3 Alternatives

3.1 Introduction

3.1.1 This chapter provides a description of the reasonable alternatives studied by daa that are relevant to the Proposed Order and its specific characteristics, together with an indication of the main reasons for selecting the preferred option, including a comparison of the environmental effects. The chapter has been prepared in accordance with the requirements of the Dublin Airport (Passenger Capacity) Act 2026 and in a manner consistent with the principles of the EIA Directive relating to the consideration of reasonable alternatives.

3.1.2 The EIA Directive provides that an EIAR should describe the reasonable alternatives studied by the developer which are relevant to the project and its specific characteristics. In explaining the meaning of 'reasonable' in this context, the European Commission's guidance on the preparation of an EIA Report states that "Alternatives have to be 'reasonable', meaning that feasible Project options meet the Project's objectives." The European Commission's guidance further explains that alternatives should be capable of contributing to the achievement of the objectives of the project and be feasible having regard to technical, economic, political and other relevant criteria.

3.1.3 Consistent with this approach, the EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (2022) state that the objective is for the developer to present a "representative range of the practicable alternatives considered". Accordingly, the requirement to consider reasonable alternatives does not extend to every theoretically possible option, but to genuine and practicable alternatives which are relevant to the project and its specific characteristics and capable of contributing to the achievement of the project's objectives. Reasonable alternatives are not required to achieve all of those objectives, or to achieve them to the same extent as the preferred option.

3.1.4 The nature and range of reasonable alternatives relevant to the Proposed Order reflect its particular characteristics and objectives. As the Proposed Order does not comprise physical development, alternatives concerning matters such as site selection, layout, design or construction technology would not address the existing passenger capacity conditions or contribute to the achievement of daa's objectives and therefore do not constitute reasonable alternatives in this context.

3.1.5 Instead, daa's consideration of reasonable alternatives relevant to the Proposed Order addresses two matters: first, the mechanisms genuinely and practicably available to address the existing passenger capacity conditions; and second, having identified the mechanism to be pursued, the form and scope of the Proposed Order for which an application could be made.

3.2 Planning and Strategic Context

3.2.1 Dublin Airport is the State's primary international airport and a critical element of national transport infrastructure. It performs an important strategic role in supporting international connectivity, trade, tourism, foreign direct investment, labour mobility, regional access, business travel, cargo movement and social connectivity. The continued development and effective operation of Dublin Airport is recognised within national, regional and local planning and transport policy.

3.2.2 The existing passenger capacity conditions applying at Dublin Airport arise from the planning permissions granted by An Bord Pleanála in 2007 for Terminal 2 and associated development and in 2008 for the Terminal 1 extension. At that time, Dublin Airport was handling approximately 18 million passengers per annum (mppa). The Environmental Impact Statement accompanying the Terminal 2 application assessed a forecast of 30 mppa by 2015/2016 and an ultimate operating capacity of approximately 35 mppa, based on the airport infrastructure and operational conditions assumed at the time of that assessment.

3.2.3 The 32 mppa limit therefore represented a substantial increase above passenger throughput at the time it was imposed and provided for significant future growth. It did not represent the assessed physical or

operational capacity of the airport infrastructure, nor did it constitute an immediate practical constraint on airport operations. Rather, the conditions established a forward-looking passenger throughput limit which was expected to be reached at a future point as demand increased.

3.2.4 Passenger demand at Dublin Airport has subsequently grown substantially. Passenger throughput reached approximately 33.5 mppa in 2023, 34.6 mppa in 2024 and 36.4 mppa in 2025. The 32 mppa passenger capacity conditions have therefore moved from being a prospective constraint to an existing constraint on the operation and growth of Dublin Airport.

3.2.5 Proposals for an increase in passenger number to 40 mppa and additional airport infrastructure have separately been progressed through the Infrastructure Application (IA) on which a decision has not yet been made. The capacity assessment underpinning the IA was based principally on operational data available up to 2019 and identified that the airport could support approximately 36.4 mppa without additional infrastructure. Since that time, the operation of Dublin Airport and the characteristics of passenger demand have evolved. Changes in operations have included improvements in equipment, technology and operational processes within the existing airport footprint, together with changes in the air traffic movement demand profile, including increased average aircraft size and passenger load factors. These changes have increased the number of passengers that can be accommodated using the existing airport facilities and infrastructure.

