

Senior Executive Officer
Planning Department
Fingal County Council
County Hall
Swords
Co. Dublin
K67 X8Y2

13th September 2021
[By Hand]

Dear Sir/Madam,

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, at Dublin Airport, Co. Dublin, in the townlands of Collinstown, Toberbunny, Commons, Cloghran, Corballis, Coultry, Portmellick, Harristown, Shanganhill, Sandyhill, Huntstown, Pickardstown, Dunbro, Millhead, Kingstown, Barberstown, Forrest Great, Forrest Little and Rock on a site of c. 580 ha.

ADDITIONAL/FURTHER INFORMATION

FINGAL COUNTY COUNCIL REG. REF.: 20A/0668

DATE OF FURTHER INFORMATION REQUEST: 19/02/2021

1.0 INTRODUCTION

Tom Phillips + Associates ("TPA") continues to act on behalf of daa plc as part of a multi-disciplinary project team including AECOM, Bickerdike Allen Partners (BAP), Ricondo, Mott MacDonald, InterVISTAS and Anderson Acoustics. We have been requested to respond to a Request for Further Information (FI) issued in relation to the above planning application to Fingal County Council (FCC) for permission for a proposed Relevant Action within the meaning of Section 34C of the Planning and Development Act 2000 [as amended] at Dublin Airport.

In addition to FCC's request for FI, we note that the Aircraft Noise Competent Authority (ANCA) also issued a Direction (Direction 01) on 24th February 2021 seeking a series of information to be provided. Whilst separate to FCC's request for FI, in addressing ANCA's Direction 01 there has been a number of revisions to the supporting documentation submitted with the original application. There has also been a number of revisions to the material supporting the planning application as a result of FCC's own request for FI.

TOWN PLANNING CONSULTANTS



This letter provides an overview of the documents being submitted in response to both FCC's and ANCA's requests for FI.

These revisions primarily relate to the following:

- Preparation of a revised Environmental Impact Assessment Report (EIAR)
In response to FCC's request for FI a revised EIAR has been prepared and submitted with this response to FCC's request for FI. The attached revised EIAR prepared by AECOM and dated September 2021 supersedes the previous EIAR submitted with the application on 18th December 2020.
- Inclusion of additional assessment years as requested by FCC.
The request for FI by FCC includes a request for additional assessment years within the EIAR. These additional assessment years are provided in the attached revised EIAR and supporting information. For the avoidance of doubt the years 2022, 2025 and 2035 are included as assessment years in the EIAR.
- Clarification of the scenarios for assessment in the EIAR
The revised EIAR submitted as part of this response to FCC's request for FI clarifies the scenarios for assessment. In this regard, the following applies:
 - The Permitted scenario assumes that the North Runway becomes operational, but the airport is constrained by the restrictions on night-time use of the runway system at Dublin Airport, namely the restriction on the average number of flights permitted between the hours of 23:00 and 07:00 which limits the number of flights to an average of 65 between these hours and the restriction of the use of North Runway at night (no use between 23:00 and 07:00) (i.e. conditions no. 3(d) and no. 5). These conditions do not currently apply to Dublin Airport but would come into force once the North Runway becomes operational. The Permitted Scenario also assumes that the current 32 mppa Cap remains in place. Taken together, these characteristics mean that the Permitted Scenario represents the 'do nothing' case.
 - The Proposed scenario represents the situation with the proposed Relevant Action in place. It assumes that the North Runway becomes operational but the airport is not constrained by the restrictions on night-time use of the runway system at Dublin Airport, namely the restriction on the number of flights permitted between the hours of 23:00 and 07:00 which limits the number of flights to an average of 65 between these hours and the use of North Runway at night (i.e. conditions no. 3(d) and no. 5). Instead, the Proposed Scenario involves use of North Runway in the shoulder hours 06:00 to 07:00 and 23:00 to 00:00 and the introduction of a noise Quota Count System to replace the average of 65 night flights (as measured over the 92 day modelling period) restriction. The Proposed Scenario also assumes that the current 32 mppa Cap remains in place.
 - In a change to the modelled runway usage, the revised EIAR assumes that in 2025 and 2035 both parallel runways are used for departures in the 06:00 to 08:00 i.e. semi-mixed mode. For 2022, it is assumed that segregated mode is in use 06:00 to 08:00 (no change from December EIAR).
- Response to the latest passenger forecasts at Dublin Airport and update of Dublin Airport Operating Restrictions, Quantification of Impacts on Future Growth, Mott McDonald.



