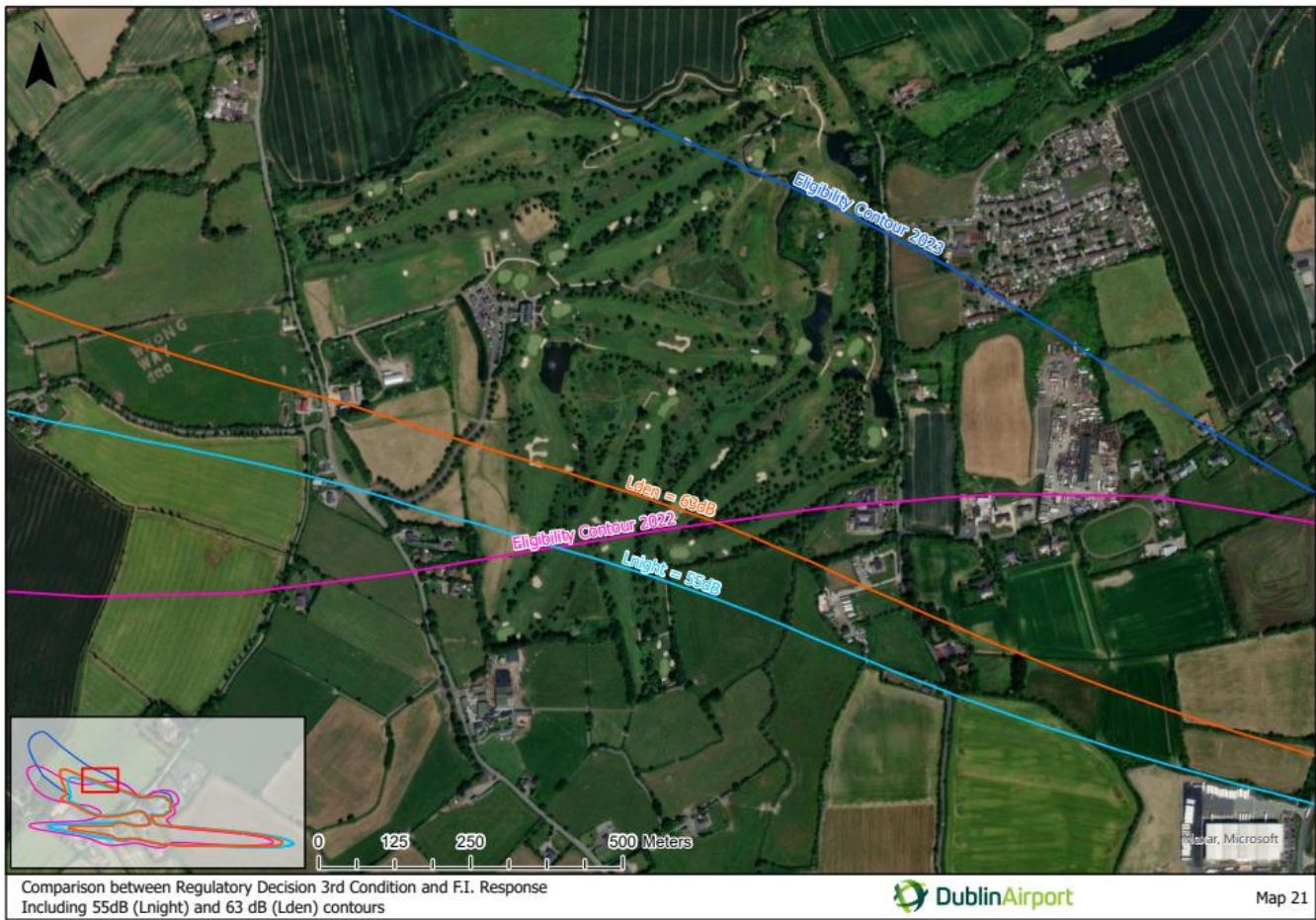
Below is the Fingal Development Plan Noise Zones for the same area as above with the contour for 55dB Lnight as per Map 20 above drawn on it and the additional area now with Noise Zone B as a result shaded in light blue.



The following image is an extract from the Fingal Development Plan Map Viewer indicating the Noise Zones adjacent to Rivermeade Local Area Plan, highlighting that Rivermeade is in Zone C.



Below is Map 21 as submitted by the daa to ABP in March 2024.



SUBMISSION ON BEHALF OF SMTW ENVIRONMENTAL DAC

The following image is the equivalent area with the new 55dB L_{night} contour drawn on it, highlighting the additional area now being added to Noise Zone B shaded in light blue.



I.3 Material Contravention of Fingal Development Plan

As indicated, the noise contours as presented by the daa push the Zone B noise contour zone further North and are therefore in material contravention of the Fingal County Council Development Plan. The daa have not followed the correct procedure in dealing with a material contravention and therefore surely the Board must invalidate this application accordingly.

The question has to be asked:

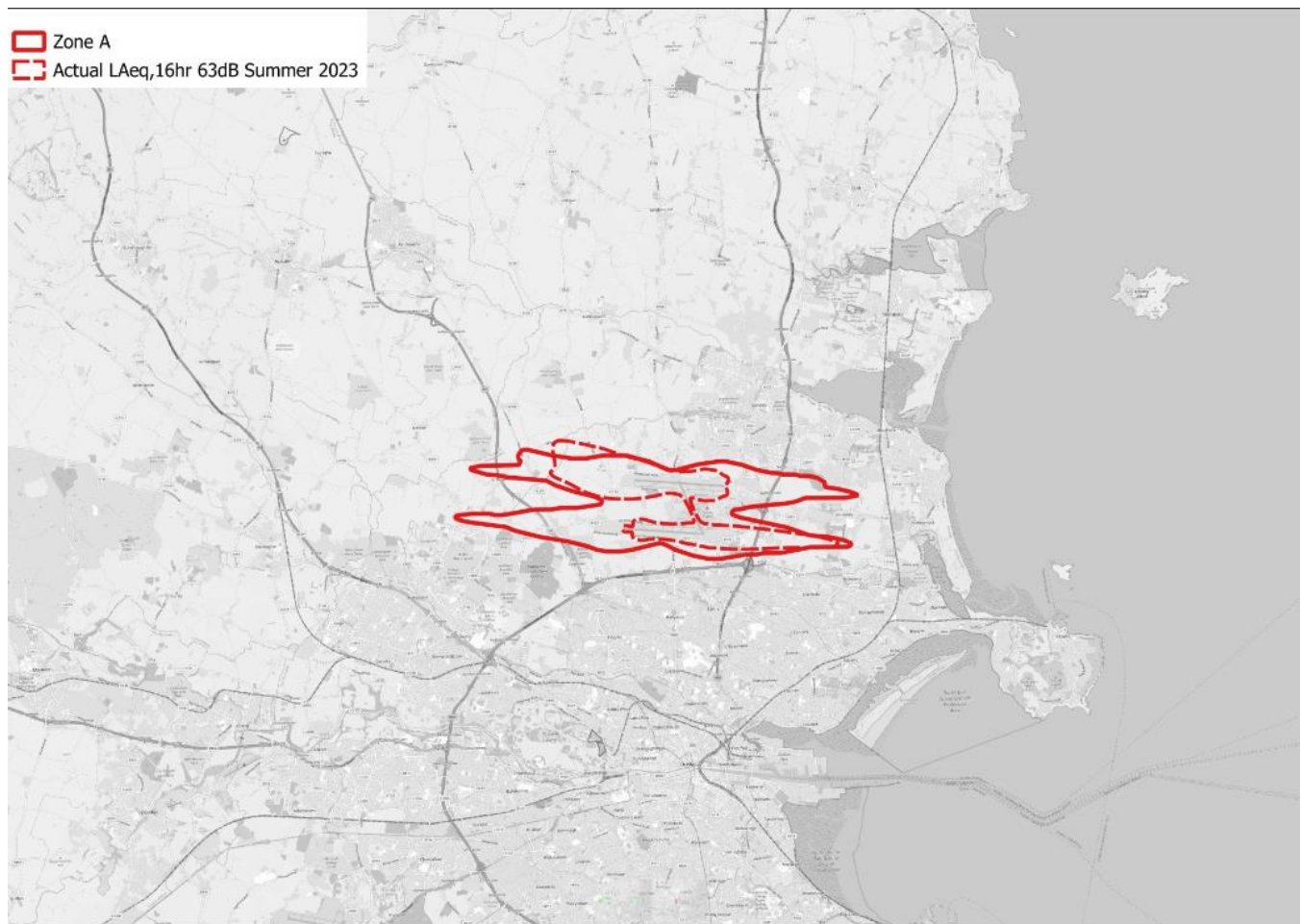
“Why are the daa only now coming forward with this information, over 3 years into the application?”

None of this information was presented to ANCA for its Regulatory Decision or to Fingal County Council when they made their decision. This is a completely different application with huge consequences for The St. Margarets The Ward Communities.

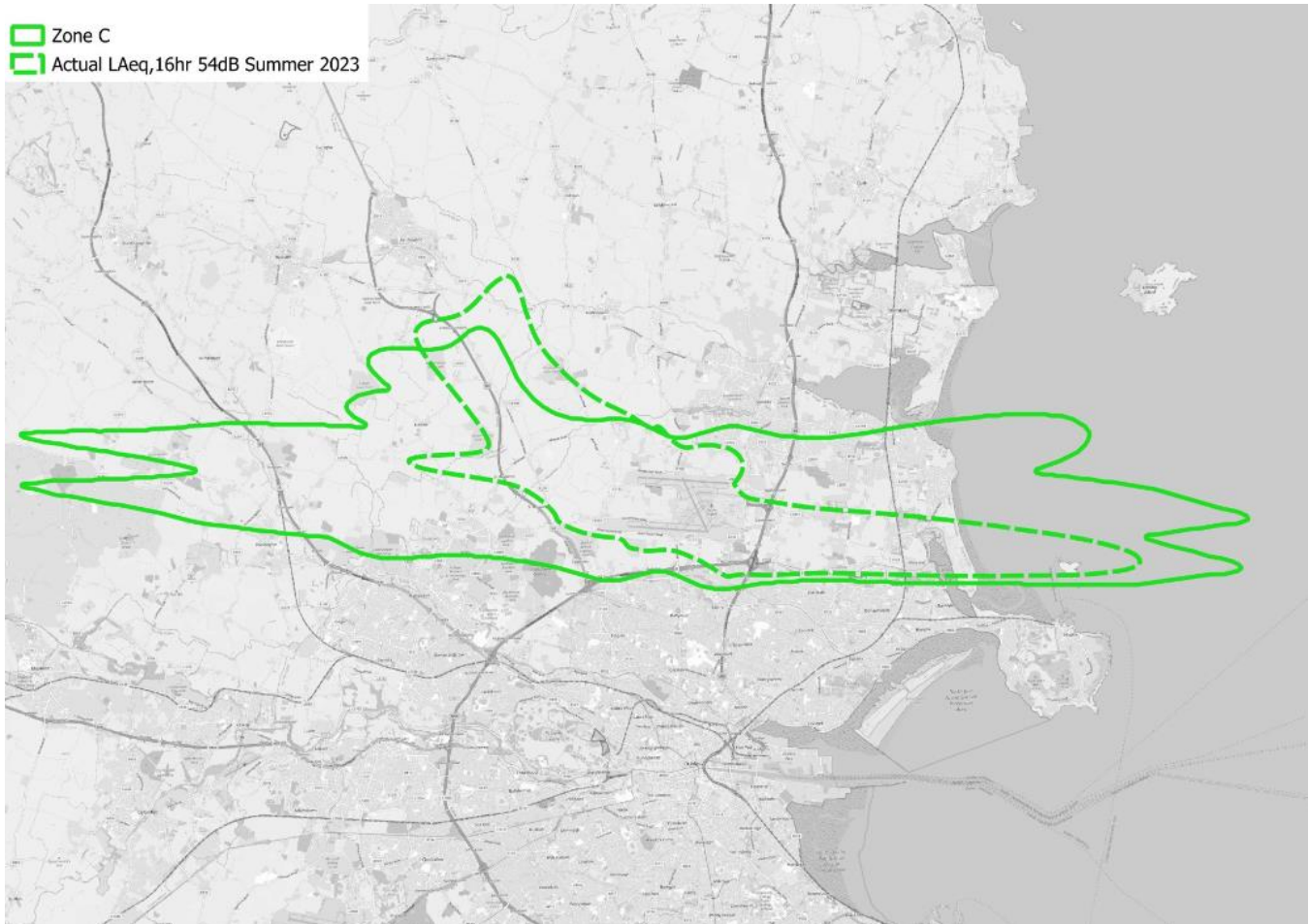
I.4 Material Contravention of Meath and Fingal Development Plans in 2023

It is Important that the Board are aware that Dublin Airport operations were also in material contravention of both the Meath and Fingal Development Plans in 2023.

The image below is a comparison of the 2023 63dB LAeq16 Summer contour with Noise Zone A. The 2023 63dB LAeq16 noise data and contours were submitted by the daa as part of their Infrastructure Application (F23A/0781). It is clearly evident that the operations in 2023 violated Noise Zone A. Again, it is worth highlighting that the Noise Zones are based on 100% Single Mode operations for both departures and arrivals from all four runways (10L, 10R, 28L and 28R). This was done to capture the worst-case noise scenario on any given day.



The image below is a comparison of the 2023 54dB LAeq16 Summer contour with Noise Zone C. It is clear that the 2023 operations are in material contravention of both the Meath and Fingal Development Plans.



1.5 Rivermeade and Coolquay Local Area Plans

Over 30 years ago Fingal County Council identified Rivermeade and Coolquay as the two most suitable locations for Rural Villages to house locals from St. Margarets The Ward area which were deemed to be away from Dublin Airport, and which would therefore be compatible with the expansion of Dublin Airport whilst at the same time ensuring that the St Margarets The Ward Communities could co-exist and continue their long tradition in the area.

These were passed in successive Development Plans with all stakeholders including the daa.

The Planning submission for the North Runway that obtained permission in 2007 did NOT indicate that the operations at Dublin Airport interfered in ANY way with the development of these two locations at Coolquay and Rivermeade.

BUT now the entirety of Coolquay is now to be located within the eligibility contour as proposed without the Local Area Plan being completed and some of the Eligibility contour includes areas of Rivermeade.

