

File With \_\_\_\_\_

## SECTION 131 FORM

Appeal NO: ABP 314485-22Defer Re O/H ☐Having considered the contents of the submission dated/ (received) 29/03/2024  
fromDolores Beggar I recommend that section 131 of the Planning and Development Act, 2000  
be/ not be invoked at this stage for the following reason(s): no new material issuesE.O.: Pat BDate: 07/04/2024

For further consideration by SEO/SAO

Section 131 not to be invoked at this stage. ☐Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.: \_\_\_\_\_

Date: \_\_\_\_\_

S.A.O.: \_\_\_\_\_

Date: \_\_\_\_\_

M \_\_\_\_\_

Please prepare BP \_\_\_\_\_ - Section 131 notice enclosing a copy of the attached  
submission

to: \_\_\_\_\_ Task No: \_\_\_\_\_

Allow 2/3/4 weeks – BP \_\_\_\_\_

EO: \_\_\_\_\_

Date: \_\_\_\_\_

AA: \_\_\_\_\_

Date: \_\_\_\_\_

File With \_\_\_\_\_

## CORRESPONDENCE FORM

Appeal No: ABP 314485 -22

M \_\_\_\_\_

Please treat correspondence received on 29/03/2024 as follows:

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

Amendments/Comments Dolores Beggan response to S. 13112/03/24: 02/04/24 ✓

## 4. Attach to file

- |   |   |
|---|---|
| (a) R/S <input type="checkbox"/>            | (d) Screening <input type="checkbox"/>    |
| (b) GIS Processing <input type="checkbox"/> | (e) Inspectorate <input type="checkbox"/> |
| (c) Processing <input type="checkbox"/>     |   |

RETURN TO EO ☐EO: Pat BDate: 07/04/2024Plans Date Stamped ☐Date Stamped Filled in ☐AA: Anthony McNallyDate: 25/04/2024

## Fergal Ryan

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**From:** Bord  
**Sent:** 02 April 2024 09:46  
**To:** Appeals2  
**Subject:** FW: North Runway  
**Attachments:** PL06F.314485 Dolores Beggan Further Observation 2024-04.pdf

**From:** Dolores Beggan <doloresbeggan@hotmail.com>  
**Sent:** Friday, March 29, 2024 8:46 PM  
**To:** Bord <bord@pleanala.ie>  
**Subject:** North Runway

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Sent from my iPhone



Dolores Beggan  
Fieldstown  
Kilsallaghan  
Co. Dublin

29/03/2024

An Bord Pleanála via online submission

Bord Pleanála Case Number: ABP-314485-22

Planning Authority Case Reference: F20A/0668

***Observations relating to Bord Pleanála Case reference ABP-314485-22 subsequent to the receipt of additional information from daa.***

To Whom it may concern,

I have reviewed the new information supplied by daa. It underscores further that daa continues to fundamentally ignore the planning permission granted in 2007 and cements the company's intention to do as they please and their expectation that they may do so with impunity.

Condition 1 of the original planning permission for the North runway 28R stated that the DAA must stay within the EIS which is shown on the below charts marked with a black outline.

The updated EIS which the DAA has submitted, clearly shows a completely new noise impact, and this addition is factual proof that the DAA are operating the new North runway against the original planning permission.

Since the planning permission was granted in 2007, there has been no consultation with any population in Co. Meath or north of the airport regarding the currently flown flight paths. People have invested heavily in their properties, myself included, and were not aware that there would be aircraft flying so low over our neighbourhoods. Our quality of life is dramatically reduced, being woken up by low flying aircraft. The noise still wakes our family up with the departure of the first departing aircraft off the North runway. Expanding this to night times, or allowing earlier departing times would be unbearable to live, and sleep would be impossible when aircraft are operating.