3.2.6 In light of these changes, the capacity of the existing airport system was reassessed in 2026 using the most recent available operational data, including data through the end of 2025. The Airport Capacity Report (2026) concludes that the estimated capacity of the existing facilities, infrastructure, operational processes and current demand profile of Dublin Airport in 2026 is approximately 40.5 mppa[1]. This estimate does not include infrastructure currently under construction, planned future equipment deployment or operational improvements, or the infrastructure improvements proposed through the IA. On that basis, the existing airport facilities and operational processes are capable of accommodating the 40 mppa operational scenario assessed in this EIAR without reliance on the infrastructure improvements proposed through the IA.

3.2.7 There is consequently an urgent need for resolution of the existing passenger capacity conditions. Passenger throughput has already exceeded the 32 mppa limit and demand is forecast to continue to grow. In the absence of amendment or revocation of the existing conditions, the restriction would therefore continue to constrain the operation of Dublin Airport notwithstanding the demonstrated capacity of the existing airport system to accommodate passenger throughput of 40 mppa. The issue is an immediate and progressively increasing constraint, rather than one arising only in response to longer-term future growth. Timely resolution of the existing passenger capacity conditions is therefore necessary to enable passenger throughput to increase to 40 mppa in response to forecast demand.

3.2.8 In parallel, the Dublin Airport (Passenger Capacity) Act 2026 (the 2026 Act) provides a statutory mechanism through which the Minister for Transport may make an order amending or revoking a planning condition relating to the number of passengers that may use Dublin Airport. An order made under the 2026 Act does not itself provide consent for additional airport infrastructure.

3.2.9 Against this context, the reasonable alternatives considered in this chapter comprise, first, the mechanisms available to address the existing passenger capacity conditions and, second, the form and scope of the Order for which an application should be made, including whether the existing conditions should be amended or revoked and, if amended, the appropriate passenger throughput limit. As the Proposed Order does not authorise physical development, alternatives involving different infrastructure layouts or design solutions do not represent alternatives to the Proposed Order and are not considered further in this chapter.

3.3 Objectives for Addressing the Passenger Cap

3.3.1 The objectives of daa in seeking the Proposed Order have been established having regard to the strategic, planning, operational and statutory context described in Section 3.2. These objectives informed the identification and screening of reasonable alternatives and the selection of the preferred

[1] Airport capacity is dynamic and may change over time in response to factors including demand characteristics, flight schedules, technology and changes in airport and airline operational practices.

option: an application under the 2026 Act for an Order amending the existing passenger capacity conditions to 40 mppa.

3.3.2 The statutory context for these objectives is established by the Dublin Airport (Passenger Capacity) Act 2026, which provides for the amendment or revocation of planning conditions relating to the number of passengers that may use Dublin Airport and for connected matters. The 2026 Act provides the mechanism through which the Minister may make an Order amending or revoking such a condition. In determining the form of Order for which to apply, daa has also had regard to the statutory purpose and matters identified in the 2026 Act, including the strategic importance of Dublin Airport to international connectivity, trade, tourism, investment and the movement of persons and cargo to, from and within the State.

3.3.3 Against this statutory, strategic, planning and operational context, daa's objectives in seeking the Proposed Order are to:

- enable passenger throughput at Dublin Airport to increase beyond the existing 32 mppa planning restriction, having regard to forecast passenger demand;
- make efficient and effective use of the existing operational capacity and infrastructure of Dublin Airport, without reliance on the authorisation or delivery of additional airport infrastructure;
- support the continued provision and development of national and international connectivity through Dublin Airport, consistent with its strategic role and relevant Government aviation and planning policy; and
- identify and pursue, as a matter of urgency, an available statutory process capable of securing a decision on the amendment or revocation of the existing passenger capacity conditions with the least practicable delay.

3.3.4 The options identified were assessed against these objectives to determine whether they constituted reasonable alternatives to the Proposed Order and warranted further consideration. Options which would not materially achieve these objectives, or which did not represent practicable alternatives available to daa, were not taken forward for detailed assessment.

