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First Party Appeal to An Coimisiún Pleanála Report on Transport and Engineering

Proposed Aviation Related Cargo Handling Units at Huntstown, Swords, Co Dublin

February 2026

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AN COIMISIÚN PLEANÁLA
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Comments

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1. Introduction

1.1 Background

Waterman Moylan together with CWPA, Planning Consultants and Architects have been appointed by D. A. Terminal 3 Limited to prepare an engineering report to accompany a first party appeal to An Coimisiún Pleanála in respect of the decision of Fingal County Council on 9th January 2026 to refuse planning permission for a proposed Aviation Related Cargo Handling Units and associated development at Huntstown, Swords, Co Dublin, Planning Register Reference: FW25A/0409E.

This report addresses the Transport and Engineering issues of the appeal.

1.2 Transport

The transport elements of this report are set out in Section 2.0 and comprise:

(a) Overview of Transport Issues.

In this regard, the roads and access strategy for the site will be set out, specifically in the context of Reason No. 2 of the Decision to Refuse Permission set out below:

The proposed development is located proximate to lands west of runway 16/34 indicated in the Dublin Airport Local Area Plan as a potential location for a third terminal (T3). The Planning Authority is not satisfied, on the basis of the information submitted that the proposed development would not prejudice the orderly operation and continued growth of the Airport including the provision of a third terminal and the provision of a western access route to Dublin Airport from the N2 corridor. The proposal is considered to be piecemeal and developer led and fails to present a comprehensive and cohesive approach in ensuring sustainable growth at the Airport is safeguarded. The proposed development is contrary to DA01, DA02 of the Fingal Development Plan 2023-2029 and EI03, TP03 & EA05 of the Dublin Airport Local Area Plan and would therefore, be premature and contrary to the proper planning and sustainable development of the area.

(b) Response to the recommended three items of additional information set out in the Planning Report prepared by the Transport Planning Section of Fingal County Council in December 2025.

1.3 Engineering

The engineering section of this report, Section 4.0, addresses the three suggested reasons for refusal in respect of foul drainage as set out in the Planning Report prepared by the Water Services Department of Fingal County Council in December 2025. Reason No. 5 of the Decision to Refuse Permission is set out below:

Reason: The proposed development is considered premature due to the absence of Uisce Éireann infrastructure in the proximity of the site. It is considered that the proposed private wastewater treatment system is neither applicable, appropriate, nor adequate with regards to the scale of the proposed development and would be contrary to Objective DMSO196 of the Fingal Development Plan 2023- 2029.

2. Overview of Transport Issues

2.1 Background

The proposed development which is the subject of this First Party Appeal to An Coimisiun Pleanala is the initial phase in the westward expansion of Dublin Airport. The expansion will take place over a number of phases which will include a passenger terminal, car parking, hotel and cargo handling facilities, both airside and landside.

It is not reasonable or feasible that all phases of the expansion would take place together and become operational at the same time. The nature of large scale masterplan development is such that some phases will be completed and operational before others.

In the case of the subject development, the landside facilities are likely to be complete and operational before the airside facilities. To facilitate this offset in completion dates, some temporary facilities and measures are likely to be required.

In the case of the subject development, the landside warehouses are expected to become operational before the adjoining airside apron and as a result, interim short term shuttle transfer of air freight containers between the subject development and the existing airside cargo handling facilities at Dublin Airport are likely to be required.

Traffic generated by the temporary cargo shuttle will represent a very small proportion of the traffic generated from the subject site with staff and ISO containers to and from customers routed via the existing road network to the west of the airport.

As the various elements of development come on stream, the temporary cargo shuttle will be phased out and the existing road network will be supplemented by a number of new road links including the Western Access Route to the M2 at Cherryhound Interchange.

2.2 Dublin Airport Local Area Plan

The subject site is located within the *Dublin Airport Local Area Plan 2020* which provides the principal development management tool for the Airport area. It also specifies the long-term disposition and mixes of uses within the designated Airport area together with infrastructural development necessary to support these uses.

Section 7.2.7 Terminal 3

Section 7.2.7 on Page 50 of the LAP identified a location for Terminal 3 on the subject lands to the west of runway 16/34. The target delivery date set out in the is 2031 some 11 years after the Plan was published. See Figure 1 which is an extract from Dublin Airport LAP 2020 Fig 7.1 Future Capacity Needs.

Figure 1 Locations for Terminal 3 at Dublin Airport

(Extract from Dublin Airport LAP 2020 Fig 7.1 Future Capacity Needs)

Section 8.2.3 External Road Access

Section 8.2.3 on Page 59 of the LAP notes that *'In the medium term, an Airport Western Access Route would cater for significant forecast passenger levels.'* See Figure 2 which is an extract from Dublin Airport LAP Figure 8.1 Dublin Airport Surface Access

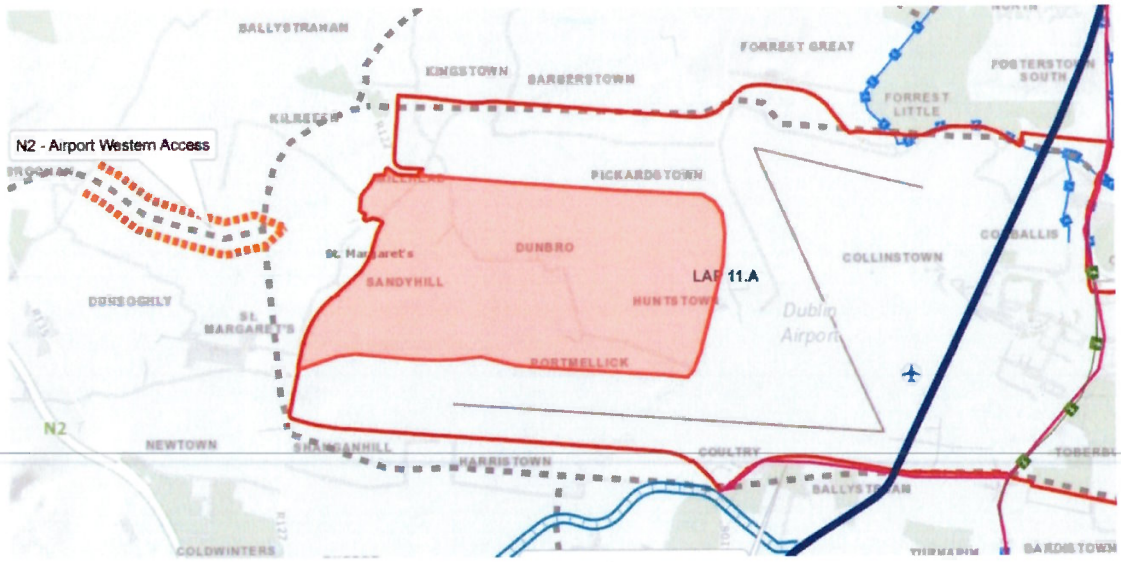

Figure 2 Dublin Airport Western Surface Access

(Extract from Dublin Airport LAP Figure 8.1 Dublin Airport Surface Access)

Section 8.8.2 Metrolink

It is a key priority for Fingal County Council to deliver Metrolink including the proposed Dublin Airport station to be located at the Ground Transportation Station just north of Terminal 2. See Figure 3 which is an extract from Diagram 1 Metrolink EIAR Non-Technical Summary.

