Oireachtas Transport Committee

March 1st, 2023

St Margaret's The Ward Residents Committee FORUM

(Fingal Organised Residents United Movement)



Pearse Sutton – St Margaret's Resident

Chartered Engineer BSc(Eng), CEng, Dip Struct Eng, FIEI, FIStructE, MAPEGS, PEng, FConsEl, Dip Env Eng, Eur Ing, LEED AP

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Dr Niamh Maher – St Margaret's Resident MBBChBAO, DOWH, MRCPI, MRCOG

What's Happening

Pearse Sutton St Margaret's The Ward Residents Committee

FORUM (Fingal Organised Residents United Movement)

Why are we here today

daa not adhering to the strict environmental conditions attached to the planning permission of 2007

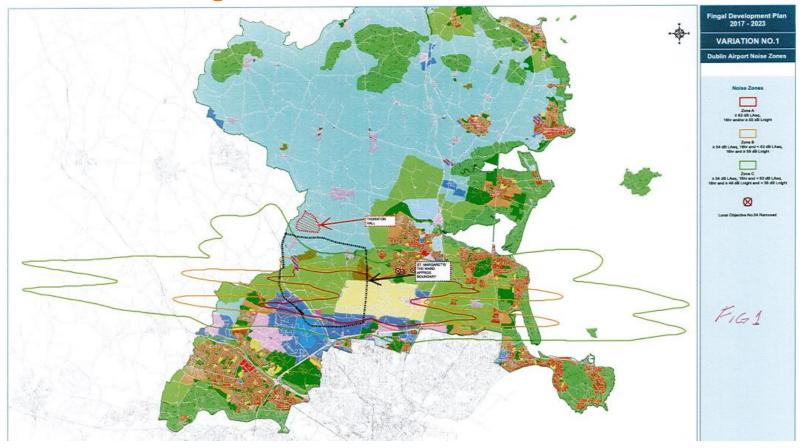
daa have told this committee they are operating the runway in accordance with the planning permission they have, that is not the case

As a result, daa are inflicting **Unnecessary**, **Unanticipated and Unacceptable** noise pollution on communities

Since February 23rd, the daa are operating new revised SIDs which also don't comply with the environmental conditions attached to their planning

The daa are refusing to engage with the local communities contrary to their press releases

Location of St Margaret's and The Ward



Location of St Margaret's and The Ward



Condition 1 of 2007 planning permission (ABP ref: PL 06F.217429)

CONDITIONS

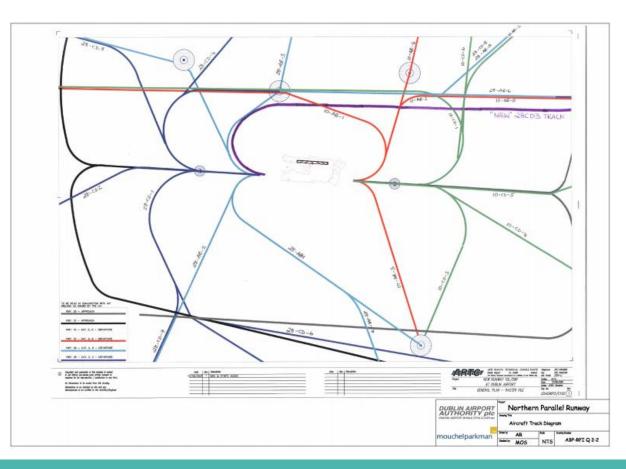
1. The development shall be carried out in accordance with the plans and particulars and the Environmental Impact Statement lodged with the application as amended by the further plans and particulars received by the planning authority on the 9th day of August, 2005, including the Environmental Impact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

An Bord Pleanála

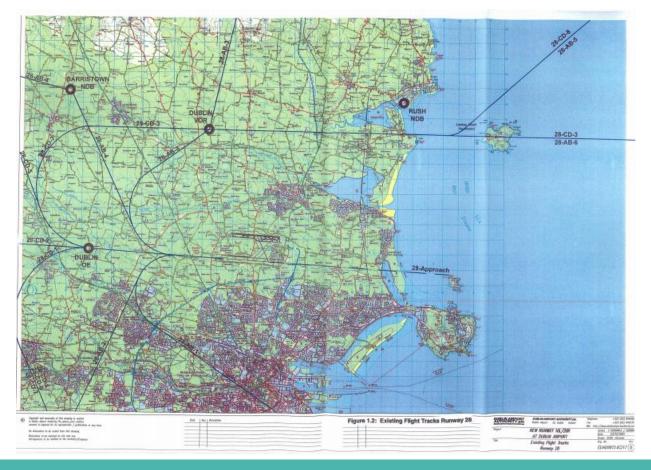


Reason: In the interest of clarity.

Flight tracks submitted as additional information to ABP



Flight tracks superimposed on a land map as submitted to ABP



Noise Abatement Procedures from AIP Ireland submitted to ABP*

• Noise Abatement Procedures issued by the IAA stating that all jets must go straight out for 5nm on Runway 28

DUBLIN AIRPORT AUTHORITY PIC

Appendix 1.1

Noise Abatement Procedures taken directly from AIP Ireland as issued by the Irish Aviation

- 3.2 Cat C, D Aircraft
 - 3.2.1 Departures aircraft from all runways except runway 10, must maintain straight ahead after take-off to 5NM before commencing turn, unless otherwise cleared by ATC above 3000 feet.
 - 3.2.2 Departures from Runway 10 must continue straight ahead to 5NM or 6NM ID, as appropriate to the SID, before commencing turn.
 - 3.2.3 Take-off climb shall comply with the recommendations for Aeroplane Operating Procedures -Take-off, Procedure A, detailed in Part 5, Chapter 3 of PANS-OPS ICAO Doc 8168, Volume 1, the principal provisions of which are as follows:

Noise Abatement Procedures from AIP Ireland submitted to ABP*

- Noise Abatement Procedures issued by the IAA detailing the environmental corridors that aircraft must adhere to for all runways
- The environmental corridors extend for 5nm or until the aircraft achieve 3000feet

8. Cat C and D aircraft using Runways 10, 28, 16 and 34 shall operate within environmental corridors which are based on runway take-off flight path areas. The corridors have a width of 180m at the departure end of the clearway, diverging at 12.5% on each side to a maximum width of 1800m, and extending in length to 5NM from the point of origin (6NM for Runway 10). The corridors extend vertically from surface to 3000FT AMSL. The corridors apply for departures from each runway and also for approaches to the reciprocal runway, except for circling approaches.

2016 Submission to FCC for compliance with Condition 7(Home Insulation)NewBDP.Consulting

Residential Noise Insulation Scheme

Condition 7

North Runway, daa

Document No. EDAD98015_09_050_003_B						
REV	DATE	Issued by	Signed	Description		
A	21.10.2016	Peter Kable	Joe Walsh	Issue for Review		
в	16/11/2016	Peter Kable	Joe Walsh	Revised per review note 006		
с						

Residential Noise Insulation scheme*

- Residential Noise Insulation scheme comprised of all dwellings inside the 2007 63dB contour and the revised 63dB contour based on later 2016 inputs
- Both sets of contours show clear alignment with straight out routes

The original 63dB contour published as part of the EIS in 2007 was based on a future year of 2025. The current updated 63dB contour was produced based on 2022 forecast for the opening year of the runway in accordance with Condition 7. Both 63dB contours are illustrated in the following figure which shows there are differences between the two.



