

S.37

File With

SECTION 131 FORM

Appeal No

ABP— 314485-23

Defer Re O/H

☐

Having considered the contents of the submission dated/received 12/12/2023
from Bryon Beggon 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 issues

Section 131 not to be invoked at this stage.

☒

Section 131 to be invoked — allow 2/4 weeks for reply.

☐

Signed

Pete B...

Date

13/12/2023

EO

Signed

Date

SEO/SAO

M

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

Task No

Allow 2/3/4 weeks

BP

Signed

Date

EO

Signed

Date

AA

LDG-068625-23



Planning Appeal Online Observation

Online Reference
NPA-OBS-002883

Online Observation Details

Contact Name
bryan beggan

Lodgement Date
12/12/2023 00:59:16

Case Number / Description
314485

Payment Details

Payment Method
Online Payment

Cardholder Name
Bryan Beggan

Payment Amount
€50.00

Processing Section

S.131 Consideration Required

☒ Yes — See attached 131 Form

☐ N/A — Invalid

Signed

Pat B

EO

Date

13/12/2023

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

☐

Yes

☐

No

Request Emailed to Senior Executive Officer for Approval

☐

Yes

☐

No

Signed

EO

Date

Finance Section

Payment Reference

ch_3OMKJcB1CW0EN5FC0mgHxktX

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date

Bryan Beggan

The Briars
Hickeys Lane
Baltrasna
Ashbourne
Co. Meath
A84RX45

An Bord Pleanála via online submission

Bord Pleanála Case reference: PL06F.314485

Planning Authority Case Reference: F20A/0668

Observations relating to Bord Pleanála Case reference: PL06F.314485 due to loss of amenity, health impacts and loss of property value as a result of avoidable noise pollution from Dublin Airport North Runway

To Whom it may concern,

The relevant action under consideration by An Bord Pleanála (ABP) is ostensibly limited to changing the regulation of night flights at Dublin Airport, specifically conditions no. 3(d) & no. 5. I accept that Dublin Airport needs to expand and increase capacity and this may include expansion of the normal hours of operation. I expect the passenger cap of 32 million annual passengers will need to be increased and the runways can best be utilized by dual simultaneous departures at a rate of at least 60/hour which is double that presently being achieved.

However, the daa (Applicant) has shown bad faith in ignoring the conditions of the original grant of permission. They have simply flouted several of the conditions, in particular totally disregarding the noise provisions of the Environmental Impact Statement (EIS). Therefore, I feel it is untenable to approve this fundamentally flawed relevant action application and the appeal against it should be upheld and the relevant action denied in its entirety.

The constant refrain from daa has been that the route of the flight paths has been required by the IAA on safety and/or regulatory grounds. I am a private pilot and a civil engineer. Based on extensive research as part of the "North Runway Technical Group", I have concluded that operation of the runways at maximum capacity within the confines of the safety regulations is perfectly possible while remaining within the footprint of the originally granted EIS noise zones. While AirNav makes vague statements about complexity, safety and regulation that body has never stated that this conclusion is incorrect. Please see Appendix B – North Runway Technical Group Proposal, for details and further information is available at www.dublin-north-runway.com.

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.

Before seeking to change any aspect of their existing planning permission, the daa must surely bring itself into compliance with the existing granted permission. Failing that, the Applicant must accept that they are not in compliance with Condition 1 and file an honest application for retention of the non-compliant flight paths that are presently in use. Instead daa persists in pretending that the flight

paths are entirely unconnected to the planning permission and is now on the fourth set of routes since 2005, while nowhere near compliant with the original Environmental Impact Statement (EIS).

The planning ground for this observation is *Loss of amenity, health impacts and loss of property value resulting from unnecessary noise pollution* described here in specific instances:

Loss of amenity through noise pollution: In 2017 we purchased a property in Ashbourne Co. Meath, and invested hundreds of thousands of euro into this property. We invested in a very high spec of insulation, an air to water heat pump, a heat recovery system, triple glazed windows, and solar panels. We managed to bring the house BER rating to A1. This property does not require the windows to be open except when it is exceptionally hot during the summer. When the north runway became operational, we were shocked to hear the noise outside, and even more shocked that with the triple glazed windows and insulation, we have to turn the tv up really loud to drown out the noise in the evening from the aircraft overflying. We had in the past held frequent family and friend gatherings during the good weather. We no longer can hold such gatherings as with aircraft climbing through 3,000 - 4,500ft within 500m of our house, the noise of aircraft builds to 70dbA as often as every 90 seconds causing all conversation to stop each time. There is simply no comfort in sitting outside or even in the kitchen with the doors open so we no longer get any value from our garden and patio area.

Loss of sleep through noise pollution: Having at our own expense insulated the house and installed a heat-recovery ventilation system we have no direct room vents to the exterior. As a result we are less affected by the noise than many of our neighbours. However, we are forced to choose between overheating with windows closed throughout the warmer nights, or leaving them open and being awakened early by low flying aircraft. It is impossible to sleep beyond 06:30 each morning, including weekends, as a direct result of the flight path dropping disruptive aircraft noise on our home. Should this relevant action be granted this problem will become worse and start even earlier, the unpermitted flight paths presently in use would de facto be given retention and the noise pollution situation would be made permanent.

Reduction of property value through noise pollution: Were we now to move house to avoid the aircraft noise, the selling price will be reduced compared to before the opening of the runway. The value of our largest investment, our home, has been materially damaged by daa's failure to comply with condition 1 of the north runway planning permission.

2005 Environmental Impact Statement

The Environmental Impact Statement (EIS) submitted by daa in 2004, updated in 2005 formed a primary underpinning for ABP to grant the permission for the runway. This was of such importance that ABP called it out in the first sentence of Condition 1.

- Daa has outsourced aviation operations to AirNav (formerly IAA ANSP), but AirNav insists that they need not comply with the EIS / planning permission, describing planning as daa's problem.
- Daa has then simply forwarded the AirNav-designed procedures to IAA (the regulator) without having even the in-house capability to review them and verify compliance with planning permission. Daa's CFO told the Oireachtas Committee on Transport and Communications that the routing of flights "took them by surprise" when the runway started operations in August 2022. This despite daa as the "aerodrome operator" made the submission to the IAA.
- IAA insists that they have no remit regarding planning permission or suitability of the procedures' routing. As long as it does not break aviation law or ICAO standards, they will approve any submission on these grounds without regard for planning permission or quality of design. Thus, ABP must draw no inference of suitability of design from approval by IAA.

The result is that 100% of aircraft leaving the north runway leave the confines of the original EIS noise boundaries within 30 seconds of take-off. They are therefore at low altitude and climb power causing noise at much higher levels than permitted in the areas overflown. Each of the three state bodies involved blames the others and 30,000 people suffer.

We depended on the accuracy of that EIS in making the decision to spend several hundred thousand euro redeveloping our house rather than move. Had we known that the EIS could be simply ignored and 300+ aircraft each day were to be diverted over our house in contravention of the planning permission we would have not purchased and renovated our house in Ashbourne.

The recently submitted Environmental Impact Assessment Report

The following list shows the flaws in the Applicants EIAR submission that should render the application invalid and cause the appeal to be upheld.

1. Noise zones labelled as "permitted" in this submission do not match the 2005 Environmental Impact Statement which underlies the only granted permission for the north runway (ABP 2007). This appear to be an attempt to gain retention by stealth for the flight paths currently in use in breach of the 2007 planning permission. Should ABP grant this relevant action it will no doubt be interpreted by daa as a grant of retention for the new noise footprints that encompass an area inhabited by 30,000 people.
2. Upwards of 85% of the environmental impact of the changed flight paths occurs in Meath. Ashbourne, Ratoath and multiple smaller conurbations total to approximately 30,000 people in Meath directly affected by aircraft overflight. None of these people were involved in the public consultation that was strictly limited to Fingal; a clear breach of the Aarhus Convention. See excerpt from daa publication in Appendix C – daa Publicising the 2016 Public Consultation.

