Inspector's Report
ABP-322149-25

Development	Demolition of 2 spiral ramps/ Modifications to be made to façade
Location	Spiral Ramps, Terminal 1, Dublin Airport, Collinstown, Co. Dublin,
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F25A/0011E
Applicant(s)	DAA PLC
Type of Application	Permission
Planning Authority Decision	Refuse
Type of Appeal	First Party vs. Refusal
Appellant(s)	DCC PLC
Observer(s)	None
Date of Site Inspection	5th June 2025
Inspector	Irené McCormack

1.0 Site Location and Description

1.1. The appeal site is located within the grounds of Dublin Airport. The site comprises the two spiral ramps located to the southeast of the Terminal 1 building, adjacent to the eastern facade of T1. The proposed site is 0.357ha. in area and is accessed via Corballis Road South.

1.2. The spirals were constructed in the early 1970s as part of Terminal 1's original design. They provided access to car parking on the upper levels. The ramps currently connect ground-level facilities to Levels 40 and 50 of Terminal 1. The ramps are constructed from reinforced concrete with a white external finish and blue underside.

1.3. The base of the southernmost spiral ramp houses critical airport operations, including the main delivery bay, Airport Police offices, and the Terminal 1 energy centre. These facilities will remain. Service connections and routes passing through this area will also be maintained.

1.4. The spiral ramps are not a protected structure, nor are they listed on the National Inventory of Architectural Heritage (NIAH). There are 2 no. Protected Structures and 3 no. National Inventory of Architectural Heritage Structures within a 350m radius of the site. The closest is Corballis House (NIAH No. 11349002), situated c. 40m east of the site. Dublin Airport Church/Chapel (RPS 864, NIAH 11349001) is located 220m north of the site. The Old Central Terminal Building (RPS 612, NIAH 11349006) is located 300m northwest of the site. Dublin Airport house (SMR No. DU014-011) is located 270m southeast of the site.

2.0 Proposed Development

2.1. Planning permission was sought for the following:

- Demolition of the 2no. concrete spiral ramps which provide vehicular access to the Level 40 carpark & Level 50 external delivery bay, and all associated ancillary works, at Terminal 1 at Dublin Airport, Collinstown, Co. Dublin. The existing vehicular access to Level 40 and Level 50 will no longer be required on foot of the development permitted under application register reference F20A/0553. The proposed development will also include a modification to the architectural treatment of the eastern façade of Terminal 1, as permitted under application register reference F20A/0553.

2.2. The planning application was accompanied by inter alia a Planning Report, Architectural Design Statement, An Architectural Heritage Impact Assessment, Visual Impact Photomontages, Embodied Cardon Report, Appropriate Assessment Screening Report and EIA Screening Report.

3.0 Planning Authority Decision

3.1. Decision

Fingal County Council issued a decision to refuse permission for the following reasons:

1. The applicant has failed to evidence an appropriate rational or justification for the demolition of the spiral ramps which the planning authority consider to be of technical and architectural interest. It is therefore considered that the proposed development is contrary to Policies HCAP8, HCAP25 and Objective DMS0256 of the Fingal Development Plan 2023-2029.
2. The proposed demolition of the spiral ramps would diminish the quality of the proposed façade works granted under Reg. Ref. F20A/0553 resulting in the eastern façade of Terminal 1 being of a lesser design quality becoming visually dominant when viewed from the surroundings and would therefore be seriously injurious to the visual amenities and character of the area and contrary to Development plan objective DA026 and the proper planning and sustainable development of the area. The spiral ramps form a dominant part of the existing façade by reason of their scale, and character and their removal would materially contravene Fingal Development Plan Objective DMS0190 and Policies HCAP8, HCAP22, HCAP25.

3.1.1. Planning Reports

The Planner's Report is the basis for the Planning Authority's decision. In summary, it includes:

- The planning history, the zoning and policy objectives as set out in the Fingal Development Plan 2023-2029 and the Dublin Airport LAP 2020, applicable to the development site.
- The report sets out the contents of reports from the Conservation Officer, Architects Department and the prescribed bodies.
- The report notes the pre-planning consultation in advance of the lodgement of the

application and the view of the PA regarding appropriate justification for the development.

- The report concludes that having regard to the architectural significance of the existing spiral ramps, the content of the reports received from the Architects Department and the Conservation Department and the absence of any strong rationale or justification for the proposed demolition works, it was considered that the development fails to comply with policies HCAP8, HCAP22 of the Fingal Development Plan 2023-2029 and Objective DS01 of the Dublin Airport Local Area Plan.
- The Planning Report recommend refusal for the reason set out in section 3.1 above.

3.1.2. Other Technical Reports

Conservation Officer: The report sets out that the rationale for the demolition of these sculptural structures of 20th century technical and architectural interest is not sufficiently robust to justify their removal. The structures for part of the architectural heritage of the airport and notes section 7.7 of the Dublin Airport LAP re. design quality. The Conservation officer states that the spiral ramps to Terminal 1 are iconic monumental structures that form a distinctive part of the architectural heritage of the airport and contribute positively to the sense of place and the prosed demolition is not acceptable.

The Architects Department: The report sets out that the double spiral forms create an important landmark on approach and echo as a link between the rectilinear Terminal 1 and the curvature in the form of the new Terminal 2. The ramps are a fine and rare example of Brutalist architecture in Ireland.

Parks Department – No objection.

Environment Department Air and Nosie – No objection subject to conditions.

Environment Department Wase Enforcements – Request a Construction and Demolition Resource Waste Mmagnt Plan (RWMP).

Transportation Planning Section – No objection.

Water Services – No objection.

3.2. Prescribed Bodies

TII – No objection, refer to relevant guidelines.

Uisce Eireann – No objection.

Health and Safety Authority (HAS) – No comment as the development is outside the scope of regulations.

Aircraft Noise Competent Authority (ANCA) – Is not of the opinion that the development requires the need for a Noise-Related Action or a new Operating Restriction.

DAA -No comment but recommends consultation with IAA and AirNav Ireland.

NTA – No report received.

Irish Airline Pilots Association – No report received.

Heritage Council – No report received.

An Taisce – No report received.

Irish Aviation Authority – No report received.

3.3. Third Party Observations

The PA in their assessment state that one no. valid observations was received. Issues raised in the submissions included inter alia the following:

- The proposal is a 'knee-jerk' reaction to commercial/accommodation demands and there is no basis in long terms strategic planning contexts.
- The 'iconic spirals' are a rare example of Brutalist architecture in Ireland.
- Rational for demolition not justified.
- The application does not address what is proposed for the site following demolition and the upfront carbon that will be required.
- The proposals lacks regard to site context as the main national airport.

4.0 Planning History

In the Vicinity (Recent)

FCC Reg. Ref. F20A/0553 - Planning permission was granted for the installation of a new facade and thermal envelope to all elevations of the upper two storeys of the

original Terminal 1 building (i.e. 'Levels 40 & 50'), with enhanced and consolidated daa office space to be provided across both levels, and associated development at roof level and Level 10 (i.e. Arrivals Level). The development will include: Removal of the existing vertical concrete fins from all elevations of the building; Extension of the existing floorspace at Levels 40 & 50 to include external balcony areas; Strip out and refurbishment of the existing office floorspace at Level 40; The conversion of existing car parking to office floorspace at Level 40; The creation of an enlarged roof skylight requiring a new opening through the existing roof slab, along with a new opening through the Level 50 floor slab to create a double-height internal light well; The creation of a consolidated plant enclosure at roof level; The relocation of existing roof level plant to the consolidated plant enclosure, and the removal of redundant plant as required; The relocation of existing telecommunications antennae at roof level; bicycle storage area for staff at level 10 (at the base of existing spiral); Reconfiguration of internal floorspace at Level 10 to create staff lobby area; and all ancillary development, demolition, site works and services.

FCC Reg. Ref. F19A/0168 – Permission granted for an extension to the existing Terminal 1 baggage hall.

FCC Reg. Ref. F18A/0638 – Permission granted for enabling works to facilitate airport screening system for passengers.

To the southwest

ABP Reg. Ref 314724-22 - Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order -Metrolink. Awaiting determination. This is located fronting the site.

5.0 Policy Context

5.1. Fingal Development Plan 2023-2029

Zoning

The site is zoned 'DA' Dublin Airport. This zoning covers c. 1,024ha. and includes all the operational buildings and lands associated with the airport and runways.

Objective - Ensure the efficient and effective operation and development of the Airport in accordance with an approved Local Area Plan.

Vision -Facilitate air transport infrastructure and airport related activity/uses only (i.e. those uses that need to be located at or near the Airport). All development within the Airport area should be of a high standard reflecting the status of an international airport and its role as a gateway to the country and region. Minor extensions or alterations to existing properties located within the Airport area which are not essential to the operational efficiency and amenity of the Airport may be permitted, where it can be demonstrated that these works will not result in material intensification of land use

- The subject site is not located in either of Dublin Airport Safety Zones.
- The subject site is located within DA Noise Zone A.

Relevant policies and standards of the Fingal Development Plan 2023-2029 include:

Chapter 5 – Climate Action

Section 5.5.2.1 Climate Mitigation Actions for Buildings includes – *'Another key mitigation measure in relation to the built environment is to ensure that proposals for substantial demolition and reconstruction works can be justified having regard to the 'embodied carbon' of existing structures as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures.'*

Policy CAP8 – Retrofitting and Reuse of Existing Buildings- *Support the retrofitting and reuse of existing buildings rather than their demolition and reconstruction where possible.*

Section 5.5.4.2 relates to Construction and Demolition Waste

Policy CAP25 – Circular Economy -*Support the shift towards the circular economy approach as set out in the National Waste Policy for 2020–2025*.

Policy CAP26 – Waste Management Plans for Construction and Demolition Projects - *Have regard to existing Best Practice Guidance on Waste Management Plans for Construction and Demolition Projects as well as any future updates to these Guidelines in order to ensure the consistent application of planning requirements.*

Chapter 8 – Dublin Airport

Policy DAP1 – Dublin Airport Local Area Plan 2020 - *Continue to support Dublin Airport as a key national asset to Ireland's economic success by ensuring that all future*

development complies with the strategic aims and objectives contained within the Dublin Airport Local Area Plan, 2020 or any subsequent LAP or extension of same.

Policy DAP4 – Transitioning to a Low Carbon Economy - *Ensure that all developments comply with the Climate Action Objectives and the Circular Economy and Waste Management Objectives in the Dublin Airport Local Area Plan 2020, or any subsequent LAP or extension of same*.

Policy DAP7 – Align with Local Area Plan Objectives - *Ensure that all development within the Dublin Airport Local Area Plan lands will comply with the following Objectives of the Dublin Airport Local Area Plan, 2020, or any subsequent plan or extension of same. These include; ¨ Flood Risk Management Objectives ¨ Air Quality Objectives ¨ Sustainable Urban Drainage Objectives ¨ Archaeology Objectives ¨ Water Supply Objectives ¨ Architectural Heritage Objectives ¨ Surface Water Quality Objectives ¨ Natural Heritage Objectives ¨ Ground Water Objectives*.

Policy DAP10 – Design - *Ensure that all development within the Dublin Airport Local Area Plan lands will comply with the Design Objectives of the Dublin Airport Local Area Plan, 2020, or any subsequent LAP or extension of same*.

