21. Potential Future Developments

21.1 Introduction

21.1.1 This chapter considers live consent processes and reasonably foreseeable future developments associated with Dublin Airport that may be relevant to the Proposed Order. The chapter explains how these have been taken into account within this Environmental Impact Assessment Report (EIAR), including through the Future Receiving Environment and cumulative assessment, where relevant.

21.1.2 Having regard to the provisions of the Dublin Airport (Passenger Capacity) Act 2026, the EIAR has been prepared in a manner consistent with the requirements of the EIA Directive and relevant Irish case law concerning reasonably foreseeable future development, including the principles established by the Supreme Court in Fitzpatrick v. An Bord Pleanála [2018] IESC 60. The purpose of this chapter is to consider whether any reasonably foreseeable future development forms an integral part of, is required to enable, or is legally or functionally interdependent with the Proposed Order such that it should be assessed as part of the same project. In accordance with the principles established in Fitzpatrick, consideration is also given, as far as practically possible, to later phases and other reasonably foreseeable future development associated with the longer-term growth of Dublin Airport, so that their probable or likely environmental effects can be taken into account at the earliest appropriate stage. The extent to which such development can be considered necessarily depends on the nature and level of definition of the future development and the information available at the time of assessment.

21.1.3 The likely significant environmental effects of the Proposed Order are identified through the Principal Assessment described in Chapters 4 and 5, which compares the 2029 Permitted Operation with the 2029 Proposed Operation. Applying the principles established in Fitzpatrick v. An Bord Pleanála [2018] IESC 60 and the criteria set out in paragraph 21.1.2, this chapter considers whether any reasonably foreseeable future development should be taken into account as part of the assessment of the Proposed Order and, where relevant, how its likely environmental effects have been addressed within this EIAR.

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21.2 Approach

Methodology

21.2.1 The assessment identifies live consent processes and reasonably foreseeable future developments that may be relevant to the identification of the significant effects of the Proposed Order. Each has been considered on a case-by-case basis to determine:

- whether it forms an integral part of, is required to enable, or is legally or functionally interdependent with the Proposed Order;
- whether it represents a later phase or other reasonably foreseeable future development whose probable or likely environmental effects can, as far as practically possible, be taken into account in the assessment of the Proposed Order;
- whether it has already been taken into account in the Principal Assessment or the Future Receiving Environment;
- whether any potential interaction with the Proposed Order is appropriately considered through the cumulative effects assessment in Chapter 20: In-Combination and Cumulative Effects; or

- whether it is a separate future development that does not form part of, is not required to enable, and is not legally or functionally interdependent with the Proposed Order.

21.2.2 This approach ensures that developments relevant to the assessment of the effects of the Proposed Order are identified and taken into account in a manner consistent with the principles set out above. This includes consideration of development that forms an integral part of, is required to enable, or is legally or functionally interdependent with the Proposed Order, together with later phases or other reasonably foreseeable future development whose likely environmental effects can, as far as practically possible, be taken into account. Separate or undefined future development that does not meet these criteria is not assessed as part of the Proposed Order.

Scope and Limitations

21.2.3 This chapter considers live consent processes and reasonably foreseeable future developments that may be relevant to the assessment of the effects of the Proposed Order. The assessment is necessarily based on the information available for those developments at the time of preparation of the EIAR. Speculative or undefined future development is not assessed. The chapter does not duplicate the cumulative effects assessment presented in Chapter 20: In-Combination and Cumulative Effects, which considers cumulative effects and interactions with other relevant developments.

21.3 Assessment of Potential Future Developments

Introduction

21.3.1 This section applies the assessment framework described above to live consent processes and reasonably foreseeable future developments. The assessment considers whether and how these have been appropriately taken into account within the EIAR, having regard to their relationship with the Proposed Order and the information available at the time of assessment.

Infrastructure Application

21.3.2 The Infrastructure Application (IA) is a live planning application seeking planning permission for a range of infrastructure projects intended to support the future operation and development of Dublin Airport, including improvements to passenger facilities, aircraft handling infrastructure and other operational infrastructure. The IA is supported by its own EIAR and is being progressed through a separate statutory planning process.