63dB Contour produced for Condition 7 (based on 2022 forecast)
63dB Contour (2007, based on 2025 forecast)

Residential Noise Insulation scheme*

- Resultant combined 63dB contour approved for Residential Noise Insulation
- Contour shows clear alignment with straight out routes

RESIDENTIAL NOISE INSULATION SCHEME

The union of the 2007 63dB contour and the current forecast 63dB contour, will be used to determine eligibility for the scheme. This contour will be known as the combined 63dB contour. The combined contour is shown in the following figure.



 Modelling Report from Bickerdike Allen Partners (BAP) in 2016 used to generate the contours for the Schools Insulation Scheme, Voluntary Purchase Scheme and Residential Insulation Scheme Bickerdike Allen Partners Architecture Acoustics Technology

DUBLIN AIRPORT – NORTH RUNWAY OPTION 7B FORECAST CONTOURS CONDITIONS 6, 7 & 9

Report to

Martin Doherty Environmental Lead North Runway Project Dublin Airport Authority

A9843-R03-Rev3-NW 26 October 2016

 BAP modelling report clearly stating that the jets were modelled as flying straight out for 5nm before turning

2.4 Route Utilisation

As the proposed routes are still being developed with the IAA, those from the Dublin Airport optimization exercise undertaken in 2011 have been re-used. Flight routes for the existing runway were used and assumptions for future routes from the north runway were made based on available information.

Straight arrival routes have been assumed for all runways. For the crosswind runway, straight departure routes have also been assumed.

For the parallel runways, initial departure routes have been prepared based on the existing published routes for the south runway, with those for the north runway in effect replicating them. There are four initial departure routes for each runway end, heading approximately north, south, east and west.

For category A & B aircraft, the initial turns are modelled as occurring shortly after the end of the runway. For category C & D aircraft, the aircraft are modelled as flying straight for 5 nm before turning. These C & D routes have been supplemented for departures to the west by routes that turn earlier. This assumption arises from a previous study of radar data which found that approximately 75% of the category C & D aircraft on runway 28 actually perform

7

 Modelling Report from Bickerdike Allen Partners (BAP) referencing Fig A9843-R03-Rev3-02 depicting modelled departure routes overlaid on top of the noise contours their initial turn earlier than described by the SIDs. This is because they have reached an altitude of 3,000 ft or greater and are permitted to exit the environmental corridor at this altitude if cleared by Air Traffic Control. Two additional 'Early Turn' routes per runway were therefore created for large aircraft, one with an initial turn to the north which subsequently headed east, to the LIFFY beacon, and one with an initial turn to the south which remained heading south, to the NEPOD beacon.

For the parallel runways the departure route used by each aircraft in the forecast has been decided on the basis of its destination. The resulting route usage for each of the parallel runways is shown in Table 5 below.

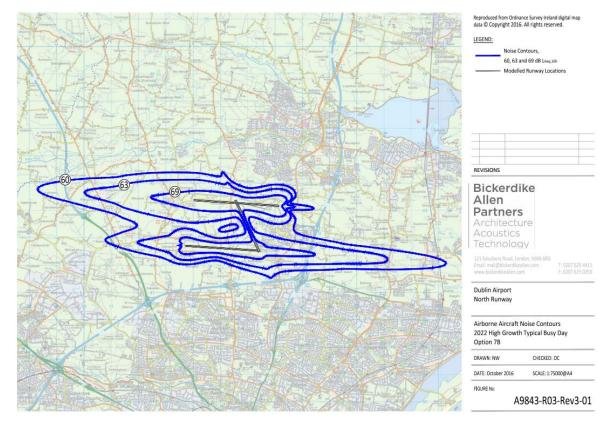
Route (Direction after initial turn)	Percentage
ERUDA (North)	12%
INKUR (West)	12%
LIFFY (East)	45%
NEPOD (South)	32%

Table 5: Departure Route Usage

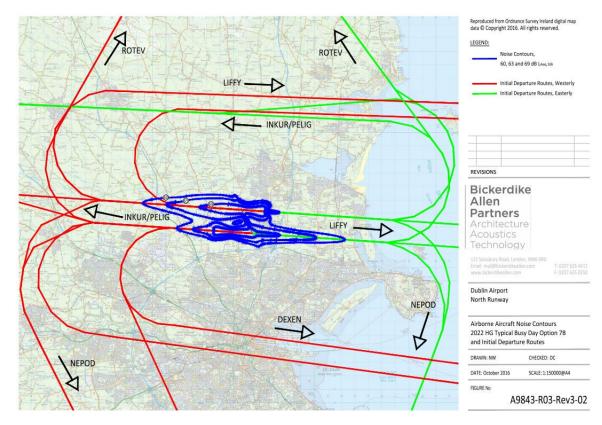
Figure A9843-R03-Rev3-02 shows the initial modelled departure routes for category C & D aircraft, overlaid on top of the noise contours. This clearly shows that the exact location of the routes has very little effect on the shape of the noise contours at the L_{Aeq} values shown.

Track dispersion was not used in this modelling exercise, with the exception of the "early turn" versions of some routes as described above. Including dispersion would have the effect of making the contours shorter and wider, however the effect on the noise contours would be very limited, in particular for those values presented in the previous report, as they do not extend a large distance from the airport.

 Contours for the Schools Insulation Scheme (60dB), Residential Noise Insulation Scheme (63dB) and Voluntary Purchase Scheme (69dB) from BAP Modelling Report clearly showing the alignment of the contours with straight out routes



 Contours for the Schools Insulation Scheme (60dB), Residential Noise Insulation Scheme (63dB) and Voluntary Purchase Scheme (69dB) from BAP Modelling Report overlaid with the straight out routes clearly showing their alignment



Inspector's report from 2007 stating ٠ that the daa's counsel Mr O'Donnell sconfirmed that the planning permission would have to be complied with and that the IAA were advised and satisfied with the proposal and had no objection to the planning permission.

A number of the appellants have raised the concerns regarding deviations from environmental corridors. While penalties are imposed for unauthorised deviations as noted, Air Traffic Control can direct or approve such deviation. Mr. O'Donnell confirmed that ATC controls movement of aircraft and is the supreme authority. He is of the opinion that the requirements of a planning permission would have to be complied with and it would be no defence to say ATC directed otherwise. He stated that the Irish Aviation Authority were advised of the proposal and were satisfied with the proposal. I note that the Irish Aviation Authority were advised of the planning application by the planning authority to which it stated it had no objection. Effectively the situation where ATC can authorise deviations from the environmental corridors, will continue, notwithstanding any restrictions which may be imposed in the planning process.

16.9.5 Day and Night Time Noise

The contours have two principal functions. One is to inform the decision making process associated with determining the present application, while the other is to determine entitlement to noise insulation or offers to buy properties both in the present and in the future. In terms of the decision making process the identification of significant effects is essential to allow for a proper assessment to be made.

16.9.5.1 Day Time Noise

As preferred Option 7B involves preferential use of the southern runway 10L for easterly departures and westerly arrivals, the principal effect of the proposed runway between 0700 and 2300 hours would be to the west of the proposed runway.