The September 2020 Dublin Airport Operating Restrictions analysis and report submitted with the application on 18th December 2020 was based on pre-Covid schedules and early views on the impact of Covid 19 and traffic recovery. The latest update to the passenger forecasts and Operating Restrictions Report (June 2021) is based on new daa forecasts and the latest base day schedules.

One key difference is that the latest forecast schedules have a smaller share of foreign airline traffic, which tend to operate during the 0700-2300 daytime hours. Most notably, a number of Airlines have exited the Dublin market due to financial difficulties / bankruptcies in the Covid crisis. As a consequence, the latest view of traffic recovery is more dependent on based-carrier flying by Aer Lingus and Ryanair, which require departure slots in the 0600-0700 period of the night and often last arrivals after 2300. This means that in the post-Covid recovery more traffic is now impacted by the 65/night limit and the annualised impact of the night operating restrictions are now calculated to be around 1.6m passengers in 2025 compared to 1.1m in 2025 in the previous forecast and Operating Restrictions Report.

- Dublin Airport Economic Impact of Operating Restrictions, Intervistas, June 2021.
The Economic Impact Report has been updated to take account of the revised forecasts and Impact of Operating Restrictions analysis.
- Regulation 598 Documentation
Revisions to the Cost Effectiveness Analysis and Technical report to reflect revisions to the Economic Impact Report analysis and revised scenario assessments.
- Preparation of an Appropriate Assessment Screening Report
An AA Screening report including responses to the items identified in FCC's RFI (Refer Below)

What follows is a detailed response to FCC's request for Further Information.

2.0 RESPONSE TO FURTHER INFORMATION REQUEST

2.1 Item 1 a)

To enable the planning authority to undertake an investigation and an analysis to reach as complete as assessment as possible of the direct and indirect effects on the environmental factors the applicant is requested to address the following in a revised Environmental Impact Assessment Report (EIAR):

a) While some information on the EIAR Project Team is provided at Section 1.1 0 of the EIAR, not all names or qualifications are provided and statements of experience demonstrating competency should be provided. Article 94(e) of the Regulations requires that an EIAR includes a list of names of all the experts contributing to the various sections of the report, together with details of their competency including, as appropriate, qualifications, statements of experience and any additional information that demonstrates the required competency.

Applicant's Response

A revised EIAR has been prepared and is submitted with this response to FCC's request for FI. Chapter 1 of the revised EIAR includes all the names and qualifications, including statements



of corporate experience and years' experience demonstrating competency for the individuals responsible for the preparation of the revised EIAR. This information is provided in accordance with Article 94(e) of the Planning and Development Regulations 2001 [as amended].

It is considered that Chapter 1 of the revised EIAR appropriately responds to item 1a) of the request for FI.

2.2 Item 1 b)

Given that both permitted and proposed scenarios involve constraints, e.g. either by time/number of flights in the permitted, or by time/ noise quota in the proposed. It should be clarified, as appropriate, the basis of the use of 'constrained' and 'unconstrained' in the EIAR and if these are simply 'as permitted' and 'as proposed' scenarios.

Applicant's Response

Section 1.7 of the revised EIAR describes the proposed Relevant Action which this application is subject to, including description of the scenarios assessed. The revised EIAR does not refer to 'constrained' and 'unconstrained' scenarios but instead refers to the 'permitted' and 'proposed' scenario for each assessment year for ease of reference. Refer to Chapter 1 of the revised EIAR for more information.

It is considered that the revised EIAR suitably responds to item 1 b) of the request for FI.

2.3 Item 1 c)

In order to gain a fuller understanding of the characteristics and likely significant impacts of the proposed changes over time, and in keeping with the requirements of Annex IV(S) of the EIA Directive and standard assessment practice, the assessments presented in the EIAR should also provide for a longer-term scenario (i.e. 10 or 15 years post opening year scenario (2022)).

Applicant's Response

The revised EIAR includes an assessment of the permitted and proposed scenarios for the following years:

- 2022: when North Runway is first expected to become 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 is first expected to be reached but not exceeded). This is also the first year of predicted maximum environmental effects in the Proposed Scenario; and
- 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)).

