

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

14<sup>th</sup> September 2023  
[By Hand]

Dear Sir/ Madam

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

## 1.0 INTRODUCTION

### 1.1 Response to a Request for Further Information

The Applicant, daa plc has retained Tom Phillips + Associates to submit this Response to a Request for Further Information in relation to the 3rd Party Appeal (PL06F.314485) against the Notice of Decision of Fingal County Council (FCC) to Grant Permission for the proposed Relevant Action (RA) at Dublin Airport, Co. Dublin. As outlined in our response to the 3<sup>rd</sup> Party Appeal by St. Margaret's The Ward Residents Group (SMTWRG) dated 17<sup>th</sup> October 2022, it is the applicants position that FCC's Notice of Decision to Grant Permission should be upheld.

This correspondence sets out the applicant's response to An Bord Pleanála's (ABP) *Request for Further Information* in respect of Reg. Ref. PL06F.314485, dated 27<sup>th</sup> April 2023 (Appendix A) and ABP's further clarification on the *Request for Further Information*, in respect of Reg. Ref. PL06F.314485, dated 26<sup>th</sup> May 2023 (Appendix B), which was issued in response to the Clarification Request and Extension of Time Request letter by Tom Phillips + Associates, dated 16<sup>th</sup> May 2023 (Appendix C). Enclosed also as part of this Response to a Request for Further Information is a separate cover letter prepared by the Applicant outlining the national strategic importance of this application (Appendix D).

In addition to responding directly to the requested items, the project team, has provided updated material where relevant to ensure that ABP has the most up to date information available when making its assessment of the proposed relevant action application.

The original planning application was lodged on 18<sup>th</sup> December 2020<sup>1</sup>, during a very uncertain time for world aviation due to the Covid-19 pandemic. Subsequently, the aviation industry has

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<sup>1</sup> And subsequent response to FCC's request for further information (13<sup>th</sup> September 2021) was submitted

been going through a very dynamic and unprecedented period of recovery. Since the lodgement of the application and response to Fingal County Council's RFI on 13<sup>th</sup> September 2021, there have been a number of factors, which have resulted in more up to date information becoming available for a number of reasons including the following:

#### Quicker Return to Growth

The airport and demand for travel has recovered quicker than was expected following the Covid-19 emergency. In this regard, both the initial forecast schedule submitted with the application in December 2020 and update to same submitted with the RFI in September 2021 have been superseded due to a more rapid recovery of international aviation than was originally estimated.

As such, the Applicant has now provided an updated forecast schedule titled '*Quantification of Impacts on Future Growth-Addendum to the Analysis of June 2021*' dated September 2023 by Mott McDonald.

The updated forecast schedule is an addendum to the previous submitted study<sup>2</sup> and provides a current reflection of the forecast schedule for the relevant assessment years of 2025 and 2035<sup>3</sup>. The proposed Relevant Action does not seek any amendment of conditions of the North Runway Planning Permission governing the general operation of the runway system (i.e., conditions which are not specific to night-time use, namely conditions No. 3(a), 3(b), 3(c) and 4 of the North Runway Planning Permission) or any amendment of permitted annual passenger capacity of the Terminals at Dublin Airport. Condition No. 3 of the Terminal 2 Planning Permission (PL 06F.220670) and condition No. 2 of the Terminal 1 Extension Planning Permission (PL 06F.223469) provides that the combined capacity of Terminal 1 and Terminal 2 together shall not exceed 32 million passengers per annum (mppa) ('the 32mppa Cap'). As such the updated forecast schedules maintain the 32mppa Cap as a restriction.

The original forecasts saw passenger numbers reaching 32mppa by 2025 without the RA. The changes in the revised forecasts principally relate to the time when the 32mppa cap is reached, i.e. 32mppa will now be reached sooner than was previously estimated. As a result of the quicker return to growth now forecast, both the previously submitted *Economic Impact Assessment*<sup>4</sup> by Intervistas and the *Cost-Effective Analysis*<sup>5</sup> by Ricondo have been updated to provide ABP with the most up to date and current information.

If permitted, the Relevant Action proposes to amend Condition 3(d) and replace Condition No. 5 of the North Runway Planning Permission (ABP Ref. No.: PL06F.217429).

Condition No. 5 in particular is relevant in this regard and states the following:

*"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*

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<sup>2</sup> Dublin Airport Economic Impact of Operating Restrictions, Updated analysis in response to the ANCA RFI, version 1.3.1, June 2021

<sup>3</sup> 2022 was used as an assessment year in the submitted Revised EIAR (September 2021) but is no longer relevant.

<sup>4</sup> Dublin Airport Economic Impact of Operating Restrictions, UPDATE REPORT JUNE 2021

<sup>5</sup> Dublin Airport North Runway, Regulation 598/2014 (Aircraft Noise Regulation) Cost Effectiveness Analysis Report (Revision 2 – September 2021)

*out in the reply to the further information request received by An Bord Pleanála on the 5th day of March, 2007.”*

In undertaking the updated assessments as part of this Response to RFI, 2 no. scenarios have been assessed:

- 1) ‘Permitted Scenario’ - the forecasts used as in input to the assessment of this scenario assumes that Condition No. 5 will continue to apply in the assessment years of 2025 and 2035.
- 2) ‘Proposed Relevant Action’ the forecasts used as an input to the assessment of this scenario are unconstrained by condition no. 5 or the Noise Quota System (NQS)<sup>6</sup> as set out by in Condition 3 of Fingal County Council Notice of Decision to Grant relating to this application (F20A/0668).

#### Earlier Fleet Modernisation

During the intervening period between the previous RFI submission on 13<sup>th</sup> September 2021, FCC’s Notice of Decision to Grant Permission on 17<sup>th</sup> October 2022 and the submission of this response to ABP, the modernisation of the fleet at Dublin Airport has advanced at a quicker rate than initially anticipated. This has been captured within the various supporting materials provided with this response.

The updated assessment is based on the latest forecasts. These take account of changes in the fleet mix over recent years and how it is expected to continue to evolve. This means the forecasts allow for earlier fleet modernisation that has occurred, compared to what was previously forecast based on conservative assumptions.

The *Quantification of Impacts on Future Growth-Addendum to the Analysis of June 2021* This Addendum is an update to the report *Dublin Airport Operating Restrictions Quantification of Impacts on Future Growth* (version 1.3.1, 30 June 2021).

