

**FINGAL COUNTY COUNCIL
CHIEF EXECUTIVES REPORT
DRAFT DUBLIN AIRPORT LOCAL AREA PLAN**

20th November 2019

25
BLIANA
YEARS

**Comhairle Contae
Fhine Gall**
Fingal County
Council



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1.0 Introduction

The purpose of this Chief Executive's Report is to report on and provide a summary of the written submissions received in relation to the draft Dublin Airport Local Area Plan (the draft LAP), to respond to the submissions made during the consultation period and to make recommendations to the Elected Members on the issues raised.

On 3rd September 2019 Fingal County Council (FCC) published notice that it had prepared a draft LAP for Dublin Airport, pursuant to Section 20 of the Planning and Development Act 2000 (as amended).

The draft LAP sets out a land use planning framework to provide for the sustainable growth of Dublin Airport over the life of the LAP (2020-2026). The draft LAP includes a SEA Environmental Report, Screening Report for Appropriate Assessment and Strategic Flood Risk Management Plan and Surface Water Management Plan.

This report outlines a summary of the public consultation process, provides a categorisation and summary of issues raised in submissions, sets out a summary of recommendations and an overall recommendation relating to the CE Report and draft Dublin Airport Local Area Plan.

Note that editorial changes and updating of the draft Dublin Airport Local Area Plan will be carried out and minor typographical or graphical errors or discrepancies will be amended.

2.0 Public Consultation Process

2.1 Outline of Public Consultation Process

In accordance with Section 20 of the Planning and Development Act 2000 (as amended) the draft LAP was placed on public display from Tuesday 3rd September 2019 to Tuesday 15th October at Fingal County Council Offices at County Hall, Main Street, Swords, Co. Dublin, at Fingal County Council Civic Offices, Grove Road, Blanchardstown, Dublin 15 and Fingal County Council's Offices, George's Square, Balbriggan, Co. Dublin, and in Fingal Branch Libraries and on the Fingal County Council on line consultation portal <https://consult.fingal.ie/en/consultation/draft-dublin-airport-local-area-plan>

During the public consultation period the draft LAP and associated documents were disseminated to the public and submissions were invited as follows:

- Notification of the preparation and display of the draft LAP, including SEA Environmental Report and Screening Report for AA and Strategic Flood Risk and Surface Water Management Plan [SFRASWMP], for the purpose of public consultation were placed in the Irish Times, the Irish Independent and the Fingal Independent on the 3rd September 2019 together with information on the public consultation programme and an invitation for submissions.
- Letters that provided notification of the draft LAP and an invitation for submissions were circulated to, inter alia, the Minister for Housing, Planning and Local Government and relevant prescribed authorities.
- Public information displays of the draft LAP and associated documents were placed in Fingal County Council Offices in Swords, Blanchardstown and Balbriggan and in Fingal Branch Libraries and on the Fingal County Council on line consultation portal.
- Members of the public and other interested groups were invited to attend drop-in public information sessions regarding the content of the draft LAP held on Wednesday 18th September at FCC, County Hall, Swords and on Tuesday 1st October 2019 at Radisson Blu Hotel, Dublin Airport.
- A social media campaign took place during the public consultation period advising of the draft LAP and public consultation process.
- Notification of the draft LAP consultation programme and an invitation for submissions distributed to the Public Participation Network (PPN) Co-Ordinator.
- A briefing for Elected Members was held on September 18th 2019.

Prior to the preparation of the draft LAP, Fingal County Council undertook a number of forms of public consultation. This included publication of a strategic issues paper and the launch of an innovative new portal <https://yourairportviews.fingal.ie> to allow people to share views, aspirations and visions on how they would like to see the Dublin Airport LAP area develop into the future. The portal was developed to enhance traditional public consultation techniques through an open process with the aim of representing a full range of public opinion focused on inclusion and diversity of views.

The views shared in the issues paper submissions were combined with those received on yourairportviews.fingal.ie to ensure all relevant comments on the future of Dublin Airport were considered. Following this, stakeholders were invited to engage in a new type of follow up survey regarding the views submitted. The survey used a ranking system to establish an individual's priorities on the issues raised. Using this method, four distinct social perspectives emerged on the future of Dublin Airport which provide information on shared perspectives between all stakeholders. The method also identified views relating to the perspectives on which there was most agreement and disagreement. The four distinct shared perspectives that emerged are: Maximise Opportunity (focused on the value of the Airport), Protect and Engage (focused on the need to engage with and protect communities from noise), Night Restrictions (focused on night flights and climate), and Climate Action (focused on the implications of climate change).

The findings of the public consultation have been used to guide the preparation of this draft LAP and were used to guide and support further public consultation in relation to the draft LAP. This included inviting those who took part in surveys to attend a follow up meeting as part of the public consultation process to address outstanding issues raised in the consultation which could not be addressed in the draft LAP.

2.2 Outcome of Public Consultation

A total of 174 submissions were received during the consultation period. All submissions have been considered. Some submissions received included issues not relevant to the scope of the draft LAP and cannot be addressed in the Chief Executive's report. Listed in Table No. 1 are the submissions received including the name of the person or organisation making the submission and its allocated identification number along with a link to the submission.

Table 1: List of Valid Submissions Received

Author	Submission No.	URL
Michelangelo Gelardi	FIN-C239-1	https://consult.fingal.ie/en/submission/fin-c239-1/observation/noise-planes
Damien Flood	FIN-C239-2	https://consult.fingal.ie/en/submission/fin-c239-2/observation/extremely-noisy-due-extension
Swords Tidy Towns	FIN-C239-3	https://consult.fingal.ie/en/submission/fin-c239-3/observation/draft-dublin-airport-lap
Department of Culture, Heritage & the Gaeltacht	FIN-C239-4	https://consult.fingal.ie/en/submission/fin-c239-4/observation/draft-dublin-airport-lap
Meath County Council Planning Department	FIN-C239-5	https://consult.fingal.ie/en/submission/fin-c239-5/observation/meath-county-council-planning-department-submission
Annette Cashell	FIN-C239-6	https://consult.fingal.ie/en/submission/fin-c239-6/observation/dublin-airport-noise
Niamh Watson	FIN-C239-7	https://consult.fingal.ie/en/submission/fin-c239-7/observation/draft-dublin-airport-lap
Aidan Killen	FIN-C239-8	https://consult.fingal.ie/en/submission/fin-c239-8/observation/night-time-flights-noise-pollution
Claire Gubbins	FIN-C239-9	https://consult.fingal.ie/en/submission/fin-c239-9/observation/no-extension-night-flights-or-noise-zones-should-be-given-comply
Conor Kennedy	FIN-C239-10	https://consult.fingal.ie/en/submission/fin-c239-10/observation/night-time-noise-flights-align-draft-plan-who-recommendations
Regina Connolly	FIN-C239-11	https://consult.fingal.ie/en/submission/fin-c239-11/observation/noise-level-not-acceptable-and-makes-it-impossible-sleep
Marie Murphy	FIN-C239-12	https://consult.fingal.ie/en/submission/fin-c239-12/observation/unacceptable-noise-levels-solution
Ross McCann	FIN-C239-13	https://consult.fingal.ie/en/submission/fin-c239-13/observation/night-time-flights-impact-community-and-environment
John Chalkley	FIN-C239-14	https://consult.fingal.ie/en/submission/fin-c239-14/observation/dublin-airport-new-runway
Tanja Pettersson	FIN-C239-15	https://consult.fingal.ie/en/submission/fin-c239-15/observation/night-time-flights
Lorna Loftus	FIN-C239-16	https://consult.fingal.ie/en/submission/fin-c239-16/observation/grave-concern-re-night-time-noise-health-wellbeing
Richard Corcoran	FIN-C239-17	https://consult.fingal.ie/en/submission/fin-c239-17/observation/draft-dublin-airport-local-area-plan-or-dublin-airport-night-time

Deborah Ward	FIN-C239-18	https://consult.fingal.ie/en/submission/fin-c239-18/observation/dublin-airport-night-time-flights
Fiona Dowling	FIN-C239-19	https://consult.fingal.ie/en/submission/fin-c239-19/observation/dublin-airport-night-time-flights
Deborah O'Boyle	FIN-C239-20	https://consult.fingal.ie/en/submission/fin-c239-20/observation/night-time-flights-and-noise-pollution
Liam O'Connor	FIN-C239-21	https://consult.fingal.ie/en/submission/fin-c239-21/observation/aircraft-night-time-noise-pollution
Martin O'Brien	FIN-C239-22	https://consult.fingal.ie/en/submission/fin-c239-22/observation/health-families
Andrew Dunne	FIN-C239-23	https://consult.fingal.ie/en/submission/fin-c239-23/observation/night-time-noise-getting-worse
Michelle Walsh	FIN-C239-24	https://consult.fingal.ie/en/submission/fin-c239-24/observation/night-time-noise-flights
Robert Beckett	FIN-C239-25	https://consult.fingal.ie/en/submission/fin-c239-25/observation/night-time-flights-dublin-airport-and-associated-health-risks
David Curran	FIN-C239-26	https://consult.fingal.ie/en/submission/fin-c239-26/observation/worried-about-night-noise
Gearóid Fitzgerald	FIN-C239-27	https://consult.fingal.ie/en/submission/fin-c239-27/observation/night-time-flights
Annette McInerney	FIN-C239-28	https://consult.fingal.ie/en/submission/fin-c239-28/observation/noise-pollution-and-increase-night-time-flights
Owen McAllister	FIN-C239-29	https://consult.fingal.ie/en/submission/fin-c239-29/observation/concerns-about-noise-pollution
Caroline Murphy	FIN-C239-30	https://consult.fingal.ie/en/submission/fin-c239-30/observation/restricted-flights
Chris Dunne	FIN-C239-31	https://consult.fingal.ie/en/submission/fin-c239-31/observation/night-time-noise
Lanesborough Residents Association	FIN-C239-32	https://consult.fingal.ie/en/submission/fin-c239-32/observation/who-regulates
Keith Murray	FIN-C239-33	https://consult.fingal.ie/en/submission/fin-c239-33/observation/sky-night
Department of Education and Skills	FIN-C239-34	https://consult.fingal.ie/en/submission/fin-c239-34/observation/draft-dublin-airport-lap
Laura Walsh	FIN-C239-35	https://consult.fingal.ie/en/submission/fin-c239-35/observation/dublin-airport-night-time-flights
Orla Fox	FIN-C239-36	https://consult.fingal.ie/en/submission/fin-c239-36/observation/health-and-well-being-local-residents
Paul Gibson	FIN-C239-37	https://consult.fingal.ie/en/submission/fin-c239-37/observation/night-time-noise-worsening

Rita McCartan	FIN-C239-38	https://consult.fingal.ie/en/submission/fin-c239-38/observation/night-time-flights
J Gilmour	FIN-C239-39	https://consult.fingal.ie/en/submission/fin-c239-39/observation/night-time-noise-airport
James O'Flaherty	FIN-C239-40	https://consult.fingal.ie/en/submission/fin-c239-40/observation/i-do-not-want-more-flights-will-interrupt-my-families-sleep-i
Terri Jones	FIN-C239-41	https://consult.fingal.ie/en/submission/fin-c239-41/observation/aircraft-noise
Angela Lawton	FIN-C239-42	https://consult.fingal.ie/en/submission/fin-c239-42/observation/draft-dublin-airport-lap
C Donoghue	FIN-C239-43	https://consult.fingal.ie/en/submission/fin-c239-43/observation/opposition-proposed-increase-volume-night-flights-65-100
Bryan Johnston	FIN-C239-44	https://consult.fingal.ie/en/submission/fin-c239-44/observation/night-time-airplane-noise-extremely-disruptive
Garvan Quish	FIN-C239-45	https://consult.fingal.ie/en/submission/fin-c239-45/observation/night-time-flight-noise
Anne-Marie Fox	FIN-C239-46	https://consult.fingal.ie/en/submission/fin-c239-46/observation/dublin-airport-night-time-noise
Neil Cashell	FIN-C239-47	https://consult.fingal.ie/en/submission/fin-c239-47/observation/dublin-airport-noise
Margaret O' Leary	FIN-C239-48	https://consult.fingal.ie/en/submission/fin-c239-48/observation/night-flights-noise
Henry Prestage	FIN-C239-49	https://consult.fingal.ie/en/submission/fin-c239-49/observation/no-additional-night-flights-please
Jennifer Noirant	FIN-C239-50	https://consult.fingal.ie/en/submission/fin-c239-50/observation/night-flights-noise-getting-worse
Luka Abramovich	FIN-C239-51	https://consult.fingal.ie/en/submission/fin-draft-13726/observation/do-not-amend-two-conditions-night-flights-and-charge
Christophe Noirant	FIN-C239-52	https://consult.fingal.ie/en/submission/fin-c239-52/observation/noise-night-flights-has-already-gotten-worse
Maurice Cashell	FIN-C239-53	https://consult.fingal.ie/en/submission/fin-c239-53/observation/ban-or-restrict-night-time-flights
Una O'Riordan	FIN-C239-54	https://consult.fingal.ie/en/submission/fin-c239-54/observation/night-time-flights-are-huge-problem
Dermot Lane	FIN-C239-55	https://consult.fingal.ie/en/submission/fin-c239-55/observation/no-new-runway
Micheal Ryan	FIN-C239-56	https://consult.fingal.ie/en/submission/fin-c239-56/observation/dublin-airport-noise
William Hawkins	FIN-C239-57	https://consult.fingal.ie/en/submission/fin-c239-57/observation/we-support-opposition-expressed-against-

		daa-attempt-change
David Walshe	FIN-C239-58	https://consult.fingal.ie/en/submission/fin-c239-58/observation/night-time-flight-ban
Sean O'Shea	FIN-C239-59	https://consult.fingal.ie/en/submission/fin-c239-59/observation/night-time-flight-restrictions-are-essential
James Byrne	FIN-C239-60	https://consult.fingal.ie/en/submission/fin-c239-60/observation/observations-draft-dublin-airport-lap
Marie McMahon	FIN-C239-61	https://consult.fingal.ie/en/submission/fin-c239-61/observation/additional-noise-pollution
Elizaveta McGovern	FIN-C239-62	https://consult.fingal.ie/en/submission/fin-c239-62/observation/noise-pollution-already-unbearable
Ronan Cashell	FIN-C239-63	https://consult.fingal.ie/en/submission/fin-c239-63/observation/environmental-cost-plan
Liam Gorman	FIN-C239-64	https://consult.fingal.ie/en/submission/fin-c239-64/observation/lack-oversight-noise-pollution-dublin-airport
Joe Newman	FIN-C239-65	https://consult.fingal.ie/en/submission/fin-c239-65/observation/night-time-flying-and-conditions-attached-planning-permission
Beverley Despard	FIN-C239-66	https://consult.fingal.ie/en/submission/fin-c239-66/observation/health
Denis Collins	FIN-C239-67	https://consult.fingal.ie/en/submission/fin-c239-67/observation/aircraft-noise
Rosemary O' Brien	FIN-C239-68	https://consult.fingal.ie/en/submission/fin-c239-68/observation/margaret%20%99s-not-only-area-affected
Gisela Walsh	FIN-C239-69	https://consult.fingal.ie/en/submission/fin-c239-69/observation/dublin-airport-noise-pollution
Meakstown Community Council	FIN-C239-70	https://consult.fingal.ie/en/submission/fin-c239-70/observation/noise-air-pollution-and-environmentclimate-change-targets
Ronan Walsh	FIN-C239-71	https://consult.fingal.ie/en/submission/fin-c239-71/observation/night-flights
Shane McGovern	FIN-C239-72	https://consult.fingal.ie/en/submission/fin-c239-72/observation/noise-pollution-night-already-more-flights-being-planned
Annie Ivers	FIN-C239-73	https://consult.fingal.ie/en/submission/fin-c239-73/observation/night-time-flights
Sam Burke	FIN-C239-74	https://consult.fingal.ie/en/submission/fin-c239-74/observation/aircraft-noise-ruining-people%20%99s-lived
Esther Hoban	FIN-C239-75	https://consult.fingal.ie/en/submission/fin-c239-75/observation/draft-dublin-airport-local-area-plan-or-dublin-airport-night-time

Martin O'Malley	FIN-C239-76	https://consult.fingal.ie/en/submission/fin-c239-76/observation/night-time-noise
David Callaghan	FIN-C239-77	https://consult.fingal.ie/en/submission/fin-c239-77/observation/draft-dublin-airport-local-area-plan
Anne O'Connor	FIN-C239-78	https://consult.fingal.ie/en/submission/fin-c239-78/observation/health-risks-neighbouring-communities
Liam Sherlock	FIN-C239-79	https://consult.fingal.ie/en/submission/fin-c239-79/observation/proposed-flight-increases-will-dramatically-increase-noise
Genevest ULC	FIN-C239-80	https://consult.fingal.ie/en/submission/fin-c239-80/observation/proposal-amend-objective-pt10
Gerardine Douglas	FIN-C239-81	https://consult.fingal.ie/en/submission/fin-c239-81/observation/dublin-airport-night-time-flights
Office of Public Works	FIN-C239-82	https://consult.fingal.ie/en/submission/fin-c239-82/observation/draft-dublin-airport-lap
Peter Coyle	FIN-C239-83	https://consult.fingal.ie/en/submission/fin-c239-83/observation/draft-dublin-airport-lap
John Doherty	FIN-C239-84	https://consult.fingal.ie/en/submission/fin-c239-84/observation/draft-dublin-airport-lap
Irish Water	FIN-C239-85	https://consult.fingal.ie/en/submission/fin-c239-85/observation/section-942-water-supply
Deirdre Kennedy	FIN-C239-86	https://consult.fingal.ie/en/submission/fin-c239-86/observation/draft-dublin-airport-lap
Siobhan Flood	FIN-C239-87	https://consult.fingal.ie/en/submission/fin-c239-87/observation/draft-dublin-airport-lap
James Fitzpatrick	FIN-C239-88	https://consult.fingal.ie/en/submission/fin-c239-88/observation/night-time-flying-increases
Bridget Johnston	FIN-C239-89	https://consult.fingal.ie/en/submission/fin-c239-89/observation/stop-night-time-flights
Leo Tierney	FIN-C239-90	https://consult.fingal.ie/en/submission/fin-c239-90/observation/night-time-flying
Seamount Residents Association	FIN-C239-91	https://consult.fingal.ie/en/submission/fin-c239-91/observation/airport-noise
Rohan Holdings	FIN-C239-92	https://consult.fingal.ie/en/submission/fin-c239-92/observation/draft-dublin-airport-lap
Ambrose Jameson	FIN-C239-93	https://consult.fingal.ie/en/submission/fin-c239-93/observation/impact-increased-noise-levels-residents-lives
Tourism Ireland	FIN-C239-94	https://consult.fingal.ie/en/submission/fin-c239-94/observation/draft-dublin-airport-lap
William Lowe	FIN-C239-95	https://consult.fingal.ie/en/submission/fin-c239-95/observation/draft-dublin-area-airport-lep

Kathleen Flood	FIN-C239-96	https://consult.fingal.ie/en/submission/fin-c239-96/observation/conditions-3d-and-5-must-be-upheld
Grainne Redmond	FIN-C239-97	https://consult.fingal.ie/en/submission/fin-c239-97/observation/noise-and-health-issues
Darragh Butler	FIN-C239-98	https://consult.fingal.ie/en/submission/fin-c239-98/observation/councillor-darragh-butler-submission
James Lambert	FIN-C239-99	https://consult.fingal.ie/en/submission/fin-c239-99/observation/restrictions-night-time-flights
Jim Ryan	FIN-C239-100	https://consult.fingal.ie/en/submission/fin-c239-100/observation/sustainable-development
Emma Downey	FIN-C239-101	https://consult.fingal.ie/en/submission/fin-c239-101/observation/excessive-noise-planes
Michael Leavy	FIN-C239-102	https://consult.fingal.ie/en/submission/fin-c239-102/observation/noise-night-time-fights-dublin-airport
Parnell Keeling	FIN-C239-103	https://consult.fingal.ie/en/submission/fin-c239-103/observation/restriction-night-flights
Brendan Murphy	FIN-C239-104	https://consult.fingal.ie/en/submission/fin-c239-104/observation/noise-level-impact-residence-particularly-night
Michael O'Sullivan	FIN-C239-105	https://consult.fingal.ie/en/submission/fin-c239-105/observation/noise-impact-health
Fiona Campbell	FIN-C239-106	https://consult.fingal.ie/en/submission/fin-c239-106/observation/increased-noise-has-dramatic-health-implications
Aisling Doran	FIN-C239-107	https://consult.fingal.ie/en/submission/fin-c239-107/observation/build-open-space-feature-right-under-flight-path
Harm Luijkx	FIN-C239-108	https://consult.fingal.ie/en/submission/fin-c239-108/observation/enough-noise-already
Aisling Hayes	FIN-C239-109	https://consult.fingal.ie/en/submission/fin-c239-109/observation/noise-levels-significant-concern-family-mental-health-and
Michelle Allen	FIN-C239-110	https://consult.fingal.ie/en/submission/fin-c239-110/observation/noise-impact
Liam O'Gradaigh	FIN-C239-111	https://consult.fingal.ie/en/submission/fin-c239-111/observation/incorrect-noise-zones
Stephen McBrien	FIN-C239-112	https://consult.fingal.ie/en/submission/fin-c239-112/observation/observations
Bronagh Nugent	FIN-C239-113	https://consult.fingal.ie/en/submission/fin-c239-113/observation/noise-levels-proposed-flights
David Hayes	FIN-C239-114	https://consult.fingal.ie/en/submission/fin-c239-114/observation/night-time-proposed-flights-and-noise-impact
Paula Stafford	FIN-C239-115	https://consult.fingal.ie/en/submission/fin-c239-115/observation/strong-objection-increase-night-flights

Barbara Kearney	FIN-C239-116	https://consult.fingal.ie/en/submission/fin-c239-116/observation/noise-pollution-dublin-airport
Michael Kennedy	FIN-C239-117	https://consult.fingal.ie/en/submission/fin-c239-117/observation/draft-dublin-airport-lap
DHL Express Ltd Ireland	FIN-C239-118	https://consult.fingal.ie/en/submission/fin-c239-118/observation/draft-dublin-airport-lap
Mary McManus	FIN-C239-119	https://consult.fingal.ie/en/submission/fin-c239-119/observation/draft-dublin-airport-lap
Sheelagh Morris	FIN-C239-120	https://consult.fingal.ie/en/submission/fin-c239-120/observation/draft-dublin-airport-lap
Jacqueline Sullivan	FIN-C239-121	https://consult.fingal.ie/en/submission/fin-c239-121/observation/noise-and-increased-night-flights
John Burtchaell	FIN-C239-122	https://consult.fingal.ie/en/submission/fin-c239-122/observation/excessive-noise-impacts-health
David Doran	FIN-C239-123	https://consult.fingal.ie/en/submission/fin-c239-123/observation/observations-draft-dublin-airport-local-area-plan
Eastern and Midland Regional Assembly	FIN-C239-124	https://consult.fingal.ie/en/submission/fin-c239-124/observation/draft-dublin-airport-lap
Irish Exporters Association	FIN-C239-125	https://consult.fingal.ie/en/submission/fin-c239-125/observation/draft-dublin-airport-lap
EIRGRID	FIN-C239-126	https://consult.fingal.ie/en/submission/fin-c239-126/observation/draft-dublin-airport-lap
Fáilte Ireland	FIN-C239-127	https://consult.fingal.ie/en/submission/fin-c239-127/observation/draft-dublin-airport-lap
Environmental Protection Agency	FIN-C239-128	https://consult.fingal.ie/en/submission/fin-c239-128/observation/draft-dublin-airport-lap
IBEC	FIN-C239-129	https://consult.fingal.ie/en/submission/fin-c239-129/observation/ibec-comments-dublin-airport-lap
Downey Planning	FIN-C239-130	https://consult.fingal.ie/en/submission/fin-c239-130/observation/draft-dublin-airport-lap
GregoryHG HUGHES	FIN-C239-131	https://consult.fingal.ie/en/submission/fin-c239-131/observation/noise-pollution-and-insulation
St. Margaret's GAA Club	FIN-C239-132	https://consult.fingal.ie/en/submission/fin-c239-132/observation/impact-dublin-airport-facilities-and-gaa-club-st-margarets-preservation-st-margarets-gaa-club
Metro Dublin	FIN-C239-133	https://consult.fingal.ie/en/submission/fin-c239-133/observation/metro-dublin-submission-land-access-dublin-airport
Joanna Donnelly	FIN-C239-134	https://consult.fingal.ie/en/submission/fin-c239-134/observation/dublin-airport-opposition-proposal-increase-night-flights
Michael Dangerfield	FIN-C239-135	https://consult.fingal.ie/en/submission/fin-c239-135/observation/national-development

Miriam O'Toole	FIN-C239-136	https://consult.fingal.ie/en/submission/fin-c239-136/observation/dublin-airport-plays-critical-economic-role-and-must-be-facilitated-develop
Health Service Executive	FIN-C239-137	https://consult.fingal.ie/en/submission/fin-c239-137/observation/hse-ehs-submission
Jason Murray	FIN-C239-138	https://consult.fingal.ie/en/submission/fin-c239-138/observation/more-cheerleading-daa
George Munnelly	FIN-C239-139	https://consult.fingal.ie/en/submission/fin-c239-139/observation/night-time-noise
Christine Tarazi	FIN-C239-140	https://consult.fingal.ie/en/submission/fin-c239-140/observation/noise-levels
Angela Sweeney	FIN-C239-141	https://consult.fingal.ie/en/submission/fin-c239-141/observation/dublin-airport-needs-be-allowed-develop
Shelly Molloy	FIN-C239-142	https://consult.fingal.ie/en/submission/fin-c239-142/observation/growth-through-continued-balanced-approach
Pearse & Evelyn Sutton	FIN-C239-143	https://consult.fingal.ie/en/submission/fin-c239-143/observation/draft-dublin-airport-local-area-plan
St. Margaret's The Ward Residents Group	FIN-C239-144	https://consult.fingal.ie/en/submission/fin-c239-144/observation/draft-dublin-airport-local-area-plan
Teresa Kavanagh	FIN-C239-145	https://consult.fingal.ie/en/submission/fin-c239-145/observation/draft-dublin-airport-local-area-plan
Transport Infrastructure Ireland	FIN-C239-146	https://consult.fingal.ie/en/submission/fin-c239-146/observation/draft-dublin-airport-local-area-plan
Joe O'Brien	FIN-C239-147	https://consult.fingal.ie/en/submission/fin-c239-147/observation/noise-pollution-issues
Tony O'Reilly	FIN-C239-148	https://consult.fingal.ie/en/submission/fin-c239-148/observation/noise-pollution-climate-change
David Kelly	FIN-C239-149	https://consult.fingal.ie/en/submission/fin-c239-149/observation/capacity-constraints
Dublin Chamber	FIN-C239-150	https://consult.fingal.ie/en/submission/fin-c239-150/observation/draft-dublin-airport-lap
Inland Fisheries Ireland	FIN-C239-151	https://consult.fingal.ie/en/submission/fin-c239-151/observation/draft-dublin-airport-lap
daa plc	FIN-C239-152	https://consult.fingal.ie/en/submission/fin-c239-152/observation/submission-behalf-daa-plc
FTA Ireland	FIN-C239-153	https://consult.fingal.ie/en/submission/fin-c239-153/observation/draft-dublin-airport-lap
Howard Mahony	FIN-C239-154	https://consult.fingal.ie/en/submission/fin-c239-154/observation/airport-lap
Gerry Duggan	FIN-C239-156	https://consult.fingal.ie/en/submission/fin-c239-156/observation/draft-dublin-airport-lap

ILTP Consulting	FIN-C239-157	https://consult.fingal.ie/en/submission/fin-c239-157/observation/draft-dublin-airport-lap
UPS	FIN-C239-158	https://consult.fingal.ie/en/submission/fin-c239-158/observation/draft-dublin-airport-lap
David Healy	FIN-C239-159	https://consult.fingal.ie/en/submission/fin-c239-159/observation/please-see-attached-submission
Portmarnock Community Association & Forum	FIN-C239-160	https://consult.fingal.ie/en/submission/fin-c239-160/observation/draft-dublin-airport-lap
Sabrina Joyce	FIN-C239-161	https://consult.fingal.ie/en/submission/fin-c239-161/observation/draft-dublin-airport-lap
Darren Core	FIN-C239-162	https://consult.fingal.ie/en/submission/fin-c239-162/observation/draft-dublin-airport-lap
Tesco Ireland	FIN-C239-163	https://consult.fingal.ie/en/submission/fin-c239-163/observation/draft-dublin-airport-lap
Dean Mulligan	FIN-C239-164	https://consult.fingal.ie/en/submission/fin-c239-164/observation/observation
Orla Nic Dhiarmada	FIN-C239-165	https://consult.fingal.ie/en/submission/fin-c239-165/observation/no-proposed-night-time-aircraft-flight-increases-and-wider-noise-impact
Ian Carey	FIN-C239-166	https://consult.fingal.ie/en/submission/fin-c239-166/observation/insufficient-consideration-impact-climate-action-aviation-growth
Andona Holdings	FIN-C239-167	https://consult.fingal.ie/en/submission/fin-c239-167/observation/draft-dublin-airport-lap
IDA Ireland	FIN-C239-168	https://consult.fingal.ie/en/submission/fin-c239-168/observation/draft-dublin-airport-lap
Office of the Planning Regulator	FIN-C239-169	https://consult.fingal.ie/en/submission/fin-c239-169/observation/draft-dublin-airport-lap
National Transport Authority	FIN-C239-170	https://consult.fingal.ie/en/submission/fin-c239-170/observation/draft-dublin-airport-lap
Martin McKee	FIN-C239-171	https://consult.fingal.ie/en/submission/fin-c239-171/observation/draft-dublin-airport-lap
Emily Heslop	FIN-C239-172	https://consult.fingal.ie/en/submission/fin-c239-172/observation/draft-dublin-airport-lap
Future Analytics Consulting Ltd.	FIN-C239-173	https://consult.fingal.ie/en/submission/fin-c239-173/observation/draft-dublin-airport-lap
Daniel McGuinness	FIN-C239-174	https://consult.fingal.ie/en/submission/fin-c239-174/observation/draft-dublin-airport-lap
Margaret Kidd	FIN-C239-175	https://consult.fingal.ie/en/submission/fin-c239-175/observation/draft-dublin-airport-lap

3.0 Format of Report

The following sections of this report provide a summary of submissions, the Chief Executives response, and any proposed recommendations for amendments to the draft LAP. The submissions received from prescribed authorities, government departments, public sector and semi state bodies are summarized firstly. Submissions from other parties follow and are summarized by the chapter of the draft LAP to which the submission relates. Some submissions may relate to more than one chapter and are summarized and considered accordingly. A table summarizing proposed recommendations to the draft LAP is set out in section 17.0 of this report.

Where amendments are proposed these are set out in under the sub heading "Recommendations". Text proposed to be deleted is shown ~~crossed through~~ and new text proposed to be inserted is shown underlined.

4.0. Government Departments, Public Sector Bodies and Semi-State Bodies

Submission: Department of Culture, Heritage and the Gaeltacht (FIN-C239-4)

Summary of Comments

- The DCHG welcomes the section on Cultural Heritage in the draft LAP.
- In addition to the archaeological heritage recommendations set out in Section 9.8.1 of the draft LAP, the department recommends that key policies set out in the document, 'Framework and Principles for the Protection of the Archaeological Heritage' should be considered in the draft LAP with specific reference to the:
 - (i)The National Monuments Acts to secure the protection of archaeological heritage;
 - (ii)Gathering of information about the archaeological heritage should not destroy any more of that heritage than is absolutely necessary;
 - (iii)There should always be a presumption in favour of the avoidance of developments impact on the archaeological heritage;
 - (iv)Preservation in situ of archaeological sites must be presumed to be the preferred option;
 - (v)Where archaeological sites or monuments have to be removed as a result of development, it is essential that the approach of preservation by record be applied i.e. that there be appropriate archaeological excavation and recording; and
 - (vi)Proper archaeological assessment can ensure that the most appropriate approach to archaeological preservation is adopted.

Chief Executive's Response

The comments from the DCHG are noted. Having regard to the above, reference to the National Monuments Acts shall be included in the draft LAP. It should, however, be noted that the key points (i)–(vi) referred to above are contained within Objectives AR1, AR2 and AR3 of the draft LAP relating to the protection of archaeological heritage as set out in Chapter 9 of the draft LAP.

Recommendation

It is recommended that the following paragraph be amended at Section 9.8.1 as follows:

9.8.1 Archaeology

The principal mechanism for the protection of the archaeological resource is through *the implementation of the National Monuments Acts 1930-2004, in accordance with relevant international conventions*. The Record of Monuments and Places (RMP) *with and* sites and monuments listed in the Sites and Monuments Record (SMR) (see www.archaeology.ie) and shown on Figure 9.2 Cultural Heritage. Table 9.1 lists the archaeological sites and monuments within the Airport lands. There are also extensive archaeological remains adjacent to the boundaries of the LAP lands. It is important that

future development proposals for the LAP lands are cognisant of the potential for the discovery of further archaeological remains.'

Submission: Office of the Planning Regulator (FIN-C239-169)

Summary of Comments

- The OPR indicates that the draft LAP is consistent with the hierarchy of statutory plans at national, regional and local level including the relevant National Strategic Outcomes and National Policy under the NPF, including NSO6 relating to international connectivity and NPO 65 relating to the pro-active management of noise and considers the draft LAP to be generally consistent with the RSES.
- It is recommended that the wording of objective ED2 be amended to clearly tie the accommodation of future development on HT zoned lands to the implementation of the full range of specific measures and objectives proposed under Chapter 8 of the draft plan and to also specify the detailed assessments (transport assessment, ABTA) and related proposals (mobility management plans) etc. required to accompany applications for development, in order to ensure the protection of the core aviation function of the Airport.
- It is considered that the provisions of the draft LAP are consistent with the core strategy and objectives of the Fingal Development Plan 2017-2023 and with the hierarchy of plans.
- The draft LAP is consistent with the relevant section 28 guidelines, including the Local Area Plan Guidelines for Planning Authorities (DEC&LG, 2013)

Chief Executive's Response

The comments from the OPR are noted. It is proposed to amend the wording of objective ED02 to clearly tie the accommodation of future development on HT zoned lands to the implementation of the full range of specific measures and objectives proposed under Chapter 8 of the draft LAP. It is considered appropriate to amend Objective SF02 to specify the detailed assessments and related proposals required to accompany applications for development, in order to ensure the protection of the core aviation function of the Airport.

Recommendation

It is proposed to amend the wording of Objective ED02 and SF02 as outlined below:

Objective ED02: 'In order to protect the core aviation function of Dublin Airport, no further non-air transport related office development shall be permitted at the HT zoned lands within the Airport until such time as required roads infrastructure is in place and public and sustainable transport such as the Swords CBC and Metro Link are operational. Any planning application for further phases of development at Dublin Airport Central shall be accompanied by a traffic *and transport* impact assessment *setting out* the impact of development on core airport function *and shall include mobility management plans which shall comply with the Surface Access and Transport objectives in Chapter 8 of this LAP.'*

Objective SF02: 'Require, as part of any application that will result in increased demand for travel, the submission of a detailed transport model (based on the NTA ERM), to be undertaken in collaboration with stakeholders such as FCC, the National Transport Authority and Transport Infrastructure Ireland; a traffic and transport impact assessment; and specific proposals for the application of mobility management measures and the demonstration of consistency with the overall Dublin Airport Mobility Management Plan in order to prioritise public transport, appropriately phase transport infrastructure requirements and the appropriate provision of car-parking as set out in the South Fingal Transport Study, relevant to the growth of Dublin Airport.'

