



An tÚdarás Inniúil um  
Thorann Aerárthaí

Aircraft Noise  
Competent Authority

## Malahide Community Forum (MCF)

The collective voice of Malahide Residents' Associations

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Customer Care Unit

17 FEB 2022

Fingal County Council  
17-02-2022

Re; Planning Application F20A/0668 and

### Draft Determination by the Airport Noise Competent Authority

Malahide Community Forum makes the following observation in relation to these matters.

#### 1. County Development Plans

The County Development Plan adopted by Dublin Co. Co. in the early 1970's made provision for the development of the north parallel runway at Dublin Airport.

Following that decision the many housing developments planned in the North Portmarnock area at that time, i.e. directly under the projected flight path, were required to provide additional sound insulation measures as a condition of the development. In contrast no such provision was required for the significant volume of housing planned for development in East Malahide at the same time.

All succeeding County Development Plans incorporated provision for the second parallel runway, but all provided that the noise and safety zones were determined assuming straight out departures from both runways.

The current Fingal County Development Plan made similar provision but was subsequently amended to facilitate divergent flight paths on departure, a concept daa and their consultants Bickerdike Allen Partners initially put forward in the mid 2010's.

Divergent flight path are a requirement if the parallel runways are to be operated as "Independent Parallel Runways", which is possible at Dublin Airport as the separation between the parallel runways is sufficient to allow this mode of operation. But Independent Parallel Runway operation is not a requirement under international regulations, but can be employed by the airport operator to achieve an increase in the number of aircraft movements per hour that can be handled, by approximately 15%.

#### 2. Planning Application F04A/1755, ABP Reference Number PL 06F.217429

In the decision by ABP in relation to the application by Aer Rianta for planning approval to develop the north parallel runway Condition 1 stated that

*"The development shall be carried out in accordance with the plans and particulars and the Environmental Impact Statement lodged with the application as amended by the further plans and particulars received by the planning authority on the 9<sup>th</sup> day of August 2005, including the Environmental Impact Statement Addendum, and the 3<sup>rd</sup> of March 2006 and received by An Bord Pleanála on the 30<sup>th</sup> day of August 2006, the 5<sup>th</sup> day of March, 2007 and in the oral hearing, except as may otherwise be required in order to comply with the following conditions."*

**Executive Committee Members:** Gerry Duggan (Chairperson), Hazel Bolton (Vice-Chairperson), John Shirey (Hon. Treasurer), Peter Hynes (Hon. Secretary)

In none of the voluminous documentation lodged with the planning authorities was there any proposal for divergent flight paths, on departure. Thus no planning approval was granted for such a mode of operation.

### **3. Planning Application F20A/0688.**

This application by daa explicitly states that the only changes sought to planning decision F04A/1755: ABP Ref No PL 06F.217429 is to amend conditions no. 3(d) and condition no.5, in relation to night flight restrictions.

But the documentation submitted to ANCA by daa and its consultants clearly indicates an intention to operate with divergent flight paths, on departure, thus exposing residents of housing in East Malahide to increased aircraft noise, which these houses were never designed to attenuate. See attachment prepared for daa by their noise consultant AECOM.

As no planning application has been made for approval of this mode of operation, and its consequent adverse impact on Malahide residents, any decision by ANCA implying approval for a mode of operation, for which no planning approval was sought or obtained, would clearly be in breach of the planning laws.

Malahide Community Forum therefore requests that in its final determination the ANCA make it explicitly clear that any decision it makes is on the basis of Condition 1 of the ABP approval. That is for straight out departures, as provided for in the planning applications by the applicant and the decision by An Bord Pleanála.



Gerry Duggan

Chair: Malahide Community Forum