It updates previous Mott MacDonald analysis to reflect the latest information on schedules and traffic forecasts at Dublin Airport.

In relation to earlier fleet modernisation, it is noted that in 2019, around 91% of DUB operations use the current generation (G1) aircraft types, with 3% of movements operated by older aircraft (G0) and 6% of movements operated by the most modern (G2) types.

The study contained within the *Quantification of Impacts on Future Growth-Addendum to the Analysis of June 2021* predicts that *Our study predicts that the current G1 aircraft types will be largely replaced on a phased basis by next generation G2 types by the mid 2030’s. New next generation aircraft types (G3) are expected to enter service potentially from the late 2030s to replace G2 types, but no G3 types are assumed by 2040 at DUB.*

The key differences from the June 2021 study are:

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<sup>6</sup> The forecast used is not expected to result in an exceedance of the quota as set out in the NQS.

New annual air traffic forecast inputs to the June 2021 study were based on daa's demand forecasts from May 2021, developed in the middle of the COVID 19 pandemic when travel restrictions were still in place and the trajectory for recovery was uncertain.

This September 2023 Addendum is based on updated (May 2023) daa forecasts which take account of actual traffic recovery and known schedules for the Summer 2023 season.

Updated airline fleet renewal information and forecasts the COVID 19 pandemic resulted in many airlines grounding aircraft temporarily as well as retiring older types, while the aircraft manufacturers (eg, Airbus and Boeing) reduced aircraft deliveries.

At the time of the June 2021 study, the Boeing 737MAX had just re-entered service after a 2 year grounding following fatal accidents in 2018/19. Ryanair had yet to take delivery of any B737MAX aircraft and there was uncertainty around how quickly the new aircraft would be rolled out.

This Addendum updates the airline fleet modernisation assumptions in light of up to date information. In general, newer, quieter aircraft are entering service at Dublin Airport (DUB) more quickly than was assumed in 2021.

Changes in the Baseline schedule in the June 2021 study were based on a busy day schedule from Summer 2019, before the COVID 19 pandemic. This Addendum is based on a Summer 2023 busy day schedule, reflecting changes that occurred during the pandemic and the subsequent recovery. In particular, there was growth in the number of night period freighter services during the pandemic, which are reflected in this latest analysis.

#### Flightpath changes

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 (18<sup>th</sup> December 2020 & RFI Submission 13<sup>th</sup> 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 (23<sup>rd</sup> February 2023). This information is now provided in the attached EIAR Supplement (September 2023).

#### Latest Activity Details

During the intervening period, further information has been gathered on the operation of the airport with the North Runway, and we are therefore in a position to update modelling assumptions into the future based on the latest details.

This includes updates to how the routes from the runways have been used, and later noise information from the Noise and Track keeping system. The latter includes noise information for activity on the North Runway, and for modernised aircraft types. This information is now provided in the attached EIAR Supplement (September 2023).

### Further detail on Future Plans and Projects at the Airport

Chapter 22 of the Revised EIAR (September 2021), outlines the need to consider the future development of Dublin Airport as part of the Relevant Action application and states that it is:

*“...considered appropriate that the competent authority assessing the proposed Relevant Action would have an overview of those longer-term plans, so that the proposed Relevant Action can be viewed and assessed in that wider context, with account being taken of planned future development at Dublin Airport”*

Section 22.4 of the Revised EIAR (September 2021), provides an overview of the emerging documents and studies being prepared by the applicant as well as reasonably foreseeable major projects planned at Dublin Airport.

As a result of the above referenced passage of time since the submission of the Revised EIAR (13<sup>th</sup> September 2021), the section on emerging documents and studies being prepared by the applicant as well as reasonably foreseeable major projects planned at Dublin Airport has been updated in the now submitted EIAR Supplement (September 2023) to reflect current understanding and information available. This update is described in greater detail below at Section 2.0 and is set out in the addendum to Chapter 22 of the submitted EIAR Supplement (September 2023).

### Other Passage of Time Changes

Given the passage of time since the submission of the Revised EIAR in September 2021 (c.24 months), it was considered appropriate to check whether there have been any material changes to the existing environmental baseline, legislation, policy, and guidance and designations under the relevant EU Directives. The EIAR Supplement (September 2023) now provided includes a review of changes over the intervening 24-month period and includes updated information and assessment where required.

### Specific Changes as a Result of the ABP RFI

The specific information requests from ABP have resulted in the need to update information previously contained and assessed within Chapter 13 (Aircraft Noise and Vibration) and Chapter 14 (Ground Noise and Vibration) of the Revised EIAR supplement (September 2023). This information is now provided in the attached EIAR Supplement (September 2023).

## **1.2 Format of this Response**

This Response is formatted as follows:

**Section 1** (this section) sets out the introduction and context of the RFI Response.

**Section 2** presents an overview of the additional information provided in the various addenda to the EIAR Supplement (September 2023).

**Section 3** sets out a summary of the Applicant's response to Items Nos. 1 to 3 of the RFI.

**Section 4** sets out a list of the accompanying documentation included in this RFI response.

**Section 5** sets out a conclusion of the RFI Response.

In addition, the following documents are appended:

**Appendix A:** *Request for Further Information*, dated 27th April 2023 (ABP Ref. PL06F.314485).

**Appendix B:** Clarification on *Request for Further Information*, dated 26th May 2023 (ABP Ref. PL06F.314485).

**Appendix C:** Request for Clarification & Extension of Time by TPA, dated 16<sup>th</sup> May 2023

## 2.0 SUMMARY OF EIAR SUPPLEMENT (SEPTEMBER 2023) UPDATES

### 2.1 History and Context of EIAR

#### Original EIAR (December 2020)

The EIAR (December 2020) in support of the Relevant Action application was first submitted in December 2020. A revised EIAR was then submitted in Response to a Request for Further Information from FCC in September 2021.

Section 1.7 of the original EIAR (December 2020) outlined the assessment undertaken by Mott McDonald<sup>7</sup> comparing the Permitted/Constrained scenario and the Proposed/Unconstrained Scenario.

The permitted scenario assessed was with Condition No. 3(d) and Condition No. 5 in place in the future years 2022 and 2025.

The proposed scenario assessed assumed the planning conditions imposed under the North Runway Permission were implemented at Dublin Airport, with the exception of Condition 3(d) and 5 in the future years of 2022 and 2025 i.e. that the proposed Relevant Action would be in place.

