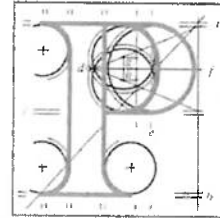


Our Case Number: ACP-324350-26



**An
Coimisiún
Pleanála**

daa
c/o Lungelo Nkosi
THREE The Green
Dublin Airport Central
Dublin Airport
Swords
Co. Dublin
K67 X4X5

Date: 13 July 2026

Re: Proposed development of 360 no. residential units

Mooretown, Swords, Co. Dublin

Dear Sir / Madam,

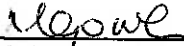
An Coimisiún Pleanála has received your recent submission in relation to the above-mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Commission has approved it or approved it with conditions.

If you have any queries in relation to the matter, please do not hesitate to contact the undersigned officer of the Commission at laps@pleanala.ie.

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,


Muirín Gowen
Executive Officer
Direct Line: 01-8049323

JA03

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Láithreán Gréasáin
Ríomhphost

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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Muirin Gowen

From: Appeals2
Sent: Monday 13 July 2026 14:45
To: LAPS
Subject: FW: Article 28 Submission
Attachments: 13.07.26 PARTX_001_26.pdf

From: Lungelo Nkosi (CW) <lungelo.nkosi.cw@daa.ie>
Sent: Monday 13 July 2026 13:14
To: SIDS <sids@pleanala.ie>; Appeals2 <appeals@pleanala.ie>
Cc: Planning-daa <planning@daa.ie>
Subject: Article 28 Submission

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

Dear Sir/Madam,

On behalf of daa, please see the attached observation in relation to the following case:

PARTX/001/26

Kind Regards,

Lungelo Nkosi (CW)



Lungelo Nkosi | Infrastructure
Planning Department
E: lungelo.nkosi.cw@daa.ie
T: +353 1 944 2351

THREE The Green, Dublin Airport Central,
Dublin Airport, Swords, Co. Dublin, K67 X4X5, Ireland

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daa proudly supporting Cancer Fund for Children , The Keeley D Foundation and The Kevin Bell Repatriation Trust - our 2026 Charities of the Year.

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daa plc. Registered office: Dublin Airport, Co. Dublin. Registered Number: 9401 Ireland.

SÉANADH: Tá an fhaisnéis sa ríomhphost seo agus i gceangaltáin ar bith faoi rún agus tá sé d'aird agus d'úsáid an Fhreagróra (na bhFreagróirí) dá bhfuil sé ceaptha amháin. Más rud é nach tusa an freagróir (na freagróirí) dá bhfuil an ríomhphost seo ceaptha, ní cheadaítear duit an teachtaireacht, an ceangaltá(i)n nó cuid ar bith dó a úsáid, a nochtadh, a chóipeáil, a scaipeadh nó a choinneáil. Má chreideann tú go bhfuair tú an ríomhphost seo trí earráid, bheimis buíoch dá gcuirfeá é sin in iúl dúinn láithreach. Scríos gach cóip den ríomhphost seo agus ceangaltá(i)n ar bith ó chóras do ríomhaire chomh maith le do thoil.

Mura bhfuil sé luaite go sainráite, níl sé beartaithe leis an ríomhphost seo caidreamh conarthach ar bith a chruthú. Murar seoladh an ríomhphost seo i gcúrsaí fhostaíocht an tseoltóra nó i gcomhlíonadh a dhualgas/a dualgas ní ghlacfaidh daa dliteanas ar bith as ábhar na teachtaireachta nó ceangaltá(i)n ar bith.

daa cpt. Oifig Chláraithe: Aerfort Bhaile Átha Cliath, Co. Bhaile Átha Cliath. Uimhir Chláraithe: 9401 Éire.

Document Classification: Class 1 - General

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The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

By email (sids@pleanala.ie)

13 July 2026

Re: Reg. Ref. Number: PARTX/001/26

Site Location: Mooretown, Swords, Co. Dublin.

Development Description: *The proposed development seeks the construction of 360 no. residential units, consisting of 305 no. houses, 20 no. own-door duplex units, and 35 no. apartments, ranging from 2-5 storeys in height.*

Dear Sir/Madam

daa, Head Office, Dublin Airport, Co. Dublin, in its capacity as a statutory consultee under Article 28(1)(i) of the Planning and Development Regulations 2001 (SI No. 600 of 2001), makes the following observation regarding the above proposed development.

Dublin Airport Noise Zone D

The proposed development is located within Dublin Airport Noise Zone D. The Fingal Development Plan 2023-2029 contains the following objective in respect of this area:

Objective DAO11

Strictly control inappropriate development and require noise insulation where appropriate in accordance with Table 8.1 above within Noise Zone B and Noise Zone C and where necessary in Assessment Zone D, and actively resist new provision for residential development and other noise sensitive uses within Noise Zone A, as shown on the Development Plan maps, while recognising the housing needs of established families farming in the zone. To accept that time based operational restrictions on usage of the runways are not unreasonable to minimise the adverse impact of noise on existing housing within the inner and outer noise zone.