Objective DAO26 – Development within Dublin LAP Lands -*Ensure that all development within the Dublin Airport Local Area Plan lands will be of a high standard of design and sustainability, to reflect the prestigious nature of an international gateway airport, and its location adjacent to Dublin City.*

Chapter 10 – Heritage, Culture and Arts

Section 10.5.2 Architectural Heritage sets out that there are more '*modest or everyday structures that are part of the built heritage of the County. Through their form, scale, materials and placement they contribute positively to the urban and rural areas of Fingal, assisting in placemaking and establishing the distinctive character and architectural interest of a particular location. These structures are also of value in the embodied energy they contain, their display of traditional building craftmanship and skill in their construction, the survival within them of original or historic materials and methodologies some of which may no longer be in use*.'

This section is supported by the following policies:

Policy HCAP8 – Protection of Architectural Heritage - *Ensure the conservation,*

management, protection and enhancement of the architectural heritage of Fingal through the designation of Protected Structures and Architectural Conservation Areas, the safeguarding of designed landscapes and historic gardens, and the recognition of structures and elements with no specific statutory designation that contribute positively to the vernacular, industrial, maritime or 20th century heritage of the County.

Policy HCAP22 – Retention and Reuse of Existing Building Stock - *Seek the retention, appreciation and appropriate revitalisation of the historic and vernacular building stock, and 20th century built heritage of Fingal in both the urban and rural areas of the County by deterring the replacement buildings with modern structures and by protecting (through the use of Architectural Conservation Areas and the Record of Protected Structures and in the normal course of Development Management) these buildings where they contribute to the character of an area and/or where they are rare examples of a structure type, a distinctive piece of architecture or have an innate value*.

Policy HCAP25 – Retention of Historic Fabric - *Encourage the retention of the original or historic fabric such as windows, doors, wall renders, roof coverings, shopfronts, pub fronts and other significant features of older or historic buildings, whether protected or not.*

Chapter 14 – Development Management Standards

Section 14.16 relates to Dublin Airport.

- Objective DMSO104 – Dublin Airport LAP- *All proposed developments within Dublin Airport (DA) shall have regard to the strategic aims and objectives detailed in the Dublin Airport Local Area Plan 2020 or any subsequent LAP or extension of same.*

Section 14.19.5 relates to Heritage, Culture, Arts.

- Section 14.19.1.2 Existing Buildings/Structures states - *Where structures exist on a site their embodied carbon needs to form part of the considerations for any redevelopment to ensure the proposal adheres to sustainable development goals. Adaptive re-use and transformation of existing buildings should be the first consideration before demolition and replacement. The architectural or vernacular quality, style and materials of the buildings on the site should also form part of the evaluation as the Development Plan contains objectives to*

retain and re-use the historic building stock, vernacular structures and 20th century architecture of merit.

- Objective DMSO190 – Structures Contributing to Distinctive Character- *Where development is proposed for a site that contains a vernacular or historic building, 20th Century building of merit and/or structures that contribute to the distinctive character of the rural or urban areas of Fingal then the scheme should have regard to the direction in Table 14.26*.
- Table 14.26: Direction on Development of Vernacular Buildings or Other Built Heritage Assets

Section 14.20.14 relates to Construction and Demolition Waste Management Plans.

- Objective DMSO241 – Construction and Demolition Waste Management Plan.
- Objective DMSO242 – Guidance for Construction and Demolition Waste Management Plans.

Section 14.21 relates to Climate Action

- Objective DMSO256 – Retrofitting and Re-Use of Existing Buildings - *Support the retrofitting and reuse of existing buildings rather than their demolition and reconstruction where possible.*

5.1.1. **Dublin Airport Local Area Plan 2020 (extended)**

*The Dublin Airport LAP was formally extended by a further 5 years in March 2025.

Vision - "to facilitate and manage the sustainable growth of Dublin airport in a manner that reflects its status as Ireland's premier aviation gateway whilst safeguarding the core operational function of the airport and supporting neighbouring communities, the economy and the environment."

Section 5.18 includes –'… *Development proposals at the Airport will be required to address carbon emissions as part of planning applications for larger scale developments*.'

Section 7.2 - Enabling Infrastructure to Facilitate Airport Growth.

OBJECTIVE EI01 *All development proposals at Dublin Airport shall have regard to the requirement for environmental assessment including screening for Appropriate*

Assessment, Environmental Impact Assessment and Flood Risk Assessment in accordance with relevant legislation and guidelines.

Section 7.7– Design Quality includes -

Key design considerations for airport infrastructure include:

- creating a 'sense of place', many people see the Airport as defining a Country's character and identity not only in terminal architecture but in other parts of the infrastructure;
- creating an environment that can be used by all people, regardless of their age, disability or ability based on a universal design approach which caters for the broadest range of users from the outset and where buildings and places can be used and enjoyed by everyone; and
- a commitment to designing facilities with long-term environmental benefits.

OBJECTIVE DS01 Ensure that all development at Dublin Airport will be of high quality design and finishes to reflect Dublin Airport's status as an international gateway airport.

OBJECTIVE DS04 Require that all planning applications be accompanied by a design statement to demonstrate the key principles for Airport design as set out in Fig. 7.2 of this LAP along with the requirements of the agreed design framework.

Section 9.8 relates to Built & Natural Heritage.

OBJECTIVE AH02 Ensure as far as is consistent with the development of necessary airport facilities, the conservation of the architectural heritage within the LAP area and in the areas immediately adjoining the plan area.

5.2. National Policy

National Planning Framework *(First Revision April 2025)*

- National Strategic Outcome (NSO) 4 promotes '*careful land-use management of land-side areas to focus on the current and future needs of the airports..'*.

Climate Action Plan 2025

- The approved Climate Action Plan 2025 is the third statutory update to the plan since the Climate Action and Low Carbon Development (Amendment) Act 2021.

This plan builds upon the 2024 plan and outlines how Ireland will accelerate climate action to meet its goals of reducing greenhouse gas emissions by 51% by 2030 and achieving climate neutrality by 2050.

- The Plan acknowledges investment in emissions reduction is growing as the urgent need to act is increasingly being recognised and as the benefits of the transition to a low carbon society become clearer.
- The Climate Action Plan 2025 outlines targets for reducing embodied carbon in construction materials. For example, in 2025 it aims to decrease by 10% embodied carbon for materials produced and used in Ireland and by 2030 decrease by at least 30% embodied carbon for materials produced and used in Ireland.
- Section 13.3 Actions for 2025 includes Action No. BE/25/1 to - develop embodied carbon methodology and establish structures in line with the Energy Performance of Buildings Directive to reduce carbon in construction materials for all new buildings.

5.3. Section 28 Ministerial Guidelines

Architectural Heritage Protection Guidelines for Planning Authorities Department of Arts, Heritage, Gaeltacht 2011.

5.4. Natural Heritage Designations

The appeal site is not located within or adjacent to any European Designed sites or pNHA.

6.0 The Appeal

6.1. Grounds of Appeal – First Party

A first-party appeal has been lodged only against the decision of Fingal County Council decision to refuse planning permission for the proposed development. The grounds of appeal as summarised as follows:

- It is set out that the spirals are no longer required for operational purposes.
- The structures are not of significant heritage merit and it is noted that there was no objections from prescribed bodies.
- It is further argued that FCC never sought to protect the spirals.

- There is no impact on the setting of other Protected Structures within the airport.
- Referencing the structural report submitted, it is set out that the spirals are c. 54 years old and approaching their design life. A number of structural defects have been identified.
- The continued upkeep and maintenance of a redundant structures on a prime centrally site at the core of the airport is not justified.
- The continued development and expansion of the airport has significantly altered the spirals spatial and visual context both landside and airside.
- Much of the original brutalist expression of T1 will be removed with the on-going permitted façade works to T1 (F20A/0553). The already incongruous relationship between the ramps and T1 will be further compromised by the façade remodelling.
- Demolition provides for alignment of the eastern façade of T1 with the permitted western T1 façade. This contradicts FCC reason for refusals which states that the eastern elevation will be of lesser value.
- The development will result in little change to character and visual amenity of the receiving environment resulting in a 'neutral' change.
- It is set out that the site will be developed in the future and as such the eastern elevation on approach to T1 will not be prominent.

The appeal submission is supported by a Structural Report and Architectural Heritage Statement.

6.2. Planning Authority Response

6.2.1. A response from the Planning Authority (PA) was received on 23rd April 2025.

- The planning authority's response to the appeal sets out that while the applicant sets out a number of arguments against the refusal of permission the documentation does not provide a satisfactory rational or justification for the demolition. It is noted that the documents submitted pertaining to F25A/0011E did not indicate any fundamental structural issues with the spiral ramps.
- It is reiterated that the pre-planning consultation concluded that the demolition of the structures had not been justified and the development was therefore unacceptable in principle.

- F20A/0553 placed emphasis on design and the creation of a visually distinct facade and the integration of the brutalist ramps and modern facade treatment.
- The built heritage of the ramps is noted as per Conservation Officers report and AHIA submitted by the applicant.
- Regarding use, it is noted that the ramps are still in use and the reconfiguration of T1 permitted under F20A/0553 required the spirals to remain in place for ease of access regarding maintenance at roof level.
- Regarding NSO6, It is set out that the PA assessment is based on the documentation submitted with the application which omitted any details beyond demolition. Therefore NSO 6 has been considered as far as reasonably practicable.
- In conclusion, it states that the PA's decision to refuse permission does not hamper any current development proposal for Dublin Airport and no proposed development has been identified for the area post demolition. The PA request ABP uphold the decision of the PA.

6.3. Observations

None.

7.0 Assessment

7.1. Introduction

7.1.1. Having inspected the site and examined the application details and all other documentation on file, including all of the submission received in relation to the appeal, and having regard to relevant local/national policies and guidance, I consider that the main issues in this appeal can be addressed as follows:

- The Principle of Development
- Demolition Works /Embodied Carbon
- Refusals Reason No 1.
- Refusal Reason No. 2.
- Other Matters

Note: The Board may consider 'Embodied Carbon' a **New Issue.**

7.2. **The Principle of Development.**

Site Context

7.2.1. The Old Central Terminal Building (OCTB) at Dublin Airport was originally opened in 1940. The airport continued to grow and in 1972 a new terminal 1 building opened. The spirals were constructed as part of the new terminal building (T1) in 1972 and provided vehicular access to two upper level carparking floors above the terminal building. The 1970's design including the concrete fins of Terminal 1 and concrete finish of the spiral ramps which reflect a distinctive architectural look typical of the brutalist period. Brutalism was a movement in modern architecture, commonly applied to buildings constructed in the 1950's - 1970's. The term Brutalism comes from the French words *Béton Brut,* which refers to architectural concrete that is left unfinished after the striking of the concrete formwork.

7.2.2. While the ramps were originally designed to provide public access to the car park, they now serve as staff access to levels T40 and T50 of Terminal 1. Public access was discontinued soon after opening for security reasons during the troubles. The current configuration allows access to 41 car spaces on the upper two floors of Terminal 1.

7.2.3. Under FCC Reg. Ref. F20A/0553 the DAA secured planning permission to revamp the terminal. The permitted works include a new facade and roof incorporating the conversion of existing car parking to office floorspace at Level 40 and associated ancillary works. The concrete fins around the building are also being removed. The 2020 planning proposal did not include the removal of the spiral ramps. However, the current application sets out that due to the proposed internal re-organisation of Terminal 1's upper floors, car access to the parking areas within the terminal from these ramps is no longer required. The

7.2.4. The proposed development as set out in the applicant's scope of works relates to:

- Demolition of the Spiral Ramps: Removal of the two spirals and their associated ground-level access structures, addressing structural deficiencies and eliminating the need for continuous remedial works.
- Façade Upgrades: Architectural enhancements to Terminal 1's eastern façade, aligning with the façade upgrade permitted under Planning Application Register Reference: F20A/0553.

