

Annex E4: Consulted Routes vs Actual Routes Comparison

Source

Compiled from NRTG analysis of daa 2016 consultation materials, 2022 opening-day SIDs, and 2023 revised SIDs.

Timeline of Route Versions

Version 1: 2007 EIS (Planning Permission Basis)

- Straight-ahead on runway heading (278 degrees) for 5 nautical miles to 3,000ft before any turns
- This is the Noise Preferential Route locked in by ABP Condition 1
- Environmental Impact Statement assessed noise impacts based on this route
- Overflies primarily agricultural land northwest of the airport

Version 2: 2016 Consultation (Scenario B, Selected)

- Split divergence: 15 degrees north AND 75 degrees north for westerly North Runway departures
- Based on "international standards for mixed mode operations require that aircraft courses diverge by at least 15 degrees approximately one nautical mile after take-off"
- This 15 degree formulation was itself a misinterpretation of ICAO 9643 (which requires 30 degrees for segregated parallel operations)
- Consulted only within Fingal (see Annex E3)
- Planning application subsequently withdrawn; never submitted

Version 3: August 2022 Opening-Day SIDs

- All aircraft turn 30 degrees (to heading 308) at approximately 650ft (400ft AGL)
- Approximately 75% then turn to heading 004 (a total deviation of 86 degrees)
- Never consulted on; communities only became aware when aircraft began overflying
- daa subsequently acknowledged: "Oops"

Version 4: February 2023 Revised SIDs (Current)

- All aircraft still turn 30 degrees at departure end of runway at 650ft
- Approximately 55% then turn to heading 004 (86 degrees total)
- Remainder continue on heading 308 (30 degrees deviation)
- Described by daa as "closer to the route previously communicated"
- Still materially different from any route ever assessed in an EIS or consulted upon

Summary

Route Version	Consulted?	EIA conducted?	Planning permission	Implemented?
2007 EIS (straight-ahead)	Via EIS oral hearing	Yes (2004 EIS)	Yes (Condition 1)	No
2016 Scenario B (15/75 deg)	Yes (Fingal only)	No (application withdrawn)	No	No

2022	Opening	SIDs	No	No	No	Aug 2022 to Feb 2023
(30/86 deg)						
2023	Revised	SIDs	No	No	No	Feb 2023 to present
(30/86 deg)						

None of the consulted-on flight paths were ever implemented. The flight paths that were implemented were never consulted on.

Aarhus Relevance

This comparison demonstrates a complete disconnect between the public participation process and the operational reality. The public participated in decisions about routes that were never built, and was given no opportunity to participate in the decision to implement the routes that were actually built. This pattern satisfies the requirements for a finding of non-compliance with Articles 6 and 7 of the Aarhus Convention.