The most recent contours before the Board as received 08/03/07 show that the change in tolerance and refinement settings avoid the sharp pointed end to the contours referred to in the oral hearing and changes the detailed shape of the contours including a few more houses to the north but does not materially change the overall area within

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 Inspector's report from 2007 stating that they agree with ABP's Noise Consultant, that the daa provided no clear information to the Board about the 'significance' of noise at night

However notwithstanding Mr. Sharp's opinion as expressed at the oral hearing it is quite apparent from the noise contours that in the 2025 'with development' case and the 2025 'without development case' there is a forecast increase in noise at night even though the proposed runway would not be used at night. As such the cumulative impact of the proposal with use of the existing runways within the aerodrome is of particular relevance. The applicant was asked to address this matter in the section 132 notice issued by the Board following the oral hearing, in addition to quantifying the potential for increase in night flights on the existing runway which could derive from the growth of air traffic at the airport arising from the proposed runway and clarifying the statement made in paragraph 16.1.2.35 of the EIS which states that a system of assessing the increase in noise level would be used to assess night time noise impact. The notice also requested which category in the accompanying table to which significance should be attached. While the response did make clear that the number of night movements in the modelling period would increase from 45 to 65 in the constrained case (no runway) and from 49 to 95 in the unconstrained case (with runway) the applicant failed to identify the category to which significance should be attached. The applicant stated in response "that it is respectfully submitted that to provide an absolute figure attributable to 'significance' is not equally applicable in all circumstances having particular reference to the background noise". However no data has been provided on such background noise. I would therefore concur with Mr. Thornely-Taylor's opinion that the request has not been substantively or satisfactorily addressed and that, therefore, there is no clear information about the significance of noise at night available to the Board. This is further exacerbated by the fact that the applicant omitted to submit drawing no. ABP-RFI Q2d which would, most likely, have been the night-time 2025 Option 7b contour with 2nd runway, corresponding to Figure 58, Part 4 of the EIS.

 Inspector's report from 2007 stating that the information provided to the Board was materially deficient with respect to night-time noise and the effect of noise on the cognitive skills of children In my opinion it would be disingenuous to claim that an infrastructural project of the size proposed will not have a material impact. Notwithstanding the proposed mitigation measures to be introduced that the impact of the airport as a consequence of the 2nd parallel runway will be extended over a greater area and will impact on an increased population both in terms of those living in the vicinity of the airport and

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those under the proposed flight path with specific regard to noise, the increase in risk and the general impact on the amenities currently enjoyed Its actual physical impact on the environment would also be material.

In terms of public health and safety particular regard is had to the Public Safety Zones. Certainly the proposal will introduce an element of risk for the communities under the flight paths which heretofore did not exist.

The matter of noise is particularly problematic and despite the extent of information provided on the subject and the opportunities provided to the applicant to address certain issues I consider that the information before the Board remains materially deficient, namely with regard to the 'significant effects' in terms of night time noise and, in the light of increasing evidence of the correlation of aircraft noise and cognitive skills of children, the ability of schools to be insulated so as to provide the necessary indoor noise levels of 45dBA above which significant effects would occur.

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 Inspector's report from 2007 recommending that the North Runway planning be refused

In view of the importance of these issues and their potential material negative impacts on the affected communities and schools, in my opinion it is incumbent on the applicant to provide the necessary information in a format which is easily interpreted without recourse to conjecture or inference so as to allow the Board to make a proper assessment. The repeated failure by the applicant to provide this information has to be considered fatal at this stage and I do not consider it possible that a reasonable expectation in terms of the extent of the impacts in terms of noise can be made on which the Board can realistically make an informed decision.

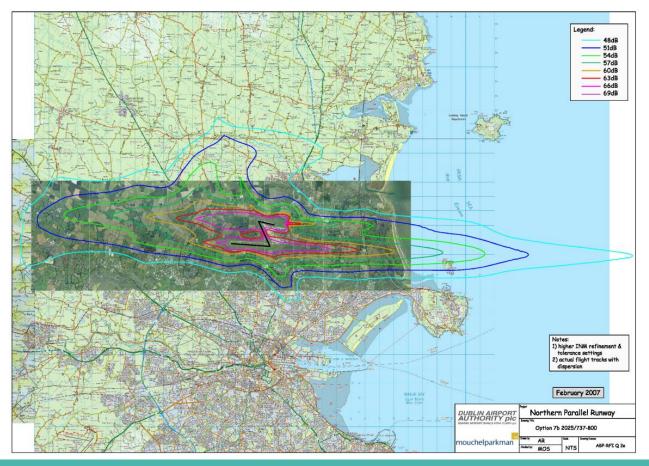
As I have acknowledged above the proposal accords with national, regional and local policy and its strategic importance is accepted. I would suggest, however, that the advancement of the scheme would effectively require a section of the population to accept the impacts and inconvenience arising for the benefit of the wider community. In the interests of fairness and transparency I would suggest that a positive decision in this instance, should it be predicated on such reasons, should only be countenanced where the full facts as to nature and extent of the potential impacts are available and detailed so that the Board and all persons who are thus affected are cognisant of the potential ramifications. This is not the case in this instance and I do not consider that the material deficiencies which remain could be addressed, in any manner, by way of condition. I therefore recommend that permission for the above described development be refused for the following reasons and considerations.

 Inspector's report from 2007 outlining the reasons for recommending a refusal of the North Runway planning

REASONS AND CONSIDERATIONS

- 1. It is considered that the proposed northern parallel runway, taken in conjunction with the existing southern runway 10R/28L and cross-wind runway 16/34, would result in a material extension in the geographical area and population that would be affected by Dublin Airport in terms of noise and public health and safety risk. These impacts are considered material. The impacts relating to noise would be only partially offset by the proposed mitigation measures in terms of the insulation and buy-out schemes. It is therefore considered that the altered noise environment and increase in aircraft noise both during the day and at night which would arise as a consequence of the proposed development, coupled with the increased risk in terms of public health and safety would, seriously injure the amenities of property and community facilities within the affected areas and would be contrary to the proper planning and sustainable development of the area.
- 2. Having regard to the correlation between aircraft noise and the development of childrens' cognitive skills the Board is not satisfied on the basis of the submissions made in connection with the planning application and the appeal that the proposed mitigation measures in terms of insulation of schools which would be affected by the proposal would be adequate to ensure a maximum internal classroom noise level of 45dBA LAeq. In the absence of this information it is considered that the proposal would endanger the health and safety of persons attending the said schools and would be contrary to the proper planning and sustainable development of the area.
- 3. Having regard to the proposed increase in night time flights on the existing southern parallel runway which would be facilitated by the proposed northern parallel runway the Board is not satisfied, on the basis of the submissions made in connection with the planning application and appeal, that either the full nature and extent of the increase in night time noise, the significant effects which may arise from same or the extent of the areas and populations which would be affected by same have been satisfactorily identified and quantified. It is considered that the proposal, therefore, fails to comply with the requirements of Schedule 6 of the Planning and Development Regulations 2001 which sets out the information to be information to be contained in an Environmental Impact Statement including a description of the likely significant effects.