Zoning

7.2.5. The site is zoned 'DA' Dublin Airport. This zoning covers c. 1,024ha. and includes all the operational buildings and lands associated with the airport and runways. The zoning objective seeks to '*ensure the efficient and effective operation and development of the Airport in accordance with an approved Local Area Plan.*' The FDP 2023-2029 Chapter 13, *Land Use Zoning* states that 'minor extensions or alterations to existing properties located within the Airport area which are not essential to the operational efficiency and amenity of the Airport may be permitted, where it can be demonstrated that these works will not result in material intensification of land use.' The Dublin Airport Local Area Plan 2020 (extended) 'Vision' seeks to 'to facilitate and manage the sustainable growth of Dublin airport in a manner that reflects its status as Ireland's premier aviation gateway whilst safeguarding the core operational function of the airport and supporting neighbouring communities, the economy and the environment.' The development works would generally be consistent with Chapter 13, *Land Use Zoning.*

7.2.6. The applicant contends that the proposed development aims to support the delivery of DAA's sustainability strategy and sustainability targets through the removal of the spiral ramps and the new energy efficient architectural facade treatment of the Terminal 1. It is set out that the current configuration allows access to 41 car spaces on the upper two floors of Terminal 1 and theses floors are currently open to the atmosphere with all the unsustainable thermal issues this brings to the building. It is argued that this upgrade will enhance the terminal's visual appeal and improve the thermal performance of the building, reducing energy consumption and the environmental impact of Terminal 1, and will provide a reduction in maintenance costs across the entire site.

7.2.7. As regards the design of the proposed façade works, I note that this is generally consistent with the permitted F20A/0553 façade works and is therefore acceptable in principle.

<u>Conclusion</u>

7.2.8. I am satisfied that the proposed development would be consistent with the land-use zoning objectives DA as set out in the Fingal Development Plan 2023-2029 subject to detailed consideration below.

7.3. Demolition Works /Embodied Carbon

7.3.1. From a climate action/energy perspective, I acknowledge the 'embodied carbon' implications associated with the proposed demolition of the spiral ramps. Section 5.5.2.1 *Climate Mitigation Actions for Buildings* of the FCDP states that '*proposals for substantial demolition and reconstruction works can be justified having regard to the 'embodied carbon' of existing structures as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures..'* In addition Section 5.18 of Dublin Airport LAP includes –'… *Development proposals at the Airport will be required to address carbon emissions as part of planning applications for larger scale developments*.'

7.3.2. Demolition phasing is described in the structural report (D21122-ATK-DT1-XX-XXX-RP-S-0006). In addition, the application was accompanied by an Embodied Carbon Report. The assessment includes a number of assumptions to conform to standards and guidance documents and includes a 15% contingency margin. Section 3 of the report details the Embodied Carbon Assessment. Following the International Cost Management Standards (ICMS) 3, Fig 1 below presents a comparison of the three main construction elements and demonstrate that less than 5% of the total development upfront carbon impacts are attributed to the facade works.

Fig 1. - Breakdown of Upfront Carbon (source: Applicants Embodied Carbon Report)

Building Category	Upfront Carbon (A1-A5) $kgCO_2$	Upfront Carbon (A1-A5) %
01 Demolition, site preparation and formation *(spirals demolition)*	121,441	51%
02 Substructure	0	-
03 Structure	0	-
04 Non-structural works *(façade addition)*	10,343	4%
05 Services and equipment	0	-
06 Surface and underground drainage	0	-
07 External and ancillary works	0	-
08 Preliminaries/constructors' site overheads *(site impacts)*	107,525	45%
TOTAL	**223,469**	**100%**

7.3.3. The total embodied carbon form the demolition of the spirals as identified in section 3.1 of the applicants Embodied Carbon Report is set out in Fig. 2 below and an itemised breakdown in Fig. 3. The figures have been calculated in accordance with

RICS guidance.

Fig. 2 -Total Embodied Carbon form Demolition of the Spiral Ramps

Lifecycle Stage	kgCO2e
A5.1 Pre-Construction Demolition	228,966

Fig. 3 – Itemised breakdown of Embodied Carbon Impacts form Demolition of the Spiral Ramps

Element	kgCO2e
Site Impacts	107,525.00
Concrete Waste Transport	110,374.70
Concrete Waste Processing	2,543.80
Concrete Waste Disposal	232.30
Steel Rebar Waste Transport	7,234.65
Steel Rebar Waste Processing	1,054.55
Steel Rebar Waste Disposal	1.15

7.3.4. The report notes that while the result of 228,966kgCO_2e equates to approximately 137 kgCO_2e/m^2 of demolition area (1660m^2), is above typical high-level assumptions (such as the RICS Guidance and Greater London Authority (GLA) Whole Life Carbon Guidance), these standards are based on the demolition of buildings in dense urban environments and do not account for the removal of infrastructure scale and large reinforced concrete structures such as the spiral ramps. The assessment includes a number of recommendations to reduce carbon emissions including reducing transport impacts by processing of the concrete on site or close proximity to the site and reusing the crushed concrete aggregates with the site.

7.3.5. I refer the Board to the Outline Construction and Environmental Management Plan submitted and section 13 – Preliminary Waste Management relating to construction and demolition waste management. The recommended waste management alleviation for the construction phase of the proposed development is proposed to be undertaken in accordance with current legal and industry standards and the requirements of the 'Best Practice Guidelines on the Preparation of Waste Management Plans for Construction & Demolition Projects (DoEHLG, 2021)'. Implementation of the Plan will ensure effective waste management and minimisation, reuse, recycling, recovery, and disposal of waste material generated during the construction phase of the project. All waste material generated during demolition will be removed offsite to an appropriately permitted or licenced waste disposal /recovery facility in accordance with all relevant waste management legislation. Mixed C&D waste will be segregated on site and any residual mixed C&D waste will be collected in containers specifically for mixed C&D waste; these will be removed offsite for subsequent separation and disposal at an authorised waste disposal facility.

7.3.6. I refer the Board to table 5 of the OCMP submitted as highlighted in Figure 4 below which sets out an *Estimated on and off-site reuses, recycle and disposal rates for demolition waste*.

Fig. 4 – *Extract from OCMP Table 5*

Table 5 - Estimated on and off-site reuse, recycle and disposal rates for demolition waste

EWC Code	Waste Description	Estimated quantity (tonnes)	Reuse		Recycle/ Recovery		Disposal	
			%	Tonnes	%	Tonnes	%	Tonnes
17 04 05	Steel, within slabs, beams, walls & columns	430			99			
17 01 01	Concrete, within spirals, ramps & link bridges	6560			100			
	Total	**6990**						

7.3.7. Fig 4. above establishes that the demolition works will generate 6,560 tonnes of concrete waste and 430 tonnes of steel and that 99% of steel and 100% of concrete waste will be recycled or recovered. Further to the above the Contractor's C&DWMP will be required to detail the intended practice for the management of waste arising from the construction and demolition processes and in particular the management of hazardous waste and recyclable materials. The applicant is obliged to ensure that the waste contractors engaged by construction contractors are legally compliant with respect to waste transportation, recycling, recovery and disposal. This includes the requirement that a contactor handle, transport and recycle/recover/dispose of waste in a manner that ensures that no adverse environmental impacts occur as a result of any of these activities and to reduce the potential embodied carbon implications. These measures can be reinforced through the provision of an appropriately worded planning condition should the Board be minded to grant planning permission.

7.3.8. I acknowledge the contents of the documents submitted by the applicant including the percentage estimated with respect to recycle/recovery of demolition waste. I further note the appeal response which sets out that lower embodied carbon emissions are a more likely scenario as the current estimate in the Embodied Carbon Assessment Report assumes all concrete is transported a distance of 50kms offsite. While this is noted by the applicant in response to the appeal, no details have been submitted in this regard and it is difficult to see how processing of the concrete on site or in close proximity to the site and reusing the crushed concrete aggregates within the site can occur on this tight site located between T1 and T2 and in what context the concrete can be reused given that no development has been proposed beyond demolition.

7.3.9. In addition to the above, the structural report submitted does not identify any significant structural deficiencies only 'superficial defects' in the spiral ramps to justify demolition, the fact that maintenance works is required is not a significant consideration. Therefore the applicant's argument about compliance with the NPF (NSO6) to promote '*careful land-use management of land-side areas to focus on the current and future needs of the airports'* updated to National Strategic Outcome (NSO) 4 (NPF First Revision April 2025) is a mute argument in this instance, in my opinion.

7.3.10. The Board will note that the matter of justification for demolition as regards the built heritage and visual amenity of the spiral ramps was raised by the PA in refusal reason

no. 1 and no. 2 respectively, I will address these matters separately in section 7.4 and 7.5 below.

Conclusion

7.3.11. From a climate action/energy perspective, the Board will note the 'embodied carbon' implications associated with these demolition works and the applicant's own acknowledgment that the embodied carbon impact is above 'typical high-level assumptions' and having regard to the fact that the existing spiral ramps are structurally sound and the proposed demolition is not required to facilitate any proposed development, It is considered that the applicant has failed to justify demolition in accordance with Section 5.5.2.1 *Climate Mitigation Actions for Buildings* of the FCDP 2023-2029 in so far as demolition would result in significant carbon emissions and would fail to support the transition to a 'low carbon society'. Permission should be refused for this reason.

I draw the Boards attention to the pre-planning consultation with FCC in advance of this application where the applicant was advised the demolition of the structures had not been justified and the development was therefore unacceptable in principle and the fact that an Embodied Carbon Report accompanied the planning application. Notwithstanding, the Board may consider this a new issue and the Board may wish to seek the views of the parties.

7.4. Refusal Reason No .1

7.4.1. Refusal reason no. 1 states that the applicant has failed to provide evidence and appropriate rational or justification for the demolition of the spiral ramps which the planning authority consider to be of technical and architectural interest. It is therefore considered that the proposed development is contrary to Policies HCAP8, HCAP25 and Objective DMS0256 of the Fingal Development Plan 2023-2029.

7.4.2. The Board will note Policy HCAP8 relates to protection of architectural heritage including the 'recognition of structures and elements with no specific statutory designation that contribute positively' to the heritage of the County. Policy HCAP25 relates to the retention of historic fabric including 'other significant features of older or historic buildings, whether protected or not' and Objective DMSO256 – *Retrofitting and Re-Use of Existing Buildings* seeks to support the retrofitting and reuse of existing buildings rather than their demolition and reconstruction where possible.

7.4.3. As regards justification for demolition, the applicant argues that that the spirals are no longer required for operational purposes, the structures are not of significant heritage merit and that FCC never sought to protect the spirals and their removal will maximise the use of underutilised space. In response the PA set out that while the applicant sets out a number of arguments against the refusal of permission the documentation does not provide a satisfactory rational or justification for the demolition and any alternative use for the space.