It is submitted that the revised EIAR and the assessment years used suitably respond to the requirements of Annex IV(5) of the EIA Directive. Further, it is considered that the revised EIAR suitably responds to item 1 c) of FCC's request for FI.



2.4 Item 1 d)

While not expressly stated in each and every chapter it is noted that by assessing the 'permitted' scenario in 2018, 2022 and 2025 that the Do-nothing scenario has been included. Likewise, it is noted chapters of the EIAR that the assessment includes for the 'worse-case' scenario (e.g. Chapters 7, 10, 13, 14). In the interests of clarity, the do nothing and 'worse-scenario' should be identified clearly and applied consistently throughout the assessment.

Applicant's Response

The revised EIAR includes a *Key Concepts & Terminology* in the Introductory section of the revised EIAR. The *Key Concepts & Terminology* sets out the definitions of the relevant terms used in the assessment of each scenario as well as clarification of the relevant terms used in describing the scenarios assessed. For the avoidance of doubt, the revised EIAR does not refer to the 'Do-nothing scenario' or the 'worse-case scenario' as the scenarios assessed as part of the revised EIAR, however the Permitted Scenario assessed in the revised EIAR represents the 'do-nothing' scenario i.e. that which will pertain in future if the proposed Relevant Action is not consented and conditions 3(d) and 5 of the North Runway Planning Permission come into effect.

It is submitted that the revised EIAR suitably responds to item 1 d) of FCC's request for FI.

2.5 Item 1 e)

The submitted planning documentation and supporting Environmental Impact Assessment Report (EIAR) does not sufficiently acknowledge the North Runway's capacity, as permitted, to deliver a gain in connectivity. As a result, it is considered that further consideration is required of the 'baseline scenario' (i.e. as referred to in the EIAR the future permitted baseline (2022 constrained)). The assessment should give further consideration to alternatives that operate within permitted take-off and landing hours and demonstrate how they are interact with permissions and conditions at Dublin Airport regarding the 32mppa limit, over a longer timeframe (i.e. 10 or 15 years post 2022).

Applicant's Response

The revised EIAR includes a Permitted Scenario as well as a Proposed Scenario, to contrast the effects of the North Runway's capacity, as permitted, with that of the proposed Relevant Action in each of the Assessment Years, 2022, 2025 and 2035. Additionally, it is noted that various alternatives were considered in developing the proposed Relevant Action. The revised EIAR presents details of these in Chapter 4: Alternatives.

It is submitted that the revised EIAR suitably and revised planning documentation responds to item 1 e) of FCC's request for FI.

2.6 Item 1 f)

While details of consultations are outlined out in Chapter 5 of the EIAR, there is little information on the timings of the various consultations and no information has been provided in relation to the issues raised in the consultations and how these have informed the assessments in the EIAR. Information should be provided on timings of consultations, issues arising and how these have informed / been assessed in the EIAR.



Applicant's Response

The revised EIAR includes a revised *Chapter 5 – Consultation* which outlines the timings of the various consultations, the issues raised, as well as how the issues raised have informed the assessments in the EIAR. In this regard it should be noted that consultation was undertaken by daa in 2016 which made clear that daa would seek changes on condition 3(d) and 5 of the North Runway Planning Permission. A key outcome of this consultation informed the current application for the proposed Relevant Action, in that it does not seek unrestricted use of the runway system as was envisaged 2016, but proposes to amend and replace the current operating restrictions. Furthermore, the revised EIAR has considered each of the submissions and observations received to the application during the 5 week statutory planning period. A summary of this consideration is set out in the revised EIAR. Refer to *Chapter 5 – Consultation* of the revised EIAR.

It is submitted that Chapter 5 of the revised EIAR suitably responds to item 1 f) of FCC's request for FI.

2.7 Item 1 g)

Section 6.4 Local Planning does not address land use zoning in the wider area around the airport, areas which may be potentially impacted by the proposed Relevant Action. Likewise, potential impact on wider land use zoning is not considered under Chapter 19 Material Assets. Existing land use and land use zonings around the airport should be described under local planning policy and described and assessed for potential impacts under Chapter 19 Material Assets.