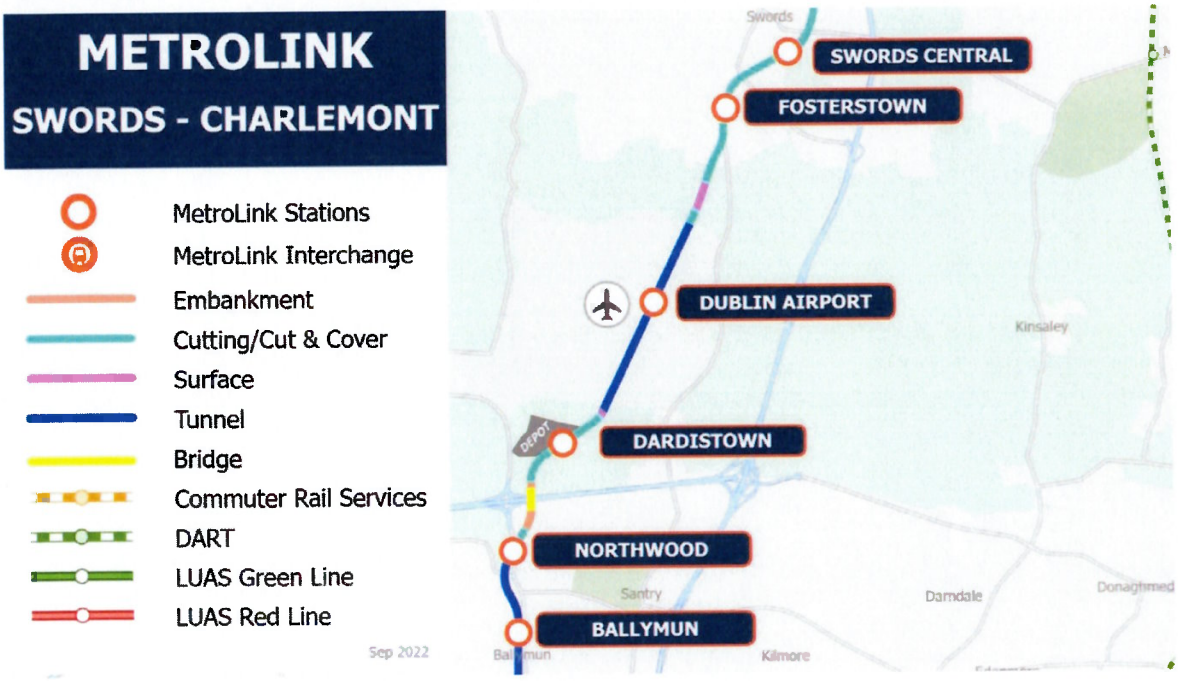

Figure 3 Metrolink at Dublin Airport and Dardistown

(Extract from Diagram 1 Metrolink EIAR Non-Technical Summary)

2.3 Western Campus Masterplan

CWPA, Planning Consultants and Architects and Waterman Moylan, Engineering Consultants have been appointed by D. A. Terminal 3 Limited to prepare a masterplan for the western campus lands at Dublin Airport, and which specifically includes for the provision of the airport related uses in line with the requirements of the Dublin Airport Local Area Plan:

- A c. 2.4km dual carriageway roadway from the N2(M2) Cherryhound Interchange to the R122 roadway together with the provision of upgrades of the R122 and the provision of access junctions along the route.
- A c. 2.0km extension of this roadway to the proposed T3 Airport Terminal Building
- Provision for pedestrian and cycle facilities / links to the Terminal as part of the upgrade works
- Provision of a transport interchange at the Terminal facility to cater for bus, taxi, bicycle interchange, and with allowance for shuttle bus links to the future MetroLink stops at Dublin Airport and Dardistown.
- Long and short-term cycle parking facilities for staff, passengers and visitors

- Long and short-term private car parking facilities for staff, passengers and visitors
- Car hire facilities
- Hotels with conference facilities
- Office development
- Logistics / cargo facilities

This Western Campus Masterplan, which shows the locations of each of these elements is shown in Figure 4 below.

Figure 4 Western Campus Masterplan

2.4 Phasing

In order to address the need for airport related cargo handling facilities at Dublin Airport, it is proposed that the first phase of development be the relatively low traffic generating cargo handling facility on the lands adjacent the future Apron 7. This cargo handling facility is the subject of this First Party Appeal.

As set out in the TTA for this development, the nature of the development is such that trips are spread evenly across the day, and by locating the facility west of the airport, between the runways a significant portion of trips will be via the N2(M2) Cherryhound and M50 Ballymun thereby reducing the impact on the M1 access to the airport, whilst facilitating the future provision of airside links.

Two of the four cargo handling units proposed have been designed to back directly onto the future Apron 7 to facilitate future direct airside links.

The second phase of development will be the proposed western access roadway which will connect the site for the Western Airport Campus including Terminal 3 and the subject development to the M2 (N2) Motorway at Cherryhound interchange.

This proposal aligns with recommendations of the South Fingal Transport Study in relation to Dublin Airport which advise *"In the longer term, a western access route to Dublin Airport would cater for 38mppa+ level*

of demand and offer a separate route into Dublin Airport independent of the eastern spur access. A new link from the N2 is recommended in the context of the airport terminal and/or parking facility expansion to the west. In the context of future expansion at Dulin Airport, the Western Access would provide access to the car parks only, with the final leg of the trip completed by shuttle bus to the terminals."

In other words, the Western Access Route is required to serve the future major trip generators such as passenger car parking together with the future terminal building (and not other airport related development such as cargo handling facilities which will not lead to any change in passenger numbers, either an increase or a decrease).

The third and subsequent phases will see the delivery of the terminal and other terminal related development, including offices, hotel and other facilities.

2.5 Operations:

The operation of the proposed development will provide for four streams of cargo. The four streams are: -

- Stream 1 Inbound by plane to the exiting cargo apron at Dublin Airport (short term).

  Transfer to proposed warehouses by cargo shuttle (short term)

  Inbound by plane to future Apron 7 (long term).

  Transfer to proposed warehouses by forklift / transporter (long term).
- Stream 2 Outbound from the warehouses by truck/van via the Western Access Route.
- Stream 3 Inbound by truck/van to the warehouses via the Western Access Route.

  Transfer by cargo shuttle to Dublin Airport (short term) and by forklift / transporter to Apron 7 (long term).
- Stream 4 Outbound by plane from Dublin Airport (short term) and Apron 7 (long term).

Stream 1

Cargo will arrive by plane to Dublin Airport. The planes will park on the existing apron in the short term and on Apron 7 in the long term. Air freight containers will be transferred by forklift or transporter to the shuttle service in the short term and to one of the four proposed warehouses in the long term.

Stream 2

Cargo from the inbound air freight containers will be sorted in one of the four warehouses and loaded into ISO containers for delivery by truck to the customer. Trucks will depart from the warehouses via the Western Access Route.

Stream 3

ISO Containers from customers will arrive to the proposed warehouses by truck via the Western Access Route. Cargo will be sorted and transferred to air freight containers.

Stream 4

In the short term, outbound cargo in air freight containers will be transferred by cargo shuttle to Dublin Airport and loaded onto cargo planes.

In the long term, outbound cargo will be transferred to planes parked on Apron 7 by forklift or transporter.

2.6 Interaction and Routes

In the long term, the proposed development will be self-contained insofar as the transfer of cargo between the warehouses and planes is concerned.

In the short term pending completion of Apron 7, any interaction between the proposed development and the existing cargo handling operations of Dublin Airport would be low level and a minimal traffic generator.