The original proposed departure flight paths out straight from the North runway 28R has had a ban on development for nearly 20 years, and this reflects with the area being made up of farmland, and now solar farms. The few houses in this area were consulted, and had their houses insulated, and yet have no aircraft flying in that direction. 100% of departing aircraft deviate immediately from the only planning permission condition 1 from 2007.

The DAA has added these illegal flight paths as part of a nighttime and flight number application, and if approved would give effective planning permission retention to illegal flight paths.

If the Bord were to allow a relaxation of the planning conditions 3(d) and 5 as the applicant wants with this relevant action it will give tacit support to the daa's strategy and undermine the system of planning permission.

The IAA (Irish Aviation Authority) has stated that they have only been given one set of flight procedures to approve. There are many options, but they need to be issued with designed procedures to approve.

Air NAV Ireland have stated that there are many ways that flight paths can be separated, but it is up to the DAA to instruct them to change the flight paths. This has not been done.

The DAA are claiming that the flight paths are required for safety reasons. This is not true. The flight paths can be changed to a near straight out, overflying solar farms and farms, allowing the aircraft gain height before overflying built up areas.

If the height of an aircraft doubles, the noise reduces by a factor of 4.

***“To be clear; there is no safety, regulatory or technical reason that prevents daa from complying with the original noise footprint from the 2005 EIS. DAA’s spin that the current flight paths are required for reasons of safety is simply not true.”***

If the North runway was used for landings, and the south runway used for Take offs, then the flight paths would be within the approved EIS from 2007. This is what happens when the aircraft operate to the east.

The approach path to the north runway could be offset by 10 degrees, avoiding the built up areas on the straight approach to the north runway.

This style of approach is used in some of the largest airports in the world for example New York JFK, Nice in France, and Nantes in France. The main aim is to reduce noise to the local population.

Also to note is that aircraft on approach have a very low speed, with power less than 50%, compared to departing aircraft with have power 85-100%, the noise difference between departures and arrivals is huge.

Most noise sensitive airports around the world have many noise mitigation measures. Dublin airport for runway 28R North runway has actually zero noise mitigation measures.

Examples are as follows:

No turns off published departures be low 5000ft.

No speed increase above 250 Kts below 10,000ft. (This is standard practice ICAO)

NADP (Noise Abatement Departure Procedure) 1. This is a constant climb to 3000ft before increasing speed.

Currently ATC in Dublin demand high speed, and turn aircraft off the departure routes at low altitude, which increases noise levels dramatically. The aircraft cannot climb.

If the DAA had decided to try to overfly the most populated areas north of the Runways, it could not have done a better job.

Please see the individual charts below for a comparison of the planning permission the Bord granted to the submissions from daa showing their flagrant disregard for planning law.

Also examples of how the runway operation could be changed to bring it in line with original planning permission, and have the noise over solar farms rather than built up populations. These proposals will still give the airport its maximum capacity as is planned to operate for the next few years.

In summary, granting this application, will effectively be granting permission for retention of illegal flight paths.

We have lived in our property since 1990, and since the planning application was granted in 2007, the flight paths were to be nowhere even remotely close to our property. The aircraft have always flown over our house, but 7000-10000ft above after flying out west before turning eastbound.

We invested hundreds of thousands of euro into our property, sure that the existing levels of noise would not increase. Now we have low flying aircraft overhead, when we can read the registration plates under the wings, and the noise is deafening.

Dublin airport is being operated in a very irresponsible manner, with zero noise mitigation procedures, and a blatant disregard for the planning process and its neighbouring communities.

Regards,

Dolores Beggan

ADSB transponder data captured from aircraft departing DUB over a 24 hour period was used to show the paths actually flown. Note about 50% fly directly over 12,000 people in Ratoath and 100% fly within 2km of Ashbourne while at climb power, the noisiest most disruptive phase of flight.