3.4 Approach to the Alternatives Assessment

3.4.1 The identification and evaluation of alternatives is informed by daa's strategic objectives set out in Section 3.3, relevant national, regional and local planning and aviation policy, the planning history of Dublin Airport, technical studies undertaken to establish the operational capacity of the existing airport, and engagement between daa and its technical and planning advisers. This process identified the range of options available to address the existing passenger capacity conditions and informed the identification of those considered to represent reasonable alternatives.

3.4.2 In identifying reasonable alternatives, daa considered whether each option represented a genuine and practicable choice for addressing the existing passenger capacity conditions and was capable of contributing to the objectives set out in Section 3.3. An option was not required to achieve all of the objectives, or to achieve them to the same extent as the preferred option, in order to be considered reasonable. However, options which were theoretical, not practicably available to daa, or did not represent a genuine means of addressing the existing passenger capacity conditions were not considered reasonable alternatives.

3.4.3 The reasonable alternatives identified on this basis were then evaluated having regard to the extent to which they would achieve daa's objectives and their likely environmental effects, to a level of detail proportionate to the nature of the alternative. This enabled the relative advantages and disadvantages of the alternatives to be compared and informed the selection of the preferred option, as described in Sections 3.5 and 3.6.

3.4.4 The alternatives assessment involved identifying the range of options available to address the existing passenger capacity conditions, screening those options to identify reasonable alternatives, and then assessing those reasonable alternatives. This process was undertaken in two stages. First, the alternative mechanisms available to address the existing passenger capacity conditions are considered

in Section 3.5. Second, having identified an application under the 2026 Act as the statutory mechanism being pursued for the Proposed Order, the reasonable alternatives concerning the form and scope of the Proposed Order are considered in Section 3.6.

3.5 Identification and Screening of Alternative Mechanisms

General

3.5.1 In identifying reasonable alternatives, daa first considered the mechanisms available to address the existing 32 mppa passenger capacity conditions. This consideration was undertaken having regard to daa's objectives set out in Section 3.3, including the need to address those conditions with the least practicable delay.

3.5.2 The possible mechanisms identified were:

- operation subject to the existing 32 mppa passenger capacity conditions, including through measures intended to secure compliance with those conditions;
- awaiting the determination of the Infrastructure Application (IA);
- making a separate planning application seeking amendment or removal of the existing passenger throughput restriction; and
- making an application for an Order under the Dublin Airport (Passenger Capacity) Act 2026 (the 2026 Act).

Retention of the Existing Passenger Capacity Conditions

3.5.3 Although identified as an available course of action, operation subject to the existing 32 mppa passenger capacity conditions, including through measures intended to secure compliance with those conditions, would not achieve daa's objectives. In particular, it would not address the existing constraint on passenger throughput, respond to forecast passenger demand or enable effective use of the demonstrated operational capacity of the existing airport. It was therefore screened out and was not considered to represent a reasonable alternative requiring further assessment.

Awaiting Determination of the Infrastructure Application

3.5.4 daa considered whether to await determination of the Infrastructure Application (IA) before pursuing an alternative statutory mechanism to address the existing passenger capacity conditions. The IA, lodged in December 2023, seeks permission for a package of airport infrastructure projects and also to amend the existing 32 mppa passenger capacity conditions to 40 mppa. The IA remains under consideration by Fingal County Council and is subject to a separate statutory planning and aircraft-noise assessment process. Its timing and outcome remain uncertain, including whether the proposed amendment of the passenger capacity conditions to 40 mppa would be granted.

3.5.5 Awaiting determination of the IA would not address the immediate timing imperative associated with the existing passenger capacity conditions. Passenger demand already exceeds 32 mppa, while decisions on airport capacity, airline scheduling and slot coordination are taken well in advance of each operating season. The timing and outcome of the IA remain uncertain and the decision could also be subject to appeal. Accordingly, awaiting determination of the IA would not provide a sufficiently timely means of addressing the existing passenger capacity conditions and would not achieve daa's objective of doing so with the least practicable delay. It was therefore screened out and was not considered to represent a reasonable alternative requiring further assessment.

Separate Planning Application

3.5.6 daa also considered making a standalone application through the planning system seeking amendment or removal of the existing passenger capacity conditions, without seeking approval for the package of physical airport infrastructure included in the IA. Such an application would provide a separate route through which the existing passenger capacity conditions could potentially be addressed. However, determination would be subject to the applicable planning process timelines and, where relevant, aircraft-noise assessment processes and associated appeal mechanisms.