The following factors were assumed in each case:

- 2022 was considered the year in which North Runway was expected to be operational.
- 2025 was considered the first year 32 mppa is forecast to be reached with North Runway operations

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<sup>7</sup> *Quantification of Impacts on Future Growth, September 2020 Update – 2022-2025 Period, September 2020 – version 5.3*

### Revised EIAR (September 2021)

Section 1.5 of the Revised EIAR (September 2021) outlined an updated assessment undertaken by Mott McDonald<sup>8</sup> comparing the Permitted/Constrained scenario and the Proposed/Unconstrained Scenario in the future years 2022 and 2025 and 2035.

In the Revised EIAR (September 2021), the permitted scenario assessed was with Conditions 3(d) and 5 in place in the future years 2022 and 2025 and 2035.

The proposed scenario assumed that the planning conditions imposed under the North Runway Permission were implemented at Dublin Airport, with the exception of Condition 3(d) and 5, in the future years of 2022 and 2025 and 2035 i.e that the proposed Relevant Action would be in place.

To summarise, the following factors were assumed in each case:

- 2022 was considered the year in which North Runway was expected to be operational.
- 2025 was considered the first year of highest use of the runway system in the Proposed Scenario (i.e. when 32 million passengers per annum throughput is first expected to be reached but not exceeded).
- 2035 was included in response to a request from FCC for Further Information which sought assessment a longer-term scenario (i.e. 10 or 15 years post opening year scenario (2022)).

### EIAR Supplement (September 2023)

For the reasons outlined above at Section 1.1 and below in the following sections of this response to ABP's RFI, an EIAR Supplement (September 2023) to the Revised EIAR (September 2021) has been prepared and is titled 'EIAR Supplement (September 2023)' by Aecom.

The EIAR Supplement (September 2023) outlines the updated assessment undertaken by Mott McDonald<sup>9</sup> comparing the Permitted/Constrained scenario and the Proposed/Unconstrained Scenario.

In the EIAR Supplement (September 2023), the permitted scenario assessed is with Conditions 3(d) and 5 in place in the future years 2025 and 2035. Note 2022 is no longer assessed as it has been surpassed.

In this respect, the North Runway only became operational in August 2022, more than halfway through the 92 day period referred to in Condition 5, and accordingly Condition no. 5 did not become applicable in 2022. ABP should also note that given uncertainty and differing views surrounding the proper interpretation and application of Condition no. 5, the IAA did not consider it appropriate to declare reduced capacity in setting parameters for slot allocation at Dublin Airport on the basis of Condition no. 5 for Summer 2023 and Winter 2023. However, on 28<sup>th</sup> July 2023, Fingal County Council issued an enforcement notice under section 154 of

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<sup>8</sup> Quantification of Impacts on Future Growth Updated analysis in response to the ANCA RFI, June 2021 – version 1.3.1 (Final)

<sup>9</sup> Quantification of Impacts on Future Growth-Addendum to the Analysis of June 2021 -September 2023



the Planning and Development Act, 2000, as amended, in respect of Condition no. 5. While that enforcement notice is the subject of pending judicial review proceedings (and is currently stayed by Order of the High Court in the context of those proceedings), it is anticipated that current developments may result in a definitive clarification of the meaning and scope of Condition no. 5 in the near future. Accordingly, and in the light of the service of the enforcement notice, it is considered appropriate to assume the application of Condition no. 5 in assessing the permitted scenario for future years 2025 and 2035.

In the now submitted EIAR Supplement 2023, the proposed scenario assessed assumes that the planning conditions imposed under the North Runway Permission are implemented at Dublin Airport, with the exception of Condition 3(d) and 5, in the future years of 2025 and 2035. The proposed scenario also incorporates the F20A/0668 Notice of Grant by FCC.

The following factors are assumed in each case:

- North Runway is operational.
- 2025: the first year of highest use of the runway system in the Proposed Scenario (i.e. when 32 million passengers per annum throughput was first expected to be reached but not exceeded). This is also the first year of predicted maximum environmental effects in the Proposed Scenario.
- 2035: this year has been included in the assessment in response to a request from Fingal County Council for Further Information which sought assessment of a longer-term scenario (i.e. 10 or 15 years post opening year scenario (2022)).

Where updates have occurred, they are outlined in the EIAR Supplement (September 2023) and set out in the Introduction of the Supplement. What follows is a summary of the content now included in the *'EIAR Supplement 2023'* by Aecom.

## 2.2 Introductory Section of EIAR Supplement 2023

As part of this *Response to the Request for Further Information*, the Project Team, in recognising the availability of updated information due to the passage of time since the application was first lodged, have taken the opportunity to provide a supplement to the Revised Environmental Impact Assessment Report, dated September 2021. For the avoidance of doubt, the Revised EIAR, dated September 2021, will remain as the 'base' document and the supplement provided as part of this *Response to the Request for Further Information* is strictly for the purposes of updating the most relevant information.

It should be noted that the Project Team has considered the potential impacts of the updated information and other relevant developments since September 2021 across the range of environmental factors and effects assessed in the Revised EIAR (September 2021). In many cases, there will be no or no material change to environmental effects arising from those updates and developments. Accordingly, the supplement addresses only those aspects of the Revised EIAR (September 2021) which are affected.



The principal changes addressed by the EIAR supplement (September 2023) are:

1. Actual flightpaths from North Runway upon commencement differing from assumed flightpaths used for modelling/assessment purposes in the previous EIARs;
2. Updated air traffic forecast data;
3. Earlier fleet modernisation;
4. The North Runway becoming operational in August 2022;
5. Other 'passage of time changes' that include changes to the environmental baseline conditions and changes to relevant aviation, planning and environmental legislation, policy, guidance and best practice.

In relation to Chapter 6: Planning and Development Context of the Revised EIAR (September 2021), we note that in the intervening period, Fingal County Council have now adopted a new Development Plan (Fingal County Development Plan 2023-2029), which came into effect on 5<sup>th</sup> April 2023<sup>10</sup>.

The proposed RA and FCC's Notice to Grant is consistent with the policy objectives as set out within the Fingal County Development Plan 2023-2029.

