

Annex S3-A: Chapter-by-Chapter EIS Invalidation Analysis

North Runway Technical Group, 24 March 2026 Complaint ref: CPLT(2026)00881

Summary

The 2004 Environmental Impact Statement for Dublin Airport's North Runway (ABP ref: PL 06F.217429) comprises 19 chapters and 8 technical appendices. The 2005 EIS Addendum introduced Option 7b (the operational mode adopted as Condition 3).

The entire EIS was predicated on straight-ahead departures from Runway 28R over agricultural land northwest of the airport. Since August 2022, aircraft have departed on 30 to 86 degree turns at 400ft AGL, overflying residential areas in County Meath 8 to 12.5km from the assessed route.

8 of 19 chapters (42%) are directly invalidated by the route change. 2 further chapters are partially affected. 4 of 8 appendices are invalidated. The entire 2005 Addendum is invalidated. The three chapters on which the Board relied when overruling the Inspector's recommendation of refusal (Noise, Hazard, Human Health) are all invalidated.

EIS Chapters: Invalidation Status

Ch	Title	Status	Reason
1	Introduction	Not affected	
2	Planning Context	Not affected	
3	Alternatives Considered	Not affected	
4	Project Description	Partially affected	Describes runway operating mode (Option 7b) that was never implemented
5	Traffic and Transportation	Not affected	Concerns surface access
6	Soils and Geology	Not affected	
7	Land Use	Invalidated	Public Safety Zones and noise zones derive from straight-ahead departure tracks; actual tracks place these zones over a different area entirely
8	Water	Not affected	

Ch	Title	Status	Reason
9	Ecology	Invalidated	Bird strike risk assessment and compensation habitat were location-specific to the straight-ahead route. daa subsequently built the compensation habitat at Thorntown, directly under the actual departure path at approximately 2,000ft, well within the bird strike risk zone
10	Landscape and Visual	Invalidated	Visual impact assessment assumed aircraft over agricultural land, not residential areas
11	Archaeology	Not affected	
12	Architecture	Not affected	
13	Socio-Economic	Not affected	Concerns employment and economic activity
14	Air Quality	Invalidated	Emission dispersion modelling used the straight-ahead flight tracks as emission source locations; actual emissions are deposited over a different area
15	Climate	Partially affected	Total emissions unchanged but geographic distribution differs
16	Noise	Invalidated	Every noise contour, every population count, every insulation threshold, every assessment of significant effect derives from straight-ahead departures. This is the central chapter of the EIS and the primary basis on which the Board overruled the Inspector.

Ch	Title	Status	Reason
17	Hazard Assessment	Invalidated	Third-party crash risk zones and Public Safety Zones are calculated from the departure track geometry. The PSZs for the actual routes have never been published.
18	Human Health	Invalidated	Sleep disturbance, cardiovascular effects, annoyance thresholds, and school noise exposure all derive from the noise and air quality chapters (16 and 14), both of which are invalidated.
19	Schedule of Environmental Commitments	Invalidated	All mitigation commitments (insulation eligibility, buy-out zones, monitoring requirements) flow from the impact chapters. The commitments address impacts on a population that is not the population actually affected.

EIS Appendices: Invalidation Status

App	Title	Status	Reason
A	Traffic	Not affected	Surface access
B	Ecology (bird surveys)	Invalidated	Survey locations and risk assessment specific to straight-ahead route; compensation habitat at Thorntown now under actual departure path
C	Soils	Not affected	
D	Water	Not affected	
E	Archaeology	Not affected	

App	Title	Status	Reason
F	Air Quality	Invalidated	Dispersion modelling based on straight-ahead emission tracks
G	Noise	Invalidated	The largest appendix. All modelling, all contours, all population exposure tables based on straight-ahead departures
H	Hazard	Invalidated	Third-party risk contours and PSZ geometry based on straight-ahead tracks

2005 EIS Addendum (Option 7b)

The August 2005 Addendum introduced Option 7b as the preferred runway operating mode. This became Condition 3 of the planning permission. The Addendum changed only the traffic split between runways (the proportion of departures using 28R versus 28L). It did not change the flight tracks: all noise modelling in the Addendum assumed straight-ahead departures, as in the original EIS.

Option 7b was never implemented. The Addendum is entirely invalidated.

Significance

The Board overruled the Inspector on the basis of three chapters: Noise (16), Hazard (17), and Human Health (18). All three are invalidated. The Board's finding of "no significant deterioration" was predicated on operations that have never been flown.

At the point where aircraft were supposed to be exiting the statutory noise zone on the assessed route, they are in fact 12.5km away over Oldtown, heading for Ballyboughal. This is not a marginal deviation. It is a fundamentally different project from the one assessed and permitted.

Key Findings from the EIS Text

The following findings are drawn directly from the 2004 EIS (Mouchel Parkman for daa, December 2004, 393 pages).

The foundational flight track assumption (EIS 16.1.3.4)

"For the proposed runway, it was assumed that the aircraft would join up with the tracks used for the existing 10/28 runway which was agreed with the Irish Aviation Authority to be a reasonable assumption at this stage."

The entire noise assessment is built on straight-ahead departures from the new runway joining the existing tracks. The IAA agreed this was “reasonable.” The routes actually designed by AirNav Ireland turn 30-86 degrees away from these tracks.

No noise monitoring location in County Meath (EIS 16.1.5.2)

The 10 night-time noise monitoring locations are all in Fingal: River Valley Swords, St Margaret's, Malahide, Portmarnock (x2), Santry, Dublin City, Poppintree, Ward Upper/Bishopswood, Skephub-ble. Not one in County Meath. The communities now overflowed (Ratoath, Ashbourne, Kilcoskan) do not appear in the noise assessment at all.

Bird hazard depends on departure routes (EIS 17.10.1.5)

“A hazard is created not merely by birds which cross or are attracted to the airfield itself but also bird activity in the area of the approach and departure routes for aircraft.”

Changed routes invalidate the bird hazard assessment. daa subsequently built the compensation habitat at Thorntown, directly under the actual departure path. Aircraft overfly the habitat at approximately 2,000ft, well within the bird strike risk zone.

Crash risk geometry depends on the track (EIS 17.2.3.3)

Crash location distributions “are related to runway ends and extended runway centre-lines.” The Public Safety Zones were calculated for straight-ahead departures. The PSZs for the actual 30-86 degree departure routes have never been published.

daa's caveat does not cover this deviation (EIS 16.1.3.5)

The EIS notes: “the absolutely precise route that an aircraft will adopt is very dependent on factors such as aircraft performance, weather, instrumentation accuracy and pilot skill. Therefore the tracks shown in Appendix G3 cannot be considered to be definitive. However the logarithmic nature by which sound is described, and the averaging process of the assessment procedure, means that the resultant inaccuracies are relatively small.”

This caveat contemplates minor dispersion around the modelled track (pilot skill, weather), not a designed-in 30-86 degree turn to a completely different geographic area. A 12.5km lateral displacement over populated areas is not a “relatively small” inaccuracy.

Source: 2004 EIS (Part 2, Text), 2005 EIS Addendum (Section 16, Option 7b), ABP Inspector's Report (PL 06F.217429). All available at www.dublin-north-runway.com/submission-annexes/.