2.7 Response to FCC Refusal

Reason No. 2 of the Decision to Refuse Permission is set out below:

- *The proposed development is located proximate to lands west of runway 16/34 indicated in the Dublin Airport Local Area Plan as a potential location for a third terminal (T3). The Planning Authority is not satisfied, on the basis of the information submitted that the proposed development would not prejudice the orderly operation and continued growth of the Airport including the provision of a third terminal and the provision of a western access route to Dublin Airport from the N2 corridor. The proposal is considered to be piecemeal, and developer led and fails to present a comprehensive and cohesive approach in ensuring sustainable growth at the Airport is safeguarded. The proposed development is contrary to DA01, DA02 of the Fingal Development Plan 2023-2029 and EI03, TP03 & EA05 of the Dublin Airport Local Area Plan and would therefore, be premature and contrary to the proper planning and sustainable development of the area.*

Waterman Moylan have undertaken a review of the Transportation Department report prepared in respect of the subject application. It is noted that the report advises that:

In the General section, the report notes that congestion in relation to surface access is a constraint at Dublin Airport and as such, the Dublin Airport Local Area Plan 2020 advises that, on the eastern side of the campus such as M1, M50 and M1/M50, congestion is common and the overreliance on a single access without redundancy needs to be addressed. It notes the need for improved mobility measures, external road network interventions and improved public transport. This section concludes that the proposed development presents *"a piecemeal approach to development at the Airport and does not present a comprehensive and cohesive approach in ensuring sustainable growth at the Airport is safeguarded."*

In this regard, we would note that, as set out in Section 2.3 of this report, a comprehensive masterplan has been developed, which sets out an appropriate phasing strategy for the western campus lands, including the delivery of the western access roadway in advance of the delivery of the major car generating elements in line with the South Fringe Study. See Figure 4 Western Campus Masterplan above.

Other items considered in the FCC report on the subject application include:

- That the sightlines should be amended to comply with TII requirements (i.e. increased from 59m to 90m).
- The car parking levels should be reduced to promote sustainable travel. The applicants are happy to accept a condition in this regard.
- Bicycle parking, motorcycle parking and the layout are all acceptable.
- It is also requested that Road Safety Audit be undertaken, and this has now been completed and is attached in Appendix B of this report.

The Transportation and Transportation section has also requested that the scope be extended to include a wider road network, as well as providing greater detail on the proposed operation. These were included in the recommended additional items and are addressed in Section 3.4 of this report.

2.8 Summary

In the long term, cargoes would not be transferred between the proposed development and the existing cargo handling operations at Dublin Airport. As a consequence, there would not be any routes for trips between the airport and the proposed development.

In the short-term pending the completion of Apron 7, cargoes would be transferred by a temporary cargo shuttle between the airport and the proposed development.

The Transportation Department's report concludes:

- that in order to promote passenger growth a western access is required - however, we note that as set out in the masterplan and phasing plan, the subject development does not include any proposals to increase passengers numbers, and indeed, includes for the provision of a western access in advance of any such developments, including the terminal building and associated parking
- that the develop is remote from public transport – however we note there is scope to extend public transport routes to the western campus in the medium term and to provide shuttle bus links to public transport routes in the short term
- that the development is piecemeal – however we note, a logical, phased development of the western campus has been developed which includes for a portion of cargo handling as a first phase
- that 3 No. additional information request items should be included in any additional information request issued in respect of the subject site – these relate sightlines, road safety audit and traffic and transport assessment.

Section 3.0 of this report address the matters raised in the additional information request items in detail to demonstrate how these matters can be addressed.

3. Review of Recommended Transport Additional Information Items

3.1 Introduction

The FCC Transportation Department Report includes for 3 no. items to be addressed by way of further information should an AI request be issued. The items relate to:

- Sightlines
- Road Safety Audit
- Traffic and Transportation Assessment

The requests have been reviewed and responded to below.

3.2 Additional Information Item No. 1 – Sightlines

3.2.1 Request

The applicant is requested to provide a revised sightline drawing demonstrating sightlines for a 60km/hr speed limit, as per the requirements of DN-GEO-03060 as published by Transport Infrastructure Ireland (TII); which is a minimum sightline of 90m visibility to the nearside edge of the road both sides of the entrance, viewed from a 2.4m setback from the edge of the road.

3.2.2 Response

The planning application submitted to Fingal County Council in November included Waterman Moylan Drg No HT3-WAT-ZZ-XX-DR-P-01400-01401 showing the following sightlines: -

- Site Access 60 kph 2.4m x 59m
- Internal Roads 50 kph 2.4m x 45 m

These sightlines were based on the requirements of the Department of Transport 'Design Manual for Urban Roads and Streets'(DMURS).

On the basis that the subject site is not located in an urban area, Fingal County Council require that the sightlines at the entrance from the R108 to the proposed development comply with the requirements of TII publication DN-GEO-03060 *Geometric Design of Junctions*. This standard provides design requirements and guidance for national roads including junction and access layouts on regional and local roads.

The required sightlines for a design speed of 60 kph as specified by FCC are 90m at a setback of 3.0m.

This report is accompanied by Waterman Moylan Drg No HT3-WAT-ZZ-XX-DR-P-01400-01402 showing compliant sightlines at the site access from the R108.

This drawing is included in Figure 5 and in Appendix A of this document shows clear and unobstructed sightlines in both directions at the location of the proposed access.