Submission: Eastern and Midland Regional Assembly (FIN-C239-124)

Summary of Comments

- EMRA notes that the RSES highlights the strategic importance of Dublin Airport as a key national asset and a primary international gateway for the Region and the state and sets out the need for careful land use planning in and around the Airport. In this regard, it is considered that the proposed draft LAP, which provides a detailed land use planning framework to facilitate the current and future development requirements of Dublin Airport along with the requisite infrastructure to support the Airport's growth, in order to ensure it fulfils its strategic function as an international gateway, is consistent with the Regional Spatial and Economic Strategy (RSES) 2019-2031.

Chief Executive's Response

The comments from ERMA are noted.

Recommendation

No change.

Submission: Transport Infrastructure Ireland (FIN-C239-146)

Summary of Comments

- TII seeks to ensure that the carrying capacity, operational efficiency, safety and significant national investment in national roads is protected in accordance with official Government policy.
- Refers to congestion experienced in the area especially during peak and inter-peak periods thereby reducing journey time reliability and that safeguarding the capacity of this roads infrastructure and building resilience is a priority as well as the need to ensure that the core airport function is maintained including the management of national road access.

- In this regard, the TII acknowledges and supports the recommendations set out in Chapter 8 of the draft LAP, the South Fingal Transport Study 2019 and the Dublin Airport Central Masterplan 2016.
- Within this context, TII notes the following:
 - Section 6.5 of the draft LAP, 'Protection of the Core Airport Function' and specifically objective ED2 relating to 'HT' High Technology zoned lands shall align with the provisions for these lands set out in Chapter 8 of the draft LAP and also address the successful practice and policy already established in the Dublin Airport Central Masterplan 2016.
 - In this regard, the section of the Dublin Airport Central Masterplan indicating that planning applications for specific developments within this plan area shall be fully compliant with transportation and mobility objectives and specifically objectives MA1, MA2, MA3, MA4 and MA5 of the Masterplan is highlighted.
 - In this context, Section 6.5 of the draft LAP requires the inclusion of further transportation assessment study, transport impact assessment and management mobility plans.
 - Regarding non-airport development, the parameters as set out in the Dublin Airport Central Masterplan 2016 shall be included in the draft LAP.
 - In addition, any significant planning application within the plan boundaries of the Dublin Airport Local Area Plan shall include a traffic and transport assessment, travel plans and the demonstration of consistency with the unified mobility management plan. This best practice shall be clearly addressed in Chapter 8 of the draft LAP and specifically within Objective EA12 and Section 8.4.5.
- In conclusion, TII is strongly committed to, and supportive of, the intent and delivery of the National Strategic Outcomes associated with High-Quality International Connectivity, Sustainable Mobility and Enhanced Regional Accessibility of the National Planning Framework.

Chief Executive's Response

The comments of TII are noted. The draft LAP sets out a policy context which recognises and supports the safeguarding of the capacity of the national road network in the vicinity of the Airport and which seeks to ensure that the core airport function is maintained including the management of national road access. In order to ensure that this is achieved, it is considered appropriate to revise objective ED02 to reflect the comments of TII to reference the requirement for compliance with surface access and transport objectives. It is also considered appropriate to expand upon the specific requirements for inclusion in planning applications as outlined by TII in Chapter 8 to reflect the parameters set out in the Dublin Airport Masterplan Objectives MA1-MA5.

Recommendation

It is proposed to amend the wording of Objective ED02 AND SF02 as outlined below:

Objective ED02: 'In order to protect the core aviation function of Dublin Airport, no further non-air transport related office development shall be permitted at the HT zoned lands within the Airport until such time as required roads infrastructure is in place and public and sustainable transport such as the Swords CBC and Metro Link are

operational. Any planning application for further phases of development at Dublin Airport Central shall be accompanied by a traffic *and transport* impact assessment setting out the impact of development on core airport function *and shall include mobility management plans which shall comply with the Surface Access and Transport objectives in Chapter 8 of this LAP.*

Objective SF02: 'Require, as part of any application that will result in increased demand for travel, the submission of a detailed transport model (based on the NTA ERM), to be undertaken in collaboration with stakeholders such as FCC, the National Transport Authority and Transport Infrastructure Ireland; *a traffic and transport impact assessment; and specific proposals for the application of mobility management measures and the demonstration of consistency with the overall Dublin Airport Mobility Management Plan* in order to prioritise *public transport*, appropriately phase transport infrastructure requirements and the appropriate provision of car-parking as set out in the South Fingal Transport Study, relevant to the growth of Dublin Airport.'

Submission: National Transport Authority (FIN-C239-170)

Summary of Comments

- Submission outlines general agreement with the objectives and measures contained in the draft LAP for the provision of surface access and transport to serve the Airport which are largely reflective of the 'South Fingal Transport Study'.
- The NTA notes the key challenge currently and in future years will be to manage the on-going anticipated increase in surface access transport demand in a manner which maximises the Airport's accessibility for staff, passengers and freight related movement, both from within the Greater Dublin Area and at national level. This in turn needs to be combined with the effective management of traffic on the local and strategic road networks and the provision of public transport alternatives consistent with the Transport Strategy for the Greater Dublin Area, associated with the operation of the Airport's core functions.
- In this context, safeguarding the capacity of this roads infrastructure and services and building resilience is a priority as well as the need to ensure that the core airport function is maintained and protected in recognition of their primacy over any other development objective in the draft LAP.
- Requests that the provisions of ED2 of the draft LAP relating to the protection of core airport function as set out in Chapter 6 shall align more clearly with objective EA12, objective SF02, section 8.4.5 (Airport Based Commercial Development) and objective IA5 and Section 8.5.5 (Hierarchy of Preferred Modes of Travel to Dublin Airport) of the draft LAP.
- Critically, objectives EA12, SF02 and IA5 shall make specific reference to a requirement for a further transport assessment study and transport impact assessment relating to the Airport Campus and the plan area as a whole to be undertaken in consultation with the Local Authority in association with the NTA

and TII, prior to the consideration of any further airport based commercial development.

- Whilst emphasising the importance of this requirement for airport-based commercial development in managing development which does not form part of the Airport's core function, this requirement shall apply, in the case of any significant development proposals within the plan lands and is considered by the NTA to be an essential prerequisite to safeguarding the effective operation of the Airport's core function.
- Complementary to this, the draft LAP shall incorporate the policy and practice already established in the Dublin Airport Central Masterplan which requires that planning applications for specific developments within this plan area shall be fully compliant with transportation and mobility objectives and specifically objectives MA1, MA2, MA3, MA4 and MA5.
- In addition to these objectives, Objective MM1 in Chapter 8 of the draft LAP shall state that the overarching MMP shall apply to development on all lands within the local area plan boundary.
- Furthermore, the draft LAP shall include a requirement whereby any significant planning application within the Dublin Airport Local Area Plan area shall be informed by a transport assessment relating to the plan area as a whole, the preparation of a traffic and transport assessment and a management mobility plan which demonstrates consistency with the unified mobility management plan.
- Objectives CY1 and CY2 relating to cycling infrastructure as set out in Section 8.3 'Public Transport and Sustainable Transport' shall include a reference to the National Cycle Manual and that all cycle facilities shall be designed in accordance with best practise.
- The NTA acknowledges the extensive reference in the draft LAP to the transport infrastructure and services identified as being required to meet the Airport's future transport demand, in the context of the wider South Fingal area and the Greater Dublin Area as a whole. This has been informed by the South Fingal Transport Study 2019 and more generally by the Transport Strategy for the Greater Dublin Area 2016-2035.
- The NTA will continue to work with FCC, the TII and other relevant agencies in the planning and implementation of the GDA Strategy in this area and in doing so, supporting the achievement of the relevant NPF and NDP objectives.

Chief Executive's Response

The comments of NTA are noted. The draft LAP sets out a policy context which recognises and supports the safeguarding of the capacity of the road network in the vicinity of the Airport and which seeks to ensure that the core airport function is maintained to maximise the Airport's accessibility for staff, passengers and freight related movement. In order to ensure that this is achieved, it is considered appropriate to revise objectives ED02, SF02, EA12, CY1 and CY2 to reflect the comments of NTA.

To address the concerns raised by NTA, a number of amendments are proposed to Objective SF02 to address the need to require traffic and transport impact assessment

and mobility management measures and to provide for a greater shift towards public transport. These amendments also provide for the incorporation of the requirements of MA1 – MA5 of the DAC Masterplan.

In relation to the suggested amendment to Objective IA5 relating to a requirement for a further transport assessment study and transport impact assessment, it is considered that this is sufficiently addressed under the amendments to Objective SF02 which is an overarching requirement relating to requirements for inclusion in planning applications.

Recommendation

Amend Objectives ED02, SF02, EA12, CY1 and CY2, MM1 and MM4 as outlined below:

Objective ED02: 'In order to protect the core aviation function of Dublin Airport, no further non-air transport related office development shall be permitted at the HT zoned lands within the Airport until such time as required roads infrastructure is in place and public and sustainable transport such as the Swords CBC and Metro Link are operational. Any planning application for further phases of development at Dublin Airport Central shall be accompanied by a traffic *and transport* impact assessment *setting out* the impact of development on core airport function *and shall include mobility management plans which shall comply with the Surface Access and Transport objectives in Chapter 8 of this LAP.*'

Objective SF02: 'Require, as part of any application that will result in increased demand for travel, the submission of a detailed transport model (based on the NTA ERM), to be undertaken in collaboration with stakeholders such as FCC, the National Transport Authority and Transport Infrastructure Ireland; *a traffic and transport impact assessment; and specific proposals for the application of mobility management measures and the demonstration of consistency with the overall Dublin Airport Mobility Management Plan* in order to prioritise *public transport*, appropriately phase transport infrastructure requirements and the appropriate provision of car-parking as set out in the South Fingal Transport Study, relevant to the growth of Dublin Airport.'

Amend Objective EA12:

Objective EA12: 'To maintain and protect accessibility of freight to and from Dublin Airport as a priority in particular with respect to accessibility from the M1, M50 and the TEN-T network for freight movements. Any planning applications for new or expansion of freight and cargo operations within the DA zoned lands shall be accompanied by a traffic *and transport* impact assessment, *specific proposals for the application of mobility management measures and the demonstration of consistency with the overall Dublin Airport Mobility Management Plan.*'

Amend Objective CY1 and CY2 as follows:

Objective CY1: 'Provide for cycle paths separated from traffic along the R132 between Pinnock Hill Roundabout and the boundary with Dublin City Council as part of the

Swords Core Bus Corridor. *Cycle paths shall comply with the National Cycle Manual and shall be designed in accordance with best practice.'*

Objective CY2: 'All development proposals within the LAP shall be required to demonstrate provision of high quality cycle facilities for employees, to include secure bike parking facilities, and changing and shower facilities to incentivise sustainable transport. *Cycle facilities shall comply with the National Cycle Manual and shall be designed in accordance with best practice.'*

Amend Objective MM1 as follows:

Objective MM1: 'Facilitate, with the relevant stakeholders, the coordination and/or amalgamation of all Mobility Management Plans within the Dublin Airport LAP area~~campus~~, to provide an over-arching MMP for submission to Fingal County Council for approval every three years. This will include the designation of a mobility manager for the Airport by daa who should co-ordinate, engage and review the MMP. The first co-ordinated MMP should be delivered within 2 years of this LAP.'

Amend Objective MM4 as follows:

Objective MM4: Require that all organisations operating within the Dublin Airport LAP area~~campus~~ implement the overarching Mobility Management Plan, either as part of regular stakeholder liaison or incorporation within the development management process, *through submission of MMPs with planning applications.*

Submission: Office of Public Works (FIN-C239-82)

Summary of Comments

- OPW support commitments made within the draft LAP, specifically objectives FM01-FM04 relating to flood risk management. OPW supports continued commitment to adhere to the Planning System and FRM Guidelines (2009).
- OPW note that notwithstanding works carried out on the R132 Rd Improvement Scheme, that flood storage exists for the Cuckoo Stream on the greenfield sites to the west of this scheme bounded by M1. This site is within Flood Zone A and needs to be closely monitored.
- OPW note that the key recommendations made by JBA in the Strategic Flood Risk Assessment and Surface Water Management Plan should be adhered to and they welcome the continued consultation on the Airport Drainage Masterplan with Nicholas O'Dwyer Engineers.

Chief Executive's Response

Any proposed development in this area will be monitored through the Development Management process and shall comply with The Planning System and Flood Risk Management Guidelines' and the provisions of the Fingal Development Plan 2017 -2023.

Recommendation

No change.

Summary of Comments

Foul Drainage and Water Supply

- IW refer to Objectives IW2 and IW3 relating to water supply and note that they are progressing a number of major capital schemes which will support the ongoing development of Dublin Airport and which will address capacity constraints i.e. Sutton Pumping Station DAP. Their submission references ongoing IW projects including Ringsend Upgrade Project and the GDD Project.
- IW notes that Dublin Airport is served by the North Fringe Sewer, which currently discharges to Ringsend WWTP via Sutton Pumping Station. Capacity management of the North Fringe Sewer and ensuring separate discharges to the system is a key objective in the catchment strategy. It is noted that the network currently collecting discharges from the Airport and immediate environs, will be diverted to the Orbital Sewer for treatment at the proposed GDD Clonshagh WWTP. Once operational, capacity management in the catchment, in terms of separated foul and storm water systems, will continue to play a key role in ensuring the availability of adequate long term collection and treatment services for the Airport area.
- IW notes that part of the GDD Orbital Sewer will pass through daa owned lands and the LAP should ensure that adequate provision is made for the construction and future access for maintenance of this pipeline which is vital to the Airport's development, including adequate temporary working areas to ensure the pipeline can be constructed safely.
- IW welcomes the inclusion of Objective IW1 *'Liaise with Irish Water to ensure that an adequate supply of drinking water is available for the sustainable development of the Airport'* and requests the addition of the following:

'Regular liaison between FCC, the daa and Irish Water...'

- IW notes it is in the process of developing its 25 year strategy for water supply services, the National Water Resources Plan and that IW has developed a plan for developing and integrating new sources of water over the coming years that will allow the region to conform to best international standards in terms of water supply. In the interim, existing supplies will be carefully managed to maintain levels of service to existing water users and to best facilitate all required growth. IW notes that it is necessary to understand the current and future water demand profile to ensure that a sustainable and resilient drinking water supply is available for the full development of the Airport. As this information is not provided in the draft LAP, IW would welcome early engagement between FCC, the daa and IW, should the draft LAP be adopted.

Surface Access and Transport

- IW refers to Section 8.2.1 'External Road Network' and Section 8.2.2 'Bottlenecks on the Road System' and specifically that the majority of the road network at the eastern side of the Airport Campus is operating at or near capacity. In this regard, IW recommends that the LAP shall ensure that traffic and transportation in the area, in particular, to the east of Dublin Airport, shall consider traffic generated from the construction and operation phases of the Greater Dublin Drainage Project.

Chief Executive's Response

Foul Drainage and Water Supply

It is noted within the screening statements for AA and SEA of the draft LAP that Ringsend is operating at capacity. Notwithstanding that planning permission has been granted for the Greater Dublin Drainage Project, it is considered that a statement confirming that planning permissions are dependent on adequate wastewater treatment capacity should be contained within the text of the draft LAP.

Fingal County Council in collaboration with Irish water regularly monitor developments within or adjacent to the Greater Dublin Drainage project route to ensure potential conflicts are prevented. It is inherent within the objectives IW1, IW2, IW3 of the draft LAP that there is regular and continued liaison with Irish water to ensure the sustainable development of the Airport.

Surface Access and Transport

A traffic management plan is required to be prepared for any large scale developments at the airport and required as part of condition 13 of the planning permission for the Greater Dublin Drainage Project. These will consider traffic generated from the project.

Recommendation

Insert the following new text into Section 9.4.1 'Foul Drainage' of the draft LAP:

'Multiple projects are currently being progressed by Irish Water to deliver the infrastructure and capacity necessary for predicted population growth within the Dublin Region. Any increased water demand or foul discharge from the plan lands will be contingent on the constraints of the Irish Water Capital Investment Programme and the approval of Irish Water as part of the statutory approval process within any planning application. The growth of Dublin Airport will be subject to the progress of the various improvement works and subject to the agreement of Irish Water. Planning consent will be dependent on capacity within waste water treatment infrastructure.'

In particular, the following key projects are applicable to Dublin Airport.

1. *Ringsend Wastewater Treatment Plant upgrade - The Ringsend Wastewater Treatment Plant is currently overloaded. An application for the upgrade was lodged with An Bord Pleanála in June 2018 and granted permission in April 2019. Upgrade works are scheduled to increase the treatment capacity from 1.64 million p.e. to 2.4 million p.e. This upgrade is currently programmed to be complete in 2025.*

2. Greater Dublin Drainage Project – Planning application lodged with An Bord Pleanála in 2018, oral hearing held in March 2019 and consent granted in November 2019.

Submission: EIRGRID (FIN-C239-126)

Summary of Comments

- EIRGRID notes its responsibility for the safe, secure and reliable transmission of electricity throughout Ireland and its role in the development, management and operation of the electricity transmission grid. It is further highlighted that electricity infrastructure is critical for the development of Dublin Airport and the surrounding area and particularly where the Airport depends on a reliable, high quality electrical supply.
- The reference and emphasis placed on a high-voltage electrical network in Section 7.5.1 ‘Electrical and Gas Supply’ of the draft LAP is noted. However, EIRGRID consider that policies and objectives which support a safe, secure and reliable supply of electricity shall be explicit in the draft LAP in order to support EIRGRID’s successful implementation of its Grid Development Strategy - Your Grid, Your Tomorrow (2017) (ENCL2). This is imperative to meeting national targets for electricity generation, climate change targets, and security of energy supplies. In this context, EIRGRID proposes an amendment to Objective UT1, to ensure a robust and sustainable policy as follows:

OBJECTIVE UT1‘Support and facilitate the development and upgrade of strategic information telecommunications technology, electricity network and other required utilities infrastructure.’

- In essence, it is essential that the draft LAP reflects EIRGRID’s need for robust policies to develop the electricity grid in a safe and secure way. This is necessary to meet projected demand levels, government policy and to ensure a long-term, sustainable and competitive energy future for Ireland. The draft LAP should facilitate the development of grid reinforcements including grid connections.
- EIRGRID is committed to positive collaboration and engagement with FCC, in particular from a strategic energy policy perspective.

Chief Executive’s Response

The draft LAP at Chapter 7 and specifically Section 7.5.3 Additional Supporting Utility Infrastructure acknowledges that as Dublin Airport continues to grow, additional supporting utility infrastructure will be required. In this regard, the draft LAP notes that the electrical load is expected to increase with growth depending on the evolution of renewable resources and technologies. It is further acknowledged in the draft LAP that building additional resilience into the electrical system separate to the Dardistown Sub Station is also a requirement for the Airport. Given the critical importance of electrical

supply to the overall operations of the Airport especially in the context of airport growth, it is considered acceptable to amend Objective UTI in Section 7.5.3 of the draft LAP to include reference to the electricity network. Regarding the development of any future grid reinforcements including grid connections, it is noted that utility installations of this nature are permitted in principle under the 'DA' zoning objective under the provisions of the FDP 2017-2023 and any proposals in this regard will be assessed through the Development Management process.

Recommendation

Amend Objective UTI as follows:

OBJECTIVE UT1'Support and facilitate the development and upgrade of strategic information telecommunications technology, electricity network and other required utilities infrastructure.'

Submission: Tourism Ireland (FIN-C239-94)

Summary of Comments

- Tourism Ireland highlights the importance of the tourism industry to the island of Ireland. It is noted that the tourism sector is the largest indigenous industry responsible for in excess of 4% of GNP in the Republic of Ireland and employing around 325,000 people across the island. In 2018, it is highlighted that 11.2 million overseas visitors visited the island of Ireland (+5% on 2017), delivering revenue of approximately €5.86 billion (+5%). In this context, the critical importance of Dublin Airport as the main gateway for our overseas visitors and its vital role in the continued growth of overseas tourism to Ireland particularly in the context of the development of emerging new routes is highlighted.
- Tourism Ireland welcomes the provisions of the draft LAP which supports the continual and sustainable growth and development of the Airport into the future. Specifically, the positive policy commitments which will be key in supporting such growth at Dublin Airport as set out in the draft LAP including the acknowledgement of the importance of good environmental and sustainable practices and the commitment to protect airport safety and security is supported and welcomed. It is requested that the draft LAP includes a growth horizon which provides adequate flexibility for future growth at Dublin Airport.

Chief Executive's Response

The comments from Tourism Ireland are noted. The proposed forecast passenger growth set out in the draft LAP is guided by the Department for Transport, Tourism and Sport 'Review of Capacity Needs at Ireland's State Airports' document. The forecasts are considered appropriate in terms of the timeframe of the draft LAP and the required infrastructure to cater for the associated future levels of demand for travel during that period. The analysis carried out to date in the preparation of this draft LAP and the supporting South Fingal Transport Study has identified the infrastructural measures

that are required to cater for forecast passenger growth. To adopt a significantly higher figure would result in unsustainable impacts on the transportation network and would exceed the likely forecast capacity of the future transport network, an outcome that would be contrary to the proper planning and sustainable development not only of the plan area but of the wider surrounding South Fingal area.

Recommendation

No change.

Submission: Failte Ireland (FIN-C239-127)

Summary of Comments

- Failte Ireland highlights the importance of tourism to the Irish economy as a revenue generator and as an economic driver. Dublin Airport is a major piece of tourism infrastructure and the value of Dublin Airport to the economy from a tourism perspective is noted and recent trends in growth are outlined. Submission outlines that to achieve projected future growth, Dublin Airport will need to grow passenger capacity correspondingly. Submission outlines that the draft LAP should make provision to accommodate and support this growth and increased capacity in a sustainable manner in line with the NPF as it particularly relates to high quality international connectivity, national aviation and tourism policy, the Fingal Development Plan 2017-2023 and the Greater Dublin Area Transport Strategy.
- In this context Failte Ireland recommends the inclusion of robust policy objectives which:
 - Support the prioritisation and delivery of the north runway which seeks to enable sustainable and managed growth.
 - Address any unnecessary or unprecedented restrictions on capacity at the Airport, the current planning permission for the north runway and associated conditions restricting the number of flights between the hours of 23.00 and 7.00 is cited in this regard.
- Failte Ireland contends that high quality surface access to and from Dublin Airport is a key enabler to the growth of the Airport, Dublin City and the Country as a whole and the quality of the overall visitor experience and recommends the inclusion of robust policy objectives with regards to surface access and transport in the draft LAP as follows:
 - Prioritisation of the Metrolink project in the context of the growth of tourism and the quality of the visitor experience; and
 - Maintain and increase existing road and public transport access to the Airport, prioritise service improvements, signage, management and maintenance along strategic corridors to and from the Airport.

Chief Executive's Response

The proposed forecast passenger growth set out in the draft LAP is underpinned by the Department for Transport, Tourism and Sport 'Review of Capacity Needs at Ireland's State Airports' document. The forecasts are considered acceptable in terms of the timeframe of the LAP and the required infrastructure to cater for the associated future levels of demand for travel during that period. The analysis carried out to date in the preparation of this draft LAP and the supporting South Fingal Transport Study has identified the infrastructural measures that are required to cater for forecast passenger growth and to support the proper planning and sustainable development not only of the plan area but of the wider surrounding South Fingal area.

In relation to the north runway, this is currently under construction and its delivery and operation is supported by existing planning policy in the FDP 2017-2023 and objective RW1 in the draft LAP. In relation to restrictions on the operation of runways, any changes to operating conditions will be required to be considered as part of a planning application, and where relevant subject to consideration by the Aircraft Noise Competent Authority. Proposed Variation No. 1 to the FDP sets out noise zones relating to potential future use of parallel runways at Dublin Airport in order to protect sensitive land use in the vicinity of the Airport and protect the operational safeguarding of Dublin Airport.

The draft LAP recognises that growth at Dublin Airport will be, to a large extent, dependent on the ability of passengers and staff to efficiently and conveniently access the Dublin Airport campus. The required transport infrastructure to facilitate access to Dublin Airport has been identified in the South Fingal Transport Study 2019 and the draft LAP includes the relevant recommendations of that study with a particular focus on public and sustainable transport options and recognises the importance of the delivery of key transport infrastructure projects such as Metrolink and BusConnects. A key objective of the draft LAP is to protect capacity of transport infrastructure for the core aviation function of Dublin Airport.

Recommendation

No change.

Submission: Environmental Protection Agency (FIN-C239-128)

Summary of Comments

- New European Communities (Environmental Noise) Regulations 2018 should be taken into account in the draft LAP. These regulations include a requirement for Local Authorities to submit an annual progress report to the EPA on their action plans. Recommends this be included as part of overall monitoring programme in SEA.
- Refers to new WHO Environmental Noise Guidelines for the European Region 2018, which submission states should be taken into account in the draft LAP.

- Advises that specific roles and responsibilities of each authority with responsibility for the operation of the Airport should be set out, in particular specific responsibilities for addressing noise complaints. Recommends explaining the differences in the mapping exercises linked to the land use planning and those relating to the Noise Action Plan for Dublin Airport, including explaining the significance and context of how both mapping processes address environmental noise in the plan. Recommends that the Noise Action Plan for Dublin Airport be fully integrated into the draft LAP and that key elements and recommendations of the Noise Action Plan for Dublin Airport be summarised in Chapter 9 of the draft LAP.
- The findings of the Air Quality in Ireland 2018 Report should be considered and integrated as appropriate and relevant to the draft LAP.
- LAP should align with national commitments on climate action, in particular the Climate Action plan, the National Mitigation Plan and FCC Climate Change Action Plan and any other relevant plans. The LAP should support the urgent need for better, more integrated spatial, transport and infrastructure planning.
- Makes recommendations in relation to SEA Environment Report that an annual (or bi-annual) monitoring report is prepared and published during the lifetime of the LAP, to support effective evaluation of the LAPs environmental performance.
- Notes there is no standard national approach or guidance relating to the management of noise in the planning process and that UK ProPG and AACI guidance could be useful.
- Recommends FCC undertake a noise health impact assessment to assist in identifying any noise problem.
- Recommends a mechanism be put in place to escalate noise complaints where there is dissatisfaction with a response from the Airport authority.
- FCC should establish how this new statutory function might overlap with the Environmental Noise Directive Requirements (e.g. noise mapping, action plans, and responsible bodies) and submission identifies the need for co-ordination and consultation mechanism to link site-specific planning issues related to noise to the overall strategic role of the END.
- Outlines publications and research relating to noise and health.
- Advises of SEA guidance document and outlines recommendations in relation to monitoring including noise monitoring and references monitoring indicators and targets for FDP 2017 SEA, noting some not relevant to the draft LAP ER, eg residential. Advises that the monitoring programme should set out the data sources and monitoring frequencies. If the monitoring identifies adverse impacts during the implementation of the Plan, Fingal County Council should ensure that suitable and effective remedial action is taken.
- Makes recommendations for inclusion in SEA report including EPA scoping comments, consideration of alternatives, assessment of effects, commitment to implementation of mitigation measures, and integration of findings of the most recent EPA State of the Environment Report.
- Advises of statutory obligations relating to SEA process.

Chief Executive's Response

Environmental Noise Regulations 2018

In relation to European Communities (Environmental Noise) Regulations 2018 requirement for Local Authorities to submit an annual progress report to the EPA on their action plans, this relates to Noise Action Plans which was prepared in 2018. This draft LAP responds to specific actions set out in the NAP related to land use planning and management. It is proposed to include the FCC annual progress report to the EPA on Noise Action Plans to the list of sources in Table 10.1 of SEA Environment Report.

WHO ENG

The WHO Environmental Noise Guidelines 2018 (WHO ENG) have been considered in the preparation of proposed Variation No. 1 of the FDP 2017-2023 which provides for revised aircraft noise zones relating to potential future operating scenarios at Dublin Airport. The proposed Variation has been prepared alongside this draft LAP. In recognition of the evidence set out in WHO Night Noise Guidelines for Europe 2009 (WHO NNG) and WHO ENG linking health effects with aircraft noise, including noise at night, appropriate noise exposure thresholds for night time have been included in noise zones set out in proposed Variation No. 1 which include a threshold of 40dB Lnight in Zone D (WHO ENG defined level at which adverse effects start to occur).

Roles and Responsibilities of Each Authority

The draft LAP provides for a land use planning policy in relation to future decisions the Airport. Whilst proposed Variation No. 1 provides for noise zones relating to potential future aircraft noise, the NAP maps the current situation with regard to aircraft noise and provides a framework of noise management at the Airport of which the draft LAP and proposed Variation No. 1 to the FDP form a part. These are different processes with responsibility for mapping different scenarios, which have used the same methodology relating to noise measurements. It is considered appropriate that the two plans sit alongside each other without significant overlap as they are drawn up under different legal frameworks and responsibilities. Many of the actions contained within the NAP do not relate to land use planning. The actions set out in the NAP relating to Land Use Planning and Management seek to review existing land use planning frameworks in so far as they relate to Dublin Airport and to monitor encroachment associated with Dublin Airport to ensure that airport noise policy is appropriately informed through land use planning. Proposed Variation No. 1 and the draft LAP set out land use planning frameworks in this regard. The Variation and draft LAP have been prepared, in part, to deliver on Action 3 in Table 10 of the NAP. Section 9.1 of the draft LAP sets out an overview of the purpose of the NAP and the link between the NAP and these land use plans.

The NAP sets out roles and responsibilities for management of noise at the Airport, including the handling of noise complaints. daa is the authority with responsibility for dealing with noise complaints relating to aircraft at Dublin Airport through the Noise and Flight Track Monitoring Service.

The FCC role as Aircraft Noise Competent Authority (ANCA) is independent of both the Planning and Strategic Infrastructure and the Environment roles of FCC, and therefore independent of the draft LAP and NAP.

The role of FCC as ANCA is set out within the Aircraft Noise (Dublin Airport) Regulation Act 2019 as an independent authority with exclusive competence to impose, revoke, replace or amend, and monitor operating restrictions at the Airport. It is not currently envisaged that there is an overlap with the END, NAP or LAP responsibilities.

Air Quality

The draft LAP recognises that emissions are a concern for human health, with a commensurate impact on biodiversity. This includes NOx/Nitrous Oxide. Monitoring currently takes place by daa at locations within and proximate to the DA zoned lands in conjunction with the EPA. Objective AQ5 of the draft LAP commits to undertaking a review of the existing air quality monitoring, including locations.

In relation to the SEA Environmental Report, Information from the EPA's Air Quality in Ireland 2017 Report (EPA, 2018) is included in the SEA Environmental Report. This information will be updated to reflect the information of the more recent EPA's Air Quality in Ireland 2018 Report (EPA, 2019). Various provisions have been integrated into the draft LAP and the Fingal Development Plan that will contribute towards maintaining and improving air quality and reducing/limiting increases in emissions.

Climate Action

Comments are noted in relation to SEA procedures and guidance. The draft LAP is consistent with the need for proper planning and sustainable development and is consistent with key relevant higher-level plans and programmes. The Climate Change Action Plan, 2019 – 2024 and the Fingal Development Plan outline adaptation and mitigation measures and actions to address Climate Change. The draft LAP is underpinned by a key objective to facilitate improved surface access to Dublin Airport, with a particular emphasis on sustainable modes. Growth at Dublin Airport is linked to the provision of this improved access thereby ensuring more integrated spatial, transport and infrastructure planning at Dublin Airport.

Noise Guidance

The Dublin Agglomeration Environmental Noise Action Plan, Volume 3 Fingal County Council, 2018, acknowledges that there is currently no national guidance on the management of noise in the planning process, and proposes that FCC develop guidelines relating to Noise and Planning for FCC based on good Acoustic Design. The commitment contained in the National Planning Framework to provide national guidance relating to noise is noted. In the absence of national guidance, proposed Variation No 1 to the FDP which has been prepared alongside this draft LAP sets out objectives relating to management of noise from road, rail and aircraft to avoid, mitigate and promote the pro-active management of noise in land use planning. This proposed Variation acknowledges the health impacts of noise in land use planning and sets out updated noise zones to provide for mitigation of the impact of noise on future residential and other noise sensitive uses. The noise zones aim to support future

sustainable growth and development within lands exposed to aircraft noise, whilst facilitating the effective operation of the airport in line with national policy.

SEA

Comments are noted. SEA guidance document referred to has been considered in the preparation of the SEA Environmental Report and will continue to be referenced throughout the LAP process, as relevant and appropriate to the LAP.

In relation to inclusion in SEA Monitoring Programme of annual progress report relating to European Communities (Environmental Noise) Regulations 2018, Table 10.1 of the SEA ER shows the indicators and targets to be used for monitoring the likely significant environmental effects of implementing the LAP, if unmitigated. The annual progress report referred to would be useful in addressing indicators already identified and should be added to the list of sources in Table 10.1 of the SEA Environmental Report.

In relation to monitoring indicators and targets for FDP 2017 SEA, eg residential, the measures selected are those that were developed through the SEA process for the Fingal Development Plan and finalised in 2017. It is proposed to remove reference to residential buildings as these are 'not permitted' within DA zoned lands in the 2017 FDP.

In relation to the proposed monitoring programme, all aspects of the draft LAP identified as having the potential for negative environmental effects (such as noise, air quality etc.) are appropriately reflected through indicators in the proposed monitoring programme. The two additional sources of information identified in the submission would be useful in addressing the indicators already identified and these should be added to the list of sources in Table 10.1 of the SEA Environmental Report. It is proposed to add the Council's annual progress report to the EPA on Noise Action Plans to the list of sources in Table 10.1 of the SEA Environmental Report and to add data from the EPA-managed network of air quality monitoring stations (including in Fingal and Swords) to the list of sources in Table 10.1 of the SEA Environmental Report.

In relation to monitoring the LAP, Table 10.1 in the SEA Environmental Report shows the indicators and targets to be used for monitoring the likely significant environmental effects of implementing the LAP, if unmitigated. Sources are identified for all indicators, under the "Source(s)" column. Frequencies are identified for most sources, also under the "Source(s)" column. It is recommended that the table in the SEA ER is reformatted to include a separate "Frequencies" column and that frequencies are identified where possible for all sources. As identified under Section 10 of the SEA Environmental Report, "Monitoring can enable, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action". It is recommended to add the following statement to the SEA ER in response to the EPA's submission: "If the monitoring identifies unforeseen significant adverse impacts during the implementation of the Plan, Fingal County Council will ensure that suitable and effective remedial action is taken as relevant and appropriate."

In relation to recommendations that an annual (or bi-annual) monitoring report is prepared and published during the lifetime of the LAP, to support effective evaluation

of the LAPs environmental performance, the SEA ER for the LAP has included the following text: A stand-alone Monitoring Report on the significant environmental effects of implementing the Plan will be prepared during implementation of the Plan, in advance of the beginning of the review of the Plan. Furthermore, it is noted that it is an objective of the EPA to issue guidance relating to monitoring of Plans and this will be taken into account when undertaking monitoring in relation to the plan.