3.5.7 Having regard to daa's objective of addressing the existing passenger capacity conditions with the least practicable delay, the Ministerial Order process provided a more direct and timely mechanism for achieving that objective. The standalone planning application was therefore screened out and was not considered to represent a reasonable alternative requiring further assessment.

Application for an Order under the 2026 Act

3.5.8 Following enactment of the 2026 Act, a specific statutory mechanism became available through which daa could apply to the Minister for Transport for an Order amending or revoking a planning condition relating to passenger capacity at Dublin Airport.

3.5.9 Having considered the available mechanisms, an application for a Ministerial Order under the 2026 Act was identified as the only option capable of meeting daa's objectives in full. In particular, the passenger capacity conditions require resolution on a shorter operational timetable than can be provided through the IA or a separate planning application. An Order provides the specific statutory mechanism established by the 2026 Act for addressing the passenger capacity conditions and is capable of providing the urgency and certainty required, without reliance on the determination or delivery of additional airport infrastructure.

3.6 Alternatives Considered

3.6.1 Having identified an application for a Ministerial Order under the 2026 Act as the only reasonable mechanism for addressing the existing passenger capacity conditions, daa then considered the form and scope of the Order for which an application should be made. The 2026 Act enables the Minister to amend or revoke a planning condition relating to passenger throughput but does not provide a statutory process for consenting additional physical airport infrastructure or other operational or regulatory interventions. The reasonable alternatives considered therefore comprised:

- amendment of the existing passenger capacity conditions to a limit below 40 mppa;
- amendment of the existing passenger capacity conditions to a limit of 40 mppa; and
- revocation of the existing passenger capacity conditions, or amendment of the existing passenger capacity conditions to a limit above 40 mppa.

3.6.2 Environmental considerations formed part of daa's evaluation of the reasonable alternatives. Different passenger throughput limits would result in different levels of airport, aviation and surface-access activity and could therefore alter the scale of effects through the same principal environmental pathways assessed elsewhere in this EIAR. Table 3-1 provides a qualitative comparison of the key environmental considerations associated with passenger throughput below 40 mppa, at 40 mppa and above 40 mppa, including the principal effect pathways and receptors where relevant.

3.6.3 The alternatives were considered on a consistent basis against a common future year and receiving environment. The comparison is intended to identify the relative environmental implications and key issues associated with the alternatives considered by daa. It does not seek to determine the magnitude or significance of effects for hypothetical passenger throughput levels for which no detailed operational scenario has been developed; detailed assessment of likely significant effects is undertaken for the preferred 40 mppa alternative in the technical chapters of this EIAR.

Table 3-1: Qualitative Comparison of Environmental Effects of Passenger Throughput Alternatives