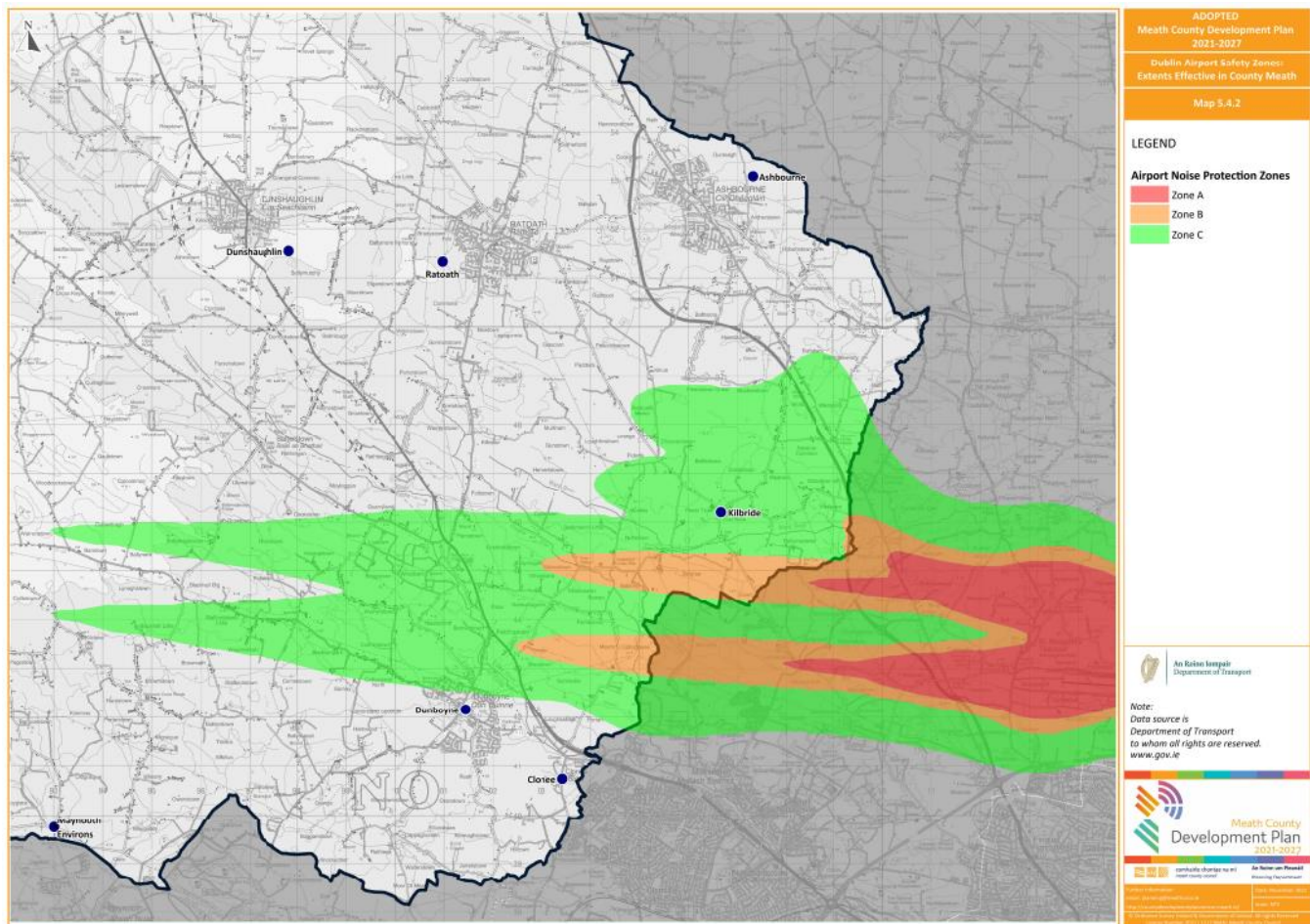
The issue with this is that the 50dB plus 9db criteria is an increase in tenfold of noise proposed at these locations and because housing has not yet been completed then this is a once off mitigation for existing houses. However, the noise at these areas is being increased by 10-fold. 9dB is on the logarithmic noise scale which is not linear and therefore an increase of 9dB is ten times noisier.

Where was all of this information going back 30 years? ABP need to see this for what it is and is a blatant misuse of the planning system to remove the Communities of St Margarets The Ward for financial gain by the daa, all airlines and the airline industry at the expense of the communities.

We refer back to our previous submission and refer to the proposal that Thornton Hall which is a serviced site outside these noise contours which can be used to relocate the Community of St Margarets The Ward as part of realistic mitigation measures.

1.6 Meath County Council Development Plan

Map 5.4.2 below is an extract from the Meath County Council Development Plan which must now be altered to indicate the new Eligibility Contours on it and the noise implications of this contour being 10 times an increase in noise which will have a serious adverse impact on the health of people living here.



2.0 Letter from Tom Phillips and Associates

2.1 Introduction

This submission is in response to the letter received dated March 12th 2024 in relation to case number ABP-314485-22 (F20A/0668). We want to thank the Board for affording us the opportunity to make a submission in relation to the submission received from Tom Phillips and Associates on behalf of DAA plc, dated March 4th 2024.

We first would like to make the point that the information received by the Board is of significant nature and the Board should have deemed it significant and requested feedback from the public. These maps show that there is a large cohort of people who are now deemed to be in nighttime noise contours that warrants insulation. Many of these people are totally unaware of this and are relying on community groups to inform them. This should have been the role of the applicant, Fingal County Council, ANCA or the Board. These same people have no opportunity to make a submission on these maps. They were never made aware at any stage in the planning process for application F20A/0668 that they would be subjected to such a high level of nighttime noise that they now qualify for insulation. For this reason alone, this application should be rejected by the Board.

There is also a cohort of people who were informed by ANCA that they would qualify for nighttime insulation under their Regulatory Decision. Based on these new maps received by the Board, they no longer qualify for nighttime insulation. Again, these people have not been made aware of this by the Board and have not been afforded the opportunity to make a submission. Again, their voices are not heard which is contrary to proper planning and sustainability. In my opinion this lack of opportunity afforded to them by the Board leaves the Board open to legal challenge.

In this submission we provide evidence why we believe that the maps provided, do not fully assess the significant nature of the increase in noise for the dwellings newly exposed to noise since the North Runway started operation. We contend that the comparison for significant effects should be a lot lower than +9dB and that the baseline should be a year before the North Runway opened compared to 2025 with the Relevant Action. We also show that Dublin Airport failed the Noise Abatement Object (NAO) in 2022 and did so again in 2023, with respect to nighttime noise. We also make reference to the Infrastructure Application (IA) submitted by the daa on December 15th 2023 (F23A/0781) as it was submitted only 3 months after the RFI for the Relevant Action in September 2023 and there are many comparisons to be made regarding the 55dB Lnight contours in this latest RFI.

2.2 daa submission

The request from the Board dated February 13th 2024, states that:

*“The Board received additional information from the Dublin Airport Authority (Daa) on the 14th of September 2023. This additional information includes noise contour maps which **amend** the terms of the Third Condition of the Regulatory Decision in relation to Figure 3.1 – Residential Sound Insulation Grant Scheme (RSIGS) and the “Initial Eligibility Contour Areas”.”*

We have highlighted ‘**amend**’ because under section 10. (5) of the Aircraft Noise (Dublin Airport) Regulation Act 2019, the Board must now carry out a Regulatory Process in its role as the Competent Authority for Noise. The new maps provided by the daa were clearly not the subject of a previous consultation conducted by the Competent Authority pursuant to section 9 of the Act.

The request from the Board further states:

“Maps at a relevant scale, which will allow the Board to undertake an assessment of any comparison with Eligibility Contour Area maps in Fig 3.1 and Maps 1-23 of the Regulatory Decision, and the noise contours now proposed.

Maps shall be provided at a scale of 1:50,000 for Fig 3.1, and 1:10,000 for Maps 1-23, or a scale otherwise agreed with the Board. The revised maps shall clearly illustrate all authorised habitable dwellings within the 55 dB Lnight and 63 Lden contour for the year 2025.”

The intention of the request is to clearly illustrate all dwellings that now form part of the 55 dB Lnight contour and the initial eligibility contour area based on the new EIAR material submitted in September 2023. In the letter submitted by Tom Phillips and Associates, PR-19-2816 RA Draft RFI Response 13.09.2023 v1.7.pdf, on page 4 it states that:

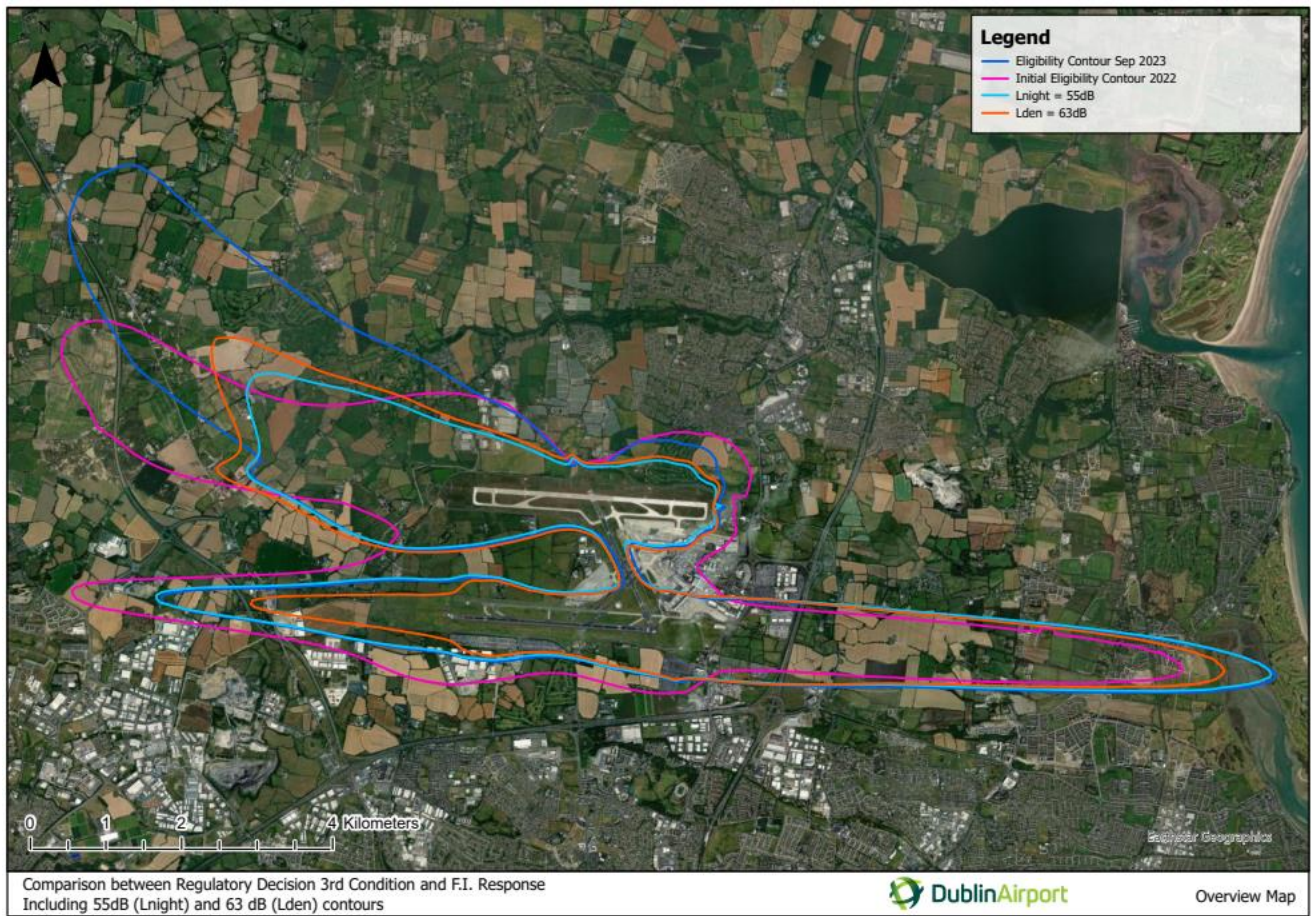
“During the intervening period, the North Runway has become operational (since August 2022), and we are therefore in a position to update modelling assumptions into the future based on the actual routes flown.

The previous assessments (18th December 2020 & RFI Submission 13th December 2021) were based on route assumptions developed in consultation with the IAA in advance of the North Runway’s completion. The updated assessment is based on analysis of radar data of actual routes flown since the most recent change to the published procedures (23rd February 2023). This information is now provided in the attached EIAR Supplement (September 2023).”

This response makes it clear that the flight paths have changed and the noise data in the EIAR needed to be updated. This was the third EIAR for the Relevant Action application. In previous submissions by resident groups and individuals, evidence was provided that Condition 1 of the North Runway's planning permission in 2007 has not been complied with. The environmental assessment for the 2007 planning permission was based on straight out flight paths. The current operations are unauthorised development.

The request from the Board was that "*The revised maps shall clearly illustrate all authorised dwellings*". However, the daa have failed to identify all authorised dwellings. It is up to the Board to try and identify the dwellings. The daa should have marked each dwelling on the maps. It is therefore difficult for the Board to assess the number of dwellings newly contained within the 55 dB Lnight contour and initial eligibility contour. On a rough examination of the maps there are over 200 dwellings newly identified as being in the 55 dB Lnight contour. It is also worth noting that there are over 40 dwellings that were originally in the 2022 eligibility contour but who are now excluded from the contours. In total, there are approximately 240 dwellings that have been affected by these new maps and it's imperative that they be allowed comment on the maps. Thus far they have been excluded by the Board, and the Board should reflect on this exclusion.

The significant change in the eligibility maps is very visible when comparing the 2023 eligibility contour (blue) with the 2022 eligibility contour (pink):



There is a large cohort of houses to the Northwest newly contained:



And a large cohort of houses to the East of the South Runway:



2.3 Reference to ICAO and 15 degrees divergence

On page 3 of their letter, Tom Phillips and Associates state:

“Due to airspace safety requirements set down by the International Civil Aviation Authority (ICAO) and enforced by the Irish Aviation Authority (IAA), departures off the North runway must turn slightly (at least 15 degrees) to the north once airborne and clear of the runway end”.

This statement is factually incorrect. Departures off the North Runway do not have to diverge by at least 15 degrees to the North once airborne.

In the Inspector’s Report for the 2007 Grant of Planning for the North Runway (<https://archive.pleanala.ie/api/documents/Report/217/R217429.pdf>), it states on page 23 that the Irish Aviation Authority (IAA) in a letter dated 24/01/04 ((sic- possibly dated incorrectly) states that the Authority has been consulted by the applicants on the development during the design stages and the proposal conforms with its requirements.

A meeting was held on February 21st with representatives of The St Margarets The Ward Residents group and the IAA Chief Executive, Mr Declan Fitzpatrick, at the IAA’s offices. Mr Fitzpatrick stated that the only way that the IAA could have given a letter of support to the North Runway’s planning application was if runway operations were in accordance with ‘*Dependent mode*’. Dependent Mode does not require divergence, contradicting the statement above in the letter from Tom Phillips and Associates.

The ICAO ‘Manual on Simultaneous Operations on Parallel or Near-Parallel Instrument Runways’ was published in 2004, before the planning application for the North Runway was submitted. This document required a minimum of 30 degrees divergence for segregated mode operations and 15 degrees divergence for mixed mode operations. Because the North Runway planning application was based on straight out routes, Mr Fitzpatrick stated that the IAA must have assumed that ‘*Dependent Mode*’ operations would be in use.

Dependent Mode operations is where both runways are effectively treated as a single runway from an operational point of view. If an arrival aircraft is coming in to land, no take-offs are allowed on the other runway. This allows straight out operations on both runways and complies with planning permission of 2007.

It is worth noting that the current application at Gatwick Airport for a new runway is based on Dependent Mode operations. Gatwick Airport also state that the two runways operating in Dependent Mode can facilitate up to 75m passengers by the end of the 2030’s:

<https://www.gatwickairport.com/company/future-plans/northern-runway.html#:~:text=Our%20planning%20application%20proposes%20repositioning,the%20end%20of%20the%20decade>.