In relation to assessment of alternatives, alternatives are described in Section 6 of the SEA Environmental Report. Alternatives are assessed in Section 7 of the SEA Environmental Report, including against 'Strategic Environmental Objectives' at Tables 7.3 to 7.6. Selected alternatives for the Plan are identified in Section 7.5 of the SEA Environmental Report.

In relation to assessment of environmental effects Section 5 of the SEA Environmental Report identifies 'Strategic Environmental Objectives' that are used in the assessment. These objectives are relevant and specific to the LAP and SEA. The objectives reflect the specific nature of the draft Dublin Airport LAP and address the key environmental issues identified. Sections 7 and 8 assess and document the full range of significant environmental effects of implementing the LAP, including the potential for cumulative effects in combination with other relevant Plans/Projects and Programmes. In finalising the assessment, it is proposed to provide further explanation to that already provided on Table 8.3 on the nature and extent of likely 'residual adverse significant effects'.

In relation to mitigation measures, where the potential for likely significant effects has been identified, appropriate mitigation measures, including those that form part of the Draft LAP's commitments, have been identified. Comments relating to inclusion of Noise Action Plan for Dublin Airport have been addressed above.

In relation to State of the Environment Report – Ireland's Environment 2016, the 2016 state of the environmental report has been considered in the preparation of the Draft LAP and SEA and it will be considered throughout the remainder of the LAP preparation process as relevant and appropriate. Any future iterations of this draft LAP will be taken into account in implementing the LAP and in future reviews as relevant and appropriate.

In relation to inclusion of SEA scoping submissions and responses, Appendix 1 to the EPA's scoping submission includes "Noise specific comments to consider in preparing the Plan", these comments were taken into account in the preparation of the draft LAP. The comments and how they were taken into account will be included in the SEA Statement prepared on adoption of the LAP.

Any proposed amendments to the draft LAP will be screened for potential for likely significant effects in accordance with the criteria set out in Schedule 2A of the SEA Regulations (S.I. No. 436 of 2004), as amended, and using the same method of assessment applied in the "environmental assessment" of the draft LAP. Once the LAP is adopted, an SEA Statement will be prepared that addresses the relevant requirements. The Statement will be circulated to environmental authorities as relevant. The authorities cited in the submission have already been consulted with as relevant.

Recommendation

No change to draft LAP.

It is proposed to amend the SEA Environment Report as follows:

- Section 4.9.3 replace text relating to EPA's (2018) Air Quality in Ireland 2017 Report with the following text which relates to the EPA's (2019) Air Quality in Ireland 2018 Report

The EPA's (2019) Air Quality in Ireland 2018 identifies that:

- o Levels at monitoring sites in Ireland were below the EU legislative limit values in 2018;
- o Ireland was above World Health Organization (WHO) air quality guideline value levels at a number of monitoring sites for fine particulate matter, ozone and nitrogen dioxide;
- o Ireland was above the European Environment Agency reference level for Polycyclic Aromatic Hydrocarbon (PAH), a toxic chemical, at three monitoring sites.

Problem pollutants identified by the EPA include particulate matter from burning of solid fuel and nitrogen dioxide from transport emissions in urban areas. Indications that Ireland will exceed EU limit values for nitrogen dioxide in the near future.

With regards to solutions, the report identifies that:

- o To tackle the problem of particulate matter, clean ways of heating homes and improve energy efficiency of homes can be progressed; and
- o To reduce the impact of nitrogen dioxide, transport options in the Government's Climate Action Plan can be implemented and transport choices can be considered by individuals.

- Table 5.1 Strategic Environmental Objectives (SEOs), Indicators and Targets: include the following footnote after Environmental Component *Population and Human Health* Population and Human Health has the potential to interact with various environmental components – including "Soil", "Water", "Air and Climatic Factors", "Material Assets" and "Landscape". Various indicators and targets are provided for these components on this table.

In selected targets for Air and Climatic factors AC1, replace the following text 10% increase in the number of people using sustainable transport modes (rail, bus, cycling walking) against current 2011 Travel to Work Modes. (target also linked to No. 3 PHH2 above) with To increase the proportion of journeys to and from the airport that are taken on public transport or walked or cycled over the Plan period

Table 5.1, to replace the following indicator and target under SEO No. 7:—

~~Percentage of new residential buildings granted planning with A3 or higher BER;~~

~~All new buildings to have an A3 or higher BER~~With the following text: The 2nd Fingal Development Plan SEA Monitoring Indicator and Target under this SEO are

not directly relevant to the Airport LAP area; no additional measures are required.

- Table 8.3 Overall findings, amend table heading as follows: Likely Residual Adverse Significant Effects

Insert the following text in relation to Air and Climatic Factors under sub-heading Likely Residual Adverse Significant Effects. New Footnote: As detailed under Section 8.2, greenhouse gas emissions associated with flights operating in the EEA are covered by the EU ETS and airlines are required to monitor, report and verify their emissions, and to surrender allowances against those emissions. The scope of aviation in the EU ETS is limited to flights within the EEA. CORSIA will come into effect in 2021 and aims to stabilise global aviation emissions at 2020 levels by requiring airlines to offset any emissions growth after 2020 by purchasing eligible emission units generated by projects that reduce emissions in other sectors. As Ireland is a member of ICAO, Irish aircraft operators will have to offset any emissions growth after 2020 by purchasing eligible emission units, i.e. pay full carbon price. Greenhouse gas emissions from surface access will be limited by the wide policy framework relating to climate mitigation and adaptation, alternative energy use and energy/fuel efficiency, including provisions relating to the Metro, Swords Road Core Bus Corridor and increasing usage of electric cars.

The onsite and offsite data collected since implementation of the local air quality monitoring programme at Dublin Airport has been generally found to be well within the limit values mandated in the Air Quality Standards Regulations. There are a number of local, existing air quality issues that would be made worse in the absence of progressing more sustainable surface access (which is provided for the Plan) and Air Quality Objectives AQ1 to AQ5. Air quality issues are likely to improve in the medium to longer term.

An increase in the frequency of noise emissions. This has been mitigated for new development by management techniques including by the application of Noise Zones. The extent of areas affected by varying noise ranges is shown on Figure 4.13. Areas where noise levels are highest are indicated by Noise Zone A. Various provisions have been integrated into the Plan and wider framework to ensure that noise levels at sensitive receptors will be minimised.

Risks remain due to uncertainty with regard to climate and interactions with issues including flooding and material assets. However, flood risk has been mitigated in compliance with relevant legislative requirements and areas identified as being at elevated levels of flood risk have been provided for appropriately.

- Table 10.1, insert additional sources as follows: The EPA-managed network of air quality monitoring stations (including in Fingal and Swords); Annual progress report relating to European Communities (Environmental Noise) Regulations 2018; and insert relevant monitoring frequencies.

In selected targets for Air and Climatic factors, replace the following text ~~100% increase in the number of people using sustainable transport modes (rail, bus, cycling walking) against current 2011 Travel to Work Modes. (target also linked to No. 3 PHH2 above)~~ with To increase the proportion of journeys to and from the airport that are taken on public transport or walked or cycled over the Plan period

Replace the following text ~~Percentage of new residential buildings granted planning with A3 or higher BER All new buildings to have an A3 or higher BER~~ with The 2nd Fingal Development Plan SEA Monitoring Indicator and Target under this SEO are not directly relevant to the Airport LAP area; no additional measures are required

Submission: Inland Fisheries Ireland (FIN-C239-151)

Summary of Comments

Surface Water Quality

- IFI refers to the Air Transport Movement Forecasts detailed in the DTTAS 2018 Review and notes that development, including amendment / enhancement of parking facilities for aircraft, stands, piers, boarding gates, and the expansion and enhancement of existing and new aprons cannot be considered without the provision of infrastructure in line with Best Available Technologies and International Best Practice in respect of the collection, treatment and disposal of surface water and trade effluent from the existing and planned development.
- IFI notes that there must be complete separation of the surface water and trade effluent systems. The current practice of diversion of the Cuckoo Stream during de-icing (App 4) is unacceptable and needs to be addressed.
- IFI requests that 2 no. additional objectives be included to protect water quality as follows:
 1. All discharges to surface water must be in compliance with the European Communities (Surface Water) Regulations 2009.
 2. All discharges to groundwater must be in compliance with the European Communities (Ground Water) Regulations 2010.

Flood Risk Assessment

- IFI notes that existing access roads and existing surface water car parks do not have any formal treatment prior to discharge. The attenuation and treatment of storm water from these existing areas and new development should be included within the provisions of the draft LAP.

Surface Water Management Plan Appendix 6

- IFI notes that while comprehensive in handling clean surface water through attenuation, SuDs technologies and generally managing Flood Risk, it doesn't include any objective in respect of water quality and this should be addressed.

Chief Executive's Response

Surface Water Quality

Surface water objectives within the draft LAP are considered to appropriately mitigate for impact from existing and future development at the Airport and will have commensurate benefits for water quality. It is considered that the objective relating to water quality in accordance with the Water Framework Directive could be strengthened to require that development comply with the WFD and to support compliance with the surface water regulations and ground water regulations respectively.

Flood Risk Assessment

The Dublin Airport LAP Strategic Flood Risk Assessment and Surface Water Management Plan looks at the entire local area plan lands, the current drainage arrangements and makes recommendations with regard to the future drainage arrangements on these lands i.e. both existing and new areas.

Surface Water Management Plan Appendix 6

The Surface Water Management Plan has been undertaken as part of the Flood Risk Assessment. It is noted that the SWMP sets out a requirement to undertake further analysis. This further analysis will aid assessment of planning applications. It is recommended that incorporating any further study and recommendations would allow implementation of relevant objectives for surface water improvement. It is noted that the further analysis is required by the Surface Water Management Plan which accompanies the draft LAP. No amendment is required.

Recommendation

Amend Text within Section 9.5 as follows;

'Future development should comply with the Dublin Airport Local Area Plan and Surface Water Management Plan objectives to ensure any impacts on water quality will be positive. All discharges to surface water and to ground water must support compliance with the European Communities European Objectives (Surface Waters) Regulations 2009 and with the European Communities (Groundwater) Regulations 2010 respectively, both of which give effect to the Water Framework Directive. Improvement of surface water quality is expected through implementation of SuDS Objectives.'

Amend Objective SWQ01 as follows;

'Applications for development shall demonstrate that they comply with the Water Framework Directive will not deteriorate the status of either surface or ground water bodies. Where appropriate, permissions shall be conditioned to require the developer to undertake actions in order to improve the status of water bodies, in line with the Water Framework Directive.'

Summary of Comments

Surface Access and Transport

- The HSE welcomes the objective for increasing the use of public transport to and from the Airport. In addition, the objectives detailed in the draft LAP support clean air and sustainability strategies. Specifically, the increased use of cycling and walking to access the Airport supports a number of health strategies such as 'A Healthy Weight for Ireland' and the 'Building Healthy Heart'. The common barriers to enable a shift from private car use to public transport from their experience are noted and are primarily centred around reliability, frequency and safety, followed by cost. The HSE contends that Metrolink is a vital part of the strategic aim to increase the use of public transport to access the Airport and should be prioritised in the immediate term.

Environment and Community

- The HSE makes reference to the Noise Action Plan which identifies a number of areas and receptors that are subject to noise exposure over the WHO Night Time Noise Guidance. It is highlighted that this is considered a health protection standard and identifies actions to reduce exposure to noise from airports. The HSE contends that the draft LAP should provide more clarity on how proposed infrastructure development will impact on the noise environment, particularly night time noise including the identification of proposed mitigation measures to reduce exposure to night time noise below the standards set to protect public health.

Air Quality

- It is further recommended that consideration shall be given to linkage to the ambient air quality network and in particular, the Air Quality Index for Health at: <http://www.epa.ie/air/quality/>

SEA

- The HSE makes reference to the EPA Guidance on SEA and Local Authority Plans and Policies: SEA of Local Authority Land-Use Plans-EPA Recommendations and Resources 2019 Version 1.4. <https://www.epa.ie/pubs/advice/ea/EPA%20SEA-LandUse-Recommendations-Guidance> 2019 pdf refers. Specifically, page 16 of the guidance is referred to which considers human health as part of the environmental objectives. The HSE contends that in the SEA, the consideration of Population and Human Health (pg.58) is limited to increasing the number of people working and living in Fingal and compliance with air quality standards and noise requirements as set out in the Dublin Noise Action Plan.
- It is further noted that the guidance on SEA with regards to Population and Human Health indicates that a much wider assessment should have been carried

out that included wider determinants of health and opportunities for population health gain. It is also recommended that the SEA could consider how the plan impacts on health inequalities and social inclusion.

- It is noted that there should be a mechanism for review of the LAP in the context of publication of a Clean Air Strategy or other relevant national strategy.
- Clarity is required regarding the sustainable transport target set out in Air and Climatic Factors – ACI page 59 of the SEA and specifically as it relates to the figures and percentages cited.

Chief Executive's Response

Surface Access and Transport

The draft LAP supports the delivery of Metrolink. Delivery of MetroLink is a strategic objective outside the scope of this LAP, FCC supports and will continue to work with NTA and TII and other stakeholders in its delivery.

Environment and Community

The draft LAP does not set out proposals relating to night time use of runways. Any proposals in this regard will require to be addressed by way of a planning application which shall address mitigation and, where relevant be subject to consideration by the Aircraft Noise Competent Authority. Proposed Variation No. 1 to the FDP sets out noise zones relating to potential future use of parallel runways at Dublin Airport in order to protect sensitive land use in the vicinity of the Airport thereby protecting future residents from noise impacts.

Air Quality

The Environmental Protection Agency's Air Quality Index for Health (AQIH) for the Dublin City Region is currently rated as Good. The attached link identifies the map outlining the AQIH for Ireland <http://www.epa.ie/air/quality/>. Objective AQ5 in the draft LAP relates to FCC and daa's reviewing air quality monitoring and that issues may be identified from continual monitoring undertaken which can inform planning applications and the development management process.

SEA

The EPA guidance document referred to has been considered in the preparation of the SEA Environmental Report and will be referenced throughout the LAP process, as relevant and appropriate to the draft LAP.

In relation to consideration of Population and Human Health, this is considered throughout the SEA Environmental Report (including at Section 4 "Environmental Baseline", Section 7 "Evaluation of Alternatives", Section 8 "Evaluation of Draft Plan Provisions", Section 9 "Mitigation Measures" and Section 10 "Monitoring Measures"). Section 8.4 of the Report identifies the "Interrelationship between Environmental Components", with interrelationships between "Population and Human Health" and the environmental components of "Soil", "Water", "Air and Climatic Factors", "Material Assets" and "Landscape" identified. Table 8.3 of the SEA Environmental Report provides

the overall findings of the assessment and identifies the significant positive effects, Potential Significant Adverse Effects, if unmitigated and Residual Adverse Significant Effects likely to occur with respect to "Population and Human Health" as a result of implementing the LAP, in combination with the wider planning framework (some of which may be considered health gain).

Health inequalities and social issues are not issues considered by Strategic Environmental Assessment. Human health issues considered by SEA are those with the potential to interact with impacts upon environmental vectors (i.e. environmental components such as air, water or soil through which contaminants or pollutants, which have the potential to cause harm, can be transported so that they come into contact with human beings). Hazards or nuisances to human health can arise as a result of exposure to these vectors, arising from incompatible adjacent land uses for example. These factors have been considered in the SEA with regard to the description of the baseline of each environmental component and the identification and evaluation of the likely significant environmental effects of implementing the LAP.

The Clean Air Strategy referred to does not yet exist however reference can be made to it as an emerging Strategy/Strategy in preparation in Appendix II to the SEA Environmental Report "Relationship with Legislation and Other Plans and Programmes". Target AC1 (which has been used at County level) is to be updated made more relevant to the LAP.

Recommendation

No change to draft LAP.

Amend SEA Environmental Report as follows:

- In selected targets for Air and Climatic factors AC1, replace the following text ~~10% increase in the number of people using sustainable transport modes (rail, bus, cycling walking) against current 2011 Travel to Work Modes. (target also linked to No. 3 PHH2 above)~~ with the following text: *To increase the proportion of journeys to and from the airport that are taken on public transport or walked or cycled over the Plan period*
- To make reference to the *The emerging Clean Air Strategy (currently being prepared)* in Appendix II to the SEA Environmental Report "Relationship with Legislation and Other Plans and Programmes".

Submission: Meath County Council (FIN-C239-5)

Summary of Comments

- Notes the increase lands within County Meath impacted by noise zones, in particular Zone B and Zone C and outlines Dunboyne's location within the

Metropolitan Area as identified in the RSES and its potential for future development.

- Identifies the location of rural areas in County Meath located within noise zones, these lands are within areas subject to rural generated housing policy.
- Refers to the potential for Ashbourne to provide for airport related business development due to its proximity to Dublin Airport.
- Meath County Council will take these issues into account in the review of the Meath County Development Plan which is currently underway.

Chief Executive's Response

The submission relates to noise zones set out in Proposed Variation No. 1 to the FDP. In this regard, it is noted that Zone B and Zone C do not propose any restrictions in terms of the quantity of development proposed, rather they propose mitigation measures relating to noise.

FCC recognises the location of Dunboyne within the MASP and the location of Ashbourne in proximity to Dublin Airport. It is considered that the proposed noise zones and any increase in passengers arising from growth at Dublin Airport as set out in the draft LAP will not impact on the growth potential of these areas. The potential of Ashbourne to provide for airport related business development is noted, this is a matter for Meath County Council to consider in any forthcoming planning policy in relation to this area. It is noted that the proposed noise zones are located outside of the area zoned for development in the town.

Recommendation

No change.

Submission: Department of Education and Skills (FIN-C239-34)

Summary of Comments

Confirmation of no comment to make.

Submission: daa (FIN-C239-152)

Due to the significant number of items raised within the daa submission, and the specific amendments sought to a large number of areas of text and policy within the draft LAP, it is considered to be in the interest of legibility to set out the issues raised and immediately below each issue, to provide the Chief Executive's response and recommendation.

Summary of Comments

daa Growth of the Airport

- daa requests an increase in the proposed passenger forecast growth of 40 mppa to a minimum provision of 45 mppa including 310,000 ATM's in the LAP to deliver

on the objectives set out in National Strategic Objective 6 relating to the provision of high quality international connectivity as set out in the NPF and the provisions of the National Aviation Policy. In particular, concern is expressed regarding the basis for passenger and ATM growth forecasts set out in the LAP namely the DTTAS 'Review of Future Capacity Needs of Ireland's State Airport's' which is considered too restrictive and not sufficiently detailed in the context of determining future growth forecasts.

- Recommends the following in relation to the growth of the Airport and specifically in the context of passenger growth given the capability of the existing eastern campus to cater for in excess of 40 mppa.

Page 48 delete the following: *'However, there are a number of key interventions that if implemented during the plan period will enable the capacity of the existing eastern campus to be maximised to 40 million passengers annually.'*

Replace with the following: However, there are a number of key interventions that if implemented will facilitate in excess of 45 million passengers annually on the eastern campus.'

Chief Executive's Response

The proposed forecast passenger growths are considered acceptable in terms of the timeframe of the LAP and the required infrastructure to cater for the associated future levels of demand for travel during that period. The analysis carried out to date in the preparation of this draft LAP and the supporting South Fingal Transport Study has identified the infrastructural measures that are required to cater for forecast passenger growth. To adopt a significantly higher figure of 45mppa would result in unsustainable impacts on the transportation network and would exceed the likely forecast capacity of the future transport network, an outcome that would be contrary to the proper planning and sustainable development not only of the LAP area but of the wider surrounding South Fingal area.

Recommendation

No change.

daa Third Terminal

- daa contend that any ambitions for a third terminal should not, through any provisions set out in the draft LAP, prejudice necessary investment in airport infrastructure. In this context, concern is expressed regarding objective EA3 of the draft plan as follows:
- daa have no objection in principle in safeguarding an area for a future third terminal, however, they contend that such safeguarding shall not prejudice the best use of existing airport infrastructure or be to the detriment of the orderly development of the airfield. In this context, Objective EA3 shall be amended to avoid any future investment proposals in airport infrastructure becoming restricted and requiring justification against proposals for an unknown or unjustified third terminal at an unspecified point in time.

Objective EA3 seeks that, *'All development proposals shall not prejudice the orderly operation and continued growth of the Airport including provision of a third terminal in the future.'*

- daa amendment to objective EA3 as follows:

'All development proposals shall not prejudice the orderly operation and continued growth of the Airport up to 45 mppa for the period of this Local Area Plan'

- In the context of the above, Objective TP3 is recommended by daa for deletion particularly as it relates to external studies that are strategic and complex in nature:

Objective TP3 seeks to, 'Support the detailed review of the three identified locations for a third terminal at Dublin Airport as set out in the Department of Transport, Tourism and Sport (DTTAS), 'Review of Future Capacity Needs at Ireland's State Airports', (August 2018) during the lifetime of this LAP with a view to identifying the most appropriate location.'

-Page 52, daa recommends the following for deletion specifically as terminal locations are designed to facilitate runway and airfield operations and in the absence of a policy position of a third terminal. 'The LAP is supportive of the provision of new apron areas, however it must be demonstrated that any new or extended apron locations will not prejudice the locations for a new third terminal as Set out in Section 5.4.2. of the DTTAS Review of Future Capacity Needs at Ireland's State Airports.'

Chief Executive's Response

The DA zone facilitates airport infrastructure. This includes the provision of a third terminal, where requirement for such a facility is demonstrated to accommodate passenger throughput. Three potential terminal locations are set out in the DTTAS Review (2018). It is considered appropriate to insert the supporting image from that document into the draft LAP. It is considered prudent to ensure that consideration is given to development proposals proximate to these locations to ensure avoidance of development which would make provision of a third terminal in the locations identified by DTTAS unsustainable.

The draft LAP includes objective TP3 which supports the detailed review of the three potential locations as set out in the DTTAS 'Review of Future Capacity Needs at Ireland's State Airports' (August 2018) to determine the optimum location for a third terminal. To delete objective TP3 would run contrary to the provisions of the government sponsored review which provides strategic direction at national level regarding the provision of a future third terminal at Dublin Airport.

Recommendation

Insert Figure 78 from DTTAS Review (2018) into Section 7.2.1 of the draft LAP.

daa Key Strategic Objectives

- daa recommends that the key strategic safeguarding objective set out in Chapter 4 of the draft LAP includes reference to 'positive' economic impact.

Chief Executives Response

The key strategic safeguarding objective set out in Chapter 4 of the draft LAP seeks to, 'Safeguard the current and future operational, safety, technical and development requirements of Dublin Airport and provide for its ongoing development within a sustainable development framework, having regard to both the environmental impact on local communities and the economic impact on businesses within the area'.

It is considered that the essence of the request is captured within the proposed strategic objective as set out in the draft LAP without explicit reference to same.

Recommendation: No change.

daa The Economic Impact of Dublin Airport

- daa recommends the following objective ED2 be deleted as follows:

Objective ED2 'In order to protect the core aviation function of Dublin Airport, no further non-air transport related office development shall be permitted at the HT lands within the Airport until such time as required roads infrastructure is in place and public and sustainable transport such as the Swords CBC and Metrolink are operational. Any planning application for further phases of development at Dublin Airport Central shall be accompanied by a traffic impact assessment of the impact of development on core airport function.'

daa recommended replacement as follows:

Objective ED2 'In order to sustainably plan for growth, development of the existing HT-zoned lands within the Airport shall be planned having regard to the planned Swords CBC and Metrolink. Any planning application for further phases of development at Dublin Airport Central shall be accompanied by a traffic impact assessment of the impact of development on core airport function.'

Chief Executives Response

The draft LAP seeks to protect the core aviation function of Dublin Airport in line with National policy. The submissions of the Office of the Planning Regulator, NTA and TII in relation to the need to strengthen Objective ED2 and link it with the objectives contained in Chapter 8 are noted here and it is not considered appropriate to amend Objective ED2 as proposed.

Furthermore, given the existing and future likely constraints on the local transportation network, the core function of the Airport could be compromised to adopt such an approach to provide for additional office development in the absence of transport infrastructure identified.

Recommendation

No change.

daa Airport Infrastructure

- daa recommends that the definition of apron infrastructure as set out in Chapter 3 page 24 of the draft LAP be replaced with the European Aviation Safety Agency [EASA] apron definition.

Chief Executives Response

The proposed apron definition is noted and the draft LAP will be amended in this regard to include the EASA definition relating to apron infrastructure.

Recommendation

Delete the following in Section 3.2.1.3 Apron as follows: ~~The apron is the area between the runways/taxiways and terminal gates and where aircraft are parked, unloaded or loaded, refuelled, or boarded.~~

Replace with the following:

Section 3.2.1.3 *'Apron means a defined area intended to accommodate aircraft for purposes of loading or unloading passengers, mail or cargo, fuelling, parking, or maintenance.'*

daa Air Quality

- daa requests that objective AQ5 be amended as other sources will influence air quality in the vicinity of the Airport.

Objective AQ5 seeks to, 'Undertake a review of existing air quality monitoring (and associated appropriate remedial action in the case of breaches) within and surrounding the Airport (including changes in Particulate Matter (PM) at relevant locations). Where relevant, such a review should identify additional monitoring proposals, remedial actions and implementation systems-such needs shall be provide by Fingal County Council and /or daa.'

Chief Executives Response

Compliance with this objective should be an ongoing commitment to continued compliance with the CAFE (Clean Air for Europe) Directive and EU legal limits and to work towards compliance with WHO guidance. The Clean Air for Europe programme (CAFE) was launched in March 2001 with the aim to develop long-term, strategic and integrated policy advice to protect against significant negative effects of air pollution on human health and the environment. A National Clean Air Strategy is currently being developed and Fingal County Council will review this document upon release with a view to updating strategies. The provision of additional monitoring will require a financial commitment.

<https://ec.europa.eu/environment/archives/cafe/>

Dublin Airport Air Quality Monitoring Report 2019 should be taken into consideration. Air Quality monitoring is conducted by the daa at a number of external monitoring locations in the vicinity of the Airport in conjunction with the EPA.

Parameters recorded include:

Sulphur dioxide (SO₂)

Oxides of nitrogen NO_x (NO and NO₂)

Carbon monoxide (CO)

Ozone (O₃)

Particulate Matter (PM₁₀)

PM 2.5 is not currently recorded as a requirement of planning permissions at the Airport. It is considered that the review of air quality monitoring at the Airport as set out in AQ05 would facilitate discussion on parameters to be included, in discussion with stakeholders, including daa and the EPA.

Recommendation

No change.

daa Operational Safeguarding

- daa recommends that Objective OS1 be amended to include reference to Dublin Airport. Objective OS1 seeks to, *'Control the type and height of any structures that may be developed in the environs of the Airport (in consultation with the Irish Aviation Authority in accordance with the Obstacle Limitation Requirements of Regulation (EU) No 139/2014 (EASA Certification Specifications), previously required under ICAO Annex 14 and which are depicted on the aerodrome operator's safeguarding map.'*

Chief Executives Response

It is considered appropriate to amend this objective to ensure consistency with a similar objective contained in Proposed Variation No. 1 to the FDP. It is noted that Article 28 of the Planning and Development Regulations 2001 (as amended) set out a requirement to send notice of planning applications to certain bodies. Article 28 (1) (i) provides for referral to the airport operator where it appears to the authority that the development might interfere with the operation and development of a licensed airport, whose annual traffic is not less than 1 million passenger movements which in this case is daa.

Recommendation

Amend Objective OS1 as follows:

Control the type and height of any structures that may be developed in the environs of the Airport (in consultation with the Irish Aviation Authority and *Dublin Airport* in accordance with the Obstacle Limitation Requirements of Regulation (EU) No 139/2014 (EASA Certification Specifications), previously required under ICAO Annex 14 and which are depicted on the aerodrome operator's safeguarding map.'

daa Built Heritage

- daa requests a number of changes regarding built heritage within the draft LAP as follows:
 - The following new objective relating to the protection of archaeological heritage shall be included in the LAP:
Objective AR4 'Require the recording and or removal of archaeological remains where preservation in situ is not practical, and the recording of, and or relocation would yield greater benefit at a new location (eg. Museum or location which is publicly accessible).'
 - Delete the following on page 70 as follows: *'Three of the structures (1937 Terminal Building, Castlemoate House, and the Church of Our Lady Queen of Heaven) are in the ownership of daa and are located within the current airport campus.'* and
Replace with the following:
'Two of the structures (1937 Terminal Building, Castlemoate House) are in the ownership of daa and are located within the current airport campus. It is noted that the Church of Our Lady Queen of Heaven is in the ownership of the Archdiocese of Dublin.
 - Delete Objective AH1 *'Have particular regard to the conservation and protection of the 1937 Old Central Terminal Building and its setting.'*
And replace with the following:
Objective AH1 'Have particular regard to the conservation and protection of the 1937 Old Central Terminal Building and its setting whilst acknowledging the location of this building within a live airport environment adjacent to apron operation'.

Chief Executives Response

The provision for preservation by record is contained with Objective AR2. The addition of a new objective is considered unnecessary as provision for preservation by record already exists within the stated objectives.

The ownership of the Church of Our Lady Queen of Heaven is noted and the draft LAP will be amended in this regard. In the interests of clarity the existing church is in the ownership of the St. Laurence O'Toole Trust which is the body for the Dublin Archdiocese.

The Local Authority including the Conservation Office has always been cognisant of the location of the Old Central Terminal building within a busy and expanding airport. Various planning applications have been granted for works in the vicinity and also directly to the original terminal that have enabled the expansion of the Airport while protecting the significance of this structure. It is also noted that Objective AH2 already makes reference to conservation of architectural heritage being consistent with development of necessary airport facilities. In this regard, there is no requirement to restate this in objective AH1.

Recommendation

Delete Section 9.8.2 Architectural Heritage as follows: ~~‘Three of the structures (1937 Terminal Building, Castlemoate House, and the Church of Our Lady Queen of Heaven) are in the ownership of daa and are located within the current airport campus.’~~

Replace with the following:

Section 9.8.2 Architectural Heritage as follows: *‘Two of the structures (1937 Terminal Building and Castlemoate House) are in the ownership of daa while the Church of Our Lady Queen of Heaven is in the ownership of the St. Laurence O’Toole Trust. These structures are located within the Airport campus.’*

daa Design

- The daa requests specific changes relating to policy and objectives relating to ‘Design Quality’ within the LAP as follows:

-page 29 Delete on the basis that acknowledgement is given to the functional aspect of the passenger interface between pier buildings and apron areas as follows. *‘Promote exemplar design and the creation of a high-quality environment to reflect Dublin Airport’s status as an international gateway airport.’* and

daa recommended replacement with the following:

‘Promote exemplar design and the creation of a high-quality environment to the passenger facing aspects of the terminal buildings.’

-Delete objective DS1 as follows:

‘Ensure that all development at Dublin Airport will be of high quality design and finishes to reflect Dublin Airport’s status as an international gateway airport’.

daa recommended replacement with the following:

‘Ensure that key landside arrival and department points at Dublin Airport will be of high quality design and finishes to reflect Dublin Airport’s status as an international gateway airport accepting that the airside passenger interface point between buildings and aircraft may of necessity be more functional in nature.’

- Delete Objective DS5 as follows:

‘Encourage sustainable development through energy end use efficiency and increasing the use of renewable energy in all extensions and new buildings by requiring the following criteria be applied to ensure design and assembly of low-energy buildings:

i. Responsible environmental management in construction;

ii. A menu of superior design and specification towards sustainable construction Options to include the following:

iii. Site layout and associated bio-climatic/ passive solar design measures

iv. Use of daylight where to reduce energy consumption

v. Use of healthy and controllable ventilation systems

vi. Use of heat recovery systems including Combined Heat and Power

- vii. Promotion of water conservation measures*
- viii. Use of building materials with lower embodied energy use in manufacture*
- ix. Use of lower energy efficient lighting systems*
- x. Incorporation of renewable energy systems, e.g. active solar, heat pumps, etc in all buildings*
- xi. Optimising the use of Building Energy Management Systems*
- xii. Use of Monitoring and Targeting systems to monitor best practice in energy consumption towards reducing CO2 emissions to the greatest extent practicable. A statement of consistency shall be required to be submitted with all planning applications for extensions and new buildings indicating measures proposed to comply with i – xii.'*

daa recommended replacement with the following:

Objective DS5 Encourage sustainable development through energy end use efficiency and increasing the use of renewable energy in all extensions and new buildings' The omission of references i to xii within objective DS5 is required on the basis of reference to the provisions of Building Control which are not provided for in planning legislation.'

Chief Executive's Response

The draft plan at Chapter 7 Airport Infrastructure and specifically Section 7.7 Design Quality is explicit in the recognition of Dublin Airport's international gateway status and the need for exemplar design and the creation of a high quality environment which enriches visitor experiences. The draft LAP acknowledges that a high standard of design provides the opportunity to make a statement of civic pride and create a sense of place that is specifically Irish for visitors and citizens as they arrive or depart through our principal gateway. In order to ensure a consistent approach to built form and materials within airport projects, it is a requirement of the draft LAP through objective DS2 that the daa establish design principles as part of an overall design framework to be utilised for differing types of projects within the Airport lands. This will facilitate difference in design, while ensuring a consistent presentation of design theme representing the gateway status of the Airport. These guidelines will form the basis for appropriate and a co-ordinated design approach for all airport infrastructure and will guide all airport infrastructure related development proposals. In this context, objective DS1 and related provisions in the draft LAP which promotes exemplar design and the creation of a high-quality environment to reflect Dublin Airport's status as an international gateway airport is considered critical to ensure the creation of a high quality environment for this primary gateway to Ireland.

The draft LAP emphasises a greater shift towards the integration of low carbon and energy efficient technologies across airport buildings and operations to enable Dublin Airport to develop as an energy efficient hub. A key strategic aim of the draft LAP seeks to promote innovative, carbon reducing, energy efficient and renewable energy technologies in building design. In addition, Chapter 5 Transition to a Low Carbon Economy requires that future development at Dublin Airport demonstrate the integration of renewables-focused energy generation systems to support a reduction in greenhouse gas emissions and the Airport's carbon footprint through development

proposals. The draft LAP also includes a number of additional objectives towards the achievement of a low carbon economy. Specifically, objective DS5 seeks to encourage sustainable development through energy end use efficiency and increasing the use of renewable energy in all extensions and new buildings by requiring compliance with specific energy efficient criteria to ensure design and assembly of low-energy buildings. In this regard, objective DS5 and associated required criteria is considered critical in the context of the achievement of key strategic aims and objectives of the draft LAP towards the achievement of a low carbon economy.

Recommendation

No change.

daa Variation No. 1 to the FDP

- Submission includes daa's submission to proposed Variation No. 1 to the FDP which seeks inclusion in the proposed Variation relating to Dublin Airport's role as a national strategic infrastructure asset, inclusion of reference to the RSES in relation to noise policy and suggested amendments to policy guidance in relation to noise sensitive development.

Chief Executive's Response

The contents of the submission relating to proposed Variation No. 1 are noted.

Recommendation

No change.

daa Surface Access and Transport

HT and Office

That the LAP provide for a holistic approach to growth with respect to surface access. The LAP should address all key areas within its development boundary, including the re-development of existing High Technology zoned brownfield sites and also take account of emerging profiles in aviation growth, including that of transfer passengers which do not impact surface access. Sufficient and integrated provision should be made for passengers, staff, logistics and car hire which all perform essential functions.

