

File With _____

SECTION 131 FORM

Appeal NO: ABP 3/4485-22Defer Re O/H ☐Having considered the contents of the submission dated/ received 14/12/2023
fromMeath County CouncilI 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
(Inspector to advise)E.O.: Pate BenDate: 02/01/2024

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 2/3/4weeks – BP _____

EO: _____

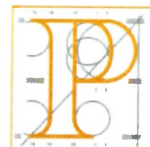
Date: _____

AA: _____

Date: _____

Validation Checklist

Lodgement Number : **LDG-069132-24**
Case Number: **ABP-314485-22**
Customer: **Meath County Council**
Lodgement Date: **14/12/2023 09:21:00**
Validation Officer: **Patrick Buckley**
PA Name: **Fingal County Council**
PA Reg Ref: **F20A/0668**
Case Type: **Normal Planning Appeal PDA2000**
Lodgement Type: **Observation / Submission**

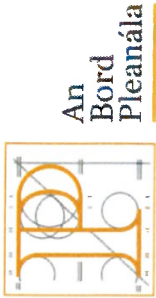


An
Bord
Pleanála

Validation Checklist	Value
Confirm Classification	Confirmed - Correct
Confirm ABP Case Link	Confirmed-Correct
Fee/Payment	Valid – Correct
Name and Address available	Yes
Agent Name and Address available (if engaged)	Not Applicable
Subject Matter available	Yes
Grounds	Yes
Sufficient Fee Received	Yes
Received On time	Yes
Eligible to make lodgement	Yes
Completeness Check of Documentation	Yes

Run at: 02/01/2024 09:31

Run by: Patrick Buckley



Details

Lodgement Date	14/12/2023
Customer	Meath County Council
Lodgement Channel	Email
Lodgement by Agent	No
Agent Name	
Correspondence Primarily Sent to	
Registered Post Reference	

Lodgement ID	LDG-069132-24
Map ID	
Created By	Patrick Buckley
Physical Items included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	F20A/0668

Categorisation

Lodgement Type	Observation / Submission
Section	Processing

PA Name	Fingal County Council
Case Type (3rd Level Category)	Normal Planning Appeal PDA2000

Fee and Payments

Specified Body	No
Oral Hearing	No
Fee Calculation Method	System
Currency	Euro
Fee Value	50.00
Refund Amount	0.00

Observation/Objection Allowed?	Yes
Payment	
Related Payment Details Record	

Observation

A proposed development comprising the taking of a 'relevant action' only within the meaning of Section 34C of the Planning and Development Act 2000, as amended, at Dublin Airport,

CO. DUBLIN, III THE TOWNSHIPS OF
Collinstown, Toberbunny, Commons,
Cloghran, Corballis, Coultry,
Portmellick, Haristown, Shanganhill,
Sandyhill, Huntstown, Pickardstown,
Dunbro, Millhead, Kingstown,
Barberstown, Forrest Great, Forrest
Little and Rock on a site of c. 580 ha.
The proposed relevant action relates
to the night-time use of the runway
system at Dublin Airport. It involves
the amendment of the operating
restriction set out in condition no. 3(d)
and the replacement of the operating
restriction in condition no. 5 of the
North Runway Planning Permission
(Fingal County Council Reg. Ref. No.
F04A/1755; ABP Ref. No.
PL06F.217429 as amended by Fingal
County Council F19A/0023, ABP Ref.
No. ABP-305289-19), as well as
proposing new noise mitigation
measures. Conditions no. 3(d) and 5
have not yet come into effect or
operation, as the construction of the
North Runway on foot of the North
Runway Planning Permission is
ongoing. The proposed relevant
action, if permitted, would be to
remove the numerical cap on the
number of flights permitted between
the hours of 11pm and 7am daily that
is due to come into effect in
accordance with the North Runway
Planning Permission and to replace it
with an annual night-time noise quota
between the hours of 11.30pm and
6am and also to allow flights to take off
from and/or land on the North Runway
(Runway 10L 28R) for an additional 2
hours i.e. 2300 hrs to 2400hrs and
0600 hrs to 0700 hrs. Overall, this
would allow for an increase in the
number of flights taking off and/or
landing at Dublin Airport between 2300
hrs and 0700 hrs over and above the
number stipulated in condition no. 5 of
the North Runway Planning

	Development Description
	<p>Permission, in accordance with the annual night time noise quota. The relevant action pursuant to Section 34C (1) (a) is: To amend condition no. 3(d) of the North Runway Planning Permission (Fingal County Council Reg. Ref. No. F04A/1755; ABP Ref. No.: PL06F.217429 as amended by Fingal County Council F19A/0023, ABP Ref. No. ABP-305289-19).</p> <p>Condition 3(d) and the exceptions at the end of Condition 3 state the following: '3(d). Runway 10L-28R shall not be used for take-off or landing between 2300 hours and 0700 hours except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports.'</p> <p>Permission is being sought to amend the above condition so that it reads: 'Runway 10L-28R shall not be used for take-off or landing between 0000 hours and 0559 hours except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports or where Runway 10L-28R length is required for a specific aircraft type.' The net effect of the proposed change, if permitted, would change the normal operating hours of the North Runway from the 0700hrs to 2300 hrs to 0600 hrs to 0000 hrs. The relevant action also is: To replace condition no. 5 of the North Runway Planning Permission (Fingal County Council Reg. Ref. No. F04A/1755; ABP Ref. No.: PL06F.217429 as amended by Fingal County Council F19A/0023, ABP Ref. No. ABP-305289-19) which provides as follows: 5. On completion of construction of the runway hereby permitted, the average number of night</p>

A Case Number	F20A/0668
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time aircraft movements at the airport shall not exceed 65/night (between 2300 hours and 0700 hours) when measured over the 92 day modelling period as set out in the reply to the further information request received by An Bord Pleanála on the 5th day of March, 2007. Reason: To control the frequency of night flights at the airport so as to protect residential amenity having regard to the information submitted concerning future night time use of the existing parallel runway'. With the following: A noise quota system is proposed for night time noise at the airport. The airport shall be subject to an annual noise quota of 7990 between the hours of 2330hrs and 0600hrs. In addition to the proposed night time noise quota, the relevant action also proposes the following noise mitigation measures: - A noise insulation grant scheme for eligible dwellings within specific night noise contours; - A detailed Noise Monitoring Framework to monitor the noise performance with results to be reported annually to the Aircraft Noise Competent Authority (ANCA), in compliance with the Aircraft Noise (Dublin Airport) Regulation Act 2019. The proposed relevant action does not seek any amendment of conditions of the North Runway Planning Permission governing the general operation of the runway system (i.e., conditions which are not specific to nighttime use, namely conditions no. 3 (a), 3(b), 3(c) and 4 of the North Runway Planning Permission) or any amendment of permitted annual passenger capacity of the Terminals at Dublin Airport. Condition no. 3 of the Terminal 2 Planning Permission (Fingal County Council Reg. Ref. No. F04A/1755; ABP Ref. No. PL06F.220670) and condition no. 2 of the Terminal 1 Extension Planning

	Permission (Fingal County Council Reg. Ref. No. F06A/1843; ABP Ref. No. PL06F.223469) provide that the combined capacity of Terminal 1 and Terminal 2 together shall not exceed 32 million passengers per annum. The planning application will be subject to an assessment by the Aircraft Noise Competent Authority in accordance with the Aircraft Noise (Dublin Airport) Regulations Act 2019 and Regulation (EU) No 598/2014. The planning application is accompanied by information provided for the purposes of such assessment. An Environmental Impact Assessment Report will be submitted with the planning application. The planning application and Environmental Impact Assessment Report may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of the Planning Authority during its public opening hours of 9.30 - 16.30 (Monday – Friday) at Fingal County Council, Fingal County Hall, Main Street, Swords, Fingal, Co. Dublin.
Applicant	
Additional Supporting Items	Yes

Decision Date	08/08/2022
County	
Development Type	
Development Address	Dublin Airport, Co. Dublin
Appellant	
Supporting Argument	

Patrick

Karen Hickey

From: Bord
Sent: Thursday 14 December 2023 15:27
To: Appeals2
Subject: FW: Bord Pleanala Case Reference: PL06F.314485
Attachments: Correspondence to ABP.pdf; Councillor Gillian Toole Submission.pdf; DAA - Cllr Alan Tobin submission.pdf; Submission to An Bord Pleanála Case Reference PLO6F.314485 Planning Ref. F20A_0668 Cllr Joe Bonner.pdf

From: Elaine Daly <Elaine.Daly@meathcoco.ie>
Sent: Thursday, December 14, 2023 1:23 PM
To: Bord <bord@pleanala.ie>
Subject: Bord Pleanala Case Reference: PL06F.314485

Dear sirs,

Please find attached correspondence from Meath County Council in relation to Bord Pleanala Case Reference: PL06F.314485.

I would be obliged if you would acknowledge receipt of same.

If you have any queries please do not hesitate to contact me.

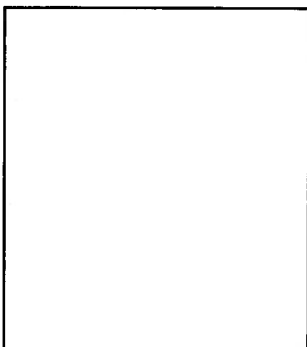
Kind regards,
Elaine.

Elaine Daly | Senior Executive Officer | Corporate Affairs and Governance
Meath County Council, Buvinda House, Dublin Road, Navan, County Meath C15 Y291
Tel: 046 9097053 | GSM: 086 0759387 | email: elaine.daly@meathcoco.ie | Web: <http://www.meath.ie>

My working day may not match your working day. Please do not feel obliged to reply to this email outside of your normal working hours.