Policy objective DAO-11, seeks to strictly control provision of new residential development and other noise sensitive uses within Zones A, B, C and where appropriate in Zone D. It is intended to effectively manage encroachment of noise sensitive development in the environs of Dublin Airport under the Balanced Approach, and to prevent more people being exposed to higher levels of aircraft noise. Such policies are an important management tool in ensuring compliance with the NAO for Dublin Airport.

Achievement of the Noise Abatement Objective

While daa has no objection in principle to residential development in Noise Zone D, the proposed development is located in an area in which any increase in population will be counted against achievement of the Noise Abatement Objective (NAO). If permitted and occupied, the number of people Highly Annoyed (HA) and Highly Sleep Disturbed (HSD) will increase having regard to the way in which the measurable criteria of the NAO are currently enumerated. In this respect, the NAO currently

An Bord Stiurthoirí / Board of Directors: Basil Geoghegan - Cathaoirleach/Chairman, Paula Cogan, Darren Kelly, Des Mullally, Kevin O'Connell, Ger Perdisatt, Mark James Ryan, Risteard Sheridan

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Uimhir Chláraithe: 9401 Éire Registered Office: Three, The Green, Dublin Airport Central, Dublin Airport, Swords, Co Dublin, K67 X4X5.
Registered Number: 9401 Ireland

assesses all populations located within the 45 dB Lden and 40 dB Lnight contours and upwards and does not take account of noise insulation measures:

The NAO will be primarily measured through the number of people highly sleep disturbed and highly annoyed in accordance with the approach recommended by the World Health Organisation's Environmental Noise Guidelines 2018 as endorsed by the European Commission through Directive 2020/367, taking into account noise exposure from 45 dB Lden and 40 dB Lnight. These measures describe those chronically disturbed by aircraft noise¹.

Future residents of the proposed development, which is located within the 65-69.9 dB Lden and 55-59.9 dB Lnight contours, will therefore be included in the calculation of HA and HSD numbers and consequently count against achievement of the NAO, which does not take account of noise mitigation measures.

To address these concerns, daa respectfully requests that the following considerations be applied when assessing this and future developments within airport noise zones:

1. **Alignment with Noise Management Objectives:** Noise sensitive developments such as the proposed development demonstrate that appropriate levels of indoor and outdoor residential amenity can be achieved, having appropriate regard to their location within the noise zones of Dublin Airport; the need to limit encroachment into high aircraft noise areas in line with EU Regulation 2014/598; and achievement of the NAO. This assessment should take account of the future noise environment as Dublin Airport grows.
2. **Comprehensive Noise Impact Assessments:** All applications for noise-sensitive development located in the noise zones of Dublin Airport should include detailed Noise Impact Assessments (NIA), which analyse indoor and outdoor noise exposure levels and recommending appropriate mitigation measures.

In this regard, daa acknowledges the findings in the Noise and Vibration Chapter (Chapter 13 of EIAR) which accompanied this application which finds that:

"The inward noise impact assessment shows that the main influencing source for future residents will be road traffic noise. Acoustic design measures such as appropriate glazing and ventilation specifications have been identified to ensure internal noise environments meet the required standards."

Notwithstanding the above, we are mindful that the development sits within the contours of the Noise Abatement Objective, therefore, the proposed development (if permitted) would be enumerated against the NAO. With this in mind, we recommend notifying ANCA if the Coimisiún is minded to grant permission, so that they can monitor any residential encroachment into the Noise Zones.

3. **Enhanced Disclosure:** In the interests of transparency, the Coimisiún should require by way of condition, that the Applicant and/or their agent, adequately advise prospective purchasers and/or occupiers that the development is located within a Noise Zone pertaining to Dublin Airport and thus is subject to higher aviation noise levels. This should include providing accurate and comprehensive information about the potential noise environment.
4. **Post-Planning Compliance:** The Coimisiún should require by way of condition, that the applicant and/or their agent, submit compliance reports verifying the implementation and effectiveness of noise mitigation measures prior to occupation of the development.

Consideration of the above items will support the Balanced Approach under European Union Regulation 2014/598, ensuring the protection of prospective residents' quality of life while maintaining Dublin Airport's operational capacity, promoting responsible and sustainable development in its vicinity.

Thank you for your consideration. Please feel free to contact me for further information.

Yours sincerely,

¹ Section 1.3, Page 5, Noise Abatement Objective Report for Dublin Airport (June 2022)



Lungelo Nkosi (CW)
Statutory Planner
(planning@daa.ie)