It is requested that provision be included to allow review/consideration for application(s) for additional office development to be made within the LAP period notwithstanding that MetroLink completion dates and, therefore, conditions more conducive to permitting that expansion will then exist. Requests that the matter be re-considered to allow for an integrated approach to surface access demand and supply at Dublin Airport.

Chief Executives Response

The draft LAP seeks to protect the core aviation function of Dublin Airport in line with National policy. The submissions of the Office of the Planning Regulator, NTA and TII in relation to the need to strengthen Objective ED2 and link it with the objectives

contained in Chapter 8 are noted here and it is not considered appropriate to amend Objective ED2 as proposed.

Furthermore, given the existing and future likely constraints on the local transportation network, the core function of the airport could be compromised to adopt such an approach to provide for additional office development in the absence of transport infrastructure identified.

Recommendation

No change.

Key Text/Policy/Objectives- Areas for Clarification relating to Surface Access and Transport

External Road Network Objective

- Objective EA1 seeks to *“Maintain and protect accessibility to Dublin Airport as a priority and provide for alternative access points to the road network in line with the recommendations of the South Fingal Transport Study.”*

daa seeks to amend objective EA1 as follows:

“Maintain and protect accessibility to Dublin Airport as a priority and to examine any demand requirement for alternative access points to the airport, in the context of an ongoing modal shift at Dublin Airport and provide for alternative access points to the road network in line with the recommendations of the South Fingal Transport Study.”

Chief Executives Response

No change proposed. The provision of alternative access points will inherently be based on demand factors such as modal shift and other related factors. Any access points will be provided if identified as required under existing LAP objectives, including objective SF02 whereby assessment and modelling will identify any such need.

Recommendation

No change.

External Road Network Objective

- Objective EA2 seeks to, *‘Ensure that the transport network, including road infrastructure, has the capacity to better arrange traffic in the vicinity of Dublin Airport and to cater for the estimated growth in traffic into the future. This includes the upgrade of the Airport Roundabout to increase capacity, potentially through grade separation, as part of the first proposal to increase surface access passengers, where it cannot be demonstrated that public transport provision would satisfy travel demand.*

daa seeks to amend objective EA2 as follows:

“Ensure that the transport network, including road infrastructure, has the capacity to better arrange traffic in the vicinity of Dublin Airport and to cater for the estimated growth in traffic into the future. This includes the upgrade of the

Airport Roundabout to increase capacity, if required potentially through grade separation, as part of proposals to increase surface access, where it cannot be demonstrated that public transport provision would satisfy travel demand.”

Chief Executives Response

No change proposed. The South Fingal Transport Study indicated that the provision of additional capacity at Dublin Airport Roundabout should be an objective of the draft LAP as it has been identified as a critical point on the network that is operating close to capacity. It is also likely to undergo changes in capacity as a result of the Swords Road Core Bus Corridor. Any upgrade is predicated, as set out in objective EA2, on the basis of public transport provision not being capable of meeting demand.

Recommendation

No change.

Airport Staff Car Parking

- daa seeks the following new policy in the context of staff parking areas in the draft LAP:

‘To support the examination of streamlined staff parking areas to service the campus as a whole such that improved shuttling services may be employed between the car parks and staff locations.’

Chief Executives Response

The need to support streamlining / efficiencies in staff car parking areas is recognised. It is considered that this would be provided for under objective SF02 as part of any Mobility Management Plan proposed and as such it is not considered necessary to amend the draft LAP in this regard.

Recommendation

No change.

Improvements To The External Road Network

- daa seeks that that Section 8.2.3 ‘Improvements To The External Road Network’ be amended to include reference to the east in the context of existing and future car parking facilities.

The specific policy outlined at Pg. 60 seeks to *‘Provide appropriate levels of bus priority to serve existing and proposed long-term car parking facilities to the south and west of the Airport campus, to be considered in the context of the need to cater for higher frequency bus services on the proposed R132 Swords Road Core Bus Corridor, and this will require careful consideration in any future scheme proposals.’*

Chief Executives Response

It is considered appropriate to remove locations which are overly specific, update objective to remove reference to south and west of the Airport campus.

Recommendation

That Section 8.2.3 'Improvements To The External Road Network' be amended and to read as follows:

'Provide appropriate levels of bus priority to serve existing and proposed long-term car parking facilities ~~to the south and west of the Airport Campus~~ to be considered in the context of the need to cater for higher frequency bus services on the proposed R132 Swords Road Core Bus Corridor, and this will require careful consideration in any future scheme proposals.'

Improvements To The External Road Network

- daa seeks that Section 8.2.3 'Improvements To The External Road Network' be amended to remove policy from pg. 60 as follows: *'In the medium-term an Airport Western Access route serving Dublin Airport from the M2/N2 corridor would cater for significant forecast passenger levels and offer contingency planning for the use of the key M50/M1 transport infrastructure. A Western Access is recommended in the context of provision of additional long-term parking facilities expansion in the west, regardless of where any possible future third terminal is provided. In the context of future parking expansion at Dublin Airport, the Western Access would provide access to the car parks only, with the final leg of the trip, i.e. from the car parks to the terminal building, being completed by shuttle bus thereby improving public transport outcomes in terms of access to the Airport. Whilst this objective is required in the medium-term, concept and feasibility design assessments should commence in the short-term, given the timeframes required for the delivery of this scale of infrastructure project.'*

daa recommended replacement as follows: 'Continued cooperation with the transport and airport authorities will be maintained to facilitate access for both staff and airport users from the surrounding road network and in the wider regional context so as to promote sustainable travel models for airport access and use.'

daa seeks amendment to objective EA5 as follows.

Objective EA5 seeks to, *'Provide for a Western Access route to Dublin Airport from the N2 corridor, with consideration being given to the future capacity requirements and development layout of Dublin Airport.'*

daa recommended amendment to objective EA5 as follows:

'Examine the requirement for a Western Access route to Dublin Airport from the N2 corridor, with consideration being given to the future capacity requirements and development layout of Dublin Airport.'

Chief Executives Response

It is considered reasonable to pursue the objective of providing a Western Access to the Airport given its objective as a policy at national, regional and local level, (a western access to Dublin Airport is supported in the National Planning Framework and the RSES for the Eastern and Midlands Region and is specifically provided for in the 2017 FDP in Objective Swords 13 and in Table 7.1 'East West Distributor Road: Stockhole Lane to Cherryhound) alongside the analysis undertaken as part of the South Fingal Transport Study which indicates that a Western Access is likely to be required in the medium term. Given the likely scale of such a project, it will take a number of years to develop and will be subject to continuing and ongoing review as to the likely benefits to arise in terms of the overall transport network including sustainable modes.

In the context of the existing identified need for a western access it is considered appropriate to retain text on pg. 60 and Objective EA5 as set out in the draft LAP.

Recommendation

No change.

External Road Network Objective

- Objective EA6 seeks to: *'Facilitate the delivery of the R132 Swords Road Core Bus Corridor and to seek its prioritisation as a scheme of strategic national importance in enabling sustainable growth of Dublin Airport in the short-term and in advance of MetroLink.'*

daa seeks to amend Objective EA6 as follows:

'Facilitate the delivery of the R132 Swords Road Core Bus Corridor and to seek its prioritisation as a scheme of strategic national importance in enabling sustainable growth at Dublin Airport.

- daa also request that PT4, a repeat objective is also amended in this regard.

Chief Executives Response

It is appropriate for Fingal County Council to seek the prioritisation of the Swords Road Core Bus Corridor given its implementation is considered to be of a more straightforward nature than other Core Bus Corridors being proposed as part of the Bus Connects programme. It is proposed to remove 'in advance of Metro Link' from this objective having regard to nature of both projects and the likelihood of delivery of the CBC in the shorter term.

Recommendation

Amend objective EA 6 and Objective PT4 as follows:

'Facilitate the delivery of the R132 Swords Road Core Bus Corridor and to seek its prioritisation as a scheme of strategic national importance in enabling sustainable growth of Dublin Airport in the short-term ~~and in advance of MetroLink.~~

Public Transport Objective

- Objective PT 2 seeks to, *'Require the development of a transport interchange including a MetroLink station at the centre of the Dublin Airport campus, in accordance with the implementation of MetroLink by 2027 by the National Transport Authority and Transport Infrastructure Ireland.'*

daa seeks to amend Objective PT2 as follows:

'Facilitate the development of a transport interchange including a MetroLink station at the centre of the Dublin Airport campus, in accordance with the implementation of MetroLink by 2027 by the National Transport Authority and Transport Infrastructure Ireland.'

Chief Executives Response

Whilst the delivery of MetroLink is a strategic objective outside the scope of this LAP, the requirement for a high quality transport interchange to serve MetroLink and other transport mode users is considered appropriate.

Recommendation

No change.

Public Transport Objective

- Objective PT5 seeks to: *'Facilitate the development of bus priority facilities from the western side of the Dublin Airport campus to the terminal buildings, as a means of easing congestion on the existing road network. This will include the facilitation of car parking facilities on the western periphery and the implementation of bus priority facilities as needed, such as on the Collinstown Lane approach to the R132 Swords Road.'*

daa seeks to amend Objective PT5 as follows:

'Examine the development of bus priority facilities from the western side of the Dublin Airport campus to the terminal buildings, as a means of easing congestion on the existing road network. This will include the facilitation of car parking facilities on the western periphery and the implementation of bus priority facilities as needed, such as on the Collinstown Lane approach to the R132 Swords Road.'

Chief Executives Response

The need for a Western access and provision of parking with access to the eastern campus has been identified as a requirement to facilitate growth in light of capacity constraints at the eastern campus. It is therefore considered appropriate that bus priority facilities be provided in order to improve reliability of journey times from the west of the campus to the eastern side. As part of the process of facilitating the development of any western parking proposals, the beneficial impact of the proposals will inherently be examined in the context of bus services and other criteria such as environmental impact and economic feasibility.

Recommendation

No change

Public Transport Objective

- Objective PT6 seeks to *'Investigate and provide for connections from the western parts of the airport campus to MetroLink, in the context of potential future planned development to the west of the existing terminals'*.

daa requests that objective PT6 be deleted in the context of being premature / prejudicial in the absence of any proposal for a terminal in the west and in the absence of any appropriate environmental assessment that may be necessary in that context.

Chief Executives Response

There is potential for development on the western side of the Airport campus, as well as potential future car parking serviced by a future Western Access. Accordingly, it is appropriate for the use of MetroLink to be maximised in this regard,

Recommendation

No change.

Airport Based Commercial Development

- daa requests that Section 8.4.5 Airport Based Commercial Development be amended. This section states that, *'Having regard to this requirement and the contents of National Strategic Outcome 6 within the NPF, any plans for further phases of development at DAC should only be considered after delivery of specific road network and public transport improvements, including the operation of the Swords CBC and Metrolink.'*

daa recommended amendment as follows:

'Having regard to this requirement and the contents of National Strategic Outcome 6 within the NPF, any plans for further phases of development at DAC should be considered in conjunction with the planned delivery of specific road network and public transport improvements, including the operation of the Swords CBC and Metrolink.'

Chief Executives Response

The draft LAP seeks to protect the core aviation function of Dublin Airport in line with National policy. The submissions of the Office of the Planning Regulator, NTA and TII in relation to the need to strengthen Objective ED2 and link it with the objectives contained in Chapter 8 are noted here and it is not considered appropriate to amend this section of the draft LAP as proposed. Furthermore, given the existing and future likely constraints on the local transportation network, the core function of the airport could be compromised to provide for additional office development until such time as required transport network capacity is in place in line with objective ED2 and Chapter 8 of the draft LAP.

Recommendation

No change.

Internal Access Measures

- daa requests that Section 8.4.6 within Internal Access Measure where it relates to the use of the Dublin Airport taxi rank controlled by means of a permit system operated by daa be deleted. The removal of this policy is sought within this section as the management of taxis at Dublin Airport is an operational matter.

The relevant Section 8.4.6 section states that, *'The use of the Dublin Airport taxi rank is controlled by means of a permit system operated by daa. This inherently reduces the number of taxis by placing an additional restriction on use, thereby reducing the number of taxis available at, in particular, peak flight arrival periods.'*

Chief Executives Response

The comments are noted and it is considered appropriate to amend text.

Recommendation

Amend 8.4.6 as follows:

The use of the Dublin Airport taxi rank is controlled by means of a permit system operated by daa. This ~~inherently~~ *appears to* reduces the number of taxis by placing an additional restriction on use, thereby possibly reducing the number of taxis by placing an additional restriction on use.

Internal Access Measure

- daa requests that the Section 8.4.6 within Internal Access Measure be amended relating to the 'Link between Terminals and Western Airport Campus'. The relevant section states the following, *'Link between Terminals and Western Airport Campus: Support all relevant stakeholders in investigating the need for a high capacity link between the existing eastern campus, car parks and logistics facilities and potential future developments in the western campus.'*

daa recommended amendment as follows:

'Link between Terminals and Western Airport Campus: Support all relevant stakeholders in investigating the need for a high capacity link between the existing eastern campus, car parks and logistics facilities and potential future developments in the western campus if required.'

Chief Executives Response

The need for such linkages will inherently only be provided if they are found to be required.

Recommendation

No change.

Internal Access Objectives

- daa seeks the removal of objective IA4 on the basis of being outside the remit of the draft LAP.

Objective IA4 seeks to, *'Work with all stakeholders to identify the most appropriate regime for the efficient operation of taxi services including the management of any permit system and the identification of future dedicated taxi routes within the campus.'*

Chief Executives Response

Whilst it is accepted that the day-to-day operation of taxi services within the Airport campus is outside the remit of this LAP, the impact of taxis on local traffic and the interaction of taxi access arrangements with the external and internal road network is considered fundamental to the provision of an overall high level of service and for taxi operators and end users. It is appropriate, therefore, for Fingal County Council to work with all stakeholders in this regard.

Recommendation

No change

Car Parking Facilities

- daa requests that Section 8.6.1 relating to Car parking facilities be amended where it provides the number of short term car parking spaces. Specifically Section 8.6.1 states the following: *'In total there are around 3,400 short-term spaces available to passengers.'*

daa recommended amendment as follows:

'In total there are around 5,000 short term spaces available to passengers.'

Chief Executives Response

Amend draft LAP text to remove reference to 3,400 short term spaces.

Recommendation

Amend Section 8.6.1 Short Term Air Passenger Car Parks as follows:

Delete ~~*'In total there are around 3,400 short-term spaces available to passengers.'*~~

Car Parking Facilities

- daa refers to the following statement as set out in Section 8.6.1 Short Term Air Passenger Car Parks as follows: *'The provision of park and ride outside the DA zoning could be considered as part of an overall parking strategy'*. daa requests that this statement needs to reflect earlier statements with respect to an overall mobility plan on daa lands. Car parks outside the remit of daa cannot be mobility managed by daa.

Chief Executives Response

Agree to amendment.

Recommendation

Amend Section 8.6.1 Short Term Air Passenger Car Parks as follows: 'The provision of park and ride outside the DA zoning could be considered as part of an overall parking strategy *noting that this would need more detailed consideration in terms of how such a measure would be managed within any overall Dublin Airport Mobility Management Plan.*'

daa Surface Water and Flood Risk Management

daa notes that Dublin Airport is currently undertaking a comprehensive review of existing surface water management at the Airport with a view to implementing a long-term strategy. daa requests that Objective FRM03 relating to flood risk management be amended to have regard to the ongoing studies relating to surface water at Dublin Airport as more current information will become available, providing for most up to date information for the LAP and other related studies.

Chief Executives Response

The ongoing studies by daa will include important information on the surface water management system and flood risk for daa lands. This information is currently not available and is unlikely to be available prior to the adoption of the Dublin Airport LAP. Further studies are required as part of the Surface Water Management Plan prepared as part of the draft LAP and these will be taken into account as and when they become available.

Recommendation

No change.

The following Surface Water Management clarifications are required by daa:

The contents of the Strategic Flood Risk Assessment and Surface Water Management Plan (Appendix 6) are noted. Reference is made to Section 6.2 and specifically '*known flooding issues*'. In this regard, it is noted that some of the proposals included require a detailed examination of the wider hydrology of the area, which is likely to be beyond the scope of the proposed LAP. It is also noted that no evidence has been provided in respect of flooding sources and clarity should be provided in these documents.

Chief Executives Response

Section 6.2 of the Strategic Flood Risk Assessment and Surface Water Management Plan is essentially referring to more detailed analysis of the storm water system. This will partially be delivered by the daa study that is yet to be published. When referring to flood events, the document shall be amended to refer to the sources which are principally CFRAM.

Recommendation

Amend paragraph 3 in Section 6.2 of the Strategic Flood Risk Assessment and Surface Water Management Plan (Appendix 6) as follows:

'Whereas, it is not part of the current brief, the daa should review the performance of all stormwater infrastructure, both within the subject study area and also the receiving watercourses downstream. JBA understands that there are ongoing surface water management studies a Drainage Masterplan is currently being written conducted by a third party consultant for the daa. The ongoing studies will include important information on the surface water management system and flood risk for daa lands. This information is currently not available and is unlikely to be available prior to the adoption of the Dublin Airport LAP. Any subsequent updated relevant information regarding drainage or flooding that becomes available post adoption of the LAP will be considered at that time. As there are known flooding issues areas of predicted flooding downstream of Dublin Airport (as referenced by the CFRAM flood mapping), there is an opportunity to potentially reduce both the rate and volume of stormwater from the Airport lands which would be advantageous for all concerned.'

Surface Water Objectives

- It is noted that that Dublin Airport implements SuDs principles in new developments and an extensive programme of retrospective attenuation was implemented at the Airport, which may have been overlooked through the inclusion of Objectives SW03 and SW08.

Chief Executives Response

Objectives SW03 and SW08 were prepared in the knowledge that attenuation measures have been implemented at the airport in recent years.

Recommendation

No change.

Strategic Flood Risk Assessment and Surface Water Management Plan

- daa submission sets out recommendations relating to the Strategic Flood Risk Assessment and Surface Water Management Plan (Appendix 6) as follows: Specifically, amendment to Section 6.4 is requested. This section refers to retrofitting of SuDs and the removal of the following statement '*should be possible without much disruption to airport operations*' is requested on the basis that any airfield construction works, particularly those in the vicinity of active runways may cause significant impacts.

Chief Executives Response

Amend Section 6.4.

Recommendation

Amend Section 6.4 Surface Water Management Strategy within Appendix 6 as follows: 'Fingal Co Council / daa should also look to retro-fit SuDS where feasible, to':

Strategic Flood Risk Assessment and Surface Water Management Plan

- It is noted that some of the areas highlighted in the Strategic Flood Risk Assessment and Surface Water Management Plan and specifically Fig 5-1 from the pluvial mapping and shown as liable to flooding are outside of daa control

and are upstream of daa infrastructure. Amendments to these areas would require careful consideration of the impact on downstream (daa) infrastructure. It is noted that the first location (page 28) is in the north-west extents of the LAP area, near Dunbro Lane, and is currently undeveloped. The final comment '*investigate need to replace or upsize some existing road crossings particularly at Location A*' is an example of one such retrofitting location outside of daa control. A proposal to increase pipe sizes to alleviate this flooding would need to be considered and developed in consultation with Dublin Airport and any impacts of this proposal are not clear. In the absence of such, Dublin Airport does not recommend the adoption of this proposal.

Chief Executives Response

It is clarified that any adjustment to the pipe sizing would need to be accompanied by a suitably detailed Flood Risk Assessment in accordance with FRM04 of the LAP. This will ensure that there is no increased risk to third parties. daa would be free to make a submission under a planning application.

Recommendation

Insert the following at the end of the third and sixth bullet point at page 28 of the Strategic Flood Risk Assessment and Surface Water Management Plan (Appendix 6) as follows:

'Evidence provided by FCC after consultation with local residents'

'Any adjustment to the pipe sizing would need to be accompanied by a suitably detailed FRA'

Strategic Flood Risk Assessment and Surface Water Management Plan

- Similarly, the final location (page 30 – Area A) refers to local flooding predicted in the area. The majority of the predicted flood zones are within the Airport Business Park, which is not in the ownership of daa. As with the previous location, any retrospective mitigation in this area would require careful consideration to avoid negative impacts downstream in the Express Red Car Park or M1 motorway.

Chief Executives Response

FRM04 and SW01-09 will require that development does not increase flood risk elsewhere.

Recommendation

No change.

Surface Water Objectives

- SuDs objectives (SW01-SW09) are referenced by daa. However, it is noted that the unique nature of the Airport must be taken into account in the consideration of any SuDs proposals, including any risk that may arise for public safety in terms

of bird strike. Concerns are raised in relation to some measures identified in Section 6.4 of the Strategic Flood Risk Assessment and Surface Water Management Plan and requests that the LAP include an over-riding objective that any SUDs or surface water management proposals must be consistent with minimising the risk of a bird strike.

Chief Executives Response

The aim of the Strategic Flood Risk Assessment and Surface Water Management Plan prepared by JBA Consulting Engineers and Scientists on behalf of Fingal County Council is to not increase, but reduce the risk of bird strike and this is reflected within the document, particularly within Objective SW06 which seeks to, 'Reduce risk of bird strike when developing new sites and implementing SuDs measures.'

Recommendation

No change.

Strategic Flood Risk Assessment and Surface Water Management Plan

- Section 6.6.2 of the Strategic Flood Risk Assessment and Surface Water Management Plan refers to drain down times of attenuation and the probability of subsequent storm events requiring consideration. This section also refers to the consideration of infiltration in attenuation design to reduce volumes. These factors require to be further defined to ensure consistency of approach for developers. Further clarity is required with regards to rainfall events and subsequent attenuation volumes in order to meet statements such as, "*the probability of subsequent storms, whereby, the storage facilities will not have emptied completely prior to the onset of further rainfall,*" outlined within this section.

Chief Executives Response

This level of detail is to be assessed at detailed design stage and will consider the probability of successive rainfall events.

Recommendation

No change.

Strategic Flood Risk Assessment and Surface Water Management Plan

- Clarity is sought regarding the statement in Section 6.2 that '*Volume reduction can easily be attained through the introduction of the SUDS Management Train.*'

Chief Executives Response

Volume reduction is not reliant on infiltration techniques. Volume reduction is also possible through evaporation, transpiration, re-use via green roofs, rainwater

harvesting etc. The extent of volume reduction is dependent on the SuDS measures put forward at the detailed design stage.

Recommendation

No change.

Strategic Flood Risk Assessment and Surface Water Management Plan

- The submission notes that discharge rates envisaged need to be fully supported by an evidence base and be determined in accordance with the GSDSDS and that singular use of runoff rates should be avoided.

Chief Executives Response

Discharge rate to be in accordance with the GSDSDS and as outlined within the draft LAP

Recommendation

No change

Flood Risk Management

- Objective FRM03 seeks to: *'Have regard to the Planning System and Flood Risk Management Guidelines for Planning Authorities (DoEHLG OPW 2009) and Circular PL2/2014, through the use of the sequential approach and application of the Justification Tests for Development Plans and Development Plans.'*

daa recommended amendment as follows;

'Implement and comply fully with the recommendations of the Dublin Airport Local Area Plan Strategic Flood Risk Assessment and Surface Water Management Plan. The implementation of these plans and policy documents shall have regard to the outcomes of drainage studies undertaken for Dublin Airport, and any site specific, or industry specific information and requirements that may occur. Fingal County Council shall consult with Dublin Airport regarding local hydrology and flood mapping to take account of recent investigations and modelling works by Dublin Airport and ensure that the SFRA and SWMP are reflective of the most up to date mapping.

Chief Executives Response

The ongoing studies by daa will include important information on the surface water management system and flood risk for daa lands. This information is currently not available and is unlikely to be available prior to the adoption of the Dublin Airport LAP. Further studies are required as part of the Surface Water Management Plan prepared as part of the draft LAP and these will be taken into account as and when they become available.

Recommendation

No change.

Surface Water Objective

- daa recommends that objective SW03 be amended having regard to previous investment cycles which implemented SUDs features to existing paved/undeveloped areas. Objective SW03 seeks to, *'Introduce SUDS measure to existing paved/developed areas that do not currently have any SUDS features.'*

daa recommended amendment to objective SW03 as follows:

That Dublin Airport explore opportunities to implement SUDS features in existing areas where it may be feasible to do so having regard to operational and other constraints while acknowledging that retrospective attenuation has previously been implemented at Dublin Airport.

Chief Executives Response

The amendment is acceptable.

Recommendation

~~'Introduce SUDS measure to existing paved/developed areas that do not currently have any SUDS features.'~~ *'That Dublin Airport examine the feasibility of incorporating SUDS features into existing areas for the flooding and water quality benefits of same.'*

Surface Water Objective

- daa recommends that Objective SW08 be amended. Objective SW08 seeks to, 'Develop a robust surface water management system in compliance with the recommendations of the Dublin Airport Local Area Plan Strategic Flood Risk Assessment and Surface Water Management Plan associated with this LAP, to meet future development needs and providing resilience to the effects of climate change. This will entail a full review of the current surface water system at Dublin Airport including a review of drain down times, attenuation volumes, discharge rates, and opportunities for the retrofit of SUDS.

daa amendment to objective SW08 as follows:

'Develop a robust surface water management system in compliance with the recommendations of the Dublin Airport Local Area Plan Strategic Flood Risk Assessment and Surface Water Management Plan associated with this LAP, to meet future development needs and providing resilience to the effects of climate change. The implementation of these plans and policy documents shall have regard to the outcomes of drainage studies undertaken for Dublin Airport, and any site specific, or industry specific information and requirements that may occur including consideration of upstream or downstream impacts.'

Chief Executives Response

This amendment is acceptable.

Recommendation:

Amend Objective SW08 as follows:

'Develop a robust surface water management system in compliance with the recommendations of the Dublin Airport Local Area Plan Strategic Flood Risk Assessment and Surface Water Management Plan associated with this LAP, to meet future development needs and providing resilience to the effects of climate change. ~~This will entail a full review of the current surface water system at Dublin Airport including a review of drain down times, attenuation volumes, discharge rates, and opportunities for the retrofit of SUDS.~~ *The implementation of these plans and policy documents shall have regard to the outcomes of drainage studies undertaken for Dublin Airport, and any site specific, or industry specific information and requirements that may occur including consideration of upstream or downstream impacts.*'

ii) Amend Strategic Flood Risk Assessment and Surface Water Management Plan (Appendix 6) in this regard.

Surface Water Objectives

- daa recommends additional wording is recommended for Objectives SW05 and SW08 highlighting the need for thorough investigation of any potential flood zones and consideration of implications of any remedial measures on the catchment as a whole before implementation.

Objective SW05 seeks to, *'Alleviate local flooding issues within the LAP area by providing positive drainage to affected areas'*.

Objective SW08 seeks to, *'Develop a robust surface water management system in compliance with the recommendations of the Dublin Airport Local Area Plan Strategic Flood Risk Assessment and Surface Water Management Plan associated with this LAP, to meet future development needs and providing resilience to the effects of climate change. This will entail a full review of the current surface water system at Dublin Airport including a review of drain down times, attenuation volumes, discharge rates, and opportunities for the retrofit of SUDS'*.

Chief Executives Response

Objective SW05 of the draft LAP seeks to, 'Alleviate local flooding issues within the LAP area by providing positive drainage to affected areas' Wording of objective SW05 to be amended to reference FRM04 and that a Flood Risk Assessment is also conducted to ensure no increase in risk to third parties.

Recommendation

Amend objective SW05 as follows:

i) 'Alleviate local flooding issues within the study area by providing positive drainage to affected areas. 'Proposals should take into account objective FRM04 and that an Flood Risk Assessment is also conducted to ensure no increase in risk to third parties'.

ii) Amend Strategic Flood Risk Assessment and Surface Water Management Plan (Appendix 6) in this regard.

Surface Water Objectives

- daa requests amendment to Objectives SW07 and Objective SW08.

Objective SW07 seeks to, *'Establish riparian corridors free from new development along all significant watercourses and streams. Ensure a riparian buffer strip either side of all watercourses within the LAP lands'*.

Changes are required on the basis that it may not be appropriate to establish riparian corridors free from new development along all significant watercourses and streams within the airport boundary. Similarly, it may be not be appropriate to ensure a riparian buffer strip either side of all watercourses within the LAP lands which may encourage bird activity. In such instances, Dublin Airport will mitigate any such impacts which may be required having regard to aircraft navigation and in the interest of public safety having regard to the risk of bird strike.

Objective SW08 seeks to, *'Develop a robust surface water management system in compliance with the recommendations of the Dublin Airport Local Area Plan Strategic Flood Risk Assessment and Surface Water Management Plan associated with this LAP, to meet future development needs and providing resilience to the effects of climate change. This will entail a full review of the current surface water system at Dublin Airport including a review of drain down times, attenuation volumes, discharge rates, and opportunities for the retrofit of SUDS'*.

It is requested that 'opportunities for the retrofit of SUDS' be deleted within objective SW08 as daa has previously undertaken an investment programme with respect to the retrofit of SUDS in recent times.

Chief Executives Response

Objective SW07 is based on the overarching strategic objectives for the protection of ground water and specifically objective WQ05 as set out in the Fingal Development Plan 2017-2023. Amendments to objective SW08 is agreed.

Recommendation

i) Amend Objective SW08 as follows: 'Develop a robust surface water management system in compliance with the recommendations of the Dublin Airport Local Area Plan Strategic Flood Risk Assessment and Surface Water Management Plan associated with this LAP, to meet future development needs and providing resilience to the effects of climate change. ~~This will entail a full review of the current surface water system at~~

Dublin Airport including a review of drain down times, attenuation volumes, discharge rates, and opportunities for the retrofit of SUDS. *The implementation of these plans and policy documents shall have regard to the outcomes of drainage studies undertaken for Dublin Airport, and any site specific, or industry specific information and requirements that may occur including consideration of upstream or downstream impacts.'*

ii) Amend Strategic Flood Risk Assessment and Surface Water Management Plan (Appendix 6) in this regard.

5.0 Submissions relating to Chapter 1 – Introduction

Chapter 1 - Introduction

FIN-C239-60

The trend in passenger numbers increasing by 10m every 10 years from 20m in 2006 to 55m in 2050 is noted. In the context of airport growth, the measures intended to mitigate and manage environmental effects set out in the draft LAP is acknowledged. However, it is maintained that mitigation and management of environmental effects is best achieved through the management of passenger and flight numbers in line with industry technological advances to ensure that air and noise quality does not further deteriorate.

Chief Executive's Response

The draft LAP is a land use plan which is informed by strategic policy and plans, including National Planning Framework, the Regional Spatial and Economic Strategy and the National Aviation Policy, which support sustainable growth at the Airport. Management of passenger and flight numbers to mitigate air and noise quality is outside the scope of a land use plan which provides a framework for assessment of planning applications for development.

Further responses in relation to noise and air quality are outlined under Chapter 9 below.

Recommendation

No change.

6.0 Submissions relating to Chapter 3 – Forecasts and Capacity Constraints

Chapter 3 Forecasts and Capacity Constraints

FIN-C239-125, FIN-C239-129, FIN-C239-149, FIN-C239-156, FIN-C239-160, FIN-C239-173, FIN-C239-174

Summary of Comments

- Concerns are expressed regarding the conservative provision of 40 million passengers per annum proposed over the lifetime of the draft LAP. It is noted that growth projections for 2030 may significantly underestimate actual demand on the basis of historic trends cited in the DTTAS 'Review of the Capacity Needs of State Airport's'. Coupled with this, the annual growth rate of 2% in passenger growth as set out in the DTTAS review is questioned particularly in the context of the growth rates cited in the Commission for Aviation Regulation [CAR] in a recent draft determination on airport charges. It is highlighted that CAR assumes a substantially higher growth rate to 2024 and if this growth rate continues to 2030, the expected growth rate would be close 45 mppa in 2030. In this context, it is requested that the proposed passenger growth rate of 40 mppa be increased to 45 mppa during the plan period to ensure adequate headroom, long-term future proofing of the LAP and to cater for any potential unforeseen infrastructural developments during the plan period.
- A clear and transparent formula for the assessment of passengers numbers is required and shall form part of the LAP.
- It is noted that airport capacity relates the three components of the Airport system namely airside, terminal or landside and is the measure at which the users (passengers, aircraft, surface vehicles) of the facility can be accommodated over a given 'typical peak' or 'typical busy' hourly period at a given level of service and this is generally stated as the 'declared capacity'.

Chief Executive's Response

The proposed forecast passenger growth set out in the draft LAP is underpinned by the Department for Transport, Tourism and Sport 'Review of Capacity Needs at Ireland's State Airports' document. The DTTAS 'Review of Future Capacity Needs at Ireland's State Airport's' provides the basis for projected passenger forecasts as detailed in the draft LAP and includes a detailed forecasting methodology for passenger growth.

The forecasts are considered acceptable in terms of the timeframe of the LAP and the required infrastructure to cater for the associated future levels of demand for travel during that period. The analysis carried out to date in the preparation of this LAP and the supporting South Fingal Transport Study has identified the infrastructural measures that are required to cater for forecast passenger growth. To adopt a significantly higher figure would result in unsustainable impacts on the transportation network and would exceed the likely forecast capacity of the future transport network, an outcome that would be contrary to the proper planning and sustainable development not only of the LAP area but of the wider surrounding South Fingal area.

The passenger statistics within the draft LAP are extracted from a review document undertaken on behalf of the Department of Transport. The Commission for Aviation Regulation (CAR) has issued a determination for airport charges for Dublin Airport on the 24th October 2019. CAR utilised higher figures than the DTTAS Review or those predicted by Dublin Airport. FCC undertook review of the figures contained in the DTTAS review by aviation consultants during preparation of the draft LAP. The figures contained within the DTTAS Review were considered accurate for the purposes of analysing constraints within the DA zoned lands, specifically improvements required to surface access to the Airport before delivery of Metrolink. This is considered a significant constraint on future development of airport infrastructure in the DA zoned lands to ensure growth at the Airport in line with the National Aviation Policy. The draft LAP will have an operational period of 6 years, with potential for extension by a further 4 years in the event that objectives remain relevant. The statistics are considered appropriate for the purposes of facilitating analysis of development over the period of the draft LAP.

The draft LAP at Chapter 3 and specifically Section 3.2 defines airport capacity and includes the principal metrics upon which airport capacity is measured. In this regard, the definition as set out in the draft LAP includes the various airside and landside components including terminal processing capability. It is considered that the three components of the airport system referred to above are included as integral components in the measurement of airport capacity as set out in Chapter 3 of the draft LAP.

Recommendation

No change.

7.0 Submissions relating to Chapter 4 – Vision and Strategic Objectives

Chapter 4 Vision and Strategic Objectives

FIN-C239-60, FIN-C239-100

Summary of Comments

- It is requested that the proposed vision statement set out in the draft LAP reprioritise to safeguard neighbouring communities and the environment whilst supporting the core operational function of the Airport.
- More robust consideration of likely potential impacts on communities and wider environmental issues is required.
- The key strategic objective relating to the protection of the environment set out in Chapter 4 of the draft LAP is referenced as follows,

“All development proposals at Dublin Airport shall have regard to the requirement for environmental assessment including screening for Appropriate Assessment, Environmental Impact Assessment and Flood Risk Assessment in accordance with relevant legislation and guidelines.”

