Our Case Number: ACP-324637-26

An Coimisiún Pleanála

Fingal County Council
c/o Abhilash Nair
Planning & Development Department
County Hall
Swords
Co. Dublin
K67 X8Y2

Date: 30 September 2026

Re: Minister for Transport EIAR scoping request in relation to the Dublin Airport passenger cap, Swords, County Dublin

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned case. The contents of your submission have been noted.

If you have any queries in relation to the matter, please 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,

MGowen

Muirin Gowen
Executive Officer
Direct Line: 01-8049323

CH08

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64 Sráid Maoilbhríde
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64 Marlborough Street
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Muirin Gowen

From:	Planning Appeals <planningappeals@fingal.ie>
Sent:	Tuesday 29 September 2026 16:32
To:	Appeals2
Cc:	LAPS; Communications; James Sweeney; Darija Balciunaite
Subject:	ACP-324637-26 - Fingal County Council Submission
Attachments:	ACP-324637-26 Passenger Capacity EIA Scoping.pdf

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Dear Sir/Madam,

Please find attached response to correspondence received in respect of the above application.

Yours faithfully,

Abhilash Nair I Clerical Officer
An Roinn Pleanála agus Forbatha | Planning & Development Department
Comhairle Contae Fhine Gall, Áras an Chontae, Sórd, Baile Átha Cliath, K67 X8Y2
Fingal County Council, County Hall, Main Street, Swords, Co. Dublin, K67 X8Y2

Comhairle Contae Fhine Gall
Fingal County Council

An Roinn Pleanála agus Forbartha
Planning and Development Department

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Tá an ríomhphost seo agus aon chomhad a ghabhann leis faoi rún agus d'fhéadfadh sé a bheith faoi phribhléid dhlíthliúil. Is ar an seolaí amháin atá sé dírithe. Mura tú an faighteoir beartaithe, tá cosc ar aon nochtadh, cóipeáil, dáileadh, nó aon ghníomh a dhéanamh nó a fhágáil ar lár i dtaca leis an ríomhphost agus d'fhéadfadh sin a bheith mídhleathach. Ní féidir cumarsáid idirlín a ráthú a bheith slán nó saor ó earráidí mar d'fhéadfadh faisnéis a bheith idircheaptha, truaillithe, caillte, scriosta, nó teacht déanach nó neamhiomlán. Dá bhrí sin, ní féidir linn glacadh le freagracht as aon earráidí nó easnaimh atá sa teachtaireacht seo, nó aon iatán, a tháinig chun cinn mar thoradh ar an tarchur ríomhphoist. Tá an teachtaireacht cuardaithe ag bogearraí Frithvíreas.

Comhairle Contae Fhine Gall
Fingal County Council

Planning and Development Department

29 September 2026

To: An Coimisiún Pleanála
64 Marlborough Street,
Dublin 1, D01 V902

Your Ref: ACP-324637-26

Re: Minister for Transport EIAR scoping request in relation to the Dublin Airport passenger cap, Swords, County Dublin

Dear Sir/Madam,

We refer to your correspondence dated 16 September 2026 in respect of the "EIAR scoping request in relation to the Dublin Airport passenger cap". We welcome the opportunity to engage at this stage of the process.

An Coimisiún Pleanála acts as a designated competent authority in Ireland for conducting Environmental Impact Assessments (EIA) on major planning applications, appeals, and strategic infrastructure development. The Planning Authority note that in this instance and as per Section 15(1) of the Dublin Airport (Passenger Capacity) Act 2026, the Commission shall carry out an environmental impact assessment of a proposal in respect of which an application has been made.

In this regard, the Planning Authority wish to make to following observations (overleaf) in accordance with section 12(3)(b) of the 2026 Act in relation to the information to be contained in the EIAR.

We trust that this information is of benefit to An Coimisiún Pleanála in its role as the designated competent authority for conducting EIA and in carrying out an environmental impact assessment of a proposal in respect of the Dublin Airport passenger cap.

Yours sincerely,

R Burke

Róisín Burke
Director of Service
Planning and Development Department

Comments on the Scoping of the EIAR

While the project information provided is acknowledged information on the detail of the information which forms basis for describing the receiving environment, the assumptions for detailing the future scenarios, and the methodologies for the individual and cumulative assessments is high level or not provided. As such, comments for the scoping of the EIAR are also high level in nature.