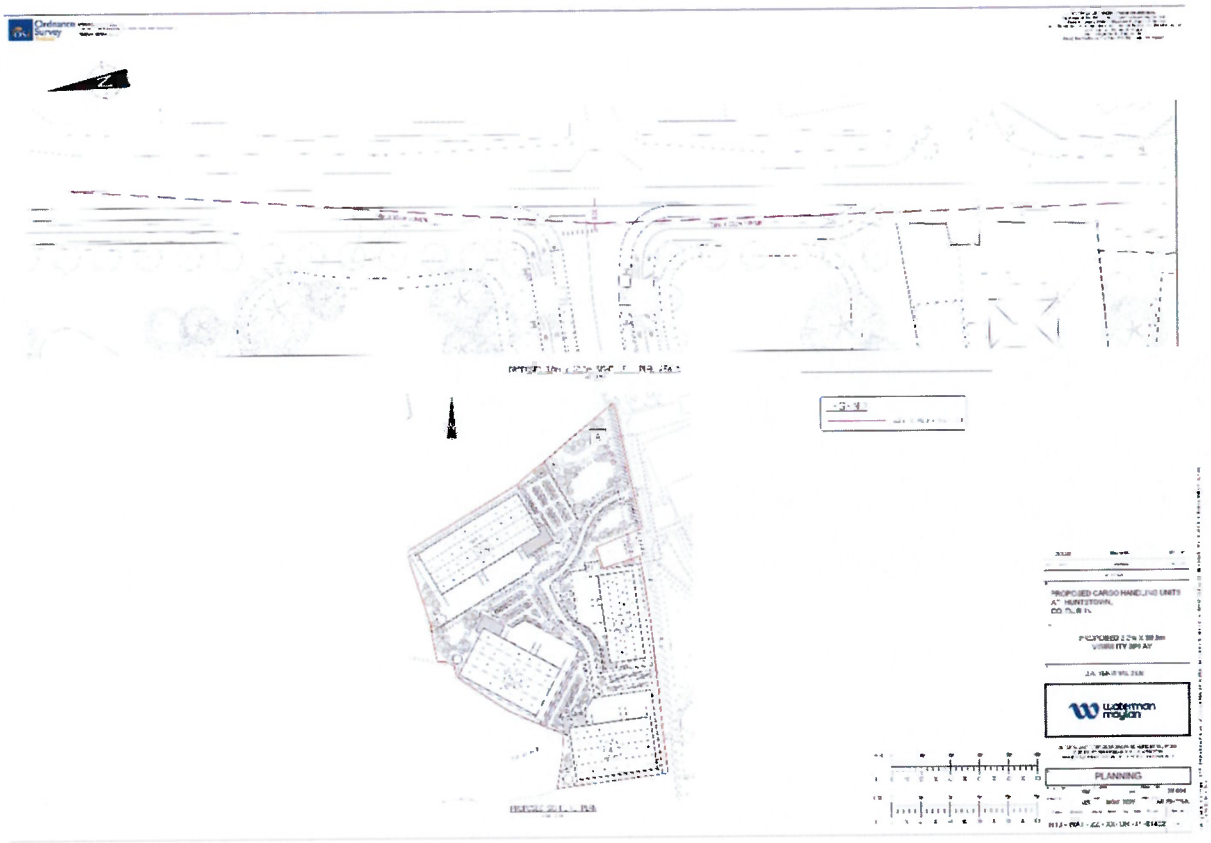

Figure 5 Waterman Moylan Drg No 1402 Sightlines at Proposed Access

3.3 Additional Information Item No. 2 – Road Safety Audit

3.3.1 Request

The applicant is requested to provide a 'Stage 1 Road Safety Audit', to the requirements outlined in the Transportation Infrastructure Ireland guidelines on road safety audits.

3.3.2 Response

A Stage 1 Road Safety Audit for this development was commissioned from Bruton Consulting Engineers in October 2025. For logistical reasons, it did not accompany the planning application lodged with Fingal County Council on 7th November 2025. A copy of the completed Stage 1 Road Safety Audit prepared by Bruton Consulting Engineers in November 2025 is included in Appendix B of this report.

A copy of the Feedback Form for the Road Safety Audit, the responses to which have been accepted by the Auditor is also included within the completed Stage 1 Road Safety Audit.

The applicants confirm their intention to implement the recommendations of the Road Safety Audit as set out in the Feedback Form.

3.4 Additional Information Item No. 3 – Traffic and Transportation

3.4.1 Request – South Fingal Transport Study

The applicant is requested to be further develop the 'Traffic and Transport Assessment Report' to address the following items:

- DA LAP Objective SF02

  Implement the recommendations of the South Fingal Transport Study in relation to Dublin Airport in order to ensure that a balanced response to the expansion of Dublin Airport occurs. It shall be a requirement that any planning applications to increase passenger numbers or that result in an increased demand for travel, shall clearly demonstrate the required transport infrastructure and measures to accommodate the proposed increase in line with the recommendations of the South Fingal Transport Study.

3.4.2 Response

The recommendations of the South Fingal Transport Study in relation to Dublin Airport comprise

- In the longer term, a western access route to Dublin Airport would cater for 38mppa+ level of demand and offer a separate route into Dublin Airport independent of the eastern spur access. A new link from the N2 is recommended in the context of the airport terminal and/or parking facility expansion to the west. In the context of future expansion at Dulin Airport, the Western Access would provide access to the car parks only, with the final leg of the trip completed by shuttle bus to the terminals.
- The provision of public transport orbital connectivity to help reduce car dependency for trips not travelling to the city but to major potential employment areas along the R139, onward to Dublin Airport and Swords.
- Cycle improvements along the R139 up to and including Stockhole Lane for travel to Dublin Airport and Swords.

The recommendations of the Study are illustrated in Figure 6 which is a reproduction of Figure 39 from the South Fingal Transport Study.

The proposed development will not lead to any change in passenger numbers, either an increase or a decrease.

7.7 Dublin Airport Surface Access Recommendations Map

Figure 39. Dublin Airport Surface Access Short Term Recommendations

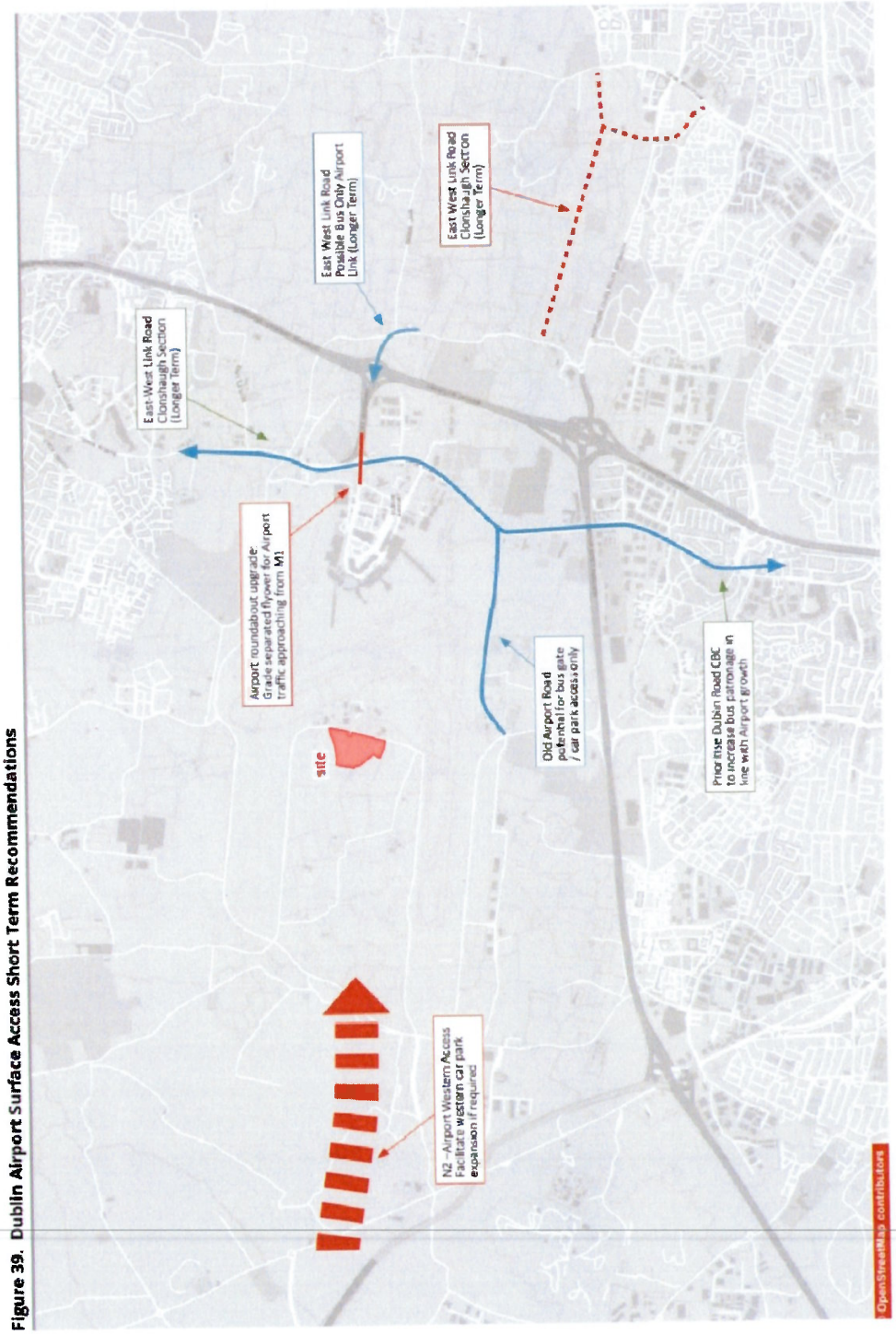

Figure 6 South Fingal Transport Study Recommendations Figure 39

3.4.3 Request – Junction Assessment

The applicant is requested to be further develop the 'Traffic and Transport Assessment Report' to address the following items:

- *Traffic and Transport Assessment report should include an assessment (and associated traffic surveys/counts) of all of the junctions located between the proposed development and the existing airport cargo facility; and the nearby junctions with the N2 and the M50, including the following junctions:*

  (5) Junction of the R108 with Collinstown Lane (Old Airport Road)

  (6) Junction of the R132 with Collinstown Lane (Old Airport Road)

  (7) Junction of the R132 with the Corballis Road South (i.e. adjacent to ALSAA)

  (8) Airport Roundabout

  (9) Junction of the R108 with the M50

  (10) Junction of the R135 with the L-3125 (Kilshane Cross).