In this regard, there is a necessity for a standalone, in depth Health Impact Assessment in the context of WHO guidance 2018 as it specifically relates to noise in the interests of protection of human health. The draft LAP to consider WHO guidance in this regard.

Chief Executive’s Response

The vision statement as set out in Chapter 4 Vision and Strategic Objectives of the draft LAP seeks,

‘To facilitate and manage the sustainable growth of Dublin Airport in a manner that reflects its status as Ireland’s premier aviation gateway whilst safeguarding the core operational function of the Airport and supporting neighbouring communities, the economy and the environment.’

A key national strategic policy is for Dublin Airport to be developed as a secondary hub. This requires a sufficient level of airport infrastructure, including quality terminal facilities, runway capacity and surface access. However, FCC acknowledges that it must achieve a balance between promoting the potential of the aviation sector and safeguarding the primary operational role of Dublin Airport as the Country’s main international airport. In this regard, the draft LAP acknowledges that a careful balance is required between national economic and environmental objectives and the interests of stakeholders and airport related communities. It is also acknowledged there is a need to consider the likely impacts of climate change on airport infrastructure and aviation services. In this regard, the draft LAP promotes a balance between facilitating the efficient and effective operation of Dublin Airport set within the context of a sustainable growth framework. Specifically, the draft LAP seeks to ensure that the growth of Dublin Airport must be planned to take account of potential impacts on the airports

neighbouring communities and on the environment. The draft LAP specifically considers the environmental effects associated with airport growth at global level (the need to reduce emissions, tackle climate change and build resilience to the impacts of climate change) and at local level (noise, air quality, water quality, waste, traffic, natural and built heritage and community). The draft LAP includes measures intended to mitigate and manage environmental effects. Chapter 9 Environment and Community refers in this regard. The draft LAP at Chapter 5 places a strong emphasis on contributing towards carbon reduction within areas which can be addressed within the planning process and in this regard includes specific objectives CA01 – CA06.

The draft LAP acknowledges that active involvement by local communities and a wide range of other stakeholders is an essential part of the process of establishing and maintaining sustainable airport growth. The preparation of this draft LAP involved direct community engagement with representatives from St. Margaret's which lies immediately to the west of the Airport lands in the context of developing a strategy for the area. Appendix 1 refers in this regard and includes proposals for environmental and socio-cultural enhancements within the area. Specifically, Chapter 9 Environment and Community of the draft LAP recognises the need to balance the growth of the airport against impacts on neighbouring communities. The draft LAP acknowledges that a transparent and inclusive approach is vital to ensuring that concerns about future development of the Airport can be addressed at the earliest opportunity between communities and relevant airport stakeholders. In this regard, the draft LAP at Chapter 9 and specifically objectives CS1-CS3 promotes and facilitates the continued engagement between relevant stakeholders and local communities with a view to ensuring their concerns are understood and appropriate mitigation proposals implemented where required. Within the context of the sustainable growth framework approach as set out in the draft LAP, it is considered that the proposed Vision as set out in Chapter 4 is considered acceptable.

In relation to the impact on human health and WHO guidelines, currently no national guidance exists in relation to the management of noise in the planning process. Proposed Variation No. 1 to the FDP acknowledges the health impacts of noise in land use planning and sets out updated noise zones to provide for mitigation of the impact of noise on future residential and other noise sensitive uses. The noise zones aim to support future sustainable growth and development within lands exposed to aircraft noise, whilst facilitating the effective operation of the airport in line with national policy.

The WHO Environmental Noise Guidelines 2018 (WHO ENG) have been considered in the preparation of proposed Variation No. 1 which provides for revised aircraft noise zones relating to potential future operating scenarios at Dublin Airport. The proposed Variation has been prepared alongside this draft LAP. In recognition of the evidence set out in WHO Night Noise Guidelines for Europe 2009 (WHO NNG) and WHO ENG linking health effects with aircraft noise, including noise at night, appropriate noise exposure thresholds for night time have been included in noise zones set out in proposed Variation No. 1 which include a threshold of 40dB L_{night} in Zone D (WHO ENG defined level at which adverse effects start to occur).

Recommendation

No change.

8.0 Submissions relating to Chapter 5 – Transition to a Low Carbon Economy

Chapter 5 Transition to a Low Carbon Economy

FIN-C239-6, FIN-C239-13, FIN-C239-14, FIN-C239-16, FIN-C239-17, FIN-C239-18, FIN-C239-19, FIN-C239-21, FIN-C239-24, FIN-C239-29, FIN-C239-31, FIN-C239-35, FIN-C239-38, FIN-C239-40, FIN-C239-42, FIN-C239-44, FIN-C239-47, FIN-C239-50, FIN-C239-53, FIN-C239-55, FIN-C239-56, FIN-C239-57, FIN-C239-59, FIN-C239-63, FIN-C239-65, FIN-C239-69, FIN-C239-70, FIN-C239-75, FIN-C239-78, FIN-C239-87, FIN-C239-89, FIN-C239-91, FIN-C239-93, FIN-C239-95, FIN-C239-96, FIN-C239-102, FIN-C239-108, FIN-C239-111, FIN-C239-113, FIN-C239-120, FIN-C239-122, FIN-C239-123, FIN-C239-135, FIN-C239-139, FIN-C239-145, FIN-C239-148, FIN-C239-149, FIN-C239-156, FIN-C239-159, FIN-C239-160, FIN-C239-164, FIN-C239-166, FIN-C239-172, FIN-C239-174, FIN-C239-175

Summary of Comments

- Submissions raise concerns in relation to additional flights and the impact on climate action / emissions including from increased use of cars and the impact aviation emission will have on achieving climate action targets and the need to reduce flights at airport in this regard.
- There is a need for improved sustainability policies at Dublin Airport.
- A number of submissions highlight the contribution of aviation emissions to carbon emissions and request that Fingal set targets and goals for aviation emissions. Submissions also state that Fingal County Council's Climate Action Plan does not refer to aviation emissions.
- Aviation growth predictions appear to be based on action not being taken to give effect to the Paris Agreement. The basis for aviation growth predictions used should be set out and should include justification for method used.
- The Chief Executive's Report on submissions received should include alternative predictions in ranges consistent with the implementation of the Paris Agreement.
- It is requested that consideration be given to the different climate impacts of aviation emissions at different times of day and that Fingal seek expert advice to address the climate impact of flights. The CE Report should set out the options for control of climate impacts of flights to and from Dublin Airport taking account of the differential impacts of aviation at different times and using different flight paths.
- Fingal is required by the Climate Action and Low Carbon Development Act to have regard to the National Transition Objective and to the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change and sets out suggestions for mitigation of climate impacts of flights. The CE Report should include analysis of the options for controlling the climate impact of flights to and from Dublin Airport in planning conditions including taking into account time of day and year.

- It is submitted that emissions from aircraft are higher at night than during the day.
- There is a need for specific mitigation measures in LAP to absorb CO₂ from aircraft. It is suggested the following objective is included in the LAP *“that Fingal County Council will seek assistance from DTTAS and DAFM in funding measures for carbon sequestration/carbon capture to reduce/eliminate the effects of aircraft in the generation of CO₂”*
- A number of submissions refer to recent EU documents seeking to address emission from aviation including consideration of impacts of synthetic fuels.
- There is a need for carbon tax to be applied to aviation fuel.
- Potential impact of inclusion of aviation in the Emission Trading System by 2030 on the objectives in the draft LAP.
- Recommends daa should have a single use plastics policy for its partners
- Submissions refer to inclusion in draft LAP of reference to legally binding agreement to limit global warming and state that there is no such legal requirement and that the Paris Accord aspired to keeping temperature rise below 2°C.

Chief Executive’s Response

A key issue relating to the draft LAP in the context of climate change relates to greenhouse gas emissions arising from transport – both land and air. Greenhouse gases are the subject of agreements at international, EU and national level. International agreements, most recently the Conference of the Parties (COP) 21 Agreement in Paris, have been developed to unify national governments in a commitment to reduce the human causes of climate change. Targets are set for Ireland in relation to non-Emissions Trading System (non-ETS) sector emissions (this includes transport and non-energy intensive industry). Air craft emissions are included in the EU Emissions Trading System (ETS) and do not form part of national targets. As such, Fingal County Council has no role in the regulation or operation of airport flight activities in the context of climate and no remit to address emissions from the aviation sector.

In line with the commitment in the National Climate Action Plan, 2019, in relation to aviation emissions, Fingal County Council will support action at EU level to reduce emissions from the aviation sector. In this regard the draft LAP recognises and outlines the International Civil Aviation Organisations (ICAO) goal: *“Limit or reduce the impact of aviation greenhouse gas emissions on the global climate”* and supports the implementation of international initiatives such as the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) by the International Civil Aviation Organisation (ICAO), International Civil Aviation Organisation’s (ICAO) ‘basket of measures’, and the Airports Council International’s (ACI) Airport Carbon Accreditation.

As aviation emissions are outside the scope of the draft LAP and addressed by CORSIA, the draft LAP places emphasis on areas which can be addressed within the planning process, in particular through:

- Providing for specific proposals to reduce carbon emissions associated with surface access. This includes enhanced provision of public transport infrastructure in line

with airport growth and measures to increase the numbers travelling to the airport by public transport;

- Requiring proposals for carbon reduction to be addressed in planning applications including proposals for clean energy.
- Support the transition towards a net zero target by 2050.

These measures, combined with specific objectives of the draft LAP which will facilitate actions contained in the Climate Action Plan 2019 and include proposals relating to surface access and renewable energy, will benefit climate mitigation in line with global and national targets and support the transition towards a low carbon economy by seeking to reduce CO2 emissions at the Airport.

The government has published the Climate Action and Low Carbon Development Act 2015, the National Mitigation Plan, the National Adaptation Framework and Project Ireland 2040 (the National Planning Framework and the National Development Plan). These set out how Ireland will achieve its international and European commitments, and transition Ireland to a low carbon society. These have been considered in the drafting and publication of the Fingal County Council Climate Change Action Plan, 2019 – 2024 and this draft LAP. The Climate Action Plan sets out how the Council will improve energy efficiency and reduce greenhouse gas emissions in its own buildings and operations, while making Fingal a more climate resilient region, with engaged and informed citizens. Five key areas have been identified in the Climate Change Action Plan to reduce the impacts of climate change. These include Nature-Based Solutions which play an important role in biodiversity, ecosystems, flood prevention and carbon sequestration as well as filtering pollutants from air and water. Actions are outlined in the Climate Change Action Plan in this regard along with other actions to contribute towards reducing the impacts of climate change.

The draft LAP contains key strategic objectives seeking to give effect to the strategic vision and aims of the LAP, which have been developed as part of an iterative Strategic Environmental Assessment Process to drive an agenda of improved environmental outcomes at the Airport. Of importance to Climate Change are the following key strategic objectives as set out in Chapter 4 of the draft LAP:

Sustainability

'Adopt a sustainable approach to airport development which responds to important environmental constraints associated with future development and includes mitigation where necessary and appropriate.'

Environment

'To accelerate a transition to a low carbon economy by providing a reduction in CO2 emissions.'

'Reduce environmental impacts, build climate resilience and promote quality of life for neighbouring communities.'

The concern in relation to additional flights and carbon emissions is acknowledged. Equally, it must be acknowledged Fingal County Council has no role in the regulation or operation of aircraft flight activities in the context of climate change. However, the draft LAP places a strong emphasis on contributing towards carbon emissions reduction within areas which can be addressed within the planning process as outlined above.

The growth forecasts used in the draft LAP are based on the Oxford Economics Review commissioned by the Department of Transport, Tourism and Sport (DTTAS), 'Review of Future Capacity Needs at Ireland's State Airports', (August 2018). This report outlines the basis for the growth predications and had three stages:

1. Oxford Economics' DTTAS Review global macroeconomic model was used to develop economic assumptions for Ireland and world regions to 2050. Given the relatively high degree of uncertainty with any forecast over such a long-time horizon, forecasts under "upside" and "downside" scenarios, in addition to a central view were produced. The scenarios were informed by consultations with stakeholders to identify the key long-term drivers of demand for Ireland.
2. These economic assumptions were incorporated within the Tourism Economics / IATA national air passenger model to produce updated air passenger demand forecasts 4,000 country-pair flows under each of the three scenarios. The country-pair forecasts for Ireland were aggregated to four regions: UK and Ireland (domestic), Europe, Transatlantic, and Rest of World. These forecasts take no account of airport infrastructure capacity constraints and therefore represent an 'unconstrained' view of future passenger demand in Ireland.
3. Third, a bespoke airport allocation model was developed to produce projections at the airport level. The model was based on historical air passenger data for each airport, sourced from CSO Ireland and supplemented with more detailed information from the airports themselves. The model assumed that passenger demand at each airport from 2016 grows in line with Ireland's annual forecast growth rate for each region to 2050. This 'top-down' approach means that differences in forecast passenger growth rates across airports reflect differences in the regional passenger mix in the base year. It ensures that the Airport level forecasts are consistent with the 'unconstrained' outlook for passenger demand at the national level.

Once the passenger demand projections to 2050 for each of the three state airports had been completed, assumptions relating to aircraft size and load factors to forecast Air Transport Movements (ATMs) were used. Finally, the ATM forecasts were used as an input into forecasts for cargo demand at each airport.

This approach is considered reasonable and robust and alternative predictions are not required at this point. It is also noted that the Paris Agreement makes no explicit reference to emissions from international aviation, although it did put in place an

ambitious and legally binding long-term global goal, which has been considered in the making of this draft LAP, with a particular focus on reducing emissions through surface access and mobility management measures.

A number of submissions refer to the differences in emissions between day and night time flights. As noted above, aviation emissions are outside the scope of the LAP and addressed by CORSIA.

A number of submissions refer to the need for carbon tax on aviation fuel and consideration of impacts of synthetic fuels on emissions. While the contents of these submissions are acknowledged, their content falls outside the Planning Authority's remit and the scope of this draft LAP and consequently no change is recommended.

Regarding the potential impact of inclusion of aviation in the Emissions Trading System by 2030 on the objectives of the draft LAP, as noted above, aviation emissions are outside the scope of the LAP and addressed by CORISA.

In relation to daa's approach to single use plastic, daa's sustainability strategy is noted which includes objectives in this regard.

Regarding the Paris Accord agreement, this text from the LAP (which is also referenced in the SEA Environmental Report) has been informed by information from the European Union https://ec.europa.eu/clima/policies/international/negotiations/paris_en This information from the EU states that at the Paris climate conference (COP21) in December 2015, 195 countries adopted the first-ever universal, legally binding global climate deal. The agreement sets out a global action plan to put the world on track to avoid dangerous climate change by limiting global warming to well below 2°C and pursuing efforts to limit it to 1.5°C. It is proposed to amend the text relating to this section of the draft LAP to provide clarification in relation to the point raised in the submission.

Recommendation

Amend section 5.1 of draft LAP (and corresponding text of SEA ER) to replace "~~At COP21 in Paris 2015, the parties reached a legally binding and universal agreement to limit global warming to 1.5°C above pre-industrial levels~~" with the following text:

~~At COP21 in Paris 2015, the parties reached a legally binding and universal agreement~~ to *combat climate change and to accelerate and intensify the actions and investments needed for a sustainable low carbon future. The Paris Agreement central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2°C above pre-industrial levels and to pursue efforts to* limit global warming to 1.5°C above pre-industrial levels.

9.0 Submissions relating to Chapter 6 – Economic Impact of Dublin Airport

Chapter 6 Economic Impact of Dublin Airport

FIN-C239-3, FIN-C239-42, FIN-C239-60, FIN-C239-91, FIN-C239-100, FIN-C239-118, FIN-C239-123, FIN-C239-125, FIN-C239-129, FIN-C239-135, FIN-C239-136, FIN-C239-141, FIN-C239-142, FIN-C239-145, FIN-C239-150, FIN-C239-153, FIN-C239-154, FIN-C239-158, FIN-C239-164, FIN-C239-168, FIN-C239-174

Summary of Comments

Dublin Airport Growth and Economic Development

- A number of submissions welcome the ongoing development of Dublin Airport and support the implementation of Dublin Airport's Capital Investment Programme which will further address the airport's current capacity constraints and prepare it for substantial future growth. Dublin Airport as a strategic national asset and significant economic driver for the Greater Dublin Region and the Country at large is acknowledged. Recent large scale capital investments such as north runway and Dublin Airport Central are noted as crucial in maximising the economic benefits arising from passenger and business travel and air cargo operations. The commencement of development works on the north runway is welcomed as well as the advanced development stage of Dublin Airport Central.
- The draft LAP's commitment to safeguard Dublin Airport's future development plans through strategic land-use management is welcomed particularly in the context of Dublin Airport's role as a key infrastructure asset of national strategic importance and main international gateway providing links to approximately 200 destinations in 43 countries. Government policy which supports the growth at Dublin Airport in the interests of the overall economy is noted particularly in the context of attracting foreign direct investment, tourism and trade.
- It is noted that international connectivity is crucial for Ireland's overall competitiveness, trade and tourism sectors, particularly in a post Brexit economy. In this context, it is critical that the draft LAP supports, facilitates and protects the future growth of the Airport to meet the demands of the market.
- It is noted that limitations to international connectivity would impinge on Ireland's attractiveness as a hub for future investment and employment opportunities. In this context, it is noted that permitted runway restrictions of 65 aircraft movements between the hours and 23.00 and 07.00 are addressed and amended.
- The LAP shall continue to support and protect Dublin Airport's growth into the future thus protecting and increasing business, trade and employment opportunities for future generations. In the local context, Dublin Airport is

critically important to the local economy of Fingal and the surrounding regions. Dublin Airport's role as the largest employer in Fingal is highlighted in this regard. Against this growth, the draft LAP acknowledges the need for improved accessibility to the Airport and the sustainability actions which need to be undertaken to allow for the sustained development of the Airport into the future are welcomed.

Economic Dependence on Air Transport

- The recognition of the important role of air cargo facilities at Dublin Airport as set out in the draft LAP is welcomed. It is noted that Dublin Airport accounts for the vast majority of Ireland's air cargo movements and that air cargo carried approximately 35% of all Irish merchandise exports by value. The sector also supports extensive employment in Ireland. The importance of time critical express freight flown during the night is also highlighted. Caution is expressed regarding Objective CG2 of the draft plan which facilitates the relocation of existing cargo operations from the eastern campus. Notwithstanding, objectives to facilitate and support the growth of air cargo as set out in the draft LAP is welcomed. It is requested that the stated cargo objectives within the draft LAP be dependent on the development of a comprehensive Cargo Strategy prepared in consultation with cargo operators and other relevant stakeholders.

Projected Passenger Growth

- Fingal's projected passenger growth is highlighted. In this regard, concern is expressed that these forecasts are too conservative and it is requested that FCC revise their estimates from 40 mppa by 2030 to 45 mppa. It is also noted that Dublin Airport should facilitate arrivals and departures in the early morning and late evening to maintain Ireland's current reach and expand connectivity to new destinations, which will allow Ireland to connect to the world's fastest growing markets, driving economic growth and boosting Irish exports.

Infrastructure Projects and the Economy

- It is noted that Ireland's ability to grow living standards and remain competitive depends on having a world-class airport in its capital and that Dublin Airport's infrastructure is critical, not just for Dublin, but for the Country as a whole. The current capacity-enhancing infrastructure projects planned for Dublin Airport, i.e. Metrolink and the second runway are supported and it is highlighted that these enhancements are vital in pursuit of the overall goal of delivering a world class airport. In terms of the short and long-term development horizon of the Airport, it is essential that the enabling transport infrastructure (i.e. Metrolink, BusConnects) is fully operational by 2027.

In the context of attracting investment, certainty on transport project delivery timelines (inclusive of necessary road upgrades) and the commencement of construction would assure potential investors. It is also noted that failure to support the expansion of the Airport will have significant negative implications for passengers, staff, airlines and tourism and the local economy.

- Concern is expressed regarding the draft LAP's restriction on any further development until current surface access issues are addressed through the implementation of transport alternatives such as Metrolink and BusConnects. In this regard, this strategy will undermine Dublin Airport as a viable business location.

Dublin Airport Central (DAC)

- The availability of high-quality office space in DAC is noted and together with the potential to develop commercial property in the wider environs of the Airport would greatly enhance Fingal as a location for inward investment and the creation of high-value, highly-skilled jobs.
- Other submissions consider that non-airport related office development should not be located on the airport campus due to congestion.
- It is requested that daa masterplan should be made available in conjunction with LAP for comment.

Balanced Regional Development

- Currently it is noted that more than 80% of all visitors to Ireland enter via Dublin Airport. It is requested that a more balanced approach to the development of other state and regional airports across Ireland occurs in order to prevent over reliance on Dublin Airport. In this regard, concerns are expressed that Shannon and Cork airports are not fully utilised relative to Dublin Airport which should only be allowed to grow in the context of a balanced regional airport policy, to ensure economic growth is spread across the Country. This would increase employment and drive economic activity outside of the Dublin region. It is requested that daa be proactive in the development of other state airports under their management given the role of state bodies to drive economic growth in a targeted and sustainable way. Government policy relating to regional growth is noted and to allow unconstrained commercial development at Dublin Airport runs contrary to this stated goal.

National Planning Framework

- Dublin Airport is recognised as a crucial piece of infrastructure for national and regional development and it is noted that the National Planning Framework has identified the development of an additional runway and terminal facilities as a key action point with the Airport identified as strategic investment priority to achieve high quality international connectivity. As an island economy, the effectiveness of our international connections and transport routes to the EU and wider global context is vital to ensuring our continued competitiveness. The sustainable growth of Dublin Airport should be supported, to facilitate airport growth in recognition of its importance as a national resource, ensuring that the core operational transport function as an airport is protected, and undertaking development in accordance with supporting government policy.

Chief Executive's Response

Dublin Airport Growth and Economic Development

The submissions highlighting the critical importance of Dublin Airport to the local and national economy are noted. Our geographic location on the periphery of Europe means that air linkages are vital to ensure Ireland's global competitiveness and maintaining and improving air access is a national imperative, which is supported in this draft LAP.

The draft LAP's commitment to safeguard Dublin Airport's future development plans through strategic land-use management is necessary particularly in the context of Dublin Airport's role as a key infrastructure asset of national strategic importance.

Economic Dependence on Air Transport

Dependence on air transport to access markets, manage suppliers and collaborate on R&D projects is an intrinsic part of business for many of the local and international companies located in Fingal and in the wider area. Due to their high propensity to fly, access to an international hub airport of global standing is essential to their efficient operation. Submissions highlighted this dependence on air transport to have global reach and noting that the Airport is essential to the ability of Ireland and Dublin to continue to attract inward investment and tourism to drive economic performance are acknowledged.

In line with the National Aviation Policy, the draft LAP recognises the important supporting role of cargo facilities at Dublin Airport and promotes the maintenance and continued growth of such facilities. In interests of clarity, the draft LAP does not require relocation of existing cargo operations but provides supporting objectives to facilitate the relocation and expansion of new cargo facilities and potential consolidation of air cargo operations subject to site specific flood risk assessment and transport assessment within the airfield. The request for the preparation of a Cargo Strategy is noted. Cargo operations are dealt with under Objective CG1 and CG2. Further detail is not considered necessary in this regard.

In relation to restrictions on the operation of runways, any changes to operating conditions will be required to be considered as part of a planning application, and, where relevant subject to consideration by the Aircraft Noise Competent Authority. Proposed Variation No. 1 to the FDP sets out noise zones relating to potential future use of parallel runways at Dublin Airport in order to protect sensitive land use in the vicinity of the Airport and protect the operational safeguarding of Dublin Airport.

Projected Passenger growth

Ongoing growth of tourism numbers to the state via Dublin Airport is expected to increase and has consequential economic benefits for the State, the Dublin Region and Fingal. The significant passenger growth that has occurred and the forecast for continued growth over the period of the draft LAP is noted and is supported by government policy at national, regional and local planning level. Significant investment is undoubtedly required in aviation and surface access infrastructure to support the planned growth in passenger numbers. This is reflected in the policies and objectives

contained within the draft LAP and passenger numbers will continue to be monitored over the coming years.

Infrastructure Projects and the Economy

It is acknowledged that delivering enhanced infrastructure is critical to give Dublin Airport the capacity it needs to meet its growth potential in the future, providing further opportunity to develop the economy and provide opportunities for additional jobs, tourism, trade and investment. As outlined in Section 8.3 of the draft LAP, Fingal will continue to support the NTA, TII and other stakeholders in ensuring that Metrolink and the Core Bus Corridors (including BusConnects) is delivered as soon as possible. Fingal will continue to encourage and facilitate the provision of an integrated public transport network to serve Dublin Airport (Objective PT1 of the draft LAP).

Dublin Airport Central

The submissions relating to office development at DAC are noted. This office development known as Dublin Airport Central (DAC) is not aviation related, but does undoubtedly benefit from a location proximate to the Airport. The Dublin Airport Centre Masterplan, 2016, sets out a second phase, but it is considered that surface access investment should be utilised to ensure that the key national and regional growth stimulus of improved core airport function is facilitated. This would preclude the development of further large scale office development on HT zoned lands within the eastern section of the Airport, until such time as necessary surface access infrastructure is in place. Ongoing monitoring of passenger numbers and traffic in the area will inform the development of these lands in the future, whilst Fingal will continue to support the improved road access measures and the Swords CBC, BusConnects and Metrolink to ensure they commence as soon as possible. Furthermore, it should be noted that any planning application which increases passenger numbers or that results in an increased demand for travel, shall clearly demonstrate the required transport infrastructure and measures to accommodate the proposed increase in line with the recommendations of the *South Fingal Transport Study* (Objective SF01 of the draft LAP).

It is clearly established within national policy documents that the managed growth of Dublin Airport is critical to the economic well-being of the state. It is further demonstrated that the success of the Dublin region is intrinsically linked to the accessibility provided by the Airport and this is noted in the draft LAP. In addition, the Airport itself is a significant economic generator of income and employment. Finally, the Airport is the largest employer in Fingal and the economic status of the County is enhanced through the significant accessibility provided to the Airport in addition to the many spin-off benefits accrued. Protection of the core function of the Airport is a key objective of the draft LAP in order to ensure that the significant investment required to ensure sustainable growth is utilised equitably for the benefit of the nation, region and County.

The DAC Masterplan is available on the FCC website.

Balanced Regional Development

The draft LAP recognises that high quality accessibility to internal gateways, located both within and outside of the region, for people and internationally traded goods and services is of fundamental importance to economic competitiveness at regional and national levels. The *National Aviation Policy* (2015) sets out three goals in relation to national economic development and Dublin Airport, which relate to enhancement of connectivity, fostering growth of aviation enterprise and maximizing the economic impact of aviation.

This draft LAP focuses on Dublin Airport and the surrounding areas within the context of the County of Fingal and the wider Dublin Region. The draft LAP is designed as a land use plan to facilitate the future sustainable growth of Dublin Airport over the next 6 years in line with national and regional policy objectives relating to aviation and land use planning. The competitiveness or otherwise of other regional airports is not within the control of FCC or within the remit of this draft LAP. Furthermore, this draft LAP cannot influence commercial operating decisions made by daa or other airport authorities.

National Planning Framework

Comments regarding the NPF are noted. Having regard to Chapter 2 of the draft LAP and the submission of the Office of the Planning Regulator and the Eastern and Midlands Regional Assembly, it is considered that the draft LAP complies with the NPF.

Recommendation

No change.

10.0 Submissions relating to Chapter 7 – Airport Infrastructure

Chapter 7 Airport Infrastructure

FIN-C239-83, FIN-C239-120, FIN-C239-160, FIN-C239-173, FIN-C239-174

Summary of Comments

Taxiways and Aircraft Parking Stands

- Concern is expressed regarding ground delays experienced at Dublin Airport in relation to taxi-ways and aircraft parking stands.
- It is requested that the Irish Airline Pilots Association [IALPA] be included as an organisation for consultation in the planning process particularly in the context of the future development taxi-ways and aircraft parking stands in the interests of aircraft and passenger safety.

Third Terminal

- Regarding the provision of a third terminal at Dublin Airport, it is requested that this terminal infrastructure and associated aviation uses be located on the western section of the 'DA' zoned lands and constructed in parallel with the proposed western access road from the M2/N2 road corridor. Specific subject lands are proposed in this regard. It is maintained that the provision of a third terminal to the west of the 'DA' zoned lands including the wider development of the western campus in conjunction with the proposed western access road would serve to safeguard the future growth and operation of Dublin Airport and unlock the development potential of the wider western 'DA' zoned lands.
- It is maintained that the development of a third terminal at this location aligns with national and regional government policy objectives including objectives at local level which supports the provision of terminal and associated surface access infrastructure to facilitate the growth of Dublin Airport. Relevant policy at national, regional and local level is cited in this regard.
- The strategic importance of the western access road in the context of national and regional government policy objectives which supports the provision of a western access to the airport lands is highlighted. It is requested that the draft LAP shall be explicit in terms of the importance of this strategic roads infrastructure to the future growth of Dublin Airport. A Route Options Assessment Report for a western access road has been submitted in support of this proposal. It is noted that the development of the western campus would have the potential to be served by public transport provision.
- The economic importance of Dublin Airport to the Irish economy is acknowledged in the context of its primary gateway function including employment generation and tourism. The economic potential of a third terminal and the development of the wider western campus is noted. Reference is made

to the economic objectives ED1, ED2 and ED3 of the draft LAP and specifically key objective ED1 which can only be achieved in the context of a third terminal on the western campus. Objective ED1 seeks to 'Ensure an appropriate balance is achieved between developing the unique potential of Dublin Airport as an economic generator and major employer in the County and protecting the core operational function as the Country's main international airport'. From an economic perspective, it is requested that the strategic objective relating to growth and connectivity as set out in the draft LAP at Chapter 4 be amended to include reference to the western campus as follows:

'Provide for the necessary airside and landside infrastructure *in the Western Campus of Dublin Airport* to facilitate the projected increase in passengers over the life of the LAP whilst safeguarding for longer term growth'.

- It is noted that the existing eastern campus has reached its maximum operational and development potential. It is noted that the draft LAP has not considered the individual and in-combination constraints associated with landside, terminal and airside infrastructure at Dublin Airport and specifically the draft LAP lacks consideration of the critical airside congestion issues.
- In this regard, concern is expressed as to the ability of this existing campus to accommodate 40 mppa as set out in the draft LAP which equates to an increase of 8 million passengers per annum and 20,000 additional flight movements based on current constraints. This would have a serious negative effect on the safe and efficient operation of Dublin Airport.
- Concern is expressed regarding the over-reliance of the draft LAP on the DTTAS 'Review of the Capacity Needs of Ireland's Airports' which specifically lacks a land-use perspective and growth forecasts are considered overly conservative in the context of annual growth rates experienced by Dublin Airport in recent times. While it is acknowledged that the draft LAP commits to undertaking a review to determine the best location for a third terminal during the lifetime of the LAP, an immediate decision on siting of a third terminal is required. In this regard, the proposed subject lands are considered the optimum location for the provision of a third terminal.
- It is considered that the draft LAP does not sufficiently respond to the urgent need for the provision of a third terminal.
- Notwithstanding the statutory timeframe of the draft LAP, concern is expressed regarding the short-term development horizon of the draft LAP and the long-term approach to the siting of a future third terminal. Reference is made to the Dublin Airport Local Area Plan 2006-2015 which fully endorsed the vision for a western campus and third terminal. Notwithstanding the identification of the subject lands as a potential location for a third terminal as cited in the DTTAS review, it is maintained that the land-use principles and vision for a third terminal as set out in the Dublin Airport Local Area Plan 2006-2015 remains valid

and sufficiently robust. In this regard, it is requested that the established designations as set out in the Dublin Airport Local Area Plan 2006-2015 to facilitate the development of the western campus including provision of a third terminal and associated aviation uses be retained in the draft LAP.

- In the absence of a specified location for a third terminal, it is considered that the provisions of objective EA3 which seeks that, 'All development proposals shall not prejudice the orderly operation and continued growth of the Airport including provision of a third terminal in the future' as set out in the draft LAP cannot be met. It is further considered that the development of key aircraft infrastructure including maintenance repair and over haul facilities (MRO) in the context of this objective would be premature pending the determination of a specified location for a third terminal.
- Reference is made to the global trend towards commercialisation and private-sector involvement in the construction and management of airport infrastructure.
- Sets out that a plan-led and evidence based approach to the provision of future terminal infrastructure at Dublin Airport represents the most sustainable, climate conscious and economical approach to the provision of such infrastructure including the realisation of national and regional planning policy objectives. In support of this proposal, a design concept plan for a proposed third terminal and the development of a wider western campus has been submitted.

Air Cargo

- It is noted that the draft LAP facilitates the relocation of existing cargo operations to the western section of the 'DA' zoned lands.

Airfield Vehicular Circulation

- It is requested that all service vehicles operating airside are electric powered to reduce noise and air pollution, all power at stands to be made available from ground based connections and all mobile diesel-powered generators to be phased out within 3 years. In addition, heating of other specific infrastructure at the Airport could be facilitated by the use of gas generated from future large sludge facilities in the County. All power requirements to be purchased from renewable energy suppliers only.

Additional Supporting Utility Infrastructure

- Recommends that fuel storage at Dublin Airport should be underground to address hazards associated with fuel storage.

Operational Safeguarding

- Concern is expressed regarding the removal of the existing red approach zones and their replacement with noise contours.

Chief Executive's Response

Taxiways and Aircraft Parking Stands

The draft LAP at Chapter 7 Airport Infrastructure and specifically Section 7.2.3 Taxiways acknowledges that the north runway, which is currently under construction, has been designed and approved with a full set of Rapid Exit Taxiways [RETs] and an associated parallel taxiway system. This facilitates movement of planes into take-off position and off the runway in the most efficient manner. The draft LAP also recognises that as the type of aircraft using the Airport changes and the spacing allowed between departing and arriving aircraft made more efficient, the most effective layout of RETs may change. Additional RETs may also be required. To facilitate the efficiency of airside operations, the draft LAP supports the development, amendment and enhancement of existing taxiways that may be required. Specifically, Objective TW1 seeks, 'To facilitate the development, amendment and enhancement of existing taxiways where required to improve the efficiency of airside operations'

The draft LAP at Chapter 7 Airport Infrastructure and specifically Section 7.2.4 'Aircraft Parking Stands, Piers and Boarding Gates' identifies the need for additional and enhanced aircraft parking stands as one of the key infrastructural requirements to facilitate the phase of growth during the plan period. Specifically, the draft LAP incorporates Objectives SBG1 and SBG2 to facilitate the provision of additional and improved aircraft parking facilities to meet forecast air traffic demand.

Objective SBG1 seeks to, 'Facilitate the development of new stands, piers and boarding gates in line with the expansion of associated runway and terminal capacity across the Airport having regard to the need to protect key operational areas.'

Objective SBG2 seeks to, 'Provide improved and expanded parking facilities for aircraft'.

The draft LAP notes that increased provision of aircraft parking stands, piers and gates capacity will become increasingly important during the plan period to facilitate the Airport's strategic role as a European hub airport.

The inclusion of IALPA as a consultee in the planning process is a legislative matter and therefore outside the remit of the draft LAP.

