

S

SECTION 131 FORM

File With \_\_\_\_\_ S. 37

Appeal NO: ABP 314485

TO: SEO

Defer Re O/H ☐

Having considered the contents of the submission dated/ received 23 / 12 / 24  
from

Thomas Conahy 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 issues

E.O.: [Signature] Date: 2/1/25

To EO: \_\_\_\_\_

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: \_\_\_\_\_

Allow 2/3/4 weeks – BP \_\_\_\_\_

EO: \_\_\_\_\_

Date: \_\_\_\_\_

AA: \_\_\_\_\_

Date: \_\_\_\_\_

File With \_\_\_\_\_

**CORRESPONDENCE FORM**Appeal No.: ABP 314485Please treat correspondence received on 20/12/24 as follows:

. Update database with new agent for Applicant/Appellant \_\_\_\_\_

. Acknowledge with BP 23. Keep copy of Board's Letter ☐

1. RETURN TO SENDER with BP \_\_\_\_\_

2. Keep Envelope: ☐3. Keep Copy of Board's letter ☐

Amendments/Comments

Resp Recd

4. Attach to file

(a) R/S ☐(d) Screening ☐(b) GIS Processing ☒(e) Inspectorate ☐(c) Processing ☒RETURN TO EO ☐Plans Date Stamped ☐Date Stamped Filled in ☐EO: [Signature]AA: F. KhattarDate: 20/11/25Date: 21/11/25

**David Behan**

---

**From:** B BEYER <bbeyer2021@gmail.com>  
**Sent:** Monday 23 December 2024 03:35  
**To:** Appeals2  
**Subject:** Thomas Conaty Observation Relevant Action 314485  
**Attachments:** Thomas Conaty Observation for Relevant Action Ref 314485 Dec 2024.docx

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear James,

Please see attached observation for Thomas Conaty for Relevant Action case # 314485.

Thank you,

Bernadette  
085-8640064

**Coolquoy, The Ward Co.Dublin**

21/12/2024

An Bord Pleanála,  
64 Marlborough Street,  
Rotunda, Dublin 1.

**An Bord Pleanala Ref: 314485**

Dear Secretary at An Bord Pleanála,

My opinions still stand as per my last observation to you. Please REFUSE PERMISSION to this Relevant Action Draft Decision.

Furthermore, I am shocked in the inspectors report to learn that ABP sought no further comments from IAA, who is the regulator of Irish Aviation, but yet would rather take what DAA comments, who the public know as dishonest manipulators, at face value. This is absolutely unacceptable of ABP to do this.

**DAA are showing their true colours as a deceiving semi-state government entity that continue to break the law by breaching their various planning conditions including:**

- 1. Passenger Cap (breached in 2019 & 2023 and by Nov 2024)**
- 2. Flight Paths (continue to breach since opening of NR opened in 2022)**
- 3. Night Flights (continue to breach with more than 110 movements per night)**

Why would ABP ever consider that what DAA say in an application to be fact without consulting the regulator as in this case, the Irish Aviation Authority.

Why would ABP even consider entertaining a planning application from an applicant, such as DAA, who are already clearly breaching planning conditions. This case should really be thrown out until DAA can demonstrate that they can follow planning laws.

The DAA are essentially trying to get you, An Bord Pleanála, to rubberstamp the divergent flight path over our homes without following the planning permission granted by ABP in 2007. This retention flight path was never environmentally screened properly and no public consultation ever conducted. The recent change of Noise Contour Maps, that only came to the public's attention in March 2024, again highlights the devious way this process is being carried out by DAA. This is Unauthorised Development and must be stopped immediately.

Under NO CIRCUMSTANCES do I want An Bord Pleanála to grant permission to DAA for:

- 1. Noise Quota System WITHOUT a 13,000 limit. Experts state that a NQS DO NOT WORK unless a limit is set in place. A limit must be in place if a NQS is in place.**

2. A change of night time hours from 11pm – 7am to a new time of midnight should not happen. Medical experts emphasise the importance of sleep and the health affects that lack of sleep can have on your body. It is our human right to have peaceful 8 hours of sleep.
3. Current Unapproved Divergent Flight Path. If ABP rubberstamps this unapproved divergent flight path, it will undermine the planning system throughout Ireland. As far as I am concerned, this is Unauthorised Development and should be stopped with immediate affect.