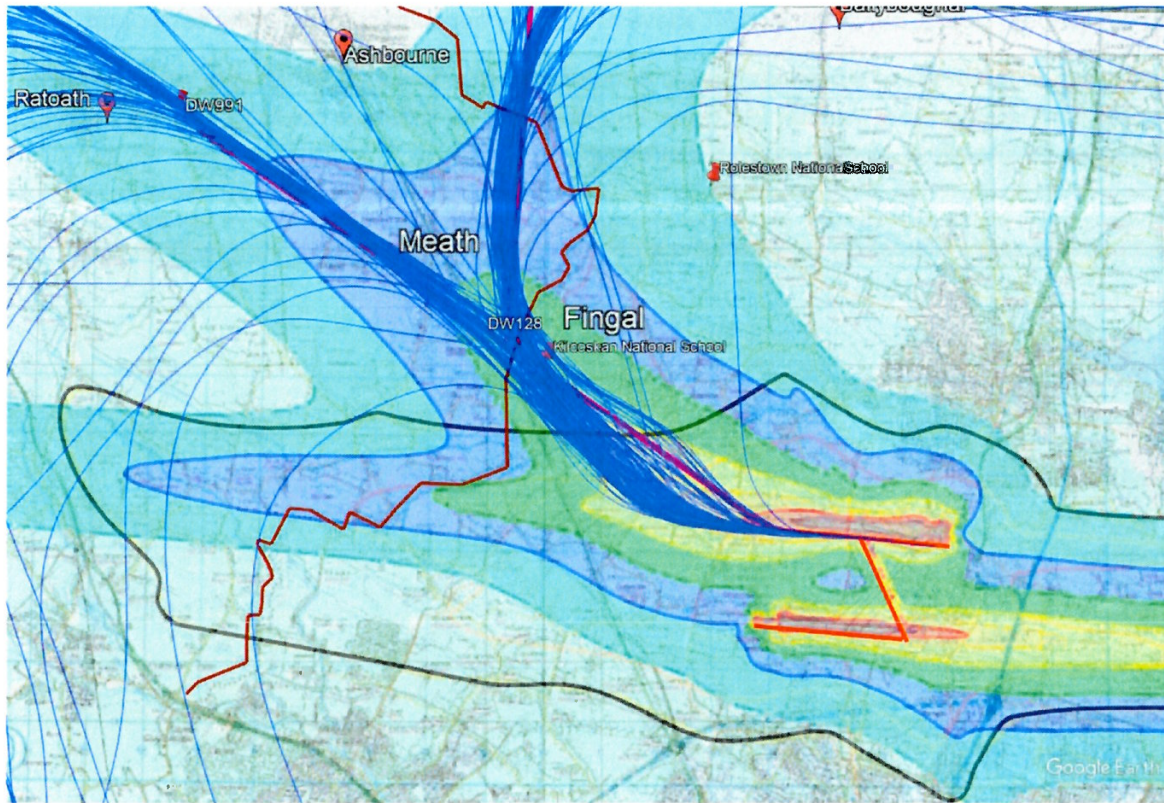


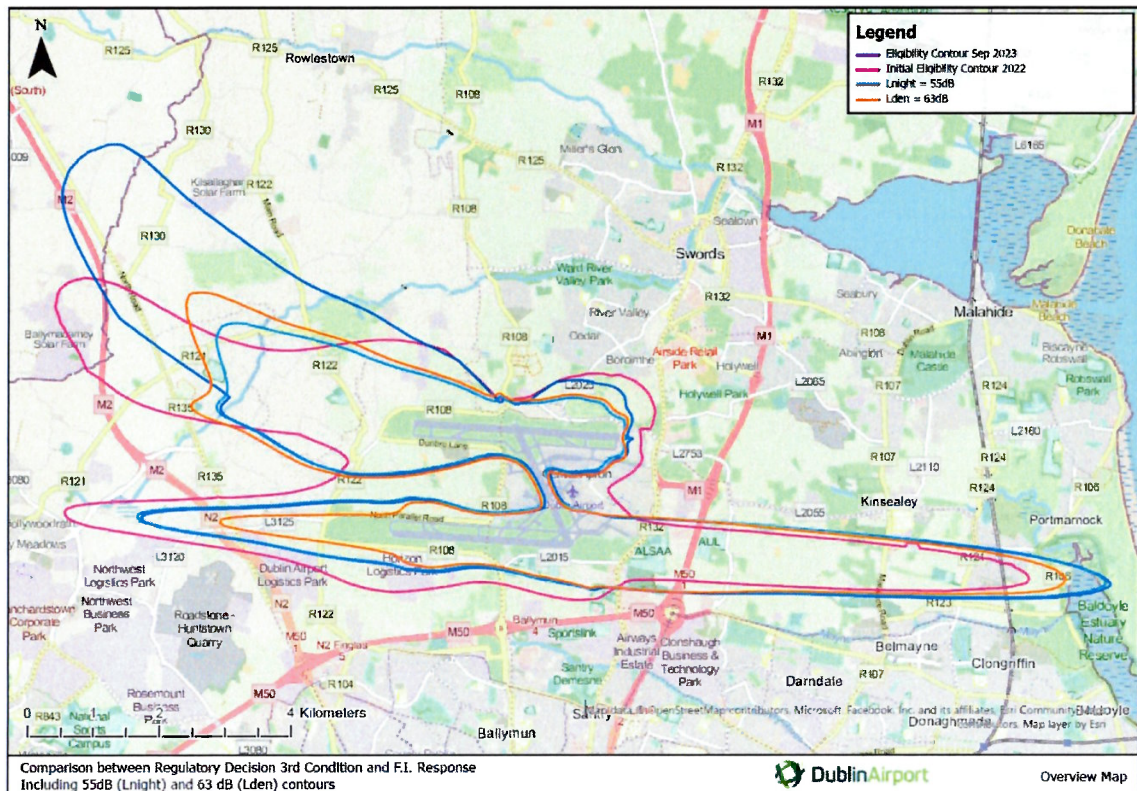
Figure 1 The present EIAR claims the coloured area as the "permitted" scenario.

In Figure 1, daa's Forecast Lday Noise Contours 2035 Permitted Scenario Figure 13C-23 are overlaid with the current traffic. The magenta tracks currently in use form the 4<sup>th</sup> flight-path design so far by daa/AirNav and only went into operation in February of 2023.

Examination of the original EIS (*shown with a black outline*) demonstrates that the Noise Contours in Figure 1 are nowhere near the noise contours claimed as permitted in the current EIAR. Simple logic dictates that it is impossible that these noise contours are the "Permitted Scenario".

This in effect is a new application for new flight paths with new noise impacts.





*Figure 2 New submission from daa further clarifying breach of Condition 1 of the granted permission*

Figure 2 supplied by daa shows that the RWY28R SID is in clear breach of Condition 1 of the granted permission.