Applicant's Response

Following consideration by the EIAR Project Team it is considered that the above referenced item is best addressed in *Chapter 6 – Planning, Development Context and Land Use Zoning*, rather than in both Chapter 6 and *Chapter 19 – Material Assets* as the potential impacts relate to impacts on land use zoning and any impacts on the ability of the policy objectives within the relevant County Development Plans to be achieved. The revised EIAR includes a revised Chapter 6 which includes a review and discussion of the Land Use Zoning surrounding the airport and the wider area. An assessment of the potential impacts to existing Land Use Zoning is included having regard to the current policy provisions of the County Development Plan. This is based on the potential for the proposed Relevant Action to impact on the achievement of the policies and objectives set out for the land use zonings surrounding the airport. The assessment concludes that the existing policy environment relating to the airport and the surrounding lands will continue to operate sufficiently and is considered suitable to achieve the required outcomes sought by the County Development Plan.

It is submitted that Chapter 6 of the revised EIAR suitably responds to item 1 g) of FCC's request for FI.



2.8 Item 1 h)

The assessment at Section 7.7 of Chapter 7 Population and Human Health should initially present the findings of the unmitigated scenario to allow for a full assessment of potential worse-case scenario. The effect of mitigation measures on the impacted environment should be presented separately, followed by a clear and definitive discussion on any residual impacts, associated locations, characteristics, effects etc. Any revised assessment presented in Chapter 7 should have regard to any further review or update required of other chapters of the EIAR, e.g. ground noise assessment.

Applicant's Response

Chapter 7 Population and Human Health presents the findings of the unmitigated scenario (an assessment before mitigation) and presents a discussion of residual impacts. The chapter is fully updated to reflect the rest of the revised EIAR.

It is submitted that Chapter 7 of the revised EIAR suitably responds to item 1 h) of FCC's request for FI.

2.9 Item 1 i)

The assessment presented in Chapter 14 Ground Noise and Vibration should be revised to include:

- *A longer-term assessment scenario (i.e. 10 or 15 years post 2022) to allow for a full understanding of the medium and long-term characteristics and significance of impacts. To allow for consideration of impact on potentially worse affected locations, the impact assessment should also include properties closest to the airport.*
- *Chapter 9 Traffic and Transport identifies changes to traffic levels and, therefore, traffic should be included in the revised ground noise assessment.*
- *Ground Noise Modelling Figures referenced as being included in Appendix 14, section 14C.4.1, in Technical Appendices Volume 1 have not been included. These should be updated as required and submitted.*
- *A cumulative assessment of the interaction between ground and air noise, calculating quantitatively the numbers of persons "highly annoyed" or "Highly Sleep Disturbed" by both Ground and Air Noise. The assessment should explain the relative contribution to noise annoyance and sleep disturbance by ground and air noise. The combined noise impacts should be also shown by means of maps.*



Applicant's Response

The Ground Noise and Vibration chapter of the revised EIA include assessments in the years 2022, 2025 and 2035. Road traffic noise impacts have been included in the assessments presented. All technical appendices have been fully updated and included in the submission. A cumulative assessment of air and ground noise impacts is also provided.

An assessment of the number of people highly annoyed and highly sleep disturbed has been carried out using the dose response relationships given in the WHO Environmental Noise Guidelines (2018) for air noise and road traffic noise separately, as endorsed by EU Directive 2020/367. A comparable dose response relationship for aircraft ground noise is not available and so this has not been assessed.

It is submitted that Chapter 9 of the revised EIA suitably responds to item 1 i) of FCC's request for FI.

2.10 Item 1 j)

Directive 2014/52/EU requires the consideration of the likely significant effects of the project on climate and also the vulnerability of the project to climate change. Further information is required to demonstrate sufficiency of information with regard to this environmental factor. Further consideration should be given to impacts regarding two key aspects to be addressed, 1) climate change mitigation and 2) climate change adaptation.

Applicant's Response

The climate and carbon assessment rules out the requirement to assess climate change adaptation further, as explained in the revised EIA, because the proposed Relevant Action only affects the operational use of the North Runway and does not propose any physical changes to infrastructure that could be affected by future climate change and thus require mitigation to adapt to such changes. The Relevant Action is not vulnerable to climate change. In terms of climate change mitigation, the assessment has been revised to address the impacts of the Permitted Scenario as well as the Proposed Scenario.

It is submitted that Chapter 11 of the revised EIA suitably responds to item 1 j) of FCC's request for FI.