#### BACKGROUND:

On and since 24<sup>th</sup> August 2022, my peaceful home and garden of 40 years in Coolquoy, The Ward, has been drastically disturbed. Without warning or without consultation. DAA are essentially trespassing over our lands and our privacy has been taken from us.

In 2007, I attended a public meeting near at Dublin Airport hosted by the DAA team leading the North runway project and I asked one question to a member of their team called Siobhan O'Donnell, Will my area Coolquoy and Kilcoskan be affected by this runway flight path? I was told by Siobhan O'Donnell -- unequivocally No!

DAA lied to me in 2007 and they are still lying to me now in 2024!

Our family homes are located in Noise Zone C in the rural village of Coolquoy and we are not supposed to be experiencing the level of aircraft noise that is coming from this north runway. It is unbearable. The flights were never to go across our community yet now we find ourselves in a situation of total turmoil with the flight paths going over our homes every two minutes. No planning permission was ever granted to DAA to fly over Coolquoy and Kilcoskan area. This divergent flight path has caused many of our neighbours to sell up and move away at a loss so as to escape the noise.

A number of years ago I was diagnosed with tinnitus and vertigo. I have been able to maintain it and keep it under control until this runway opened. I have found that the ringing in my ear is now amplified even more when aircrafts fly over my home and my garden. The ringing in my ear can be so tremendous and unbearable that I need to stop talking, sit down and at times lie down.

My home is now noisier than ever as I have to turn the radio sound up, turn the tv sound up, I feel like I am shouting when people call me on the phone as the airplanes are flying overhead and it's so loud that I need to talk louder so people can hear me. This is a terrible way to live and is now putting me and my wife in jeopardy of developing further long-term health issues.

I am a member of Corrstown Golf Club for over 26 years. It has been a great social space for me to exercise, to keep fit and interact with other retired golfers, enjoying great friendships along the way. Unfortunately, the game of golf has changed in Corrstown Golf Club since this north runway opened. It is too noisy and loud for me and my retired friends to go out and enjoy a round of golf. The DAA has taken our physical healthy wellbeing away from us in a blink of an eye by flying the aircrafts over

the golf course non-stop. We are devastated. I used to play golf 3x times per week, now I am lucky if I play once a week because of the noise is unbearable at times on the course and it is not worth it.

I am so concerned for my children and grandchildren now living in the area as I encouraged my children to buy and build homes in this community over the last few years. We all did our research and looked at maps and plans for the new North Runway, and knew when it was to open, it would not have flight paths over Coolquoy and Kilcoskan. Yet now we are faced with flights flying over us every two minutes.

My grandchildren attend the local primary school, Kilcoskan National School, as did my own children in 1980's and the beautiful peaceful rural school is now destroyed with noise and pollution from these aircrafts. No amount of insulation will help the kids in the school yard. I am now unable to attend any public family events at Kilcoskan National School because of the roaring jets flying overhead at 84dB+, I cannot hear what is going on.

Local children never get a break from the noise. They go to school, its aircraft noise, they go home its aircraft noise, play in the garden its aircraft noise, play in their bedroom its aircraft noise, its just constant aircraft noise in their lives. This is going to have major long term health implications on my grandchildren and all other families and children living in the area.

Fingal Development Plan has classified our area as in Noise Zone C yet the DAA now want to it into Noise Zone A/B without warning or consultation with local authorities, local homeowners and landowners. This is unacceptable.

Please see photos attached for your attention:

1. Aircrafts flying over my once peaceful home in Coolquoy RV
2. Aircrafts flying over Corrstown Golf Club where I go for my health and fitness for the last 26 years
3. Example of aircraft flying over my home/Kilcoskan National School with noise 84dB+ at 9:07am
4. Report from FAIRCO (Guardian Glass) the window supplier

Please REFUSE PERMISSION on this relevant action – DAA must follow 2007 planning permission. Give us back our lives. Let us sleep!