The Existing Planning Conditions Limiting Passenger Capacity at Dublin Airport

Passenger capacity at Dublin Airport is limited by 2 planning conditions:

> *Condition No.3 of the Terminal 2 (T2) Parent Permission (ABP Ref. PL06F.220670 (F06A/1248)) Granted 29/08/2007:*
>
> "*The combined capacity of Terminal 2 as permitted together with Terminal 1 shall not exceed 32 million passengers per annum unless otherwise authorised by a further grant of planning permission.*
>
> *Reason: Having regard to the policies and objectives of the Dublin Airport Local Area Plan and capacity constraints (transportation) at the eastern campus.*"
> and
>
> *Condition No.2 of the Terminal 1 (T1) Extension Permission (ABP Ref. PL06F.223469 (F06A/1843)) Granted 10/01/2008:*
>
> "*The combined capacity of Terminal 1 (including the extension authorised by this grant of permission) and Terminal 2 granted permission under planning register reference number F06A/1248 (An Bord Pleanàla appeal reference number PL O6F.220670) shall not exceed 32 million passengers per annum unless otherwise authorised by a further grant of planning permission.*
>
> *Reason: Having regard to the policies and objectives of the Dublin Airport Local Area Plan and capacity constraints (transportation) at the eastern campus.*"

Having regard to the above conditions, the T2 application (ABP Ref. No. PL06F.220670 (F06A/1248)) was subject to environmental impact assessment (EIA) and an environmental impact statement (EIS) was prepared. Above Condition No. 3 of the T2 decision, limiting the capacity of the airport to 32mppa, was specifically attached by An Bord Pleanàla (ABP) having regard to the policies and objectives of the Dublin Airport Local Area Plan and in recognition of capacity constraints and likely significant environmental effects of the development on the environment – including specifically in relation to transportation constraints at the eastern campus.

While an EIA was not required for the T1 application (ABP Ref. No. PL06F.223469 (F06A/1843)), the assessment of the application by ABP had regard to the T2 decision and the associated EIS and attached the above Condition No. 2 – again limiting the capacity of the airport to 32mppa in recognition of capacity constraints and likely significant environmental effects of the development on the environment – including specifically in relation to transportation constraints at the eastern campus.

Environmental Impact Assessment Report

Given the basis for the above conditions and level of increase in passenger capacity being sought, it is critical that a detailed and thorough analysis and assessment of all environmental aspects is carried out.

Of particular importance are the environmental topics of:

- Traffic and Transport;
- Air Quality;
- Climate;
- Noise and Vibration (non-aircraft and aircraft);
- Human Health,
- And potential Interaction and Cumulative Effects.

It is critical that a detailed and thorough analysis and assessment of the existing (2023 and 2025) and future traffic and transport environment (2029 and 2040) is carried out. This analysis, projection and assessment is also important to the assessment of the Air Quality, Climate, Human Health and cumulative aspects of the EIAR. Preliminary assessment findings (Figure 6) of 'moderate adverse' impacts at the Airport Roundabout and at the Ground Transportation Centre (GTC) are noted. Any adverse impact on the GTC could be significant for the airport and surrounding transport network. The assessment should be carried out with direct consultation with TII, the NTA and the HSA, with regards to establishing the correct baseline, future development (and traffic) pressure surrounding the airport, transport modal shift, and in agreeing the appropriate modelling framework for future scenarios, including projecting when Metrolink would come on-line – which is currently post the 2029 assessment scenario. Given this position a potential 'worse-case' scenario for traffic and transportation could be mid 2030s or later, prior to opening of Metrolink.

In relation to Climate – and associated Human Health, we would note the requirement to consider and assess the proposed Order against national and international climate targets, and to consider climate impacts that could lead to significant emissions or potentially have an adverse impact on human health.

Likewise in terms of Air Quality, operational phase emissions of NOX, PM10 and PM2.5 from increased road vehicle trips, increases in air traffic movements, emissions from ground vehicles and ground operations and odour, due to the handling of aviation fuel, should all be fully assessed.

In terms of the Supplementary Assessments, Population – but specifically Human Health – should be included in the assessment framework (it is currently excluded in Figure 4 of the project information provided). This is particularly important in terms of cumulative effects including in terms of evening and night-time noise impacts.

In relation to planning application FCC Reg. Ref. No.: F23A/0781 (pending with Fingal County Council (FCC), and which includes a proposed increase from 32mppa to 40mppa, the Airport Noise Competent Authority (ANCA) has determined that a noise problem would arise and has

prepared and published a Draft (Amended) Noise Abatement Objective (DNAO) and a Draft Regulatory Decision (DRD) proposing noise mitigation measures. It is not clear if the EIAR is based on the existing NAO and RD, or if or how the EIAR will take account of the amended NAO and DRD.

Any assumptions, scenario modelling, approximations, uncertainties or difficulties proposed or encountered in the preparation of the EIAR, or of any individual chapters, must be clearly highlighted, defined and fully described. Likewise, control measures and mitigation measures must be applicable, implementable and capable of being monitored for effectiveness, with corrective protocols provided where appropriate.