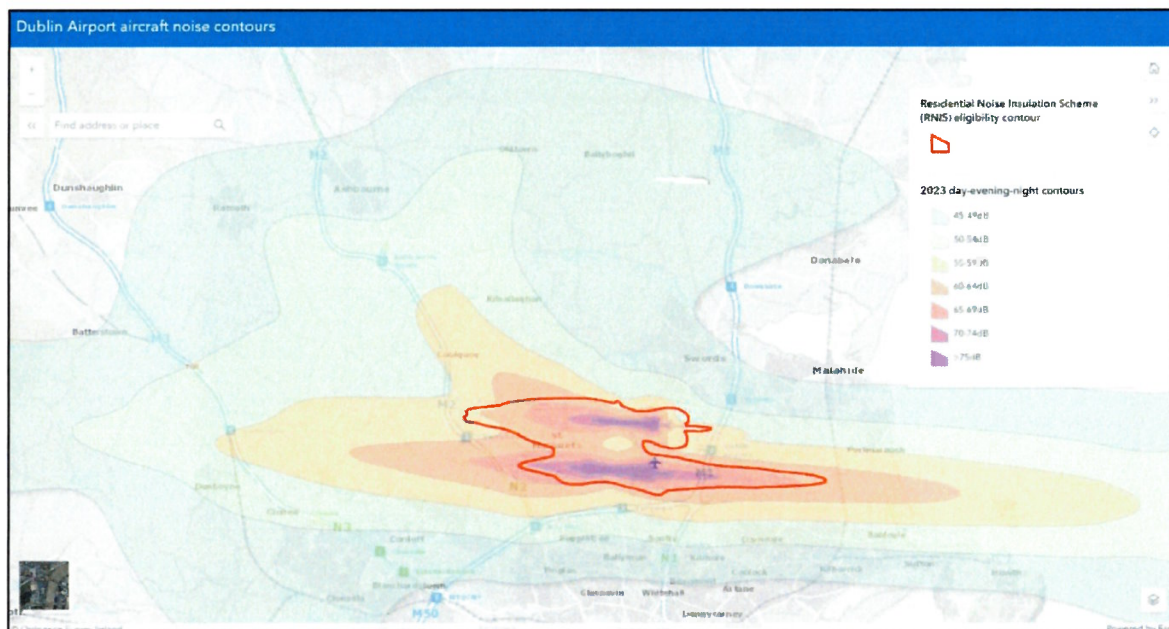
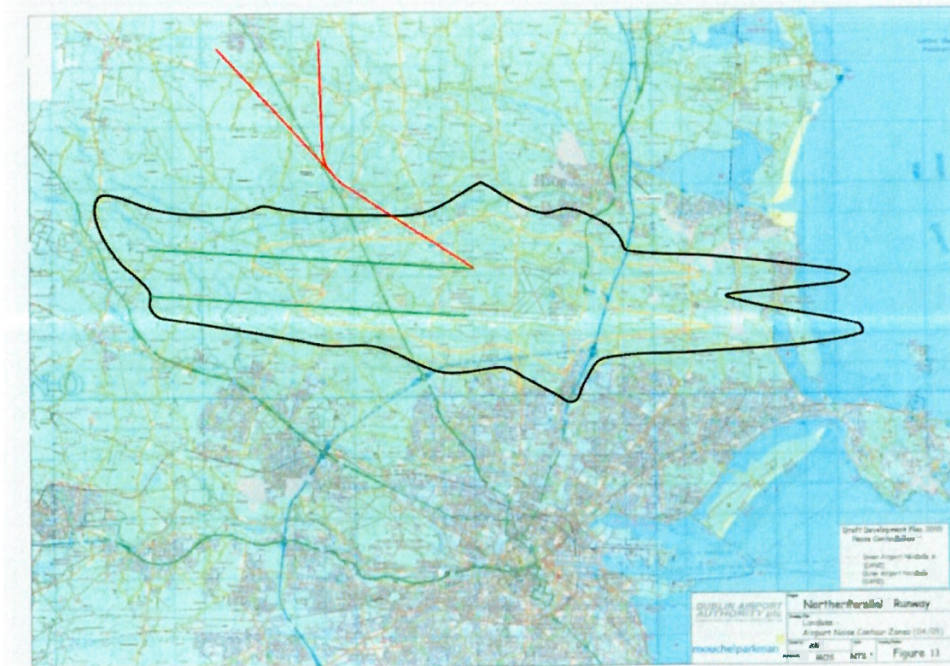