2.11 Item 1 k)

Chapter 20 Cultural Heritage does not detail the cultural heritage baseline, the designated and non-designated heritage assets or archaeological investigations on the basis that the proposed amendments will not result in any effects upon cultural heritage assets when compared with the permitted/constrained scenario. A table of the designated archaeological and architectural heritage sites protected by statutory legislation should be included within the EIA.

Applicant's Response

A table of the designated archaeological and architectural heritage sites protected by statutory legislation is included in the revised EIA in Chapter 20, Cultural Heritage.

It is submitted that Chapter 20 of the revised EIA suitably responds to item 1 k) of FCC's request for FI.



2.12 Item 1 l)

Chapter 21 includes references to 'in-combination effects' throughout (e.g. Section 21.5 In-combination Effects). In-combination is not an EIA term, and the assessment presented in Section 21.5 does not adequately address, consider or assess impacts as set out in the EIA Directive, legislation, and EIA guidance. The assessment in the EIAR should address, consider and assess, where required, impacts which may arise from 'interactions' between environmental factors, e.g. noise and health, noise and population, noise and biodiversity, noise and materials assets (land use), etc. In addition, the assessment of potential cumulative impacts should be reviewed and updated to consider specifically planned or permitted projects, or land use zonings (community, residential, etc.) within the zone of influence of the Relevant Action. Table 21-1 should be reviewed and expanded as necessary, to address all potential cumulative impacts and the assessment updated accordingly.

Applicant's Response

'In-combination' is an EIA term commonly used by practitioners to describe the assessment impacts which may arise from 'interactions' between environmental factors. However, it is acknowledged that other terms are often used as well, and the revised EIAR now aligns with the terminology used in the Environmental Protection Agency's draft guidance on EIA.

The revised chapter includes an assessment of the interactions between the factors identified in the Directive, presenting evidence to demonstrate that there are none.

It is submitted that Chapter 21 of the revised EIAR suitably responds to item 1 l) of FCC's request for FI.

2.13 Item 1 m)

A summary table of features and/or measures envisaged to avoid, prevent or reduce and, if possible, off set likely significant effects of the proposed development, and a timescale for the implementation of proposed mitigation measures.

Applicant's Response

An additional chapter summarising these matters as outlined above has been included in the revised EIAR. This is Chapter 23 of the revised EIAR, which includes a summary of the assessment of effects in each chapter, mitigation measures proposed to offset adverse effects (including mitigation which forms an inherent part of the proposed Relevant Action) and describes the residual effects. Timescales for implementation are also set out.

It is submitted that Chapter 23 of the revised EIAR suitably responds to item 1 m) of FCC's request for FI.

2.14 Item 1 n)

It is considered that the EIAR Non-Technical Summary (NTS) is overly simplified and fails to adequately set out the receiving environment, the assessment of potential impacts, proposed mitigation measures and residual impacts, as required of the EIA Directive and Guidance including EC EIA Guidance - EIAR, 2017. The NTS for the EIAR should be reviewed and updated to provide appropriate and sufficient detail to describe the receiving baseline environment, to



detail the assessment of potential impacts, to outline the nature and effect of proposed mitigation measures and to define residual impacts in a non-technical manner.

Applicant's Response

The Non-Technical Summary has been re-written to respond to the information request and better reflect the content of the revised EIAR, more fully describing the receiving environment for the relevant environmental factors and including the complete set of mitigation measures.

It is submitted that the NTS of the revised EIAR suitably responds to item 1 n) of FCC's request for FI.

2.15 Item 2 a)

Further information is required in relation to AA screening report, as follows: Section 2.1.5 of the AA Screening report, potential direct effects on any SACs are explicitly ruled out. The EIAR, in several places (such as at Sections 12_.3.1,12.5; 15.4 and 16.3), states that the Cuckoo Stream flows west to east through the application site. At Section 19.3.2.4 it is noted that the Forrest Little, Wad and Kealy's Streams also flow through the application site. The Cuckoo Stream eventually joins the Mayne River, and the other streams eventually join the Sluice River. Both of these rivers flow into Baldoyle Bay SAC/ SPA and not Malahide Estuary. The screening report should be updated to correctly identify all surface water pathways.