MakeltMeath.com

[#MakeltMeath](https://www.instagram.com/MakeltMeath)



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Meath County Council's new corporate headquarters are:

**Buvinda House,
Dublin Road,
Navan,
Co. Meath, C15 Y291**

Comhairle Chontae na Mí

Teach Buvinda, Bóthar Átha Cliath, An Uaimh,
Contae na Mí, C15 Y291

Fón: 046 – 9097000/Fax: 046 – 9097001

R-phost: customerservice@meathcoco.ie

Web: www.meath.ie

Uimhir Chláraithe 00172770

**Meath County Council**

Buvinda House, Dublin Road, Navan,
Co. Meath, C15 Y291

Tel: 046 – 9097000/Fax: 046 – 9097001

E-mail: customerservice@meathcoco.ie

Web: www.meath.ie

Registration No: 00172770

Corporate Affairs and Governance

December 14, 2023.

An Bord Pleanála,
Appeals Section,
64 Marlborough Street,
Dublin 1,
D01 V902

**Re: Bord Pleanála Case reference: PL06F.314485;
Planning Authority Case Reference: F20A/0668;
A proposed development which relates to the night-time use of the runway system at Dublin Airport.**

Dear sirs,

The matter above was raised at the December Council Meeting of Meath County Council. It was agreed that the Elected Members would forward their submissions to the executive of the Council and we would issue a submission on their behalf. Therefore, I enclose herewith details of submissions from the Elected Members of Meath County Council.

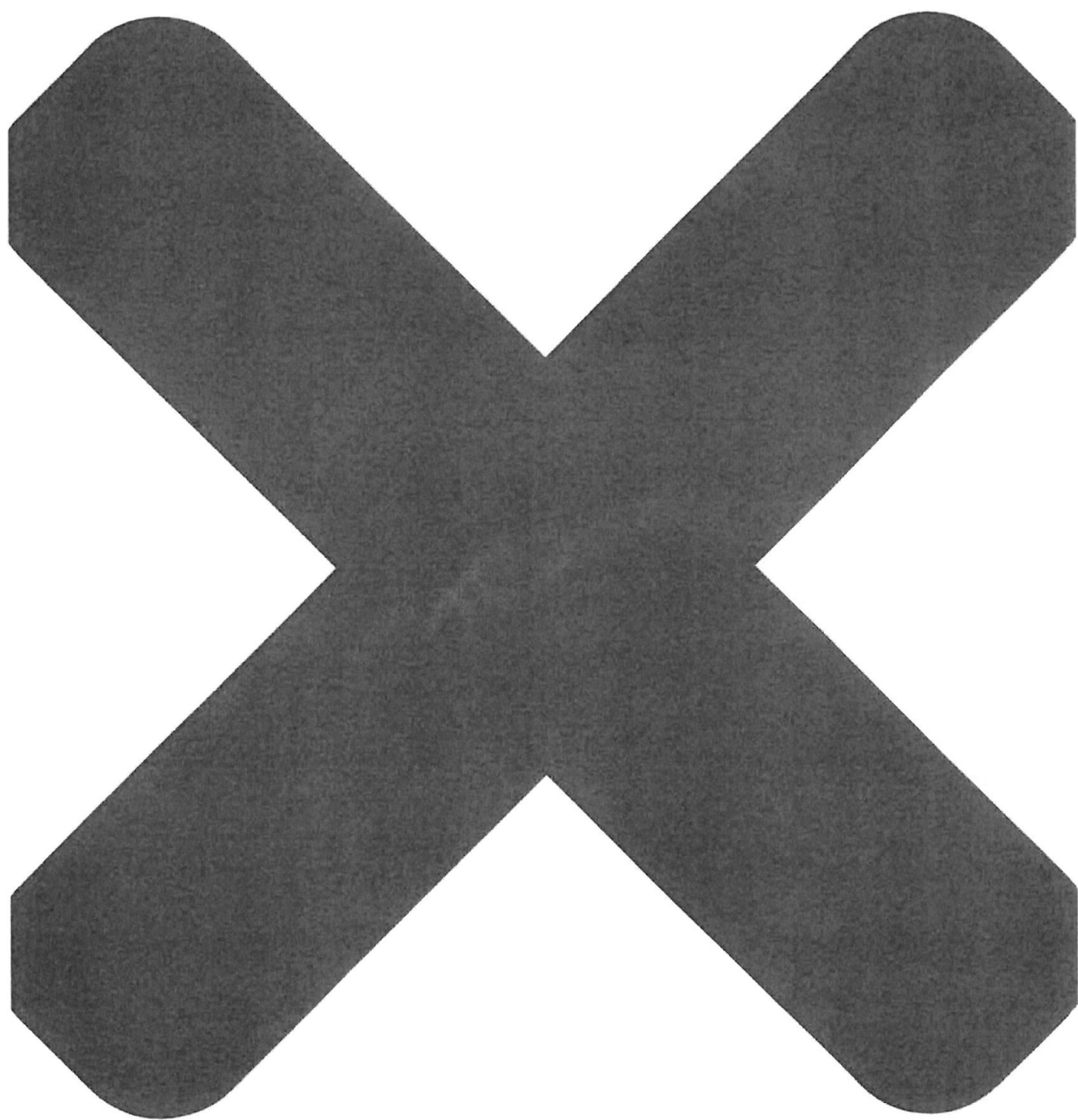
Please do not hesitate to contact me if I can assist further. I would appreciate also if you could acknowledge receipt of this submission.

Yours sincerely,

Elaine Daly
Meetings Administrator

Mobile: 086-0759387


Email: cservices@meathcoco.ie




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Functional ☐ Functional Always active 

Preferences ☐ Preferences 

Statistics ☐ Statistics 

Marketing ☐ Marketing 

Manage options Manage services Manage {vendor_count} vendors [Read more about these purposes](#)

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An Bord Pleanála and the “Relevant Action”

TL;DR

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. 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 Environmental Impact Statement that underlies the planning permission for the north runway.

daa is trying to pull a fast one by submitting before and after noise charts that are virtually identical, calling the before chart “permitted”, pretending that they are not ignoring their 2007 planning permission conditions. They hope ABP won’t notice this and will grant de facto retention to the current illegal flight paths just like Fingal County Council did.

ABP should not allow daa and AirNav to persist in causing damage to citizens when a solution is possible. The appeal should be upheld and Fingal County Council’s cynical grant of permission should be reversed.

It’s November 2023 and the DAA is at it again.

Their Relevant Action application was granted by Fingal County Council in August 2022 before the runway even opened and there are some questions about how that happened. Multiple people lodged appeals with An Bord Pleanála (ABP). As a result daa had to make a submission with a new Environmental Impact Assessment Report (EIAR). After 6 months of full-time paid work by consultants and staff the EIAR was submitted and then published by ABP all 500 pages of it. Anyone wanting to make an “observation” has 5 weeks to do so. Keep in mind that most of us working on such observations work full time jobs, so no imbalance in the process there at all.

The following are some elements “observed” in daa’s latest EIAR.

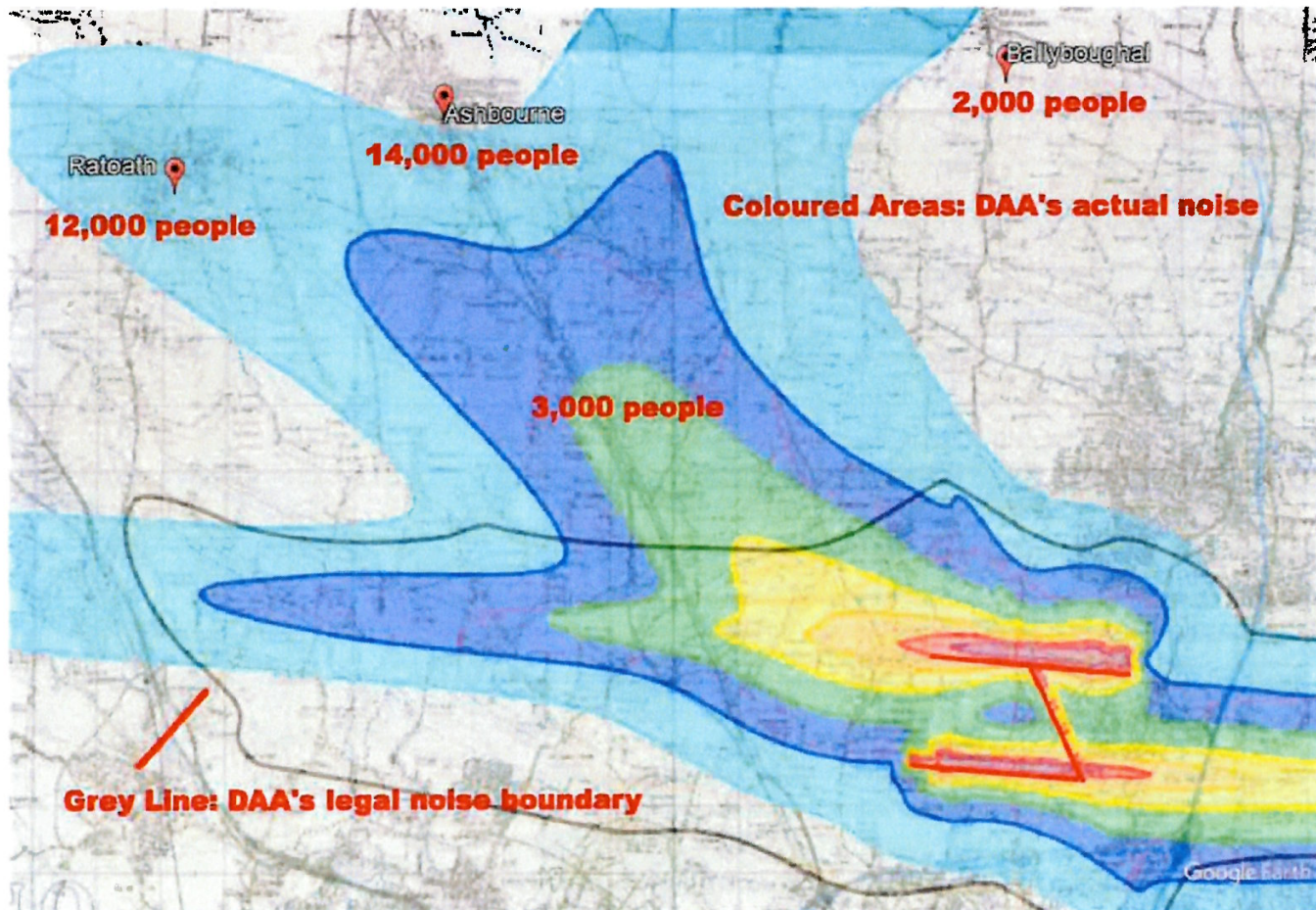
Accidental Retention

The relevant action under consideration by An Bord Pleanála (ABP) is ostensibly limited to changing the regulation of night flights at Dublin Airport. 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).