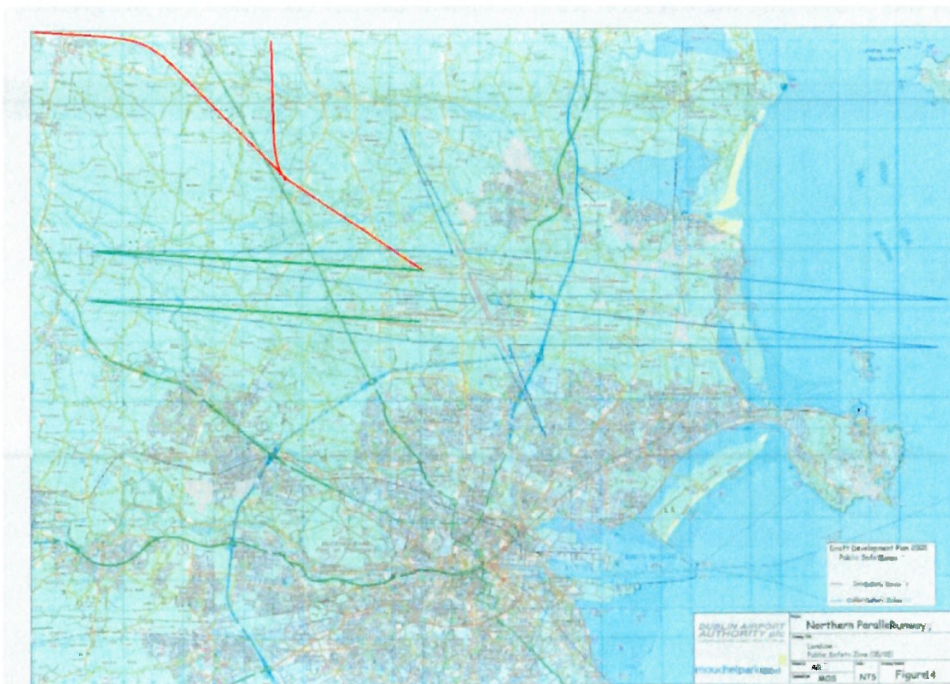
Figure 3 Latest ANCA data demonstrating noise all the way up to Ashbourne and Ratoath

Once again, daa's new submission demonstrates their casual disregard for condition 1 of the only planning permission in force for the north runway.