Environmental topic	<40 mppa	40 mppa	Revocation (potential growth >40 mppa)
Traffic and Transport	Lower passenger and employee surface-access demand than at 40 mppa, resulting in lower traffic flows and correspondingly lower pressure on the surrounding road and public transport networks.	Greater passenger and employee surface-access demand than under a lower-throughput alternative, with increased traffic flows and greater pressure on the surrounding road and public transport networks.	Potential for further increases in passenger and employee surface-access demand, with correspondingly greater pressure on road and public transport networks than at 40 mppa.
Air Quality	Lower levels of airport-related road traffic, aircraft activity and on-airport operations than at 40 mppa, resulting in lower potential emissions of relevant air pollutants and lower potential effects on nearby sensitive receptors.	Greater airport-related traffic and operational activity than under a lower-throughput alternative, with correspondingly greater potential emissions and effects on nearby sensitive receptors.	Potential for further increases in airport-related traffic and operational activity, with correspondingly greater potential air-quality effects than at 40 mppa.
Non-Aircraft Noise and Vibration	Lower levels of landside and airport operational activity than at 40 mppa, with correspondingly lower potential for noise effects at nearby noise-sensitive receptors. Differentiation would be limited for noise sources not materially related to passenger throughput.	Greater landside and airport operational activity than under a lower-throughput alternative, with greater potential for operational noise effects at nearby noise-sensitive receptors.	Potential for greater landside and airport operational activity and associated noise effects than at 40 mppa.
Aircraft Noise and Vibration	Lower aviation activity than at 40 mppa, with lower potential aircraft-noise exposure at noise-sensitive receptors and lower pressure on the aircraft-noise environment.	Greater aviation activity than under a lower-throughput alternative, with greater potential aircraft-noise exposure at noise-sensitive receptors.	Potential for aviation activity and aircraft-noise exposure to increase beyond that associated with 40 mppa, depending on the scale and characteristics of future growth.
Land and Soils	No physical development is inherent in the alternative and therefore no direct land-take or soil-disturbance effects arise solely from the passenger throughput limit.	No physical development is inherent in the alternative and therefore no direct land-take or soil-disturbance effects arise solely from the 40 mppa limit.	Revocation would not itself authorise physical development. However, growth beyond the capacity of existing infrastructure could increase the likelihood of separately consented infrastructure being required, with potential land and soils effects arising from that development.
Water	Lower operational activity than at 40 mppa, with lower demand on drainage and water-management systems and lower potential for operational pressures on surface water, groundwater and wastewater systems.	Greater operational activity than under a lower-throughput alternative, with correspondingly greater demand on drainage, water-supply and wastewater systems and greater potential operational pressures on the water environment.	Potential for greater operational pressures on water-supply, drainage and wastewater systems than at 40 mppa. Any additional infrastructure required to support further growth could introduce further water-environment effects.
Biodiversity	Lower airport, traffic and aviation activity than at 40 mppa, with lower potential for indirect effects on	Greater airport, traffic and aviation activity than under a lower-throughput alternative, with greater potential	Potential for greater indirect effects on ecological receptors than at 40 mppa. Additional infrastructure, if

	ecological receptors through noise, air-quality, water and disturbance pathways.	for indirect effects on ecological receptors through noise, air-quality, water and disturbance pathways.	subsequently required and consented, could introduce further habitat-loss, disturbance or other ecological pathways.
Climate	Lower aviation, airport-operational and surface-access activity than at 40 mppa, resulting in lower greenhouse-gas emissions.	Greater aviation, airport-operational and surface-access activity than under a lower-throughput alternative, resulting in greater greenhouse-gas emissions.	Potential for further growth in aviation, airport-operational and surface-access activity and correspondingly greater greenhouse-gas emissions than at 40 mppa.
Cultural Heritage	No physical development is inherent in the alternative. Lower operational activity than at 40 mppa would also result in lower potential for indirect effects on the setting or amenity of heritage assets.	No physical development is inherent in the alternative. Greater operational activity than under a lower-throughput alternative could result in greater potential for indirect effects on the setting or amenity of heritage assets.	Revocation would not itself authorise physical development, but any separately consented infrastructure required to support further growth could introduce physical or setting effects on heritage assets.
Landscape and Visual	No physical landscape or visual change is inherent in the alternative. Lower operational activity could result in marginally lower levels of activity visible from surrounding receptors.	No physical landscape or visual change is inherent in the alternative, although increased operational activity would be greater than under a lower-throughput alternative.	Revocation would not itself result in physical landscape or visual change. Any additional infrastructure required to support further growth could introduce landscape and visual effects subject to separate consent.
Material Assets – Waste	Lower passenger and operational activity than at 40 mppa, resulting in lower waste generation and lower demand on waste-management systems.	Greater passenger and operational activity than under a lower-throughput alternative, resulting in greater waste generation and demand on waste-management systems.	Potential for greater waste generation and demand on waste-management systems than at 40 mppa.
Material Assets – Built Services	Lower passenger and operational activity than at 40 mppa, with lower demand for electricity, water, drainage, wastewater and other utility services.	Greater passenger and operational activity than under a lower-throughput alternative, with greater demand for utility and built-service capacity.	Potential for greater utility demand than at 40 mppa and, depending on the scale of future growth, increased pressure on existing built-service capacity.
Major Accidents and Disasters	Limited differentiation from the 40 mppa alternative arising solely from passenger throughput. Any change in risk would depend primarily on the nature and scale of associated aviation and airport operations rather than passenger numbers alone.	Limited differentiation from a lower-throughput alternative arising solely from passenger throughput. Risks would continue to be governed primarily by the nature and scale of aviation and airport operations.	Potential for changes in risk where growth beyond 40 mppa results in materially different operational activity or requires additional infrastructure, although such effects would depend on the specific nature of that growth.
Population and Human Health	Lower airport, aviation and surface-access activity than at 40 mppa, resulting in lower potential adverse effects associated with noise, air quality and traffic. However, socio-economic and connectivity benefits would also be lower.	Greater airport, aviation and surface-access activity than under a lower-throughput alternative, with greater potential adverse effects through noise, air-quality and traffic pathways, but also greater socio-economic and connectivity benefits.	Potential for greater adverse effects through noise, air-quality and traffic pathways than at 40 mppa, alongside potentially greater socio-economic and connectivity benefits, depending on the scale and nature of future growth.