Therefore, the comments in the letter by Tom Phillips and Associates are incorrect and Dependent Mode operations allow for compliance with the North Runway's planning permission and can facilitate future growth at Dublin Airport. The Board should insist that Dublin Airport adheres to the planning conditions issued by the Board and Dependent Mode should form part of any decision laid down by the Board.

2.4 Reference to Mixed Mode and Noise Zones

On page 3 of their letter, Tom Phillips and Associates refer to the change in assumption regarding mixed mode operations. The daa have flip-flopped on mixed mode operations throughout this planning process. It is obvious that the daa are excluding mixed mode operations now with the sole intention of minimising the predicted noise footprint of future operations at Dublin Airport. How can the public trust what operations the daa will perform in the future? The Board must decide whether Option 7b allows for Mixed Mode operations or not. If the daa want to exclude Mixed Mode operations, then it should form part of a clear condition of planning to exclude its use.

2.5 Non-Compliance with the Development Plan Noise Zones

On page 4 of their letter, Tom Phillips and Associates refer to land-use zoning measures employed through the use of Noise Zones A – D within the Fingal County Development Plan. What the letter fails to state is that the flight paths currently in operation at Dublin Airport are in non-compliance with the Noise Zones in the Development Plan. The non-compliance is shown by the daa in their Infrastructure Application (F23A/0781) in EIAR Appendix 9-1, section 9-1.8: <https://planningapi.agileapplications.ie/api/application/document/FG/899917>

Section 9-1.8 is titled ‘Comparison with Dublin Airport Noise Zones’. Figure 9-1-001 shows that the 2027 63 dB LAeq16h contour for ‘No Proposed Development (PD)’ and ‘No North Runway Relevant Action (NRRRA)’ lies outside Zone A of the Development Plan. The 2027 No PD No NRRRA scenario is equivalent to the 2025 Permitted scenario in the Relevant Action as it has the 32m passenger cap in place and no Relevant Action. Even without the Relevant Action the current flight operations do not comply with Noise Zone A:

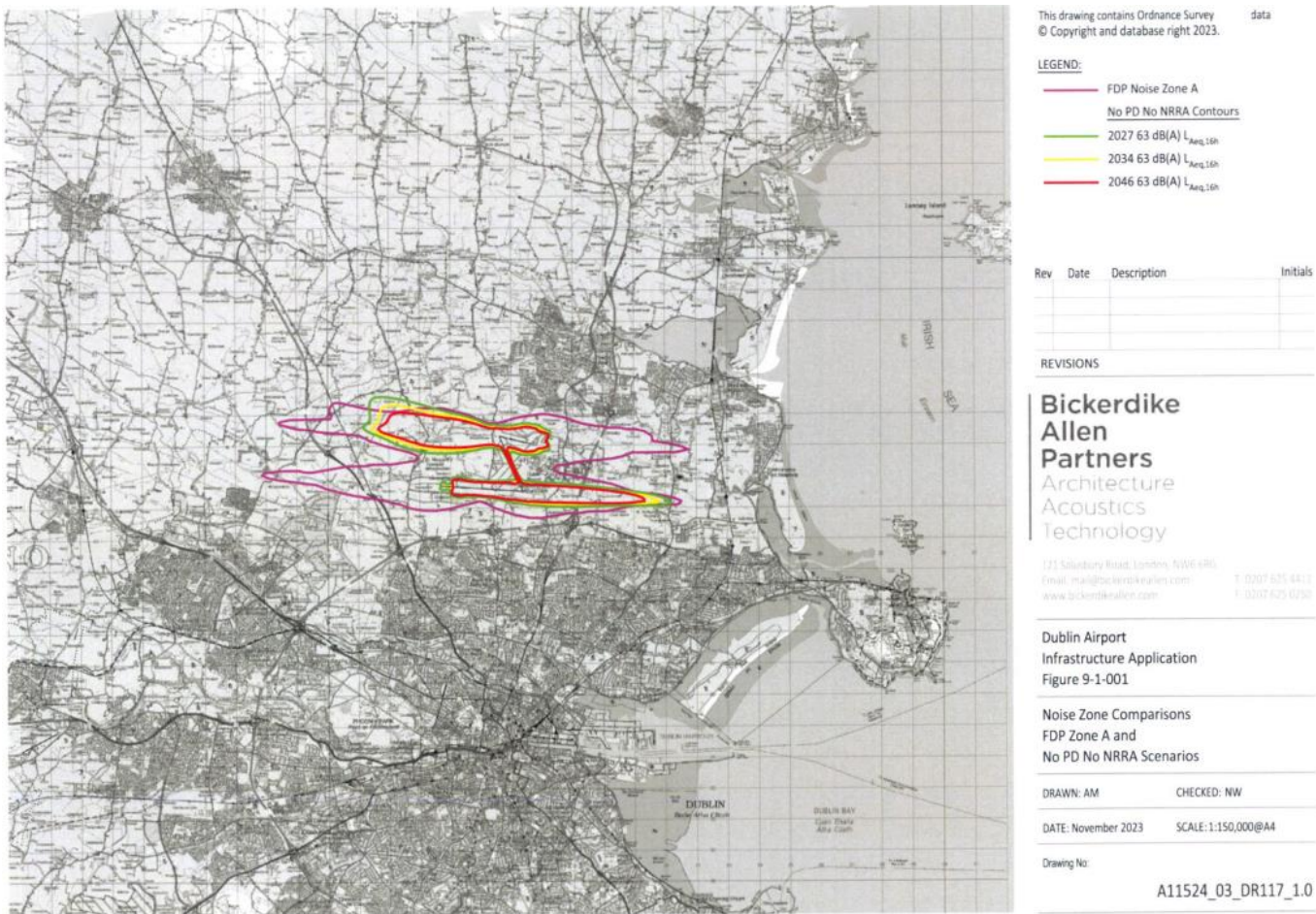
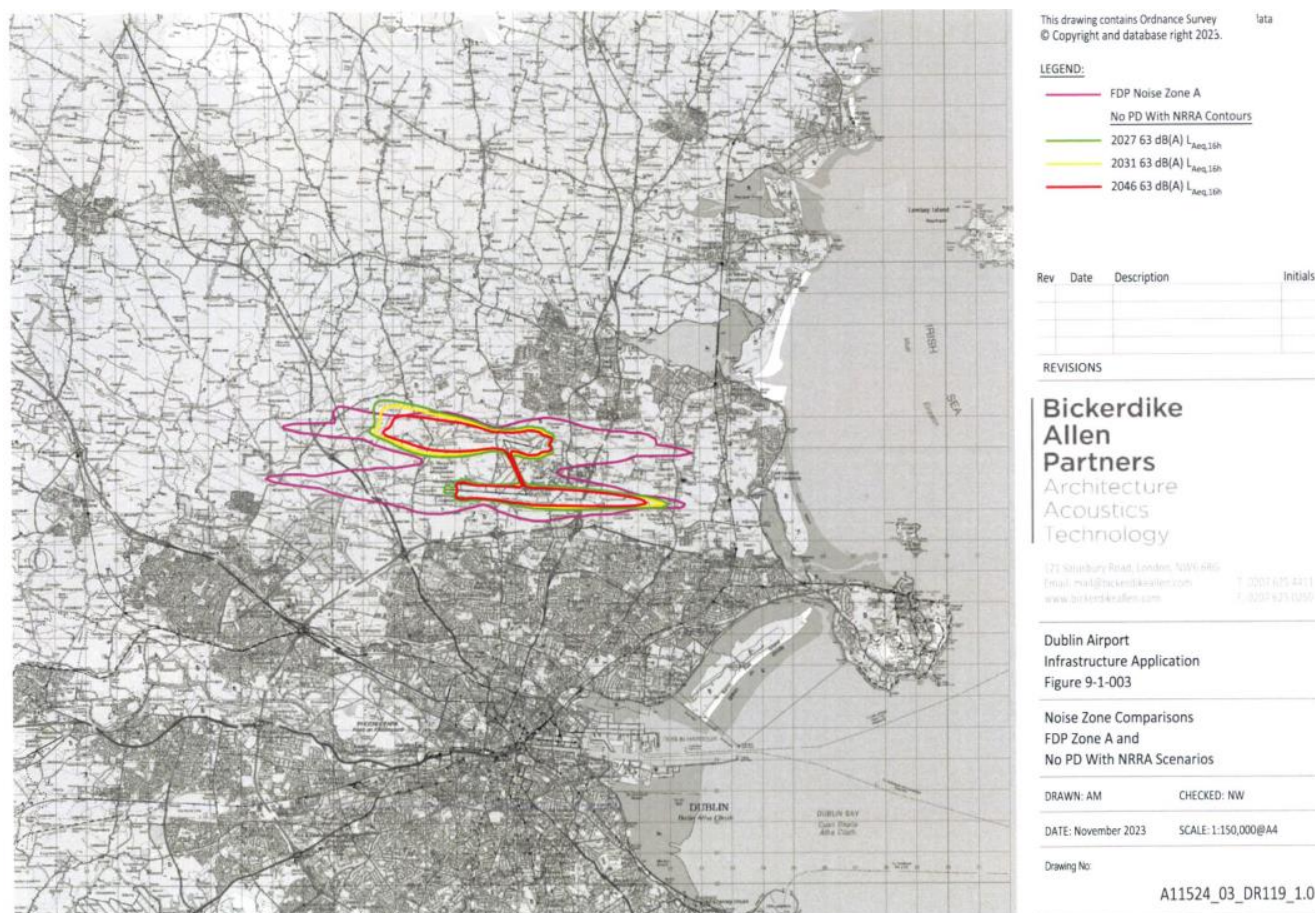


Figure 9-1-003 shows that the 2027 63 dB LAeq16 contour for 'No Proposed Development (PD)' and 'With North Runway Relevant Action (NRRA)' lies outside Zone A of the Development Plan. The 2027 No PD With NRRA scenario is equivalent to the 2025 Proposed scenario in the Relevant Action as it has the 32m passenger cap in place and Relevant Action in place. This map shows that the current flight operations do not comply with Noise Zone A. The same is true for Zone B and Zone C.



However, it is worth pointing out that the contours in the figures in Appendix 9-1, section 9-1.8 are not modelled on the same basis as the Development Plan Noise Zones. The Development Plan Noise Zones are single mode, based on 100% modal usage of each runway in each direction. The Noise Zones attempt to capture the worst-case scenario on any given day. They are a summation of 100% departures on each runway (10L, 10R, 28L and 28R) and 100%

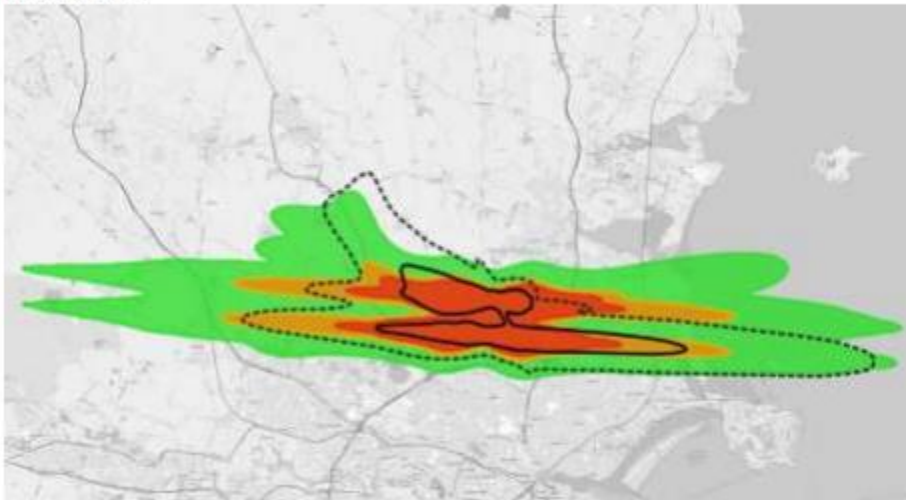
arrivals on each runway (10L, 10R, 28L and 28R). The Noise Zones do not assume a 70/30% modal split of the runways or take Option 7b into account.

However, the modelled contours in Appendix 9-1 do take modal split into account and flight schedules based on Option 7b. Therefore, if the contours were modelled in the same way as the Noise Zones, these contours would significantly breach the Noise Zones.

Non-compliance with the Development Plan was also raised by Suono in their submission on the EIAR Supplement from September 2023. Please see below the comparison of the new EIAR L_{night} contours against the Noise Zones in the Development Plan.

L_{night} contours against Noise Zones (current)

Black dotted line showing 48 dB contour; black solid line showing 55 dB; green, orange and red areas are Noise Zones



The non-compliance with the Development Plan was also commented on by Town Planner Hendrik W van der Kemp in his submission on the EIAR Supplement from September. He stated that:

“the noise contours resulting from the Relevant Action application are no longer consistent with the noise zones as defined on the recently adopted Development Plan Map.”

The non-compliance of the current flight operations with the Development Plan is sufficient evidence for the Board to reject the Relevant Action and enforce Dependent Mode operations

to ensure compliance with the planning permission of 2007 and the Development Plan Noise Zones.

Fingal County Council will need to make another variation of the Development Plan to update the Noise Zones. What is concerning, is that the Councillors may not approve such a variation.

This breach of the Noise Zones is inconsistent with National Policy Objective 65 in the National Planning Framework 2040. NPO 65 states to:

“Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.”

Based on this material change to the Development Plan, this planning application which is just a Relevant Action to amend two conditions of the North Runway’s planning permission is not the appropriate planning vehicle for such a significant impact on the Development Plan. The Relevant Action should be refused and the daa made to submit a full planning application.

2.6 Initial Eligibility Contour

On page 5 of their letter, Tom Phillips and Associates refer to the initial eligibility contour. They provide a footnote that states:

“We note daa’s proposal was for 55 Lnight and also the very significantly affected. ANCA’s draft decision only included the 55 Lnight but added the ‘very significant’ effects after consultation”.

This footnote is incorrect. ANCA did include the population ‘very significantly’ affected in their Draft decision but used the year 2025. After consultation they changed to include the year 2022 also.

ANCA’s decision to include 2022 is in itself very significant as they defined it as the worst year for the North Runway. Further on in this submission we put forward the argument that the daa should have also included 2022 when determining those ‘very significantly’ affected. The daa state that 2022 “*is no longer relevant as the Application had not been determined at that time*”. However, we disagree with this statement. 2022 is very relevant. It was the most recent noise situation before the North Runway opened. It should be the baseline to compare future significance against. The opening of the North Runway has had impacts on the noise situation at night around Dublin Airport even though the North Runway was not at use during the night period. The opening of the North Runway combined with the South Runway facilitated a greater number of aircraft movements at nighttime on the South Runway. This can be seen by comparing the Lnight contours from 2022 to 2023. As an example, dwellings located around the Ward Cross were in the 40-44 dB Lnight contour in 2022 but in 2023 the properties endured a higher level of nighttime noise and find themselves in the 45-49 dB Lnight contour. So just opening the North Runway and allowing a larger number of aircraft movements led to more nighttime flights and an increase in the noise environment. Therefore, it makes more sense that the baseline for the ‘very significant’ threshold should be the scenario just before the North Runway opened. Using the daa’s logic, they want to compare ‘2025 Permitted’ to ‘2025 Proposed’. This does not fully quantify the effects of having the North Runway in operation.