7.4.4. The spiral ramps are not a Protected Structure, nor are they listed on the National Inventory of Architectural Heritage (NIAH). However, I refer the Board to the report from the FCC Conservation Officer which sets out that that the spiral ramps to Terminal 1 are iconic monumental structures that form a distinctive part of the architectural heritage of the airport and contribute positively to the sense of place and the 'spiral sculptural structures of 20th century are of technical and architectural interest and the rationale for the demolition is not sufficiently robust to justify their removal'.

7.4.5. The application was accompanied by an Architectural Heritage Impact Assessment. The AHIA sets out that the spiral ramps are constructed of in situ concrete formed with glass reinforced plastic moulds in a symmetrical arrangement, one ramp for incoming traffic and the other for outgoing traffic. The ramps are cantilevered from a central spine. The cantilever of the ramps extends to 6.4m form the edge of the spine to the edge of the guarding. The upper two levels of the spirals bridge over onto the carparking levels.

7.4.6. The AHIA sets out that in order to justify the investment required to retain and maintain the spiral ramps, a clear use should be identified. However, the sloped surfaces of the car ramp means that the structure is not readily adaptable to another use. It is further argued that retaining the ramps for aesthetic purposes would be questionable as the ramps would be visually isolated from the other adjoining structurers and could be considered to contribute to the clutter of the airport complex and this would only be justified if the ramps were recorded as protected structures, which they are not. The report notes that while the scale and expressiveness of the concrete treatment and the planning formwork are impressive, the use of different types of concrete finishes results in a somewhat incongruous visual relationship between the spiral ramps and the T1 building. However, the AHIA does states that the ramps are of some architectural interest with the primary being technical.

7.4.7. As regards, the reference to the use of different types of concrete in T1 and the spirals, the Board will not that the facade works to T1 (F20A/0553) provide for the removal of the T1 concrete fins. Therefore, the spirals will be the only remaining brutalist element of the1970's T1 and the new contrast design of T1 will serve to highlight same, in my opinion and this is not an unsatisfactory result.

7.4.8. With respect to the built heritage merit of the spirals, I refer the Board to the Architectural Heritage Protection Guidelines, 2011 section 2.5.4 which states that the Act (section 51 (1), 2000 Act) requires that a protected structure be of special interest under one or more of the following categories: a) Architectural; b) Historical; c) Archaeological; d) Artistic; e) Cultural; f) Scientific; g) Technical; h) Social. As regards the architectural heritage of the spirals, the AHIA submitted by the applicant acknowledges the technical merits of the structure. Similarly, the Conservation Officer considers the structure to be of technical and architectural interest. Therefore, while the spirals are not a Protected Structure, it can be concluded that the spirals have a built heritage status in line with the criteria identified in the Architectural Heritage Protection Guidelines. In my opinion, the spirals are of technical and architectural merit by virtue of their brutalist design, associated concrete construction and their unique architectural form and shape which reflect a distinctive feature adjacent to the T1 building. In the context of section 4.3 above and in the absence of any development been identified for the area post demolition their demolition is not justified. I agree with the PA that on the basis of the established architectural merit of the spirals, the applicant has not justified their demolition and as such the proposed development would be contrary to Policies HCAP8 and HCAP25 and of the Fingal Development Plan 2023-2029.

7.4.9. With respect to Objective DMS0256 -Retrofitting and Re-Use of Existing Buildings, I note the documents submitted by the applicant outline that the spirals will no longer be required to access the car parking in T1 and with 'no apparent use available' the ramps will further degrade. In the context of Objective DMS0256, I do not consider the applicant has appropriately addressed and/or explored potential alternative uses for the spirals in any context save to say that they will no longer be required. I further note that this is contrary to F20A/0553 which required the spirals to remain in place for ease of access regarding maintenance at roof level. I do not consider this sufficient in light of the built heritage recognition of the spirals as set out above.

Conclusion

7.4.10. Having regard to the documentation on file, I agree with the PA that planning permission should be refused as the applicant has failed to provide evidence and appropriate rational or justification for the demolition of the spiral ramps which are considered to be of technical and architectural interest. It is therefore considered that the proposed development is contrary to Policies HCAP8, HCAP25 and Objective DMS0256 of the Fingal Development Plan 2023-2029.

7.5. Refusal Reasons No. 2

7.5.1. Refusal reason no. 2 states that the proposed demolition of the spiral ramps would diminish the quality of the proposed façade works granted under Reg. Ref. F20A/0553 resulting in the eastern façade of Terminal 1 being of a lesser design quality becoming visually dominant when viewed from the surroundings and would therefore be seriously injurious to the visual amenities and character of the area and contrary to Development plan objective DA026 and the proper planning and sustainable development of the area. The spiral ramps form a dominant part of the existing façade by reason of their scale, and character and their removal would materially contravene Fingal Development Plan Objective DMS0190 and Policies HCAP8, HCAP22, HCAP25.

7.5.2. Objective DAO26 relates to development within Dublin LAP Lands and the requirements to ensure all development will be of a high standard of design and sustainability, to reflect the prestigious nature of an international gateway airport, and its location adjacent to Dublin City. Objective DMSO190 – *Structures Contributing to Distinctive Character* sets out that 'w*here development is proposed for a site that contains a vernacular or historic building, 20th Century building of merit and/or structures that contribute to the distinctive character of the rural or urban areas of Fingal then the scheme should have regard to the direction in Table 14.26'*. Table 14.26: *Direction on Development of Vernacular Buildings or Other Built Heritage Assets* includes inter alia– '*Development proposals should seek to retain and incorporate existing older buildings of merit or character be they vernacular, historic or 20th century structures…*'.

7.5.3. The Board will note that FCC refusal reason no. 2 includes reference to policies HCAP8 and HCAP2 which relate to built heritage (see 7.4 above) and similarly Policy

HCAP22 relates to the retention and reuse of existing building stock an seeks' *the retention, appreciation and appropriate revitalisation of the historic and vernacular building stock, and 20th century-built heritage of Fingal … where they contribute to the character of an area and/or where they are rare examples of a structure type, a distinctive piece of architecture or have an innate value*.'

7.5.4. In the first instance, the Board will note the policy overlap with refusal reason no. 1. Reason no. 2 effectively relates to the visual impact on the character of the area as a result of the loss of the spiral ramps and their associated built heritage on the character of the receiving environment.

7.5.5. As regards the impact of the proposed development on the permitted T1 façade works granted under Reg. Ref. F20A/0553 and the resultant impact on visual amenity. With respect to Reg. Ref. F20A/0553, I note the façade works were permitted with the retention and integration of the spirals into the design concept. As part of F20A/0553, the applicant placed emphasis on design and the creation of a visually distinct facade and the integration of the brutalist ramps and modern facade treatment. The applicant now argues that much of the original brutalist expression of T1 will be removed with the on-going permitted façade works to T1 (F20A/0553) and that the already incongruous relationship between the ramps and T1 will be further compromised by the façade remodelling leaving the ramps isolated, adding to the visual clutter in the airport. It is further argued that the demolition provides for alignment of the eastern façade of T1 with the permitted western T1 façade and as such this contradicts FCC reason for refusals which states that the eastern elevation will be of lesser value.

7.5.6. I have already established that the spirals have a built heritage status (section 7.4 above) and I am satisfied that the spirals are sufficiently unique and distinctive so as to stand alone independent of any former architectural relationship with T1. I further note that the Architects Dept. of FCC set out that the double spiral forms create an important landmark on approach and echo as a link between the rectilinear T1 and the curvature in the form of the new T2. I would agree.

7.5.7. Regarding the applicant's argument that FCC contradict themselves with reference to the developments eastern elevation being of 'lesser value' as a result of the proposed demolition, it is clear that FCC are referring to the loss of the spirals and not the proposed continuation of the T1 façade upgrades on the eastern elevation. The

demolition the spirals will expose the incremental built forms to the rear of the site which are industrial in form and finish with limited architectural context particularly when combined with the energy centre infrastructure and the T1 aeration system vertical stacks. The demolition of the spirals will expose this infrastructure and the poor architectural context to the rear of the spirals, the impact of which will have a negative visual impact on the approach to T1 in all directions. I refer the Board to Plate 1 – Viewpoint 1 and Plate 2 -Viewpoint 2 of the applicants' appeal response. For the reason set out above and contrary to the applicants LVIA, I consider the demolition of the spirals will reduce the landscape value of the receiving environment in and around T1 and the magnitude of change would have detrimental visual impact. Accordingly, in my opinion, the proposed demolition of the spirals would diminish the visual impact of T1 and would be contrary to objective DAO26 to ensure all development will be of a high standard to reflect the prestigious nature of an international gateway airport, objective DMSO190 and policies HCAP8, HCAP22, HCAP25 as they relate to the retention of 20th Century building of merit and/or structures that contribute to the distinctive character of an area of the FDP 2023-2029. Permission should be refused for this reason.

7.5.8. The application was accompanied by a series of drawings and photomontages which demonstrate the visual impact of the development including in a wider site in context. As regards, the wider visual amenities of the area, I agree with the applicant that the wider airport complex has been subject to incremental development over that last number of decades which has eroded some the sites context when viewed at a distance from the site. In a wider site context, I am satisfied that the demolition of the spirals will not result in any significant negative visual impact having regard to the established built forms in and around the approach to the airport which screen the spirals for the most part. I have no concerns in this regard.

Conclusion

7.5.9. The spiral ramps are part of the architectural heritage of Dublin Airport and represent a dominate and recognisable feature adjacent to T1. Therefore, I consider that their loss would be contrary to objective DMSO190 and policies HCAP8, HCAP22, HCAP25 as they relate to the retention of 20th Century building of merit and/or structures that contribute to the distinctive character of an area of the FCDP 2023-2029. In addition, I consider their removal would expose the crude architectural detailing of the existing

structures to the rear of the spirals and expose prominent vertical infrastructure elements currently screened by the spirals and as such would erode the visual amenity of the area and the quality of built the environment immediate to the site and would result in a detrimental impact of the character of the area and as such would be contrary to objective DAO26 to ensure all development will be of a high standard to reflect the prestigious nature of an international gateway airport.

Other Matters

Material Contravention

7.5.10. I draw the Boards attention to the PA's reason for refusal no. 2 which states that the removal of the spirals would materially contravene Fingal Development Plan Objective DMS0190 and Policies HCAP8, HCAP22, HCAP25. Objective DMS0190 and Policies HCAP8, HCAP22, HCAP25 all relate to the protection of built heritage including the recognition of buildings that are not Protected Structures. Section 10.5.2 *Architectural Heritage* of the FCDP 2023-2029 establishes that for built heritage that is not covered by statutory designations, there is national and international policy advocating its retention and revitalisation and the Council supports this through specific Development Plan policy and objectives.

7.5.11. Having regard to the above, Objective DMS0190 requires the applicant to 'have regard to table 14.26' and table 14.26 sets out that development proposals 'should seek to retain and incorporate' existing older buildings. The text sets out that the applicant 'should have regard to' and 'should seek to incorporate'. Similarly, policies HCAP8, HCAP22 and HCAP25 incorporate similar wording, Policy HCAP8 - *Ensure the conservation, management, protection and enhancement …',* Policy HCAP22 - *Seek the retention, appreciation and appropriate revitalisation of …',* Policy HCAP25 - *Encourage the retention of ….'.* I am satisfied having reviewed the text of the objective and policies that the text is not inflexible and provides for works to structures considered to be of built heritage significance subject to justification having regard to the circumstances of each particular development, on a case-by-case basis. The text of objective DMS0190 and policies HCAP8, HCAP22, HCAP25 relate to general protection of built heritage in Fingal and if applied in a very specific manner and deemed to materially contravene the Development Plan would preclude development to any structure considered to be of any merit. Therefore, while I consider the

demolition of the spirals to be contrary to objective DMS0190 and policies HCAP8, HCAP22, HCAP25 of the FDP 2023-2029, I do not consider their demolition to be a material contravention of the FDP 2023-2029.