We made a decision to invest in redeveloping our home subsequent to this consultation with no knowledge that it had occurred. The daa's published documents show that 100% of consultation and publicity around that consultation occurred within Fingal. No information was published in Meath despite that being the location of the noise impact. In effect Fingal Co Co asked residents of Fingal whether they objected to airport noise being exported to

- Meath. Unsurprisingly not many objections were received and this formed the basis of their decision to grant permission for the relevant action.
3. The public consultation in 2016 used different routes and noise zones from the routes in this submission, rendering that consultation invalid. Had we been involved in the 2016 consultation we would no doubt have objected. However, it has become apparent that this would not have mattered as daa (via AirNav) has twice since then changed the flight path routes so they bear no resemblance to those in the public consultation. In any case daa presents this relevant action as pertaining to the time and number of night flights, not an application for retention of non-compliant flight paths. ABP must clearly understand that granting this relevant action will have consequences far beyond the number and times of night flights.
 4. The State bodies (Fingal Co Co, Meath Co Co, daa) have taken the position that only Fingal Co Co has standing regarding the planning permission. The daa insists that the planning permission has nothing to do with the routes. Therefore citizens in Meath have no means to engage in the planning process and are completely unrepresented while being subjected to the environmental impact. This call for submissions by ABP is the first opportunity anyone in Meath has had to participate in any way in the planning permission process for the north runway, more than a year after the runway opened and illegal flights began.
 5. Acceptance of the relevant action by ABP and thus retention of the present, unpermitted flight paths by stealth would set a precedent that ABP conditions should be ignored if inconvenient. Far from accepting the relevant action Fingal Co Co should be taking action to enforce the existing noise zone.
However, Fingal has a conflict of interests and has therefore taken no enforcement action regarding the flight paths / noise zones. If the environmental impact that happens in Meath were restricted, it would slightly increase the percentage of the environmental impact occurring in Fingal, albeit largely over empty fields and solar farms and certainly not over any densely populated area. ABP should not endorse Fingal Co Co's granting of the relevant action to move the noise and disturbance to people outside Fingal's jurisdiction who are not represented by Fingal Co Co and are not participants in the process.
 6. There are alternative routes that conform to the existing noise zone and increase the safety of operations without reducing the capacity of the airport. AirNav's failure to design the procedures well and daa's flagrant ignoring of planning permission should not be rewarded. This is not an issue of safety or regulatory compliance as implied by daa. AirNav (daa's proxy) and IAA, the regulator, have both publicly stated that compliance with planning permission is not their concern and they ignored it in performing their function. The breach can be repaired within the confines of the original Environmental Impact Statement upon which the 2007 ABP grant was based as per the first sentence of condition 1. An explanation of the proposal presented to daa and AirNav is included in Appendix B – North Runway Technical Group Proposal.

Please see Appendix A – Graphical analysis of north runway flight path history, for charts and especially Google Earth overlays of charts and actual flight data to explain the above bullets in more detail.

In summary 30,000 people are suffering under the noise pollution of aircraft that should not be overflying us according to Condition 1 of the only planning permission that permits the north runway to operate. As explained in Appendix D – Fingal Strategic Development, those aircraft should be over the empty fields and solar farms that have been reserved for the flight paths since 2007. There is no *safety, regulatory or technical reason that prevents daa from complying with the original noise footprint from the 2005 EIS*. Please do not allow daa and AirNav to persist in causing unnecessary

damage to citizens when a solution is possible. Please uphold the appeal and reverse Fingal's grant of permission in this case.

Finally, the future of Dublin airport, its expansion, and its prosperity is my and my families future. I am an airline pilot who relies on the airport. I want to see the airport operate to international best practices, and grow. Unfortunately, Dublin Airport is operated in a very non noise sensitive way. There are very few noise restriction in Dublin Airport, and the north runway doesn't even comply with their own noise restrictions. The blatant operation of these new routes against the published and approved planning conditions should not be allowed. Until the DAA operate as planned, and become a good neighbour, I would ask ABP to reject their proposals.

Regards,

Bryan Beggan

Appendix A – Graphical analysis of north runway flight path history

Google Earth was used to display the various flight paths that AirNav and daa have used for planning, consultation and finally implementation.

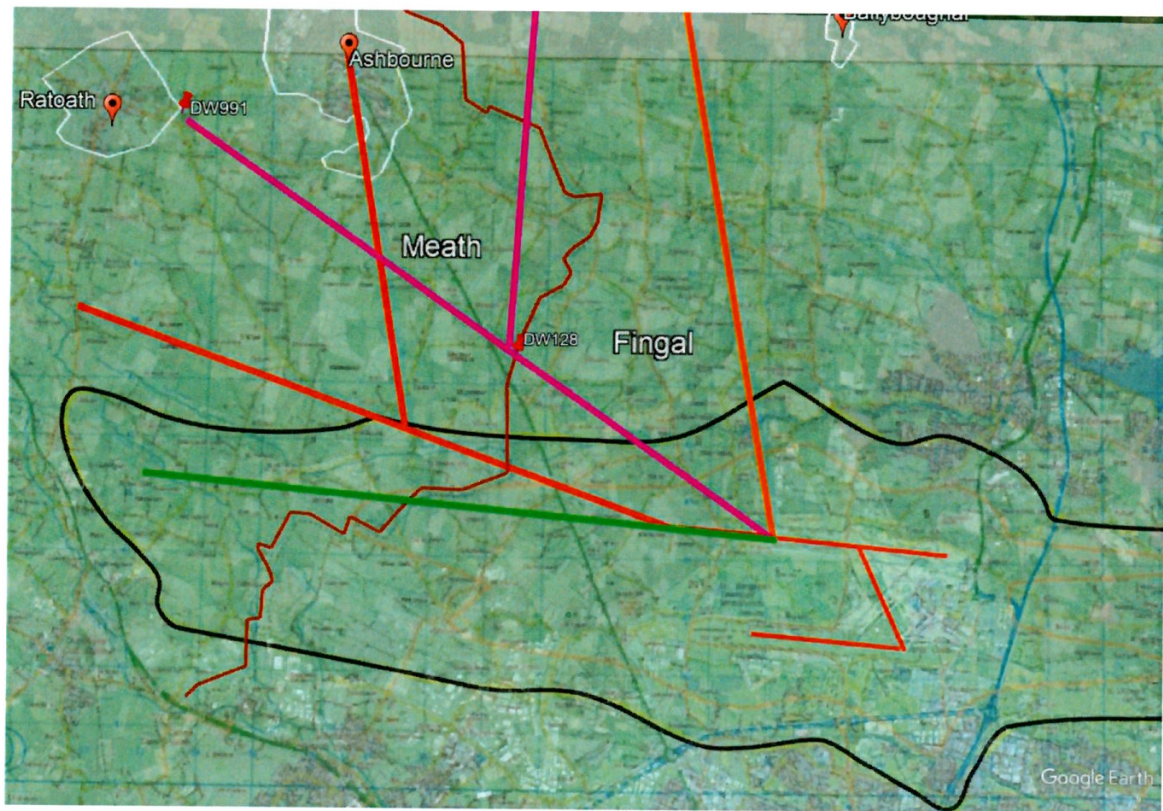


Figure 1 Various flight paths used by daa vs the permitted noise footprint

In Figure 1, the green line was the flight path used to create the original Environmental Impact Statement for the original planning application for the north runway project. The black outline is the resulting “outer noise boundary” from that EIS.

The red lines are the routes used in the 2016 public consultation using a 15 degree turn and subsequent 60 degree turn that would place the majority of the environmental impact in Meath. This public consultation took place only in Fingal.

When the runway opened daa was “taken very much by surprise” that aircraft followed the orange route over Fingal. They moved very quickly to have AirNav modify the route ensuring the impact is in Meath.

The magenta lines show the presently operational routes. Note the orange line was moved just over the Fingal-Meath border to a newly created waypoint at DW128.



Figure 2 Departures from Dublin Airport in 24 hours, leaving the permitted noise footprint within 30 seconds of take off.

ADS-B transponder data captured from aircraft departing DUB over a 24 hour period was used to show the paths actually flown in Figure 2. 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.