The constant refrain from daa has been that the route of the night 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.

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).





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 rubber stamp any submission.

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 redevelop 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 moved rather than invest further in Ashbourne.

2023 Environmental Impact Assessment Report

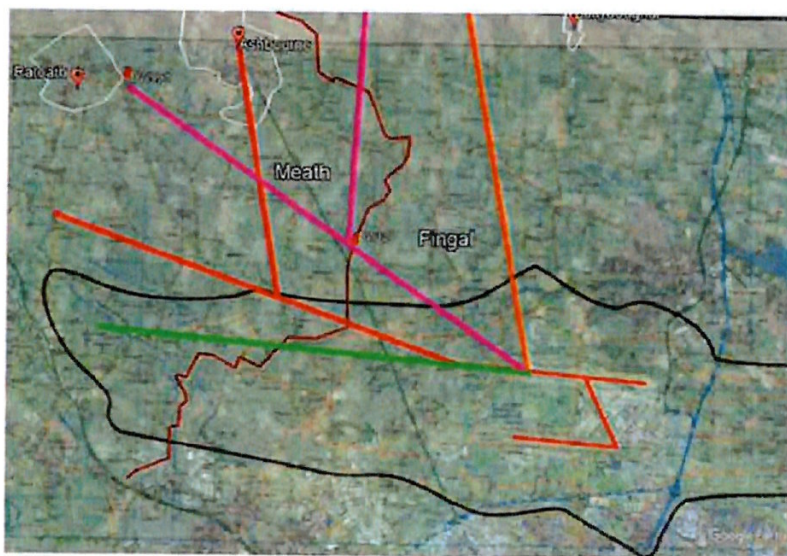
The following list shows the flaws in the Applicants EIAR submission that should render the application invalid and cause the appeal to be upheld.

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 appears 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.
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 taken no enforcement action regarding the flight paths / noise zones. If the environmental impact that happens in Meath were restricted, it would slightly increase environmental impact 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 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.

The many and varied North Runway Flight Paths



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

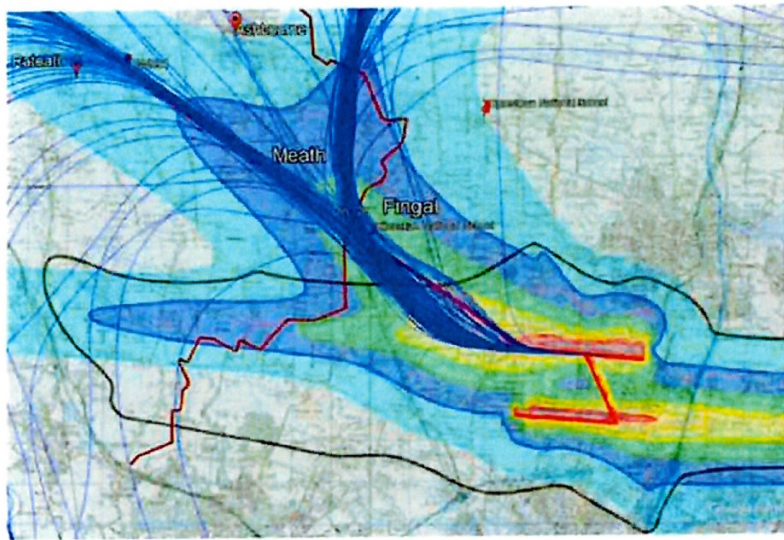
The green line was the flight path used to create the original Environmental Impact Statement for the original planning application for the north runway project. **The black outline is the resulting "outer noise boundary" from that EIS.**

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 border to a newly created waypoint DW128 in Meath. This is the only error daa admits to in the entire process and Kenny Jacobs apologized on PrimeTime for this while insisting that the magenta lines are now the "intended route".

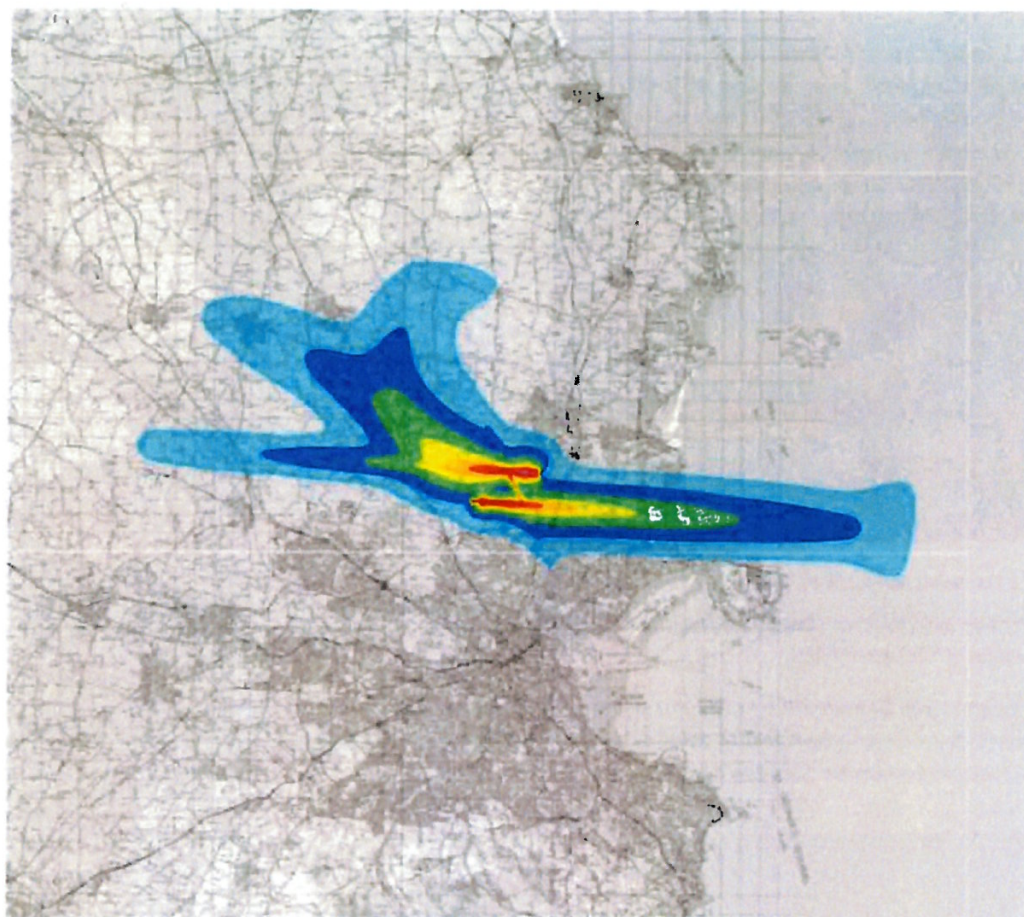
So, the only line that put air traffic over Fingal was a mistake and they're very sorry, while the illegal flight paths over Meath are intentional. Was this the deal for Fingal County Council to grant the relevant action and remove the night flight limits?



In this image daa's Forecast Lday Noise Contours 2035 Permitted Scenario Figure 13C-23 are overlaid with the current north runway traffic. The magenta tracks (from the previous image) 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 this image is traced from the next one (in which the outer boundary is yellow). They 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"





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LEGEND

45 - 49 dB(A) L_{day}
50 - 54 dB(A) L_{day}
55 - 59 dB(A) L_{day}
60 - 64 dB(A) L_{day}
65 - 69 dB(A) L_{day}
70 - 74 dB(A) L_{day}
75+ dB(A) L_{day}