The same argument of the increase in nighttime noise on the South Runway due to the opening of the North Runway was made by the Board’s Inspector for the 2007 planning permission. By just having the North Runway opened during daytime hours facilitated a higher number of nighttime flights on the South Runway. In the Inspector’s report, <https://archive.pleanala.ie/api/documents/Report/217/R217429.pdf>, on page 82 it states:

“In terms of significant effects in terms of night time noise Mr. Sharps stated at the oral hearing that because the new runway would not be used at night (save for restricted exceptions) there would be no significant effect from the development at night. In isolation and subject to a prohibition of the use of the proposed runway between 2300 and 0700 (save in stated exceptional circumstances) the proposal would, itself, have no noise effect at night. He stated further that there are no guidelines to allow for determining significant effects in terms of night.

*However notwithstanding Mr. Sharp’s opinion as expressed at the oral hearing **it is quite apparent from the noise contours that in the 2025 ‘with development’ case and the 2025 ‘without development case’ there is a forecast increase in noise at night even though the proposed runway would not be used at night.** As such the cumulative impact of the proposal with use of the existing runways within the aerodrome is of particular relevance. The applicant was asked to address this matter in the section 132 notice issued by the Board following the oral hearing, in addition to quantifying the potential for increase in night flights on the existing runway which could derive from the growth of air traffic at the airport arising from the proposed runway and clarifying the statement made in paragraph 16.1.2.35 of the EIS which states that a system of assessing the increase in noise level would be used to assess night time noise impact. The notice also requested which category in the accompanying table to which significance should be attached. **While the response did make clear that the number of night movements in the modelling period would increase from 45 to 65 in the constrained case (no runway) and from 49 to 95 in the unconstrained case (with runway) the applicant failed to identify the category to which significance should be attached.** The applicant stated in response “that it is respectfully submitted that to provide an absolute figure attributable to ‘significance’ is not equally applicable in all circumstances having particular reference to the background noise”. However no data has been provided on such background noise. I would therefore concur with Mr. Thornely-Taylor’s opinion that the request has not been substantively or satisfactorily addressed and that, therefore, there is no clear information about the significance of noise at night available to the Board. This is further exacerbated by the fact that the applicant omitted to submit drawing no. ABP-RFI Q2d which would, most likely, have been the night-time 2025 Option 7b contour with 2 nd runway, corresponding to Figure 58, Part 4 of the EIS.”*

Therefore, the use by the daa of the 2025 scenarios only, fails to adequately include all significance of the effects of the North Runway.

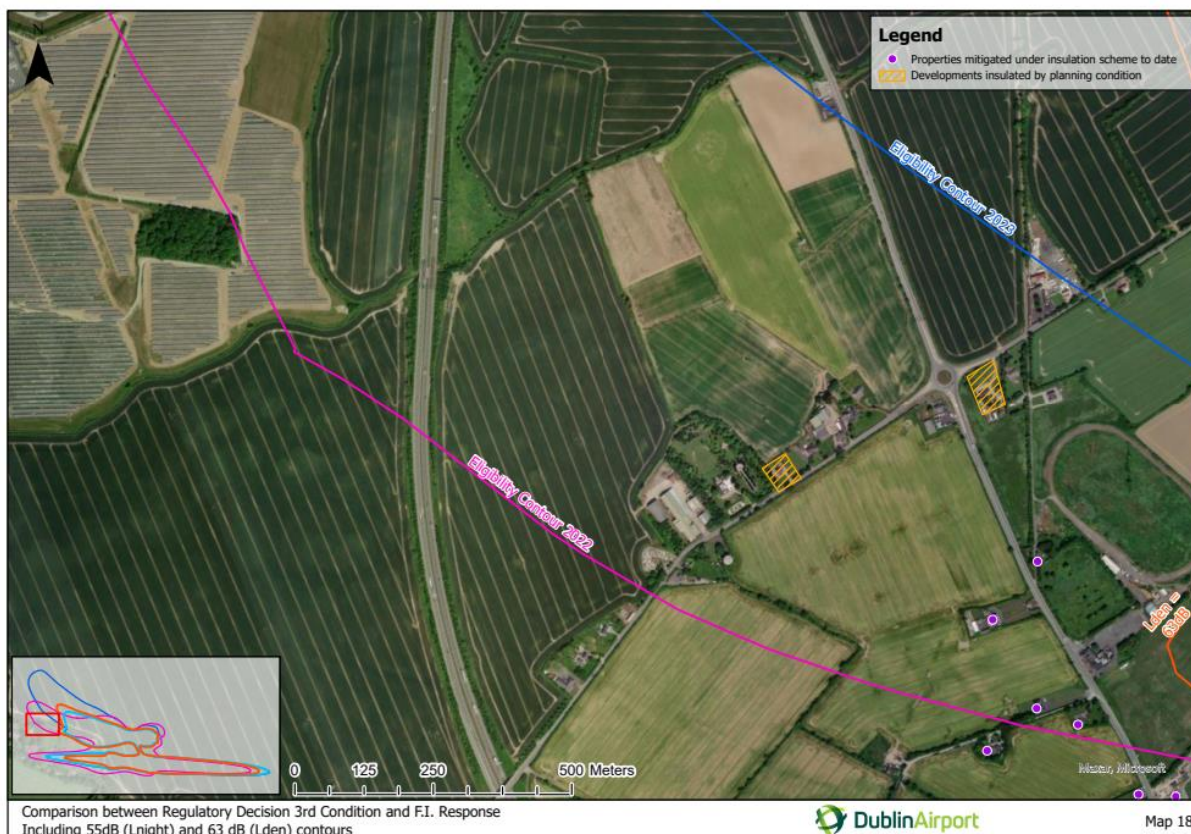
In summary, the daa's maps are not a true reflection of the maps and the situation recommended by ANCA. The Board should request that the daa include the use of the year 2022 in the '*very significant*' comparison.

2.7 Dwellings Subject to an Insulation Condition

On page 4 of their letter, Tom Phillips and Associates state that they included maps showing dwellings subject to an insulation condition. These maps were not requested by the Board, and one must ask why the daa included them. It is worth noting that ANCA do not exclude dwellings already insulated, in line with guidance from the Environmental Noise Directive (END), when gathering metrics for the population exposed to greater than 55dB Lnight. Therefore, these dwellings cannot be excluded when determining compliance with the NAO and reporting noise statistics under the END.

A significant portion of the dwellings that the daa attempt to highlight as having received conditions of planning regarding insulation still qualify for the nighttime insulation scheme as their planning permission was submitted prior to the new planning Noise Zones coming into effect on December 9th, 2019.

We wish to draw the Board's attention to one such dwelling. Please refer to Map 18 of Pack 4 - Aerial Base (With Insulated Properties).



The dwelling highlighted as insulated is on the Blanchardstown side (West) of the Ward Cross. Planning permission was applied for in 2015 (F15B/0080) to add a single storey side and rear extension to accommodate a new living room and dining room. Planning permission was granted and condition 3 attached:

“3. Prior to the commencement of development, the developer shall submit for the written agreement of the Planning Authority full details of proposed noise mitigation measures within the proposed extension. These shall include details of noise reduction materials and shall also state what the expected noise levels within the extension will be following construction.

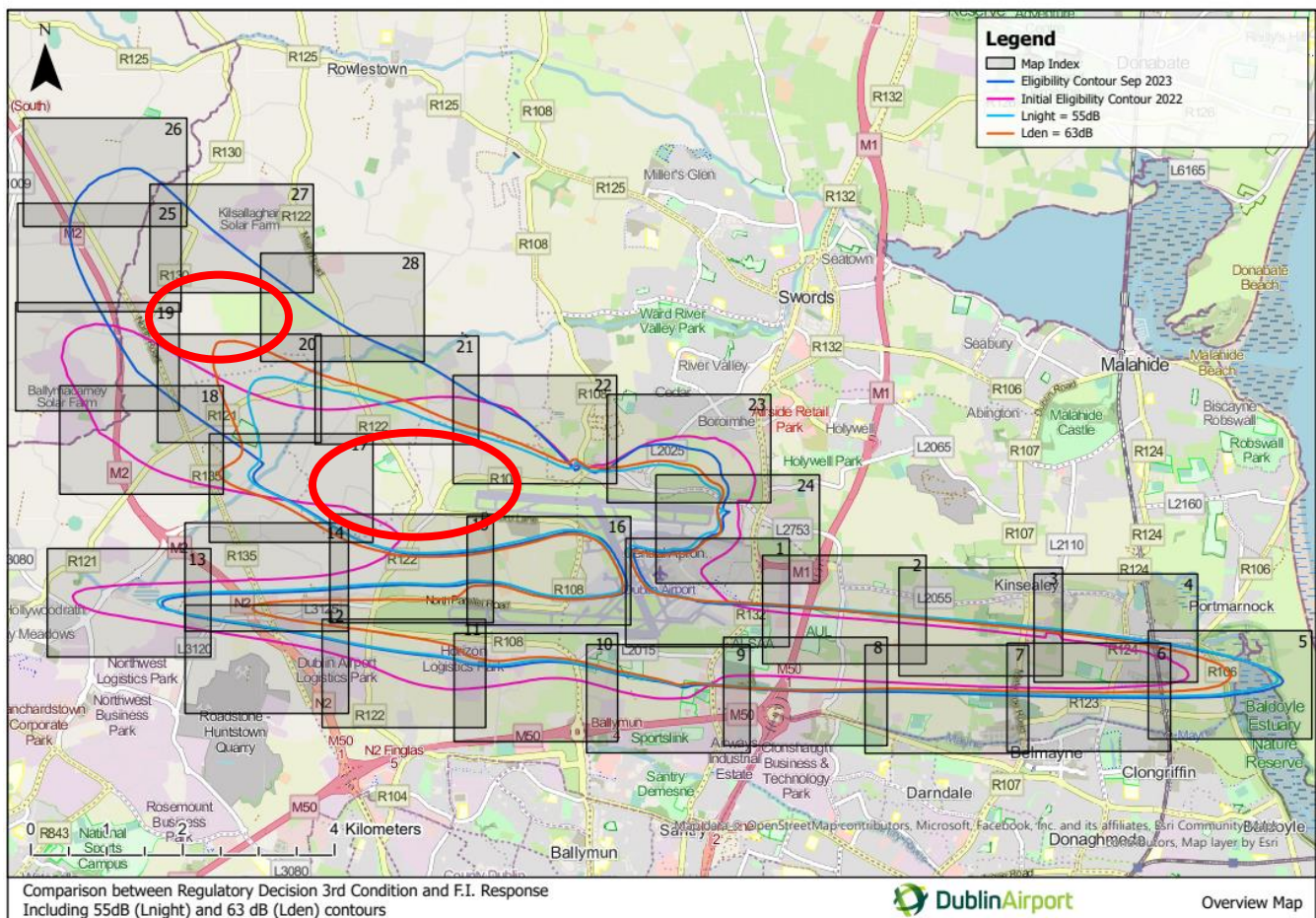
REASON: In the interest of public health”

In order to ensure compliance, a noise consultant was engaged to carry out a Noise Impact Assessment of the development. Compliance was approved by Fingal County Council. It was noted by the noise consultant that *“Given that the proposed extension is for a dining/living room space it is not considered necessary to assess the night-time noise levels in the extension.”*

This extension does not impact on ANCA’s decision to include all properties who submitted their planning applications prior to December 9th 2019. Therefore, one has to ask why the daa have included it on their map.

2.8 Missing Maps

On the overview map as part of Pack 1 – OSM Base (Without Insulated Properties), it is visually evident that the daa have failed to include detailed maps of all the areas contained within the 2023 Eligibility Contour. The oval areas highlighted in red below have no corresponding detailed map. These areas contain habitable properties, and it is virtually impossible for the Board to identify them. The maps provided are insufficient to identify all habitable dwellings. The Board should insist that the daa correct this error and supply the appropriate maps.



2.9 Authorised Habitable Dwellings

On page 6 of their letter, Tom Phillips and Associates refer to the request that all habitable authorised dwellings should be illustrated on the maps. They restrict the definition to existing dwellings and consented dwellings. However, they do not take into account zoned developments. Zoned developments are an important factor when calculating the population affected for compliance with the NAO.

Regarding consented dwellings, the daa break them up into ‘*consented with conditions requiring insulation*’ and ‘*consented and already covered by existing daa noise insulation schemes.*’ However, they fail to consider ‘*consented with no conditions and not covered by existing insulation schemes.*’

Regarding eligibility of dwellings, in their Regulatory Decision, ANCA state in section 3.1 (a) of Part 3 of their decision that qualifying properties:

“Were constructed pursuant to a planning permission granted following a planning application lodged on or prior to 09th December 2019, being the date of adoption of Variation No. 1 to the Fingal Development Plan 2017 – 2023 incorporating policies relating to development within Aircraft Noise Zones.”

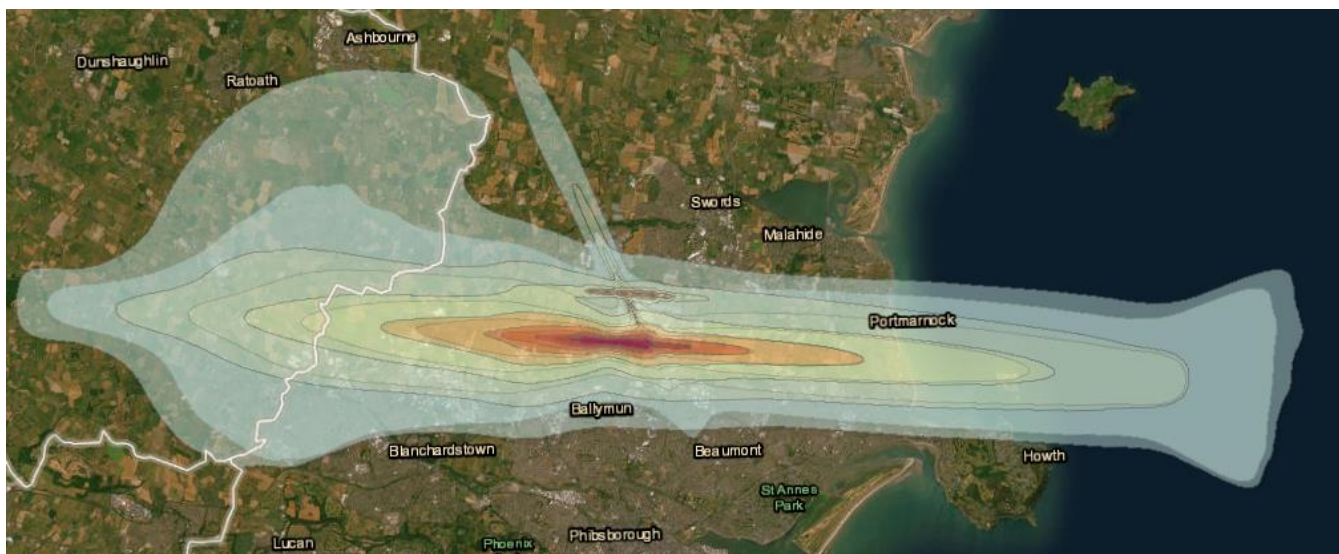
A significant amount of the properties highlighted by the daa on their new maps submitted to the Board as having a condition of planning are located around Portmarnock Train station. Planning permission for these dwellings was submitted prior to December 9th 2019, when the planning Noise Zones came into effect. Therefore, these dwellings do qualify for nighttime insulation and the daa are trying to mislead the Board as to their eligibility.