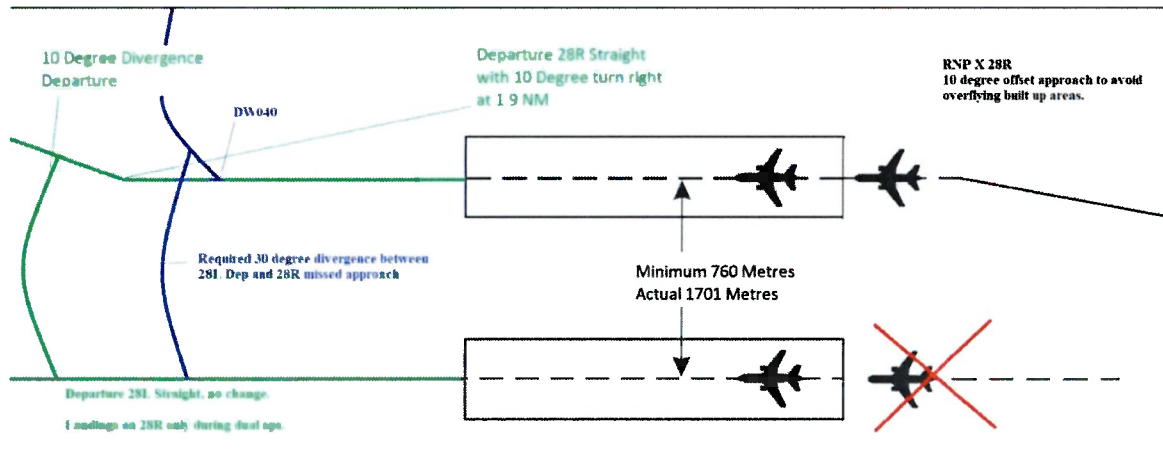




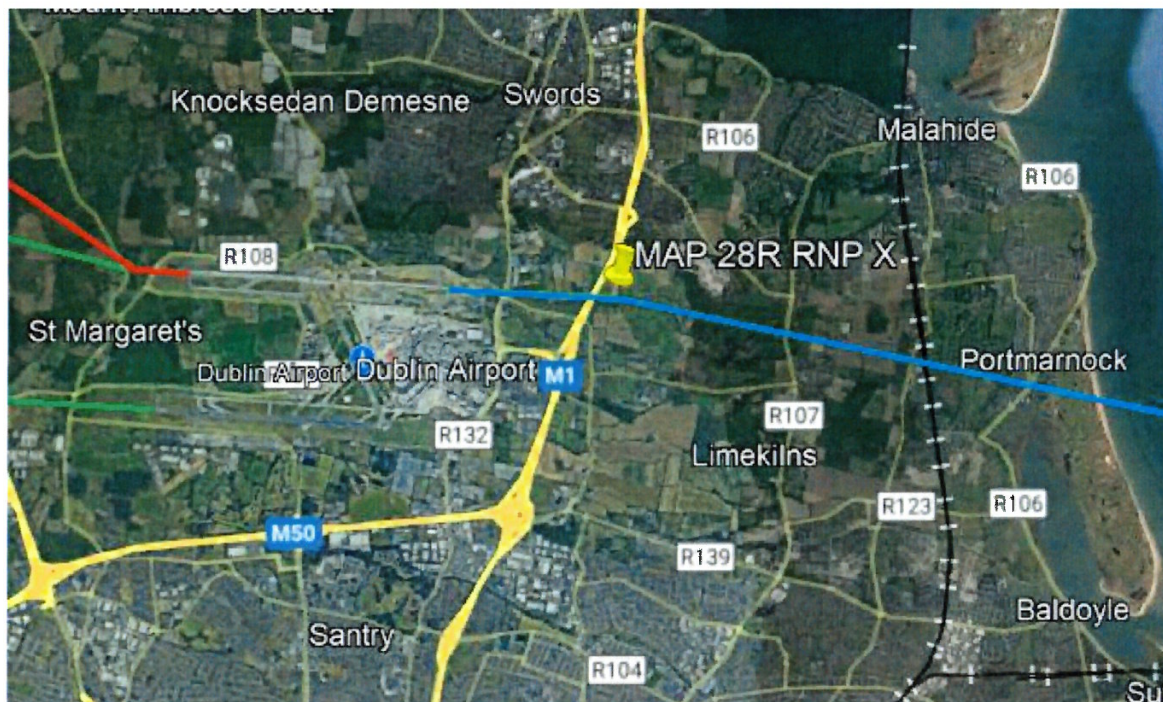
This Chart shows the outline of the 2007 planning permission, with green lines indicating the intended flight paths, and the red the actual flown illegal flight paths.



This chart shows the Public safety zones as part of the 2007 planning permission. In red the actual illegal flight paths.