Rev	Date	Description	Initials

REVISIONS

**Bickerdike
Allen
Partners**
Architecture
Acoustics
Technology

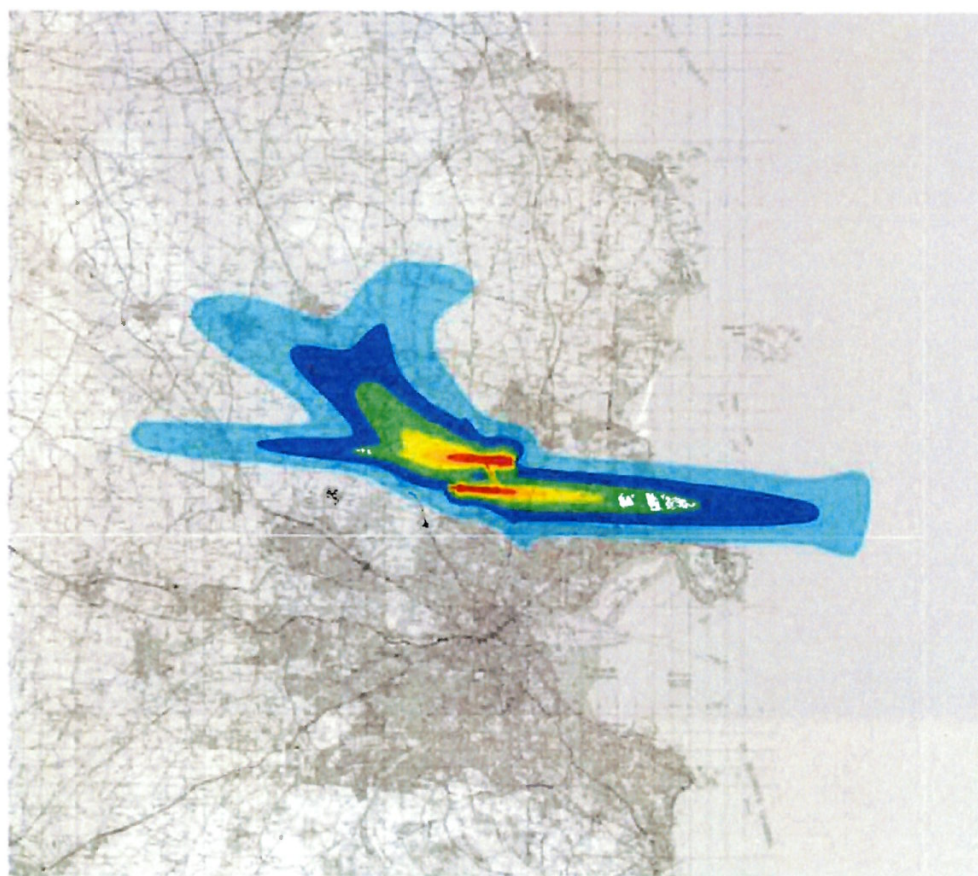
122 Trenchard Way, Suite 100, North Haven, CT 06460
Tel: 203-261-1111 Fax: 203-261-1112
www.bickerdikeallen.com

**Dublin Airport
Change to Permitted Runway Operations**

**Forecast Lday Noise Contours
2035 Permitted Scenario
Figure 13C-23**

DRAWN BY: JC	CHECKED BY: NA
DATE: September 2023	SCALE: 1:25000 @ A2
Drawing No: A11267_19_DR039_2.0	

This one daa calls "permitted". As is obvious it bears no resemblance to the actually permitted noise zone. If ABP were to grant this relevant action they would be accidentally granting retention of the non-compliant routes that daa has been using since the runway opened.



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LEGEND

45 - 49 dB(A) L_{day}
50 - 54 dB(A) L_{day}
55 - 59 dB(A) L_{day}
60 - 64 dB(A) L_{day}
65 - 69 dB(A) L_{day}
70 - 74 dB(A) L_{day}
75+ dB(A) L_{day}

Rev	Date	Description	Initials

REVISIONS

**Bickerdike
Allen
Partners**
Architecture
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Technology

122 Trenchard Way, Suite 100, North Haven, CT 06460
Tel: 203-261-1111 Fax: 203-261-1112
www.bickerdikeallen.com

**Dublin Airport
Change to Permitted Runway Operations**

**Forecast Lday Noise Contours
2035 Proposed Scenario
Figure 13C-31**

DRAWN BY: JC	CHECKED BY: NA
DATE: September 2023	SCALE: 1:25000 @ A2
Drawing No: A11267_19_DR047_2.0	

This one is the "proposed" scenario. As should be obvious daa are claiming that the relevant action will have little to no effect and should be granted. Of course you would have to choose to believe their existing routes are permitted to fall

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. 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*. ABP should not allow daa and AirNav to persist in causing damage to citizens when a solution is possible. The appeal should be upheld and Fingal County Council's cynical grant of permission should be reversed.

able of Contents

- T_LDR
- Accidental Retention
- 2005 Environmental Impact Statement
- 2023 Environmental Impact Assessment Report
- The many and varied North RunwayFlightPaths

Cookie Policy (EU)

Manage consent

An Bord Pleanála via online submission

Bord Pleanála Case reference: PL06F.314485

Planning Authority Case Reference: F20A/0668

Councillor Alan Tobin Meath Co Co on behalf of residents

Observations relating to Bord Pleanála Case reference: PL06F.314485 due to loss of amenity, health impacts, loss of property value and significant environmental impacts 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. However, the daa (Applicant) has shown bad faith in ignoring the conditions of the original grant of permission. They have flouted several of the conditions, in particular totally disregarding the noise provisions of the Environmental Impact Statement (EIS). This fundamentally flawed relevant action application should not be granted permission. 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. The "North Runway Technical Group", formed by me and includes several pilots, an air traffic controller and civil engineer, has concluded that operation of the runways at maximum capacity within the confines of the safety regulations can be achieved while remaining within the footprint of the originally granted EIS noise zones. While AirNav makes vague statements about complexity, safety and regulation neither that body nor IAA has ever stated that this conclusion is incorrect. The routing is the result of choices made by AirNav as to the manner in which they implemented certain safety standards, not a requirement of the standards themselves. Additional turns have been added purely for commercial benefit of the airlines with no consideration of the people living in South East Meath.

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 come 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: With aircraft climbing through 3,000 - 4,500ft within 2.5km of Ashbourne and Ratoath, the noise of aircraft builds to 65dbA 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 residents no longer get any value from gardens and patio areas. It is unreasonable to expect that Meath residents live permanently sealed into their homes with windows and doors closed year round.

Loss of sleep through noise pollution: Even in houses that have been insulated at homeowner's expense residents 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 homes. 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 residents 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 the largest investment most people ever make, their home, has been materially damaged by daa's failure to comply with condition 1 of the north runway planning permission.

Existing runway capacity is not being used

DAA has zero planning restrictions on number of flights between 0700 and 2300 daily. Management didn't properly prepare and now the only thing causing the delay in doubling the capacity of Dublin Airport is daa and AirNav's inability to operate the aerodrome effectively. See below for how to double the capacity without the relevant action.

Why should daa be given what will amount to unlimited night flights and unrestricted operation from 0600 through 24:00 when they are not using the capacity they have now? They could today launch at least double the departures from 0700-0900 with proper management. Gatwick Airport moves 40,000,000 passengers annually using a single runway and shuts down voluntarily at night. Yet Dublin Airport tells us they cannot expand without unfettered access to any route they want at any time of day or night. Why not?

How to double the capacity?

Based on actual aircraft transponder data, Dublin Airport has 30 departures/hour from 0600 to 0900. Remember before the north runway opened, aircraft still used to take off in the mornings while others landed on the same runway in between departures. This could still be done, but they don't have enough Air Traffic Controllers to begin.

30/hour from the north runway and let's be conservative

15/hour from the south runway

This is already a 50% increase! This could have begun as planned in March 2023 at 0700 without any change in planning restrictions or change in procedures, if suitably trained ATC staff were available.

Heathrow is able to launch aircraft every 60 seconds during their busiest periods. They have carefully designed Instrument Flight Procedures for this purpose; that's why it's sensible to design the procedures before you design the runway and taxiways that serve it. Design first, create the environmental impact statement, get the planning permission and then pour the concrete! Dublin Airport should be capable of operating as follows from 0700 for the morning rush if they improve the departure procedures.

40/hour from the north runway (every 90 seconds on average)

20/hour from the south runway interspersed with arrivals

= 60/hour: Double the present rate.

All this within the noise footprint of the 2005 Environmental Impact Statement on which their planning application was fundamentally built.

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 overflowed. Each of the three state bodies involved blames the others and 30,000 – 50,000 people suffer. Number includes Ashbourne, Dunshaughlin, Dunboyne and Ratoath plus rural South County Meath that include Ardcath and Clonalvy.

Residents of Meath depended on the accuracy of that EIS in making the decision to buy, build, remodel or extend homes. To allow the EIS to be ignored and 300+ aircraft each day to be diverted over these houses in contravention of the planning permission is to fundamentally undermine the system of planning permission.

The recently submitted Environmental Impact Assessment Report

The following list shows the flaws in the Applicant's 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 appears 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.
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.
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 various State bodies 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. Michael O'Leary of Ryanair has now publicly called for daa to do exactly that once again, in this case regarding the 32,000,000 passenger cap, another planning permission condition. Far from accepting the relevant action Fingal Co Co should have already taken action to enforce the existing noise zone but to date has not.
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 min. 30,000 people in Meath are suffering under the noise pollution of aircraft that should not be overflying them 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.

Regards,

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.