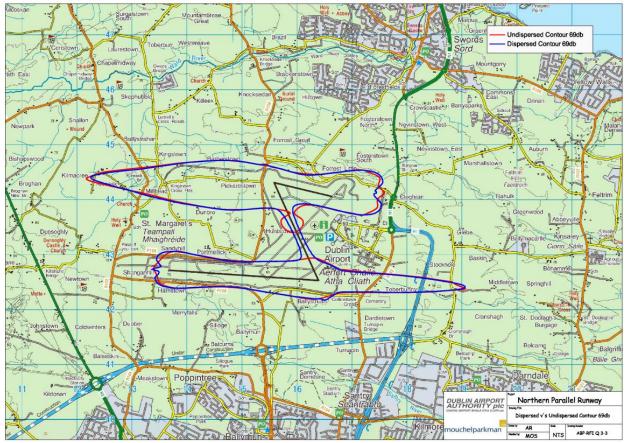
Option 7b contours submitted to ABP as additional information



63dB contour submitted to ABP as additional information



69dB contour submitted to ABP as additional information



ABP decision to overturn Inspector's recommendation*

 ABP report from 2007 outlining their decision to approve the planning for the North Runway on the basis of the information provided and the strict environmental conditions they attached In deciding not to accept the Inspector's recommendation to refuse permission, the Board considered that sufficient information had been submitted in the Environmental Impact Statement, in further information submitted both to the planning authority and the Board and at the oral hearing to enable it to make an assessment of the significant impacts of the proposed development on the environment and its acceptability in terms of proper planning and sustainable development. The Board considered that in overall terms, the inconsistencies or deficiencies in information referred to by the Inspector were not so significant as to warrant a refusal of permission and could be addressed by way of condition. In particular, the Board was satisfied, on the basis of the information submitted and the conditions attached, and, having regard to the fact that there are no planning restrictions on the current operation of the airport runways, that -

- (1) there would be no significant deterioration in noise conditions at night time in the vicinity of the airport due to the proposed Option 7b operating mode for the runways (non-use of new runway and of cross runway at night) and the restriction on night time aircraft movements by way of condition,
- (2) in relation to day time noise, there would be some improvements relative to current or future noise impacts with the existing runway system to be offset against disimprovements in other areas/respects and the net effects would not be significant in terms of public health and safety such as to warrant a refusal of permission,
- (3) in relation to schools affected (including pre-school facilities), the mitigation measures proposed, reinforced by conditions and monitoring would ensure that a suitable noise environment can be maintained within classrooms and school buildings generally.

In coming to the above decision, the Board noted that, in addition to planning controls, Dublin Airport would in the future be subject to the new noise control regime introduced under the EU Environmental Noise Directive 2002/49/EC and the Environmental Noise Regulations, 2006.

Planning conditions imposed by ABP*

CONDITIONS

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

Reason: In the interest of clarity.

5. On completion of construction of the runway hereby permitted, the average number of night 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.

- 3. On completion of construction of the runway hereby permitted, the runways at the airport shall be operated in accordance with the mode of operation Option 7b as detailed in the Environmental Impact Statement Addendum, Section 16 as received by the planning authority on the 9th day of August, 2005 and shall provide that -
 - (a) the parallel runways (10R-28L and 10L-28R) shall be used in preference to the cross runway, 16-34,
 - (b) when winds are westerly, Runway 28L shall be preferred for arriving aircraft. Either Runway 28L or 28R shall be used for departing aircraft as determined by air traffic control,
 - (c) when winds are easterly, either Runway 10L or 10R as determined by air traffic control shall be preferred for arriving aircraft. Runway 10R shall be preferred for departing aircraft, and
 - (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.

Reason: In the interest of clarity and to ensure the operation of the runways in accordance with the mitigation measures set out in the Environmental Impact Statement in the interest of the protection of the amenities of the surrounding area.

Planning conditions imposed by ABP*

6. Prior to commencement of development, a scheme for the voluntary noise insulation of schools shall be submitted to and agreed in writing by the planning authority (in consultation with the Department of Education and Science). The scheme shall include all schools and registered pre-schools predicted to fall within the contour of 60 dB LAeq 16 hours within twelve months of the planned opening of the runway to use and, in any event, shall include Saint Margaret's School, Portmarnock Community School, Saint Nicholas of Myra, River Meade and Malahide Road schools. The scheme shall be designed and provided so as to ensure that maximum noise limits within the classrooms and school buildings generally shall not exceed 45 dB LAeq 8 hours (a typical school day). A system monitoring the effectiveness of the operation of the scheme for each school shall be made available to the public by the planning authority.

Reason: To protect the amenities of schools in the area.

7. Prior to commencement of development, a scheme for the voluntary noise insulation of existing dwellings shall be submitted to and agreed in writing by the planning authority. The scheme shall include all dwellings predicted to fall within the contour of 63 dB LAeq 16 hours within 12 months of the planned opening of the runway for use. The scheme shall include for a review every two years of the dwellings eligible for insulation.

Reason: In the interest of residential amenity.

9. Prior to commencement of development, a scheme for the voluntary purchase of dwellings shall be submitted to and agreed in writing by the planning authority. The scheme shall include all dwellings predicted to fall within the contour of 69 dB LAeq 16 hours within twelve months of the planned opening of the runway for use. Prior to the commencement of operation of the runway, an offer of purchase in accordance with the agreed scheme shall have been made to all dwellings coming within the scope of the scheme and such offer shall remain open for a period of 12 months from the commencement of use of the runway.

Reason: In the interest of residential amenity.

10. Noise and flight track monitoring shall be operated at all times as detailed in the Environmental Impact Statement Addendum received by the planning authority on the 9th day of August, 2005 and in accordance with the recommendations of ECAC.CEAC.Doc 29. An annual report on noise contours shall be submitted to the planning authority. A noise and flight track monitoring report shall be submitted to the planning authority on a quarterly basis and shall be made available for public inspection. The results of the noise and flight track monitoring shall be used to re-evaluate noise impacts and the application of mitigation measures, including (a) the noise insulation scheme (including residences and schools) and (b) the property buy-out scheme, biannually.

Reason: To protect the amenities of the area and to ensure ongoing monitoring and verification of the proposed noise mitigation measures.

Planning conditions imposed by ABP*

28. A Community Liaison Group shall be established, involving representation of the Saint Margaret's Community, Fingal County Council and the Dublin Airport Authority. The composition of the committee and any variation thereof shall be subject to the prior agreement of the planning authority. The committee shall facilitate consultation with the existing community in accordance with the policies and objectives of the Fingal County Development Plan, 2005-2011 in relation to Saint Margaret's.

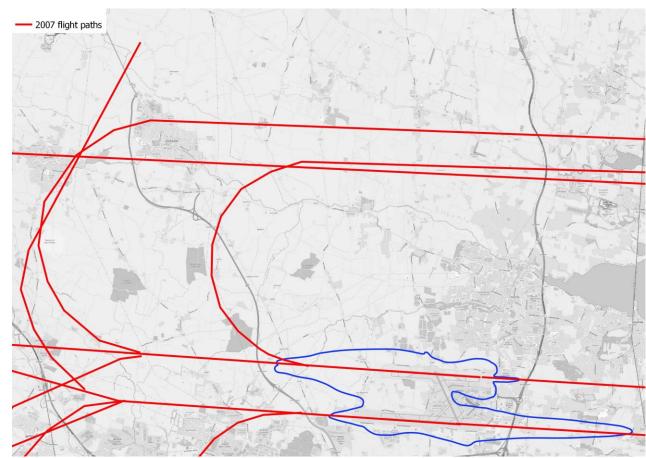
Reason: To provide for ongoing communication, dissemination of information and consultation with the local community affected by the proposed runway.

24. The developer shall comply in full with the proposals submitted for ecological compensation habitats, that is, three hectares for landscape and eight hectares for ecological compensation. In addition, the applicant shall sponsor a study into the coverage and condition of hedgerows in Fingal and, as part of mitigation measures, shall make a financial contribution towards the survey/restoration of the historic formal gardens in the Ward River Valley Regional Park. Prior to commencement of development, the applicant shall submit to the planning authority for written agreement a detailed work specification, establishment programme, an ongoing maintenance programme and implementation timescale.

Reason: In the interest of the proper planning and sustainable development of the area.