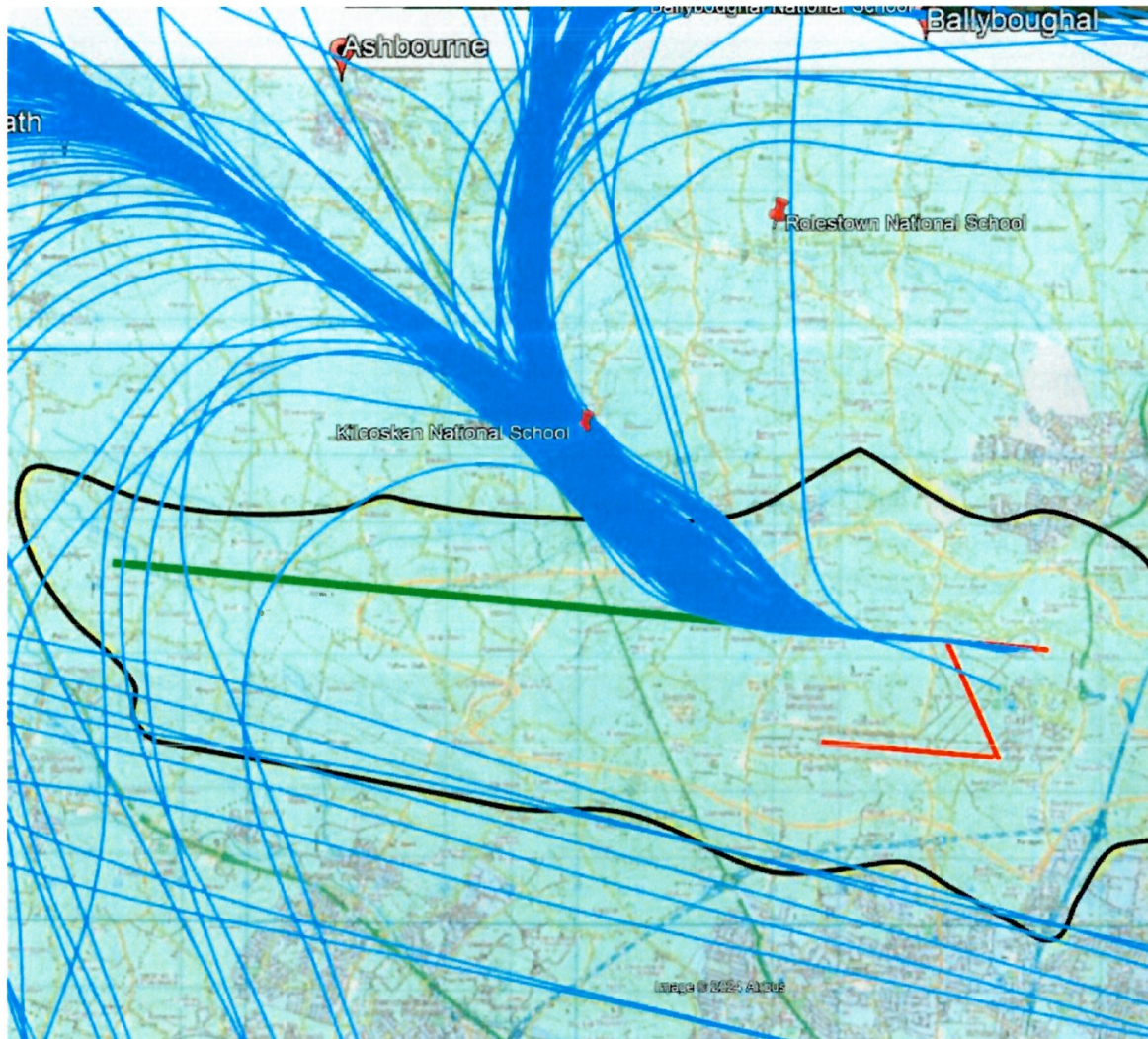


This chart shows the short term solution to allow the DAA operate the airport to its maximum capacity while complying with the planning permission. Note the offset approach to the north runway. This is in compliance with the safety requirements outlined by ICAO DOC 9643.



Here is the approach in blue overlaid on google maps, showing the flight path flying south of Portmarnock and Malahide. Note the red line is a missed approach track which would have possibly 1 aircraft per day use, rather than over 300 aircraft depart over populated areas.





Here is a 24 hour period of flight paths, with the Black outline showing the only approved planning permission EIS, with the green proposed flight path used for that planning application.

Because the aircraft have to make so many turns their ability to climb is reduced significantly, and therefore the noise impacts of departure tracks with large turns compared to straight departures is compounded, with aircraft flying lower for longer periods creating more noise.

This combined with ATC instructing aircraft to turn off the departure tracks and increase speed at low levels, again increases the noise impacts even further.