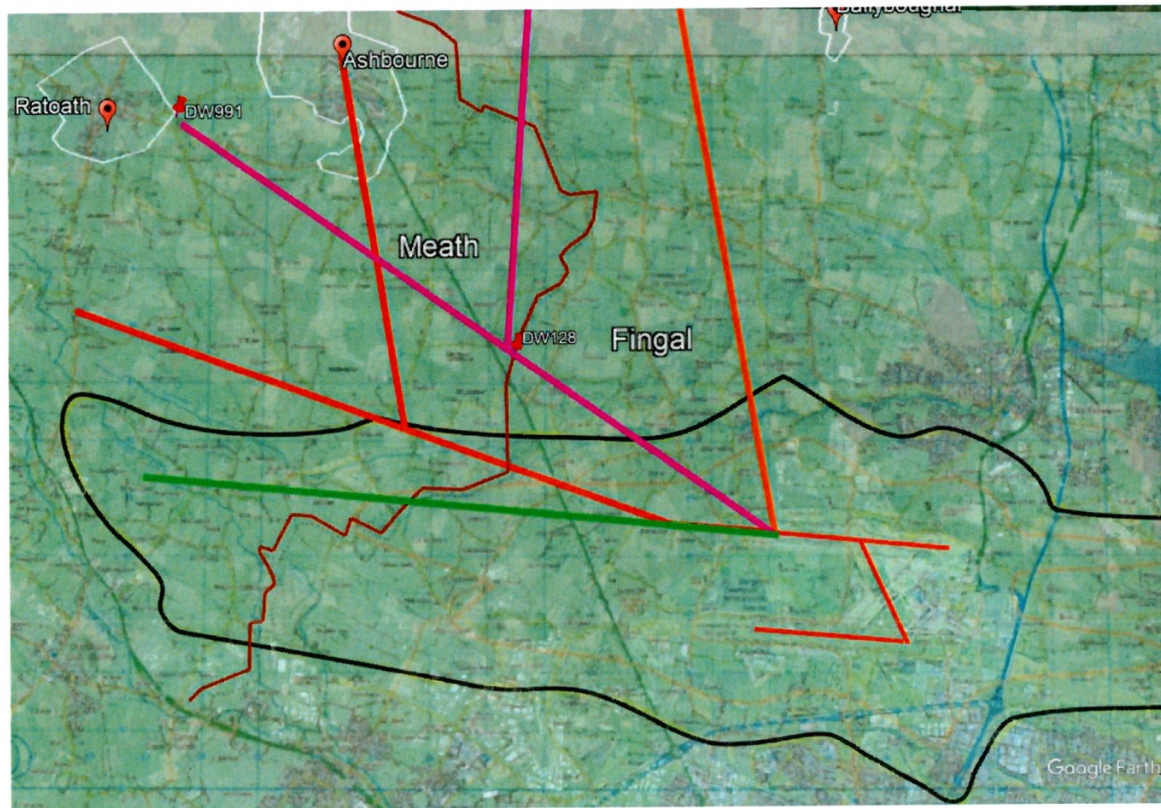


Figure 1 Various flight paths used by daa vs the permitted noise footprint

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.

ADSB 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.

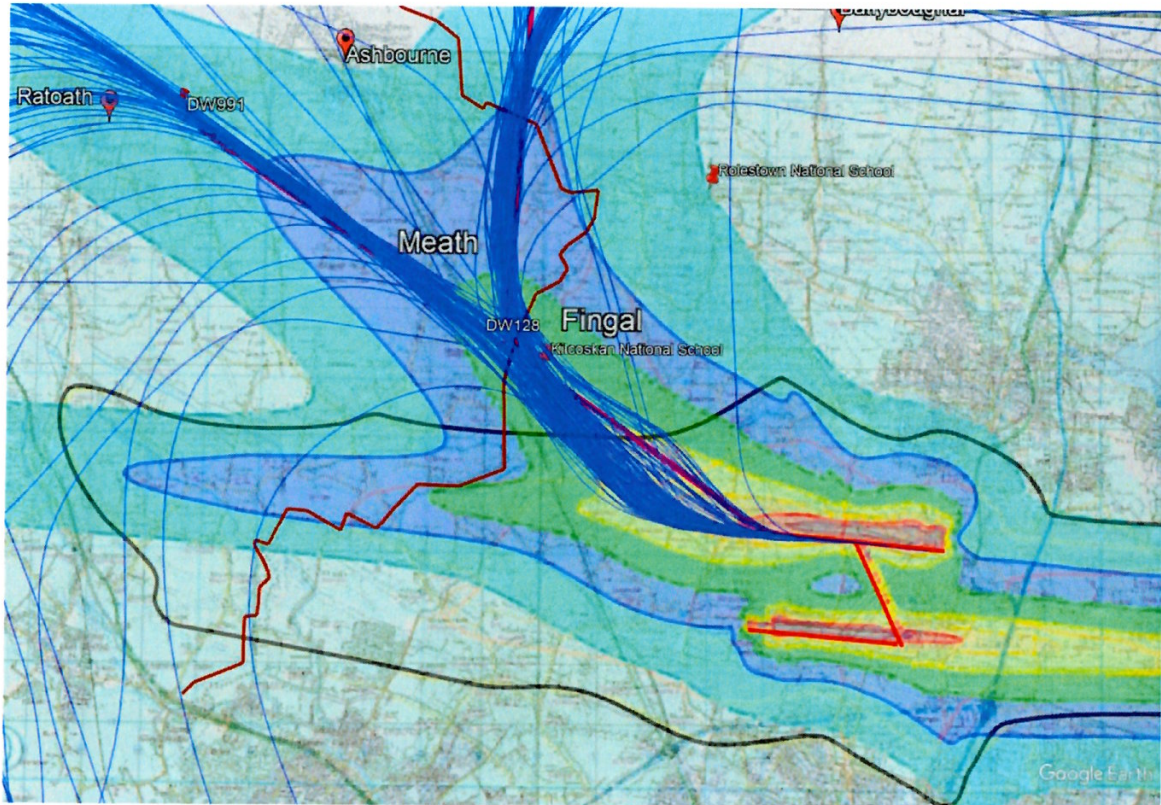


Figure 3 The present EIAR claims the coloured area as the "permitted" scenario.

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.

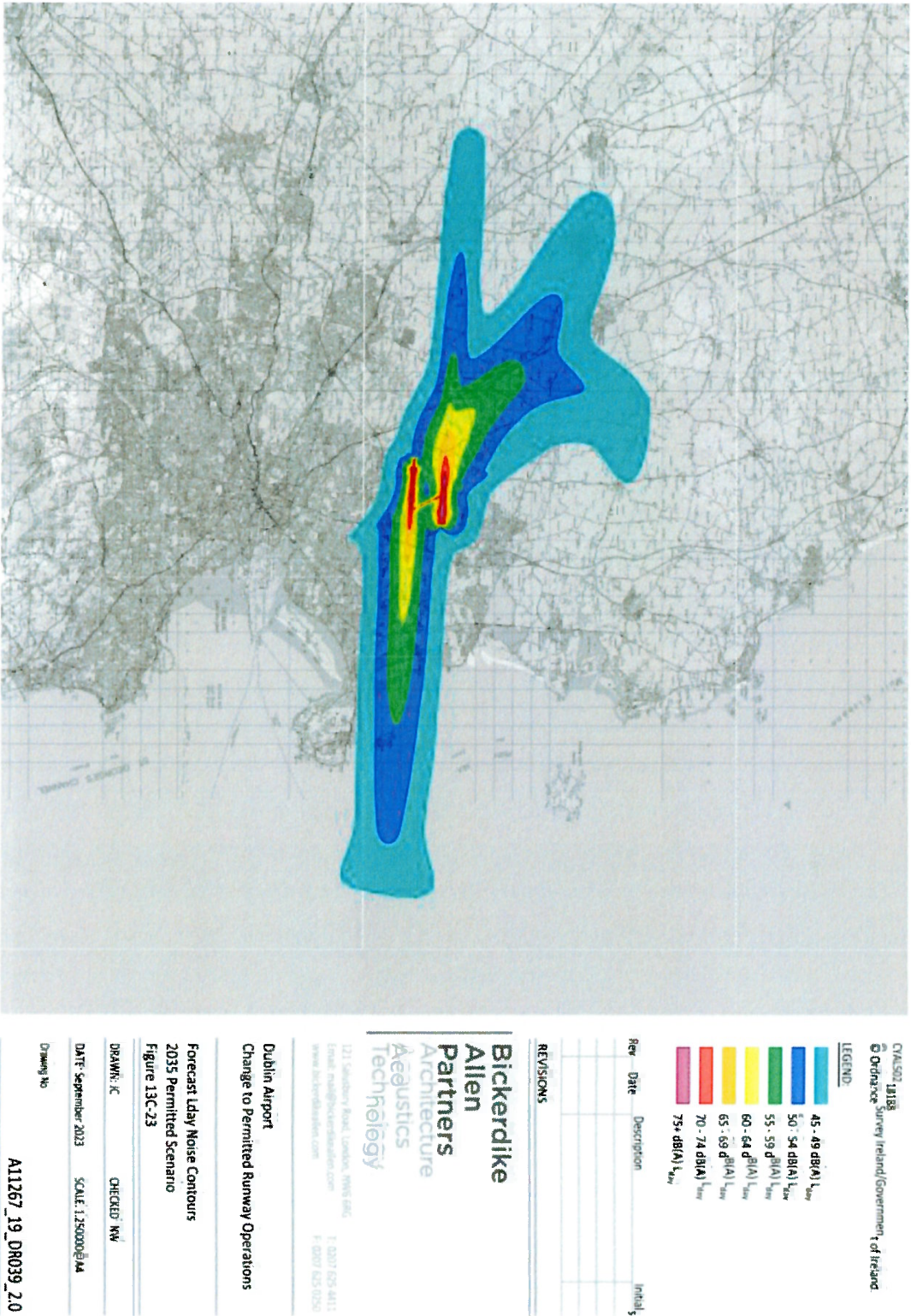


Figure 5 daa's 2023 EIAR claims these footprints are "permitted" despite bearing no resemblance to the EIS from the only planning permission in force for the north runway.