These policies are largely supportive and reflective of the strategic importance of the growth of Dublin Airport and in particular, encourage the consideration of the health impacts of local residents to night-time noise, *"taking into account the EU Regulation 598/2014 (or any future superseding EU regulation applicable) having regard to the 'Balanced Approach'"*

Policy Objective DA 016 is of particular relevance to the Proposed Relevant Action where it is stated that it is an objective,

*"To encourage and promote the introduction of a noise quota system at Dublin Airport to encourage Airlines to use quieter aircraft so as to prevent and reduce, where necessary, on a prioritised basis the effects due to long term exposure to aircraft noise."*

Accordingly, it is not necessary to provide any updated assessment in respect of Chapter 6 of the Revised EIAR (September 2021).

## **Chapter 7: Population and Human Health**

This chapter of the EIAR details the findings of an assessment of the likely effects on population and human health as a result of the proposed Relevant Action.

This chapter requires to be updated to take account of the revised noise and climate forecasts discussed below. The opportunity has also been taken to refresh the literature review with the latest research. This information is now provided in replacement Chapter 7 of the attached EIAR Supplement (September 2023).

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<sup>10</sup> And further confirmed by a Ministerial Direction issued on 28<sup>th</sup> July 2023

## **Chapter 11: Climate and Carbon**

Updates to this chapter have been made to reflect changes to the technical guidance used in the original chapter since it was written. In addition, the climate policy background has developed since the application was made in September 2021 and the chapter has been revised to reflect this. This information is now provided in replacement Chapter 11 of the attached EIAR Supplement (September 2023).

## **Chapter 13: Aircraft Noise and Vibration**

This chapter is a replacement to that in the revised EIAR submitted in September 2021 (2021 EIAR). The update is in response to a number of changes that have taken place in the interim as noted in the EIAR addendum (September 2023) that could affect the findings of the earlier assessment.:

## **Chapter 14: Ground Noise and Vibration**

Chapter 14 of the Revised EIAR (September 2021) contains errors in some of the assessments which have resulted in an over reporting of ground noise impacts. The opportunity is being taken to correct these errors and demonstrate that the actual noise impact is lower than originally predicted. This information is now provided in replacement Chapter 14 of the attached EIAR Supplement (September 2023).

## **Chapter 22: Future Development Plans**

Plans for future developments (not yet submitted for approval) by the applicant have been further advanced since 2021. This includes the forthcoming Infrastructure Application. As such, the opportunity is being taken to refresh the chapter with details that were not available when it was originally written.

The projects considered in the replacement Chapter 22 of the EIAR Supplement (September 2023) are as follows:

### *Airport Drainage Projects Arising from the Drainage Management Plan DMP*

In 2018, the Applicant embarked on the Dublin Airport Drainage Masterplan (DMP) as part of its Sustainability Strategy. The DMP is a holistic long-term masterplan for drainage infrastructure at Dublin Airport.

As part of the DMP a series of incremental improvements were identified to 2030 and beyond including a rolling programme of infrastructure rehabilitation, maintenance and upgrades of existing facilities,. Post-2030, further applications for DMP development would include:

- Additional pollution control infrastructure;
- Additional hydraulic capacity; and
- Further clean surface water attenuation.

### Infrastructure Application

The RA application provided details in respect of the 'Infrastructure Application' to provide for an increase in passenger numbers at Dublin Airport as well as major investment in airport infrastructure.

Since then, Pre-Planning engagement has commenced with the Planning Authority and the Relevant Action (RA) project team have further developed the details regarding the future plans and projects which encompass the pending infrastructure application, as such the EIAR Supplement (September 2023) has been revised to take account of these future plans and projects insofar as practicable at this stage.

Please refer to replacement Chapter 22 of the EIAR Supplement (September 2023) for further details.

### Other Projects

Other 'business as usual' projects are planned by the Applicant to ensure that Dublin Airport remains a safe and efficient airport. These include many projects set out in the CIP 2020+, concerning maintenance of runways and taxiways, ongoing upgrade and replacement of aging infrastructure in the airfield, the terminals, and other parts of the airport.

## **3.0 RESPONSE TO FURTHER INFORMATION REQUEST**

### **3.1 Item No. 1: Impact of Peak L<sub>max</sub> Noise Levels from Air Traffic Movements (ATMs) on Sleep**

Item No. 1 states:

*"The assessment in the EIAR of the effects of noise from ATMs at night (2300 to 0700 hrs) is based on energy averaging noise metrics over relatively long periods e.g. 8 hrs, correlated with the percentage of the exposed population likely to self-report being highly sleep disturbed (%HSD), assessed with a standardised scale based on the guidance in the World Health Organisation's (WHO) Environmental Noise Guidelines 2018. (WHO ENG 2018)*

*However, aircraft noise is not experienced in an "average" fashion. It consists of periods of comparative quiet when there are no aircraft flying near or over a receptor interspersed with relatively short periods of noise when an aircraft approaches a receptor, builds to a peak at its closest approach and then decays as the aircraft moves away from a receptor.*

*The EIAR includes information on peak L<sub>max</sub> noise levels from ATMs and the number of these events at night in terms of the N<sub>60</sub>, N<sub>651</sub> noise contours for the 92 day summer average of ATMs and airport modes, and the N<sub>60</sub> metric and L<sub>max2</sub> for the single modes of airport operation. But these data are presented for information purposes only and there is no analysis of the effect of peak L<sub>max</sub> noise levels from ATMs on additional awakenings at night regarding the baseline and consented scenarios.*

*You are requested to assess the probability of additional awakening due to the peak L<sub>A,s,Max</sub> of ATMs at night between 2300 and 0700hrs for the 92 day summer average of ATMs and airport modes, and for the single modes of airport operation and for the likelihood of*

*additional awakenings for the overall annual average number of ATMs at night, based on the approach described in the review supporting the WHO ENG 2018 (Environmental Noise Guidelines for the European Region: A Systematic Review on Environmental Noise and the Effects on Sleep -International Journal of Environmental Research and Public Health).*

*The Scenarios tested should include baseline conditions and the future operation of the airport proposed under the current application.”*

*As per the ABP correspondence dated, 26th May 2023 (Appendix B), the term “baseline conditions and the future operation of the airport” was clarified as referring to the following years to be tested as part of the scenarios:*

- i. 2018,*
- ii. 2025 Permitted and,*
- iii. 2025 Proposed*

### **3.1.1 Applicant’s Response Summarised**

In response to Item 1, we refer to the *Noise Modelling Report* prepared by Bickerdike Allen Partners and enclosed as part of this response. The report can be summarised as follows:

ABP note that aircraft noise is not experienced in an “average” fashion and so seek further information in addition to that provided by the  $L_{\text{night}}$  metric which is an energy average. However, it should be noted that the use of the  $L_{\text{night}}$  metric is not treating the aircraft noise as a steady level, it is simply a way of adding up the noise from the individual aircraft events in the period. In the supporting research the responses from individuals who have experienced a series of individual aircraft events are attributed to such an overall level to allow comparison to other recipients who have experienced a different series of aircraft events to establish a typical response.