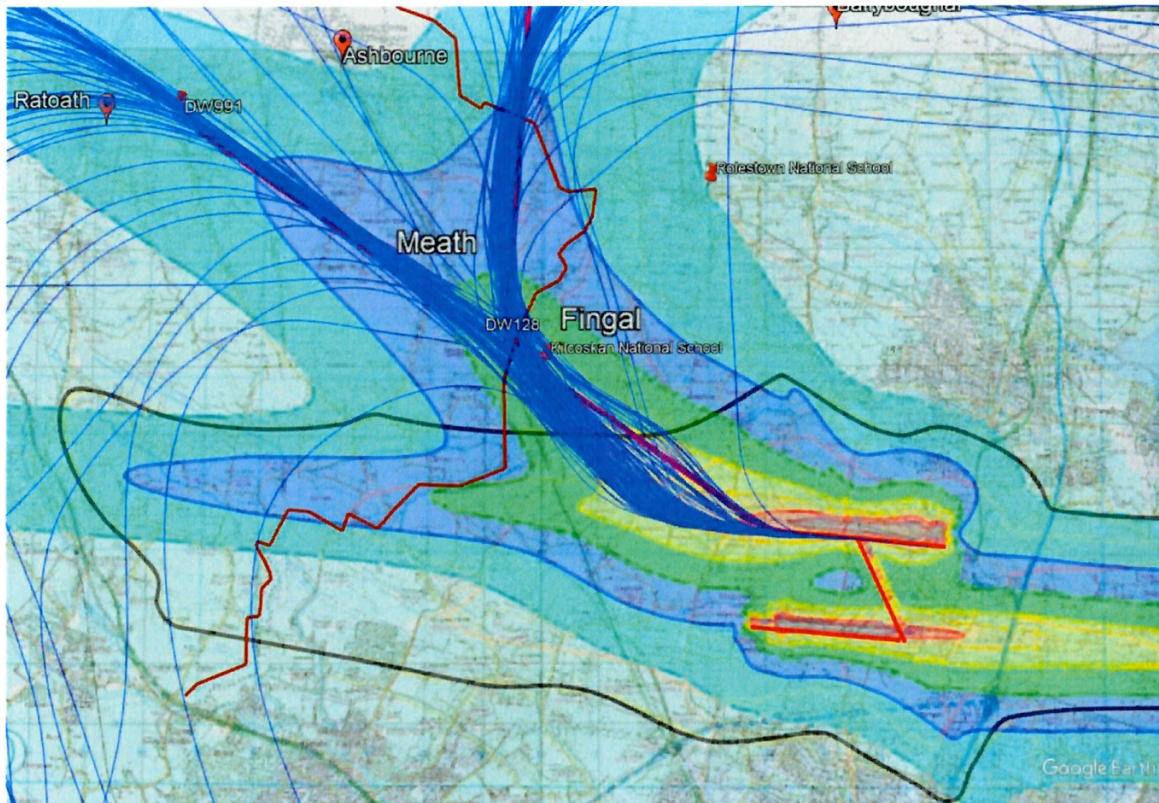


Figure 3 The present EIAR claims the coloured area as the "permitted" scenario .

In Figure 3, daa's Forecast Lday Noise Contours 2035 Permitted Scenario Figure 13C-23 are overlaid with the current traffic. The magenta tracks (from Figure 1) currently in use form the 4th flight-path design so far by daa/AirNav and only went into operation in February of 2023.

Examination of the original EIS demonstrates that the grey Noise Contours in Figure 3 traced from Figure 4 (in which the outer boundary is yellow) 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"

Figure 5 and Figure 6 show what daa proports to be permitted and proposed noise contours. The casual reader might accept these on face value and grant the relevant action on the basis that not much changes between the two. Instead this must be interpreted as an attempt to gain implicit retention permission without actually admitting that 100% of flights from the north runway have been in breach of the granted planning permission's condition 1.

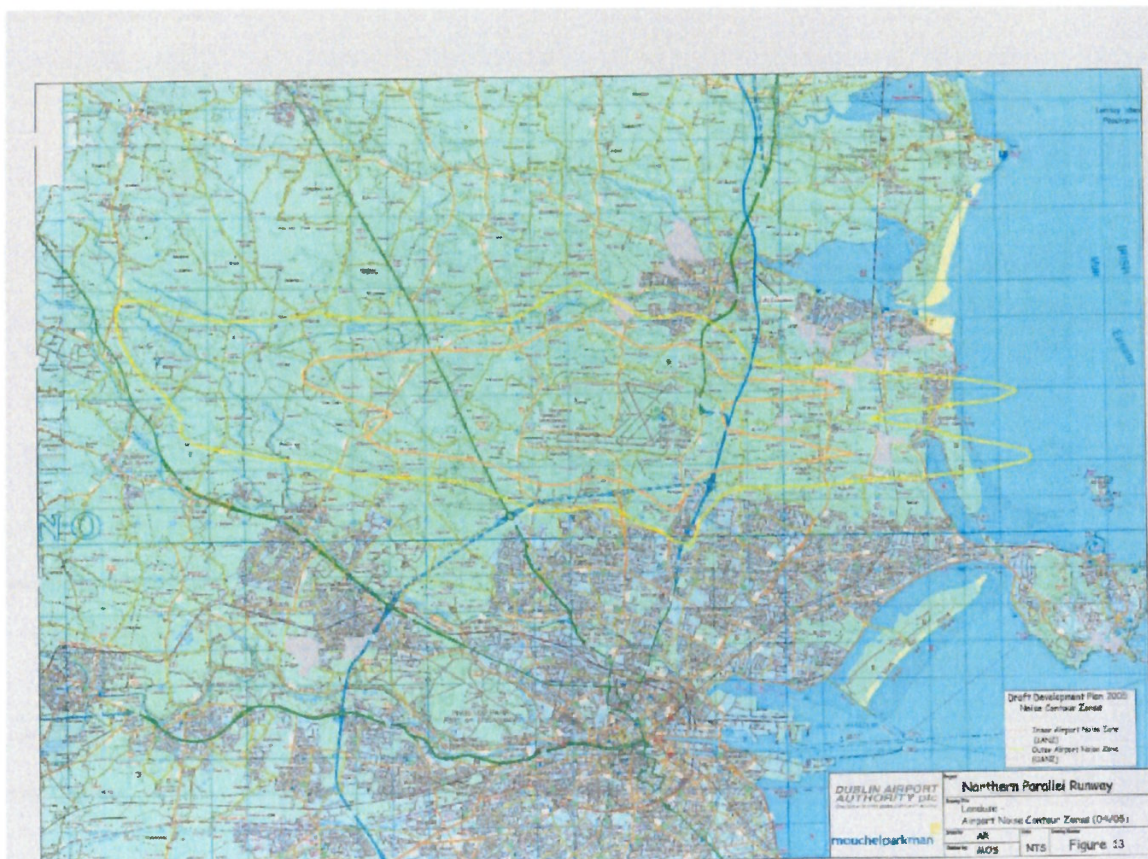


Figure 4 2005 Noise Boundary chart submitted as part of the EIS and used by Fingal Co Co on the strategic plans up through 2023.