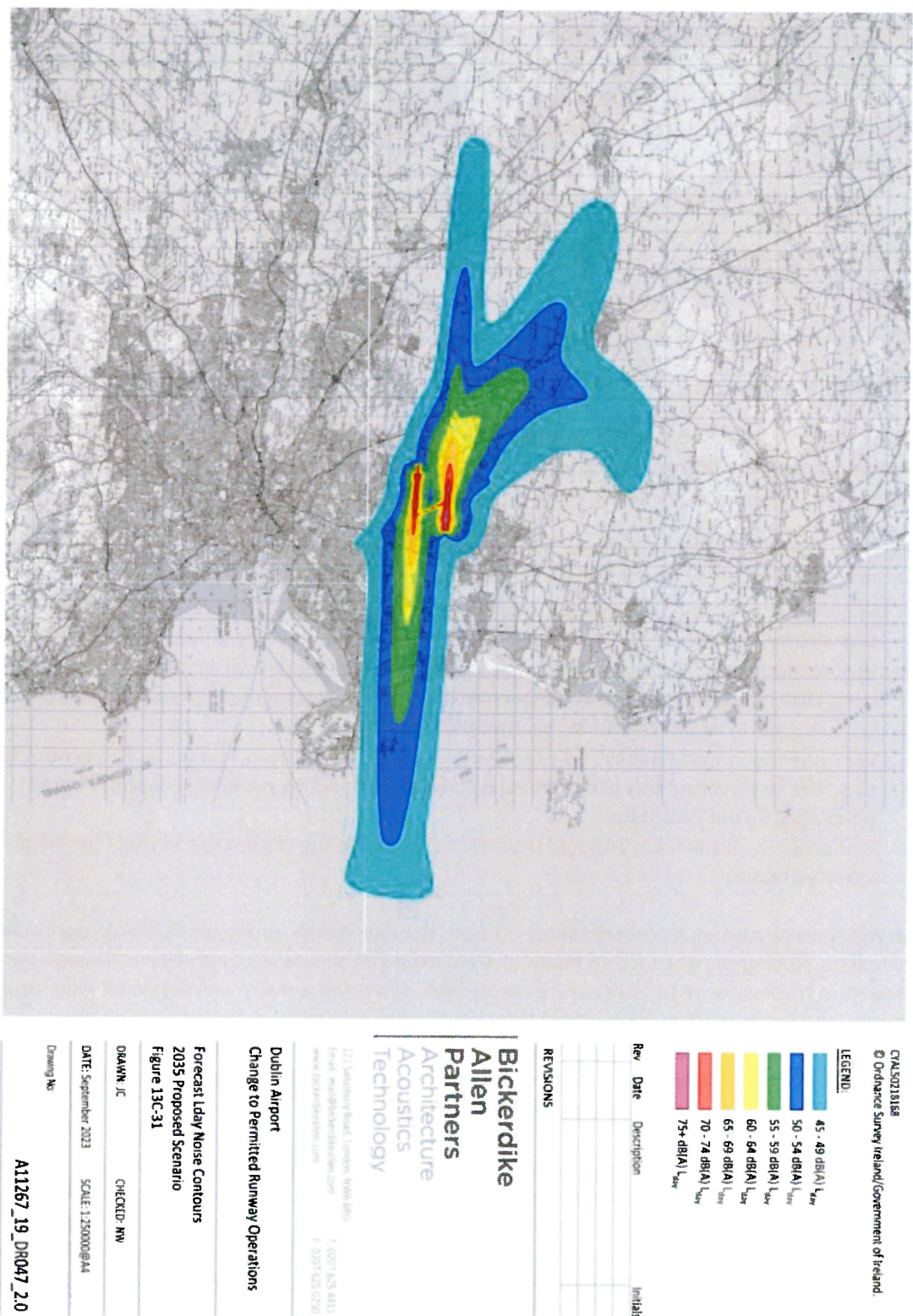


Figure 6 daa's Proposed Noise Contours are virtual identical to their so called Permitted ones, making the relevant action appear a trivial change.

Appendix B– North Runway Technical Group Proposal

The following is a letter to daa from the North Runway Technical Group. Representatives of the group have since met the CEO of daa plc and the Managing Director of the airport. The proposal is being examined by AirNav, the group having 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 (Baldonnell 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. The group includes professional air transport pilots, private pilots, a civil engineer who is also a pilot, a retired training captain and retired air traffic controller. They have spent hundreds of hours researching the relevant ICAO standards, making FOI requests, downloading ADSB data and piecing together the reality 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

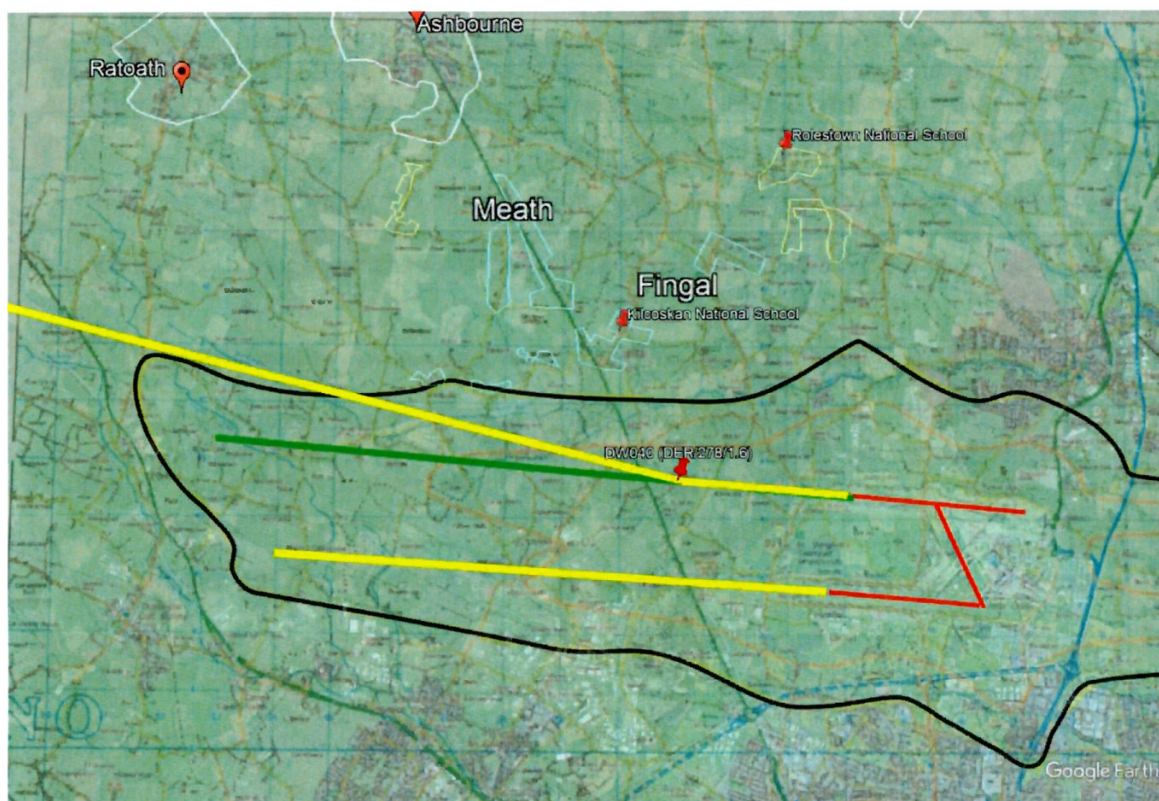


Figure 7 Proposed north runway departure track leaving the existing south runway departure as is .

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.

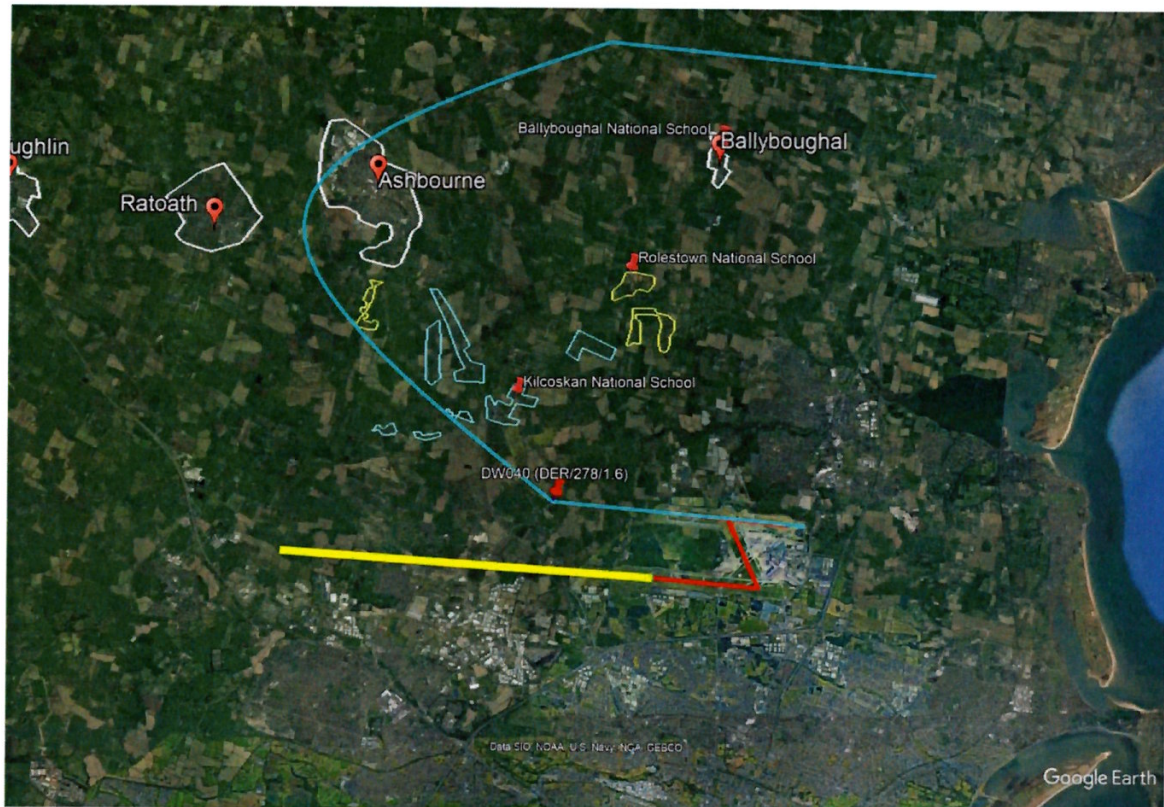


Figure 8 RWY28R missed approach deviates to the north to allow landing on the north runway while aircraft are departing from the south runway

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.** The Technical Group does 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.