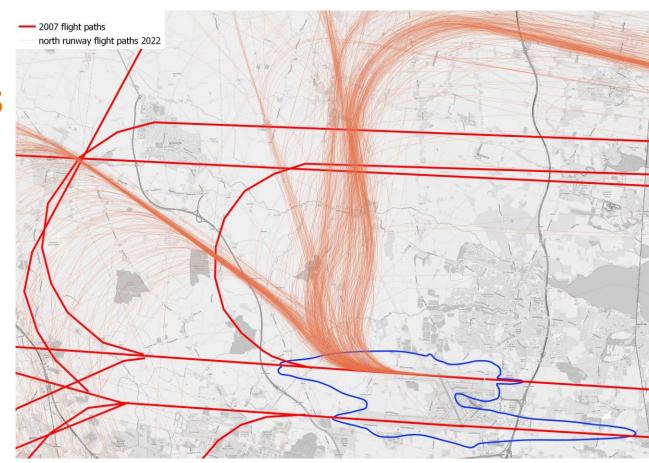
2007 Flight Paths

- Red lines show flight paths
- Blue line is the noise insulation scheme boundary 63dB



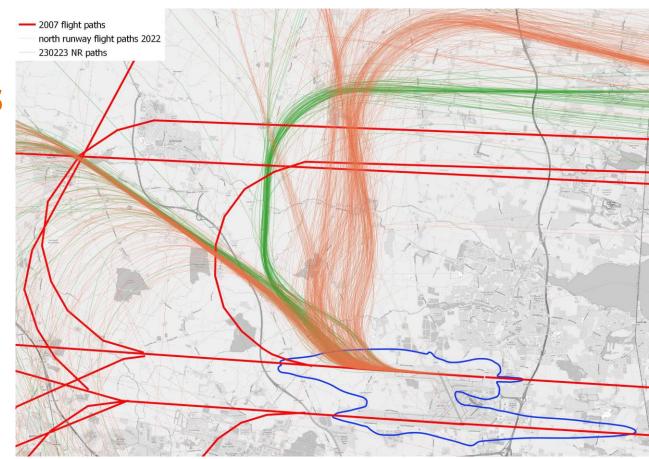
North Runway 2022 Flight Paths

- Red lines show flight paths
- Orange lines are actual flights in 2022
- Blue line is the noise insulation scheme boundary – 63dB



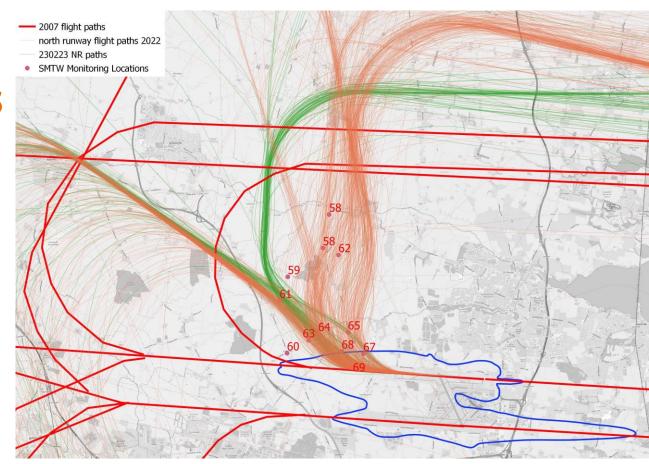
North Runway 2023 Flight Paths

- Red lines show flight paths
- Orange lines are actual flights in 2022
- Green lines are new SID in Feb 2023
- Blue line is the noise insulation scheme boundary
 - 63dB



North Runway 2023 Flight Paths

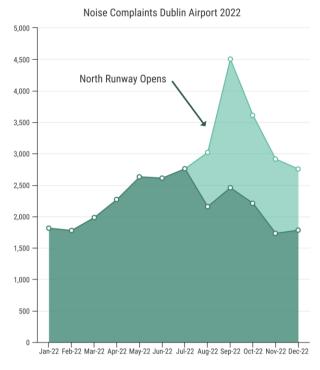
- Red lines show flight paths
- Orange lines are actual flights in 2022
- Green lines are new SID in Feb 2023
- Blue line is the noise insulation scheme boundary – 63dB
- Actual measured noise levels are presented for comparison



Noise Complaints

- North Runway related complaints have been ignored by daa
- ANCA do not accept noise complaints, Fingal do not accept noise complaints, EPA do not accept noise complaints.
- Only daa accept complaints, and then they are ignored.
- Residents have noted to daa that we consider every single flight from the north runway to be a complaint

DAA have released monthly noise monitoring reports for the full 2022 period. Noise complaints relating to North Runway have been excluded. DAA have not responded to a single noise complaint relating to the North Runway since it has opened for use in August 2022.



Actual Complaints
DAA Reported Figures

Site Notice Relevant Action application

FINGAL COUNTY COUNCIL

18-12-2020F 20A/0608 FINGAL COCO PL DEPT

daa pic intends to apply for parmission for a proposed development comprising the taking of a 'relevant action' only within the messing of actions 346 of the Planning and Development Act 2000, as amended, at Ouleh Arport, Co. Duble, in the townlands of Cathistow, Toberboney, Commons, Cathallis, Contailis, Contailis, Contralis, Contailis, Contailis, Contailis, Partentieut, Harmatown, Shangashili, Swednikh Hunstteinen, Fricardstein, Dublen, Mihmad, Rangtson, Alebertsoney, Forman Cathallis, Cathallis, Costailis, Contailis, Co

The proposed relevant action voltate to the right sine used of the rankey spacem at Dahlan Arport. It involves the amendment of the constraint prestriction set on to confine no. 31(4) and the registration of the portation set of the right sine values of the relevant human y familie previous of registrations. Council Fig. Lett. No 16(4): 73(5), 88 meV is a value 213429 at an enable by Figure Council F13(A0021, AP HeI, No. ARE 302329-19), as well as propsing new roles metgations measures. Conflictions no. 34(4) and 5 have ont yet come into effect or operation, on the constructions of the Hardin Human y Council Premission in company.

The proposal relevant action, if permitted, would be to remove the numerical cap on the number of Hights primited between the hours of 1 Jinn and 2 and duly that is due to come into affect in accordance with the Nerth Hiurwig Planming Permission and to replace E with an annual right due no come apoda between the hours of 11 Jipn and 2 and due to call be fights to take off film and/or kind on the Horth Hiurwig Hourway 10.1 288 (for an additional 2 hours, is 2000 tho 12 collows and 6000 hers to 0700 her. Overall, the world affect for an increase in the number of Hights taking off and/or bindings E built in Append between \$200 key and 0100 hers ower and above the number stipulated in conditions mis 5 of the Horth Hiurwig Planming Permission, in association with the samal right term nose repeats.

The relevant action pursuant to Section 34C (1) (a) is:

To amend condition no. Jijdi of the North Rumway Planning Permasion (Fingal County Council Reg. Ref. No. 104A/1755, ABP Ref. No. 7EDBF-217429 as amended by Fingal County Council F194/3023, ABP Ref. No. ABP-305289-19). Condition 31(d) and the exceptions at the end of Condition 3 state the following:

'3(d). Runway 10x-28R shall not be used for take-off or landing between 2300 hours and 0700 hours.

except in cases of sofety, maintenance considerations, exceptional or traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies are after across."

Permission is being sought to amend the above condition so that it reads:

Runway 201-288 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, advorse weather, technical faults in air traffic control yatems or declared emergencies or attee accords or where flutness IOX-288 length is required for a specific aircraft type."