Applicant's Response

The AA Screening Report has been corrected to identify the features noted and further to explain why, in the light of the above, the assessments in the original Screening Report remain correct. This AA Screening concludes that, on the basis of objective information, likely significant effects on European sites from the proposed Relevant Action, both individually and in-combination with other plans and projects, can be excluded. There is no requirement to proceed to the next step of Appropriate Assessment and, subject to other requirements, the proposed Relevant Action can be authorised.

It is submitted that AA Screening report now submitted suitably responds to item 2 a) of FCC's request for FI.

2.16 Item 2 b)

The AA Screening report should be revised to take account of statements within Chapter 8 of the EIAR regarding potential impacts on European-sites caused by emergency fuel dumping from the Relevant Action application, should this take place.

Applicant's Response

The AA Screening Report has been revised as requested above. It is noted that emergency fuel dumping has only happened once since 2014 and that no effects on European sites are identified.

It is submitted that AA Screening report now submitted suitably responds to item 2 b) of FCC's request for FI.



2.17 Item 2 c)

The review of in-combination effects should be reviewed, and updated if necessary, to take account of the responses submitted to this request for further information in relation to both the Screening for Appropriate Assessment and Environmental Impact Assessment Report.

Applicant's Response

In-combination effects have been reviewed and updated to reflect the revised content of the EIAR and AA Screening Report.

It is submitted that AA Screening report now submitted suitably responds to item 2 c) of FCC's request for FI.

2.18 Item 3 - Applicant's Response

In the interest of ensuring accuracy of the particulars submitted with the planning application for the public file, the applicant is requested to address the following:

a) Correct the planning register references where typographical errors have been made in respect to the submitted Environmental Impact Assessment Report, as prepared by AECOM and Planning Report, as prepared by Tom Phillips and Associates. For clarity, an incorrect reference to An Bord Pleanála planning file number is repeated. The reference is to amended permission (FCC Reg. Ref. No.: F19A/0023) ABP Ref. No. ABP-305298-19, which is incorrectly listed as ABP-305289-19. Furthermore, an incorrect Register Reference in respect to the Terminal 2 permission FCC Reg. Ref. No. F06N1248, which is incorrectly listed as F04A/1755.

b) Amend the number of incorrect cross-references to other sections of a chapter and/or other chapters. Incorrect references noted as 'section O' are prominent in Chapters 7, 13 and 14.

Applicant's Response

Item 3 a) and 3 b) of FCC's request for FI relates to a typographical errors and incorrect cross-references in the documents submitted with the application. All relevant documents have been updated and errors corrected.

It is submitted that documents contained with this RFI submission suitably respond to items 3 a) and b) of FCC's request for FI.

3.0 ANCA DIRECTION 01

In addition to FCC's request for FI it is noted that ANCA issued a Direction requiring the submission of further information on 24th February 2021. Response to ANCA's requests have been prepared and submitted in a number of separate tranches on the following dates:

- 4th June 2021 – Tranche 1;
- 11th June 2021 – Tranche 2;
- 18th June 2021 – Tranche 3;
- 23rd July 2021 – Tranche 4;
- 30th July 2021 – Tranche 5; and
- 27th August 2021 – Tranche 6.



In accordance with Section 34C(3)(b) of the Planning and Development Act 2000 [as amended], copies of the above referenced tranches of information were provided to FCC on the above referenced dates or shortly afterwards. For the avoidance of doubt and clarity, full and final electronic and hard copies of the full package of ANCA submissions are also attached to this submission and listed in section 4.0 below.

4.0 DOCUMENTS SUBMITTED WITH THIS FURTHER INFORMATION RESPONSE

In support of the above referenced response and as outlined in Part 1.0 of this submission a number of documents originally submitted with this application have been revised. These revisions have been made in part to respond to FCC's request for FI and also as a result of the information provided in response to ANCA's Direction 01.

Where revised documents have been submitted, they supersede the previous version on the Planning Authorities File.

The following documents are attached to this submission:

PLANNING DOCUMENTS

- 10 No. copies of the Planning Report, prepared by Tom Phillips + Associates, dated September 2021.