21.3.3 The IA and the Proposed Order are both seeking to address the existing 32 mppa passenger capacity restriction at Dublin Airport. The IA seeks planning permission to increase the permitted passenger capacity from 32 mppa to 40 mppa alongside a range of physical airport infrastructure projects. The Proposed Order separately seeks the amendment of the existing passenger capacity restriction and does not provide for physical airport development.

21.3.4 The Principal Assessment of the Proposed Order has been undertaken on the basis that the 2029 Proposed Operation, comprising passenger throughput of 40 mppa, can be accommodated using existing and permitted airport infrastructure. The additional physical infrastructure proposed through the IA is therefore not required to enable the 2029 Proposed Operation and does not form part of the Principal Assessment.

21.3.5 Where relevant, the assessment of the Proposed Order and the IA draw upon consistent assumptions regarding the future operation of Dublin Airport. This reflects the common operational context within which the two proposals have been developed but does not mean that implementation of the Proposed Order is dependent upon the IA.

21.3.6 The IA is a separate development subject to its own statutory consent process and environmental assessment. Pursuant to Section 26 of the Dublin Airport (Passenger Capacity) Act 2026, any subsequent decision by FCC or ACP on an application which includes the amendment or revocation of the passenger capacity conditions would supersede the Proposed Order. Accordingly, the Proposed Order and the IA would not operate concurrently and there is no requirement to assess cumulative effects between them.

Airport Drainage Masterplan

21.3.7 The Airport Drainage Masterplan (DMP) establishes a long-term strategy for the management and enhancement of the surface water drainage network at Dublin Airport. It identifies a programme of drainage improvements intended to improve the resilience, capacity and environmental performance of the airport's drainage infrastructure over time.

21.3.8 The Airfield Drainage Project (ADP) comprises defined drainage infrastructure works identified in the context of the wider drainage strategy for Dublin Airport. The ADP has been progressed separately from the Proposed Order and has been subject to its own planning and environmental assessment process.

21.3.9 Neither the ADP nor the wider programme of potential future drainage improvements identified through the DMP is required to enable the 2029 Proposed Operation and neither forms part of the Principal Assessment. The Principal Assessment has been undertaken on the basis that the 2029 Proposed Operation can be accommodated without reliance on these works.

21.3.10 The ADP and other existing, approved or planned drainage projects are considered, where relevant, in the cumulative assessment in Chapter 20: In-Combination and Cumulative Effects. Potential future drainage works identified only as a strategic or indicative level within the DMP are not treated as cumulative developments where they are not sufficiently progressed to constitute an existing, approved or planned project.

Cargo Relocation Project

21.3.11 The Cargo Relocation Project comprises a separate development proposal to relocate existing cargo facilities within Dublin Airport to support the future operation of the airport. The project is being progressed through a separate statutory consent process and is supported by its own environmental assessment, where required.

21.3.12 The Cargo Relocation Project does not form part of the Proposed Order and is not required to enable the 2029 Proposed Operation. The Principal Assessment has therefore been undertaken independently of the Cargo Relocation Project, which does not form part of the operational assumptions underpinning that assessment.

21.3.13 The Cargo Relocation Project is therefore a separate development capable of being progressed independently through its own statutory consent process. Where relevant, potential cumulative effects between the Cargo Relocation Project and the Proposed Order are considered in Chapter 20: In-Combination and Cumulative Effects.

Other Reasonably Foreseeable Future Development

21.3.14 In addition to the developments considered above, Dublin Airport will continue to evolve through a range of operational, maintenance and infrastructure activities undertaken to support the safe, efficient and sustainable operation of the airport. Such activities may comprise routine operational works undertaken as part of the ongoing management of the airport or separate development proposals subject to their own statutory consent processes and environmental assessment requirements, where applicable.

21.3.15 Longer-term airport development is identified through the Dublin Airport Capital Investment Programme (CIP), which provides a framework for future investment in airport infrastructure. The programme encompasses a range of potential infrastructure projects at varying stages of development and definition. The extent to which their environmental effects can be assessed depends on the information currently (i.e., at the time of preparation of this EIAR) available concerning their nature, location, scale, design and anticipated implementation. Where individual projects have progressed sufficiently to constitute existing, approved or planned developments, their potential cumulative effects with the Proposed Order are considered, where relevant, in Chapter 20: In-Combination and Cumulative Effects. Other longer-term proposals remain subject to further design development, programme definition and, where applicable, separate statutory consent and environmental assessment processes. Their potential environmental implications have therefore been considered at a strategic level, as far as practically possible having regard to the information available.