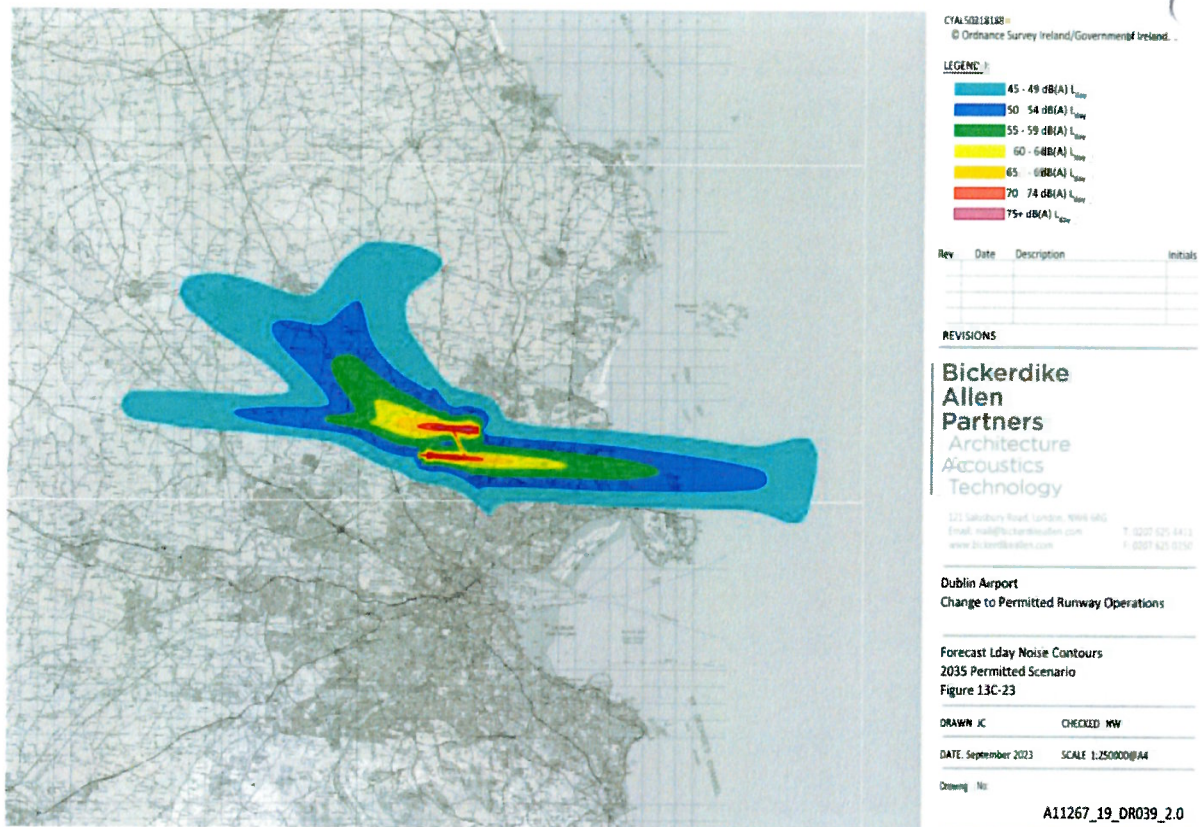


Figure 5 daa's 2023 EIAR claims these footprints are "permitted" despite bearing no resemblance to the EIS from the only planning permission in force for the north runway.

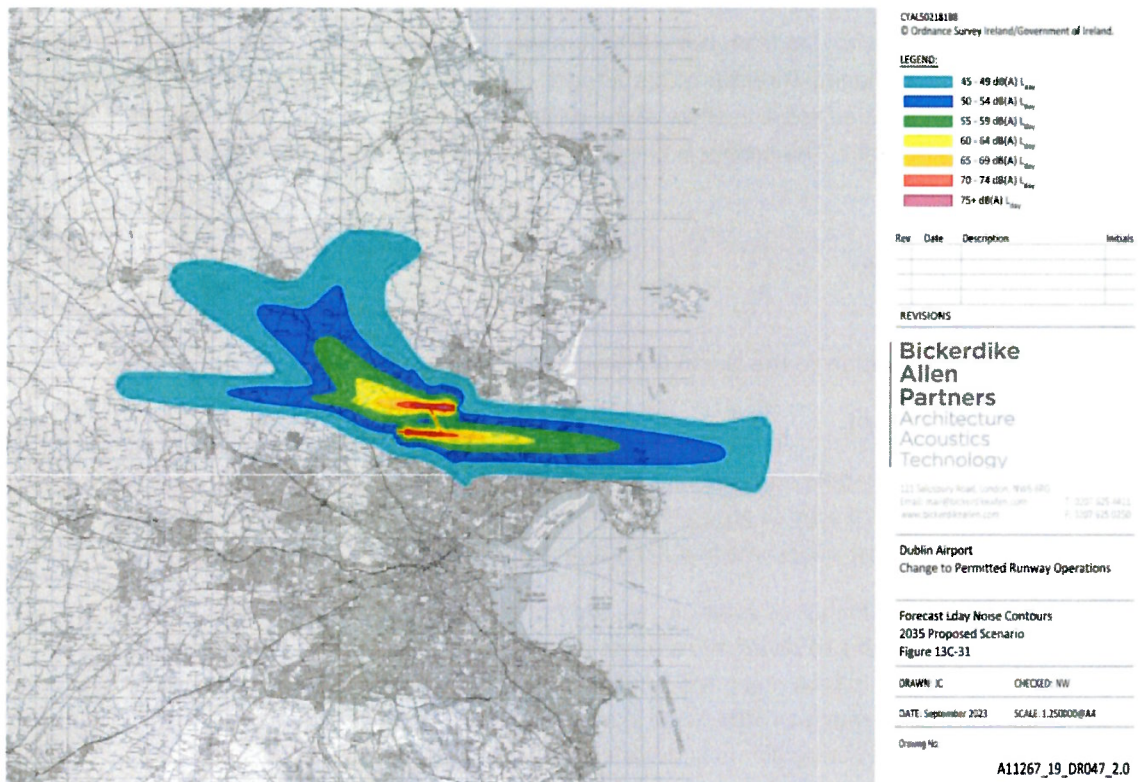


Figure 6 daa's Proposed Noise Contours are virtual identical to their so called Permitted ones, making the relevant action appear a trivial change.

Appendix B— North Runway Technical Group Proposal

The following is a letter to daa from our North Runway Technical Group. We have since met the CEO of daa plc and the Managing Director of the airport. Our proposal is being examined by AirNav and we have already identified some aspects of the design they had not considered that led to the current illegal flight paths. The proposal details follow this copy of the e-mail to daa.

05 September 2023

Dublin Airport Authority
by e-mail

RE: A constructive solution to the North Runway routing/noise problem.

To whom it may concern,

I am one of the many people who live along the departure track of the new north runway at Dublin Airport and a member of a small group including an engineer and private pilots along with commercial air transport pilots who regularly operate flights out of Dublin Airport.

- All of us are in favour of aviation. We are not trying to get the new runway shut down.
- We are not trying to divert the aircraft to make this someone else's problem.
- We want to help DAA make the smallest necessary changes that **increases departure capacity by as much as 50%** while alleviating the problem of aircraft flying over our houses.
- No change to existing planning permission is required to implement our proposal. It would bring DAA into compliance and remove the need for enforcement by Fingal County Council.
- Low level noise would be within the published noise footprints.
- We understand that AIRNAV has repeatedly claimed that this can't be done. This is not the case. **We have tested this in commercial simulators flown by professional pilots for all types that fly out of Dublin.**
- This proposal is a win for DAA and the airlines, a win for the residents and a win for Fingal County Council.

As you will likely be aware, all aircraft taking off from the new North runway at Dublin Airport make an immediate 30-degree right turn; in many cases followed by second 60-degree turn. These turns in the departure track were never foreseen, even by DAA, when the runway was designed. As a result, the people who live 5 or 10km from where the aircraft were supposed to go are now being overflown every day. Far from "a few cranks in St Margaret's", there are 30,000 people detrimentally affected because departing aircraft go the wrong way and fly over our houses at low altitude, max weight, max engine power making maximum noise.

We propose two modifications of tracks that are safe and legal and do not involve Weston or military airspace. It requires only DAA and IAA to be involved so it is not complicated to implement. The proposal increases the number of departures from the airport which is advantageous to DAA and helps reduce the noise pollution problem to the minimum possible. The track we propose falls within the planning permission that was granted so we are not even asking to change that permission; DAA can operate within it while increasing the number of flights per hour.

The changes required are these:

1. 28L missed approach to fly to the DAP VOR (end of the runway) and turn 30 degrees left, and climb continuously to 4000ft, the aircraft will fly above Weston airspace and not reach Military airspace.
2. 28R straight to 1.9 nautical miles, then turn 10 degrees to the right and climb on this track.