8.0 Water Framework Directive Screening

8.1.1. The impact of the proposed development in terms of the WFD is set out in Appendix C of this report.

8.1.2. The proposed project lies within the Dublin Groundwater Body (IE_EA_G_008) (EPA, 2024). Dublin Groundwater Body has 'good' water quality status under the WFD for the 2016 – 2022 monitoring period with its risk of failing to achieve the relevant WFD objectives by 2027 is 'under review' (EPA, 2023). Groundwater vulnerability rating beneath the site is classified as 'low' groundwater vulnerability (GSI, 2025)

8.1.3. All stormwater drainage within Dublin airport lands is located within the Water Framework Directive (WFD) Mayne sub-catchment (SC_010 09_17) and/or the Broadmeadow sub-catchment (SC_010 08_3). The surface water drainage network of the airport is further subdivided into eight distinct drainage units. The drainage network within these catchments' outfall into eight separate watercourses which are identified as the Cuckoo stream, the Wad stream, Forrest Little stream, Kealy's stream, Barberstown stream, the Santry River, the Ward River and the Mayne River.

8.1.4. The closest watercourse is the Cuckoo Stream (MAYNE_010/ EPA Code: IE_EA_09M030500) located ca. 450m south of the site. The Cuckoo Stream is reported by the EPA (2023) as having 'poor' Water Framework Directive (WFD) status and is 'at risk' of failing to achieve relevant WFD status by 2027. The Cuckoo Stream outfalls into the Mayne River (EPA Code: IE_EA_09M030500) ca. 4.2km downstream and discharges into Baldoyle Bay SAC (site code 000199). The Mayne Estuary is reported as having 'moderate' quality status under the (WFD) for the 2016 – 2022 monitoring period with its risk of failing to achieve the relevant WFD objectives by 2027 is 'under review' (EPA, 2024).

8.1.5. The main pressure identified is industrial. Surface water drainage in the vicinity of the location of the proposed works, discharges downstream of the Airport, to the Cuckoo stream (MAYNE_010/ EPA Code: IE_EA_09M030500). As regards surface water management during proposed demolition contractors will be required to take on board the recommendations outlined in the DAA 'Construction Contractors Health & Safety

and Environmental Rules for working on daa Infrastructure Manual' and the 'Airport Direction: Environment and Pollution' document in relation to water management. It will be the contractor's responsibility to implement temporary surface water drainage management systems including surface water runoff controls, if required, in order to ensure that the demolition works have no adverse impacts on water quality within the receiving environment. Therefore, strict adherence to best practice is required to prevent the risk of pollution during all work stages. General pollution prevention measures are set out in the Outline CEMP accompanying this application.

8.1.6. The proposed development includes the provision of standard practice construction and operational measures. Therefore, in accordance with Appendix C of this report, I conclude on the basis of objective information, the proposed development will not result in a risk of deterioration on any waterbody (rivers, lakes, groundwaters, transitional and coastal) either qualitatively our quantitatively or on a temporary basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

9.0 Environmental Impact Assessment Screening

9.1.1. The application addresses the issue of EIA within an EIA Screening Report that contains information to be provided in line with Schedule 7A of the Planning Regulations. I have had regard to same in this screening assessment. The EIA Screening Report identifies and describes adequately the direct, indirect, secondary and cumulative effects of the proposed development on the environment.

9.1.2. With regard to EIA thresholds, Class (10)(b) of Schedule 5 Part 2 of the Planning and Development Regulations 2001 (as amended) provides that mandatory EIA is required for the following classes of development:

• Urban development which would involve an area greater than 2 ha in the case of a business district, 10 ha in the case of other parts of a built-up area and 20 ha elsewhere. (In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)

9.1.3. Class 13 of Schedule 5 relates to Changes, extensions, development and testing.

(a) Any change or extension of development which would: -

(i) result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, and

(ii) result in an increase in size greater than-

- 25 per cent, or
- an amount equal to 50 per cent of the appropriate threshold,

whichever is the greater.

(b) Projects in Part 1 undertaken exclusively or mainly for the development and testing of new methods or products and not used for more than 2 years.

(c) Any change or extension of development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, which would result in the demolition of structures, the demolition of which had not previously been authorised, and where such demolition would be likely to have significant effects on the environment, having regard to the criteria set out under Schedule 7.

9.1.4. Class 14 of Schedule 5 relates to works of demolition carried out in order to facilitate a project listed in Part 1 or Part 2 of this Schedule where such works would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.

9.1.5. Class 15 of Schedule 5 relates to any project listed in Part 2 of Schedule 5 which does not exceed a quantity, area or other limit specified in Part 2 in respect of the relevant class of development, but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.

9.1.6. A detailed description of the development is outlined in section 3 of the report. In summary, it is proposed to demolish the 2no. car park access spiral ramps and associated ground level access ramps adjacent to and attached to the eastern elevation of Terminal 1. The site has an overall area of c. 0.36ha and is located on lands zoned DA- Dublin Airport. The predominant use in the area is related to airport activity including terminal buildings, carparking and ancillary uses. However, the site size is significantly below the applicable threshold of 2 ha for a ‘business district’.

9.1.7. As outlined above, the criteria at Schedule 7 to the Planning and Development Regulations 2001 (as amended) are relevant to the question as to whether the proposed sub-threshold development would be likely to have significant effects on the

environment that should be the subject of environmental impact assessment. I would note that the requirement for EIA has not been suggested by any of the submissions or reports connected to the application and appeal.

9.1.8. The site forms part of the grounds of Dublin Airport and is largely surrounded by buildings relating to the airport use. The demolition works and associated façade upgrade to T1 will not have an adverse impact in environmental terms on surrounding land uses.

9.1.9. The proposed development will not increase the risk of flooding within the site, and it would not give rise to significant use of natural resources, the production of waste, pollution, nuisance or a risk of accidents. The spiral ramps are not a protected structure, nor are they listed on the National Inventory of Architectural Heritage (NIAH). There are 2 no. Protected Structures and 3 no. National Inventory of Architectural Heritage Structures within a 350m radius of the site. The AHIA accompanying the application determined no significant detrimental impact on the Protected Structures or the NIAH structures as a result of the development. The site does not support habitats or species of conservation significance, as highlighted in the AA, and this EIA Screening Assessment submitted with the application. In addition the outline CEMP sets out that a pre-demolition asbestos survey will be carried by a licenced contractor. If asbestos containing material is identified at the site, this will be removed and disposed of by a licenced asbestos removal contractor. The nature and the size of the proposed development alongside this existing development remains below the applicable class 10(b) thresholds for EIA.

9.1.10. The reports submitted with the application address a variety of environmental issues and the environmental impacts of the proposed development. The reports demonstrate that, subject to the various recommended construction and design-related mitigation measures, the proposed development would not have a significant impact on the environment. I have had regard to the characteristics of the site, the location of the proposed development, and the type and characteristics of the potential impacts. Having regard to the Schedule 7A information, I have examined the sub-criteria and all submissions, and I have considered all information that accompanied the application and appeal. In addition, noting the requirements of Article 103(1A) (a) of the Planning Regulations, the first party has provided a statement indicating how the available results of other relevant assessments have been taken into account on

the effects of the project on the environment carried out pursuant to European Union legislation other than the EIA Directive

9.1.1. Under the relevant themed headings, the EIA screening information prepared by the first-party appellant addresses the implications and interactions of the proposed development and concludes that the development would not be likely to have significant effects on the environment (Section 5, Table 5-1, Table 5-2 and Table 5-3). I am satisfied that all other relevant assessments have been identified for the purposes of screening for EIA. I have had regard to all of the reports detailed above and I have taken them into account in this assessment, together with the Strategic Environmental Assessment of the Development Plan. I am satisfied that the information required under Article 103(1A) (a) of the Planning Regulations has been submitted.

9.1.2. I have completed an EIA screening assessment of the proposed development with respect to all relevant considerations, as set out in Appendix B to this report. I am satisfied that the location of the project and the environmental sensitivity of the geographical area would not justify a conclusion that the proposed development would be likely to have significant effects on the environment. The proposed development does not have the potential to have effects that would be rendered significant by their extent, magnitude, complexity, probability, duration, frequency or reversibility, and this opinion extends to my conclusion that the proposed development is subthreshold in terms of the mandatory submission of an EIA based on class 14 of Part 2 to Schedule 5 of the Planning Regulations. In these circumstances, the application of the criteria in Schedule 7 of the Planning Regulations to the proposed subthreshold development demonstrates that it would not be likely to have significant effects on the environment and that an EIA is not required should a decision to grant planning permission for the project be arrived at. This conclusion is consistent with the EIA screening information submitted with the subject application and the opinion of the Planning Authority. A Screening Determination can be issued confirming that there is no requirement for an EIA Report to be prepared for the project based on the above considerations.

10.0 **Appropriate Assessment**

10.1.1. I refer the Board to Appendix A -AA Screening Determination.

Screening Determination Conclusion

I am satisfied the potential for significant effects, as a result of surface waters

generated during the demolition works, on the qualifying interests of the applicable Natura 2000 site Baldoyle Bay SAC (site code 000199) and the Baldoyle Bay SPA (site code 004016) can be excluded having regard to the following:

- There is no terrestrial or direct hydrological or groundwater pathway between the development site and any Natura 2000 site.
- Whilst hydrological connectivity from the project site exists to this habitat, the connectivity is weak and there is no potential for the proposed works to result in likely significant effects on the 8.1km downstream habitat via the Cuckoo stream given the levels of potential contaminants the proposed project could potentially generate and given the dilution, dispersal and attenuation that would occur within the 8.1km of intervening watercourse.
- All surface water drainage will continue to discharge to the existing drainage network at the existing discharge points. As there are no changes to the buildings surface water drainage rates or drainage outfalls, no significant impacts are anticipated from drainage flow rates on the Cuckoo stream as a result of the proposed project. As such, no significant impacts from drainage flow rates are anticipated on Baldoyle Bay SAC/SPA following completion of the proposed project.
- Baldoyle SPA is designated for a range of wintering waders and wildfowl that frequent coastal estuaries and is also designated for the wetlands that support these species. There is no direct overlap between the proposed project and the SPA. The proposed project is sufficiently remote that there is no risk of direct disturbance to waders and wildfowl using the SPA.
- Following completion of the proposed project, no impacts on European sites are considered likely as there will be no changes to surface water drainage which is the only viable pathway from the proposed project to the downstream SAC and SPA associated with Baldoyle Bay.

10.1.2. I am further satisfied the potential for significant effects, as a result of surface waters generated during the demolition works on the qualifying interests of any Natura 2000 sites can be excluded having regard to the following:

- The distance separating the site from Natura 2000 sites;
- Lack of direct hydrological pathway or biodiversity corridor link to the conservation

sites;

- The dilution effect with other surface runoff;
- No additional surface water drainage discharge volumes or significant increases in flows to existing drainage network will occur as a result of the proposed project;
- The works do not involve the use of liquid or contaminating materials and as such there will be no likely pollution of the airport's surface water drainage network from potentially contaminating materials;
- The localised nature and limited scale of the proposed development.