Note: Numbers for Junctions 5 – 10 added by Waterman Moylan for the purposes of this report.

3.4.4 Response

Background to TTA

Junctions 1 – 4 assessed in the TTA for this development which accompanied the planning application to Fingal County Council are highlighted in red in Figure 7 below. These were the junctions at which the increase in traffic from the proposed development was predicted in the TTA to exceed 5% of the traffic on the adjoining road. The results for Junction 5 were not included in the original TTA but have now been assessed as part of this response as the results have been subsequently shown to exceed 5%. See Table 1.

The additional five junctions 6 – 10 listed in the FCC Planning Report are highlighted in blue on Figure 7 below. Traffic increase was not predicted to exceed 5% at these junctions. See Table 2.

Scope of TTA

The TTA was based on the premise that, in the short term, there would not be a direct airside connection between the cargo unloading areas on Apron 7 and the proposed development.

In such a scenario, the transfer of air freight containers between the cargo planes on the airport apron and the proposed warehouses would take place by temporary cargo shuttle via the public road network, through Junctions 6 – 8 which are highlighted in blue on Figure 3. Junctions 6 – 8 are three of the six junctions listed by Fingal County Council in the Planning Report.

In the longer term, there would be a direct airside connection between the cargo unloading area on Apron 7 and the proposed development.

Commissioning of Apron 7 would trigger the end of the temporary cargo shuttle. From then on, it would not be necessary to use the public road network for the transfer of air freight containers between cargo planes and the proposed warehouses.

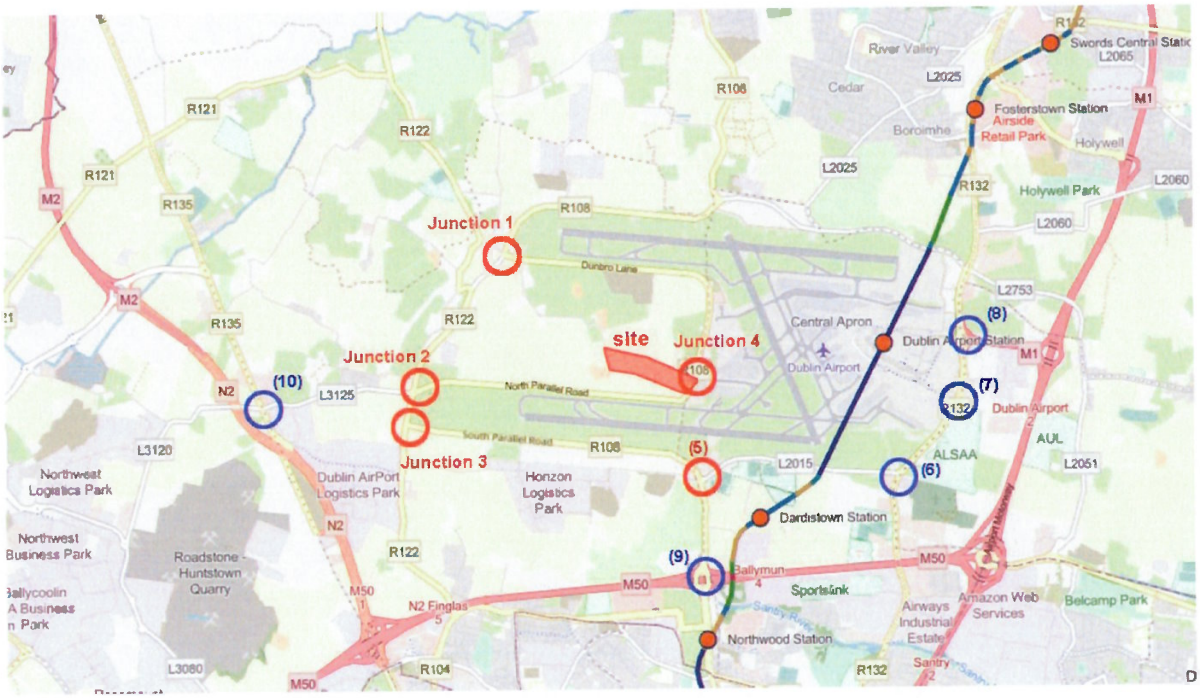

Figure 7 Locations of Junctions 1 - 10

Trip Generation and Distribution

The trip generation and distribution for this project was set out in Section 9.0 of the TTA which accompanied the planning application. During the preparation of this report, Figure 17 development was extended to the east to incorporate Junctions 5 – 10 listed by Fingal County Council.

The trips for Junctions 5 – 9 included the temporary traffic movements based on the transfer of incoming and outgoing cargo by cargo shuttle between the existing apron at Dublin Airport and the warehouses at the proposed development

Dublin Airport handles some 144,000 tonnes of air freight per annum 20 – 30 cargo flights per day. For the proposed development on the subject site, these flights would generate up to 2 return trips in the AM Peak Hour 8 - 9 and a similar number of trips in the PM Peak Hour 5 – 6.

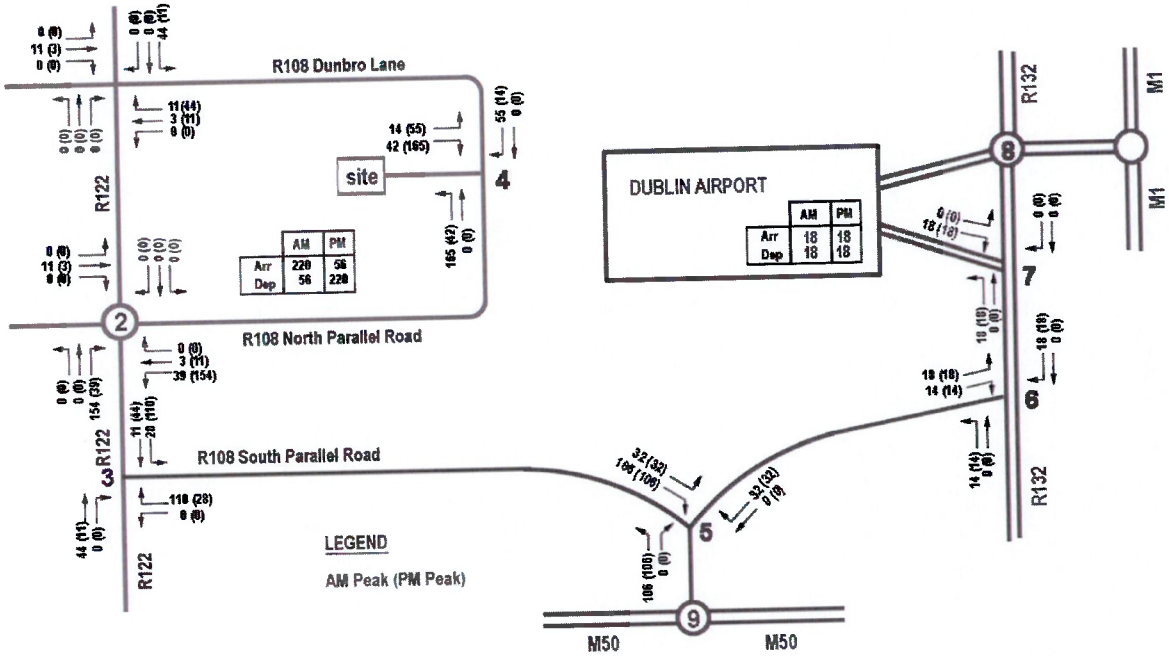

Figure 8 Development Traffic Trips

Traffic Increase Post Development at Junction 1 – 4

The traffic increases at Junctions 1, 2, 3 and 4 post development are set out in Table 1 below. The figures for Table 1 are reproduced from Section 11.1 of the TTA prepared by Waterman Moylan for the subject development in October 2025 and which accompanied the planning application to FFCC in November 2025.