The ABP request is for an alternative measure of sleep disturbance which assesses the probability of additional awakening based on the maximum noise level ( $L_{A5, \text{max}}$ ) from individual events. This is set out in WHO Environmental Noise Guidelines for the European Region: A Systematic Review on Environmental Noise and Effects on Sleep.

The term awakenings in this context is that used by researchers in the field and differs from the lay meaning of becoming awake and aware of your surroundings. As noted in the WHO systematic review ‘a healthy adult briefly awakens ca. 20 times during an 8 h bed period (most of these awakenings are too short to be remembered the next morning)’.

The probability of additional awakenings has been determined for a population centred on the airport under various scenarios. These are expressed as overall totals of the expected number of additional awakenings across the over 1 million people.

While there are no specific criteria by which to judge the significance of the number of additional awakenings the relative values for the scenarios can be compared. Considering the annual situation, a reduction is expected from 2018. In 2025 this is by around 40% irrespective of whether the proposed change to the controls at night proceeds. By 2035 a greater reduction is forecast, by around 55% with the proposed change, and 65% without it.

The EIAR (September 2021) assessed the effects of noise at night using the  $L_{night}$  metric to determine the population highly sleep-disturbed (%HSD). The values from that assessment are of a similar magnitude to the number of additional awakenings and show the same pattern across the scenarios.

In addition to the discussion contained in the report by Bickerdike Allen Partners, the Board will note the accompanying report prepared by Dr. Thomas Penzel, an IEEE fellow member and expert on aircraft noise and health related issues. The report provides commentary on the suitability of probability of additional awakenings as an appropriate measure of the effects of aircraft noise and outlines the many variables and research findings which have resulted in debate within the scientific community on this matter. The report concludes that there is no conclusive research on the appropriateness of using the probability of additional awakenings in order to assess the effects of peak noise levels of Air Traffic Movements (ATMs).

### 3.2 Item No. 2: Sensitivity Testing of the Population Numbers Covered by the Noise Contour Predictions

Item No. 2 states:

*“The noise contour and population exposed data presented in the EIAR of predictions of future scenarios is based on assumptions on the number of ATMs and the fleet mix at the airport. Despite best endeavours to be precise, such assumptions are estimates based on forward projections that will inevitably introduce a degree of uncertainty into the prediction of future noise.*

*To better understand what the consequences of uncertainty in the input data might be, or at least the associated trends with such uncertainty on the area covered, and the population affected by the noise contours presented in the EIAR. You are requested to present further analysis by sensitivity testing of:*

- (a) the noise contours,*
- (b) the area covered and*
- (c) crucially the number and type of sensitive receptors affected when assessed using the significance criteria in the EIAR, based on the assumption of +/- 1 dBA change in the predicted noise levels (crudely equivalent to an approximately 25% change in the area of the noise contours or all things being equal the number of ATMs used to calculate the noise contours).”*

#### 3.2.1 Applicant's Response Summarised

In response to Item 2, we refer to the *Noise Modelling Report* prepared by Bickerdike Allen Partners and enclosed as part of this response.

Information has been prepared in response to the request for the years of 2025 and 2035. The approach has been to consider two scenarios for each year. In the first it is assumed that for both the Permitted and Proposed scenarios the noise is 1 dB(A) higher. For the second it is assumed that for the Permitted and Proposed scenarios the noise is 1 dB(A) lower.

This approach is on the basis that the input data for the future scenarios both Permitted and Proposed are either the same in both scenarios, for example the noise performance of the aircraft and the routes flown, or are related, like the forecasts. The latter have a common basis, with adjustments made to reflect the difference between the scenarios. Also given the other controls on the airport such as the limit on passenger numbers, for which no change is sought as part of this application, there being significantly more movements in the Proposed scenario than the Permitted scenario does not seem realistic.

The results prepared include noise contours, their areas, and the sensitive receptors they contain, both residential and other noise sensitive buildings. No allowance has been made in the figures for any benefits of sound insulation schemes, as these could vary in extent and so would be another variable.

Compared to the exposures detailed in the replacement Chapter 13 Air Noise those for the corresponding Permitted and Proposed scenarios where the noise is 1 dB(A) higher are consequently higher, and those for the corresponding Permitted and Proposed scenarios where the noise is 1 dB(A) lower are consequently lower.

In terms of significance for residential receptors the situation is that although the absolute numbers vary, the relationship between those with beneficial and adverse effect is generally consistent under each of the scenarios. When it comes to non residential receptors, the findings for the sensitivity scenarios are also consistent with those in the EIAR (September 2021).

### 3.3 Item No. 3: Baseline years assumed in the assessment

Item No. 3 states:

*"The EIAR states in relation to the choice of year 2018 as a baseline against which to compare future scenario, that;*

- a. "Since the North Runway Planning Permission was granted, there has been a rapid growth in passenger numbers, and the current runway infrastructure was already at capacity at peak times in 2018 and 2019*

*And*

- b. "The year 2018 was chosen as it was the most recent year with full activity data available when this relevant action assessment process commenced. It is also the first year of the 2018-2023 Dublin Airport Noise Action Plan."*

*Based on the above it is presumed the annual and 92 day summer period numbers of ATMs were lower prior to 2018.*

*Consequently, you are requested to comment on why:*

- a) the baseline figures for 2019 were not used for the purposes of analysis.*
- b) When prior to 2018 were the annual and 92 day summer period numbers of ATMs last more than 25% below those in 2018, and*

- c) *If the numbers of ATMs were last more than 25% below those in 2018 after the Northern Runway came into use, what would be the difference in terms of the number of dwellings and persons likely to experience an increase in  $L_{night}$  to over 50 dBA and 55 dBA compared to the numbers presented in the EIAR."*

As per the ABP correspondence dated, 26th May 2023 (Appendix B), the figure of 25% contained in Item 3 (c) was clarified through the following rephrasing:

"c) Assuming the fleet mix stays the same but the assumed numbers of ATMs at night are 25% below those in 2018, what would be the difference in terms of the a) number of dwellings and b) persons likely to experience an increase in  $L_{night}$  to over 50 dBA and 55 dBA compared to the numbers presented in the EIAR."