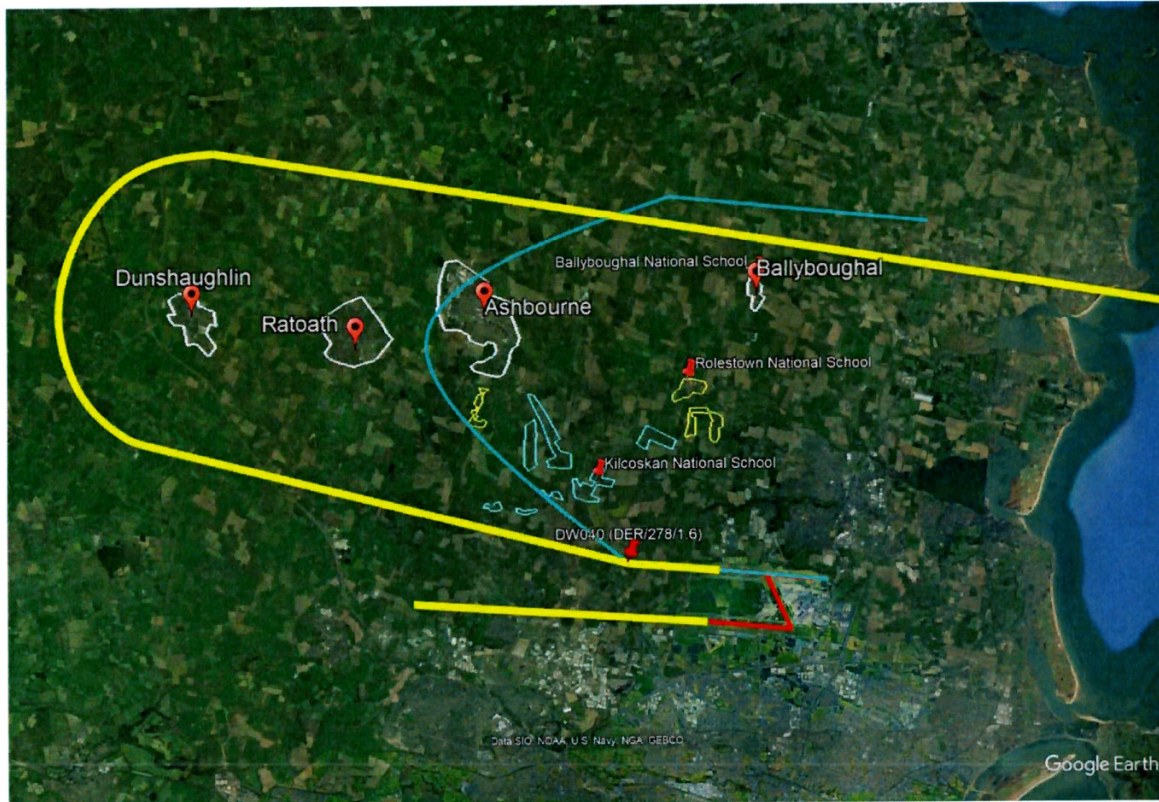


Figure 9 The proposed departure can co-exist with the present RWY28L departure and RWY28R missed approach

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.

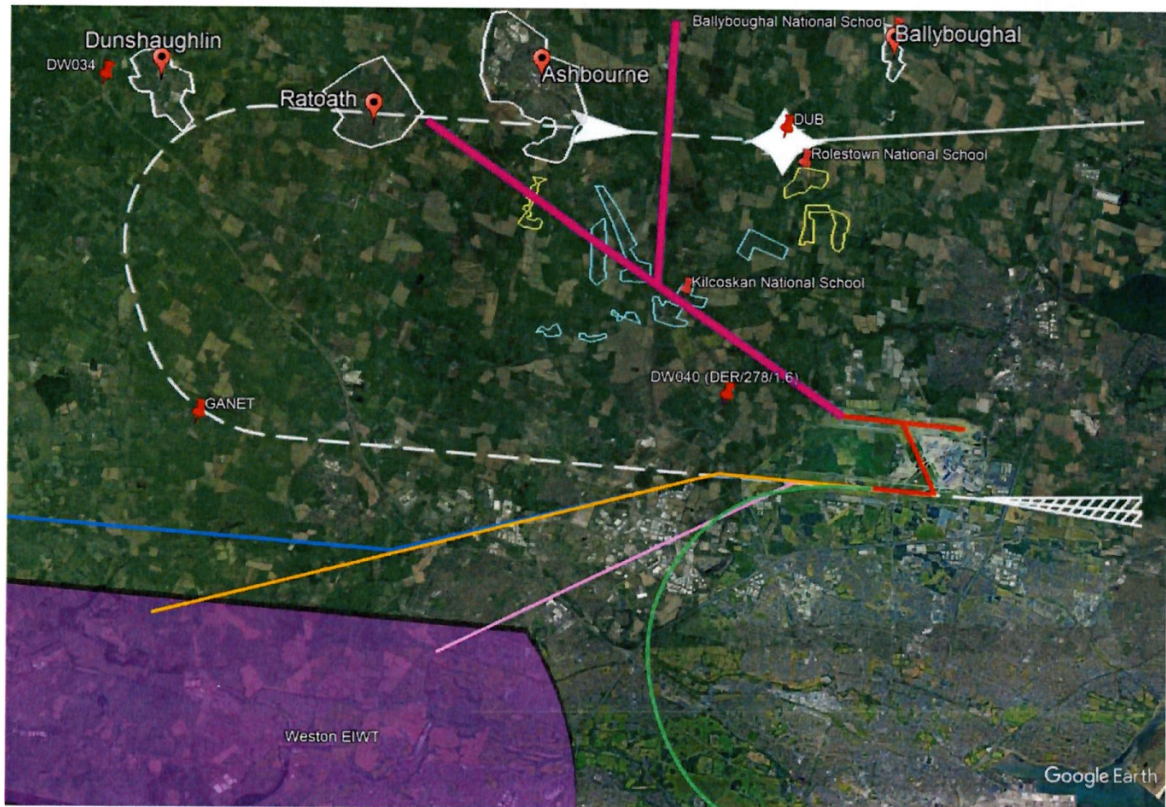


Figure 10 Multiple options for the RWY28L missed approach to deviate south are available – coloured lines. Weston's airspace stops at 2000ft. While the lines may appear to penetrate Weston's Area of Responsibility they actually overfly it.

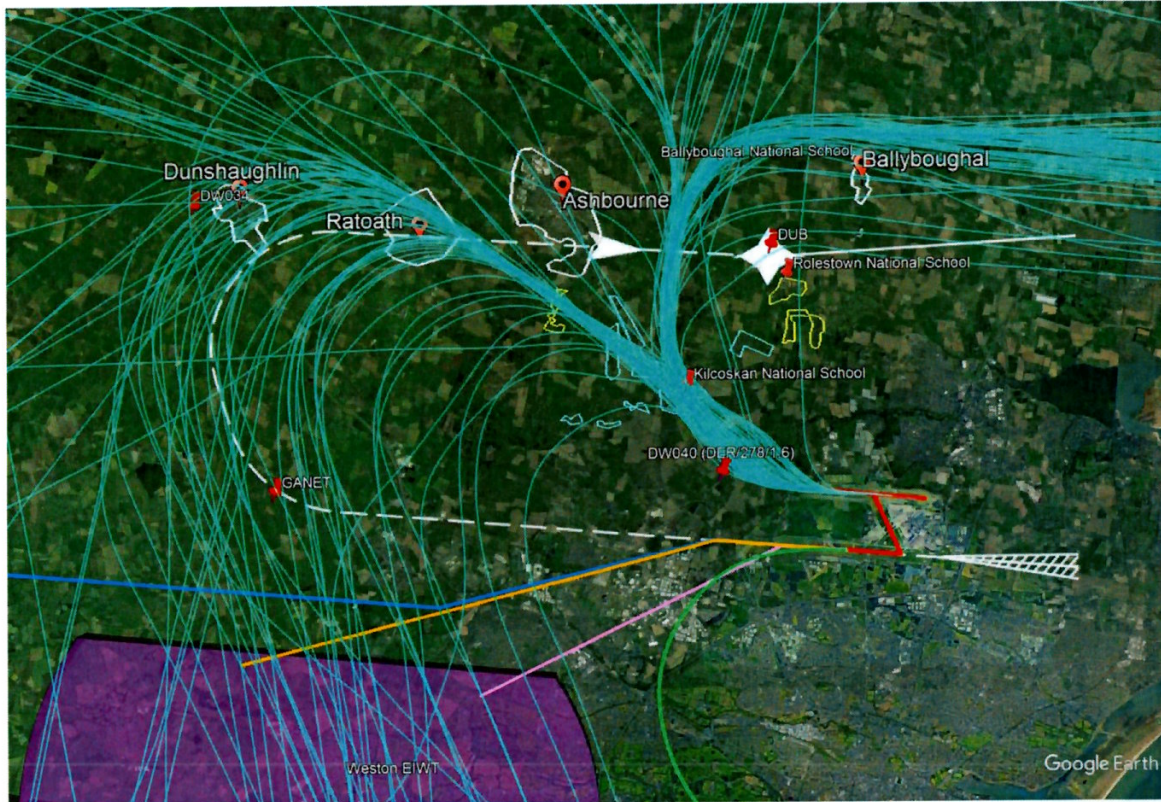


Figure 11 The unsafe existing RWY28L missed approach remains in operation despite being reported to IAA and daa.