21.3.16 The Principal Assessment has been undertaken on the basis of the 2029 Permitted Operation and 2029 Proposed Operation described in Chapters 4 and 5. Any future airport infrastructure or operational development that is not required to enable the 2029 Proposed Operation does not form part of the Proposed Order or the Principal Assessment. Where sufficiently defined and relevant, the potential for cumulative effects with such development is considered in Chapter 20: In-Combination and Cumulative Effects.

21.3.17 Third-party infrastructure projects in the wider Dublin Airport area, including MetroLink and other strategic transport infrastructure, are being progressed independently through their own statutory consent processes and environmental assessment requirements. Where these projects are expected to be operational by the assessment year, they have been taken into account in defining the Future Receiving Environment, where relevant. Where appropriate, their potential to give rise to cumulative effects with the Proposed Order is considered separately in Chapter 20: In-Combination and Cumulative Effects. These projects do not form part of the Proposed Order and are therefore not considered further within this chapter.

21.3.18 Accordingly, no other reasonably foreseeable future development has been identified that forms part of, or is required to enable, the Proposed Order.

Passenger Growth

21.3.19 The Proposed Order seeks the amendment of the existing passenger capacity restriction applying at Dublin Airport. The Principal Assessment assesses the environmental effects of the Proposed Order by comparing the 2029 Permitted Operation, based on passenger throughput of 32 mppa, with the 2029 Proposed Operation, based on passenger throughput of 40 mppa.

21.3.20 The 2029 Proposed Operation represents the maximum passenger throughput that would be permitted under the amended passenger capacity restriction and provides the defined basis for identifying and assessing the likely significant environmental effects of the Proposed Order.

21.3.21 Any future proposal to increase passenger throughput beyond 40 mppa would fall outside the scope of the Proposed Order and would require a further change to the applicable passenger capacity restriction. The nature and environmental effects of any such future proposal would be considered through the relevant statutory consent and environmental assessment processes at that time.

21.3.22 Accordingly, passenger growth beyond 40 mppa does not form part of the Proposed Order and does not require assessment within this EIAR.

21.3.23 Notwithstanding this, it is possible to identify, at a strategic level, the types of environmental effects that may arise should a future proposal for passenger growth beyond 40 mppa be brought forward. These high-level considerations are summarised in Table 21-1. They are intended to illustrate the potential direction of environmental change only and do not represent an assessment of a defined future development proposal.

Table 21-1: High-Level Environmental Considerations for Longer-Term Airport Development

Environmental Topic	High-Level Consideration
Aircraft Noise	Any future proposal for passenger growth beyond 40 mppa could result in changes to aircraft movements and associated noise exposure. The nature and extent of any effects would depend on the characteristics of the future proposal, including aircraft movements, fleet mix, operational procedures and the regulatory framework applicable at that time.
Air Quality	Any future proposal for passenger growth beyond 40 mppa could result in changes in emissions associated with aircraft activity and surface access. The nature and extent of any effects would depend on the characteristics of the future proposal and future changes in aircraft and vehicle technology, fleet composition and wider emissions trends.
Climate	Any future proposal for passenger growth beyond 40 mppa could result in changes in aviation-related greenhouse gas emissions. The magnitude of any effects would depend on the characteristics of the future proposal and the technological, policy and regulatory context applicable at that time.
Surface Access and Traffic	Any future proposal for passenger growth beyond 40 mppa could result in changes to surface access demand. The nature and extent of any effects would depend on the characteristics of the future proposal, travel behaviour and the public transport and highway networks available at that time.
Water Environment	Any future development associated with passenger growth beyond 40 mppa may require additional or altered infrastructure, with potential implications for drainage and water management. The nature and extent of any effects would depend on the location, scale and design of any future development.
Other Environmental Topics	Potential effects on biodiversity, landscape, cultural heritage, land and soils, population and human health and other environmental topics would depend on the nature, location, scale and design of any future development and cannot be meaningfully assessed in the absence of a defined proposal.

21.3.24 Any future proposal to increase passenger throughput beyond 40 mppa falls outside the scope of the Proposed Order and would be subject to the relevant statutory consent and environmental assessment requirements at that time.