The net effect of the proposed change, # permitted, would change the normal operating hours of the North Runway from the 0700hrs to 2000 hrs to 8000 hrs to 0000 hrs

The relevant action also is:

To replace condition no. 5 of the North Rumway Planning Permission (Fingal County Council Reg. Ref. No. F04A/1755), ABP Ref. No.: PU06F.217429 as amended by Tingal County Council F19A/2023, ABP Ref. No. ABP-305289-19) which provides as follows:

- 5: On completion of construction of the runway hereby permitted, the average number of hight time aircraft movements at the aspect shall not exceed 65/hight (between 3200 points and 7020 hours) when measured over the 92 day made/ling period as set out in the reply to the further information request received by A ensemble measured on the "15 and 16 and 16
- Reason: To control the frequency of right flights at the airport so as to protect residential amenity having regard to the information submitted concerning future right time use of the existing parallel numers."

With the following:

A nonse quata system is proposed for right time noise at the airpart. The airpart shall be subject to an annual noise quata of 7990 between the hours of 2330hrs and 0600hrs.

In addition to the proposed right time noise quota, the relevant action also proposes the following noise mitigation measures:

- A nose insulation grant scheme for eligible dwellings within specific right 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 (Bublin Airport) Regulation Act 2019.

The proposed relevant action does not seek any amendment of conditions of the North Rumany Planning Permission governing the general operation of the numary system (i.e., conditions which are not seek any any amendment of conditions to 1 (a). (b), (b), (b), (b) and 4 of the North Rumany Planning Permission (or any amendment of permitted annual parserger capacity of the Terminal 2 totalin Apport, conditions to 3 (b). (b), (b), (b) and 4 of the North Rumany Planning Permission (or any amendment of permitted annual parserger capacity of the Terminal 2 totalin Apport, condition to 3 of the Terminal 2 Planning Permission (Frag Zeolary) and condition to 2 of the Terminal 2 Interview Planning Permission (Frag) County Council Reg. Ref. No. 1004/1863; ABP Ref. No. 1004

The planning application will be subject to an assessment by the Aircraft Noise Compatient Authority in accordance with the Aircraft Noise (Dublin Airport) Regulations Act 2019 and Regulation (EU) No 599/2014. The planning application is accompanied by information provided for the purposes of such assessment.

As 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 few of event environment in earsonable cost of maining a cost, at the efficient of the filling Autory United State State State State Accessment Report may be inspected regist Casary Causel, Filipal Courny Isalt, Man Streep, Sweeth, Fingal, Cao, Duble. A submission or observation in relation to the Application and State State Management Ascherory on groupment of a fee of Cao, Which the period OF sveets, beginning on the date of reveals the Fingal Caurny Causel of the Application, and Out submissions or observations will be considered by the Planning Authority in making a decision on the application. The Finaming Authority may grant permission subject to or without conditions, or may refuse to grant permission.



Site Notice Relevant Action application

• Notice states the Relevant Action only relates to night-time use and erroneously neglects all impacts of day-time operations

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.

 Notice states that the Relevant Action does not seek to change any conditions of the North Runway's planning permission which are not specific to night-time use but this is clearly not the case with the flight paths

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.

Aircraft Noise Competent Authority*

- Declined residents' requests to have the Noise situation at the airport assessed when ANCA was initially established
- Initiated a noise assessment when the daa lodged an application to increase passenger numbers from 32->35m, but stopped the assessment when the daa dropped their application
- Declined to continue the assessment following residents' requests
- Only initiated an assessment when the daa submitted their night-time application
- Declined to assess the noise situation from the North Runway after numerous requests from residents
- Initiated a review on Dec 21st

Aircraft Noise Competent Authority

• Section 21 of the Aircraft Noise Act

Monitoring by competent authority

- 21. (1) The competent authority shall monitor-
 - (a) compliance with noise mitigation measures and operating restrictions, and
 - (b) the introduction of operating restrictions.
 - (2) Subject to *subsections (3)* and *(4)*, the competent authority shall, on or before each anniversary of the date of commencement of this section, review the effectiveness of the noise mitigation measures and operating restrictions (if any) on achieving the noise abatement objective.
 - (3) (a) The airport authority, or a person upon whom there is a noise impact from the airport, may, by notice in writing given to the competent authority, request the competent authority to review the effectiveness of the noise mitigation measures and operating restrictions (if any) on achieving the noise abatement objective.
 - (b) The competent authority shall, as soon as is practicable after it receives a request under paragraph (a), respond in writing to the requester.

(c) The competent authority may, at its discretion, comply with a request under *paragraph (a)*

(4) Where the competent authority is of the opinion, following a review referred to in *subsection (2)* or *(3)*, that the noise abatement objective is not being achieved, it shall take such action, whether under the Aircraft Noise Regulation or this Act, or both, as it is of the opinion will be effective towards achieving that objective.

Option 7b introduced by the daa during Oral Hearing



2007 planning permission vs Night-time planning application

Relevant Action (Night-time) planning application

- 1. Amend the hours of operation of the North Runway from 07:00-23:00 to 06:00-24:00
- 2. Replace the 65 night-time flight limit with a Noise Quota Scheme
- 3. Additionally, they want to:
 - a) Use divergent flight paths
 - b) Simultaneous departures on both runways 06:00-08:00

This permission was appealed to An Bord Pleanála and therefore

NOT Approved

ENGAGEMENT WITH • DAA • IAA ANCA

Oireachtas Transport Committee meeting

I thank Ms Gubbins Deputy < Darren O'Rourke

<

Acting Chairman (Senator Gerry Horkan)

For my own benefit, can I just confirm that the DAA is operating the north runway on the basis of the existing planning permission as opposed to what the DAA would like the planning permission to be into the future? Yes.



Mr. Kenny Jacobs

Ms Catherine Gubbins

I will ask Ms Gubbins to provide more detail in a moment but we are very < keenly aware of the issues related to the flight paths. Immediately when we found out about this we engaged with the regulatory bodies involved and with the local communities, which is something we do on a regular basis. Regarding the north runway, over the past year we have engaged with the local community 41 times. We take this very seriously and it will change, as the Deputy has said, on 23 February. Ms Gubbins will now give more detail on that.

Again, I want to acknowledge that it was a very unexpected development < once the north runway went operational on 22 August. We started to engage with both the regulatory authorities and our neighbours immediately we became aware of this issue. To provide some context, the determination of a flight path off a new runway is an incredibly complex and highly regulated process. Back in 2016 we would have engaged with the various regulatory authorities when we were trying to do our modelling around understanding the potential impact of the new runway on our neighbours. At that point in time we would have had an understanding that the interpretation of the International Civil Aviation Organization, ICAO, safety direction would have resulted in aircraft having to fly one nautical mile after take-off and then banking right. All of our modelling, as we engaged with regulators at that time, was based on that.

DAA letter to IAA on Sep 7th

From: Sent: To: Subject:

Wednesday 7 September 2022 18:54 Runway 28R SID

As previously discussed I am writing to you to request a meeting at your earliest convenience to discuss the current SID for Runway 28R operations.

From my limited understanding, I believe collaborative engagement between daa and IAA ANSP a number of years ago resulted in a set of assumptions being developed for noise modelling purposes. IAA ANSP kindly provided technical information to daa to assist our consultant complete noise modelling aligned to these assumptions. It was made clear that this was indicative data only and no formal SIDs had been designed at that stage.

daa used the output of this modelling in the Relevant Action application as well as modelling information provided to Fingal County Council for the Fingal County Development Plan and Local Area Plan for land-use planning noise zones. The material was also used in public consultations regarding North Runway.

