

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

## SECTION 131 FORM

Appeal NO: ABP 314485-22Defer Re O/H ☐Having considered the contents of the submission dated received 02/04/2024  
fromEoin Keary I 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 material issuesE.O.: Pat BDate: 18/04/2024

For further consideration by SEO/SAO

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: \_\_\_\_\_ Task No: \_\_\_\_\_

Allow 2/3/4 weeks – BP \_\_\_\_\_

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

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

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

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

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

## CORRESPONDENCE FORM

Appeal No: ABP 314485

M \_\_\_\_\_

Please treat correspondence received on 02/04/2024 as follows:

- |  |  |
|--|--|
| 1. Update database with new agent for Applicant/Appellant _____<br>2. Acknowledge with BP <u>23</u><br>3. Keep copy of Board's Letter <input type="checkbox"/> | 1. RETURN TO SENDER with BP _____<br>2. Keep Envelope: <input type="checkbox"/><br>3. Keep Copy of Board's letter <input type="checkbox"/> |
|--|--|

Amendments/Comments Eoin Keary response to S.13112/03/2024 02/04/24 ✓

## 4. Attach to file

- |   |   |
|---|---|
| (a) R/S <input type="checkbox"/>            | (d) Screening <input type="checkbox"/>    |
| (b) GIS Processing <input type="checkbox"/> | (e) Inspectorate <input type="checkbox"/> |
| (c) Processing <input type="checkbox"/>     |   |

RETURN TO EO ☐

	Plans Date Stamped <input type="checkbox"/>
	Date Stamped Filled in <input type="checkbox"/>
EO: <u>Pat R</u>	AA: <u>Anthony McNally</u>
Date: <u>18/04/2024</u>	Date: <u>25/04/2024</u>

## Stephen Sutton

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**From:** Bord  
**Sent:** Tuesday 2 April 2024 10:56  
**To:** Appeals2  
**Subject:** FW: ABP Case Num: ABP- 314485-22 Planning Authority Reference Num: F20A/0668  
**Attachments:** An Bord Pleanala Letter 2nd April 2024.pdf

**From:** Eoin Keary <eoin@edgescan.com>  
**Sent:** Tuesday, April 2, 2024 10:20 AM  
**To:** Bord <bord@pleanala.ie>  
**Subject:** ABP Case Num: ABP- 314485-22 Planning Authority Reference Num: F20A/0668

**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.

Hello,  
Attached is an observation/Objection to

Planning Authority Reference Num: F20A/0668  
ABP Case Num: ABP- 314485-22

Regards,

Eoin Keary  
10 Fairy house Lodge, Ratoath, Co Meath.

**Eoin Keary**

CEO

Edgescan

+353 879772988  
[eoin@edgescan.com](mailto:eoin@edgescan.com)  
[www.edgescan.com](http://www.edgescan.com)  
Dublin HQ





An Bord Pleanála  
64 Marlborough St.  
Dublin 1  
D01 V902  
02/04/2024

**RE: Case Number ABP- 314485-22 Relevant Action Application Dublin Airport**

Dear Sir/Madam

Further to your correspondence to us on the above case we wish to make the following observations/submissions:

1. The extended noise contours are only going to further result in additional noise over the village of Ratoath. Since August 2023 the town of Ratoath suffers from continuous noise between 60dB and 75dB every day. As a resident of Ratoath for nearly 20 years this disturbance has negatively affected my (and others) mental health due to in excess of 40+ flights over the town from 7:00 to 23:00 every day. This flight path has no EIS, no planning and is in violation of planning law.  
The contours being used need to be verified by an independent body not under contract by the DAA. The metrics cited above are based on the noise monitoring system deployed in Ratoath since February 2024. The metrics cited by the DAA are much lower and do not reflect the reality. *I've attached examples of the noise levels below. These are from the DAA monitoring system in Ratoath.*
2. **I'm at a loss to see why the flight paths (SID) cant turn south of the town and why they must fly directly over Ratoath? This is a simple solution which is being ignored. I plead to you to consider and direct an alternative route to DAA/AirNav as a condition of planning permission.**

When complaints are issued to the DAA by Ratoath residence against the DAA they are audited and certified as valid (or not) by the DAA which is **a clear conflict of interest** given the complaints are against the body auditing the complaints.