3.0 Comparison of 55dB Night contours

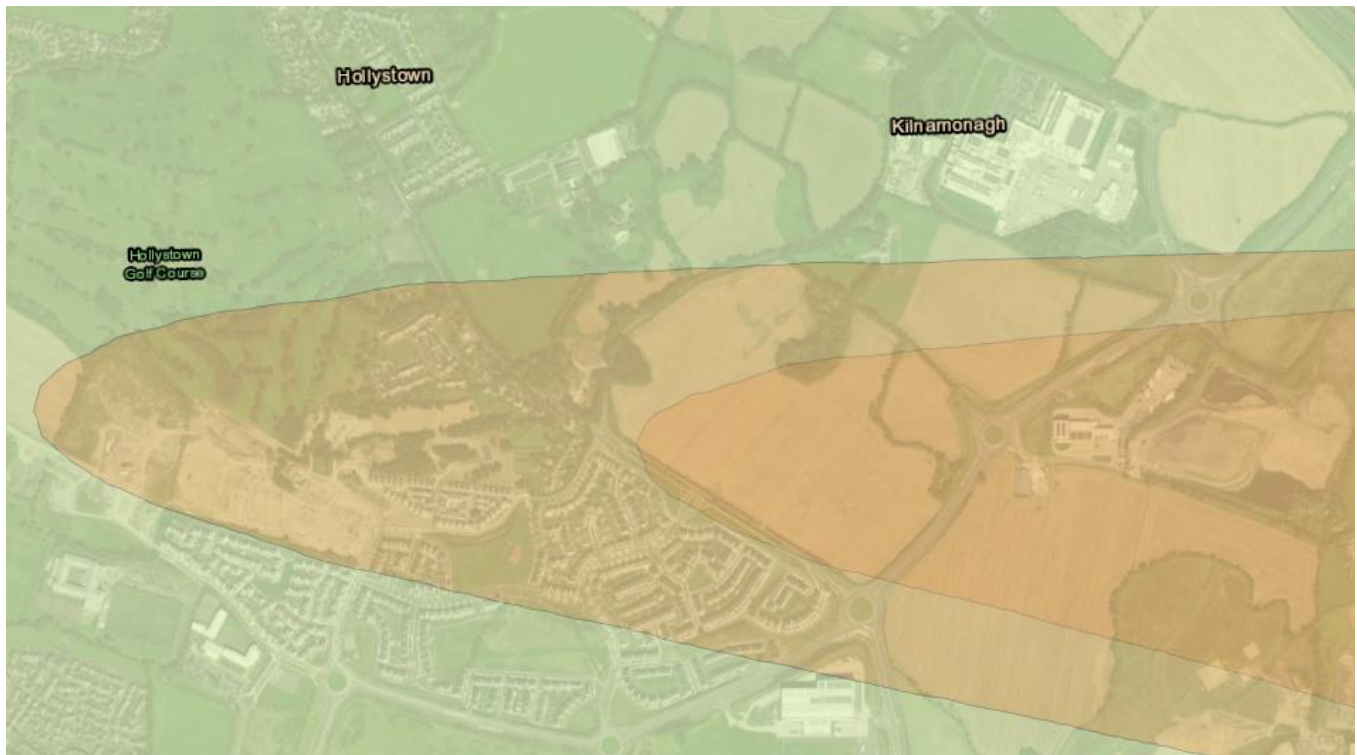
3.1 55dB Night: 2022 vs 2023

The maps presented by the daa only include maps for 2025. Now that the 2023 maps are available on ANCA's website, it is very useful to compare these maps as they contain the situation for a complete 12 months of usage of the North Runway, albeit that the SIDs changed in February 2023.

Below is a comparison of the Night contours for 2022 and 2023. It is evident that the 2023 contours are larger than the 2022 contours.



Below is a zoomed in section of the 55 dB Lnight contours on the Westerly side of the South Runway showing housing estates in Hollystown, HollywoodRath and Tyrrelstown newly contained within the 55 dB Lnight contour in 2023.



Map 18 of the daa's maps shows the eligibility contours from 2022 and 2023. From this map one can see that properties between the pink and blue lines have now moved out of the eligibility contour.



As stated above, the ANCA contours used 2022 and 2025 for the evaluation of dwellings 'very significantly' affected by up to +9dB who now find themselves in the 50dB Lnight contour for 2025. However, the new contours (blue) only use 2025 in the evaluation and therefore do not take the full extent of the influence of the North Runway on increases in nighttime noise activity across the entire Airport. The influence of the North Runway on nighttime flights on the South Runway was highlighted by the Board's Inspector during the 2007 North Runway planning permission. Therefore, this exclusion now by the daa is flawed and should be corrected.

What is also noticeable is that there are properties adjacent to the arrivals path for Westerly arrivals on the North Runway that are now excluded. Therefore, these properties are subjected to very high levels of noise circa 30% of the time when the wind is from the West. The noise

levels are similar to those captured by the Bishopswood Lane Noise monitor, NMT #3. From the July-September 2023 noise monitoring report on the daa’s website, <https://www.dublinairport.com/docs/default-source/noise-reports/noise-monitoring-report-july-september-2023.pdf>, over 75% of the movements generate noise levels greater than 70 dB LAmax.

Figure 36 shows the LAmax distribution for aircraft noise for the third quarter of 2023 for NMT 3.

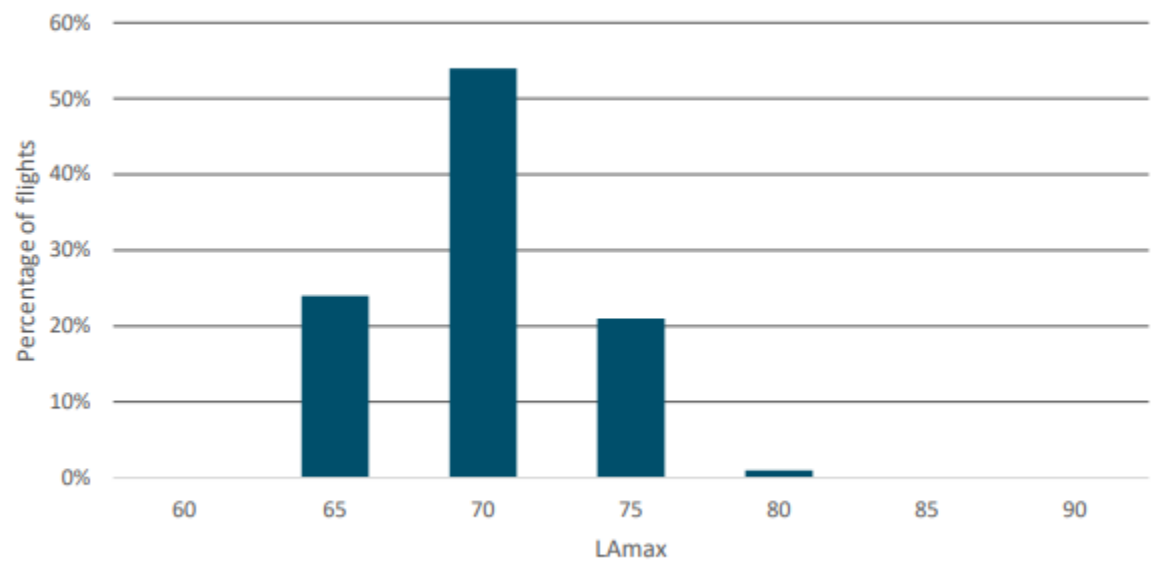


Figure 36: LAmax levels distribution for NMT 3, July – September 2023

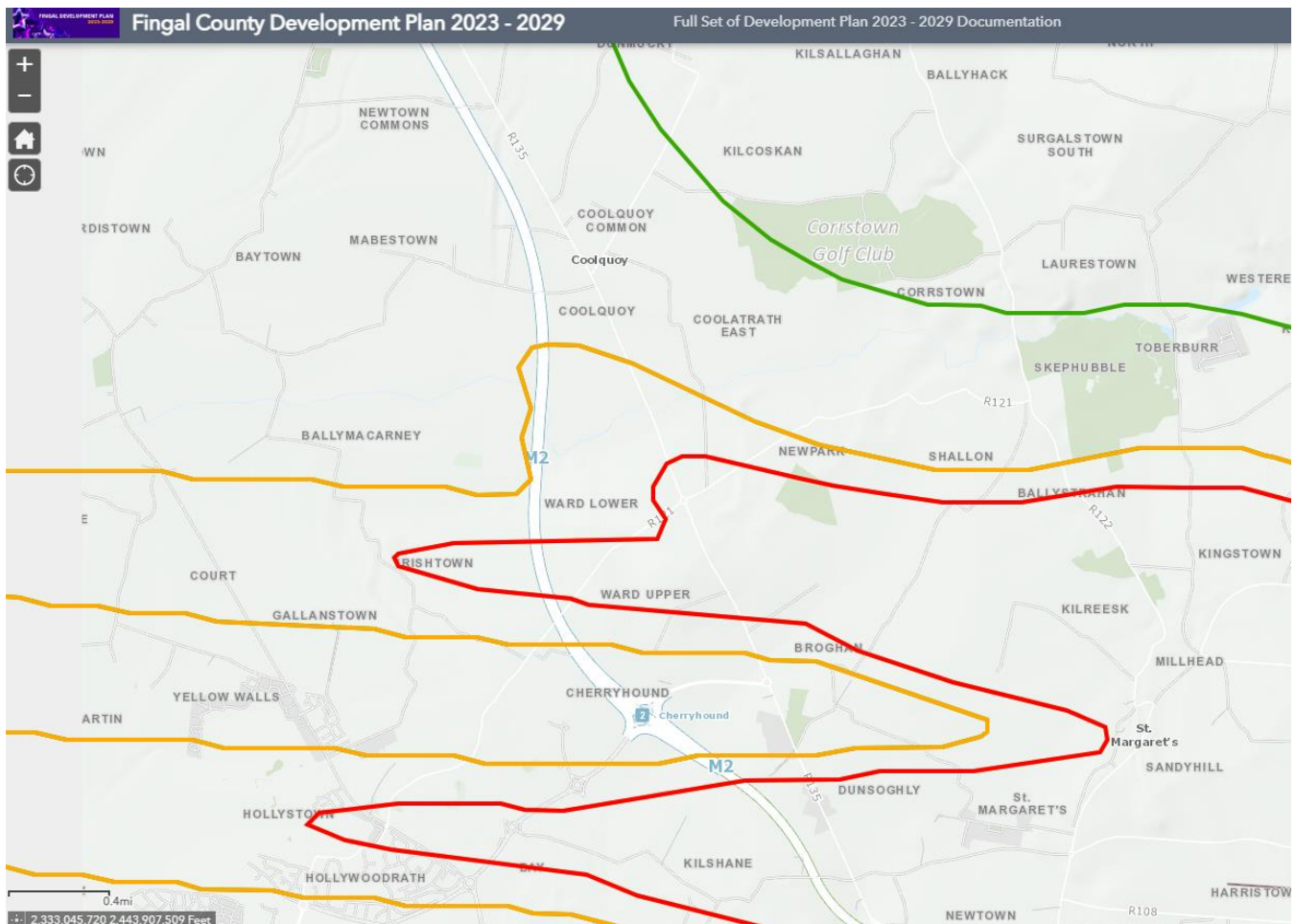
Arrivals from the West landing on the North Runway averaged a height of just 591 ft over NMT #3:

NMTs	Height (ft)			
	2022		2023	
	A	D	A	D
NMT1	657	2,196	699	2,292
NMT2	844	2,352	853	2,375
NMT3	605	2,053	591	2,011

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Many of these properties are also contained in Noise Zone A of the Fingal Development Plan. The objective of Noise Zone A is:

*“To resist new provision for residential development and other noise sensitive uses. All noise sensitive developments within this zone may potentially be exposed to high levels of aircraft noise, which **may be harmful to health or otherwise unacceptable**. The provision of new noise sensitive developments will be resisted.”*

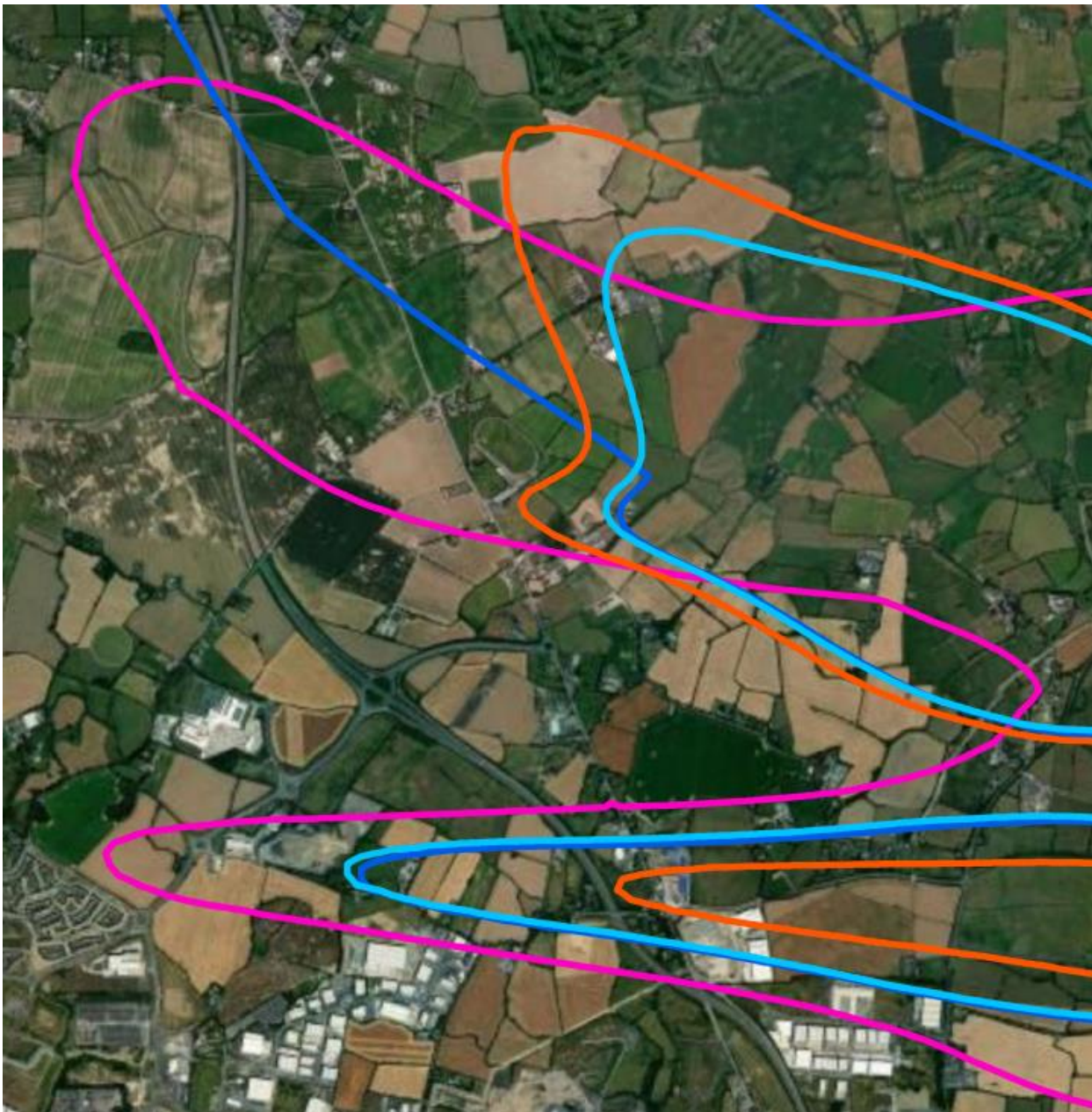


These properties are also exposed to high levels of daytime noise and are less than 0.5km from the 63 dB Lden contour in the new maps.