### 3.3.1 Applicant's Response Summarised

In response to Item 3, we refer to the *Noise Modelling Report* prepared by Bickerdike Allen Partners and enclosed as part of this response.

- a) When undertaking environmental assessment, the approach is to set out the current situation and then to consider what may happen in the future with or without the change being sought. This allows changes that are going to happen irrespective of the change being sought to be accounted for. Information on the current and past situations is included to provide context but is not part of the analysis. Information on past activity, both in 2018 and 2019 was included in the 2020 EIAR.
- b) Information is presented on past night activity which demonstrates that in 2014 the number of movements, both annually and in the summer period, were last at least 25% below those in 2018.

• Year / Scenario	Night Movements	
	Annual	Summer
2018	27,896	8,755
2018 minus 25%	20,922	6,566
2017	27,287	8,689
2016	24,753	7,800
2015	22,546	7,073
2014	19,576	6,253

**Table 1: Past Night Movements (Source: Bickerdike Allen Partners – Noise Modelling Report 2023)**

- c) The number of dwellings and people forecast to experience an increase in their  $L_{night}$  level to over 50 dB(A) and over to over 55 dB(A) has been determined. This has been done by comparing against the situation in the Permitted Scenario in the relevant year. The results



show that there are dwellings and populations whose exposure increases in both years under either the Proposed Scenario or the Proposed Reduced Scenario although the numbers are smaller in the case of the latter which has fewer movements.

The analysis also finds that both of the Proposed scenarios there are dwellings and populations overflowed by departures to the west from the South Runway that benefit. In particular this affects Blanchardstown and the surrounding communities which are relatively densely populated compared to other areas overflowed.

Scenario	No. of Dwellings with Increase in $L_{night}$ to Over		Population with Increase in $L_{night}$ to Over	
	50 dB(A)	55 dB(A)	50 dB(A)	55 dB(A)
2025 Proposed	1,692	387	4,895	1,245
2025 Proposed Reduced	387	46	1,139	134
2035 Proposed	1,511	567	4,128	1,398
2035 Proposed Reduced	324	29	1,064	88

**Table 1: Additional Night Exposure Compared to Permitted Scenario**

Further details on the above are included in the accompanying Noise Modelling Report prepared by Bickerdike Allen Partners.

#### 4.0 CHECKLIST OF DOCUMENTATION ENCLOSED

1 No. hard copy & 1 No. electronic copy (USB Flash Drive) of the following documentation is provided with the 'Further Information' response:

- *Response to a Request for Further Information*, prepared by Tom Phillips + Associates, Town Planning Consultants dated 14<sup>th</sup> September 2023 (this document);
- *Supporting letter* from the Applicant (daa plc) outlining the importance of the project, dated 13<sup>th</sup> September 2023.
- *Noise Modelling Report* prepared by Bickerdike Allen Partners (BAP) and dated September 2023
- *EIAR Supplement*, dated September 2023, by Aecom;
- *Addendum to Appropriate Assessment Screening Report* dated 11<sup>th</sup> September 2023, by Aecom;
- Updated Economic Impact Assessment by Intervistas titled *Dublin Airport economic Impact of Operating Restrictions – Update* and dated September 2023;
- *'Quantification of Impacts on Future Growth-Addendum to the Analysis of June 2021* by Mott McDonald dated September 2023;
- Independent Opinion by Dr. T. Penzel regarding the use of Awakenings as a method for assessment of noise impacts on sleep disturbance;
- *Revised Cost-Effective Analysis* by Ricondo; and
- *Revised Noise Report for Cost-Effective Analysis* prepared by Bickerdike Allen Partners (BAP).

#### 5.0 CONCLUSION

We trust that the above referenced information now submitted fully responds to ABP's *Request for Further Information* in respect of Reg. Ref. PL06F.314485, dated 27<sup>th</sup> April 2023 (Appendix A) and ABP's further clarification on the *Request for Further Information*, in respect of Reg. Ref. PL06F.314485, dated 26<sup>th</sup> May 2023 (Appendix B).

We would like to draw attention to the fact that the application for a 'Relevant Action' was initially lodged to Fingal County Council on 18 December 2020. It is therefore noteworthy that almost 3 years has passed since the application was first lodged and a final decision on this matter is still awaited. During the intervening period, the aviation landscape has changed significantly, in part due to the National response to the COVID-19 pandemic and the resultant return to growth at Dublin Airport, together with the opening of the North Runway in August 2022.

We wish to acknowledge that the case currently before the Board is one of a complex nature and that the various technical aspects of this case require careful consideration. Furthermore, we would also like to acknowledge the sensitive nature of the appeal in terms of local interest and are committed to the continued engagement with local communities.

Notwithstanding this, we would like to note that the application, to which this appeal relates, is of significant National and Regional importance. In this regard, we wish to draw the

attention of the Board to the National Aviation Policy, 2015 (NAP<sup>11</sup>) and National Planning Framework (NPF)<sup>12</sup> and particularly Section 4.5 of the NAP, which highlights the need to optimise the overall infrastructure at Dublin Airport to accommodate 'changing passenger and air-cargo needs and carrier needs'. Furthermore, we would like to highlight National Strategic Outcome 6 of the NPF which outline the importance of high-quality international connectivity.

Whilst the proposed 'Relevant Action' application is understandably complex and requires adequate time for ABP to fully consider the merits of the proposal, the longer uncertainty remains regarding the outcome of the application, the ability of Dublin Airport to optimise the use of the recently opened North Runway and support the goals outlined in National policy remains uncertain. It is therefore of the utmost importance that a decision on the 'Relevant Action' is made in a timely manner.

We would therefore welcome a decision on the appeal as expediently as possible following the receipt of this requested further information.

Yours faithfully



**Gavin Lawlor**  
**Director**  
**Tom Phillips + Associates**

Encl.