Third Terminal

Policy context at national, regional and local level supporting the provision of terminal and other supporting infrastructure in the context of airport growth is acknowledged and detailed in Chapter 2 of the draft LAP. Specific reference to the subject lands as one of the potential locations for a future third terminal to the west of the 'DA' zoned lands as detailed in the government sponsored 'Review of Future Capacity Needs at Ireland's State Airports', (DTTAS – August 2018) is acknowledged. Furthermore, the National Planning Framework National Strategic Outcome 6 references the need for improved terminal facilities and the Regional Spatial and Economic Strategy also specifically expresses support for the National Aviation Policy while also referencing improved

terminal facilities. The National Aviation Policy specifically identifies three locations for additional terminals, while also acknowledging that existing terminals could be improved to accommodate additional passengers. It is considered that the policies within the draft LAP which reflect the National Aviation Policy, along with the DA zoning, which is sufficiently flexible to facilitate terminals in any of the three locations set out in the National Aviation Policy are adequate for development of improved terminal facilities at the Airport.

The draft LAP at Chapter 8 Surface Access and Transport and specifically Section 8.2.3 acknowledges that an alternative western access route is necessary to facilitate increased public transport access to the DA zoned lands and also to the existing eastern campus, to ensure continued efficient operation of the road network in the context of airport growth, to provide additional resilience for the existing motorway network and serve to reduce the dependency on the eastern access to Dublin Airport.

The paramount significance of Dublin Airport as an economic entity in Fingal and the region, and its ability to drive economic development and generate direct and indirect forms of employment is highlighted and further outlined and supported in Chapter 6 of this draft LAP through objectives ED1-ED3. Chapter 6 also acknowledges that delivering enhanced infrastructure is critical to give Dublin Airport the capacity it needs to meet its growth potential within the plan period, providing further opportunity to develop the economy and provide opportunities for additional jobs, tourism, trade and investment.

The draft LAP's commitment to safeguard Dublin Airport's core function through strategic land-use management is necessary particularly in the context of Dublin Airport's role as a key infrastructure asset of national strategic importance.

In this regard, objective ED1 of the draft LAP seeks to 'Ensure an appropriate balance is achieved between developing the unique potential of Dublin Airport as an economic generator and major employer in the County and protecting the core operational function as the Country's main international airport'.

It is considered that the government sponsored 'Review of Future Capacity Needs at Ireland's State Airports', (DTTAS – August 2018) is sufficiently robust to inform the preparation of this LAP. This review together with the findings of the South Fingal Transport Study provides a comprehensive basis for the identification of key capacity constraints from a landside and airside perspective including the identification of key infrastructural interventions required to facilitate sustainable growth during the plan period. On this basis, Chapter 3 Forecasts and Capacity Constraints of the draft LAP details the most critical landside and airside capacity constraints affecting the Airport which require resolution during the period of the LAP. Chapter 8 Surface Access and Transport sets out in detail the objectives to support enhanced surface access to the Airport. Chapter 7 Airport Infrastructure sets out the objectives to support the additional capacity enhancing infrastructure to enable this phase of growth during the plan period in order to achieve the objectives of the National Aviation Policy. Subject to specified capacity enhancing infrastructure to address identified capacity constraints, the focus for development during the plan period is set out in Chapter 7 of the draft LAP.

In the intervening period since the previous Dublin Airport Local Area Plan 2006-2015, the DTTAS review has been carried out and identifies the need for a third terminal to facilitate anticipated growth in the longer term which has informed the draft LAP. In this

regard, the review identifies the following 3 no. potential locations for Terminal 3 (T3) within the 'DA' Dublin Airport zoned lands as follows:

1. North-East of T1
2. North-West of T1
3. West of runway 16/34

As set out in the DTTAS review, it is noted that the subject lands are identified as a potential location for a third terminal within the western section of the 'DA' zoned lands. To reaffirm the potential of the subject lands for the provision of a third terminal, the draft LAP shall include the DTTAS review graphic showing the three potential locations for T3 which includes the subject lands. The options provide an opportunity for strategic stakeholder discussions and engagement on the future development of Dublin Airport. In this regard, the draft LAP includes objective TP3 which supports the detailed review of these three potential locations to determine the optimum location for a third terminal. To delete objective TP3 would run contrary to the provisions of the government sponsored 'Review of Future Capacity Needs at Ireland's State Airports' which provides strategic direction at national level regarding the provision of a future third terminal at Dublin Airport.

In the interim, the 'DA' zoning objective within this LAP provides an adaptive land-use which supports aviation and related uses. It is noted that the 'DA' zoning objective has been transposed from the previous Fingal Development Plan 2005-2011 into subsequent development plans including the current Fingal Development Plan 2017-2023. The 'DA' zoning objective allows for appropriate new terminal development to be considered subject to necessary environmental and surface access assessments.

Objective EA3 of the draft LAP requires that, 'All development proposals shall not prejudice the orderly operation and continued growth of the Airport including provision of a third terminal in the future'. The DA zoning within the Fingal Development Plan 2017-2023 facilitates airport infrastructure. This includes the provision of a third terminal. Three potential terminal locations are set out in the DTTAS Review (2018). Within the development management process for assessment of future applications, it is considered prudent that applicants ensure that consideration is given to development proposals proximate to these locations to ensure avoidance of development which would make provision of a third terminal in the locations identified by DTTAS unsustainable.

Air Cargo

In line with the National Aviation Policy, the draft LAP at Chapter 7 Airport Infrastructure and specifically Section 7.2.6 Air Cargo recognises the important supporting role of cargo facilities at Dublin Airport and promotes the maintenance and continued growth of such facilities. In the interests of clarity, the draft LAP does not propose the relocation of existing cargo facilities to any specific location within 'DA' zoned lands. The draft LAP supports the provision of improved apron facilities serving cargo operations which could allow for the relocation of existing cargo operations from the eastern campus. This would facilitate maximising the ability of this campus to accommodate expanded

passenger capacity and services. The draft LAP requires that any applications to expand cargo facilities shall be accompanied by a demonstration of need, along with an operational overview of existing and proposed facilities, site specific flood risk assessment and transport assessment.

Airfield Vehicular Circulation

The draft LAP emphasises a greater shift towards the integration of low carbon and energy efficient technologies across airport buildings and operations to enable Dublin Airport to develop as an energy efficient hub. In particular, the draft LAP at Chapter 7 Airport Infrastructure and specifically Section 7.4 Airfield Vehicular Circulation supports the replacement of existing airside ground service vehicles with electric vehicles within the lifetime of this LAP and includes a specific objective in this regard.

Specifically, Objective AV02 seeks to, 'Support the replacement of the existing aircraft ground service vehicles with electric vehicles within the lifetime of this LAP where practicable.'

The draft LAP at Chapter 5 Transition to a Low Carbon Economy requires that future development at Dublin Airport demonstrate the integration of renewables-focused energy generation systems to support a reduction in greenhouse gas emissions and the Airport's carbon footprint through development proposals. In this regard the draft LAP includes the following objectives,

Objective CA03 seeks to, 'Require that all new developments at the Airport incorporate design solutions aimed at reducing carbon emissions, including the incorporation of renewable energy and energy saving technologies where practicable, including the use of district heating/cooling systems.'

Objective CA04 seeks to, 'Facilitate, where appropriate, sustainable energy development proposals and projects at Dublin Airport.'

Additional Supporting Utility Infrastructure

It is noted that Planning Permission F15A/0580 permitted a new fuel farm including an aviation fuel underground hydrant pipeline, 4.2 km in length from the existing fuel farm on Corballis Road to the existing piers within the Airport campus. This development is complete. The undergrounding of fuel storage is considered to be outside the remit of the LAP.

Operational Safeguarding

The draft LAP at Chapter 7 Airport Infrastructure and specifically Section 7.6 Operational Safeguarding acknowledges the important aviation related designations that are associated with the safe operation of the Airport that apply to the LAP lands. In the interests of clarity, the red approach zones are proposed for replacement with the most recent and relevant Irish Aviation Authority Obstacle Limitation Safeguarding Map which sets out the guidance on the type and height of any structures that may be developed

at Dublin Airport and its environs. This issue is effectively dealt with in the proposed Variation 1 of the FDP 2017-2023 and the CE Report refers in this regard. Objective OS1 of the draft LAP seeks to, 'Control the type and height of any structures that may be developed in the environs of the Airport (in consultation with the Irish Aviation Authority) in accordance with the Obstacle Limitation Requirements of Regulation (EU) No 139/2014 (EASA Certification Specifications), previously required under ICAO Annex 14 and which are depicted on the aerodrome operator's safeguarding map.'

Recommendation

Insert Figure 78 from DTTAS Review (2018) into Section 7.2.1 of the draft LAP.

11.0 Submissions relating to Chapter 8 – Surface Access and Transport

Chapter 8 Surface Access and Transport

FIN-C239-3, FIN-C239-70, FIN-C239-80, FIN-C239-83, FIN-C239-84, FIN-C239-86, FIN-C239-88, FIN-C239-98, FIN-C239-100, FIN-C239-111, FIN-C239-118, FIN-C239-120, FIN-C239-123, FIN-C239-125, FIN-C239-129, FIN-C239-133, FIN-C239-143, FIN-C239-144, FIN-C239-149, FIN-C239-150, FIN-C239-153, FIN-C239-154, FIN-C239-156, FIN-C239-157, FIN-C239-158, FIN-C239-159, FIN-C239-160, FIN-C239-162, FIN-C239-164, FIN-C239-168, FIN-C239-171, FIN-C239-173, FIN-C239-174

Summary of Comments

Capacity of existing road network and need for public transport

- A number of submissions express concerns regarding the ability of the strategic road network including the M50 and local road network to cater for future airport growth. Growth in airport passenger numbers is cited as a significant factor in the growth in traffic on the M50 and approach roads and future demand for road capacity resulting from projected additional passengers is highlighted including potential demand from intensification at Dublin Port. Concerns note that M50 and its approach roads are currently at capacity and this situation will exacerbate to 2030 particularly in the context of the lack of an adequate public transport network and the rapid future growth of the Airport including hotel development. In this regard, the draft LAP should examine this most significant constraint. It is recommended that prior to Metrolink and BusConnects, interim measures are required to alleviate congestion approach roads into and out of the Airport. A number of submissions express concerns regarding the significant constraints in public transport infrastructure and the heavy dependence on the M1 and M50 road network to access the Airport.
- A number of submissions highlight the need for local road network improvement and investment in the vicinity of the Airport including upgrades to Station Road – Portmarnock, Chapel Road Kinsealy and Forrest Little–Swords Road which are urgently required from a safety and capacity viewpoint. It is also noted that a high proportion of airport employees travel to the Airport by car and many employees use local roads to get to and from work. Many of these roads were not designed for the volume of traffic they carry and there is an urgent need to substantially increase the capacity of these roads if the Airport is to expand as envisaged.
- Reference is made to the need for significantly enhanced public transport alternatives to address congestion and to ensure that the core transport function of the Airport is protected. The LAP should be more explicit in its support for public transport provision and drive modal split towards public transport through additional robust objectives as a priority over road infrastructure provision.
- Recommends prioritising Metrolink and BusConnects which require to be fast-tracked in collaboration with TII and NTA. Specific objectives relating to the provision of Metrolink and BusConnects as set out in the draft LAP are supported in this regard. The importance of delivery and operation of enabling public transport

infrastructure such as Metrolink and Bus Connects by 2027 is highlighted in the context of facilitating economic growth and attracting inward investment to the region including the County town of Swords. The LAP should focus heavily on new and improved bus services in view of potential delays to Metrolink and an objective within the LAP is required in this regard.

- The importance of a fully integrated public transport system is highlighted as a necessary requirement with connectivity between the Airport with the rest of Ireland, Dublin City Centre and surrounding suburban areas including regional bus and train services. One submission notes the South Fingal Transport Study 2019 anticipates a 104% increase in growth in the Fingal / Dublin Fringe area by 2027. Over half of this increase is presumed for the Clongriffin / Belmayne area. There is currently no public transport link between Clongriffin and Dublin Airport. There is a need for a bus service linking Clongriffin Dart Station to Dublin Airport via the R139. It is noted that a licence for a bus service was granted by the NTA to a private operator in August 2018, but the service has not commenced to date.
- It is required that Objective PT10 be amended to focus on the creation of a public bus transport link between Clongriffin DART Station and Dublin Airport in advance of the development of the East West Link Road. Submission requests amendment to Objective PT10 to read as follows:

'Facilitate provision of stronger connectivity between Dublin Airport and the heavy rail/DART network ~~along existing roads, and to through~~ prioritising public and sustainable transport ~~provision along existing roads serving zoned any future East-West Link Road through~~ development lands at Clonshaugh and Clongriffin. This will support the creation of a public transport only link along any future East-West Link Road.'

- Alongside this required amendment, it is also recommended that a new objective be included in the draft LAP to examine the options and possibilities for a main rail / light rail link from Clongriffin to Dublin Airport.
- Objective PT10 of the draft LAP which references an east-west public transport link only in the context of a new east-west distributor road is challenged. It is proposed that the link could be a rail-link or a bus – only or bus and cycle road.

Delivery of Transport Infrastructure

- In the context of supporting many of the surface access and transport policies and objectives set out in the current draft LAP, the following is recommended in the form of a number of objectives and policy wording changes (italics and underlined):

'to connect Ireland with Dublin Airport', a prerequisite to achieve the high level daa purpose 'to connect Ireland with the World'.

- Railways and Roads
To facilitate proactive opportunities to realise draft LAP policy objectives, the following is recommended:
'FCC DALAP seeks to engage with and utilises the State Authorities (Public Private Partnership Arrangements) Act 2002 to enter into joint ventures.'

To support the need for high quality public transport services - transformational benefits for Dublin Airport are potentially significant, the following is recommended:

'FCC DALAP places a high priority for Dublin Airport to be connected with National, Commuter and Rapid Transit Railway lines.'

- Roads

To relate to Coach, Suburban and Urban Bus services and to facilitate reduction in traffic on the Airport Campus East, plus public transport benefits, the following is recommended:

'FCC DALAP to achieve joined-up access roads directly with the Airport (Cloghran) M1, the Airport (Cherryhound) M2 and Airport (Ballymun) M50 junctions.'

- In addition, the following changes are proposed in Chapter 8 Surface Access and Transport and specifically Section 8.3 Public Transport and Sustainable Transport as follows: 'Dublin Airport has enjoyed considerable success...the forecast period of rising passenger numbers will require concerted action and strategic cooperation across bodies who can deliver including improvements to surface infrastructure and increased public transport service levels. The implementation of MetroLink (or other) by 2027 will add substantial new public transport capacity on the key corridor.

A key outcome of this LAP is to create the environment in which the best possible shifts to sustainable transport mode usage is achieved by engaging in strategic co-operation across bodies. In addition, other proposals exist to provide a rail connection to Dublin Airport (e.g.Metro Dublin). The Local Area Plan acknowledges that alternative proposals may successfully deliver the rail connectivity required, in the time required.

- Section 8.3.2 entitled: Future Public Transport Infrastructure
This key section has short paragraph subsections relating to future public transport provision such as Metrolink, BusConnects and HeavyRail. The following is recommended for inclusion in this section under the following new heading:
Metro Dublin, Metrolink, BusConnects and HeavyRail and to include the following subsection as follows:

- Metro Dublin

'Fingal County Council are open to alternate viable proposals to deliver the much needed sustainable public transport to Dublin Airport and environs. The success of our national airport, and the county as a whole hinges on a viable rail link to the Airport. The sequence of unsuccessful delivery of such a connection through the decades means that alternative delivery programmes and designs need to not just be considered, but urgently pursued by the Airport Authority, Fingal Council and national agencies. To this end, Fingal County Council and this LAP acknowledge the potential of the Metro Dublin scheme to deliver on many of the

objectives of MetroLink, BusConnects and HeavyRail combined. And will liaise closely with Metro Dublin's development team to help realise this infrastructure project.'

- Section 8.3.3

The following is recommended:

MetroLink/MetroDublin: Support NTA, TII and other stakeholders in ensuring that the best solution Metrosystem / MetroLink is delivered as soon as possible and provides the best possible service for all users....

Pedestrian and Cycle Routes

Alongside public transport provision in the form of light rail and bus, cycling and walking is promoted as an alternative sustainable mode of transport to the private car to access the Airport. Given the extensive number of those employed at the Airport, it is required that the travel needs and patterns of those employed needs to be considered. In this regard, a specific study is required as part of the draft LAP to assess the potential to use cycling to meet travel demands. In this context, the Propensity to Cycle Tool (www.pct.bike) is referenced. In the absence of a targeted analysis, specific cycle routes are proposed for inclusion in the LAP such as the Santry River Greenway linking the Airport to a large population to the east and south-east of the M1 Motorway. The draft LAP shall include the Fingal Development Plan objective relating to the provision of walking and cycling access across the M50 along the Metrolink alignment. It is also requested that an objective be included in the draft LAP to provide for access to Dublin Airport for pedestrians and cyclists from Swords, Malahide, Portmarnock, Kinsealy, St. Margaret's, Blanchardstown and Tyrellstown areas.

Noise, Air Pollution and Littering

It is highlighted that existing roads in the vicinity of the Airport are subject to fly-tipping and speeding and in particular local areas such as Meakstown, St Margaret's and Coolquay are used as rat-runs for the Airport. Submissions highlight both day and night time noise from roads in vicinity of the Airport and from local roads and further growth will impact on local communities such as Meakstown. Submissions note the TII's link which shows live data of noise and air quality in Meakstown and other areas. In this context, a strategy is needed to reduce noise and air pollution in these areas. It is recommended that FCC erect noise barriers / land banks to combat road traffic noise from new road infrastructure to protect local residents. It is also requested that FCC postpone new road openings of any future roundabouts until planning permission granted and works ready to commence, in order to stop fly dumping and overnighting of vehicles. Future plans for re-surfacing all roads around the Airport and to monitor air pollution is questioned particularly in the context of airport growth.

Western Access Road

A number of submissions express concern regarding the lack of detail and clarity relating to the proposed Western Access Road to the west of the Airport linking to the N2 / M2. It is requested that local communities be consulted regarding these future strategic roads proposals. Specifically, it is noted that this proposed road infrastructure

impacts on homeowners in the vicinity of St Margaret's. In this regard, proposals for new roadways in the area should consider the impact on the local communities. New road enhancements should ideally be limited to upgrade of the existing road network and additional proposed roads should be sympathetic to the local environmental, heritage and zoning considerations and existing development land uses including agriculture and avoidance of segregation of agricultural lands. A proposed realignment is presented in this regard and proposals outlined for revisions to the alignment of the Western access route. Clarity is also required regarding the location of car parking which this access will serve. Concern is also expressed regarding the lack of mitigation measures regarding the effect of these new roads on the community including noise levels and the combination of road and aircraft noise. Clarity is required as to who is responsible for the management of road noise.

Objective EA3 of the draft LAP which states that the external road network shall be developed on a phased and planned basis is questioned.

A concept development strategy is submitted which sets out the vision for the realisation of Dublin Airport's third terminal, together with a wider integrated vision for the Western Campus and associated western access corridor as an economic hub. A Preliminary Route Options (Western Access) study, informed by preliminary Archaeological and Ecological Assessments, led by DBFL Consulting Engineers supports this proposal.

Impact on Freight

Any road upgrades/improvements must be carried out with minimal impact to protect the operations of the Airport and particularly in the context of freight movements in and out of the Airport. In this regard, reliable and efficient road connectivity to the Airport is critical. It is essential that all road works taking place are designed to minimise disruption to time critical freight operations in the vicinity of the Airport, for example consideration of impact of night time road closure on freight movements. Adequate investment in the surrounding road network is necessary in support of the growth of the cargo sector.

Objective CP2 relating to the efficient use of car-parking and objective CP7 limiting the provision of new car-parking to serve non-core uses with the Dublin Airport zoned lands and the upgrading of roads infrastructure to aid improved public transport movements is supported. It is noted that extensive single level car-parking provision is not conducive to the efficient use of land.

Airport Based Commercial Development

Two opposing views are expressed regarding airport based commercial development at the Airport from a surface access and transportation perspective. A number of submissions contend that non-airport related office development should not be located on the Airport Campus. In this context, activities un-related to the core operations of the Airport, particularly increased office development, is unduly contributing to the unsustainable congestion of the Airport and the main transport arteries to the Airport.

Furthermore, to allow unrestricted commercial development at Dublin Airport runs contrary to regional growth government policy.

On the other hand, it is noted that aligning any future non-aviation related developments such as Dublin Airport Central (DAC) to the implementation of transportation links outside of the control of DAC, appears highly unreasonable. Another submission notes that notwithstanding concerns about surface access bottlenecks outlined in Section 8.4.5 'Airport Based Commercial Development' of the draft LAP, it is considered that selective enterprise growth and employment in non-aviation commercial offices can be achieved sustainably within the DAC on brownfield sites. Submissions state that the proposed caveat preventing further development of the DAC pending the delivery of both Swords CBC and Metrolink as set out in the draft LAP appears unnecessarily restrictive.

Chief Executives Response

Capacity of existing road network and need for public transport

The measures proposed in the draft LAP seek to address the reliance on the eastern access, which in turn leads to reliance on the M1 and M50; and the promotion of improved levels of transport service provision for sustainable modes to serve the Airport. In addition to this, measures to maximise the use of public transport and reduce traffic congestion are included in the draft LAP.

Whilst the licencing of bus services is a matter for the NTA, the LAP seeks to lay the foundations for the future efficient servicing of the Airport campus by all sustainable modes.

The East-West Link Road through lands at Clonsaugh is discussed in the South Fingal Transport Study and its advancement, along with the provision of bus services along any future alignment, would be outside the remit of this LAP.

The LAP recognises that increasing the share of workers using sustainable transport modes to get to and from work at the Airport is the most effective method for decreasing individual car trips. In conjunction with this, the development of Swords in tandem with growth at the Airport provides a sustainable opportunity for modal shift to more sustainable transport movements for airport workers living in Swords. The objectives set out in the draft LAP seek to facilitate this, along with improved connections southwards towards Dublin city.

Traffic and Transport Impact assessments will be required to facilitate any increase in passenger numbers as required in Objectives in Chapter 8 of the draft LAP. Required transport infrastructure will be required to be in place to facilitate increases in passenger numbers.

The SFTS identifies the key infrastructure measures required within Fingal and adjacent areas to tackle existing constraints in transport capacity infrastructure requirements in

the South Fingal area. The measures that have been identified and are relevant have been included in the draft LAP. Objective PT10 provides for provision of connectivity between Dublin Airport and the rail network which has the potential to provide for a rail link to Clongriffin. Objective PT10 as proposed in the draft LAP is considered appropriate and no change is recommended.

Delivery of Transport Infrastructure

Delivery of MetroLink is provided for in the Transport Strategy for the Greater Dublin Area and Project Ireland 2040 (NPF and NDP) and further supported in the RSES for the Eastern and Midlands Region. The objectives contained in the draft LAP are considered to support the delivery of MetroLink and no further changes are considered necessary in this regard.

Pedestrian and Cycle Routes

Objectives relating to cycle infrastructure are included in Section 8.3 of the draft LAP and in particular the need for improvements between Santry and Swords is recognised. The FDP includes an indicative cycle / pedestrian route from Swords along the R132 to the boundary between Fingal and Dublin City to the north of Santry and includes links to the Santry River Greenway. These indicative routes, whilst outside of the LAP boundary, are shown on Fig. 8.1 in the draft LAP. This route is identified as a primary route in the NTA's Greater Dublin Area Cycle Network Plan. FCC supports the implementation of the NTA Cycle Network Plan.

Noise, Air Pollution and Littering

In relation to fly tipping and speeding, these matters are outside of the scope of the LAP. The issues will be brought to the attention of the relevant FCC departments.

In relation to noise from roads, proposed Variation No. 1 to the FDP includes measures to address noise from roads. Any future road proposals will be required to consider noise impacts as part of any planning application.

Western Access

Provision of a Western Access to the Airport is an objective at national, regional and local level, (a western access to Dublin Airport is supported in the National Planning Framework and the RSES for the Eastern and Midlands Region and is specifically provided for in the 2017 FDP in Objective Swords 13 and in Table 7.1 'East West Distributor Road: Stockhole Lane to Cherryhound) alongside the analysis undertaken as part of the South Fingal Transport Study which indicates that a Western Access is likely to be required in the medium term. Given the likely scale of such a project, it will take a number of years to develop. The indicative route for this road is included in the 2017 FDP.

It is acknowledged that the proposals are dealt with in principle and this is appropriate for an LAP such as this. The provision of any future infrastructural developments, including future bus corridors and roads, will all still need to progress through more

detailed feasibility, route options, design and statutory planning processes and more detail will become available as the projects advance through each stage.

Impact on Freight

Impact of road closures and upgrades on freight is noted. This is outside of the scope of the LAP. In relation to road network capacity, transport infrastructure requirements have been considered in detail in the South Fingal Transport Study and the relevant recommendations incorporated into the draft LAP.

Airport Based Commercial Development

Concerns are noted in relation to objective ED02, this is addressed in response to Chapter 6 above.

Recommendation

No change.

12.0 Submissions relating to Chapter 9 – Environment and Community

Chapter 9 Environment and Community

Aircraft Noise

FIN-C239-1, FIN-C239-2, FIN-C239-6, FIN-C239-7, FIN-C239-8, FIN-C239-9, FIN-C239-10, FIN-C239-11, FIN-C239-12, FIN-C239-13, FIN-C239-14, FIN-C239-15, FIN-C239-16, FIN-C239-17, FIN-C239-18, FIN-C239-19, FIN-C239-20, FIN-C239-21, FIN-C239-22, FIN-C239-23, FIN-C239-24, FIN-C239-25, FIN-C239-26, FIN-C239-27, FIN-C239-28, FIN-C239-29, FIN-C239-30, FIN-C239-31, FIN-C239-32, FIN-C239-33, FIN-C239-35, FIN-C239-36, FIN-C239-37, FIN-C239-38, FIN-C239-39, FIN-C239-40, FIN-C239-41, FIN-C239-42, FIN-C239-43, FIN-C239-44, FIN-C239-45, FIN-C239-46, FIN-C239-47, FIN-C239-48, FIN-C239-49, FIN-C239-50, FIN-C239-51, FIN-C239-52, FIN-C239-53, FIN-C239-54, FIN-C239-55, FIN-C239-56, FIN-C239-57, FIN-C239-58, FIN-C239-59, FIN-C239-60, FIN-C239-61, FIN-C239-62, FIN-C239-63, FIN-C239-64, FIN-C239-65, FIN-C239-66, FIN-C239-67, FIN-C239-68, FIN-C239-69, FIN-C239-70, FIN-C239-71, FIN-C239-72, FIN-C239-73, FIN-C239-74, FIN-C239-75, FIN-C239-76, FIN-C239-77, FIN-C239-78, FIN-C239-79, FIN-C239-81, FIN-C239-83, FIN-C239-84, FIN-C239-86, FIN-C239-87, FIN-C239-88, FIN-C239-89, FIN-C239-90, FIN-C239-91, FIN-C239-93, FIN-C239-95, FIN-C239-96, FIN-C239-97, FIN-C239-98, FIN-C239-99, FIN-C239-100, FIN-C239-101, FIN-C239-102, FIN-C239-103, FIN-C239-104, FIN-C239-105, FIN-C239-106, FIN-C239-107, FIN-C239-108, FIN-C239-109, FIN-C239-110, FIN-C239-111, FIN-C239-112, FIN-C239-113, FIN-C239-114, FIN-C239-115, FIN-C239-116, FIN-C239-117, FIN-C239-118, FIN-C239-119, FIN-C239-120, FIN-C239-121, FIN-C239-122, FIN-C239-123, FIN-C239-125, FIN-C239-129, FIN-C239-131, FIN-C239-134, FIN-C239-135, FIN-C239-136, FIN-C239-138, FIN-C239-139, FIN-C239-140, FIN-C239-141, FIN-C239-142, FIN-C239-143, FIN-C239-144, FIN-C239-145, FIN-C239-147, FIN-C239-148, FIN-C239-153, FIN-C239-154, FIN-C239-158, FIN-C239-159, FIN-C239-160, FIN-C239-162, FIN-C239-164, FIN-C239-165, FIN-C239-172, FIN-C239-174, FIN-C239-175

Summary of Comments

- i. Methodology used to prepare Noise Zones
 - a) Questions the methodology used to prepare noise zones relating to Dublin Airport, including the use of noise data for a time period beyond the lifetime of the Dublin Airport LAP, noise metrics used, terminology, source of data, changes between existing and proposed noise zones, requests compliance with WHO guidelines, seeks inclusion of additional areas within noise zones based on current noise levels experienced and requests an independent review of noise zone data
 - b) Queries why noise zones for runway 16/34 are not included in proposed variation.
 - c) Some submissions request that noise zones not be extended whilst others welcome the proposed noise zones and request that residential development be restricted under flight paths
 - d) Refers to the EUs 7th Environment Action Programme (EAP) and queries why FCC is not seeking to decrease noise pollution as outlined in the 7th EAP.

- e) Refers to the Noise Action Plan (NAP) for Dublin Airport and queries the methodology used in preparing NAP including production of strategic noise maps, lack of conformity with legislation and lack of actions arising and queries conclusions relating to changes in exposure to noise between 2006 and 2016
 - o Identification of increased exposure to noise in NAP and requests remedial measures be put in place to address this
 - o NAP should inform land use policy
 - o Highlights the lack of financial penalties for noise infringements and requests performance indicators be provided
 - o Highlights concerns in relation to noise monitoring
 - o Identifies need to include and protect quiet areas in NAP
 - o Seeks to have noise action plan included in the LAP including an update on progress and plans for achieving remaining targets in NAP and that the NAP should be updated to take account of WHO guidelines

- ii. Noise Levels and Impact on Health
 - a) Reference made to existing noise and vibration levels and the noise levels which submissions state will be achieved within proposed aircraft noise zones during day time and night time and concerns that noise levels exceed WHO standards and have a negative impact on health and quality of life. Refers to impact of existing night flights on sleep and resulting sleep disturbance. Noise from roads and light from aircraft are also identified as issues.
 - b) Human health impact of noise and the lack of assessment of the proposed noise zones on human health. Impact of noise on health outlined, including impacts on children and their learning and development and health impacts of sleep disturbance. Submissions consider there is a need to balance economic growth with impact on health and consider impact of aircraft noise on other noise sensitive uses such as schools and sports facilities and concerns that the draft LAP does not sufficiently take account of environmental impact on local communities. A submission notes that noise is amplified by hard surfaces which have replaced what were previously green fields
 - c) Notes that FCC has granted permission under flight paths and should take into consideration impact of noise on these residents in the interests of health and social responsibility which FCC should take responsibility for, includes reference to increased residential density in Portmarnock which is at odds with FCC land use policy relating to noise zones.
 - d) Concerns raised from residents who state they are impacted by flights but who are not identified as being in a flight path and that aircraft are not adhering to flight paths
 - e) • Installation of additional independent Noise Monitoring Terminals (NMTs) at locations north of the Airport which will be affected by the new runway prior to operations to establish a baseline.
 - f) • Implementation of a Webtrak type system to allow residents to accurately identify and easily report distressing Single Noise Events.

- iii. Insulation and Mitigation
 - a) Raises concerns regarding the existing daa operated noise insulation scheme and requests expansion of the scheme to cover additional residences to include insulation and ventilation; noise insulation scheme to take account of WHO guidelines; and a greater involvement by FCC in administration of the current noise insulation scheme and any proposed wider scheme. Request provision of a voluntary relocation scheme, voluntary purchase scheme, and house insulation for residents impacted by aircraft noise and impacted by road proposals in the area including requirement for insulation for all existing residents in noise zones B and C.
 - b) Raise concerns in relation to, and dissatisfaction with, complaints procedure, monitoring and lack of enforcement of night flights and refers to complaints procedures in place at other airports as suggested options for Dublin Airport. Asks that the Aircraft Noise Competent Authority (ACNA) be responsible for dealing with aircraft related noise complaints. Other submissions request that FCC's role as ACNA be designated to an alternative body. Concerns raised in relation to independence of noise monitoring and the regulation of aircraft movements and in relation to locations of existing monitoring stations and requests for additional noise monitoring in specified locations to assist in determining the extent of sound proofing of homes to be provided
 - c) Noise charges for aircraft should be introduced to penalise louder aircraft
- iv. Existing / Future planning applications
 - a) Concerns raised relating to the development of the new north runway at Dublin Airport
 - b) Objections outlined to any increase in flights at Dublin Airport. Call for a restriction on the number of flights at night and object to stated proposals by daa to amend existing operating conditions attached to planning permission for North runway. Increased flights will result in devalued properties. Submit that night restrictions can be in place with a successful airport citing other European examples
 - c) Proposed noise zones do not reflect existing operational conditions attached to planning permission for runway use at Dublin Airport and questions the inclusion of proposed noise zones relating to night noise in the context of the existing planning permission for the north runway at Dublin Airport. Submissions consider that proposed noise zones should reflect existing planning conditions and that these operating restrictions be retained in future planning applications.
 - d) Raises concerns in relation to impact of night flights on population and on Baldoyle Estuary SAC and requests that restrictions be put in place relating to night time flights. Other submissions outline the importance of night flights for operational reasons, in particular in relation to freight and exports and outline the need to support growth and increased capacity at Dublin Airport.
 - e) Raise concerns with procedures relating to operation and role of the Aircraft Noise Competent Authority

- f) Concerns raised in relation to counting of transit passengers – it is submitted that they should be included in passenger numbers
- g) Developers should be required to advise future residents of their location within noise zones
- h) Concerns for safety of people living under flight paths in context of potential aircraft crash
- i) Sustainable development is unrealistic in the context of airport growth

v. *Relocation / impact on residential location*

- a) Difficulties residents in rural noise zones experience relocating outside of noise zones (relates to rural areas) and in close proximity to their family home. Sets out recommendations for alternative locations for those impacted by noise to relocate to, including:
 - o Land should be made available within the locality for residents impacted by noise to move to as there is currently a lack of available alternatives locally, with Thornton Hall identified as a suggested location and that FCC should discuss with Meath County Council the option for Fingal residents to be considered for rural housing in Co. Meath
 - o Requests that residents living within Zone B should also be considered for inclusion in the proposed revised policy relating to rural housing for residents in Zone A (relating to facilitating rural housing need on suitable sites within 5km outside of Zone A).
 - o Coolquay LAP not yet prepared – this is the closest rural village to St. Margaret’s; Housing not provided in Rivermeade LAP
 - o Revised rural housing policy does not address how St. Margaret’s Special Policy Area will facilitate people living in the area to continue to live there
 - o Need to provide for displaced farming families, including provision of alternative farm land
- b) Seeks relocation of residents impacted by noise if night time flights are permitted, with particular emphasis on residents to the west of the airport including St. Margaret’s and The Ward. Other submissions oppose the relocation of residents noting the desire of residents to remain in St. Margaret’s.
- c) Raises concerns that the noise zones have the potential to limit housing that could be provided close to high quality public transport links within the Metropolitan Area

vi. *Consultation*

- a) Submits that public consultation should have been widened to hold public meetings in other areas impacted by noise.

Chief Executive’s Response

Section 9.1 of the draft LAP illustrates noise zones as set out in proposed Variation No. 1 to the FDP. A number of submissions to the draft LAP set out concerns in relation to the proposed noise zones and outline negative impacts of existing aircraft noise. Submissions raise concerns in relation to potential future noise zones at the Airport as a

result of proposals to increase passenger numbers whilst other submissions outline support for the proposed noise zones and support increasing passenger numbers at the airport. The comments relating to noise are addressed under the sub-headings outlined below in response to the summary of issues outlined above. Whilst the revised noise zones are proposed in a Variation to the FDP, it is considered appropriate to address concerns raised in submissions to the draft LAP here having regard to the sustainable growth framework set out in the LAP.