You may have been led to believe that changing the 28L missed approach cannot be done or is a difficult job or requires permission from the military. None of this is the case:

1. *The airspace to the south-west of the airport is restricted to the military.*
 - **Military airspace is not involved or impacted by this proposal. The proposed missed approach would NOT enter military airspace.**
2. *Gardai Air Support Unit (GASU) and Weston airport would be affected by changes to the RWY28L missed approach.*
 - **Weston and Military airspace are not involved** or impacted by this proposal. The proposed missed approach would NOT enter either one. **This has been tested in worst case scenarios (engine out, go-round at max weight with 10kt tailwind) and still clears both Weston and R15 (Baldonnel airspace).**
 - GASU is in constant contact with Dublin tower when operating in the control zone and does not have any problem with the runway 10R missed approach going through the same area which it currently does. Having an occasionally used missed approach over the Roadstone quarry and Ballycoolin industrial area will not have any effect on GASU.
 - **The existing missed approach is not fit for purpose; it routes missed aircraft into direct conflict with departing traffic.** It was designed for single runway operations and takes no account of the new north runway. It is now dangerous and requires intervention from the tower on every go around.
3. *A missed approach must allow for an engine-out go-around. This might not clear the R15.*
 - This can clear both Weston and the R15 and has now been tested in commercial simulators flown by professional pilots including for the worst-case scenarios with one engine out.
4. *Changing the missed approach would put aircraft over high density residential areas including Dublin city.*
 - Simulator flights demonstrated that missed approach aircraft can achieve 4000ft and level off before reaching any residential area. Climb is completed over the Roadstone quarry and Ballycoolin industrial area. They would then continue at 50% power making little noise along the reverse track of the runway 10R missed approach as already adopted and published by DAA.
 - Missed approaches are typically between .25% and .33% of all approaches, thus Dublin should have about 1 missed approach per day.
 - These high-density residential areas are already overflowed and there is no comparing and average of 1 flight per day at low power level at 4000ft to 350+ flights each day at climb power as they take off and climb towards 23,000ft.

We have described and explained the proposal in more detail at <https://www.north-runway.com>

We would welcome an opportunity to meet DAA to discuss this proposal. Please feel free to contact me by e-mail or phone.

Regards,

Gareth O'Brien

gobrien@yupon.com +353-87-277-9281

DAA, IAA and AirNav have relied on the technical nature of aviation to obfuscate the facts throughout this process, especially in the media. As a result several residents with technical knowledge and experience of aviation have formed the North Runway Technical Group. We include professional air transport pilots, private pilots, a civil engineer who is also a pilot, a retired training captain and retired air traffic controller. We have spent hundreds of hours researching the relevant ICAO standards, making FOI requests, downloading ADSB data and piecing together the truth of this 20 year project.

There are two fundamental requirements for operation of parallel runways according to ICAO Doc 9643 first published in 2004. It appears the IAA missed these when the original routes for the 2005 EIS were drawn up. They have modified subsequent iterations of the flight paths to account for these requirements.

1. Deconfliction of parallel simultaneous departures
2. Deconfliction of departure on one runway from the missed approach track on the parallel

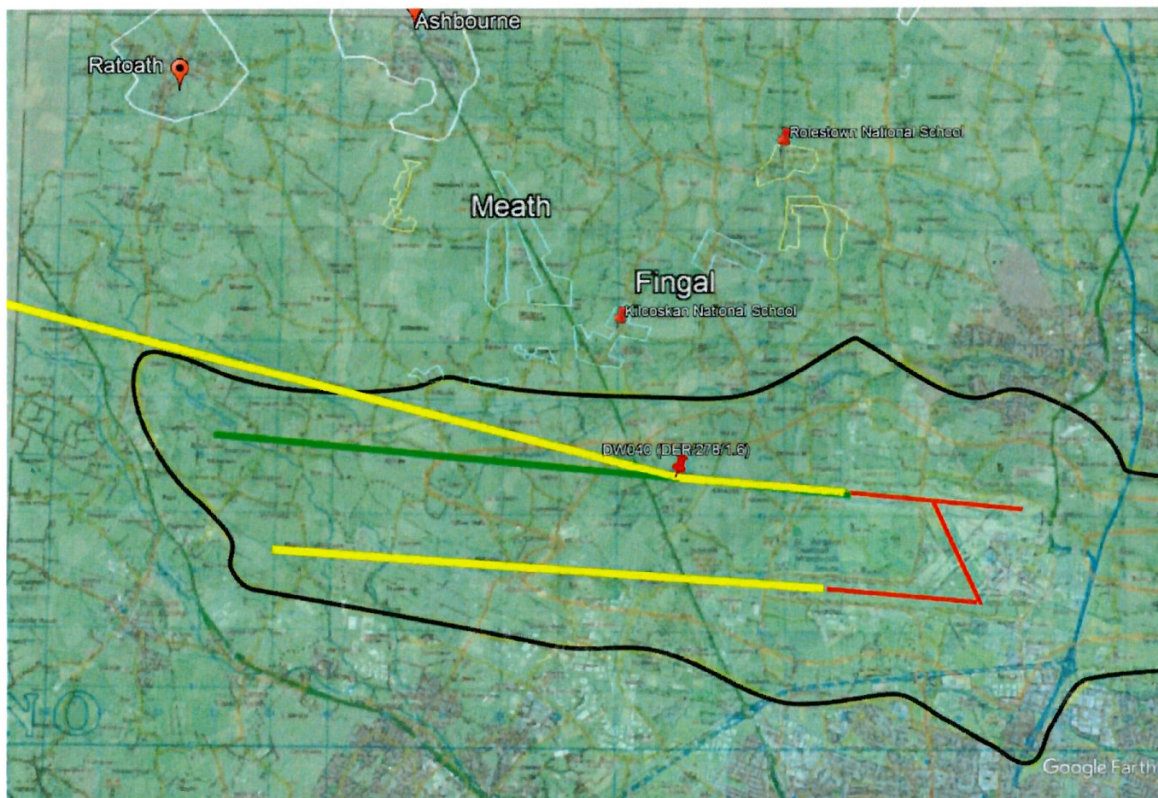


Figure 7 Proposed north runway departure track leaving the existing south runway departure as is.

In order to permit simultaneous departures from the two runways a 10 degree divergence must occur within 2 nautical miles (nm) of the departure end of the runway per ICAO Doc 9643. Both the existing (RWY28L) south runway departure track and the proposed (RWY28R) north runway departure track are shown in yellow in Figure 7. The original green line used to create the noise contours in the 2005 EIS was straight ahead for 5nm based on a copy-paste of the south runway. If a steeper climb profile is specified and enforced for departures (e.g. NADP1) the original noise footprint can be adhered to even with the 10 degree deviation.

