

Gareth O'Brien
North Runway Technical Group
24 White Ash Park
Ashbourne, Meath A84 H563

gobrien@yupon.com

24 April 2025

Mr. Kenny Jacobs, Chief Executive Officer
daa plc
Three, The Green,
Dublin Airport Central,
Dublin Airport, Swords, Co Dublin, K67 X4X5

cc: Minister Darragh O'Brien (Transport & Environment)
Gillian Toole TD, Darren O'Rourke TD, Minister Helen McEntee, Minister Thomas Byrne
Louise O'Reilly TD, Robert O'Donoghue TD, Grace Boland TD

Dear Mr. Jacobs,

I am writing in response to a recent letter circulated by your Head of Communications, Sarah Ryan, in which serious accusations were levelled against a member of the Ratoath community—accusations of spreading "falsehoods" and making "unfounded" claims about the North Runway and its flight paths.

The tone and content of that letter are disappointing and concerning. Not only does it seek to discredit a member of the public by labelling their contributions as dishonest, but it does so while offering a selective and at times misleading version of events—particularly regarding the design and implementation of North Runway departures. This kind of defensive posturing from a state-owned company risks further eroding public trust at a time when meaningful engagement, transparency, and corrective action are urgently needed.

Let me clarify the real issue: we are not asking daa to alter approved flight paths—we are asking daa to restore the original, legally permitted route outlined in your 2007 Environmental Impact Statement (EIS), the same route which was a core justification for granting planning permission. The decision to diverge from that route was made after planning permission was granted, via the design of the Standard Instrument Departure (SID) procedures. This post-approval change, made without updated environmental assessment or valid public consultation, represents a serious breach of the original planning conditions.

In simple terms:

We are asking daa to fly the route that daa proposed, daa justified, and An Bord Pleanála approved.

Your team's insistence that these deviations are based on international safety requirements is misleading. The IAA has clearly stated it did not require these new flight paths. ICAO documentation cited by daa does not mandate a turn—it provides multiple options for safe operation. daa chose a departure profile that prioritizes theoretical future capacity via independent parallel runway operations, despite the fact that:

- Independent operations are not currently in use at Dublin Airport.
- They are not required to reach daa's stated capacity of 60 million passengers.
- The departure turns, introduced to enable this mode, exposes thousands of additional residents to noise and undermines the EIS upon which the runway's planning permission depends.

Furthermore, while your team claims the current routes are "approved" by the IAA, this too is a misrepresentation. The IAA does not "approve" flight paths in the planning sense. Their role is to ensure that SID procedures comply with minimum ICAO standards under Instrument Flight Rules—not that they comply with planning permission or environmental mitigation measures. This legal nuance is essential, and ignoring it conflates regulatory safety approval with planning law compliance.

Several of your communications rely on the notion that the original flight paths were merely "indicative." Yet your own EIS explicitly described any future variation as "relatively small," arising from aircraft performance or weather conditions—not 30 to 86 degree turns within two nautical miles, in stark contrast to the planned "straight ahead for five miles." This is not a minor adjustment. It is a radical departure from the original proposal, and it materially increases the impact on surrounding communities—particularly in East Meath.

Also troubling is daa's continued use of vague or misleading language, such as:

- Referring to a "slight" 15-degree turn, when all aircraft turn between 30 and 86 degrees.
- Suggesting fewer people are now overflown, without acknowledging that reverting to the planned route would further reduce overflight of residential areas.
- Claiming that "flight paths must be adjusted for safety" while never clearly justifying how these turns are safer—or acknowledging that they actually increase conflict with missed approaches from the South Runway.

daa's repeated assertions about its commitment to residents ring hollow when accompanied by template responses denying breaches of the Noise Preferential Routes (NPR), the absence of any noise abatement procedure for RWY28R, and continued overflights of areas like Ratoath far outside the Environmental Corridor outlined in your EIS.

It is also disappointing that engagement with daa has remained one-sided. Attempts by community representatives to open transparent dialogue, or to have daa appear in public alongside experts capable of scrutinizing your technical claims, have been consistently declined.

Mr. Jacobs, this situation could be improved if daa showed a genuine willingness to:

1. Acknowledge that the SID design deviates from the permitted flight path.

2. Publish the specific application where daa claimed flight paths were merely indicative.
3. Commission a new environmental assessment, including a proper noise study, to determine the impact of these revised routes.
4. Revert to the planned departure route, thereby reducing community impact and aligning operations with the planning permission.

As CEO, I urge you to take responsibility for restoring trust in this process. There is still time to correct the course—but doing so will require less messaging and more action. Communities like Ratoath and Ashbourne are not demanding perfection. We are demanding honesty, accountability, and compliance with planning law.

Regards,

Gareth O'Brien BE (Civil) MSc
North Runway Technical Group