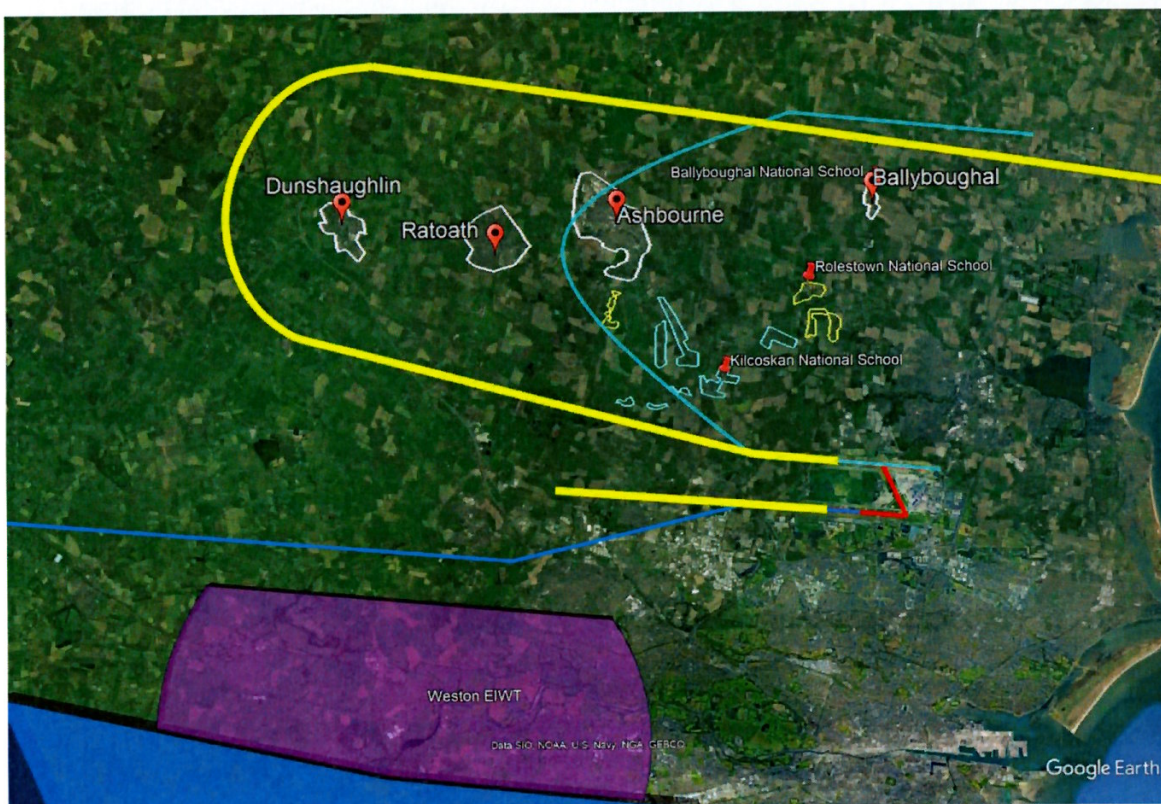


Figure 12 Proposed solution providing maximum capacity with lowest annoyance

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**

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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
- Boromhe

- 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

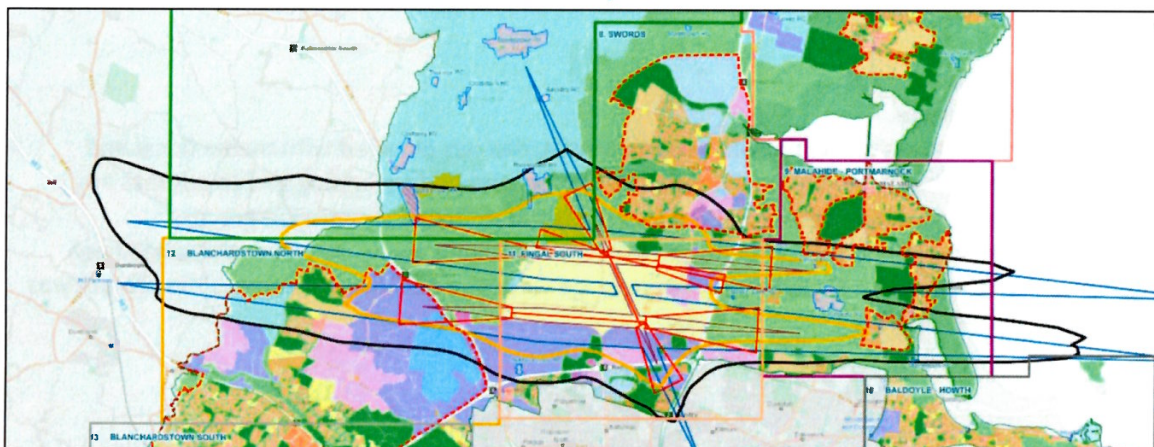


Figure 13 Fingal Development Plan 2017-2023

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.

Meath County Development plan

It is clear from the 2013-19 and 2021-27 plans and noise mapping that the intended flight plans and associated noise are not in keeping with current illegal paths both by day and by night.

While permissions for dwellings within these noise areas were requested to have additional noise insulation, and other remediation measures, at a huge additional cost, none of these dwellings are now being flown over....

DAA submission

(see link)

<https://consult.meath.ie/en/submission/mh-c5-826>

At no stage were DAA honest/open/transparent in their plans to change flight paths and no public consultation took place, this is direct contravention of the Aarhus Convention of which Ireland is a signee

The EU and its 27 Member States are all Parties to the [Aarhus Convention](#) – the [United Nations Economic Commission for Europe \(UNECE\) Convention](#) on access to information, public participation in decision-making and access to justice in environmental matters. It is the leading international agreement on environmental democracy. The Aarhus Convention protects every person's right to live in a healthy environment. It guarantees the public three key rights on environmental issues.

Access to information refers to the public's right to receive environmental information held by public authorities. This includes information on

- the state of the environment
- policies or measures affecting the environment
- public health and safety where these are affected by the state of the environment

Public participation refers to the public's right to participate in environmental decision-making. Public authorities are required to allow the general public and environmental NGOs to meaningfully participate in decision-making regarding projects affecting the environment and plans and programmes relating to the environment.

Access to justice refers to the public's right to review by a court or another independent body to ensure that public authorities respect the rights to access to information and public participation, and environmental law in general.

Red kite population – Ashbourne just one notable impact

It is my experience that the kite has disappeared over Ashbourne due to low flying aircraft. Kites are notorious for their gliding at heights of 200m to 800m and even higher. Ashbourne was a safe space for them and their whereabouts are now unknown unless this was documented previously, there is now no baseline should proper EIS take place. This is a direct consequence of the area being overflown and the absence of any proper study or detailed environmental impact assessment. What effect has this had on the food chain and local biodiversity?

There is evidence online where a Councillor Ian Carey.

https://www.facebook.com/iancareyGP/videos/two-red-kites-on-the-dublin-meath-border/471677524349318/?locale=ms_MY



Conclusion

DM POL 32:

- a. To require that single residential units (urban and rural) or extensions to same are provided with noise insulation of an appropriate standard having regard to its location within a Noise Zone B or Noise Zone C.
- b. To require non-residential noise sensitive uses or multiple residential developments within Noise B or Noise Zone C include where appropriate, a noise impact assessment which clearly demonstrates that relevant internal noise guidelines will be met in order to protect the amenity of future occupants.

DM OBJ 111: Development should be restricted which would give rise to conflicts with aircraft movements on environmental or safety grounds on lands in the vicinity of Dublin Airport and on the main flight paths serving Dublin Airport.

From: [Joe Bonner](#)
To: [Dara McGowan](#)
Subject: Submission to An Bord Pleanála Case Reference PLO6F.314485 Planning Ref. F20A/0668
Date: 08 December 2023 17:25:22
Attachments: [shield-advisory.png](#)
[chevron-light.png](#)
[shield-advisory.png](#)
[chevron-light.png](#)
[shield-advisory.png](#)
[chevron-light.png](#)

☐ External email ☐

☐ First time sender ☐

☐ Contains topics of a financial nature ☐

This email is potentially deceptive, as even though it is using a colleague's name it was sent from an external source, and therefore may not be genuine. Please be cautious, verbally verify with sender before taking any actions based on it and forward this mail to ithelpdesk@meathcoco.ie. This warning has been inserted by Topsec email filter.

Dara,

The following are the main points that are being presented to me from the communities affected by the unauthorised changes to the flight paths out of Dublin Airport and what they want included in the submission.

- 1 . They unanimous want an oral hearing.
2. Despite numerous complaints the DAA are ignoring them and doing nothing to alleviate the situation in fact the situation is getting worse.
3. The noise and air pollution are intolerable.
4. The planes are flying that low over some houses they are lighting up their rooms.
5. The houses are vibrating with the impact of the planes.
6. People cannot sleep at night and when they do get to sleep they are awoken by the noise.
7. There is documentary evidence of children having to go to bed with ear muffs on in order to get them to sleep.
8. The constant noise, vibrations and aircraft smell is affecting people's mental health . They are in breach of the WHO guideline.
9. People cannot open their windows.
10. People cannot use their gardens.
11. Their dogs even cower at the sound of the planes.
12. The DAA Are looking to retain unauthorised flight paths.
13. The DAA are looking to expand the capacity of the airport and this will make the situation worse.
14. There is no insulation scheme in place under the unauthorised flight paths.
15. The noise monitors are in the wrong place.
16. Air quality monitors are required under these flight paths on the Meath side of the runways.
17. The DAA will not meet the affected communities.
18. The communities feel under siege by the DAA and are at their wits end.
19. Many families are looking to move out of the area but their properties have been greatly devalued as a result of this unauthorised development.
20. They are afraid of what the future holds for them if the DAA get approval for their unauthorised flight paths and are allowed to intensify the traffic through the airport up to 40 million using these unauthorised flight paths.

Dara,

I also carried out an online survey re the Aircraft Noise and I'll give you a rough breakdown of the results they might be of assistance to you.

This survey stopped on 31/10/2023 and things have gotten worse since that.

The survey over had 250 participants 232 of which wanted to be update.

93% want to be kept updated.

Under the heading :

To what degree is the increased air traffic affecting your household .

6% none at all.

2% a little .

13% a moderate amount.

46% a lot.

33% unbearable .

(232) Responses

Responses generally from Ashbourne north and south of the Church ,Ratoath, Greenogue,Kilbride,Baltrasna,Wotton.

Hope Regis is of some help.

Regards,

Joe