Regards,

Thomas Conaty

087-2786699 tomconaty1@gmail.com



















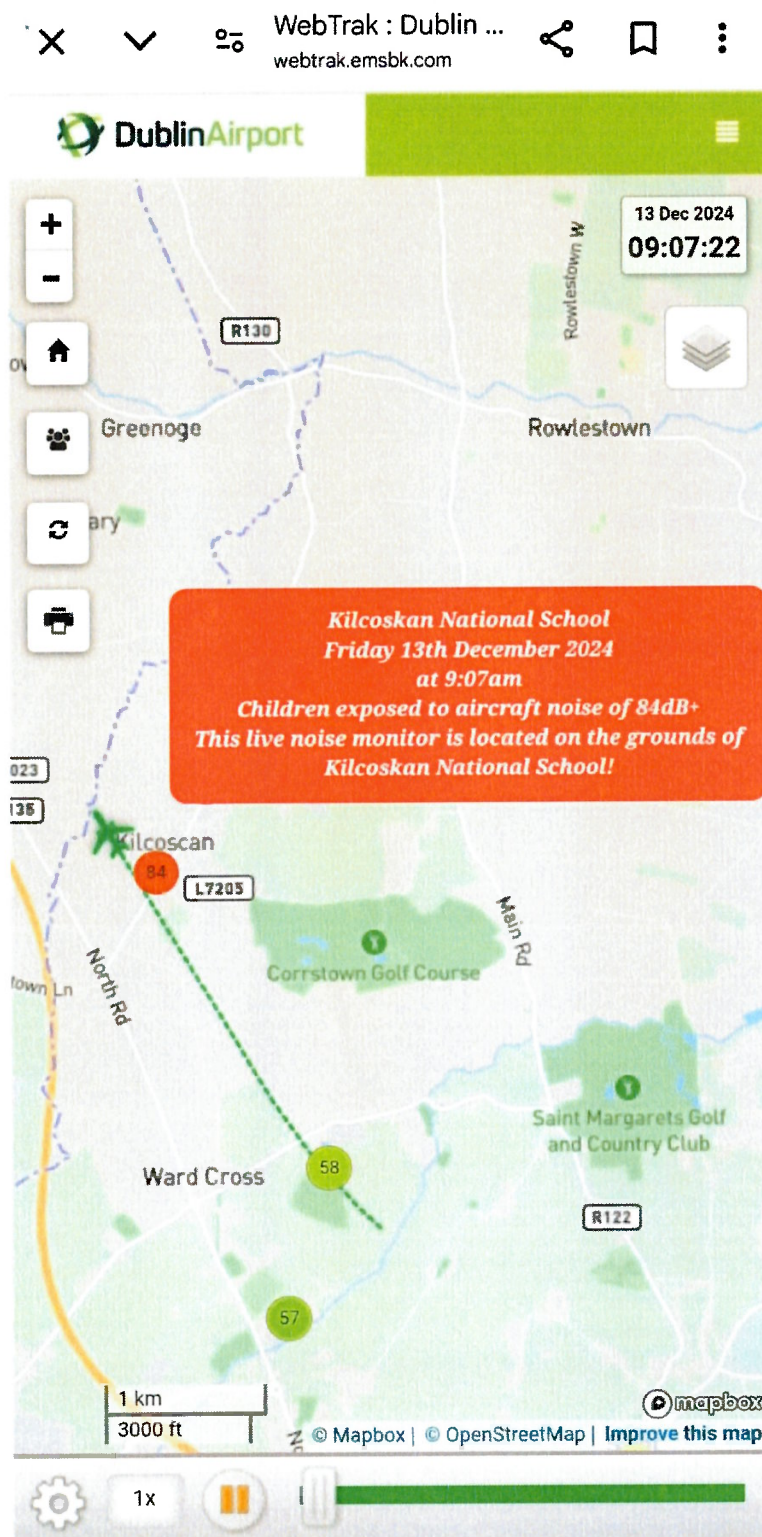












My grandchildren attend Kilcoskan National School located next to our home. We are experiencing noisy aircrafts flying over at 84dB+. This is unacceptable and detrimental to the children's long-term health and education. No amount of insulation can protect the children playing outdoors in the school yard.