Attached is also a link to a petition by Ratoath residence regarding noisy flights over the town which the extended noise contours will only amplify the problem.

<https://chng.it/PYwJCqZmqL>

3. We are shocked to see that the noise contours have extended hugely into our community and that a very significant number of dwellings are now included within the noise eligibility

contours. Firstly, we note that there was no notice of this fact in any of the planning notices for this application to date. Many of our neighbours who thought they were not affected by this application are now inside these contours but yet were never publicly notified until they attended a public meeting held by St Margarets /The Ward residents' group who explained this to all of us. None of the newspaper or site notices informed the public. Secondly, the people who now know they are within the contours have not been given the opportunity to make a submission/observation as they do not qualify because they did not make a submission previously as they thought they were unaffected. An Bord Pleanála did not give a public notice of this significant additional information. The above is totally unacceptable and unjust to the communities affected.

4. We note that the correspondence from Tom Phillips & Associates refers to the ANCA Regulatory Decision regarding eligibility to the noise insulation scheme and suggest that the change in contours is as a result of their assessing that the increased area is as a result of them considering this new area which contains dwellings to having "very significant" effects. We note that the DAA have never carried out significant test criteria within any of the EIAR they have submitted and therefore they have not met with the EIA directive. This is a fundamental flaw in the assessment as the EIA directive is clear, all significant impact on environment must be identified, quantified and mitigation proposed. That has not happened to date. For areas under the North Runway this involves comparing the scenario with no flights from the North Runway to a scenario where there will be night flights. This has not been done.
5. Tom Phillips refers continuously to the regulatory decision by ANCA in his correspondence. However, what is not contained in his correspondence but is within the EIAR relating to these noise contours is that the proposal does NOT meet the Noise Abatement Objective of ANCA in future years. The proposed 2025 Scenario will fail the NAO when compared to 2019 when the total of the existing population, permitted developments and zoned developments are summed together. "2025 exceeds 2019 by 4,541 people (1533 v 6074).
6. Why have the noise contours grown. St Margarets The Ward residents carried out noise monitoring on the north runway flight path and found the noise levels to be far beyond those PREDICTED by DAA. Their noise predictions are not accurate and unfounded and they are trying to obtain permission by manipulating numbers. Why can they not submit actual noise results along the flight path which has been in operation since August 2022. The community could.
7. Reference is made to the noise zones on Fingal development plan. These noise zones must now be revised due to the proposed flight path over our area. Fingal County Council consider that there should be no residential development allowed in noise zone A as it is considered harmful to health or otherwise considered unacceptable due to the high levels of aircraft noise. However, the flight path now being operated by DAA is putting many existing residences in Noise Zone A and B which is just not acceptable from a health point of view.
8. The noise insulation grant as proposed is not fit for purpose and is totally insufficient to protect for night noise. Measurements of noise in bedrooms of housing already insulated

indicate that the noise levels exceed the recommendation in Fingal Development Plan are not sufficient to protect human health.

9. My dwelling has triple glazed windows and we are still woken every day at 6:30 by flights over the town of Ratoath. This is simply not right.
10. In summary planning is an afterthought for DAA. Their actions show that they do not respect planning legislation or decisions of An Bord Pleanála. This application must be refused.

Yours Sincerely,

Eoin Keary



Sign: \_\_\_\_\_

Date: 02/04/2024

Address: 10 Fairy house Lodge, Ratoath, CO Meath, A85ND82

## Examples of flights over Ratoath on a continuous basis.

Includes only flights exceeding 65dB over a period of a few days. More data can be seen on the DAA Webtrak application <https://webtrak.emsbk.com/dub1>

On average 30-50 flights are routed over the town everyday exceeding 65dB to 75dB