Revised EIAR & AA SCREENING

- 10 No. copies of *Dublin Airport North Runway Relevant Action Application – Appropriate Assessment Screening* prepared by AECOM, dated September 2021;
- 10 No. copies of *Dublin Airport North Runway Relevant Action Application – Revised Environmental Impact Assessment Report (EIAR)*, prepared by AECOM, dated September 2021;
- 10 No. copies of *Dublin Airport North Runway Relevant Action Application – Revised EIAR Appendices*

In addition to the above referenced 10 No. hard copies, 1 No. electronic copy of the Revised EIAR & Revised EIAR Appendices has been submitted with the application in accordance with Article 97(1) of the Planning and Development Regulations 2001, as amended. This is Included on the USB containing an electronic copy of the response to FCC's Further Information request.

ANCA DOCUMENTS – 598 ASSESSMENT

- 10 No. copies of the response to ANCA's Direction 01 which includes the following documents:
 - o *Response to ANCA Direction 01 in relation to planning application F20A/0668, Aecom, September 2021 (2 No. Hard copies¹)*. It is noted that the Appendices included with this report contains an updated version of:
 - *Dublin Airport, Night Quota System Proposal (Report)*, prepared by Anderson Acoustics

¹ as agreed with the Mr. David Murray from the Planning Authority and ANCA in accordance with Article 22(3) of the Planning and Development Regulations 2001, as amended.



- A Technical Report 'A11267_19_RP035_4.0 NOISE INFORMATION – ANCA REQUEST FEBRUARY 2021', prepared by Bickerdike Allen Partners. This report details the scenarios requested by ANCA, summarises the results, and details how the noise modelling was undertaken including a summary of the forecasts. Note: 2 No. Hard copies of the Figures appended to this report are provided¹;
 - Revised Regulation 598/2014 Assessment which Includes the following:
 - 'Dublin Airport North Runway Relevant Action Application, Regulation 598/2014 (Aircraft Noise Regulation) Assessment Non-Technical Summary';
 - 'Dublin Airport North Runway, Regulation 598/2014 (Aircraft Noise Regulation) Forecast Without New Measures and Additional Measures Assessment Report' (Revision 2 – September 2021) Ricondo and Associates Inc;
 - 'Dublin Airport North Runway, Regulation 598/2014 (Aircraft Noise Regulation) Cost Effectiveness Analysis Report' (Revision 2 – September 2021) Ricondo and Associates Inc;
- 1 No. Electronic copy¹ of the following (Refer to USB folder: 3. ANCA DOCUMENTS):
- Modelled Aircraft Noise Levels/Grid Files in Electronic Format for the years 2022, 2025, 2030, 2035 and 2040, prepared by Bickerdike Allen Partners LLP;
 - Figures displaying plots of the noise contours on Ordnance mapping for the years, 2022, 2025, 2030, 2035 and 2040. Shapefiles of the noise contours are also provided;
 - ANCA Reporting Template v5.0 – Completed (excel file), prepared by Bickerdike Allen Partners LLP. This electronic file is Included on the USB containing an electronic copy of the planning application documents;
 - ANCA Reporting Template 2021 Update – 2016 END (excel file), prepared by Bickerdike Allen Partners LLP. This electronic file is Included on the USB containing an electronic copy of the planning application documents; and
 - A11267_19_CA437_2.0 Summary of Results Including Mitigation Excel Sheet.

5.0 CONCLUSION

In conclusion, it is submitted that the enclosed information addresses the request for FI in full and we trust that the Planning Authority will find the enclosed information to be in order.

It is noted that this submission is accompanied by a revised Environmental Impact Assessment Report. Notwithstanding this, we wish to highlight the application relates to a proposed Relevant Action only, comprising a change in operating restrictions, and will involve no construction works or changes to the consented physical infrastructure of the North Runway. Therefore, the proposed Relevant Action is not a project within the meaning of the EIA Directive.

On the basis of the case law of the Court of Justice of the European Union (CJEU), and, in particular, the Judgments in the Brussels Airport Case (Case C-275/09) and Pro-Braine (Case C-121/11), this application to remove, replace or vary Conditions No. 3(d) and No 5 of the North Runway permission is not an application for development consent for a 'project' within the meaning of the EIA Directive, and is therefore outside the scope of that Directive. Strictly without prejudice to that position, daa is submitting a Revised EIAR with this submission out of an abundance of caution.



Please do not hesitate to contact me with any queries that may arise in relation to this submission.

Yours sincerely



Gavin Lawlor
Director
Tom Phillips + Associates