10.1.3. No habitat fragmentation to any Natura 2000 site is predicted and there is no potential for impacts on the qualifying interests of Natura 2000 sites due to noise and other disturbance impacts during demolition phase given the level of separation between the sites.

10.1.4. It is evident from the information before the Board that on the basis of the nature and scale of the proposed development on serviced lands, the nature of the receiving environment which comprises the landside operations of Dublin Airport, the distances to the nearest European sites and the hydrological pathway considerations, submissions on file, the information submitted as part of the applicant's Appropriate Assessment Screening report that, by itself or in combination with other development, plans and projects in the vicinity, the proposed development would not be likely to have a significant effect on Baldoyle Bay SAC (site code 000199) and the Baldoyle Bay SPA (site code 004016) or an European Site in view of the conservation objectives of such sites, and that a Stage 2 Appropriate Assessment is not, therefore, required.

10.1.5. In reaching my screening assessment conclusion, no account was taken of measures that could in any way be considered to be mitigation measures intended to avoid or reduce potentially harmful effects of the project on any European Site. In this project, no measures have been especially designed to protect any European Site and even if they had been, which they have not, European Sites located downstream are so far removed from the subject lands and when combined with the interplay of a dilution affect such potential impacts would be insignificant. I am satisfied that no mitigation measures have been included in the development proposal specifically because of any potential impact to a Natura 2000 site.

11.0 Conclusion and Recommendation

It is recommended that the proposed development is refused for the reasons and considerations as set out below.

12.0 Reasons and Considerations

1. The Structural Report accompanying the application did not identify significant structural concerns to warrant demolition of the spiral ramps and in the absence of any proposal for the development of the site subsequent to demolition, it is considered that the applicant has failed to justify demolition in accordance with Section 5.5.2.1 *Climate Mitigation Actions for Buildings* of the Fingal Development Plan 2023-2029 in so far as demolition would result in significant embodied carbon emissions and would fail to support the transition to a 'low carbon society' as supported by the Climate Action Plan 2025. The development is therefore contrary to the proper planning and sustainable development of the area.

2. The spirals were constructed as part of the new terminal building (T1) in 1972 and their concrete finish reflect a distinctive architectural look typical of the brutalist period. Notwithstanding the fact that the spirals are not a Protected Structure, it is considered that the spirals are of technical and architectural merit by virtue of their brutalist design, associated concrete construction and their unique architectural form and shape which reflect a distinctive feature adjacent to the T1 building. Therefore, in the absence of evidence and appropriate rational or justification, the proposed demolition of the spiral ramps is considered contrary to Policies HCAP8, HCAP25 and Objective DMS0256 as they relate to protection of architectural heritage including the 'recognition of structures and elements with no specific statutory designation' of the Fingal Development Plan 2023-2029. The development is therefore contrary to the proper planning and sustainable development of the area.

3. The spiral ramps are part of the architectural heritage of Dublin Airport and form a visually dominant part of the existing approach to Terminal 1 by reason of their scale and character. Objective DAO26 of the Fingal Development Plan 2023-2029 seeks to ensure all development will be of a high standard to reflect the prestigious nature of an international gateway airport. It is considered that the demolition of the spiral ramps would dimmish the visual amenity on approach to T1 and expose the

crude architectural detailing of the existing structures to the rear of the spirals including the prominent vertical infrastructure elements of the energy centre currently screened by the spirals and as such would erode the character of the area and the quality of built the environment on approach to the site and combined with the loss of distinctive spirals, which the Board consider to be of architectural and technical interest, would reduce the visually amenity of the area and would be contrary to Objective DMS0190 and Policies HCAP8, HCAP22, HCAP25 of Fingal Development Plan 2023-2029.

I confirm that this report represents my professional planning assessment, judgement and opinion of the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

_____

Irené McCormack
Senior Planning Inspector
23rd June 2025

Appendix A – Appropriate Assessment Screening Determination

Screening for Appropriate Assessment Screening Determination
1: Description of the project I have considered the Dublin Airport spirals demolition in light of the requirements of S177U of the Planning and Development Act 2000 as amended. **There are no European sites in the immediate vicinity of the proposed development site.** The closest European site to the proposed development is Malahide Estuary SPA (004025) at 4.6km followed by Baldoyle Bay SPA (004016) and Baldoyle Bay SAC (000199) at 6.8km. Section 1 of the AA screening report sets out a description the existing spirals while section 2 sets out the project description including demolition methodology (section 2.1.2). There are no features of ecological value directly within the site boundary. The proposed project site is bounded to the west and southwest by Terminal 1 and east and southeast by Terminal 2. Corballis Road South lies along the northern boundary of the site which is just south of T1 Short Term A car park. In relation to hydrology, the proposed project is within the Cuckoo catchment. All rainfall / surface water drainage for the proposed project drains to the Cuckoo Stream. All surface water features within the vicinity of the airport follow topography and flow in an easterly direction towards the coast. The Cuckoo stream is a tributary of the Mayne River which outfalls into Baldoyle Bay (Baldoyle Bay SAC/SPA) which is located approximately 6.6km to the east of the airport (8.1km downstream) The proposed development does not necessitate connection to water supply or wastewater. <u>Submissions and Observations</u> I refer the Board to section 3.0 of the main report.
2. Potential impact mechanisms from the project <u>Zone of Influence</u>

The AA screening report sets out that there are 17no. European sites within the potential ZoI of the project; 9no. SACs and 8no. SPAs. Fig. 6.1 of the AA screening report sets out Special Areas of Conservation within the potential ZoI of the proposed project. Figure 6.2 relates to Special Protection Areas within the potential ZoI of the proposed project and the QIs of the European sites in the vicinity of the proposed development are provided in Table 6.1.

In carrying out my assessment I have had regard to the nature and scale of the project, the distance from the site to Natura 2000 sites, and any potential pathways which may exist from the development site to a Natura 2000 site, aided in part by the EPA Appropriate Assessment Tool (www.epa.ie). Site synopsis and conservation objectives for each of these Natura 2000 sites are available on the NPWS website. In particular the attributes and targets of these sites are of assistance in screening for AA in respect of this project. I have also visited the site.

Annex 1 Habitats

There are no Annex I habitats present within the proposed development site or immediate environs.

Surface Water

Watercourses to which surface waters from the proposed project site discharge flow to Baldoyle Bay thereby providing a hydrological link between the project site and this SAC. Due to potential hydrological connectivity from the proposed project to Baldoyle Bay, the following European sites are subject to further assessment below; Baldoyle Bay SAC and Baldoyle Bay SPA.

Groundwater Body

The proposed project is located within the Dublin (Code IE_EA_G_008) groundwater body (GWB). This GWB is of 'Good' WFD status with an overall objective to 'Restore' and 'Protect' the current status. The proposed project is primarily underlain by a locally important aquifer that is moderately productive in local zones. The groundwater vulnerability beneath the route is predominately 'High'. This indicates that the bedrock would be shallow in this area and highly vulnerable to potential contamination (EPA maps, 2024). Given the nature and scale of the proposed project, it is not anticipated that excavation work will be required and therefore potential contamination to groundwater via excavation works is not likely.

Birds

The AA screening report states that the Irish Wetland Bird Survey has 1 no. waterbird count site located ca. 3.69km southeast of the project site. This site is the closest waterbird count sites to the project site. Other sites are located within the SPAs located along the east coast which are all located at >5km from the study area.

Wetlands

There are no wetland sites within the project site.

Species

The project site is made up of hardstanding surfaces (concrete) and as such does not proffer habitats suitable for protected species.

*The AA screening reports states that as part of the ongoing airport operations, a Dublin Airport Wildlife and Habitat Management Plan (daa, 2024) is in place which permits airport operators to disturb and prevent birds from nesting or flocking at or immediately adjacent to Dublin Airport in the interests of public safety, as such there is limited potential for nesting birds within the proposed development site.

Conclusion on the extent of the Zone of Influence

The zone of influence of the proposed project therefore includes those European sites with potential indirect connectivity through the following pathways:

▪ Hydrological – effects from surface water quality and quantity (1km).

Due to potential hydrological connectivity from the proposed project to Baldoyle Bay, the following European sites are subject to further assessment below; Baldoyle Bay SAC and Baldoyle Bay SPA.

I concur with the AA Screening Report that all other European Sites can be screened out, due to a lack of any source-pathway-receptor connection with the proposed development. The site of the proposed development supports no suitable ex-situ habitat for SCI bird species listed for any of the SPAs located within the precautionary ZOI of the Site. Furthermore, it is not deemed to be located in proximity to any important ex-situ feeding sites; being located within the landside operations of Dublin Airport.

In applying the 'source-pathway-receptor' model, in respect of potential indirect effects, I would accept that all sites outside of Dublin Bay including the North West Irish Sea SPA can be screened out for further assessment at the preliminary stage based on a combination of factors including the intervening minimum distances and the lack of direct hydrological pathway or biodiversity corridor link to these conservation sites and the dilution effect with surface water runoff. Furthermore, in relation to the potential connection

to sites in the outer Dublin Bay area, I am satisfied that the distance to the boundary of the North Dublin Bay SAC, Malahide Estuary SAC, Rogerstown Estuary SAC & SPA , Lambay Islands SAC & SPA, Rockabill to Dalkey Island SAC, the North Bull Island SPA, Howth Head Coast SPA, South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA AND Dalkey Islands SPA given the nature and scale of the proposed development, the insignificant loading in terms of surface water, the intervening distances and the significant marine buffer and dilution factor that exists between the sites. I conclude that it is reasonable to conclude on the basis of the available information that the potential for likely significant effects on these sites can be excluded at the preliminary stage.

Having regard to the foregoing, my screening assessment will focus on the impact of the proposal on the conservation objectives of the European Sites and their qualifying interests as summarised in the table 1 below. I am satisfied that no other European Sites fall within the possible zone of influence.

3. European Sites at risk

Having regard to the potential ZOI and the submitted AA document, the following Natura 2000 sites are identified as requiring further consideration for potential impacts due to possible indirect hydrological connections between the development and the European Sites in Dublin Bay via the surface water drainage network"

- Baldoyle Bay SAC
- Baldoyle Bay SPA

The Qualifying Interests are described under Table 1 below. A brief description is also provided.

Their current conservation status, attributes, measures and targets are expanded upon in Section 6 of the applicant's submitted document.

Table 1 European Sites at risk from impacts of the proposed project

Effect mechanism	Impact pathway/Zone of influence	European Site(s)	Qualifying interest features at risk

Habitat degradation as a result of hydrological impacts	indirect hydrological connection via the receiving surface water network, which drains to the Cuckoo Stream which is a tributary of the Mayne River which outfalls into Baldoyle Bay.	Baldoyle Bay SAC (001999)	Mudflats and sandflats not covered by seawater at low tide [1140] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410]
Habitat degradation as a result of hydrological impacts	indirect hydrological connection via the receiving surface water network, which drains to the Cuckoo Stream which is a tributary of the Mayne River which outfalls into Baldoyle Bay.	Baldoyle Bay SPA (004016)	Light-bellied Brent Goose (Branta bernicla hrota) [A046] Shelduck (Tadorna tadorna) [A048] Ringed Plover (Charadrius hiaticula) [A137] Golden Plover (Pluvialis apricaria) [A140] Grey Plover (Pluvialis squatarola) [A141] Bar-tailed Godwit (Limosa lapponica) [A157] Wetland and Waterbirds [A999]

Brief Description of Baldoyle Bay SAC - Baldoyle Bay SAC extends from just below Portmarnock village to the west pier at Howth in Co. Dublin. It is a tidal estuarine bay protected from the open sea by a large sand-dune system. Two small rivers, the Mayne and the Sluice, flow into the bay. Large areas of intertidal flats are exposed at low tide at this site. These are mostly sands but grade to muds in the inner sheltered parts of the estuary. During summer, the sandflats of the sheltered areas are covered by mats of green algae. Baldoyle Bay is an important bird site for wintering waterfowl and the inner part of the estuary is a Special Protection Area under the E.U. Birds Directive as well as being a Statutory Nature Reserve.