## Acoustic Performance

### Glazing Configuration

8.76 mm (44.2) LamiGlass Sound Reduction

14mm Cavity

6mm Float Glass

### Sound Reduction Indices

Frequency, Hz / dB*						Rw	C	Ctr	OITC	STC
125	250	500	1000	2000	4000	41	-2	-6	32	41
26	30	38	47	45	57					

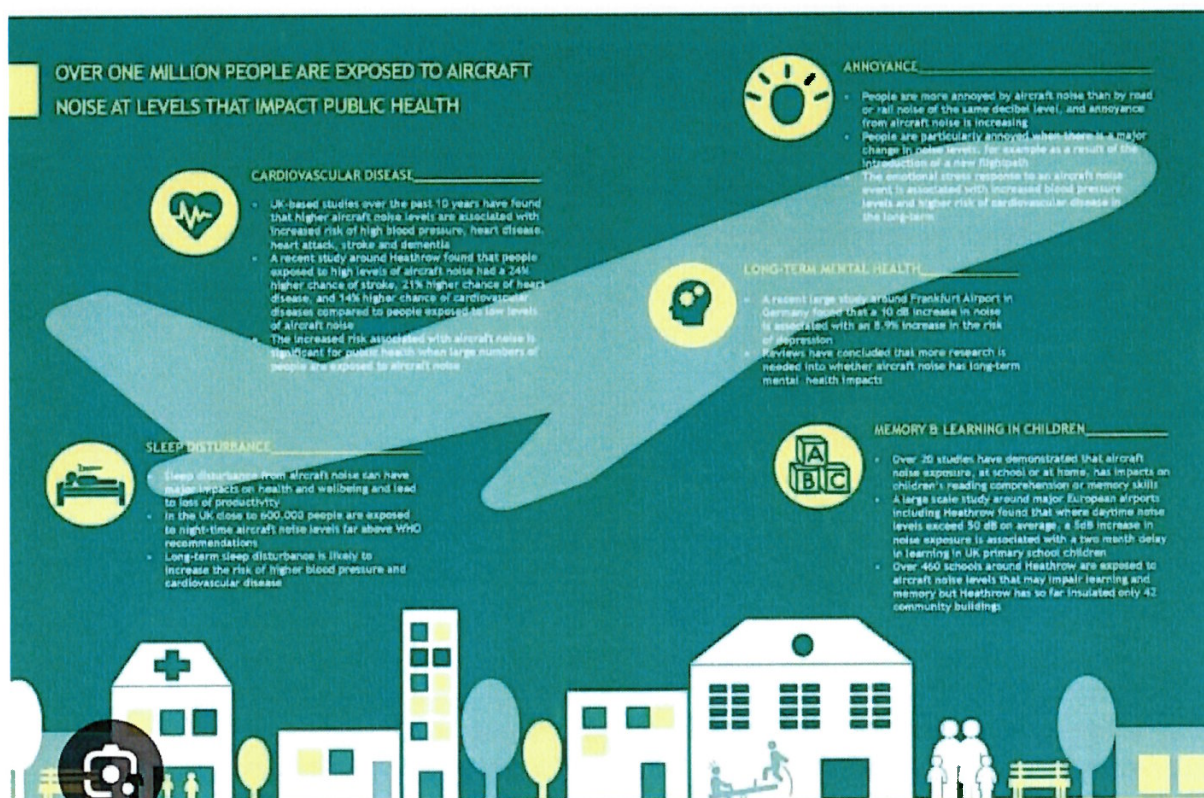
\*The values expressed in the frequency table correspond to the central values of the 1/3 octave band