While I understand no instruction was given to IAA ANSP to design the SID aligned to this modelling, I'm sure you can understand that it now causes us a challenge that a significant number of aircraft are overflying areas not indicated in the Relevant Action application or communications material issued publicly.

We would like to engage with you and your team in collaborative manner to assess what options might be available and in what time period to allow for a closer correlation between modelled aircraft tracks and actual tracks.

You might let me know what options you have over the coming days so that we can try and agree a time for this initial meeting?

Regards



Deputy Managing Director, Dublin Airport

While I understand no instruction was given to IAA ANSP to design the SID aligned to this modelling, I'm sure you can understand that it now causes us a challenge that a significant number of aircraft are overflying areas not indicated in the Relevant Action application or communications material issued publicly.

IAA letter to Transport Committee on Feb 10th

Irish Aviation Authority The Times Building 11-12 D'Olier Street Dublin 2, D02 T449. Iceland

Udarás Eitliochta na hÉireann T: +353 1 603 1552 Foirgneamh na hAmanna F: +353 1 670 9308 11-12 Sråid D'Oller www.iaa.ie Balle Átha Cliath 2, D02 T449.

Peter Kearney Chief Executive

Príomhfheidhmeannach

Éire

10th February 2023

Joint Committee on Transport and Communications Leinster House Dublin 2 D02 XR20

Ref: JCTC-i-957 By email: ictc@oireachtas.ie

RE: IAA ANSP invite to the Oireachtas Joint Committee on Transport and Communications

Dear Committee Chairman,

I refer to the above and the invite I received to attend the meeting of the Committee on Wednesday 1st March 2023.

In circumstances where I understand that neither the Dublin Airport Authority (daa) nor the Aircraft Noise Competent Authority (ANCA) are attending the Committee meeting, it is not appropriate for IAA ANSP to be represented. I have set out the reasons below.

IAA ANSP does not hold direct responsibility for the key matter on which the Committee seeks to be addressed, namely, noise related matters arising from the New Runway at Dublin Airport. From an IAA ANSP perspective, the Standard Instrument Departures (SIDS) of aircraft are relevant in the context of the safe and efficient management of aircraft operating to and from Dublin Airport. The development of these SIDs is a daa responsibility, and the IAA's input is based on daa instruction. Also, ANCA, as you will be aware is responsible for the regulation of noise at the airport; IAA ANSP does not hold responsibility in this area nor any competency to comment on noise regulation.

IAA ANSP's involvement is set out here: The IAA ANSP role is that of performing on the SIDS that are in place. We also provide specialist and technical support in their drafting to ensure their practical application is compliant with International Civil Aviation Organisation standards in a wider air navigation and air traffic management perspective. As already stated, our input is based on the daa's instruction. As such, our involvement in SID development is ancillary to the daa's role. Therefore, in the absence of daa and ANCA, our contribution to the Committee's considerations and further understanding of the related issues is likely to be limited.

My attendance at the Committee, particularly in the absence of the daa, could potentially misrepresent and blur the areas of responsibility between IAA ANSP and daa on this matter. I am concerned that my attendance, without representation of the other relevant State agencies, would potentially be a point of frustration for Committee members, as responses, central to what I understand are the Committees concerns, will not be ascertainable. I believe that without the benefit of having the daa and ANCA present, to provide explanations and outline their position, IAA

ANSP's input to the Committee will be without the relevant context or background. Therefore, in such circumstances. I do not believe that it is appropriate for IAA ANSP to attend without both the daa and ANCA.

I trust the above outlines the IAA ANSP's position. As stated, IAA ANSP is available to attend future Committee meetings on the issue, should the attendance of the principle State agencies also be confirmed.

Yours sincerely.

Peter Kearney Chief Executive Irish Aviation Authority

Aircraft Noise and Health Implications of chronic aircraft noise exposure and increased night time flights Dr Niamh Maher St Margarets The Ward Residents Committee

Health Impact

- Chronic exposure to aircraft noise has a well documented adverse effect on health
 - Nature of aircraft noise Vs road traffic Vs Trains

 WHO (2018) recommends average night time levels < 40db and daytime < 45db

Diabetes & Stroke

- Chronic exposure, stress, increased baseline BP, decreased leptin-obesity, Diabetes
- Sudden BP asleep, plaque rupture, bp can rise without being consciously aware, risk of MI and Stroke increases

Sleep deprivation

- Sleep deprivation can include 'awakenings' and 'arousals'
- Nocturnal aircraft noise can induce awakenings as low as 48db and arousals as low as 33db (Halperin et al, 2014)
- Our hearing does not 'switch off' because we are asleep
- Slow wave sleep, start, 90mins, NB for sleep quality and restoration, potentially affected with extended runway use

Child Health Impacts from Night and Day Exposure

- Effects of aircraft noise and sleep deprivation on children
 - RANCH study...children's cognition and health
 - Reading and recognition memory
 - Behavioural development, depression and anxiety

What will protect our health?

WHO states that **average noise levels above 45 db daytime and 40 db nighttime** will have **an adverse effect on our health** and mitigation measures should be implemented to ensure these

DAA in their challenge to material alterations to the draft Fingal development plan 2023-2029, state that this suggestion of a 40 db night time limit is

"inappropriate, disproportionate, predicated on a lack of objective data."

REALLY??

Night Time Flight Changes - Conditions 3(d) and 5 of planning permission

Planning permission for the runway was granted in 2007, on basis these conditions were in place to protect the community.

• <u>Now the DAA want to introduce a noise quota system and remove the</u> <u>restriction of 65 flights per night</u>, have **UNLIMITED** overnight flights, as well as <u>increase the use of the north runway by 2 hrs</u>, 6am-12pm.

Key Takeaway

s and Use

Increased night flights = Increased noise exposure = Increased adverse effects on our health

What does the HSE say?

HSE Environmental Health Submission, Jan 2021 to Fingal County Council

States that

"All efforts should be made by the DAA to ensure as many people as possible are protected from adverse health effects of aircraft noise and that the WHO 45db day and 40db night thresholds <u>should</u> have been used for ground noise assessments by the DAA"

What does the Dept of Health say?

Department of Health, Feb 2021, submission to Fingal County Council stated that

- Environmental noise is one of the top environmental risks to physical and mental health
- Night noise can lead to decreased slow wave sleep and increased awakenings
- **Suggested 8 hour 'protected' period**, a sleep time of 8 hrs protects 50% of the population from adverse health outcomes
- DAA provide mitigation >55db night
- This submission states proposed changes will increase sleep disturbance in Fingal residents and increase overall daily noise **DESPITE** mitigation measures

What does the National Office for Environmental Health Services(HSE) say?

The National Office for Environmental Health Services (HSE), Feb 2022, submission to Fingal County Council stated

Strong recommendation re WHO 45db and 40 db night limits

What does the Fingal Council Council say?

Fingal County Council internal report, Fingal Internal Consultee, Oct 2021

States:

"Removal of conditions 3(d) and 5 will have an adverse effect on a large percentage of the population <u>AND</u> mitigation should be based on WHO recommendations"

Confidential – Limited Access and Use

But Wait!

- Fingal County CEO is **suggesting FCC ignore WHO health recommendations** for aircraft noise in the development plans
- That FCC should support the DAA request to reject the amendments surrounding aircraft noise on the material alterations to the Draft Fingal development plan
- Removing this from the development plans will remove the FCC councilors ability to bring the communities concerns surrounding noise to the planning authority
- Takeaway: "The Chief Exec shall be independent in the performance of the functions of the competent authority "

What can be done!