Background to revised Noise Zones

Proposed Variation No. 1 to the FDP has been prepared alongside the draft LAP for Dublin Airport. The proposed Variation provides for the replacement of existing noise zones relating to aircraft noise at Dublin Airport.

A review of the effectiveness and appropriateness of the existing noise zones has been undertaken. This review has concluded that the zones had been effective with respect to their objectives, however when considering more up to date evidence in relation to aircraft noise, it has been concluded that the noise zones should be updated to take into account increased annoyance to aircraft noise at lower noise exposure levels, and to account for night-time aircraft noise exposure which is not currently considered. Based on the outcome of this review the 'inner' and 'outer' noise zones have been reviewed and are proposed to be replaced with four zones, A to D. Zone A reproduces the policy of the existing 'inner' zone whilst Zones B and C are consistent with the objectives of the current 'outer' zone. In addition, Zone D has been introduced in recognition of the noise levels identified in the WHO Environmental Noise Guidelines 2018 (WHO ENG) which identifies the level at which adverse effects start to occur. Zone D also allows for identification of potentially large noise sensitive developments in the vicinity of the flight paths serving the Airport.

Methodology for FCC Noise Zones

The noise zones contained in the current FDP provide for unconstrained use of a parallel runway system at Dublin Airport based on forecast 2025 noise exposure contours. It is now considered appropriate to update these existing noise zones to take account of up to date policy and guidance and to again plan forward for a further time period similar to that which was projected in 2005 in relation to existing noise zones. In this regard, the proposed noise zones are based on 2037 unconstrained runway use. A range of policy options were considered by FCC which included an evidence based framework taking into account historic, current and emerging policy and guidance, legislative framework and the scope of land use policy at other airports. This included a review of the effectiveness of FCC's existing noise zones and highlighted potential changes that may be required to future policy relating to noise zones, including:

a review of the use of alternative noise metrics to the LAeq 16hr (which equates to daytime measurement);

expanding the scope of existing policy to consider night time noise in addition to day time noise; and

recognition of the potential impacts of aircraft noise in areas beyond the outer noise zone and the requirement for its consideration within a revised land use policy.

The following considerations have been used in determining the shape and extent of the noise zones:

Segregated mode and mixed mode contours have been considered in relation to potential future operations at Dublin Airport during the day and night time periods. Segregated mode was chosen as the basis for contours as this sets out the most expansive ultimate exposure, and takes into account potential future changes in operation. The zones have been prepared based on 100% directional conditions to account for potential operating scenarios at Dublin Airport thus providing the greatest degree of safeguarding for land use purposes. These considerations provide for the widest protection of future residents and other noise sensitive land uses potentially impacted by aircraft noise.

The noise zones are based on a conservative combination of possible operational modes for the 2037 forecast flight movements based on calculations undertaken by acoustics experts retained by daa, and reviewed by independent acoustics experts retained by FCC.

The noise zones account for potential future operations at the airport. This is in line with the approach taken in the preparation of the existing noise zones prepared in 2005 by allowing for safeguarding based on unconstrained runway use.

The use of professional guidance in relation to noise and residential development, namely UK guidance ProPG: Planning & Noise – New Residential Development (2017) and other relevant standards such as British Standard BS8233:2014: 'Guidance on sound insulation and noise reduction for buildings' are referenced in the absence of any Irish guidelines in this regard.

The WHO ENG set out noise levels for day time above which aircraft noise is associated with adverse health effects and for night time above which the level is associated with adverse effects on sleep. The WHO guidelines recommend that policy-makers implement suitable measures to reduce noise exposure from aircraft in the population exposed to levels above the guideline values for average and night noise exposure. The current 2017 FDP noise zones do not consider aircraft noise during the night time period. In recognition of the evidence set out in WHO Night Noise Guidelines for Europe 2009 (WHO NNG) and WHO ENG linking health effects with aircraft noise, including noise at night, appropriate noise exposure thresholds for night time have been included in the four noise zones A, B, C and D which include a threshold of 40dB L_{night} in Zone D (WHO ENG defined level at which adverse effects start to occur).

The WHO recommendations were considered as part of the development of the proposed noise zones. There is close comparison between the LA_{eq}, 16 hr values set out in the proposed noise zones and the L_{den} values recommended in the WHO ENG. FCC reviewed the L_{den} values recommended in WHO ENG and matched it to a corresponding LA_{eq}, 16 hr metric for use in the proposed noise zones. This provides for an appropriate comparison between L_{den} (as set out in WHO ENG) and LA_{eq}, 16 hr (as set out in FCC proposed noise zones A, B, C and D). The LA_{eq} 16hr metric was retained for the noise zones as it provides continuity with the existing Inner and Outer Noise Zones. It also provides continuity with the conditions attached to An Bord Pleanála planning permission for the north runway, and it supports the implementation of good acoustic design through guidance within ProPG and BS8233.

The daa forecast aircraft movements for 2037 are based on the operation of a parallel runway system, which is considered to be the most effective use of parallel runways at the airport. Given this constraint to the future use of the crosswind runway, it is not considered appropriate to incorporate this into the noise zones relating to future land use.

Having regard to the methodology outlined in the preparation of the noise zones it is not considered appropriate to extend noise zones to other areas based on submission relating to existing noise experienced in these areas. Noise sensitive uses within the various noise zones will be considered in accordance with noise zones contained in the FDP.

Regarding the EU 7th Environment Action Programme, this programme sets the agenda for developments in both policy and legislation. The Commission proposes policies and legislation in this regard and these policies are reflected in Irish legislation. The existing noise zones have integrated policy on noise into the Fingal Development Plan since 2005. This has resulted in improved outcomes for human health as a consequence of permitted development being appropriately mitigated against noise. The noise zones contained in proposed Variation No. 1 improve upon existing guidance and would ensure that greater gains are achieved to reduce noise impact from air, road and rail upon future development. It is considered that the draft LAP and proposed Variation would have regard to the 7th EAP in ensuring integration of policy into the Development Plan.

The Noise Action Plan for Dublin Airport 2019-2023 (NAP), December 2018, was drawn up under the Environmental Noise Regulations. The draft LAP and Proposed Variation No. 1 to the FDP provide land use planning frameworks for the purposes of effective land-use planning and safeguarding the use of the Airport. The proposed revisions to airport noise zones relating to land-use planning and management set out in the proposed Variation No. 1 are based on potential forecast noise levels which may arise under unconstrained operations in 2037. This is considered an appropriate basis for long term management of noise sensitive developments at the airport. The strategic noise maps from the NAP are based upon an assessment of the annual average noise exposure which was experienced at the airport during 2016. These are used to inform the ongoing management of noise from the airport as set out within the NAP. The actions set out in the NAP relating to Land Use Planning and Management seek to review existing land use planning frameworks in so far as they relate to Dublin Airport and to monitor encroachment associated with Dublin Airport to ensure that airport noise policy is appropriately informed through land use planning. This proposed Variation and the draft Dublin Airport Local Area Plan set out land use planning frameworks in this regard. Proposed Variation No. 1 to the FDP and the draft Dublin Airport LAP have been prepared, in part, to deliver on Action 3 in Table 10 of the NAP. The Noise Action Plan maps the current situation with regard to aircraft noise whilst the proposed Variation sets out noise zones relating to potential future aircraft noise. These are different processes with responsibility for mapping different scenarios, which have used the same methodology relating to noise measurements. The NAP was adopted in December 2018 following a period of public consultation. The consideration of the content of the NAP is outside of the scope of the draft LAP.

Noise Levels and Impact on Health

Concerns relating to existing noise and vibration levels are noted, procedures are in place for dealing with complaints which are outside of the scope of the draft LAP. The WHO Environmental Noise Guidelines 2018 have been taken into account during the development of the noise zones set out in proposed Variation No. 1 to the FDP for the management of future planning applications in the vicinity of the airport.

In relation to the impact on human health the proposed noise zones associated with the airport are for the purpose of assessment and guidance of planning applications for future development. They are for the purpose of safeguarding future development proposals from the impacts of noise on human health, and incorporating updated guidance on noise impact. The impact of proposed amendments to operations at Dublin Airport can only be undertaken by assessment of a planning application along with any accompanying environmental information. The draft LAP and proposed Variation No. 1 to the FDP recognise the need to balance sustainable growth of the airport with the impact on the environment and communities. For this reason revised noise zones are proposed which provide for the protection of future residential and other noise sensitive uses in the vicinity of the airport. In relation to existing noise sensitive uses, any proposed changes to operating conditions at Dublin Airport will require a planning application which will be required to consider impacts on noise sensitive uses and provide for appropriate mitigation. Any mitigation measures will need to be considered as part of future planning applications relating to any changes in operating conditions at Dublin Airport and in accordance, where relevant, with noise related mitigation measures identified by the ANCA.

The existing noise zones within the FDP have provided for consideration of noise impacts in planning applications, including recent permitted development in Portmarnock and other areas located in the outer noise zone which would have required noise mitigation as a condition of planning permission in areas impacted by noise. The proposed revised noise zones provide for an updated policy to protect future residents and other noise sensitive uses.

Review of existing noise levels, noise monitoring stations and Webtrak is outside of the scope of the draft LAP. A complaints procedure is in place in relation to aircraft failure to adhere to flight paths.

Insulation and Mitigation

The noise insulation scheme has been established in compliance with Condition 7 of the An Bord Pleanála decision to approve the development of the north runway. It includes a requirement to review the dwellings eligible for insulation under the scheme every two years. It is not within the remit of the draft LAP to amend the house insulation scheme, such amendments can only be provided for by way of a future planning application relating to operations at Dublin Airport and any noise related documents submitted with that planning application. The voluntary house purchase scheme has been established in compliance with Condition 9 of the An Bord Pleanála decision to approve the development of the north runway. It is not within the remit of the draft LAP to amend the scheme, such amendments can only be provided for by way of a future planning application relating to operations at Dublin Airport.

The role of FCC as Aircraft Noise Competent Authority (ANCA) is set out within the Aircraft Noise (Dublin Airport) Regulations Act 2019 which has now been enacted. The role of FCC as ANCA is set out within the Aircraft Noise (Dublin Airport) Regulation Act 2019 as an independent authority with exclusive competence to impose, revoke, replace or amend, and monitor operating restrictions at the airport. The noise complaints process is outside of the scope of the draft LAP. In relation to the requirement for additional monitoring and flight tracking, this is not a matter for a land use plan. Introduction of noise related penalties is outside the scope of the draft LAP.

Existing / Future planning applications

In relation to concerns relating to the development of a new runway at Dublin Airport, the proposed north runway is currently under construction having been granted permission by FCC and An Bord Pleanala and cannot be reconsidered as part of the draft LAP.

Any change to operating conditions at Dublin Airport can only be considered as part of a planning application including any proposed changes to night flights.

In relation to differences between noise associated with the planning permission for the north runway and the noise zones set out in proposed Variation No 1 to the FDP, the proposed Variation noise zones are to be utilised for the safeguarding and protection of future noise sensitive development from potential future operations which may or may not occur. In this regard, to include objectives in the draft LAP to omit night-time flights, or to apply the conditions of the northern runway would not facilitate this objective and would potentially lead to ineffective safeguarding and for noise sensitive development to be inappropriately located.

There are currently no restrictions on night movements at the airport. Following commencement of operations on the North Runway, Condition 5 of the An Bord Pleanala decision for approval restricts the number of night movements at the airport to 65, and Condition 3(d) states that the North runway shall not be used for night movements. The draft LAP does not include proposals to change these Conditions. In relation to night time operations of aircraft, this can only be addressed as part of any planning permission and any operating restrictions at Dublin Airport must be provided for by the Aircraft Noise Competent Authority after a prescribed public consultation process. The submission of a planning application to amend or remove any conditions would include assessment of environmental impact and impact on European Sites. The draft LAP is not a consent process for night time flights.

The role of FCC as Aircraft Noise Competent Authority (ANCA) is set out within the Aircraft Noise (Dublin Airport) Regulations Act 2019 which has now been enacted.

Any proposal to increase passenger numbers at Dublin Airport will require a planning application which will be required to address the breakdown in passenger type. Counting of transit passengers is undertaken via an agreed methodology which is set out by the CSO.

In relation to the suggested requirement for developers to advise of a developments location within noise zones, details of the noise zones are publicly available.

The FDP includes Public Safety Zones and these are considered as part of any planning application for development proposed in proximity to Dublin Airport.

Any future development relating to increased passenger numbers at Dublin Airport or changes to operational use of runways will need to include environmental assessments where relevant and to consider appropriate mitigation measures to ensure the sustainability of any development proposals. This draft LAP includes an SEA Environmental Report which has guided the preparation of the draft LAP and sets out mitigation measures.

Relocation / impact on residential location

The difficulties faced by residents in rural areas surrounding the area as a result of airport operations are noted. The proposed Variation No. 1 to the FDP which has been prepared alongside this draft LAP sets out proposals to increase the rural area within which those living within noise zones on rural zoned lands may be considered for an alternative dwelling subject to compliance with the rural settlement strategy.

Lands at Thornton Hall are not zoned for residential development and are not in the ownership of FCC. The consideration of this land for residential use is outside of the scope of this proposed LAP

Implementation of the rural settlement policy for the administrative area of Meath County Council is a matter for that Planning Authority.

Regarding the inclusion of residents within Zone B into the increased area for suitable rural housing sites, this is a matter for consideration in proposed Variation No. 1 and has been addressed in the CE report relating to the proposed Variation. It is noted that it is not considered necessary as there are no noise zone related restrictions on housing in Zone B, unlike those in Zone A.

Having regard to comments on Coolquay and Rivermeade, both are zoned Rural Village – RV. A LAP for Rivermeade was adopted in 2018. There is no requirement that lands for development in these RV zones be retained for rural related housing demand such as that which may be generated proximate to the Airport.

St. Margaret's Village is located within the inner noise zone and it is not proposed to provide for additional residential development in the area. St Margaret's SPA policy included in Appendix 1 in the draft LAP seeks to improve the existing village environment.

Existing planning permission for the north runway includes a buy-out scheme for residents within impacted areas. Any future planning application relating to operations at Dublin Airport will consider the potential impact of noise on residents.

Any potential future planning application to change operational conditions at Dublin Airport, including any change to the number of flights proposed at night time, will be required to address the impact on residents in the vicinity of the airport. The existing noise insulation scheme has been established in compliance with Condition 7 of the An Bord Pleanála decision to approve the development of the North Runway. It includes a requirement to review the dwellings eligible for insulation under the scheme every two years. Any property newly found to fall within the contour of 63 dB LAeq 16hr following this review would become eligible for an offer of voluntary noise insulation.

In relation to the impact of the noise zones on existing residential zoned lands, this relates to proposed Variation No. 1 to the FDP. It is noted that Zone B and Zone C do not propose any restrictions in terms of the quantity of development proposed, rather they propose mitigation measures relating to noise. FCC recognises that Zone B and Zone C extend over areas located on high quality public transport links and within the Metropolitan Area which are suitable for future development.

Consultation

The issues raised are noted. A comprehensive public consultation process was undertaken during the public display of the draft LAP, including publication of notices in newspapers, provision of documentation at all Fingal County Council offices, and at all FCC libraries; a general and targeted social media campaign (Facebook and Twitter) advising of public meetings and dates for submissions to be made; briefing sessions for Elected Members and two public information evenings in Swords and at Dublin Airport.

Recommendation

No change.

Foul Drainage

FIN-C239-174

Summary of Comments

- It is suggested that the daa provide for and operate its own waste water treatment plant to facilitate the growth of the Airport.

Chief Executive's Response

Multiple projects are currently being progressed by Irish Water to deliver the infrastructure and capacity necessary for predicted population growth within the Dublin Region. Any increased water demand or foul discharge from the plan lands will be contingent on the constraints of the Irish Water Capital Investment Programme and the approval of Irish Water. The growth of Dublin Airport will be subject to the progress of the various improvement works and subject to the agreement of Irish Water.

In particular, the following key projects are applicable to Dublin Airport.

1. Ringsend Wastewater Treatment Plant upgrade – The Ringsend Wastewater Treatment Plant is currently overloaded. An application for the upgrade was lodged with An Bord Pleanala in June 2018 and granted permission in April 2019. Upgrade works are scheduled to increase the treatment capacity from 1.64 million p.e. to 2.4 million p.e. This upgrade is currently programmed to be complete in 2025.

2. Greater Dublin Drainage Project – Planning application lodged with An Bord Pleanala in 2018, oral hearing held in March 2019 and consent granted in November 2019.

Recommendation

No change.

Summary of Comments

- Concern is expressed that the Airport is engaging in the distribution of surface water to streams in the area including Forrest Little Stream, Wad Stream, Kealy's Stream and the Cuckoo River which all impact on flooding downstream in the Sluice and Moyne Rivers. Improved attenuation is required and the removal of pollutants is a key issue. The inclusion of Objectives FRM01-04 relating to flood risk management in the draft LAP is welcomed

Chief Executive's Response

A Flood Risk Assessment and a Surface Water Management Plan have been undertaken with the draft LAP which identify areas of concern regarding flooding and surface water attenuation and discharge. The draft LAP contains objectives SW01 – SW08 which require provision of SuDS for new development and existing development in addition to restrictions proximate to riparian areas which would improve SuDS and water quality. Furthermore, amendment to SWQ01 to ensure that new development complies with the Water Framework Directive will strengthen the aim of the policy to ensure that water quality is maintained and improved.

Recommendation

Amend Text within Section 9.5 as follows;

'Future development should comply with the Dublin Airport Local Area Plan and Surface Water Management Plan objectives to ensure any impacts on water quality will be positive. *All discharges to surface water and to ground water must support compliance with the European Communities European Objectives (Surface Waters) Regulations 2009 and with the European Communities (Groundwater) Regulations 2010 respectively, both of which give effect to the Water Framework Directive. Improvement of surface water quality is expected through implementation of SuDS Objectives.'*

Amend Objective SWQ01 as follows;

'Applications for development shall demonstrate that they comply with the Water Framework Directive will not deteriorate the status of either surface or ground water bodies. Where appropriate, permissions shall be conditioned to require the developer to undertake actions in order to improve the status of water bodies, in line with the Water Framework Directive.'

Surface Water Quality
FIN-C239-83, FIN-C239-159

Summary of Comments

- Concern is expressed that the draft LAP addresses water quality in general terms only.

- The draft LAP shall include the measures necessary to achieve good status in the waterbodies in the area, in accordance with the requirements of the Water Framework Directive.

Chief Executive's Response

A Flood Risk Assessment and a Surface Water Management Plan have been undertaken with the draft LAP which identify areas of concern regarding flooding and surface water attenuation and discharge. The draft LAP contains objectives SW01 – SW08 which require provision of SuDS for new development and existing development in addition to restrictions proximate to riparian areas which would improve SuDS and water quality. Furthermore, amendment to SWQ01 to ensure that new development complies with the Water Framework Directive will strengthen the aim of the policy to ensure that water quality is maintained and improved. Objective SWQ01 and SWQ02 sets out compliance with the Water Framework Directive, the River Basin Management Plan for Ireland and the Associated Programme of Measures (second cycle). It also makes provision for the third cycle to be utilised when needed. It is considered that the contents of the policies adequately set out the measures required for the rivers serving the draft LAP lands.

Recommendation

Amend Text within Section 9.5 as follows;

'Future development should comply with the Dublin Airport Local Area Plan and Surface Water Management Plan objectives to ensure any impacts on water quality will be positive. All discharges to surface water and to ground water must support compliance with the European Communities European Objectives (Surface Waters) Regulations 2009 and with the European Communities (Groundwater) Regulations 2010 respectively, both of which give effect to the Water Framework Directive. Improvement of surface water quality is expected through implementation of SuDS Objectives.'

Amend Objective SWQ01 as follows;

'Applications for development shall demonstrate that they comply with the Water Framework Directive ~~will not deteriorate the status of either surface or ground water bodies~~. Where appropriate, permissions shall be conditioned to require the developer to undertake actions in order to improve the status of water bodies, in line with the Water Framework Directive.'

Air Quality

FIN-C239-60, FIN-C239-70, FIN-C239-97, FIN-C239-111, FIN-C239-120, FIN-C239-149, FIN-C239-174, FIN-C239-160

Summary of Comments

- Need for additional air quality monitoring in communities surrounding the Airport and measures to reduce and limit pollutants must be included in conditions attached to any grant of permission. Notes PM2.5 monitoring is not carried out by daa.
- Request that EPA take over role of monitoring pollutants in vicinity of airport.

- NOx emissions to be considered in the draft LAP.

Chief Executives Response

As outlined on the EPA website “The Environmental Protection Agency manages the national ambient air quality monitoring network” “The four local authorities in the Dublin region took the initiative to produce a regional air quality management plan covering the 2009-2012 period. This plan is primarily directed at protecting the valuable asset of good air quality in the region and particularly of ensuring that adverse air quality does not impact on the most vulnerable of the population whether their vulnerability is due to occupation, age, existing health conditions or other factors.”

As per the EPA Air quality report 2018 the levels at monitoring sites in Ireland were below the EU legislative limit values in 2018. The Environmental Protection Agency's Air Quality Index for Health (AQIH) for the Dublin City Region is currently rated as Good. The attached link will identify the map outlining the AQIH for Ireland <http://www.epa.ie/air/quality/>

The draft LAP recognises that emissions can have an impact on surrounding environments. This includes NOx/Nitrous Oxide and PM 2.5. PM 2.5 is not currently recorded as a requirement of planning permissions at the airport. It is considered that the review of air quality monitoring at the airport as set out in AQ05 would facilitate discussion on parameters to be included, in discussion with stakeholders, including daa and the EPA.

Recommendation

No change.

Built and Natural Heritage
FIN-C239-123

Summary of Comments

- Concern is expressed that Section 9.8.2 ‘Architectural Heritage’ of the draft LAP fails to consider the impact of airport growth on protected structures that fall within noise zones. It is requested that an independent study be carried out to assess the impact of additional aircraft’s movements, noise, vibration and pollution on architectural heritage in areas falling within noise zones. This study shall be carried out by independent experts and include clear recommendations to guide FCC in the mitigation of any adverse impacts on architectural heritage in the context of additional aircraft movements and to provide guidance on any possible aircraft restrictions necessary to protect local architectural heritage.

Chief Executive's Response

The FDP 2017-2023 at Chapter 10 Cultural Heritage is explicit in promoting and facilitating the protection of the County's architectural heritage and includes a number of objectives in this regard. The current record of protected structures is included within Appendix 2 of the FDP 2017-2023. Part IV of the Planning and Development Act 2000 (as amended) provides the legal basis for the conservation and enhancement of architectural heritage within the County. The draft LAP through objectives AH1 to AH3 seeks to protect architectural heritage within and adjoining the Airport lands. Any future development proposals in the context of airport growth will be analysed within the provisions of the FDP 2017-2023 and the draft LAP including the relevant legislation relating to the protection of architectural heritage through the Development Management process.

Recommendation

No change.

Community Engagement

FIN-C239-123, FIN-C239-120

Summary of Comments

- The need for the Airport growth is acknowledged however, this growth, should occur in collaboration with local communities and not to the detriment of existing communities. In this regard, robust consideration by relevant stakeholders towards neighbouring communities is considered essential from an airport growth perspective. The high level community support objectives set out in Section 9.9.1 of the draft LAP are cited with specific reference to objectives CS1 and CS2. These objectives seek continual engagement between FCC, other relevant stakeholders and local communities in the context of airport growth. Concern is expressed that the spirit of these objectives as they relate to engagement between relevant stakeholders and local communities has not fully occurred to date.
- The merit of the Community Liaison Group is also questioned in this regard. It is also noted that key relevant stakeholders did not attend public consultations events hosted by FCC on Wednesday 18th September and Tuesday 1st October 2019 regarding the draft LAP. Full and meaningful engagement on behalf of all relevant stakeholders with local communities including adequate mitigation is considered essential in the context of airport growth.

Chief Executive's Response

The draft LAP acknowledges the extensive residential areas located within the vicinity of the Airport. In this regard, the strategic aims and objectives of the draft LAP recognises the need to ensure that community impact is appropriately considered in the context of airport growth. A key strategic aim of the draft LAP set out at Chapter 4 seeks to, 'Safeguard the current and future operational, safety, and technical requirements of Dublin Airport and provide for its ongoing development within a sustainable

development framework of a Local Area Plan. The plan shall take account of any potential impact on local communities and shall have regard to any wider environmental issues.'

In this regard, the draft LAP acknowledges that the growth of the airport must be planned to take account of potential impacts on the airport's neighbouring communities and on the environment. The draft LAP considers the environmental effects associated with airport growth at global level (the need to reduce emissions, tackle climate change and build resilience to the impacts of climate change) and at local level (noise, air quality, water quality, waste, traffic, natural and built heritage and community).

The draft LAP at Chapter 9 Environment and Community acknowledges that active involvement by affected local communities and a wide range of other stakeholders is an essential part of the process of establishing and maintaining sustainable airport growth. The preparation of the draft LAP involved direct community engagement with representatives from St. Margaret's which lies immediately to the west of the Airport lands in the context of developing a strategy for the area. Appendix 1 refers in this regard and includes proposals for potential environmental and socio-cultural enhancements. Specifically, Chapter 9 recognises the integral role neighbouring communities have to play in facilitating Dublin Airport's success and in determining how best to balance the needs of these neighbouring communities against future airport growth. Objectives CS1 – CS3 of the draft LAP at Chapter 9 promotes and facilitates continual engagement between key stakeholders and local communities in this regard. The draft LAP includes measures intended to mitigate and manage environmental effects. Chapter 9 Environment and Community includes a number of objectives in this regard. Chapter 5 Transition to a Low Carbon Economy places a strong emphasis on contributing towards carbon reduction within areas which can be addressed in the planning process. A number of specific objectives CA01-CA06 are included in the draft LAP in this regard.

Proposed Variation No. 1 provides for revised aircraft noise zones to protect future residential and other noise sensitive uses in the vicinity of Dublin Airport to manage conflict between aviation noise and noise sensitive uses. It also proposes to increase the rural area within which those with a rural housing need who currently live within the noise zone most impacted by noise can relocate to. The Noise Action Plan for Dublin Airport 2019-23 (recently adopted in Dec 2018) is designed to manage noise issues and effects associated with existing operations at Dublin Airport.

Despite concerns raised, the Community Liaison Group provides an important platform to further engagement between FCC, the daa and nearby communities to communicate in an open and transparent manner in the context of airport growth and operations. The draft LAP recognises that a transparent and inclusive approach is considered vital to ensuring that concerns about future development of the Airport can be addressed at the earliest opportunity between relevant airport stakeholders and communities.

The draft LAP has been prepared by FCC in accordance with Objective ED97 of the Fingal Development Plan 2017-2023 which requires the preparation of a Local Area Plan

for Dublin Airport in collaboration with key stakeholders, relevant agencies, sectoral representatives and local communities during the lifetime of this development plan. It is noted that while key stakeholders are integral to the preparation of the draft LAP, there is no specific statutory requirement for key relevant stakeholders to attend public consultation events hosted by FCC.

In conclusion, Fingal County Council recognises the need for ongoing and continued engagement with neighbouring airport communities throughout the period of growth envisaged over the life of this LAP. This engagement is essential to ensure that the environmental impacts associated with the development proposals are carefully managed and mitigated through land use planning and environmental monitoring and review processes. In this regard, Fingal County Council is fully committed to the continual engagement with local communities that are likely to be affected by airport growth with a view to ensuring their concerns are understood and appropriate mitigation proposals implemented where required.

Recommendation

No change.

13.0 Submissions relating to Appendix 1- Strategy for St. Margaret's Special Policy Area

Appendix 1 Strategy for St. Margaret's Special Policy Area

FIN-C239-97, FIN-C239-107, FIN-C239-111, FIN-C239-117, FIN-C239-120, FIN-C239-123, FIN-C239-132, FIN-C239-143, FIN-C239-144

Summary of Comments

Community and Recreational Amenity

- Concern is expressed that continued airport growth has resulted in the gradual erosion of the communities of St. Margaret' and The Ward including its facilities. The strategy for St. Margaret's is welcomed in this regard. However, it does not include consideration of mitigation measures associated with aircraft noise in the wider St. Margaret's area including The Ward community.
- It is requested that all relevant stakeholders commit to supporting the existing remaining residents of St. Margaret including key existing recreational facilities and develop tangible proposals for the improvement of St. Margaret's and its amenities including accessibility to local healthcare facilities particularly for elderly residents.
- The important and central role that St. Margaret's GAA Club plays in the lives of the existing community and the wider area is highlighted. The development works that has occurred within the club in recent times to make it a well-equipped modern facility is also further highlighted. It is requested that the existing club be preserved in its entirety and protected, particularly from airport expansion plans including future strategic roads proposals and aircraft noise. It is further noted that the existing GAA club will benefit from improved pedestrian connectivity between the club and the centre of St. Margaret's and Rivermeade. A new objective is proposed in this regard for inclusion in the existing strategy for St. Margaret's Special Policy Area as follows:

'Objective CF6 'To provide footpath and cycle paths between Rivermeade Estate to the St. Margaret's GAA and community complex and to the St. Margaret's Special Policy Area to ensure safe connectivity within the community'.

- The merit of locating a high quality open space in the vicinity of the school is questioned specifically in the context of existing aircraft noise which would render it unsafe for use by local children.

Built Heritage

- Preservation of the built heritage assets of the area is seen as a key priority for the local community and it is requested that the built heritage features be protected to the fullest extent possible including as yet undiscovered archaeological remains, in the context of future strategic roads infrastructure and aircraft noise. Concern is expressed regarding the development of the

parochial hall as a heritage centre. It is requested that the old Windmill within the townland of Millhead be preserved.

Housing Provision in the context of Inner Airport Noise Zone

- One of the foremost concerns identified in submissions relates to the current housing restrictions as they relate to the Airport Inner Noise Zone where new housing for non-farm family members is actively resisted. Submissions contend that the proposed strategy for Margaret's including the increase in the area where housing can be considered for non-farm family members outside the Airport Inner Noise Zone as proposed in Variation 1 of the FDP is not sufficient to address housing need within the area. It is recommended that FCC appoint a dedicated point of contact to support and guide existing residents who wish to relocate outside the inner noise zone. It is further recommended that FCC liaise with Meath County Council on this matter in the context of relocation within County Meath. Options identified in view of these current restrictions include the designation of a new alternative location within the rural zoned lands of the north County namely Thornton Hall to cater for the future housing needs of St. Margaret's. The location of Coolquay village to St. Margaret's is noted as a possible alternative for relocation, however, the current status of the Coolquay LAP which is pending is questioned. The lack of serviced sites for sale within this area including Rivermeade is highlighted. It is recommended that FCC be proactive in assisting those wishing to relocate outside the inner noise zone.

Chief Executive's Response

As part of the review of the Dublin Airport Local Area Plan, Fingal County Council prepared a strategy for the 'Special Policy Area' of St. Margaret's within the provisions of the current FDP 2017-2023. Local Objective 61 seeks to, 'Prepare a strategy for St. Margaret's Special Policy Area' and Objective DA28 seeks to, 'Prepare a strategy for 'St. Margaret's Special Policy Area' involving consultation between the existing community, Fingal County Council and the Dublin Airport Authority.' In this context, the study area as set out in the FDP 2017-2023 for the St. Margaret's Special Policy Area was adhered to and in this regard, a strategy was prepared for this area as set out in Appendix 1 of the draft LAP.

The overall aim of this strategy is to provide guidance, outlining the potentials of the policy area and the possible ways that those potentials may be realised with an end goal to enhance the physical environment and to improve the socio-cultural aspects of the community in the short and medium-term. Specifically, the focus areas identified for community and environmental enhancement will instigate discussion and allow their detailed development through a future 'Local Enhancement Action Plan' [LEAP] between FCC, the local community and relevant stakeholders. This plan will also address priority actions, funding options and a realistic delivery programme which is considered essential to the success of environmental and community projects. The delivery of such projects will require the attention and co-operation of community representatives, various property owners, Fingal County Council and other relevant stakeholders.

Consideration will be given to public/private joint ventures where community projects could benefit from adjoining private lands.

This strategy acknowledges the important role that the existing St. Margaret's GAA Club plays in the lives of the existing community and the wider area. It is noted that indicative roads proposals as proposed in the FDP 2017-2023 in the area will be subject to a separate statutory procedure which will involve statutory public consultation, affording the opportunity to the community of St. Margaret's including representatives from St. Margaret's GAA Club to engage within this process. The FDP 2017 - 2023, supported by proposed Variation 1 sets out land use planning policies and objectives relating to management of conflict between aviation noise and noise sensitive uses around the Airport.

The strategy also recognises that ease of movement within and around St. Margaret's is vital to building an attractive, safe and user-friendly public realm. It is acknowledged within the strategy that a key challenge for the area is the creation of a pleasant and accessible walking environment. Specifically, Objective IL1 of the strategy seeks to, 'Examine the feasibility of improved pedestrian linkages and circulation routes within St. Margaret's.' One of the new route options identified during consultation with the local community in the development of the strategy included the creation of a new pedestrian link between St. Margaret's GAA Club and the centre of St. Margaret's. The feasibility of this route will be explored as part of the future LEAP including the assessment and feasibility of other potential linkages to the area in consultation with the community and other relevant stakeholders. It is considered that the feasibility of such routes should occur in the first instance in accordance with Objective IL1 to determine the potential of developing such routes given the multiple issues involved in developing and delivering such routes. It is therefore considered premature in the absence of feasibility assessment to include objectives in the draft LAP for specific routes connecting to St. Margaret's.

Regarding accessibility to health care facilities, the strategy for St. Margaret's includes specific objectives for improved public transport connectivity between St. Margaret's and the wider area to local towns and villages. In particular, the strategy promotes and facilitates connectivity between Swords and St. Margaret's to access public services, health, social facilities and other services. In this regard, there is potential to extend the existing 'local link' from Swords Town centre to Knocksedan to St. Margaret's and surrounding areas. The local communities role in pursuing such an extension of this local service is acknowledged.

Specifically, Objective IL3 seeks to, 'Support and encourage public transport providers to enhance the provision of public transportation services to St. Margaret's and to support and facilitate rural community transport initiatives where possible, aimed at providing new services through the area, enhancing and expanding existing services.'

Regarding the potential for the provision of public open space in the vicinity of the existing primary school, the LEAP will involve further analysis as to the suitability and

feasibility of new public open space provision within St. Margaret's in consultation with the local community and other relevant stakeholders.

A key strategic aim of the strategy for St. Margaret's is the protection and promotion of the built heritage features that contributes to the identity of St. Margaret's. The strategy acknowledges the rich history and the wealth of built heritage assets that contributes to the local character and sense of identity of the area. Specifically, the strategy lists the built heritage assets of the area and includes a number of specific objectives for the protection and enhancement of the built heritage of the area. In the interests of clarity, the strategy is not proposing to develop the existing Parochial Hall as a heritage centre but rather potentially enhancing the existing hall for future community uses which will be further explored with the community and other relevant stakeholders through the future LEAP. It is noted that the old Windmill within the townland of Millhead is a Protected Structure 0628 as set out in Appendix 2 'Record of Protected Structures' of the FDP 2017-2023.