Disclaimer: The acoustic performance data provided in the reports is based on a test protocol or an estimation and may be used if user actual glazing is identical to input data described herein. Acoustic performance data herein is only applicable for glazing dimensions 1.23 m x 1.48 m (as per testing standard). Estimation of acoustic performance is based on component-similarity assumptions which are derived from measured data and interpolation to expand the database of values from test protocols. Due to inherent variations in acoustic performance when testing in accordance with EN ISO 10140-3/EN ISO 10140-2, some variation in the calculated performance can also be expected. As such, the weighted performance,  $R_w$ , and adaptation terms,  $C$  and  $C_{tr}$  should typically be considered to be accurate within  $\pm 2$  dB. However, wider deviations can occur. Actual performance may vary according to the glazing dimensions, frame system, noise sources and many other parameters. The acoustic performance data herein should not be used as a substitute for tests of actual glazing. For more information, please consult Assumptions and Terminology section in Guardian Acoustic Assistant. By accessing this calculator, you agree not to alter or modify the generated report data and information, by any means. Any manual alteration will be your own responsibility and will annul all the content of the report.

Monday, December 16, 2024 | Acoustic database 20221229

We recently upgraded the windows in our home. The costing was astronomical compared to the scant €20,000 that DAA are proposing to offer. Who is dictating the price allocation for the insulation scheme? Surely, it's not the DAA? Obviously, inflation has not been taken into account as €20,000 value 4 years ago is not the same value for insulation in today's market prices increase.

See attached the report from our windows company FAIRCO. You can see the glazing was installed with sound protection in mind yet it is still not sufficient to keep the noise out.



Experts believe that lack of good quality sleep can lead to many problems including: Cardiovascular disease, Depression, Cognitive Challenges, Immunodeficiency, Mental Health problems and more.

At my age I should be getting up to 9 hours of good quality non interrupted sleep.

More points of importance that I want to highlight to the board include:

## Introduction

The Inspector's Report has rightly concluded that the adverse impact of the Relevant Action on the surrounding communities would be too severe to justify granting permission. The proposal's request for additional hours of operation on the north runway and a projected increase in night-time activity would result in significant additional awakenings, which are well-documented to cause substantial health and well-being consequences, including increased risks of cardiovascular disease, mental health disorders, and sleep-related cognitive impairments.

Given these findings, it is essential that any current or future expansion of airport activity during night-time hours be disallowed but at the very least strictly limited by a movement cap of 13,000 annual night-time flights, as proposed.



Proposed operations on the north runway from 6am to midnight presents unacceptable risks to health and quality of life, and in particular will cause further catastrophic and unreasonable sleep disruption for residents and families already suffering due to north runway flightpaths.

The following summary points highlights the inadequacies of the DAA application:

### **1.0 Inadequacy of DAA Application**

- The Dublin Airport Authority (DAA) application fails to assess or mitigate the adverse effects of nighttime noise adequately. Average metrics like % Highly Sleep Disturbed (HSD) and  $L_{night}$  fail to capture acute impacts such as awakenings, which have immediate and long-term health consequences<sup>1</sup>.
- The inspector has defined that more than 1 additional awakening per night as a result of aircraft noise is a significant adverse impact<sup>2</sup>.

### **2.0 Insulation Limitations:**

- Insulation measures cannot fully mitigate nighttime noise due to factors like open windows, low-frequency noise, and peak noise events. The WHO average insulation value of 21 dB assumes windows are open 20% of the year, making insulation less effective.
- The introduction of a new insulation criteria of 80dB  $L_{ASMax}$  is welcomed, however, without a detailed set of maps indicating who qualifies for this the decision is incomplete.
- The proposed grant value of €20,000 is considered inadequate to fully insulate those homes that qualify. Comparisons to other EU countries are incomplete and do acknowledge the fact that construction costs in Ireland and particularly Dublin are close to the highest in the EU. The scheme should be redesigned to cover the full cost of insulation.
- Residential Noise Insulation Scheme (RNIS) and Home Sound Insulation Program (HSIP) do not meet modern health protection standards. Insulation is unsuitable for nighttime impacts and cannot substitute for operational restrictions like movement caps.