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<sup>11</sup> A National Aviation Policy for Ireland, August 2015, Department of Transport, Tourism and Sport

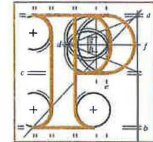
<sup>12</sup> Project Ireland 2040, National Planning Framework

APPENDIX A: REQUEST FOR FURTHER INFORMATION, DATED 27<sup>th</sup> April 2023 (ABP REF. PL06F.314485)

Our Case Number: ABP-314485-22

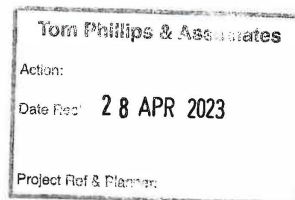
Planning Authority Reference Number: F20A/0668

Your Reference: DAA PLC



An  
Bord  
Pleanála

Tom Phillips & Associates  
80 Harcourt Street  
Dublin 2  
D02 F449



Date: 27 April 2023

**Re:** A proposed development comprising the taking of a 'relevant action' only within the meaning of Section 34C of the Planning and Development Act 2000, as amended, which relates to the night-time use of the runway system at Dublin Airport  
Dublin Airport, Co. Dublin

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer to the above-mentioned appeal.

The Board has examined the appeal and is of the opinion that certain information/clarification is necessary for the purpose of enabling it to determine the appeal.

In accordance with section 132 of the Planning and Development Act, 2000, (as amended), you are required to submit, on or before **17<sup>th</sup> May 2023**, the following;

Having regard to the documentation submitted and specifically in relation to the noise analysis undertaken in the EIAR. You are requested to provide clarification and further information in relation to the following issues:

**1. Impact of Peak  $L_{Amax}$  Noise Levels from Air Traffic Movements (ATMs) on Sleep**

The assessment in the EIAR of the effects of noise from ATMs at night (2300 to 0700 hrs) is based on energy averaging noise metrics over relatively long periods e.g. 8 hrs, correlated with the percentage of the exposed population likely to self-report being highly sleep disturbed (%HSD), assessed with a standardised scale based on the guidance in the World Health Organisation's (WHO) Environmental Noise Guidelines 2018. (WHO ENG 2018)

However, aircraft noise is not experienced in an "average" fashion. It consists of periods of comparative quiet when there are no aircraft flying near or over a receptor interspersed with relatively short periods of noise when an aircraft approaches a receptor, builds to a peak at its closest approach and then decays as the aircraft moves away from a receptor.

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Ríomhphost	Email	bord@pleanala.ie

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The EIAR includes information on peak  $L_{Amax}$  noise levels from ATMs and the number of these events at night in terms of the N60, N65<sup>1</sup> noise contours for the 92 day summer average of ATMs and airport modes, and the N60 metric and  $L_{Amax}$ <sup>2</sup> for the single modes of airport operation. But these data are presented for information purposes only and there is no analysis of the effect of peak  $L_{Amax}$  noise levels from ATMs on additional awakenings at night regarding the baseline and consented scenarios.

You are requested to assess the probability of additional awakening due to the peak  $L_{A,8,Max}$  of ATMs at night between 2300 and 0700hrs for the 92 day summer average of ATMs and airport modes, and for the single modes of airport operation and for the likelihood of additional awakenings for the overall annual average number of ATMs at night, based on the approach described in the review supporting the WHO ENG 2018 (*Environmental Noise Guidelines for the European Region: A Systematic Review on Environmental Noise and the Effects on Sleep – International Journal of Environmental Research and Public Health*).

The Scenarios tested should include baseline conditions and the future operation of the airport proposed under the current application.

## 2. Sensitivity Testing of the Population Numbers Covered by the Noise Contour Predictions

The noise contour and population exposed data presented in the EIAR of predictions of future scenarios is based on assumptions on the number of ATMs and the fleet mix at the airport. Despite best endeavours to be precise, such assumptions are estimates based on forward projections that will inevitably introduce a degree of uncertainty into the prediction of future noise.

To better understand what the consequences of uncertainty in the input data might be, or at least the associated trends with such uncertainty on the area covered, and the population affected by the noise contours presented in the EIAR. You are requested to present further analysis by sensitivity testing of:

- (a) the noise contours,
- (b) the area covered and
- (c) crucially the number and type of sensitive receptors affected when assessed using the significance criteria in the EIAR, based on the assumption of +/- 1 dBA change in the predicted noise levels (crudely equivalent to an approximately 25% change in the area of the noise contours or all things being equal the number of ATMs used to calculate the noise contours).

## 3. Baseline years assumed in the assessment.

The EIAR states in relation to the choice of year 2018 as a baseline against which to compare future scenario, that;

- a. "Since the North Runway Planning Permission was granted, there has been rapid growth in passenger numbers, and the current runway infrastructure was already at capacity at peak times in 2018 and 2019."

And,

<sup>1</sup> N60 and N65 are metrics that indicate how many times in a night a peak noise level of 60 or 65 dBA  $L_{A,5,max}$  will be exceeded externally at a receptor. These values are equivalent to internal levels in bedroom with windows partially open for ventilation similar to the guideline value of  $L_{max}$  45 dBA which the WHO Community Noise Guidelines recommends should not be exceed more than 10 to 15 times a night in a bedroom.

<sup>2</sup> The maximum instantaneous A-weighted sound level during a measurement period e.g. single ATM approach towards, closest point to and movement away from a receptor.

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- b. *"The year 2018 was chosen as it was the most recent year with full activity data available when this relevant action assessment process commenced. It is also the first year of the 2018-2023 Dublin Airport Noise Action Plan."*

Based on the above it is presumed the annual and 92 day summer period numbers of ATMs were lower prior to 2018.

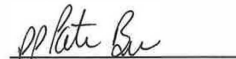
Consequently, you are requested to comment on why:

- a) the baseline figures for 2019 were not used for the purposes of analysis.
- b) When prior to 2018 were the annual and 92 day summer period numbers of ATMs last more than 25% below those in 2018, and
- c) If the numbers of ATMs were last more than 25% below those in 2018 after the Northern runway came into use, what would be the difference in terms of the number of dwellings and persons likely to experience an increase in  $L_{night}$  to over 50 dBA and 55 dBA compared to the numbers presented in the EIAR.

If the information required is not received before the end of the specified period, the Board will dismiss or otherwise determine the appeal without further notice to you in accordance with section 133 of the 2000 Act, (as amended). Your submission in response to this notice must be received by the Board not later than **5.30 p.m. on the date specified above**.

Please quote the above appeal reference number in any further correspondence.