Brief Description of Baldoyle Bay SPA -Baldoyle Bay, located to the north and east of Baldoyle and to the south of Portmarnock, Co. Dublin, is a relatively small, narrow estuary separated from the open sea by a large sand dune system. Two small rivers, the Mayne River and the Sluice River, flow into the inner part of the estuary. Baldoyle Bay is an important site for wintering waterfowl, providing good quality feeding areas and roost sites for an excellent diversity of waterfowl species.
Full descriptions of the sites scan be found on www.npws.ie

- **Likely significant effects on the European site(s) 'alone'**

I refer the Board to Section 6.4 of the AA screening report submitted with the application which identifies the potential impacts on European Sites; Baldoyle Bay SAC and Baldoyle Bay SPA.

- Due to the hydrological connectivity of the airport lands with Baldoyle Bay SAC/SPA, there is the potential for indirect impacts if there is degradation of water quality in the Cuckoo stream, which outfalls to the Mayne River before discharging to Baldoyle Bay SAC/SPA.

I have reviewed section 6.4 and I concur with the conclusions presented. I am satisfied that no risks to the conservation objectives of the Baldoyle Bay SAC and Baldoyle Bay SPA or any Natura 2000 sites are considered likely due one or more of the following:

- Whilst hydrological connectivity from the project site exists to this habitat, the connectivity is weak and there is no potential for the proposed works to result in likely significant effects on the 8.1km downstream habitat via the Cuckoo stream given the levels of potential contaminants the proposed project could potentially generate and given the dilution, dispersal and attenuation that would occur within the 8.1km of intervening watercourse.
- All surface water drainage will continue to discharge to the existing drainage network at the existing discharge points. As there are no changes to the buildings surface water drainage rates or drainage outfalls, no significant impacts are anticipated from drainage flow rates on the Cuckoo stream as a result of the proposed project. As such, no significant impacts from drainage flow rates are anticipated on Baldoyle Bay SAC/SPA following completion of the proposed project.
- Baldoyle SPA is designated for a range of wintering waders and wildfowl that frequent coastal estuaries and is also designated for the wetlands that support these species. There is no direct overlap between the proposed project and the SPA. The proposed project is sufficiently remote that there is no risk of direct disturbance to waders and wildfowl using the SPA.

- Following completion of the proposed project, no impacts on European sites are considered likely as there will be no changes to surface water drainage which is the only viable pathway from the proposed project to the downstream SAC and SPA associated with Baldoyle Bay.

Based on a consideration of the likely impacts arising from the proposed works and a review of their significance in terms of the conservation interests and objectives of the Natura 2000 Sites screened, no significant impacts have been identified on the Natura 2000 sites as a result of the proposed development.

4. Where relevant, likely significant effects on the European site(s) 'in-combination with other plans and projects'

In combination or Cumulative Effects

The applicant's Appropriate Assessment Screening Report has considered cumulative / in-combination impacts in section 6.5 of the AA screening report.

A Planning Search was carried out and key developments within the vicinity of the site are set out in table 6.6. The AA screening report notes that the Proposed developments to be undertaken within Dublin Airport lands have been considered for their potential to act in-combination with the proposed T1 Spirals demolition project to cause significant cumulative effects that could impact on the receiving environment. Details of planned and /or ongoing projects, as provided by the daa in November 2024, indicate that there are currently 28no. other daa development projects at the pre-commencement, or construction stages or which are subject to imminent planning application.

Of these projects 8no. have been reviewed and immediately screened out for potential cumulative impacts (based on the location, nature, scale and/or timing of the projects). The remaining 20no. projects are detailed and evaluated in Table 6.-7. The report concludes that taking account of timing, location, nature and scale of the projects, and strict operational and regulatory procedures at the airport, it is considered that there will not be a significant cumulative impact on the proposed development from the additional infrastructure and maintenance projects anticipated for the airport. Furthermore, the proposed project will not result in significant environmental impacts during the demolition phase. As a result, no significant cumulative environmental impacts associated with this proposed project and live daa projects are likely to occur.

The development is considered unlikely to have any cumulative impact on any Natura 2000 sites in the context of the existing infrastructure and associated activities taking place at this site. The statement is supported by:

- The distance separating the site from Natura 2000 sites;
- Lack of direct hydrological pathway or biodiversity corridor link to the conservation sites;
- The dilution effect with other surface runoff;
- No additional surface water drainage discharge volumes or significant increases in flows to existing drainage network will occur as a result of the proposed project;
- The works do not involve the use of liquid or contaminating materials and as such there will be no likely pollution of the airport's surface water drainage network from potentially contaminating materials;
- The localised nature and limited scale of the proposed development.

The Fingal Development Plan 2023-2029 include a range of objectives intended to protect and enhance the natural environment, including those relating to European Sites, wastewater management, and surface water management. These objectives have themselves been subject to Appropriate Assessments, which have concluded that their implementation would not adversely affect the integrity of European sites.

It is reasonable to conclude that on the basis of the information on the file, which I considered adequate in order to issue a screening determination, that the proposed development individually or in combination with other plans or projects would not be likely to have a significant effect on Baldoyle Bay SAC (site code 000199) and the Baldoyle Bay SPA (site code 004016) or any European site, in view of the sites' conservation objectives.

Overall Conclusion- Screening Determination

I conclude that the proposed development would not have a likely significant effect on any European Site either alone or in combination with other plans or projects. It is therefore determined that Appropriate Assessment (stage 2) [under Section 177V of the Planning and Development Act 2000] is not required.

There is no terrestrial or direct hydrological or groundwater pathway between the development site and any Natura 2000 site.

I am further satisfied the potential for significant effects, as a result of surface waters generated during the demolition stages, on the qualifying interests any Natura 2000 sites

can be excluded having regard to the following:

- surface water management during proposed demolition will be required to take on board the recommendations outlined in the DAA 'Construction Contractors Health & Safety and Environmental Rules for working on daa Infrastructure Manual' and the 'Airport Direction: Environment and Pollution' document in relation to water management. The contractor will implement temporary surface water drainage management systems including surface water runoff controls, if required, in order to ensure that the demolition works have no adverse impacts on water quality in accordance with best practice to prevent the risk of pollution during all work stages. General pollution prevention measures are set out in the Outline CEMP accompanying this application.
- No additional surface water drainage discharge volumes or significant increases in flows to existing drainage network will occur as a result of the proposed project. All surface water drainage will continue to discharge to the existing drainage network at the existing discharge points. As there are no changes to the buildings surface water drainage rates or drainage outfalls, no significant impacts are anticipated from drainage flow rates on the Cuckoo stream as a result of the proposed project. As such, no significant impacts from drainage flow rates are anticipated on Baldoyle Bay SAC/SPA following completion of the proposed project.
- The works do not involve the use of liquid or contaminating materials and as such there will be no likely pollution of the airport's surface water drainage network from potentially contaminating materials. There are no excavations in excess of 300mm proposed as part of the works activities and as such there is no potential for silt or sediment from areas of excavation to enter the drainage network.

No habitat fragmentation to any Natura 2000 site is predicted and there is no potential for impacts on the qualifying interests of Natura 2000 sites due to noise and other disturbance impacts during demolition given the level of separation between the sites. While there is a potential risk of noise and disturbance during construction to ex-situ qualifying species, no significant effects are predicted as it is unlikely that the qualifying species will use habitats within the subject lands and in any case the proposed development is not likely to result in a significant increase in noise and disturbance over the existing levels.

No measures intended to avoid or reduce harmful effects on European sites were taken into account in reaching this conclusion.

Appendix B - EIA -Screening Determination

A. CASE DETAILS		
An Bord Pleanála Case Reference	**322149-25**	
Development Summary	Demolition of 2 spiral ramps/ Modifications to be made to façade.	
	Yes / No / N/A	**Comment (if relevant)**
1. Was a Screening Determination carried out by the PA?		EIA not required
2. Has Schedule 7A information been submitted?	**Yes**	
3. Has an AA screening report or NIS been submitted?	**Yes**	An Appropriate Assessment Screening Report was submitted with the application.
4. Is a IED/ IPC or Waste Licence (or review of licence) required from the EPA? If YES has the EPA commented on the need for an EIAR?		**N/A**
5. Have any other relevant assessments of the effects on the environment which have a significant bearing on the project been carried out pursuant to other relevant Directives – for example SEA		SEA and AA were undertaken in respect of the Fingal Development Plan 2023-2029

B. EXAMINATION	Yes/ No/ Uncertain	Briefly describe the nature and extent and Mitigation Measures (where relevant) (having regard to the probability, magnitude (including population size affected), complexity, duration, frequency, intensity, and reversibility of impact) **Mitigation measures** –Where relevant specify features or measures proposed by the applicant to avoid or prevent a significant effect.	Is this likely to result in significant effects on the environment? Yes/ No/ Uncertain
This screening examination should be read with, and in light of, the rest of the Inspector's Report attached herewith			
1. Characteristics of proposed development (including demolition, construction, operation, or decommissioning)			
1.1 Is the project significantly different in character or scale to the existing surrounding or environment?		The project is for the demolition of existing concrete spiral within the landside section of the airport and façade work. The develop is part of on-gong broader construction works in and around the landside section of the airport. The proposed development is not regarded as being of a scale significantly at odds with the surrounding pattern of development	**No**
1.2 Will construction, operation, decommissioning or demolition works cause physical changes to the locality (topography, land use, waterbodies)?		The proposed demolition works will not involve changes to the topography of the site.	**No**
1.3 Will construction or operation of the project use natural resources such as land, soil, water, materials/minerals or energy, especially		Façade modifications will be typical for an urban development of this nature and scale.	**No**

resources which are non-renewable or in short supply?			
1.4 Will the project involve the use, storage, transport, handling or production of substance which would be harmful to human health or the environment?		Demolition/ Construction activities will require the use of potentially harmful materials, such as fuels and other such substances. Use of such materials would be typical for construction sites. Any impacts would be local and temporary in nature and the implementation of the standard construction practice measures and the submission of Construction and Environmental Waste Management Plan (CEMP) which would satisfactorily mitigate potential impacts.	**No**
1.5 Will the project produce solid waste, release pollutants or any hazardous / toxic / noxious substances?		Demolition works will be managed with the implementation of the standard measures outlined in the Construction Environmental Management Plan, Construction & Demolition Waste Management Plan, the project would satisfactorily mitigate the potential impacts.	**No**
1.6 Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?		The implementation of a Construction Environmental Outline Construction Management Plan, Outline Resource and Waste Management Plan/Drawings will satisfactorily mitigate emissions from spillages during construction and operation.	**No**
1.7 Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?		The location of the proposed development is surrounded by car park blocks, airport buildings (including terminal 2 building), roadways and the airfield. All passengers/airport users in the vicinity are potentially sensitive receptors in terms of noise and vibration. There is potential for demolition activity to give rise to noise and vibration emissions. Such emissions will be	**No**

		localised and short term in nature, and their impacts would be suitably mitigated by the operation of standard measures.	
1.8 Will there be any risks to human health, for example due to water contamination or air pollution?		Demolition activity is likely to give rise to dust emissions. Such construction impacts would be temporary and localised in nature and the application of standard measures would satisfactorily address potential risks on human health. A suitable condition relating to Construction Environmental Management Plan will mitigate potential impacts	**No**
1.9 Will there be any risk of major accidents that could affect human health or the environment?		No significant risk is predicted having regard to the nature and scale of the development. Any risk arising from demolition and construction will be localised and temporary in nature. The site is not at risk of flooding	**No**
1.10 Will the project affect the social environment (population, employment)		No	**No**
1.11 Is the project part of a wider large scale change that could result in cumulative effects on the environment?		No	**No**
2. Location of proposed development			
2.1 Is the proposed development located on, in, adjoining or have the potential to impact on any of the following: - European site (SAC/ SPA/ pSAC/ pSPA) - NHA/ pNHA - Designated Nature Reserve - Designated refuge for flora or fauna		The site comprises hardstanding surfaces (concrete) and does not proffer habitats suitable for protected species. There are no wetlands, riparian areas, river mouth within the immediate vicinity of the proposed development. The AA Screening Report noted two sites within the potential zone of influence – Baldoyle Bay SAC and Baldoyle SPA. Protected habitats or habitats	**No**