Pearse Sutton St Margarets The Ward Residents Committee

Community Liaison Group

28. A Community Liaison Group shall be established, involving representation of the Saint Margaret's Community, Fingal County Council and the Dublin Airport Authority. The composition of the committee and any variation thereof shall be subject to the prior agreement of the planning authority. The committee shall facilitate consultation with the existing community in accordance with the policies and objectives of the Fingal County Development Plan, 2005-2011 in relation to Saint Margaret's.

Reason: To provide for ongoing communication, dissemination of information and consultation with the local community affected by the proposed runway.

Fingal Development Plan 2005 - 2011

Objective DAO9:

To develop a consultative board based on international best practices involving the existing communities, Fingal County Council, Aer Rianta and other appropriate stakeholders, to consult about the detailed resolution of the future of the communities in the area and to seek consensus about the nature of change.

Objective DAO10:

To prepare a strategy for 'St. Margaret's Special Policy Area' involving consultation between the existing community, Fingal County Council and the Dublin Airport Authority.

International Panel to assess the future of St Margarets

- Relocation
- Insulation
- Voluntary purchase

Revenue can be generated along the grounds of the 'Polluter pays' principle.

- Environmental charge added to passenger charge
- Environmental charges levied by the daa ring fenced for mitigation and relocation schemes for residents most affected

More Reading

Sustainability – Avolon's 2023 outlook

Sustainable aviation fuel (SAF) promises to be the interim solution to the infrastructure and vehicle development challenges of decarbonising the industry, but the economics will need to be transformed. SAF can cut lifecycle emissions by up to 80% today but comes at a cost three to five times that of existing jet fuel. Economies of scale are needed. SAF production tripled in 2022 to an estimated 300 million liters but still represents only 1% of the 30 billion hoped to be produced in 2030. Policy initiatives in the United States and Europe are ramping up as other decarbonisation pathways remain over the horizon. Lifting SAF production to 10% of global jet fuel consumption will require \$250 billion in investment, further underlining the collaboration needed between all industry stakeholders.

Tourism deficit

INBOUND TOURISM VERSUS OUTBOUND TOURISM

€8.3bn

Total expenditure by Irish residents on outbound trips during 2019

- CSO statistics on tourism (<u>https://www.cso.ie/en/releasesandpublications/ep/p-syi/statisticalyearbookofireland2020/tt/tourism/</u>) state that €8.3bn was spent on overseas trips in 2019 by Irish residents.
- In contrast, **€5.1bn** was spent by overseas residents in Ireland in 2019:
- This equates to a **net loss in tourism in 2019 of €3.2bn**. From 2014 to 2019 there have been tourism deficits. One can assume that this pattern of losses will continue into the future. These losses facilitated by aviation have not been factored into the daa's or ANCA's Cost Effective Analysis. The analysis provided only factors in the positive effects of inbound tourism and ignores the negative effects of outbound tourism, facilitated by aviation.

Aviation Statistics – Q3 2022

DublinAirport DUB+

Passenger Profile Q3 2022





Holiday Leisure represented 51% of Q3 2022 passengers.

- 66% travelling to European Destination
- 60% of Holiday Leisure passengers were Irish residents
- Social grade of Holiday Leisure passengers has shifted post pandemic, with 40% being C2DE (vs 27% Q3 19)

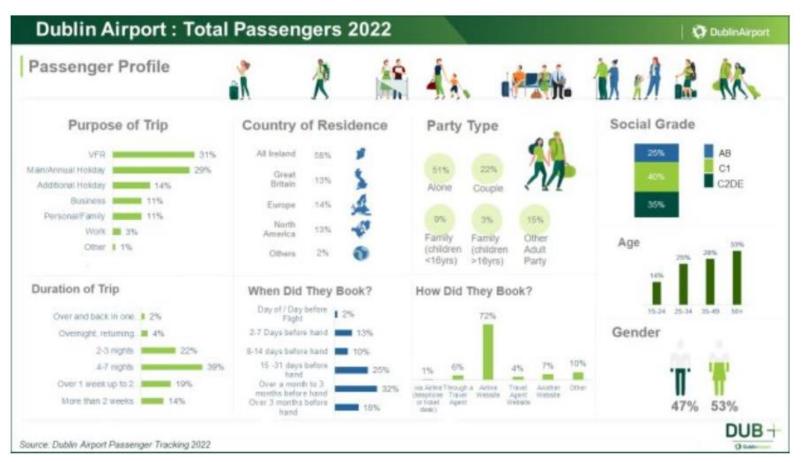
VFR Profile represented 29% of total passengers, this profile remains largely unchanged from pre-covid travel.

- 29% of passengers were VFR
- 39% travelling to UK
- 19% UKP, 20% London

7.5 % of Q3 22 passengers were Business travellers considerably down year on year.

- 19% travelling to London vs 26% Q3 19
- Residency shift from the UK with 18% of business passengers being UK residence vs 28% Q3 19
- 3% passengers travelling over and back in same day vs 8% 03 19

Aviation Statistics – 2022



Aviation Statistics for Dublin vs Shannon 2016 - 2019



COP27 – CLIMATETRACE.ORG



Dublin Airport largest Irish polluter last year - COP27 data

Updated / Wednesday, 9 Nov 2022 18:36



Dublin Airport was the specific source for just over one million tonnes of Ireland's greenhouse gas emissions in 2021

f 💟 in 🖸 🕞

🔨 North Runway 🍸

For over 40 years Dublin Airport has planned to have a 2nd runway. Fingal Co Co were tasked with managing the land around the airport ensure development would not occur under the proposed flight paths which were up until now straight out. St Margarets & The Ward were effectively sterilised and new housing was severely restricted as a result. Neighbouring areas of Coolguay and Kilsallaghan were not restricted but now find themselves under a flight path. https://dublinairport.flights



1968

Plans Drawn Up Dublin Airport first present draft plan that includes two parallel runways



Fingal

1st Fingal Development Plan includes Public Safety and Noise Zones taking the North Runway into account.



Overruled

An Bord Pleanála overrule inspector and grant permission for North Runway including operating restrictions at night



Construction Construction of the North **Runway** begins



2004

North Runway Planning Dublin Airport begin planning process for North Runway



2006

Refused Permission

An Bord Pleanála inspector recommends refusing permission for North Runway due to excessive noise impact



2010

Terminal 2

Terminal 2 is opened. This triggers a limit of 32 million passengers per annum through the airport

2019 32 Million

Dublin Airport exceeds 32 million passengers per annum. No enforcement proceedings are taken.



Appealed

Fingal Co Co grant permission for the removal of night-time flight restrictions. It is appealed to An Bord Pleanála. A decision is due in 2023.

Sept 2022

Warning Letter

Fingal Co Co issue a warning letter to Dublin Airport as they initiate an investigation into breaches of planning permission



Planning Hearing

An oral hearing is expected for 2023. The St Margaret's The Ward Residence Committee will need to fundraise to fight for our homes and our health.

2019

Aircraft Noise Act

Ireland enacts the Aircraft Noise (Dublin Airport) **Regulation Act 2019 including** the provision for Dublin Airport to apply to have operating restrictions removed



Night Flights

Dublin Airport apply for planning permission to remove the operating restrictions relating to nighttime flights and for new flight paths that turn 1.18 nautical miles from the runway.

August 2022



Runway Opened North Runway is officially opened. Flight paths being flown do not match what **Dublin Airport were granted** permission for in 2007.

Sept 2022

DAA respond to the Joint Committee on Transport and Communications and admit to variances in departure flight paths.