Therefore, it is incredulous that these properties are not insulated considering the risks of the combined exposure to high levels of nighttime noise and daytime noise.

Another worrying feature is that many of these homeowners are not aware that they may be now excluded from the insulation schemes and weren't afforded the opportunity by the Board to make a submission on these maps.

Here is a visual closeup of the areas to the west of the North and South Runways that now find themselves excluded from the nighttime insulation scheme based on the new maps provided by the daa (area between the pink and blue lines):



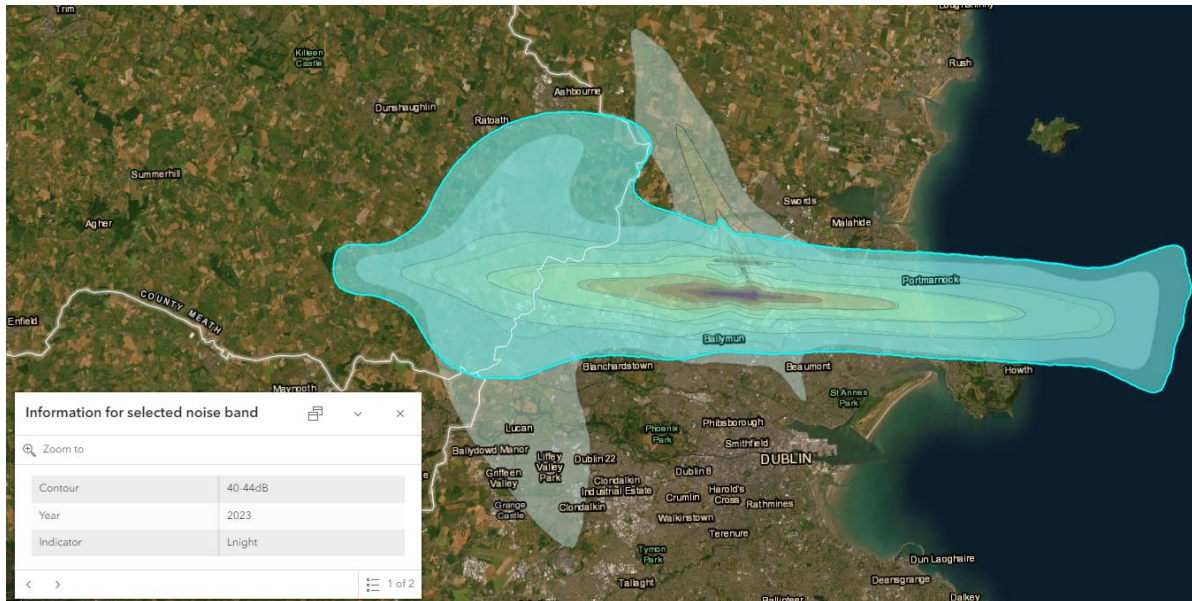
Here are properties in the Forrest Little / Boroimhe area also excluded:



The Board must ensure that the owners of these properties have not been excluded in participating in the planning process that materially impacts them.

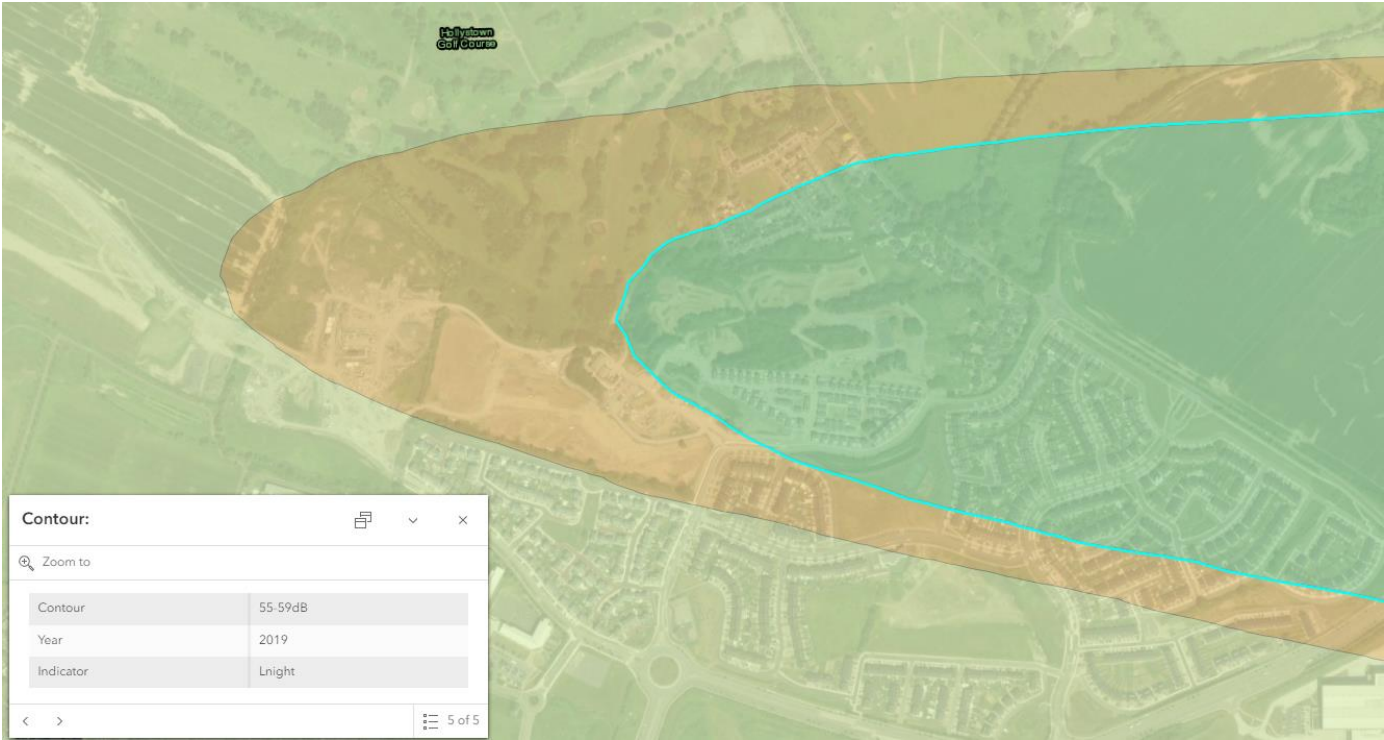
3.2 55dB L_{night}: 2019 vs 2023

Below is an image of the 2023 Lnight contours superimposed on the 2019 Lnight contours.

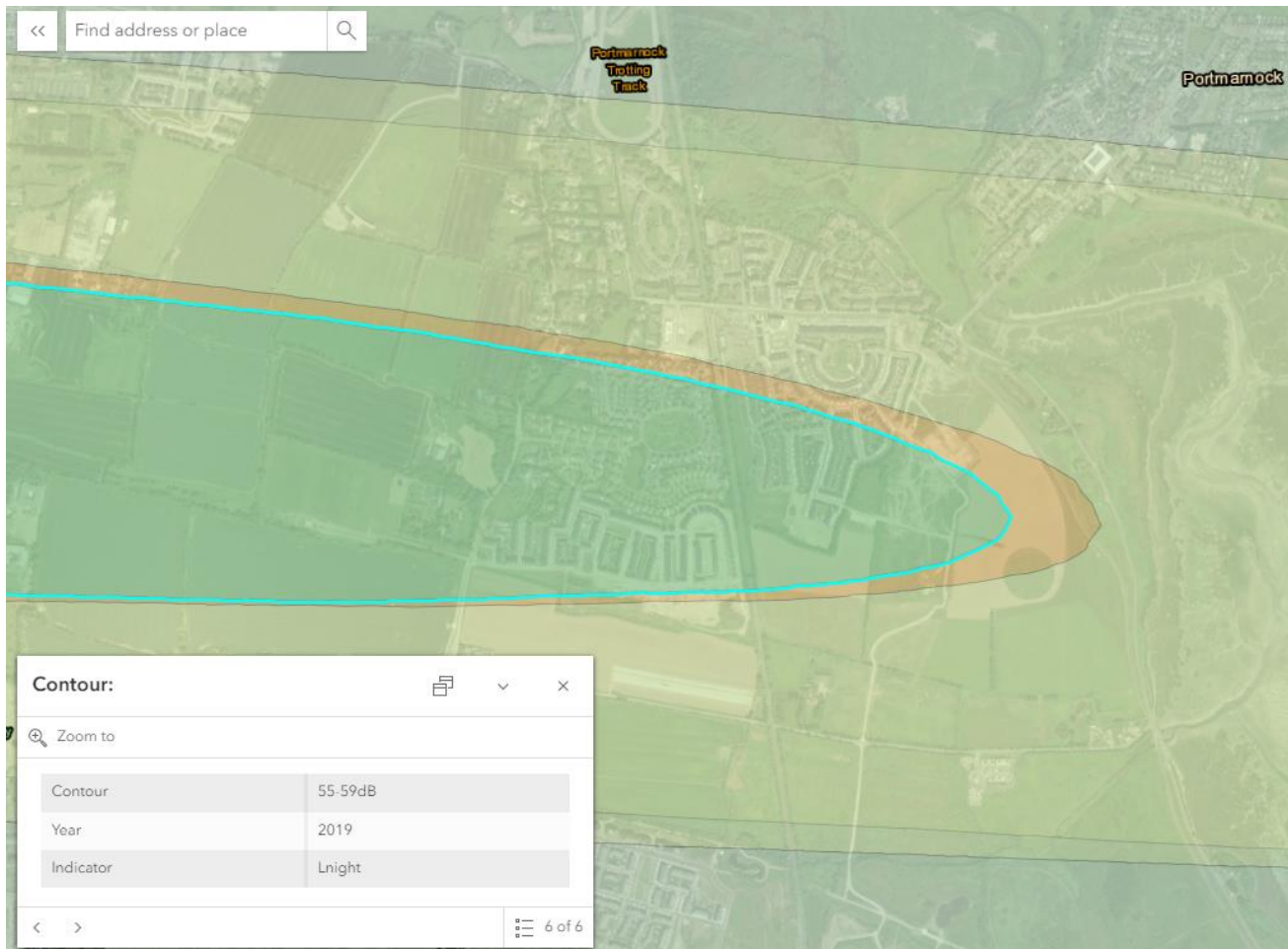


From the image one can see that in 2023 a greater area to the North-West of Dublin Airport was exposed to greater than 55 dB Lnight. The image also shows that the contours extended on both ends of the South Runway in 2023.

On the Westerly side of the South Runway, a larger area around Hollystown, HollywoodRath and Tyrrelstown were exposed to greater than 55 dB Lnight in 2023 compared to 2019.



Likewise, on the Easterly end of the South Runway, a larger number of dwellings are now enclosed in the 55 dB Lnight contour in 2023 compared to 2019.



It is for these reasons that 2023 has a far larger population exposed to greater than 55 dB Lnight than in 2019. 2019 is the baseline reference year in the NAO. It will be shown in later sections how the population exposed to greater than 55 dB Lnight in 2019, 1533, was exceeded in 2022 and exceeded significantly in 2023 and predicted to exceed significantly in future years. This highlights that nighttime aircraft noise is already adversely affecting a large cohort of the local population and that the Relevant Action will impose even more serious health impacts on those populations most impacted by aircraft operations at Dublin Airport.

The Fingal Development Plan includes Policy DAP6 to “*Protect the health of residents affected by aviation noise, particularly night-time noise*”.

Objective DAO11 includes: *“To accept that time based operational restrictions on usage of the runways are not unreasonable to minimise the adverse impact of noise on existing housing within the inner and outer noise zone.”*

Objective DAO13 includes that aircraft activity and operations should consider the requirements of the Noise Abatement Objective (NAO) for Dublin Airport. The NAO was breached in 2022 and again in 2023.

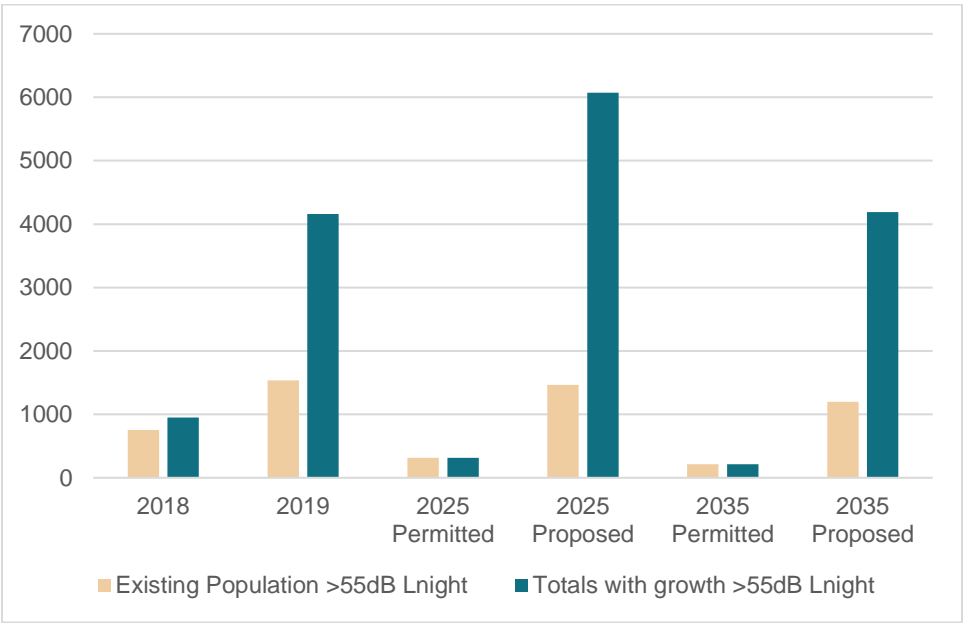
4.0 EU 598 NAO Assessment

4.1 Population > 55dB Lnight (Relevant Action)

The population highlighted in the new maps as exposed to > 55dB Lnight is critically important as ANCA has set the 2019 55dB Lnight figure as a criterion in the Noise Abatement Object for Dublin Airport.

The table below is generated from data from the Relevant Action EIAR September 2023 Supplement and is a comparison of the populations exposed to > 55dB Lnight for the existing population, permitted developments and zoned developments for a range of previous years and forecast years based on data provided in Appendix 13C of the EIAR supplement from September 2023, as part of the daa's response to the further information request from An Bord Pleanála for planning application F20A/0668. The data was extracted from tables 13C-52, 13C-64 and 13C-76.