- Place, site or feature of ecological interest, the preservation/conservation/ protection of which is an objective of a development plan/ LAP/ draft plan or variation of a plan		suitable for substantive habituating of the site by protected species were not found on site during ecological surveys. The proposed development would not result in significant impacts to any protected sites. The screening report concluded Appropriate Assessment not required.	
2.2 Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, for example: for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?		The proposed development would not result in significant impacts to protected, important or sensitive species	
2.3 Are there any other features of landscape, historic, archaeological, or cultural importance that could be affected?		The spirals are not Protected Structures. There are 2 no. Protected Structures and 3 no. National Inventory of Architectural Heritage Structures within a 350m radius of the site. The closest is Corballis House (NIAH No. 11349002), situated c. 40m east of the site. Dublin Airport Church/Chapel (RPS 864, NIAH 11349001) is located 220m north of the site. The Old Central Terminal Building (RPS 612, NIAH 11349006) is located 300m northwest of the site. Dublin Airport house (SMR No. DU014-011) is located 270m southeast of the site. The Architectural Heritage Impact Assessment concludes that the development will not result in detrimental impacts on built or cultural heritage.	
2.4 Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, for example: forestry, agriculture, water/coastal, fisheries, minerals?		No such features are in this urban location, with the site separated from agricultural areas by intervening urban lands and road infrastructure	

2.5 Are there any water resources including surface waters, for example: rivers, lakes/ponds, coastal or groundwaters which could be affected by the project, particularly in terms of their volume and flood risk?		The development would not increase risk of flooding to downstream areas. The Cuckoo Stream located is ca. 450m south of the site. There are no recorded past flood events recorded at this waterbody (OPW, 2024)	
2.6 Is the location susceptible to subsidence, landslides or erosion?		No	
2.7 Are there any key transport routes(e.g. National primary Roads) on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?		The site is served by a local road network. There are sustainable transport options to the site and the spirals are not in active use to access public parking. No significant contribution to traffic congestion is anticipated to arise from the proposed development.	
2.8 Are there existing sensitive land uses or community facilities (such as hospitals, schools etc) which could be affected by the project?		The site is in active use as part of the airport and the existing airport activities will not be directly impacted by the prosed development.	
3. Any other factors that should be considered which could lead to environmental impacts			
3.1 Cumulative Effects: Could this project together with existing and/or approved development result in cumulative effects during the construction/ operation phase?		Having regard to the location, nature and scale of other projects, and strict operational and regulatory procedures at the airport, it is considered that there will not be a significant cumulative impact on the proposed development from the additional infrastructure and maintenance projects anticipated for the airport. Furthermore, the proposed development will not result in significant environmental impacts during the demolition phase. As a result, no significant cumulative environmental impacts associated with this proposed development and live DAA projects are likely to occur. Based on the nature and scale of the proposed development and the fact that demolition mitigation	

		measures set out in the Construction Environmental Management Plan and Embodied Carbon Plan, no significant cumulative effects are anticipated.	
3.2 Transboundary Effects: Is the project likely to lead to transboundary effects?		**No**	
3.3 Are there any other relevant considerations?		**No**	
C. CONCLUSION			
No real likelihood of significant effects on the environment.	■	EIAR Not Required	
Real likelihood of significant effects on the environment.	☐	EIAR Required	

D. MAIN REASONS AND CONSIDERATIONS

EG - EIAR <u>not</u> Required

Having regard to: -

1. the criteria set out in Schedule 7, in particular
   (a) the limited nature and scale of the proposed development, within the existing landside section of Dublin Airport served by public infrastructure
   (b) the absence of any significant environmental sensitivity in the vicinity, and the location of the proposed development outside of the designated archaeological protection zone
   (c) the location of the development outside of any sensitive location specified in article 109(4)(a) of the Planning and Development Regulations 2001 (as amended)

2. the features and measures proposed by the applicant that are envisaged to avoid or prevent what might otherwise be significant effects on the environment, including measures identified to be provided as part of the project the Appropriate Assessment screening Report, Outline Construction Managed Plan, Embodied Carbon Plan and Architectural Heritage Impact Assessment. It is considered that the

proposed development would not be likely to have significant effects on the environment and that the preparation and submission of an environmental impact assessment report would not, therefore, be required. The Board concluded that the proposed development would not be likely to have significant effects on the environment, and that an environmental impact assessment report is not required.

Inspector _____ **Date** _____

Approved (DP/ADP) _____ **Date** _____

Appendix C – Water Framework Directive Screening Determination

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
Step 1: Nature of the Project, the Site and Locality			
An Bord Pleanála ref. no.	**322149-25**	**Townland, address**	Spiral Ramps, T1, Dublin Airport
Description of project		Demolition of 2 spiral ramps/ Modifications to be made to façade	
Brief site description, relevant to WFD Screening,		The subject lands infill in nature and form part of the wider built-up environment of Dublin Airport. The Cuckoo Stream (EPA Code: IE_EA_09M030500) is located ca. 450m south of the site, and runs from West to East, and is crossed by the existing internal access road, which will be utilised for access to the proposed project. The stream is then culverted under the existing internal parallel access road and under the M1.	
Proposed surface water details		Surface water drainage in the vicinity of the location of the proposed works, discharges downstream of the Airport, to the Cuckoo stream. The Cuckoo stream is a tributary of the Mayne River which outfalls into the Mayne estuary, which in turn forms part of and outfalls to Baldoyle Bay, approximately 6.8km to the east of the airport lands. The Outline CEMP include a series of surface water management measures to be implemented during demolition to include; • The contractor will ensure all site personnel are trained in the handling of materials, the sensitive nature of the receiving environment, the drainage system and the consequences of accidental spillages;	

	• Dangerous Substances will be securely stored in COSHH stores within the site compound; Fuels, lubricants and hydraulic fluids for equipment used on the demolition site, as well as any solvents, oils, and paints will be carefully handled to avoid spillage, properly secured against unauthorised access or vandalism, and provided with spill containment according to best codes of practice; • Waste oils and hydraulic fluids will be collected in leak-proof containers and removed from the proposed project site for disposal or re-cycling; • Strict supervision of contractors will be adhered to in order to ensure that all plant and equipment utilised on-site is in good working condition. Any equipment not meeting the required standard will not be permitted for use within the site. This will minimise the risk of groundwater becoming contaminated through site activity. General sediment control measures to prevent surface water pollution and excessive dust generation are summarised as follows: • Place sediment traps on all drainage lines such as geotextile lining; • Treat and discharge runoff water from retention basin at controlled flow rate through storm water discharge network; • Inspect and clean the collection channels and retention basin on regular basis to prevent sediment build up; • Stabilise the site as soon as possible after demolition; • Clear only the areas that are necessary for demolition works to occur; • Preserve grassed areas and vegetation where possible, as a minimum requirement a fuel and sediment filter sock is mandatory to filter fuel and sediment from storm water fun-off before it reaches the drainage system and to stop exposed soils being turned to mud by rainwater;

	• Delay removing vegetation and commencing earthworks until demolition works are commencing; and, • Avoid demolition works during times of expected heavy or lengthy rainfall.
Proposed water supply source & available capacity	N/A
Proposed wastewater treatment system & available capacity, other issues	N/A
Others?	On-site surface water flooding shall be mitigated by a site drainage system to comply with local authority drainage standards. The nearest European site to the proposed development is Baldoyle Bay SPA (Site Code: 004016) is located ca. 6.8 km from the site. The AA screening report determined that whilst hydrological connectivity from the project site exists to Baldoyle Bay SAC/SPA, the connectivity is weak and there is no potential for the proposed works to result in likely significant effects on the 8.1km downstream habitats or species via the Cuckoo stream given the levels of potential contaminants the proposed project could potentially generate and given the dilution, dispersal and attenuation that would occur within the 8.1km of intervening watercourse. No additional surface water drainage discharge volumes or significant increases in flows to existing drainage network will occur as a result of the proposed project The works do not involve the use of liquid or contaminating materials and as such there will be no likely pollution of the airport's surface water drainage network from potentially contaminating materials.

Step 2: Identification of relevant water bodies and Step 3: S-P-R connection						
Identified water body	**Distance to (m)**	**Water body name(s) (code)**	**WFD Status**	**Risk of not achieving WFD Objective e.g.at risk, review, not at risk**	**Identified pressures on that water body**	**Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)**
e.g. lake, river, transitional and coastal waters, groundwater body, artificial (e.g. canal) or heavily modified body.	Cuckoo Stream - located ca. 450m south of the site	MAYNE_010 (IE_EA_09M030500)	Poor	Review	Industry	Yes - The watercourse within is intended to provide a surface water discharge point for the proposed development.
	c.850m north of site	SLUICE_010 IE_EA_09S071100	Poor	Monitoring	No pressures	No – upstream
	Underlying site	Dublin - IE_EA_G_008	Good	Review	No pressures	Yes - Calcareous shale, limestone conglomerate. limestone . However, Given the nature and scale of the

							proposed project, it is not anticipated that excavation work will be required and therefore potential contamination to groundwater via excavation works is not likely.
Step 3: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.							
CONSTRUCTION PHASE							
No.	Component	Water body receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	**Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.**
1.	Site clearance / demolition	MAYNE_010 (IE_EA_09M 030500)	Surface water runoff	Siltation, pH (Concrete), hydrocarbon spillages	Standard construction practice CEMP	No	Screened out

OPERATIONAL PHASE							
3.	N/A – Development relates primarily to demolition works.						
4.	Note: I draw the Boards attention to the fact that the DAA undertake monthly surface water quality monitoring at key locations on the Cuckoo Stream. Samples are selected for field measurement / laboratory analysis of all or some of the following parameters: pH, Temperature, Dissolved Oxygen, Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD), Ammonia (as N) and Total Petroleum Hydrocarbons (TPH).						
DECOMMISSIONING PHASE							
5.	NA	NA	NA	NA	NA	NA	NA