The issue of housing provision in the context of the inner noise zone is effectively dealt with through the CE Report relating to proposed Variation 1 of the FDP 2017 – 2023. It is noted that there is a guidance mechanism in place as part of the Development Management process where pre-planning meetings with area planners can be availed of in relation to any potential planning applications for relocation outside the inner noise zone.

Lands at Thornton Hall are not zoned for residential development and are not in the ownership of FCC. The consideration of this land for residential use is outside of the scope of this draft LAP. Notwithstanding there is a sufficient quantum of readily available and serviced zoned lands available within Fingal's Rural Villages and Rural Clusters across the County [as detailed in Section 1.7 Housing and St. Margaret's Special Policy Area of Appendix 1 of the draft plan] offering an attractive housing alternative and a wide choice of residential accommodation including larger serviced sites. Implementation of the rural settlement policy for the administrative area of Meath County Council is a matter for that Planning Authority.

In terms of the preparation of an LAP for Coolquay, the FDP 2017-2023 indicates in Chapter 5 'Rural Fingal' and specifically Section 5.2 'Rural Villages in the Metropolitan Area' that an LAP for Coolquay village will be prepared in the lifetime of the development plan. Rivermeade LAP was adopted in 2018 with an expiry date of May 2024 which identifies serviced zoned lands offering an attractive housing alternative and a wide choice of residential accommodation including larger serviced sites. The market issues surrounding the availability and sale of serviced sites is outside the remit of the draft LAP and the role of the Planning Authority.

Recommendation

No change.

14.0 Submissions relating to Appendix 4 – Strategic Environmental Assessment

Appendix 4 Strategic Environmental Assessment

FIN-C239-120, FIN-C239-149, FIN-C239-156

Summary of Comments

- Reference is made to SEA Screening in the Noise Action Plan process and how SEA was not required for a Noise Action Plan is questioned.
- Submissions refer to inclusion in draft LAP of reference to legally binding agreement to limit global warming and state that there is no such legal requirement and that the Paris Accord aspired to keeping temperature rise below 2°C.
- Raise concerns that there is not sufficient manufacture of lithium-ion batteries to support adequate number of fully electric cars in Ireland by 2030
- One submission specifically refers to the following Sections of the SEA-
 - 4.9.5 - Environmental Baseline, Air and Climatic Factors- Noise,
 - 4.9.6 - Existing Problems,
 - Appendix II Noise Directive (2002/49/EC)
 - Section 4.11.1 Archaeological Heritage
 - Section 4.11.2 Architectural Heritage
 - Table 10.1 Selected Indicators, Targets and Monitoring Sources SEO 8
 - 4.12.2 Land and Property
 - Table 5.1 Strategic Environmental Objectives (SEOs), Indicators and Targets
 - 6.3.1 Alternative Growth Scenarios for Passenger Numbers and Footnote 45
 - 6.3.2 Alternatives for Managing Airport Service Levels
 - 6.3.3 Alternatives for a Community Strategy for St. Margaret's
 - 7.2 Methodology
 - 7.3 Cumulative Effects
 - 7.4.4 Alternatives for a Community Strategy for St. Margaret's
 - 8.5.4 Chapter 7 Airport Infrastructure- A number of objectives
 - 8.5.6 Chapter 9 Environment and Community- Appendix I Strategy for St. Margaret's Special Policy Area- A number of objectives
 - 4.8.9 Existing Problems- flood risk
 - 4.5.4 Habitat Survey

Chief Executive's Response

In relation to SEA process relating to Noise Action Plans, this is outside of the scope of this draft LAP.

Regarding the Paris Accord agreement, this text from the LAP (which is also referenced in the SEA Environmental Report) has been informed by information from the European

Union https://ec.europa.eu/clima/policies/international/negotiations/paris_en This information from the EU states that at the Paris climate conference (COP21) in December 2015, 195 countries adopted the first-ever universal, legally binding global climate deal. The agreement sets out a global action plan to put the world on track to avoid dangerous climate change by limiting global warming to well below 2°C and pursuing efforts to limit it to 1.5°C.

Concerns regarding manufacture of lithium-ion batteries are outside of the scope of this process.

In relation to the points raised regarding the content of the SEA, the SEA has been undertaken in compliance with the SEA Directive and provides a strategic assessment of the likely significant environmental effects of implementing the Plan. The findings of the SEA to date are provided in the SEA Environmental Report that accompanied the Draft Plan on public display. The SEA Environmental Report includes the information that is reasonably required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

In relation to points raised in relation to examining emissions in the SEA, the timing of CO₂ emissions did not have implications for the SEA.

The assessment took into account noise, including night time noise. This included the information in the Noise Action Plan for Dublin Airport 2019-2023 (Fingal County Council, 2018) that: "The results of the noise mapping and other relevant sources of information indicate that noise from Dublin Airport has increased since 2011 along with the number of people exposed to aircraft noise. These increases are due to both the airport's continued growth and apparent encroachment in the vicinity of the airport. The results of the mapping also indicate an increase in night-time noise exposure both as a result of the airport and the apparent encroachment...."

In relation to alternatives, the alternatives included in the SEA Environmental Report are assessed for various issues including noise. The SEA Directive requires that reasonable alternatives (taking into account the objectives and the geographical scope of the plan or programme) are identified, described and evaluated for their likely significant effects on the environment. The SEA Environmental Report provides a comparative evaluation of the environmental effects of implementing the alternatives for the Plan.

In relation to comments regarding the SEA and Screening Assessment impact on habitats, the SEA Environmental Report does not identify (as stated in submission) that the LAP will have a 'devastating' impact on the habitat of birds and mammals. Table 8.3 of the SEA Environmental Report provides the overall findings of the assessment. Table 8.3 identifies the significant positive effects likely to occur with respect to "Biodiversity and Flora and Fauna" as a result of implementing the Plan, in combination with the wider planning framework. Potential Significant Adverse Effects, if unmitigated, for "Biodiversity and Flora and Fauna" are also identified on Table 8.3 of the SEA Environmental Report, as are Residual Adverse Significant Effects. Mitigation measures are set out in the Environmental Report and these influence the draft LAP.

In relation to submission relating to existence of nature surrounding agricultural lands at Millhead and Kilreesk Lane, the submission identifies the existence of biodiversity in the area to the west of the airport. Additional information can be added to the SEA Environmental Report to acknowledge this.

Recommendation

No change to draft LAP.

Proposed Amendment to SEA ER:

To add the following footnote after the sentence “There is however potential for the LAP to impact upon sensitivities in the wider region” under Section 4.5 Biodiversity and Flora and Fauna of the SEA Environmental Report: *Biodiversity in the wider region includes that adjacent to and to the west of the LAP lands. This biodiversity may include species such as rabbits, foxes, hedgehogs, badgers, bats and various bird species, including raptors.*

Amend Section 4.9.1.1 to replace “~~At COP21 in Paris 2015, the parties reached a legally binding and universal agreement to limit global warming to 1.5°C above pre-industrial levels~~” with the following text: At COP21 in Paris 2015, the parties reached a legally binding and universal agreement to combat climate change and to accelerate and intensify the actions and investments needed for a sustainable low carbon future. The Paris Agreement central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2°C above pre-industrial levels and to pursue efforts to limit global warming to 1.5°C above pre-industrial levels.

15.0 Submissions relating to Appendix 5 – Screening for Appropriate Assessment

Appendix 5 Screening for Appropriate Assessment

FIN-C239-6, FIN-C239-13, FIN-C239-16, FIN-C239-17, FIN-C239-18, FIN-C239-19, FIN-C239-21, FIN-C239-24, FIN-C239-29, FIN-C239-31, FIN-C239-40, FIN-C239-44, FIN-C239-56, FIN-C239-59, FIN-C239-63, FIN-C239-75, FIN-C239-89, FIN-C239-91, FIN-C239-102, FIN-C239-109, FIN-C239-111, FIN-C239-114, FIN-C239-139, FIN-C239-148, FIN-C239-161, FIN-C239-164, FIN-C239-172.

Summary of Comments

- A number of submissions express concerns in relation to increased night-time noise over Baldoyle Bay (Special Area of Conservation and Special Protection Area) and the possible adverse effects on the protected bird and wildlife species.
- The location of quiet areas protected by Natura 2000 is questioned. It is noted that noise zone maps suggest that SAC's and SPA's along the Fingal and Dublin coastline will be severely encroached by noise emanating from Dublin Airport. In this regard, clarity is required as to the studies carried out to understand the impacts on bird and wildlife species in these areas.
- Reference is made to AA Screening in the Noise Action Plan process.
- Concern is expressed regarding the screening conclusion particularly in the context of recent planning applications which should be included in the assessment process.
- Consultation with NPWS or EPA is questioned.

Chief Executive's Response

Impact of night noise on Baldoyle Bay

The sounds that birds hear can be divided into (1) non-threatening sounds, to which birds may be habituated and (2) threatening sounds. Examples of non-threatening sounds include wave noise on a beach or constant regular traffic noise. Threatening sounds include impulsive sounds such as thunder or construction piling. Aircraft noise from overflying aircraft is considered to be a constant regular noise that is not threatening to birds and to which they are likely to habituate rapidly.

Phalan and Nairn (2007) report on disturbance to waterbirds in South Dublin Bay. Waterbird numbers, human activities and disturbance events were systematically recorded at Irishtown in South Dublin Bay over a three-month period in the winter of 2000/2001. This study found inter alia that low-flying aircraft (<500m [1,640 ft] altitude) caused no apparent disturbance. Birds feeding in the study area generally seemed habituated to people, dogs and vehicles that moved predictably along paths, and even to low-flying aircraft.

IECS (2009) found that observations of aircraft overflights on the Humber Estuary on approach to and departure from Humberside Airport recorded wader flight responses to fast military jets (arriving over the estuary before their noise), with the same flocks not exhibiting a flight response to slower training flights by the same type of military aircraft at the same site. It was hypothesised that the birds could see the aircraft arrive over the estuary at the same time as hearing the noise. This study also found that Waterfowl on the Humber have habituated to regular approaches of planes towards Humberside Airport, with no flight response to the planes passing over the mudflats.

The literature suggests that the noise and visual stimuli of regular aircraft overflying in excess of 1,000 ft will not significantly disturb waterbirds at their coastal sites. A public consultation by daa in 2016 presented noise modelling contours for arrivals and departures of aircraft to and from Dublin Airport and this indicated that aircraft are in excess of 1000 ft [and up to 3000+ ft] when overflying the Dublin coastline.

Phalan and Nairn (2007) found that low-flying aircraft caused no apparent disturbance to waterbirds in South Dublin Bay and River Tolka Estuary SPA. The Conservation Objectives Supporting Document for Baldoyle Bay SPA contains a Disturbance Assessment which does not list aircraft as a disturbing activity to waterbirds of that SPA. An observational study previously undertaken at Baldoyle Bay SPA and Rogerstown Estuary SPA sites has revealed that waterbirds do not react to overflying aircraft (pers. comms).

It is reasonable to conclude that on the basis of the literature reviewed, waders and waterbirds are almost certainly already habituated to overflying aircraft at altitude, and that a significant effect upon either the long term population trend, or range, timing and intensity of use of areas by overwintering bird species Special Conservation Interests of the Dublin coastline SPA sites is not likely to occur as a result of the Dublin Airport LAP.

AA Screening of Noise Action Plans

The issues raised in submissions would appear to be referring specifically to the Screening for AA of the Noise Action Plan and not the Screening for AA carried out in respect of the draft Dublin Airport LAP and is therefore outside of the scope of this report.

AA Screening and Consultation

The in-combination assessment has been informed by the threats and impacts pathways on the receiving environment and whether there is potential for in-combination effects on the QI and SCI for which downstream sites are designated.

All key EPA identified watercourses within the county were named in Section 2.2.1 Existing Environment and are shown in Figure 2 of the AA Screening.

In relation to fuel dumping, the Dublin airport LAP is a land use plan to inform development management in the area. Fuel dumping is by its nature, an emergency procedure, of infrequent nature which would be required by IAA / Air Traffic Control in response to health and safety issues.

Consultation on the draft plan has included the EPA, DCCA, DAFM, DPHLG and DAHG [which includes NPWS].

The AA process is ongoing.

Recommendation

No change

16.0 Other Submissions

Other Submissions - Land-use

FIN-C239-84, FIN-C239-92, FIN-C239-130, FIN-C239-163, FIN-C239-167, FIN-C239

Summary of Comments

- A number of submissions request the following in relation to land-use within and adjoining the Dublin Airport lands as follows:
 - additional lands in the vicinity of the Airport to be rezoned for 'GE-General Employment use to facilitate sustainable development and economic growth.
 - the LAP to examine the potential of providing ancillary services such as retail premises within the strategic location of Dublin Airport, a small supermarket facility is cited in this regard.
 - the LAP to include a text based specific objective within Section 5.2 Circular Economy and Waste Management of the draft plan as follows

'Ensure the St. Margaret's Waste Transfer and Recycling Centre serves to meet national, regional and local waste management policy guidelines without impeding the operational and development capacity of Dublin Airport'

- that the existing helicopter maintenance facility at Forrest Great, directly north of the LAP boundary to be included within the LAP boundary in the context of a key infrastructure support and service for Dublin Airport.
- Construct a Spectator Platform to ensure safety close to the new north runway.

Chief Executive's Response

The submission is seeking additional GE lands outside of the Local Area Plan to be rezoned. Amendment to zonings is more appropriately dealt with during review of the Fingal Development Plan which is due to commence in 2021.

Retail uses within the DA zone are subject to the zoning matrix in the Development Plan. As with other uses which do not relate to core aviation uses, the LAP aims to protect the core aviation function of Dublin Airport through ensuring adequate investment to overcome surface access constraints. Objectives within the LAP clearly set out the constraints at the airport. Development of significant non-core uses could have a detrimental effect on maintaining surface access and ensuring investment is effectively utilised to protect core function. It is not appropriate to insert objectives regarding retail uses to service staff and other persons who are not passengers.

The location of St. Margaret's Recycling & Transfer Centre within the Draft LAP boundary is recognised however it should be noted that this is a non-conforming use. Objective Z05 of the County Plan sets out the Council's position on Non-Conforming Uses. The Draft LAP does not propose changes to the zoning of the land as set out in the Fingal

Development Plan and does not propose any changes to use classes 'Permitted in Principle' and those 'Not Permitted'. It is not considered necessary to insert a Specific Objective for St Margaret's Waste Transfer and Recycling Centre.

The location of the existing helicopter maintenance facility at Forrest Great outside the Draft LAP boundary is noted. These lands are zoned GB and it should be noted that the existing helicopter maintenance facility is a non-conforming use. The Dublin Airport LAP relates to the 'DA zone. As a consequence the boundary is clearly identified in the Fingal Development Plan 2017-2023 and the Draft LAP. To amend the LAP boundary and any associated amendment to the GB zoning for piecemeal purposes would require a Variation to the Development Plan. No amendment is considered necessary.

The consideration of a proposal and specific location for a 'Spectator Platform' within the DA zoned lands is best considered as part of the Development Management process. The DA land use zoning does not preclude such a proposal being considered.

Recommendation

No change.

17.0 Summary of Recommended Amendments to Draft LAP

Chapter	Submission	Objective / Section	Recommendation
1 Introduction			
2 Dublin Airport in Context			
3 Forecasts and Capacity Constraints			
	152 daa	3.2.1.3	<p>Delete the following in Section 3.2.1.3 Apron as follows: The apron is the area between the runways/taxiways and terminal gates and where aircraft are parked, unloaded or loaded, refuelled, or boarded.</p> <p>Replace with the following: Section 3.2.1.3 <i>'Apron means a defined area intended to accommodate aircraft for purposes of loading or unloading passengers, mail or cargo, fuelling, parking, or maintenance.'</i></p>
4 Vision and Strategic Objectives			
5 Transition to a Low Carbon Economy			

		5.1	<p>Amend section 5.1 of draft LAP (and corresponding text of SEA ER) to replace “At COP21 in Paris 2015, the parties reached a legally binding and universal agreement to limit global warming to 1.5°C above pre-industrial levels” with the following text:</p> <p>At COP21 in Paris 2015, the parties reached a legally binding and universal <u>agreed</u>ment to <i>combat climate change and to accelerate and intensify the actions and investments needed for a sustainable low carbon future. The Paris Agreement central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2°C above pre-industrial levels and to pursue efforts to</i> limit global warming to 1.5°C above pre-industrial levels.</p>
6 Economic Impact of Dublin Airport			
	146 TII 169 OPR 170 NTA	ED02	<p>It is proposed to amend the wording of Objective ED02 as outlined below:</p> <p>In order to protect the core aviation function of Dublin Airport, no further non-air transport related office development shall be permitted at the HT zoned lands within the Airport until such time as required roads infrastructure is in place and public and sustainable transport such as the Swords CBC and Metro Link are operational. Any planning application for further phases of development at Dublin Airport Central shall be accompanied by a traffic <i>and transport</i> impact assessment <i>setting out</i> the impact of development on core airport function <i>and shall include mobility management plans which shall comply with the Surface Access and Transport objectives in Chapter 8 of this LAP.</i></p>

	170 NTA	EA12	Amend objective EA12 as outlined below- To maintain and protect accessibility of freight to and from Dublin Airport as a priority in particular with respect to accessibility from the M1, M50 and the TEN-T network for freight movements. Any planning applications for new or expansion of freight and cargo operations within the DA zoned lands shall be accompanied by a traffic <i>and transport</i> impact assessment, <i>specific proposals for the application of mobility management measures and the demonstration of consistency with the overall Dublin Airport Mobility Management Plan.</i>
7 Airport Infrastructure			
	126 Eirgrid	UT1	Amend Objective UT1 as follows: 'Support and facilitate the development and upgrade of strategic information telecommunications technology, <i>electricity network</i> and other required utilities infrastructure.'
	152 daa	OS1	Amend Objective OS1 as follows: 'Control the type and height of any structures that may be developed in the environs of the Airport (in consultation with the Irish Aviation Authority and <i>Dublin Airport</i> in accordance with the Obstacle Limitation Requirements of Regulation (EU) No 139/2014 (EASA Certification Specifications), previously required under ICAO Annex 14 and which are depicted on the aerodrome operator's safeguarding map.'
	173	7.2.1	Insert Figure 78 from DTTAS Review (2018) into Section 7.2.1 of the draft LAP. to be identified as Fig. 7.1 'Potential Locations for a future Third Terminal' as per the DTTAS 'Review of Future Capacity Needs at Ireland's State Airports' August 2018 within Section 7.2.1

			Terminals of the draft LAP.
8 Surface Access and Transport			
	146 TII 169 OPR 170 NTA	SF02	It is proposed to amend the wording of Objective SF02 as outlined below: Require, as part of any application that will result in increased demand for travel, the submission of a detailed transport model (based on the NTA ERM), to be undertaken in collaboration with stakeholders such as FCC, the National Transport Authority and Transport Infrastructure Ireland; <i>a traffic and transport impact assessment; and specific proposals for the application of mobility management measures and the demonstration of consistency with the overall Dublin Airport Mobility Management Plan</i> in order to prioritise <i>public transport</i> , appropriately phase transport infrastructure requirements and the appropriate provision of car-parking as set out in the South Fingal Transport Study, relevant to the growth of Dublin Airport.
	170 NTA	MM1	Amend Objective MM1 as follows- Facilitate, with the relevant stakeholders, the coordination and/or amalgamation of all Mobility Management Plans within the Dublin Airport <i>LAP area campus</i> , to provide an over-arching MMP for submission to Fingal County Council for approval every three years. This will include the designation of a mobility manager for the Airport by daa who should co-ordinate, engage and review the MMP. The first co-ordinated MMP should be delivered within 2 years of this LAP.

	146 TII 170 NTA	MM4	Objective MM4: Require that all organisations operating within the Dublin Airport LAP area ^{campus} implement the overarching Mobility Management Plan, either as part of regular stakeholder liaison or incorporation within the development management process, <i>through submission of MMPs with planning applications.</i>
	170 NTA	CY1	Amend Objective CY1 and CY2 as follows- Objective CY1: Provide for cycle paths separated from traffic along the R132 between Pinnock Hill Roundabout and the boundary with Dublin City Council as part of the Swords Core Bus Corridor. <i>Cycle paths shall comply with the National Cycle Manual and shall be designed in accordance with best practice.</i>
	170 NTA	CY2	Objective CY2: All development proposals within the LAP shall be required to demonstrate provision of high quality cycle facilities for employees, to include secure bike parking facilities, and changing and shower facilities to incentivise sustainable transport. <i>Cycle facilities shall comply with the National Cycle Manual and shall be designed in accordance with best practice</i>
	152 daa	8.2.3	'Provide appropriate levels of bus priority to serve existing and proposed long-term car parking facilities to the south and west of the Airport campus to be considered in the context of the need to cater for higher frequency bus services on the proposed R132 Swords Road Core Bus Corridor, and this will require careful consideration in any future scheme proposals.'

	152 daa	EA6	Amend Objective EA 6 as follows: 'Facilitate the delivery of the R132 Swords Road Core Bus Corridor and to seek its prioritisation as a scheme of strategic national importance in enabling sustainable growth of Dublin Airport in the short-term and in advance of MetroLink. '
	152 daa	PT 4	Amend Objective PT4 as follows: 'Facilitate the delivery of the R132 Swords Road Core Bus Corridor and to seek its prioritisation as a scheme of strategic national importance in enabling sustainable growth of Dublin Airport in the short-term and in advance of MetroLink. '
	152 daa	8.4.6	Amend 8.4.6 as follows: The use of the Dublin Airport taxi rank is controlled by means of a permit system operated by daa. This inherently <i>appears to</i> reduce the number of taxis by placing an additional restriction on use, thereby <i>possibly</i> reducing the number of taxis by placing an additional restriction on use.
	152 daa	8.6.1	Amend Section 8.6.1 Short Term Air Passenger Car Parks as follows: Delete In total there are around 3,400 short-term spaces available to passengers.
	152 daa	8.6.1	Amend text as follows: The provision of park and ride outside the DA zoning could be considered as part of an overall parking strategy <i>noting that this would need more detailed consideration in terms of how such a measure would be managed within any overall Dublin Airport Mobility Management Plan.</i>

	152 daa	8.6.1	Amend text as follows: The provision of park and ride outside the DA zoning could be considered as part of an overall parking strategy <i><u>noting that this would need more detailed consideration in terms of how such a measure would be managed within any overall Dublin Airport Mobility Management Plan.</u></i>
9 Environment and Community			4- DCHG

	85- IW	9.4.1	<p>Insert the following new text into Section 9.4.1 'Foul Drainage' of the draft LAP: <u>"Multiple projects are currently being progressed by Irish Water to deliver the infrastructure and capacity necessary for predicted population growth within the Dublin Region. Any increased water demand or foul discharge from the plan lands will be contingent on the constraints of the Irish Water Capital Investment Programme and the approval of Irish Water as part of the statutory approval process within any planning application. The growth of Dublin Airport will be subject to the progress of the various improvement works and subject to the agreement of Irish Water. Planning consent will be dependent on capacity within waste water treatment infrastructure.</u></p> <p><u>In particular, the following key projects are applicable to Dublin Airport.</u></p> <ol style="list-style-type: none"> <u>1. Ringsend Wastewater Treatment Plant upgrade - The Ringsend Wastewater Treatment Plant is currently overloaded. An application for the upgrade was lodged with An Bord Pleanala in June 2018 and granted permission in April 2019. Upgrade works are scheduled to increase the treatment capacity from 1.64 million p.e. to 2.4 million p.e. This upgrade is currently programmed to be complete in 2025.</u> <p><u>Greater Dublin Drainage Project - Planning application lodged with An Bord Pleanala in 2018, oral hearing held in March 2019 and consent granted in November 2019.'</u></p>
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	83 151 IFI 159	9.5	<p>Amend Text within Section 9.5 as follows;</p> <p>2. 'Future development should comply with the Dublin Airport Local Area Plan and Surface Water Management Plan objectives to ensure any impacts on water quality will be positive. <u>All discharges to surface water and to ground water must support compliance with the European Communities European Objectives (Surface Waters) Regulations 2009 and with the European Communities (Groundwater) Regulations 2010 respectively, both of which give effect to the Water Framework Directive. Improvement of surface water quality is expected through implementation of SuDS Objectives.</u>'</p>
	83 151 IFI 159	SWQ01	<p>Amend Objective SWQ01 as follows;</p> <p>Applications for development shall demonstrate that they <u>comply with the Water Framework Directive</u> will not deteriorate the status of either surface or ground water bodies. Where appropriate, permissions shall be conditioned to require the developer to undertake actions in order to improve the status of water bodies, in line with the Water Framework Directive.</p>
	152 daa	9.8.2	<p>Delete Section 9.8.2 Architectural Heritage as follows: Three of the structures (1937 Terminal Building, Castlemoate House, and the Church of Our Lady Queen of Heaven) are in the ownership of daa and are located within the current airport campus.</p> <p>Replace with the following:</p> <p><u>Two of the structures (1937 Terminal Building and Castlemoate House) are in the ownership of daa while the Church of Our Lady</u></p>

			<u>Queen of Heaven is in the ownership of the St. Laurence O'Toole Trust. These structures are located within the Airport campus.'</u>
152 daa	SW03		Amend Objective SW03 as follows: Introduce SUDS measures to existing paved/developed areas that do not currently have any SUDS features. <u>That Dublin Airport examine the feasibility of incorporating SUDS features into existing areas for the flooding and water quality benefits of same.'</u>
152 daa	SW08		i)Amend Objective SW08 as follows: 'Develop a robust surface water management system in compliance with the recommendations of the Dublin Airport Local Area Plan Strategic Flood Risk Assessment and Surface Water Management Plan associated with this LAP, to meet future development needs and providing resilience to the effects of climate change. This will entail a full review of the current surface water system at Dublin Airport including a review of drain down times, attenuation volumes, discharge rates, and opportunities for the retrofit of SUDS. <u>The implementation of these plans and policy documents shall have regard to the outcomes of drainage studies undertaken for Dublin Airport, and any site specific, or industry specific information and requirements that may occur including consideration of upstream or downstream impacts.'</u> ii) Amend Strategic Flood Risk Assessment and Surface Water

			Management Plan (Appendix 6) in this regard
	152 daa	SW05	Amend objective SW05 as follows: i) 'Alleviate local flooding issues within the study area by providing positive drainage to affected areas. <i><u>Proposals should take into account objective FRM04 and that an Flood Risk Assessment is also conducted to ensure no increase in risk to third parties.</u></i> ii) Amend Strategic Flood Risk Assessment and Surface Water Management Plan (Appendix 6) in this regard.
	152 daa	SW05	Amend objective SW05 as follows: i) 'Alleviate local flooding issues within the study area by providing positive drainage to affected areas. <i><u>Proposals should take into account objective FRM04 and that an Flood Risk Assessment is also conducted to ensure no increase in risk to third parties.</u></i> ii) Amend Strategic Flood Risk Assessment and Surface Water Management Plan (Appendix 6) in this regard.
10 Next Steps			
Appendices			
1			

2			
3			
4 Strategic Environmental Assessment			120, 149, 15
	120, 149, 156	4.9.1.1	Amend Section 4.9.1.1 to replace “ At COP21 in Paris 2015, the parties reached a legally binding and universal agreement to limit global warming to 1.5°C above pre-industrial levels ” with the following text: <u>At COP21 in Paris 2015, the parties reached a legally binding and universal agreement to combat climate change and to accelerate and intensify the actions and investments needed for a sustainable low carbon future. The Paris Agreement central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2°C above pre-industrial levels and to pursue efforts to limit global warming to 1.5°C above pre-industrial levels.</u>
	128, 137	EPA, HSE	- Section 4.9.3 replace text relating to EPA’s (2018) Air Quality in Ireland 2017 Report with the following text which relates to the EPA’s (2019) Air Quality in Ireland 2018 Report

			<p><i>The EPA's (2019) Air Quality in Ireland 2018 identifies that:</i></p> <ul style="list-style-type: none"> ○ <i>Levels at monitoring sites in Ireland were below the EU legislative limit values in 2018;</i> ○ <i>Ireland was above World Health Organization (WHO) air quality guideline value levels at a number of monitoring sites for fine particulate matter, ozone and nitrogen dioxide;</i> ○ <i>Ireland was above the European Environment Agency reference level for Polycyclic Aromatic Hydrocarbon (PAH), a toxic chemical, at three monitoring sites.</i> <p><i>Problem pollutants identified by the EPA include particulate matter from burning of solid fuel and nitrogen dioxide from transport emissions in urban areas. Indications that Ireland will exceed EU limit values for nitrogen dioxide in the near future.</i></p> <p><i>With regards to solutions, the report identifies that:</i></p> <ul style="list-style-type: none"> ○ <i>To tackle the problem of particulate matter, clean ways of heating homes and improve energy efficiency of homes can be progressed; and</i> ○ <i>To reduce the impact of nitrogen dioxide, transport options in the Government's Climate Action Plan can be implemented and transport choices can be considered by individuals.</i> <p>- Table 5.1 Strategic Environmental Objectives (SEOs), Indicators and Targets: include the following footnote after</p>
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			<p>Environmental Component <i>Population and Human Health</i> <u><i>Population and Human Health has the potential to interact with various environmental components – including “Soil”, “Water”, “Air and Climatic Factors”, “Material Assets” and “Landscape”. Various indicators and targets are provided for these components on this table.</i></u></p> <p>In selected targets for Air and Climatic factors AC1, replace the following text 10% increase in the number of people using sustainable transport modes (rail, bus, cycling walking) against current 2011 Travel to Work Modes. (target also linked to No. 3 PHH2 above) with <u><i>To increase the proportion of journeys to and from the airport that are taken on public transport or walked or cycled over the Plan period</i></u></p> <p>Table 5.1, to replace the following indicator and target under SEO No. 7: <i>Percentage of new residential buildings granted planning with A3 or higher BER; All new buildings to have an A3 or higher BER</i> With the following text: <u>The 2nd Fingal Development Plan SEA Monitoring Indicator and Target under this SEO are not directly relevant to the Airport LAP area; no additional measures are required.</u></p> <p>- Table 8.3 Overall findings, amend table heading as follows: <u><i>Likely</i></u> Residual Adverse Significant Effects Insert the following text in relation to Air and Climatic Factors under sub-heading <u><i>Likely Residual Adverse Significant Effects. New Footnote: As detailed under Section 8.2, greenhouse gas emissions associated with flights</i></u></p>
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			<p><i>operating in the EEA are covered by the EU ETS and airlines are required to monitor, report and verify their emissions, and to surrender allowances against those emissions. The scope of aviation in the EU ETS is limited to flights within the EEA. CORSIA will come into effect in 2021 and aims to stabilise global aviation emissions at 2020 levels by requiring airlines to offset any emissions growth after 2020 by purchasing eligible emission units generated by projects that reduce emissions in other sectors. As Ireland is a member of ICAO, Irish aircraft operators will have to offset any emissions growth after 2020 by purchasing eligible emission units, i.e. pay full carbon price. Greenhouse gas emissions from surface access will be limited by the wide policy framework relating to climate mitigation and adaptation, alternative energy use and energy/fuel efficiency, including provisions relating to the Metro, Swords Road Core Bus Corridor and increasing usage of electric cars.</i></p> <p><i>The onsite and offsite data collected since implementation of the local air quality monitoring programme at Dublin Airport has been generally found to be well within the limit values mandated in the Air Quality Standards Regulations. There are a number of local, existing air quality issues that would be made worse in the absence of progressing more sustainable surface access (which is provided for the Plan) and Air Quality Objectives AQ1 to AQ5. Air quality issues are likely to improve in the medium to longer term.</i></p> <p>An increase in the frequency of noise emissions. This has been mitigated for new development by management techniques including by the application of Noise Zones. <i>The</i></p>
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			<p><i>extent of areas affected by varying noise ranges is shown on Figure 4.13. Areas where noise levels are highest are indicated by Noise Zone A. Various provisions have been integrated into the Plan and wider framework to ensure that noise levels at sensitive receptors will be minimised.</i></p> <p>Risks remain due to uncertainty with regard to climate and interactions with issues including flooding and material assets. <i>However, flood risk has been mitigated in compliance with relevant legislative requirements and areas identified as being at elevated levels of flood risk have been provided for appropriately.</i></p> <ul style="list-style-type: none"> - Table 10.1, insert additional sources as follows: <i>The EPA-managed network of air quality monitoring stations (including in Fingal and Swords); Annual progress report relating to European Communities (Environmental Noise) Regulations 2018;</i> and insert relevant monitoring frequencies. <p>In selected targets for Air and Climatic factors, replace the following text 100% increase in the number of people using sustainable transport modes (rail, bus, cycling walking) against current 2011 Travel to Work Modes. (target also linked to No. 3 PHH2 above) with <i>To increase the proportion of journeys to and from the airport that are taken on public transport or walked or cycled over the Plan period</i></p> <p>Replace the following text Percentage of new residential buildings granted planning with A3 or higher BER All new buildings to have an A3 or higher BER with <i>The 2nd Fingal Development Plan SEA</i></p>
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			<p><u>Monitoring Indicator and Target under this SEO are not directly relevant to the Airport LAP area; no additional measures are required</u></p> <p>To make reference to the <i>The emerging Clean Air Strategy (currently being prepared)</i> in Appendix II to the SEA Environmental Report "Relationship with Legislation and Other Plans and Programmes".</p>
5			
6 Strategic Flood Risk Assessment and Surface Water Management Plan			
	152 daa	6.2	<p>Amend paragraph 3 in Section 6.2 of the Strategic Flood Risk Assessment and Surface Water Management Plan (Appendix 6) as follows: 'Whereas, it is not part of the current brief, the daa should review the performance of all stormwater infrastructure, both within the subject study area and also the receiving watercourses downstream. JBA understands that there are ongoing surface water management studies a Drainage Masterplan is currently being written conducted by a third party consultant for the daa. The ongoing studies will include important information on the surface water management system and flood risk for daa lands. This information is currently not available and is unlikely to be available prior to the adoption of the Dublin Airport LAP. Any subsequent updated relevant information regarding drainage or flooding that becomes available post adoption of the LAP will be considered at that time. As there are known flooding issues areas of predicted flooding downstream of Dublin Airport (as referenced by the CFRAM flood mapping), there is an opportunity to</p>

			potentially reduce both the rate and volume of stormwater from the Airport lands which would be advantageous for all concerned.
	152 daa	6.4	Amend Section 6.4 Surface Water Management Strategy within Appendix 6 as follows: 'Fingal Co Council / daa should also look to retro-fit SuDS <i>where feasible</i> , to'
	152 daa	Page 28 of SFRA & SWMP	Insert the following at the end of the third and sixth bullet point at page 28 of the Strategic Flood Risk Assessment and Surface Water Management Plan (Appendix 6) as follows: <i>'Evidence provided by FCC after consultation with local residents'</i> <i>'Any adjustment to the pipe sizing would need to be accompanied by a suitably detailed FRA'</i>

18.0 Overall Recommendation

It is recommended that the Council make the Local Area Plan, as amended, by passing the following resolution

That Fingal County Council having prepared and published the draft Dublin Airport Local Area Plan and having taken into consideration the representations received, and having considered the report of the Chief Executive, hereby resolves pursuant to Section 20(3)(d) of the Planning and Development Act 2000 (as amended), to adopt the Dublin Airport Local Area Plan'.