EIAR Supplement (F20A/0668)	2018	2019	2025 Permitted	2025 Proposed	2035 Permitted	2035 Proposed
Existing Population >55dB Lnight	753	1533	315	1463	212	1197
Permitted developments >55dB Lnight	197	825	0	1011	0	591
Zoned developments >55dB Lnight	0	1800	0	3600	0	2400
Totals with growth >55dB Lnight	950	4158	315	6074	212	4188



What is noticeable from the table above is that the 2025 Proposed Scenario will fail the NAO when compared to 2019 when the total of the existing population, permitted developments and zoned developments are summed together. 2025 Proposed exceeds 2019 by 4,541 people (1533 vs 6074).

Even if all zoned developments were refused planning, the number of existing population and permitted developments would still exceed the 2019 equivalent.

4.2 Population > 55dB Lnight (Infrastructure Application)

In December 2023, the daa lodged an Infrastructure Application (F23A/0781) to Fingal County Council to increase passenger numbers from 32mppa to 40mppa.

It is very relevant to compare the Infrastructure Application to the Relevant Action Supplement as there was less than 3 months between the submissions.

The '*Proposed*' scenario in the Relevant Action is equivalent to the '*Without Proposed Development and With the NRRRA (North Runway Relevant Action)*' in the Infrastructure Application. Both these scenarios have the 32m passenger cap in place.

The '*2025 Proposed*' scenario in the Relevant Action can be equated to the '*2027 Without Development and With the NRRRA*' in the Infrastructure Application. Both scenarios are constrained by the 32m cap, and both scenarios have the Relevant Action approved. The only possible difference could be flight schedules and aircraft types going from 2025 to 2027.

Below is the >55dB Lnight comparison between the *2025 Proposed* scenario and the *2027 No PD With NRRRA* scenario. The figures for *2027 No PD With NRRRA* come from tables 9-4-80, 9-4-98 and 9-4-116 of Appendix 9-4 of the IA EIAR.

	2018	2019	2025 Proposed	2027 No PD With NRRRA
Existing Population >55dB Lnight	753	1533	1463	2763
Permitted developments >55dB Lnight	197	825	1011	0
Zoned developments >55dB Lnight	0	1800	3600	2400
Totals with growth >55dB Lnight	950	4158	6074	5163

What is clearly evident is that *2027 No PD With NRRRA* has almost double the number of existing people exposed to >55dB Lnight compared with *2025 Proposed*. And when permitted and zoned developments are included, the total is over 3x the 2019 NAO figure (5163 vs 1533).

4.3 Analysis of flight schedules and aircraft types

To try and understand how the *2027 Without PD With NRRRA* scenario has significantly more people exposed to >55dB Lnight than the *2025 Proposed* scenario, it is appropriate to consider inputs to both scenarios and the possibilities of differences. As mentioned previously both scenarios are capped at 32mppa and therefore the difference can't be related to passenger numbers. The divergent flight paths are the same in both applications. The only other possibilities are flight schedules and aircraft fleet mix.

To compare flight schedules, a comparison was made of the flight schedules from tables 13B-8 in Appendix 13B of the Relevant Action Supplement from September 2023 and table 9-2-26 from the Infrastructure Application EIAR Appendix 9-2 from December 2023.

From the table below it is evident that the daily totals of aircraft movements are identical at 656 movements. Comparing the nighttime period from 23:00 to 07:00, for the Relevant Action scenario there are 65 movements on the South Runway (28L) and 32 movements on the North Runway (28R), compared to the Infrastructure Application scenario with 60 movements on the South Runway and 29 on the North Runway. In total there are 97 movements with the Relevant Action compared to 89 with the Infrastructure Application.

The Relevant Action, therefore, has 8 extra aircraft movements during the nighttime period, with 5 extra on the South Runway and 3 extra movements on the North Runway

Tables 13B-8, RA EIAR supplement Appendix 13B	2025 Proposed		Tables 9-2- 26, IA EIAR Appendix 9-2	2027 without PD with NRRRA		Difference	
	28L	28R		28L	28R	28L	28R
00:00-00:59	13	1	00:00-00:59	15	1	-2	0
01:00-01:59	6	1	01:00-01:59	4	0	2	1
02:00-02:59	2	0	02:00-02:59	1	0	1	0
03:00-03:59	2	0	03:00-03:59	3	0	-1	0
04:00-04:59	12	0	04:00-04:59	9	0	3	0
05:00-05:59	11	0	05:00-05:59	10	0	1	0
06:00-06:59	3	27	06:00-06:59	3	24	0	3
07:00-07:59	10	30	07:00-07:59	12	29	-2	1
08:00-08:59	19	16	08:00-08:59	19	15	0	1
09:00-09:59	17	16	09:00-09:59	18	16	-1	0
10:00-10:59	15	16	10:00-10:59	14	16	1	0
11:00-11:59	17	16	11:00-11:59	16	16	1	0

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12:00-12:59	18	15	12:00-12:59	23	14	-5	1
13:00-13:59	22	20	13:00-13:59	21	22	1	-2
14:00-14:59	19	16	14:00-14:59	16	13	3	3
15:00-15:59	14	26	15:00-15:59	17	26	-3	0
16:00-16:59	12	19	16:00-16:59	12	19	0	0
17:00-17:59	20	19	17:00-17:59	15	18	5	1
18:00-18:59	19	17	18:00-18:59	25	18	-6	-1
19:00-19:59	17	25	19:00-19:59	18	25	-1	0
20:00-20:59	13	15	20:00-20:59	17	18	-4	-3
21:00-21:59	13	14	21:00-21:59	11	15	2	-1
22:00-22:59	25	9	22:00-22:59	24	9	1	0
23:00-23:59	16	3	23:00-23:59	15	4	1	-1
Total	335	321	Total	338	318	-3	3

The flight schedules therefore show that in theory the *2025 Proposed* should be noisier than *2027 Without PD With NRRRA* as there are more nighttime flights with *2025 Proposed*.

It could be assumed that in 2027 more quieter aircraft would be in use. To compare aircraft types, a comparison was made between Table 13B-2 from the Relevant Action EIA Supplement Appendix 13B and Table 9-2-8 of the Infrastructure Application EIA Appendix 9-2.

Difference between Table 13B-2 in Appendix 13B of RA EIA Supplement and Table 9-2-8 in Appendix 9-2 of the IA EIA				
		07:00-19:00	19:00-23:00	23:00-07:00
Airbus	A300	0	0	0
Airbus	A306	315	-341	186
Airbus	A319	579	0	0
Airbus	A320	4835	915	1801
Airbus	A320neo	-4949	-1388	-1079
Airbus	A321	-76	-26	124
Airbus	A321neo	-256	0	311
Airbus	A330	1609	0	186
Airbus	A330neo	-1993	0	0
Airbus	A350	0	0	0
ATR	42	0	0	0

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ATR	72	-473	-102	373
BAe	146/Avro RJ	0	0	0
Boeing	737-400	315	-63	244
Boeing	737-500	0	0	0
Boeing	737-700	0	0	0
Boeing	737-800	7113	-145	736
Boeing	737 MAX	-6708	-801	-964
Boeing	757	1235	-13	62
Boeing	767	-13	-52	373
Boeing	777	-13	0	186
Boeing	777X	-26	-26	0
Boeing	787	-1516	-26	373
Bombardier	CS300	-719	-39	0
Bombardier	Dash 8	-26	0	0
Convair	580	0	0	0
Embraer	E190/195	-191	-102	124
Embraer	E190-E2	-39	0	0
Airbus	A320neo+ (G3)	0	0	0
Airbus	A321neo+ (G3)	0	0	0
Airbus	A350neo (G3)	0	0	0
Boeing	787 NG (G3)	0	0	0
Boeing	797 NMA (G3)	0	0	0
Other		554	-379	-5
Total		-444	-2587	3032

For the Relevant Action 2025 *Proposed* scenario there are 3,032 more movements during the nighttime period compared to the 2027 *Infrastructure Without Proposed Development and With NRRRA* scenario.

	07:00-19:00	19:00-23:00	23:00-07:00
RA	156,291	47,581	35,922
IA	156,735	50,168	32,890
Difference	-444	-2,587	3,032

The comparison highlights that the 2027 Infrastructure scenario will have 1,079 quieter A320neo's and 964 quieter 737 MAX aircraft than the 2025 Relevant Action scenario.

In summary, the comparison of flight schedules and aircraft types has shown that there are more nighttime flights with the 2025 Relevant Action scenario and the 2025 Relevant Action has noisier aircraft than the 2027 Infrastructure Application.

It would therefore be expected that the *2025 Proposed* Relevant Action scenario would have more people in the 55dB Lnight contour than the *2027 Without PD With NRRRA* Infrastructure Application scenario. But this is not what is presented in the daa's documentation.

4.4 Population Datasets

In ANCA's Noise Abatement Objective Report, https://www.fingal.ie/sites/default/files/2023-08/Noise%20Abatement%20Objective%20Report_0.pdf, it states in section 7.3 that:

"The calculation of the number of people exposed to aircraft noise shall have regard for the most recent population data available and assessed against the population exposed to aircraft noise in 2019."

It further states that:

"The measures shall be calculated using population estimates representative of the current year or year of interest as well as against a baseline population representative of the year 2019. This shall be undertaken having regard for guidance published by the Environmental Protection Agency (EPA).

For example, when measuring the NAO in 2030, a population dataset should be used which is representative of the population in 2030. If the current year is 2030 then the population dataset for the current year shall be adopted.

If a forecast is being prepared for the year 2030, then a forecast population dataset for 2030 shall be adopted when measuring the NAO.

The inclusion of population growth data in the measurement of the NAO will ensure that land-use planning is considered. Whilst Dublin Airport will need to make efforts to reduce its noise impacts, by accounting for population growth, this will also ensure that land-use planning is effective."

ANCA also made reference to the use of the most up to date population figures during the consultation on the publication of the report, 'Noise Mitigation Effectiveness Review Report for 2022'. The daa's consultants BAP provided the noise modelling results for 2022 using the population dataset from the 2022 census. Using this dataset, the modelled results showed that the NAO criteria for >65dB Lden and >55dB Ln10 were breached in 2022. The report is available on ANCA's website:

<https://www.fingal.ie/sites/default/files/2023-08/Noise%20mitigation%20effectiveness%20review%20report%20for%202022.pdf>

In section 13B.4.1 of Appendix 13 of the Relevant Action Supplementary EAIR from September 2023, it states:

*“Dwelling data has been acquired from **GeoDirectory for 2019 Q2**, which was the dataset utilised in the original EIAR. The same dataset has been used for all assessment scenarios in this EIAR Supplement for consistency.”*

It is clear that the 2019 Q2 population dataset was used in the Relevant Action EIAR Supplement.

But in section 9-2.4.1 of Appendix 9-2 of the Infrastructure Application EIAR, it states:

*“Dwelling data has been acquired from **GeoDirectory for 2023 Q3**, which was the latest dataset available at the time of the assessment. Data has previously been acquired for 2019 Q2. which was the dataset utilised in the original EIAR. The 2023 dataset has been used for all assessments other than those used to compare with the NAO.”*

Therefore, the Relevant Action Supplement from September 2023 and the Infrastructure Application from December 2023 used different population datasets to calculate the population exposed to >55dB Lnight.

It is incumbent on the Board to request the daa to repeat the analysis of the populations exposed to >55dB Lnight using the 2023 Q3 dataset as it's obvious that using the 2019 Q2 dataset has led to a misleading lower figure than the true figure. The figures presented in the infrastructure application for *2027 Without PD With NRRA* are more representative of the true figures. But the figures theoretically should even be higher as more nighttime flights and noisier aircraft are forecast to be used in 2025 than in 2027.

4.5 2022 Noise Mitigation Effectiveness Review Report

As mentioned above, the NAO criterion for >65dB Lden and > 55dB Lnight were breached in 2022 as reported on in the Noise Mitigation Effectiveness Review Report.

There were 7% more nighttime flights in 2022 than in 2019, even though there were fewer aircraft movements in total. This highlights that the daa were targeting an increase in nighttime flights specifically at the time when they were meant to be reducing nighttime flights to less than 65, as per Condition 5 of the North Runway’s planning permission.

There were also issues raised with the use of the ‘actual’ modal split in 2022 as opposed to a 10-year average. ANCA have been quite clear that for historical data the ‘actual’ modal split should always be used. For future years modelling, an average is allowed.

The night-time NAO priority indicator

The fourth indicator of the NAO has regard to the total number of people exposed above the NAO priority level of 55dB L_{night}.

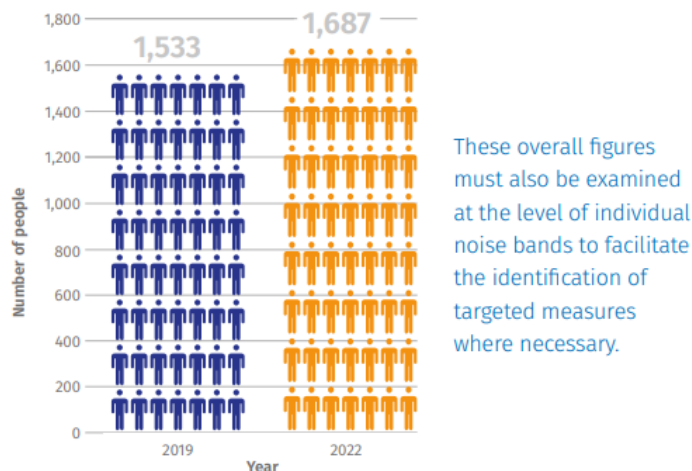
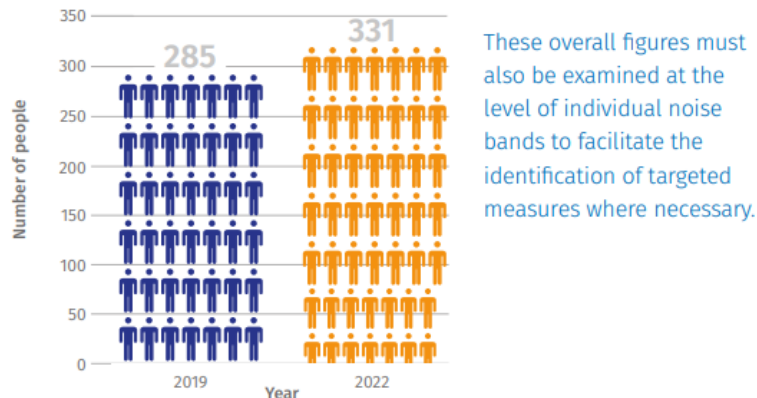


Figure 12 – Number of people exposed to aircraft noise above 55dB L_{night}

The day-evening-night NAO priority indicator

The fourth indicator of the NAO has regard to the total number of people exposed above the NAO priority levels of 65dB L_{den}.



These overall figures must also be examined at the level of individual noise bands to facilitate the identification of targeted measures where necessary.