The large increase at Junction 4 is due to the very low level of existing traffic at the location of the access to the proposed development.

Table 1 Increase in Traffic at Junctions 1 - 4 for Opening Year 2030

Location	Approach Flow vehicles per hour AM (PM)			
	Base 2030	Development	Total 2030	Increase
Junction 1	1,661 (1,713)	69 (69)	1,730 (1,782)	4.1% (4.0%)
Junction 2	1,944 (1,935)	207 (207)	2,151 (2,142)	10.6% (10.6%)
Junction 3	1,477 (1,302)	193 (193)	1,670 (1,495)	13.0% (14.8%)
Junction 4	80 (58)	276 (276)	356 (334)	445% (767%)

Legend: AM Peak Hour (PM Peak Hour)

Traffic Movements at Junctions 5 – 10

The results of the 2019 traffic survey for Junctions 5, 6, 7 and 8 presented in Table 2 were taken from Figures 4.13 – 4.16 in Appendix 6-2 TIA – Local Network to the Dublin Airport Infrastructure Application EIAR published by AECOM in December 2023.

The 2019 traffic survey results for Junction 9 were taken from Figure 4.8 of Appendix 6-3.

The base traffic at Junctions 5 – 9 for the Opening Year 2030 were obtained by factoring up the 2019 surveyed traffic using factor of 1.0134 from the TII Publication – *Project Appraisal Guidelines for National Roads Unit 5.3 – Travel Demand Projections* (May 2021).

The Central Growth Rate factor extracted from Table 6.1 of that publication is set out below.

- 2019 – 2030: 1.157

The updated traffic movements for Junctions 5 – 9 incorporating the general traffic increase between 2019 and 2030 are presented in Table 2.

Table 2 Base Traffic Movements Junctions 5 - 9

Location	Surveyed Traffic 2019	Increase 2019 - 2030	Base Traffic 2030
Junction 5	1,543 (1,838)	1.157	1,785 (2,127)
Junction 6	2,381 (2,598)	1.157	2,755 (3,006)
Junction 7	2,674 (2,749)	1.157	3,094 (3,181)
Junction 8	5,644 (5,545)	1.157	6,530 (6,416)
Junction 9	3,764 (4,568)	1.157	4,355 (5,285)

Legend: AM Peak Hour (PM Peak Hour)

Traffic Increase Post Development at Junction 5 - 9

The traffic increases at Junctions 5 - 9 post development are set out in Table 3 below.

The distribution of development traffic assumes that 50% of the eastbound traffic from Junction 3 (Figure 18 in the development TTA) is routed through Junctions 5, 6, 7 and 8 and 50% through Junction 9.

Table 3 Increase in Traffic at Junctions 5 - 9 in 2030

Location	Approach Flow vehicles per hour AM (PM)			
	Base 2030	Development	Total 2030	Increase
Junction 5	1,785 (2,127)	276 (276)	2,061 (2,403)	15.4% (13.0%)
Junction 6	2,755 (3,006)	64 (64)	2,819 (3,070)	2.3% (2.1%)
Junction 7	3,094 (3,181)	18 (18)	3,112 (3,199)	0.6% (0.6%)
Junction 8	6,530 (6,416)	0 (0)	6,530 (6,416)	0% (0%)
Junction 9	4,355 (1) (5,285) (1)	212 (212)	4,567 (1) (5,497) (1)	4.8% (4.0%)

Legend: AM Peak Hour (PM Peak) (1)Turning movements only – through flows not included

Junction 5 Traffic Modelling

Junction 5 was modelled as an existing signalised crossroads which provides access to the Dublin Bus garage at Harristown.

For both the DO-NOTHING and DO-SOMETHING scenarios, Junction 5 was modelled based on its existing layout.

Within the TRANSYT model, the four arms of Junction 5 were labelled as follows

- Arm 1: R108 (N)
- Arm 2: Old Airport Road (E)
- Arm 3: R108 (S)
- Arm 4: Harristown Road (W)

The results of the traffic modelling for Junction 5 are included in Appendix D.

Do-Nothing Scenario

The results for the DO-NOTHING scenario indicate that Junction 5 is currently operating within capacity and will continue to do so through 2030, 2035 and 2045, should the proposed development not take place.

The results for the DO-SOMETHING scenarios indicate that Junction 5 will operate within capacity for the Opening Year 2030 and will continue to do so post development through 2035 and 2045.

Future Junction Improvements

No future junction improvements are expected to be required at Junction 5.

However, should the future traffic at Junction 5 exceed the level predicted in this TTA either with or without the proposed development in place, the capacity of this junction can readily be increased by junction widening and improvements.

Summary

The Traffic and Transport Assessment Guidelines published by TII in May 2014 advises that a Transport Assessment is not required where traffic to and from a proposed development does not exceed 10% of the traffic on the adjoining road.

This threshold is reduced to 5% in locations which experience particularly heavy traffic congestion. The lower threshold of 5% has been used in the assessment of this development.

In the case of the subject site, traffic to and from the proposed development is predicted to exceed 5% of the traffic on the adjoining road at Junctions 1 – 4. A Transport Assessment incorporating these junctions was prepared and included with the planning application for the proposed development. Subsequently, Junction 5 has been reviewed and assessed as requested by Fingal County Council as the percentage increase at this junction was also found to exceed 5%.

However, as can be seen from Table 3, traffic to and from the proposed development is not predicted to exceed 5% of the traffic on the adjoining road.at Junctions 6 - 9 and accordingly, these junctions were not included in the Transport Assessment.

3.4.5 Request – Airside Location

The applicant is requested to be further develop the 'Traffic and Transport Assessment Report' to address the following items:

- *The applicant is requested to provide a detailed justification for locating a 'landside' 'aviation-related' cargo handling facility at a location that is approximately 9km from the existing cargo handling area of the airport; and in a location that is remote from public transport and active travel options for staff.*

3.4.6 Response

Cargo Handling

In the short term, the proposed development will function as a landside aviation related cargo handling unit with cargo shuttle to the existing airside cargo handling facilities at Dublin Airport.

In the long term, the proposed development will not be a landside aviation related cargo handling unit but an airside related cargo handling unit located adjacent to the proposed new Apron 7 being promoted by the DAA.

As can be seen from the Western Campus Masterplan described in Section 2 of this report, the proposed development is the first part of a multi-phase development to be located on the western side of Dublin Airport.

With the exception of the public transport hub for bus and Metrolink at Terminal 2, the landside elements of the western development will operate independently of the existing eastern section of the airport.

The proposed development is located adjacent to the new Apron 7 proposed by DAA. Cargo will be transferred between planes parked on Apron 7 and the proposed warehouses without using the public roads. Inbound cargoes will be sorted in the warehouse and despatched to the customers by road via the proposed Western Access Route.

In this way, there will be no requirement to interact with the existing cargo handling area of the airport or transfer goods by road through Junctions 5 – 9.