21.3.25 Accordingly, no future development to enable passenger growth beyond 40 mppa, has been identified that forms part of, or is required to enable, the Proposed Order. Nor has any future development been identified that is functionally or legally interdependent with the Proposed Order such that it should be assessed as part of the Proposed Order for the purposes of EIA.

21.4 Summary and Conclusions

21.4.1 Table 21-2 summarises the live consent processes and other reasonably foreseeable future Dublin Airport developments considered in this chapter, their relationship to the Proposed Order and how they have been addressed within the EIAR.

Table 21-2: Summary of Future Development Considerations

Development	Relationship to the Proposed Order	Outcome of Assessment
IA	Separate proposal for airport infrastructure subject to its own statutory consent process and supported by its own EIAR. The IA is not required to enable the Proposed Order.	Does not form part of the Proposed Order or Principal Assessment. Any subsequent decision on the IA which amends or revokes the passenger capacity conditions would supersede the Proposed Order and, accordingly, the two would not operate concurrently.
Airport Drainage Masterplan / Airfield Drainage Project	Strategic drainage framework and associated defined drainage project. Neither the DMP nor the ADP is required to enable the Proposed Order.	Does not form part of the Proposed Order or Principal Assessment. The ADP and other relevant existing, approved or planned drainage projects are considered, where appropriate, in Chapter 20: In-Combination and Cumulative Effects. Other potential future drainage works identified only at a strategic or indicative level through the DMP are not treated as cumulative developments where they have not progressed to that stage.
Cargo Relocation Project	Separate development proposal subject to its own statutory consent process. The project is not required to enable the 2029 Proposed Operation.	Does not form part of the Proposed Order or Principal Assessment. Potential cumulative effects with the Proposed Order are considered, where relevant, in Chapter 20: In-Combination and Cumulative Effects.
Other Reasonably Foreseeable Future Development	Other airport development is not required to enable the 2029 Proposed Operation. Third-party infrastructure may form part of the Future Receiving Environment, where relevant.	Does not form part of the Proposed Order or Principal Assessment. Where appropriate, future developments are taken into account through the Future Receiving Environment or cumulative effects assessment in Chapter 20: In-Combination and Cumulative Effects, or would be subject to their own future statutory consent and environmental assessment requirements.
Passenger growth beyond 40 mppa	Would fall outside the scope of the Proposed Order, which would amend the passenger capacity restriction from 32 mppa to 40 mppa.	Any future proposal to increase passenger throughput beyond 40 mppa would require a further change to the applicable passenger capacity restriction and would be subject to the relevant statutory consent and environmental assessment requirements at that time.

21.4.2 Having regard to the assessment methodology described in Section 21.2, this chapter has considered live consent processes and reasonably foreseeable future developments that may be relevant to the Proposed Order.

21.4.3 The IA is not required to enable the 2029 Proposed Operation and does not form part of the Proposed Order or Principal Assessment. Any subsequent decision on the IA which amends or revokes the passenger capacity conditions would supersede the Proposed Order and, accordingly, the two would not operate concurrently. The DMP, ADP, Cargo Relocation Project and other identified future developments are not required to enable the 2029 Proposed Operation and do not form part of the Proposed Order or Principal Assessment. Where relevant, these developments have been taken into account through the Future Receiving Environment or the cumulative effects assessment presented in Chapter 20: In-Combination and Cumulative Effects, or would be subject to their own statutory consent and environmental assessment requirements.

21.4.4 The Proposed Order would amend the existing passenger capacity restriction from 32 mppa to 40 mppa. The Principal Assessment therefore provides a defined basis for assessing the likely significant environmental effects of the Proposed Order by comparing the 2029 Permitted Operation with the 2029 Proposed Operation. Any future proposal for passenger growth beyond 40 mppa would fall outside the scope of the Proposed Order and would be subject to the relevant statutory consent and environmental assessment requirements at that time.

21.4.5 Accordingly, no live consent process or reasonably foreseeable future development, to enable passenger growth beyond 40 mppa, has been identified that forms part of, or is required to enable, the Proposed Order, or is functionally or legally interdependent with it such that it should be assessed as part of the Proposed Order for the purposes of EIA. The Proposed Order has therefore been appropriately defined for the purposes of EIA and has not been artificially separated from other development proposals, having regard to the principles established in *Fitzpatrick v. An Bord Pleanála*.