Amendment to a Passenger Throughput Limit Below 40 mppa

3.6.4 Amendment of the existing passenger capacity conditions to a limit below 40 mppa was considered by daa to represent a reasonable alternative form of Order. A range of numerical limits between the existing restriction and 40 mppa would theoretically be possible; however, these do not represent materially distinct alternatives requiring separate assessment in each case. Rather, the implications vary progressively with the level of passenger throughput permitted. Passenger throughput had already reached 36.4 mppa in 2025. A limit below current passenger throughput would therefore require a reduction in activity, while a limit above current throughput but below 40 mppa would permit some further growth but would constrain that growth relative to the 40 mppa alternative.

3.6.5 As identified in Table 3-1, a lower passenger throughput limit would generally result in a lower level of airport, aviation and surface-access activity than the 40 mppa alternative and would therefore generally give rise to lower potential environmental effects. In environmental terms, this alternative would therefore be preferable to the 40 mppa alternative, with the degree of environmental benefit generally increasing as the permitted passenger throughput was reduced. The precise nature and scale of those benefits would, however, depend on the specific passenger limit and associated operational characteristics and cannot be assumed to vary directly or uniformly with passenger numbers.

3.6.6 These environmental advantages were considered alongside the extent to which a lower passenger throughput limit would achieve daa's objectives. Passenger throughput had already reached 36.4 mppa in 2025 and forecast demand is expected to continue to increase. A materially lower limit would therefore provide a less effective and less durable response to forecast demand, would constrain the extent to which the existing airport could accommodate that demand and could necessitate a further amendment or removal of the passenger capacity conditions within a relatively short period. Having weighed the generally lower potential environmental effects of this alternative against those considerations, daa did not select a passenger throughput limit below 40 mppa.

Amendment to 40 mppa

3.6.7 Amendment of the existing passenger capacity conditions to 40 mppa was considered by daa. This alternative would enable passenger throughput to increase to a level that can be accommodated by the existing airport facilities, infrastructure and operational processes. The Dublin Airport Annual Capacity Report (Ricondo, 2026) identifies the estimated capacity of the existing facilities, infrastructure, operational processes and current passenger demand profile at Dublin Airport as approximately 40.5 mppa. This estimate does not rely on the infrastructure improvements proposed through the IA, or on planned future equipment deployment or operational improvements.

3.6.8 A 40 mppa limit would amend, rather than revoke, the existing passenger capacity conditions and would retain a defined upper limit on passenger throughput.

3.6.9 As identified in Table 3-1, the 40 mppa alternative would have the potential for greater environmental effects than an alternative below 40 mppa as a consequence of the greater level of airport activity facilitated. These environmental considerations were balanced against the ability of the alternative to accommodate forecast passenger demand and make effective use of the extent to which the existing airport facilities and operational processes can accommodate passenger demand.

Revocation of the Existing Passenger Capacity Conditions (or amendment to more than 40 mppa)

3.6.10 Sections 7(2) and 25 of the 2026 Act provide for the revocation of the existing passenger capacity conditions. Revocation of those conditions in their entirety therefore represents a genuine and practicable option available to daa under the statutory mechanism established by the 2026 Act and was considered as a reasonable alternative. No specific passenger throughput limit above 40 mppa was identified for separate assessment, as no discrete operational scenario had been developed for such a limit; the potential implications of passenger throughput above 40 mppa were, therefore, considered to be comparable (i.e. the same or of lesser significance) with revocation as the higher-throughput alternative.

3.6.11 Revocation (or amendment to >40mppa) would remove the existing 32 mppa passenger capacity conditions without replacing it with a new numerical limit. It would therefore provide the greatest flexibility

to respond to future passenger demand and would not itself establish an upper limit on future passenger throughput at Dublin Airport.