Public Transport

With few exceptions, facilities for travel at the location of a proposed development are seldom in place before the development but tend to come on stream as the development is completed.

Notwithstanding the fact that public transport services and facilities for active travel (walking and cycling) have not been provided or developed in the Huntstown area at the location of the proposed development, these deficiencies will be made good in the normal way as the elements of the western development come on stream.

3.4.7 Request – Description of Operation

The applicant is requested to be further develop the 'Traffic and Transport Assessment Report' to address the following items:

- *The Traffic and Transport Assessment report should provide a detailed description of the proposed operation that is envisaged and how exactly the operation would interact with the existing cargo handling operations of Dublin Airport. In regard to the 'trip rates' and 'trip assignment/distribution' for the proposed development, the percentage of trips to and from the airport should be clearly described, along with a clear description of the routes envisaged to be taken for trips between the airport and the proposed development.*

3.4.8 Response

Overview

The operation of the proposed development will provide for four streams of cargo. The four streams are:-

- Stream 1 Inbound by plane to Dublin Airport in the short term and Apron 7 in the long term.
- Stream 2 Outbound by truck/van from the proposed development via the Western Access Route.
- Stream 3 Inbound by truck/van to the proposed development via the Western Access Route.
- Stream 4 Outbound by plane from Dublin Airport in the short term and Apron 7 in the long term.

Stream 1

Cargo will arrive by plane to Dublin Airport. The planes will park on the existing apron in the short term sand on Apron 7 in the long term. Air freight containers will be transferred by forklift or transporter to the cargo shuttle service in the short term and to one of the four proposed warehouses in the long term.

Stream 2

Cargo from the inbound air freight containers will be sorted in one of the four warehouses and loaded into ISO containers for delivery by truck to the customer. Trucks will depart from the warehouses via the Western Access Route.

Stream 3

ISO Containers from customers will arrive to the proposed warehouses by truck via the Western Access Route. Cargo will be sorted and transferred to air freight containers.

Stream 4

In the short term, outbound cargo in air freight containers will be transferred by cargo shuttle to Dublin Airport and loaded onto cargo planes.

In the long term, outbound cargo will be transferred to planes parked on Apron by forklift or transporter.

Interaction and Routes

In the long term, the proposed development will be self-contained insofar as the transfer of cargo between the warehouses and planes is concerned.

In the short term, a cargo shuttle generating a very small level of traffic will operate between the proposed development and the existing cargo handling operations of Dublin Airport.

Summary

For a short period, cargo will be transferred by a temporary cargo shuttle between the proposed development and Dublin Airport. Services on the cargo shuttle will cease when Apron 7 becomes operational.

Following commissioning of Apron 7, cargoes would no longer be transferred between the proposed development and the existing cargo handling operations at Dublin Airport. As a consequence, there would not be any long-term routes for trips between the airport and the proposed development.

3.4.9 Request – Trip Assignment/Distribution

The applicant is requested to be further develop the 'Traffic and Transport Assessment Report' to address the following items:

- *The report should include a highly developed and detailed rationale for the trip assignment/distribution generated by the proposed development; and should include a detailed rationale for the trip assignment/distribution at each of the junctions mentioned above.*

3.4.10 Response

In the short term, the only traffic between the proposed development and Dublin Airport will be a very small volume of shuttle trips for cargo between the existing cargo facilities at Dublin Airport and the proposed development.

In the long term, cargo trips to be generated by the proposed development will be via the Western Access Route and no trips are envisaged between existing cargo facilities and the proposed development.

The trip distribution follows the established traffic patterns in the area and is cognisant of the routes to the national road network and major population centres.

3.4.11 Request -Scope of TTA

The applicant is requested to be further develop the 'Traffic and Transport Assessment Report' to address the following items:

- *The applicant is invited to consult with the Transportation Planning Section to discuss the scope of the 'Traffic and Transport Assessment' report; who can be contacted at the development does not exceed 10% of the traffic on the adjoining road*

3.4.12 Response

Description of Development

In the short term, the proposed development will be a landside aviation cargo facility with a shuttle transfer to and from Dublin Airport. Traffic movements generated by the shuttle service will be very small.

In the longer term, the proposed development will be an airside related cargo handling unit located adjacent to the proposed new Apron 7 being promoted by the DAA.

Short Term

Pending the completion of Apron 7, incoming cargo will be transferred between planes parked on the existing apron at Dublin Airport and the proposed warehouses via a temporary cargo shuttle service using the existing road network.

Inbound cargoes will be sorted in the warehouses and despatched to the customers by road via the proposed Western Access Route.

Outbound cargoes will be transferred by shuttle service from the proposed development to cargo planes parked on the existing aprons at Dublin Airport.

Long Term

Following completion of Apron 7, cargo will be transferred between planes parked on Apron 7 and the proposed warehouses without using the public road network. Inbound cargoes will be sorted in the warehouses and despatched to the customers by road via the proposed Western Access Route.

In the longer term, there will be no requirement to interact with the existing cargo handling area of the airport.

Traffic and Transport Assessment (TTA)

The TTA for this development was based on the premise that where the predicted increase in traffic at a junction exceeds 5% of the traffic on the adjoining road, traffic modelling and assessment of the junction should be carried out as part of the TTA.

Where traffic is predicted not to exceed 5%, no modelling or assessment is required under the Guidelines.

it would not be necessary to use the public road network in the long term for the transfer of inbound and outbound containers between cargo planes and the proposed warehouses.

Transport Guidelines

The Traffic and Transport Assessment Guidelines published by TII in May 2014 advises that a Transport Assessment is not required where traffic to and from the proposed development does not exceed 10% of the traffic on the adjoining road.

This threshold is reduced to 5% in locations which experience particularly heavy traffic congestion. The reduced threshold of 5% has been adopted for this development.

In the case of the subject site, traffic to and from the proposed development is predicted to exceed 5% of the traffic on the adjoining road at Junctions 1 – 4. A Transport Assessment incorporating these junctions was prepared and included with the planning application for the proposed development. Subsequently, Junction 5 has been reviewed and assessed as requested by Fingal County Council as the percentage increase at this junction was also found to exceed 5%.

However, as can be seen from Table 3, traffic to and from the proposed development is not predicted to exceed 5% of the traffic on the adjoining road.at Junctions 6 - 9 and accordingly, these junctions were not included in the Transport Assessment.

4. Foul Drainage – Engineering

4.1 Reason for Refusal No. 5

Foul drainage (OSWWTS): Recommend refusal

1. *Due to the absence of Uisce Eireann infrastructure in the proximity of the site the applicant proposes to construct a 250pe (population equivalent) private wastewater treatment system. It is considered that the generally used EPA Code of Practice for Domestic Wastewater Treatment Systems (PE≤10) (2021) is neither applicable, appropriate, nor adequate with regards to assessing the technical merits of the proposal.*
2. *Given the scale of the proposed development and the future development potential associate with the zoned lands, the pollution risk is considered to be large and unjustifiable.*
3. *It is recommended that the proposal be refused for these reasons, and that the applicant engages with Uisce Eireann in order to achieve a connection into the UE network. Whilst a gravity network is most favoured, a suitable pumping station arrangement may also be considered.*

4.2 Response

Mitchell Environmental have designed an interim wastewater treatment plant to cater for the Phase 1 cargo handling facility. This treatment plant is designed in accordance with the latest EPA guidelines and follows established principles for the treatment of wastewater removed from the Uisce Eireann network. Please refer to Mitchell Environmental detailed response to this reason for refusal.