Figure 16 – Number of people exposed to aircraft noise above 65dB L_{den}

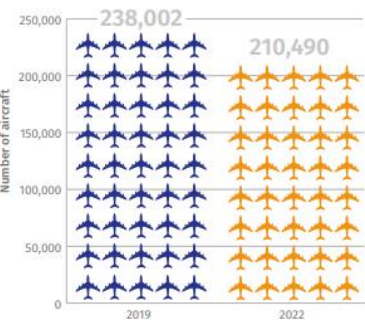


Figure 2(a) – Annual aircraft movements by year

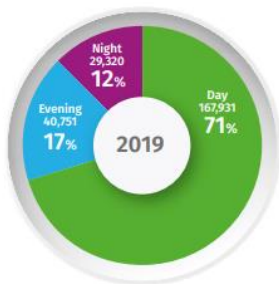


Figure 3 – 2019 Annual aircraft movements by period of the day

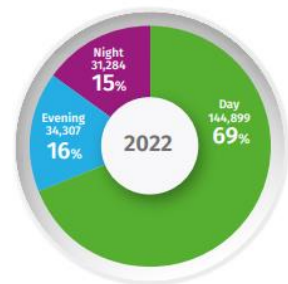


Figure 4 – 2022 Annual aircraft movements by period of the day

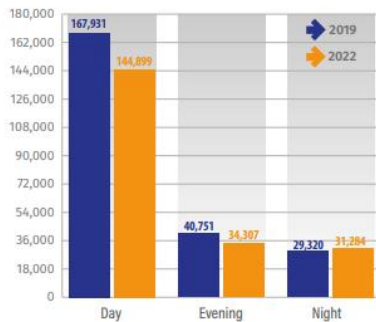


Figure 5 – Annual Aircraft Movements by year

In the Noise mitigation effectiveness review report for 2022, ANCA outlined where the dwellings were that were exposed to >55dB Lnight and who were not currently in an insulation scheme. This was presented in Figure 18:

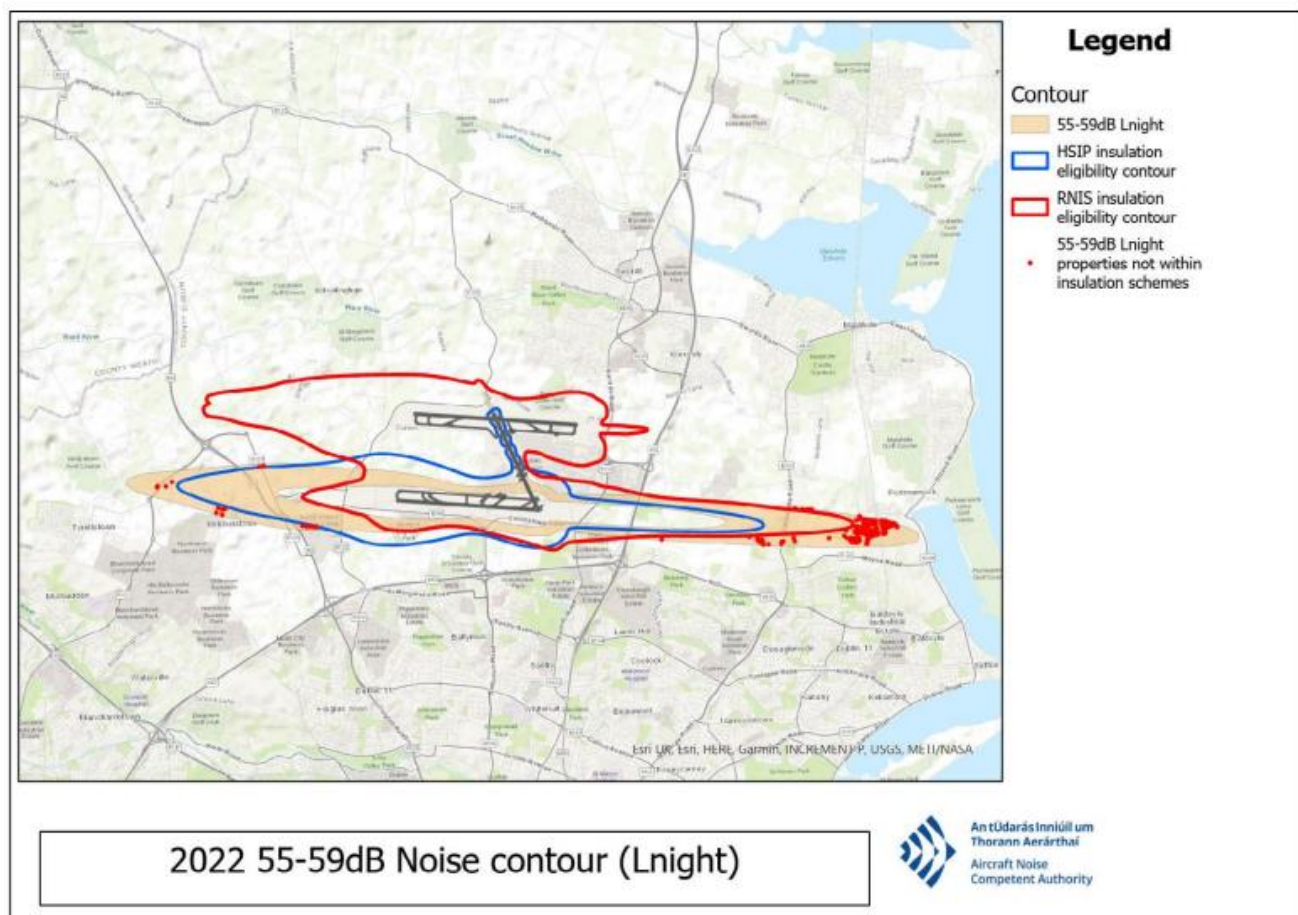


Figure 18 – 2022 55-59dB noise contour (L_{night})

From Figure 18 it is evident that the majority of dwellings were in South Portmarnock near the train station and directly under the South Runway flight path. It is worth highlighting that in 2022 there were only 210,490 aircraft movements compared to 238,002 in 2019, yet there were 7% more nighttime flights in 2022.

Based on EuroControl figures (<https://www.eurocontrol.int/Economics/DailyTrafficVariation-Airports.html>), there were 240,694 aircraft movements at Dublin Airport in 2023. That's 2,692 movements more than 2019 and 30,204 more than 2022. This increase in aircraft movements can be seen in the >55dB Lnight figure for the current state (2022-2023) of 4,426 people.

This annual report on the effectiveness of mitigation measures to achieve the NAO is mandated through section 21(2) of the Aircraft Noise Bill.:

(2) Subject to subsections (3) and (4), the competent authority shall, on or before each anniversary of the date of commencement of this section, review the effectiveness of the noise mitigation measures and operating restrictions (if any) on achieving the noise abatement objective.

The Aircraft Noise (Dublin Airport) Regulation Act 2019 also allows for a member of the public, upon whom there is a noise impact, request ANCA to review the effectiveness of the noise mitigation measures and operating restrictions on achieving the NAO.

(3) (a) The airport authority, or a person upon whom there is a noise impact from the airport, may, by notice in writing given to the competent authority, request the competent authority to review the effectiveness of the noise mitigation measures and operating restrictions (if any) on achieving the noise abatement objective.

(b) The competent authority shall, as soon as is practicable after it receives a request under paragraph (a), respond in writing to the requester.

(c) The competent authority may, at its discretion, comply with a request under paragraph (a).

Unfortunately to date ANCA has refused any request from the public under section 21(3)(a) and have relied on 21(3)(c) to refuse such requests. This is totally contrary to the legislators in the Oireachtas when the Bill was passed and therefore there is no agency available to monitor the effectiveness of noise mitigation measures from Dublin Airport which is not acceptable.

What is very alarming is that there have been many dwellings exposed to >55dB Lnight in 2019, 2022 and 2023 that have not been included in any existing insulation scheme. In fact, there is no insulation scheme for dwellings >55dB Lnight. This is truly shocking as the health effects of nighttime noise are well known and the Planning Authority attempted to take account of nighttime noise in their planning noise zones. Therefore, it is inexcusable that a Competent Authority for noise, charged with protecting the public's health from aircraft noise, has failed to install a noise insulation scheme for nighttime noise, independent of a planning application from the daa.

Both the Relevant Action and the Infrastructure Application fail the NAO and fail to protect the health of the most vulnerable of the population living close to Dublin Airport. The Board must reject this application on health grounds and breaches of the NAO.

5.0 Mitigation

5.1 Mitigation

In the eligibility contours, the daa have only proposed to insulate those dwellings exposed to greater than 55 dB L_{night} and those dwellings exposed to greater than 50 dB and having suffered an increase of +9dB in 2025. The populations to receive mitigation are highlighted in dark red in the table below. What is startling is that the population exposed to greater than 50 dB and suffering greater than a 3dB change are not mitigated. The areas in light red should be afforded mitigation at a minimum.

Absolute Noise Level Rating L _{night}	Change in Noise Level rating					
	Negligible 0-0.9	Very Low 1-1.9	Low 2-2.9	Medium 3-5.9	High 6-8.9	Very High >=9
Negligible < 40	Imperceptible	Imperceptible	Imperceptible	Not Significant	Slight	Moderate
Very Low 40-44.9	Imperceptible	Imperceptible	Not Significant	Slight	Moderate	Significant
Low 45-49.9	Imperceptible	Not Significant	Slight	Significant	Significant	Significant
Medium 50-54.9	Not Significant	Slight	Moderate	Significant	Significant	Very Significant
High 55-59.9	Significant	Significant	Significant	Significant	Very Significant	Profound
Very High >=60	Significant	Significant	Significant	Very Significant	Profound	Profound

6.0 Breach of 32mppa cap

6.1 Daa's 2023 Passenger Numbers

On the daa's corporate website, a section is devoted to 'Investor Relations' - <https://www.daa.ie/media-centre/investor-relations-2/> and passenger statistics are provided on a monthly basis.

The figures for December 2023 are provided in the following link - <https://www.daa.ie/wp-content/uploads/2023/12/daa-Monthly-Statistics-November-2023.pdf>:

Dublin Airport - December 2023 Statistics						
Region	Dec 2023	Dec 2022	% Change	YTD 2023	YTD 2022	% Change
Domestic	13,574	11,102	22%	156,570	128,549	22%
Great Britain	805,762	707,981	14%	9,518,467	7,778,809	22%
Rest of Europe	1,244,714	1,160,602	7%	18,672,355	15,980,480	17%
Transatlantic	254,897	238,231	7%	3,906,259	3,248,198	20%
Other International	86,862	72,066	21%	1,019,354	674,346	51%
Transit	632	19,226	-97%	249,589	275,180	-9%
Total Passengers	2,406,441	2,209,208	9%	33,522,594	28,085,562	19%
Commercial ATM's	17,321	16,378	6%	233,162	202,773	15%

The figures show that Dublin Airport handled 33,522,594 passengers up to the end of 2023 (YTD 2023). This included 249,589 transit passengers.

The daa have had plenty of advance notice of this inevitable breach and were served with enforcement warnings By Fingal County Council. The Board is reminded that the daa breached the 32m cap in 2019. Fingal County Council did not pursue enforcement proceedings based on the 2019 breach, but the enforcement section did acknowledge that a breach occurred.

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The daa have also uploaded passenger numbers for January and February of 2024. Both of these months are ahead of the same months in 2023 and therefore the cap is continuing to be breached on a rolling 12-month basis.

As per pre-planning guidance given by the Planning & Infrastructure Department to the daa in February 2020, and the decision by ABP in relation to the section 146 (A) request and the daa's own interpretation of the International Aviation Convention on passenger numbers, the daa knowingly and deliberately handled over 33.52 million passengers in 2023. It is inevitable that the daa will continue to breach the cap on a rolling monthly basis unless the Planning Authority enforces the condition imposed by ABP.

The Planning Authority has opened an enforcement investigation and sent a warning letter in February 2024 to the daa.

6.2 Passenger numbers provided to ANCA

ANCA made a request to the daa for data for the entire year of 2023. Included in this data was an updated ANCA reporting template, ‘A11429_CA045_1.0 ANCA Reporting Template 2023 Actual.xls’. In this reporting template the passenger numbers for 2023 are listed as 33.5m.

Also in the data request, ANCA requested the 2023 passenger numbers by month (question 2.1.8). The numbers provided by the daa are as follows:

2.1.8 Passenger numbers	
2023	
January	2,117,352
February	2,059,123
March	2,482,617
April	2,834,631
May	3,049,800
June	3,244,576
July	3,458,616
August	3,456,552
September	3,112,048
October	3,001,265
November	2,299,716
December	2,406,627
Total	33,522,923

It is very clear that the passenger numbers reported by the daa to ANCA breach the 32m cap.

6.3 Significance of Breaching the 32m Planning Condition

It is of extreme significance that the daa breached the 32m passenger cap again in 2023. In the Relevant Action planning application, the daa state in the Non-Technical Summary that:

*“The proposed Relevant Action, if permitted, would not change any of the other conditions of the North Runway Planning Permission, nor would it affect the maximum number of passengers currently permitted to pass through the terminals at Dublin Airport. **This passenger throughput is currently limited to 32 million passengers per annum (mppa) and will remain so unless a new application is made to raise the limit.** Under the proposed Relevant Action, it is expected that the 32 mppa level would be reached in 2025. A separate planning application will be required to increase the number of passengers above 32 mppa”.*

The Relevant Action’s whole premise is based on Dublin Airport not being able to cater for more than 32m passengers due to Conditions 3(d) and 5.

But Dublin Airport already handled 32.9m passengers in 2019 and 33.522m in 2023.

Therefore, this Relevant Action application should be a retention application due to the unauthorised development in 2023. Therefore, the Board must refuse planning permission.

CONCLUSION

The St Margaret's The Ward Residents submitted a report previously to the Planning Authority and the Board, 'DAA Report 22.10.2021.pdf'. The daa, Planning Authority and other State bodies need to explore relocation options for those people most affected by Aircraft noise. The daa are responsible for inflicting serious health harms on Fingal and East Meath residents and therefore the onus is on the daa to find a safe environment for these people and their families to live. To date the daa have not explored relocation options or taken on board the residual health effects and costs associated with their decisions. The community has proposed Thornton Hall as such a site that would be acceptable to the community and the daa needs to explore this option in depth with the various stakeholders. To finance this relocation scheme, the community is advocating an increase to the passenger charge imposed on travellers along the lines of the '*Polluter Pays*' principal. The monies raised from such a charge could be ring fenced to purchase Thornton Hall and provide housing for the displaced residents. The cost is borne by the '*Polluter*' and not by Government.

At a minimum, the Board needs to conduct a Regulatory Process under its remit as the Competent Authority for Noise. Over 240 dwellings have been identified as affected by the results of the new maps and the residents have not been afforded their statutory right to comment of these significant changes. In our opinion these maps should be determined as '*Significant*' and the general population allowed to comment. These maps further demonstrate that the current breach of the Noise Abatement Objective for Dublin Airport will be continued and exacerbated. The daa have not shown 'clean hands' in this planning process and have submitted these significant changes to the application at the last minute. This application is no longer confined to a Relevant Action where just 2 conditions of planning are to be amended. These changes require a full planning application as so many changes have been made since the planning permission of 2007. It has been pointed out that Significance was never ascertained for the planning permission of 2007 and no attempt has been made to determine the significance of the proposed operation against 2007, as is required under EIA legislation. This Relevant Action application is supposed to be limited to 32mppa yet the daa breached this cap in 2019 and again in 2023 and are on target for a further increase in the breach.

In conclusion, we call on Board Pleanála to reject this Planning application as the new maps prove that the application contravenes the conditions of planning of the North Runway and is in material contravention of both the Meath and Fingal Development Plans.

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