Yours faithfully,



Garry Dorgan  
Executive Officer  
Direct Line: 01-8737152

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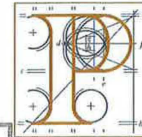
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**APPENDIX B: CLARIFICATION OF REQUEST FOR FURTHER INFORMATION, DATED 26<sup>th</sup> May 2023  
(ABP REF. PL06F.314485)**

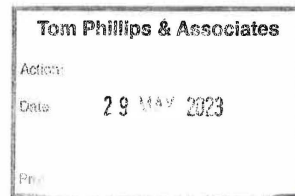
**Our Case Number:** ABP-314485-22

**Planning Authority Reference Number:** F20A/0668



An  
Bord  
Pleanála

Tom Phillips & Associates  
80 Harcourt Street  
Dublin 2  
D02 F449



**Date:** 26 May 2023

**Re:** A proposed development comprising the taking of a 'relevant action' only within the meaning of Section 34C of the Planning and Development Act 2000, as amended, which relates to the night-time use of the runway system at Dublin Airport  
Dublin Airport, Co. Dublin

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer to the Board's statutory notice to you dated 27th April, 2023 requesting additional information and your response received on 16th May, 2023.

It is noted from your response that you are requesting additional time in order to reply to respond to the information requested by the Board. Therefore, in accordance with section 132 of the Planning and Development Act, 2000 (as amended), you are required to submit, on or before 16 weeks from the date of this notice, e.g. by **14th September, 2023**, the information set out in the Board's notice dated 27th April, 2023 and the below clarifications:

**1. Regarding scenarios to be tested the following years are acceptable;**

- I. 2018,
- II. 2025 Permitted and,
- III. 2025 Proposed

**2. Regarding the clarity on the 25% of ATMs on the North Runway, request 3 (c) (i) has been rephrased as follows:**

- I. Assuming the fleet mix stays the same but the assumed numbers of ATMs at night are 25% below those in 2018, what would be the difference in terms of the a) number of dwellings and b) persons likely to experience an increase in Lnight to over 50 dBA and 55 dBA compared to the numbers presented in the EIAR.


If the above information, and the information requested by the Board on the 27th April, 2023 (enclosed), is not received before the end of the specified period, the Board will dismiss or otherwise determine the appeal without further notice to you in accordance with section 133 of the 2000 Act, (as amended). Your submission in response to this notice must be received by the Board not later than **5.30 p.m. on the date specified above.**

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APPENDIX C: REQUEST FOR CLARIFICATION & EXTENSION OF TIME, DATED 16<sup>th</sup> May 2023 (ABP REF. PL06F.314485)

 <b>TOM PHILLIPS</b> + ASSOCIATES PLANNING FOR THE FUTURE	80 Harcourt Street Dublin 2 D02 F449 t +353 1 478 6055	Also at: 437 & 455 No 1 Horgan's Quay Cork T23 PPT8	e info@tpa.ie w www.tpa.ie
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The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

Tuesday 16<sup>th</sup> May 2023  
[By Email]

Dear Sir/Madam,

**Re: ABP Ref. PL06F.314485 –Request for Reissue of Request for Further Information (RFI)**

I am writing on behalf of daa plc in order to seek that the Board reissue the invitation to provide information/clarification, dated 27<sup>th</sup> April 2023.

Given the nature and scale of work required to properly answer each of the items, along with the current capacity of the technical team, it is considered that the current period provided to prepare a response is insufficient.

In addition to the above, a number of items raised by the Board in their request require further clarification from the Board in order to adequately address each of the items requested. The clarifications required on each of these items is set out below.

**Rationale for Extension of RFI Response period for Item No. 1**

The overall rationale for this request is to enable our technical team to undertake the modelling required in order to address the requests included in Item 1.

At the very minimum this work requires modelling of the L<sub>AMAX</sub> noise level at each of the circa 400,000 receptors in the study area, for every different aircraft operation in the modelled scenarios. This involves considering each aircraft type and each route in turn.

The Project Team have outlined that this requires extensive additional modelling work to be undertaken.

In order to address this Item, we are seeking clarification on the following:

The request mentions the scenarios to test as “baseline conditions and the future operation of the airport under the current application”. We interpret that the following scenarios would satisfy this request:

- 2018
- 2025 Permitted

TOWN PLANNING CONSULTANTS

Directors: Tom Phillips BA MRUP MA (Urban Des) MRTPI FIP (Managing); Gavin Lawlor BSoc Sc MRUP MIP; Jerry Lucey BA (Hons) MBS (MIMAS) ACMA; John Gannon BSc (Surv) MRUP MIP; and Stephen Barrett BSc (Spatial Planning) Dip. ERM MIP. Associates: Aoife McCarthy BA (Hons) MRUP (Hons) MIP; Brian Minogue BSc (Spatial Planning Hons), MIP; Julie Costello BA MRUP MIP; Laura Finn BA(Hons)TP; Dip ERM, Dip EIA Mgmt, MIP; Lizzie Donnelly BA (Hons), MA (Planning), MRTPI MIP; Orla Casey BA (Hons) MPlan MIP; and Sine Kelly BAgrSc (Land Hort) MRUP Adv Dip PM MIP AMILL.  
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- 2025 Proposed

We would ask that the Board provide further clarification on this request and confirm if these interpretations are correct.

#### **Rationale for Extension of RFI Response period for Item No. 2**

In a similar way to the rationale outlined above, in order to comprehensively address the requests outlined in Item 2, extensive additional modelling work would need to be undertaken.

The Project Team consider that at minimum the work would involve re-processing of EIAR noise model outputs to produce the required outputs. Additionally, some models may need to be re-run to reflect the larger areas assessed in the scenarios with 1 dB added to the EIAR levels.

#### **Rationale for Extension of RFI Response period for Item No. 3**

In order to comprehensively address the issues raised as part of Item 3, it is considered that there is a lack of clarity surrounding item 3c), in particular the figure of 25% and reference to after the Northern runway came into use. Given this runway only came into use in August 2022 it has not been open for a complete 92-day summer period or a complete annual period. It is also not clear to the project team if the 25% relates to overall ATMs or just those occurring at night.

We therefore seek clarification on the exact nature of the item 3c) request.

#### **Request for Reissue of Request for Further Information**

For the reasons outlined above, I would be grateful if you could confirm receipt of this request and agreement that the Board will reissue the invitation to provide information/clarification with an updated response period of up to **16 weeks from the original due date of May 17<sup>th</sup>, 2023**, providing for an updated response date of on or before **5<sup>th</sup> September 2023**.

**It should be noted that the timeframes provided above are calculated based on receiving clarification on each of the items above within a period of 2 weeks, by 30<sup>th</sup> May 2023.**

Yours sincerely

Gavin Lawlor  
Director  
Tom Phillips + Associates