3.6.12 Revocation (or amendment to >40mppa) would not, however, authorise any physical development at Dublin Airport. The available technical evidence identifies an estimated capacity of approximately 40.5 mppa within the existing airport facilities and infrastructure, based on existing operational processes and the current passenger demand profile. The level of passenger throughput that could be accommodated in the future would depend on the evolution of the passenger demand profile, operational characteristics and the performance of the existing airport system. Any new or upgraded airport or surface-access infrastructure that may subsequently be required would remain subject to separate statutory consent processes and, where applicable, environmental assessment.

3.6.13 As identified in Table 3-1, revocation (or amendment to >40mppa) would provide less certainty regarding the scale and nature of future airport activity, and consequently its environmental effects, than amendment to a defined passenger throughput limit. While the potential direction of environmental change associated with greater passenger throughput can be identified, the scale and significance of effects associated with growth materially beyond the demonstrated capacity of the existing airport would depend on the future demand profile, operational characteristics and any additional infrastructure required to accommodate that growth.

3.6.14 Having regard to the level of passenger throughput that can be accommodated by the existing airport facilities and operational processes, the forecast growth in passenger demand, daa's objectives and the relative environmental implications of the alternatives, revocation (or amendment to >40mppa) was considered less favourable than amendment to a defined limit of 40 mppa. A 40 mppa limit would accommodate forecast passenger demand within the capability of the existing airport facilities, infrastructure and operational processes, while providing greater certainty as to the scale of future airport activity and the associated environmental effects. Revocation was therefore not selected as the preferred option.

3.7 Selection of the Preferred Option

3.7.1 Having considered the reasonable alternatives available, daa identified amendment of the existing passenger capacity conditions to 40 mppa as the preferred form of Order for which to apply under the 2026 Act. The decision whether to make the Proposed Order, or a different form of Order, rests with the Minister in accordance with the 2026 Act.

3.7.2 In reaching this decision, daa had regard to its objectives, the planning and policy context, forecast passenger demand, the ability of the existing airport facilities, infrastructure and operational processes to accommodate passenger throughput, and the environmental considerations summarised in Table 3-1.

3.7.3 A passenger throughput limit below 40 mppa would generally have the potential for lower environmental effects but would not enable full use of the demonstrated operational capacity of the existing airport and would become constraining within a relatively short period, requiring further amendment or removal of the existing passenger capacity conditions. Conversely, revocation of the existing passenger capacity conditions would provide greater flexibility but would not establish an upper passenger throughput limit and would create greater uncertainty regarding the scale of future airport activity and its associated environmental effects.

3.7.4 A limit of 40 mppa was therefore considered to provide an appropriate balance between accommodating forecast passenger demand and making effective use of the level of passenger throughput that can be accommodated by the existing airport facilities, infrastructure and operational processes, while retaining a defined upper limit on passenger throughput. In the context of the Proposed Order, a 40 mppa limit was considered to provide a clear and proportionate basis for amendment of the existing passenger capacity conditions without prejudging any future application or statutory process concerning passenger throughput or airport development. Accordingly, daa determined that its application under the 2026 Act should seek amendment of the existing passenger capacity conditions to 40 mppa.

3.7.5 The likely significant environmental effects of the preferred option are assessed in the technical chapters of this EIAR.

3.8 Summary

3.8.1 This chapter has described the alternatives considered by daa through a two-stage process: first, in identifying the appropriate mechanism through which to address the existing passenger capacity conditions and, second, following identification of an application under the 2026 Act as the preferred mechanism, in determining the form and scope of the Order for which an application should be made.

3.8.2 In determining the form and scope of the Order, daa considered amendment of the existing passenger capacity conditions to a passenger throughput limit below 40 mppa, amendment to 40 mppa, and revocation (or amendment to >40mppa) of the existing passenger capacity conditions. The alternatives were considered having regard to daa's objectives, forecast passenger demand, the level of passenger throughput that can be accommodated by the existing airport facilities, infrastructure and operational processes, and their relative environmental implications.

3.8.3 Having considered these factors, daa identified amendment of the existing passenger capacity conditions to 40 mppa as the preferred form of Order for which to apply under the 2026 Act.