### **3.0 Necessity of the Movement Limit and Rejection of the Additional North Runway Operating Hours:**

- The movement cap of 13,000 nighttime flights is critical to reducing noise impacts and protecting public health. Without this cap, noise exposure levels will rise significantly, endangering the well-being of nearby residents.
- The proposed additional operating hours from 6am to 7am and from 11pm to midnight on the north runway are completely unacceptable. The flightpaths in operation from north runway are causing huge suffering, distress and sleep disturbance for tens of thousands of people in Fingal and Meath.
- Adding a further two hours to the schedule when most people are trying to sleep only makes an unreasonable situation even worse. The flightpath issue must be solved firstly before any other changes can be considered. For context, there were 40 departures between 6am and 7am on Monday 16 December 2024. This is the busiest hour of each day at the airport. It would be disastrous if these 40 departures were switched to the North Runway because they would now be taking a divergent turn and flying low (on full power while turning) over communities who should not be under or near to a flightpath. The volume and frequency would be much greater in the summer period.

---

<sup>1</sup> [https://www.europarl.europa.eu/RegData/etudes/STUD/2020/650787/IPOL\\_STU\(2020\)650787\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2020/650787/IPOL_STU(2020)650787_EN.pdf)

<sup>2</sup> The inspector has concluded “in conjunction with the board's independent acoustic expert that the information contained in the RD and the RA does not adequately demonstrate consideration of all measures necessary to ensure the increase in flights during the nighttime hours would prevent a significant negative impact on the existing population.”

#### **4.0 Unauthorised Flight Paths and Breach of Planning Conditions**

- The DAA has implemented flight paths that deviate significantly from those approved in the Environmental Impact Statement (EIS). These unauthorised deviations expose previously unaffected areas to significant noise impacts, creating unassessed risks.
- The deviations breach Condition 1 of the planning permission, which requires adherence to the originally assessed flight paths. No updated Environmental Impact Assessment (EIA) or planning application has been submitted for these changes.
- Affected communities have and are experiencing unreasonable noise levels without proper consultation or mitigation measures. Local schools have been impacted. The impact has been devastating for communities with families now feeling like they have no option but to sell their homes.
- The unauthorised flight paths undermine the planning system's integrity, setting a dangerous precedent for future projects. Granting permission under these conditions violates planning laws and obligations under the EIA Directive.
- There are multiple possible means of compliance with the pertinent ICAO regulations. IAA has received and approved only the one chosen by daa as Aerodrome Operator.
- Any inference or implication that IAA instructed or caused daa to deviate from the route approved in their planning permission **is not correct**.

#### **5.0 Night Flight Restrictions in Europe and Implications for Dublin**

- Major airports like Schiphol, Heathrow, and Frankfurt enforce strict caps or curfews on nighttime flights. Dublin's proposed 31,755 annual nighttime flights far exceed these airports' limits relative to passenger numbers.
- European airports prioritize reducing noise exposure to mitigate sleep disruption, cardiovascular risks, and stress.
- Adopting the 13,000-flight cap aligns Dublin with international best practices, ensuring proportional and sustainable operations.
- Without the movement limit the Noise Abatement Objective (NAO) set by ANCA for Dublin Airport cannot be fully achieved.

#### **6.0 Health and Environmental Impacts**

- Chronic exposure to nighttime aircraft noise increases the risks of cardiovascular disease, hypertension, and mental health issues. Children's cognitive development is adversely affected, impairing memory, learning, and overall performance.
- Health-related costs, including healthcare expenses and reduced productivity, are substantial and long-term. For example, Brussels Airport's health cost analysis suggests similar impacts at Dublin could reach €750m annually.
- The DAA analysis has not used the correct population datasets in determining the impacts. This underestimates the impact on the communities around the airport.
- Evidence from health agencies emphasizes that noise-induced sleep disturbance is a significant environmental health risk. Ignoring these risks contravenes principles of sustainable development and public health protection.

#### **7.0 Recommendations**

- Immediately halt unauthorised deviations and revert to the flight paths approved under the original EIS.
- At the very least, maintain the cap of 13,000 nighttime flights to prevent further degradation of community health and well-being, however due to the severity of the projected health and environmental impacts that nighttime aircraft noise presents, a complete ban on night-time flights should be strongly considered.

- Implement the Noise Quota System to incentivize quieter aircraft and ensure proportional operations.
- Reject the proposed additional hours of operation on the north runway for reasons outlined.