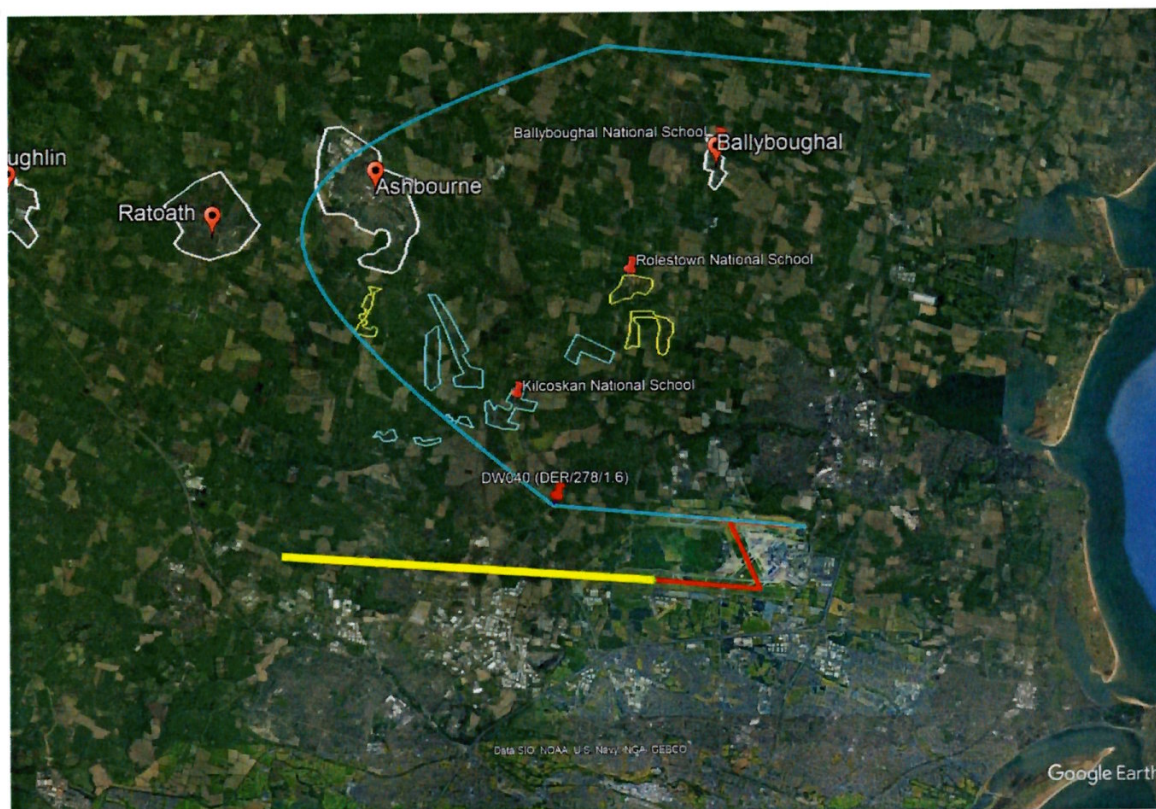


Figure 8 RWY28R missed approach deviates to the north to allow landing on the north runway while aircraft are departing from the south runway

The second divergence requirement for parallel runways is that there be 30 degrees between the departure track on one runway and the missed approach track on the other. See <https://www.dublin-north-runway.com/runway-info/missed-approach-track/> for an explanation of the function of a missed approach track.

An immediate short-term fix is available

In order to provide this deviation to allow departures from the south runway simultaneous with landings on the north runway (RWY28R) the missed approach track deviates as shown in Figure 8. Note that while departure tracks are used for 100% of daily departures, missed approach tracks are typically used for less than 0.5% of arrivals (approx. 1/day in Dublin). The procedures for this are already in place and published. **DAA could immediately swap the runway functions, departing from the south runway and landing on the north runway using the existing procedures and stop using the faulty and illegal flight paths over east Meath.** We do not consider this to be the best long term solution, but it could be adopted immediately as a stop-gap until the procedure design and promulgation exercise is completed properly.

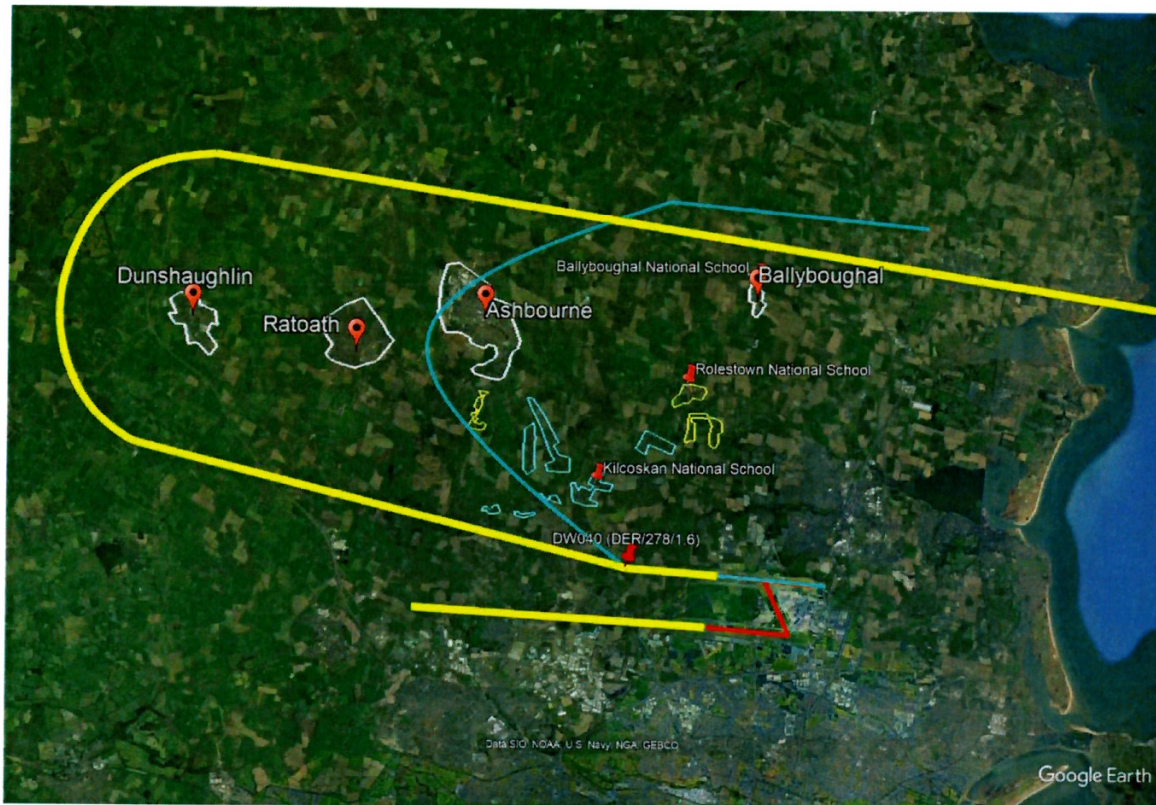


Figure 9 The proposed departure can co-exist with the present RWY28L departure and RWY28R missed approach

Adding our proposed departure track in Figure 9, there is no conflict between the existing RWY28R missed approach, the existing RWY28L straight out departure and our proposed RWY28R departure track.

Why did daa and AirNav send aircraft over East Meath?

The sole requirement that led to daa/AirNav turning 100% of departures over 30,000 people is the insistence on landing on the south runway. It appears from the original EIS that this decision is based on disturbance from landing noise over Portmarnock. Aircraft landing are much quieter than taking off, so the calculation appears to be 10,000 people in Portmarnock who are represented by Fingal Co Co must not be disturbed by landings. This made perfect sense with the 2005 departure flight path for the north runway over empty fields, however those flight-paths have been modified and the calculus should have changed.

To keep the lesser landing noise off 10,000 people in Portmarnock, 30,000 people in Meath who are not represented by anyone in this process and outside the permitted noise footprints must suffer the much greater noise pollution from take offs.

As shown in Figure 10 the existing RWY28L missed approach (white) has remained unchanged despite a new runway being built to the north. This now outdated procedure turns aircraft into conflict as a south runway missed approach flies right through north runway traffic, see Figure 11. Despite this AirNav has gone out of its way never to properly examine the option of turning the missed approach south, chiefly because it might disturb their colleagues in the AirCorp. Instead of turning the RWY28L missed approach to the south for 1 aircraft, they chose to turn 300+ departing flights daily along the magenta lines to the north.

We have demonstrated to daa and AirNav that it is possible to design a standards compliant RWY28L missed approach to the south within the existing Letter of Agreement between IAA and the Military.

There is no safety, regulatory or technical reason that prevents daa from complying with the original noise footprint from the 2005 EIS.

Changing the south runway missed approach to one of the options shown in Figure 10 and adopting our proposed departure flight-path for the north runway would enable flexibility and maximum efficiency from both runways without the need to turn the north runway departures. The solution shown in Figure 12 would increase safety, while complying with the standards and regulations and massively reducing the annoyance caused by the airport.

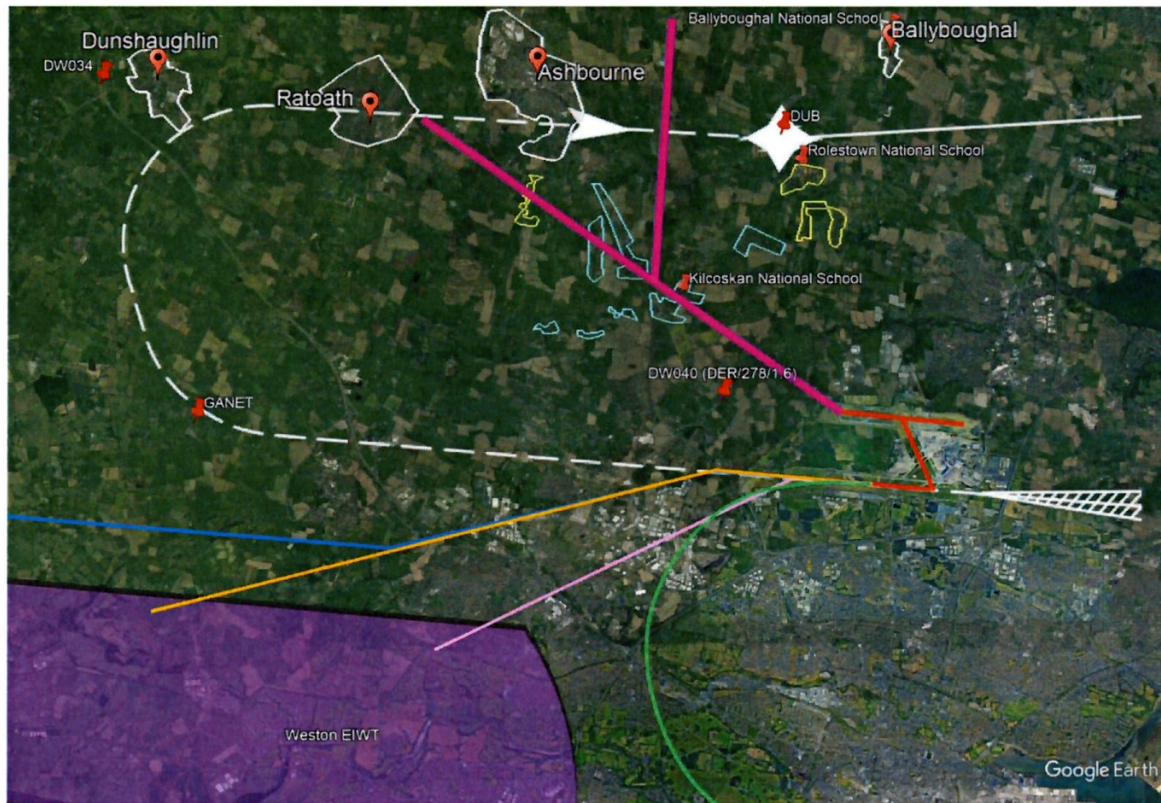


Figure 10 Multiple options for the RWY28L missed approach to deviate south are available – coloured lines. Weston's airspace stops at 2000ft. While the lines may appear to penetrate Weston's Area of Responsibility they actually overfly it.

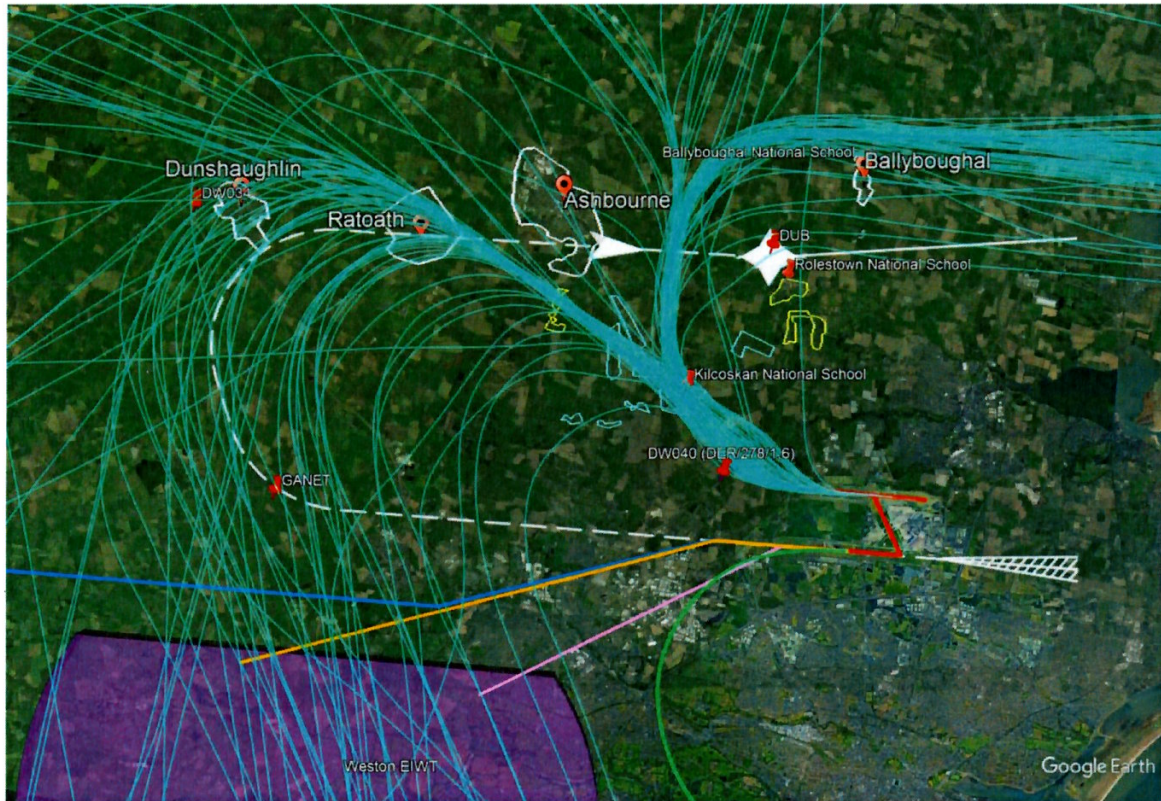


Figure 11 The unsafe existing RWY28L missed approach remains in operation despite being reported to IAA and daa.

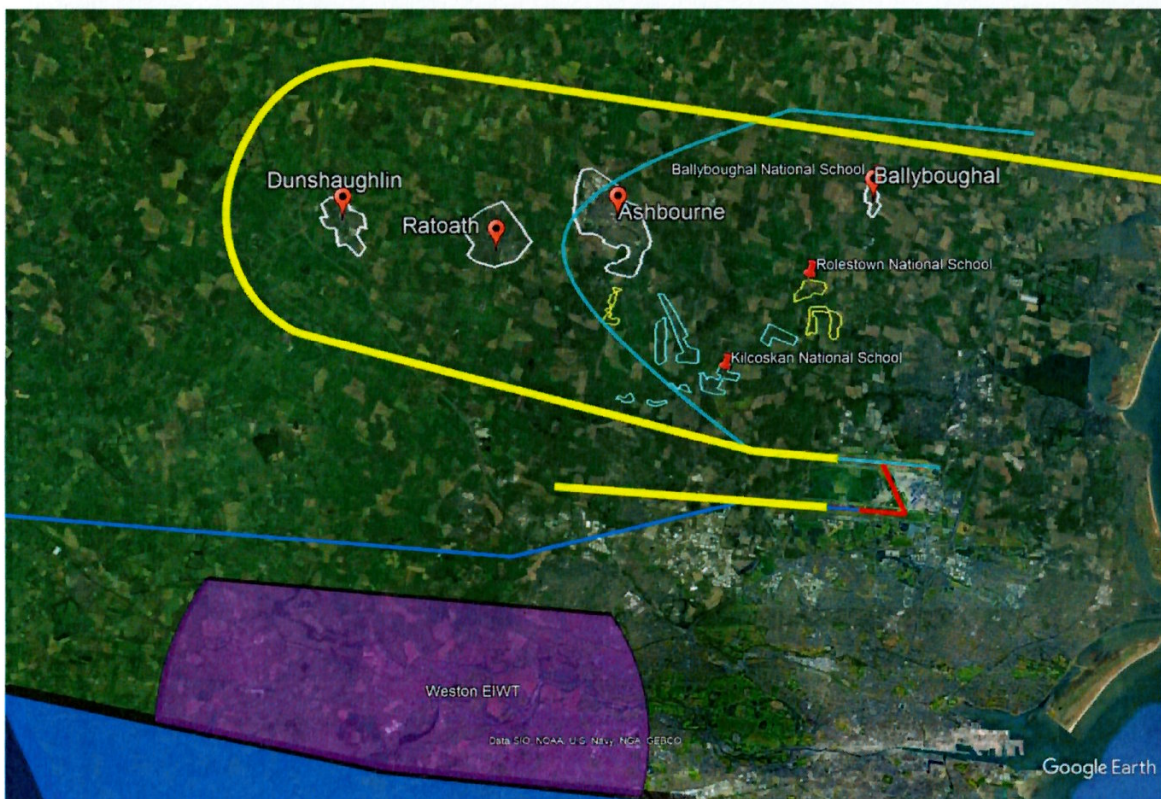


Figure 12 Proposed solution providing maximum capacity with lowest annoyance

Appendix C – daa Publicising the 2016 Public Consultation

From North Runway Report Consultation on Flight Paths and Change to Permitted Operations - February 2017 published by daa, it is quite clear that the public consultation was limited to Fingal while upwards of 80% of the effects of the changed flight paths and night time operations are in Meath.

2.6. Publicising the Consultation

2.6.1. Advertisements

There were seven advertisements placed in total, which ran in the following three titles over a two week period:

- North County Leader
- Fingal Independent
- Dublin Gazette

The same advertisement also ran for a one week period in the Northside People. Taken together these titles have a circulation of approximately 140,500 in the local community.

These advertisements contained the following information:

- Date, time and location of relevant public consultation events
- General North Runway information
- Information on the consultation topics that were to be discussed

A copy of the advertisement can be found in **Appendix C**

2.6.2. Posters

Posters advertising information regarding the consultation process and the associated public events were distributed to the following local libraries and two Fingal County Council offices:

- Balbriggan Library
- Baldoyle Library
- Blanchardstown Library
- Donabate Library
- Fingal County Council, Swords
- Fingal County Council Civic Offices, Blanchardstown
- Garristown Library
- Howth Library
- Malahide Library
- Skerries Library
- Swords Library
- Rush Library

A copy of the poster can be found in **Appendix D**

9

2.6.3. Leaflet Drop

33,000 leaflets were printed to advertise the consultation events and were distributed to local communities in the environs of the airport as follows:

- Portmarnock
- Malahide
- Robswall
- Feltrim
- Kinsealey
- Baskin
- Stockhole
- Cloghran
- Nevinstown
- Swords
- Boroimhe

- Ridgewood
- Knocksedan
- St. Margarets Village
- Kilreesk Lane
- Dunbro Lane
- Newtown Cottages
- Dunsoghly
- Broghan
- Ballystrahan
- Skephubble
- Rivermeade
- Shallon
- Newpark
- Bishopswood
- Ward Lower
- Ward Upper
- Kilshane
- Hollystown
- Tyrrelstown

A copy of the leaflet can be found in **Appendix E**

2.6.4. Emails to Stakeholders

Emails were circulated to various stakeholder groups, informing them of the consultation process, asking them to advise others in their areas and inviting them to provide their feedback and viewpoints on flight paths and the Change to Permitted Operations.

These stakeholder groups included:

- 7 Residents Associations
- Elected Representatives (refer to **Section 2.6.5**)

10

- Airport Staff, many of whom live in the Fingal area (seven internal staff briefings also took place during the consultation period)
- Individuals who had previously made a submission to the first phase of consultation during the summer of 2016
- >350 interested parties who had signed up to the online updates section of the North Runway website by the time the consultation took place

2.6.5. Communication with Elected Representatives

Elected Representatives were engaged with in various ways throughout the consultation process and encouraged to let constituents know about the opportunity to engage with the project. The following activities took place:

- On 10th October 2016, all Fingal County Councillors, TDs and Senators were advised of the upcoming consultation events. This same group received a reminder of the events on 21st October 2016
- On 17th October 2016, invitations were issued via email to all TDs and Senators in the Houses of the Oireachtas inviting them to attend an Information Clinic on North Runway in Buswell's Hotel, Dublin 2 on 27th October 2016. A reminder was sent to the same group on 25th October 2016
- Fourteen Elected Representatives attended the Information Clinic offering their viewpoints on North Runway and Dublin Airport operations as a whole.

2.6.6. Social Media

We have an active social media presence which was utilised throughout the consultation process. Dublin Airport has a popular Twitter page with over 195,000 followers and this account was utilised to promote the consultation on North Runway. Three 'tweets' and two Facebook posts were issued by daa to publicise the information events that were taking place in October.

11

Figure 2.1 – Twitter posts

12

Figure 2.2 – Facebook Posts

2.6.7. Media Coverage

Since the earliest stages of the project's development, daa has engaged with media (local and national) as a key channel to support project awareness and understanding and to address any questions relating to the project or indeed to the consultation and submission process.

Media coverage specific to this consultation process is outlined below, however there has been regular and ongoing North Runway related coverage since the decision to progress the project was announced in April 2016.

Appendix D – Fingal Strategic Development

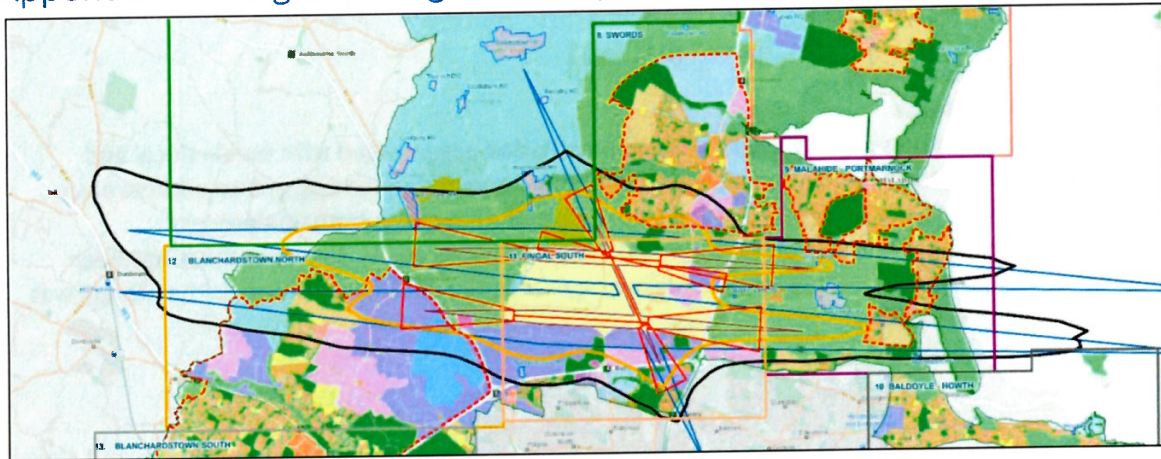


Figure 13 Fingal Development Plan 2017-2023

This is an excerpt from the current Fingal Development Plan map showing the orange inner noise boundary and black outer noise boundary. These along with the triangular “safety areas” all originated in the 2005 daa EIS.

It is clear that while denying publicly any relationship between flight paths and planning permission, daa has been quite aware that they are sending aircraft on flight paths that generate surface noise out of the permitted noise boundaries as shown in Figure 3. The consequence of this is made clear by Figure 13. My understanding is that daa has historically objected to planning applications within this zone, both in Fingal and in Meath. Planning permission has been rejected within these noise zones and other planning permission granted in areas to the north of and outside these boundaries. Several of the latter are now directly overflown at extremely low altitude and affected by aircraft noise.

The area to the west of the north runway has been reserved and kept sparsely inhabited for almost 20 years as the zone for departures from RWY28R to climb to altitude. It is imperative that daa is not rewarded for its casual disregard of environmental impact and planning permission conditions in its operation of this runway.