The medium term proposal is that, as part of the larger development including the terminal, offices, hotel and N2 link road that the wastewater treatment plant be replaced with a pumping station and wastewater is pumped to the Uisce Eireann network at an agreed location. The options exist to pump to Cherryhound to the northwest along the route of the proposed N2 link road ('1' on Figure 9 over), to Coldwinters on the old N2 to the southwest along the public road network ('2' on Figure 9 over) or potentially to the east via the existing private foul sewer network serving Dublin Airport currently ('3' on Figure 9 over). Given the relatively low flows associated with the initial phase, and the suitability of the site to facilitate the provision of a wastewater treatment plant it is therefore considered the most appropriate solution for this Phase of development.

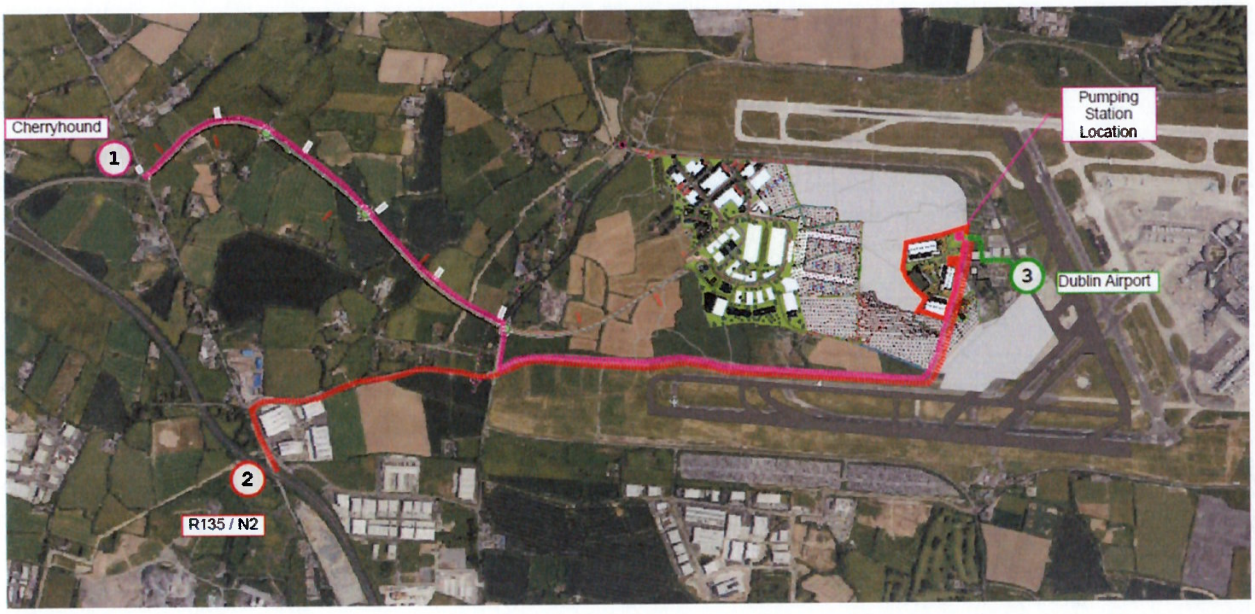

Figure 9 Permanent Foul Water Optioins Plan

APPENDICES

A. Drawings

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- ☐ CONSTRUCTION

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RIAI
IRISH PLANNING INSTITUTE

CLIENT: D.A. TERMINAL 3 LTD.

PROJECT: PROPOSED AVIATION RELATED CARGO HANDLING UNITS @ LANDS WITHIN THE TOWNLANDS OF HUNTSTOWN, CO. DUBLIN

TITLE: PROPOSED WESTERN CAMPUS MASTERPLAN

SCALE	DRAWN	DATE	DRGNO
NTS	JD	AUG.2025	

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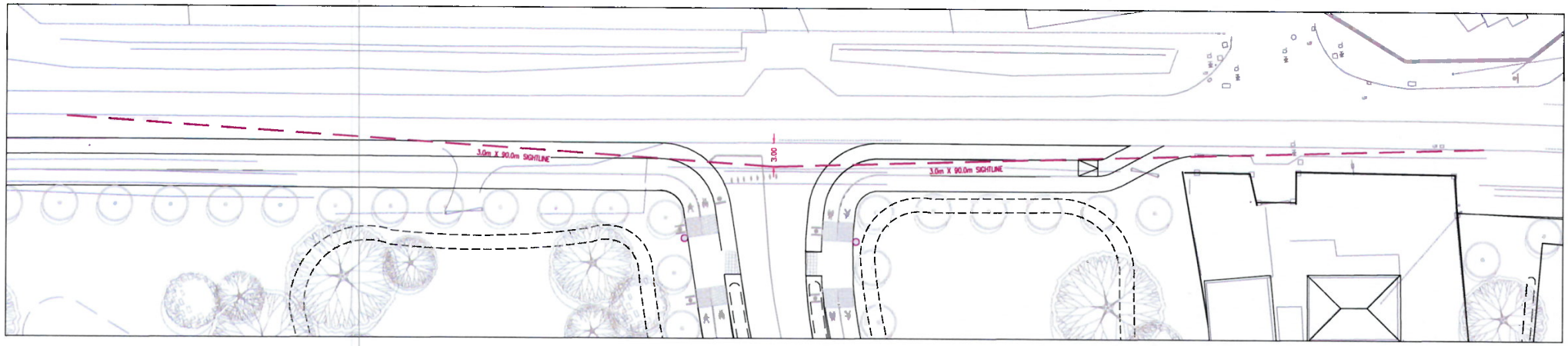
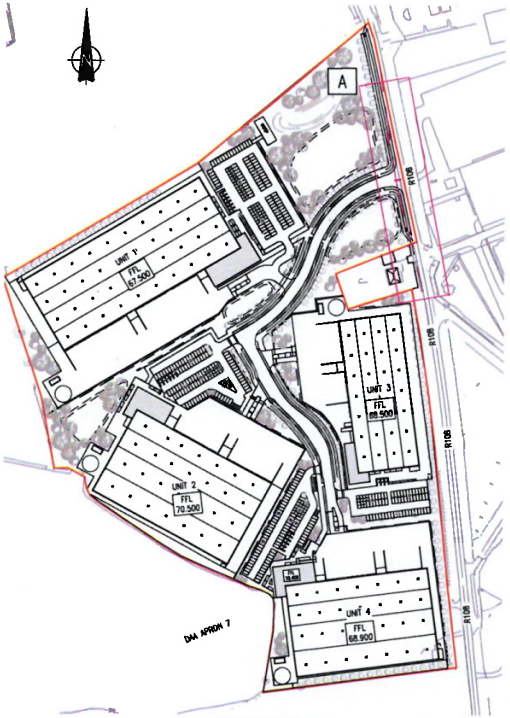


PROPOSED 3.0m x 90.0m SIGHTLINE – PLAN VIEW A
SCALE 1:250



PROPOSED SIGHTLINE PLAN
SCALE 1:5000

LEGEND
3.0m X 90.0m SIGHTLINE

Rev	Date	Description	By	Chk
-	21/01/2026	ISSUED FOR PLAN	MS	IW

Amendments

Project
PROPOSED CARGO HANDLING UNITS
AT HUNTSTOWN,
CO. DUBLIN

Title
PROPOSED 3.0m X 90.0m
VISIBILITY SPLAY

Client
D.A. TERMINAL 3 Ltd

waterman moylan

BLOCK S, EASTPOINT BUSINESS PARK, ALFIE BYRNE ROAD,
DUBLIN D03 H3F4 IRELAND. Tel: (01) 664 6900
Email: info@waterman-moylan.ie www.waterman-moylan.ie

Status
PLANNING

Designed By	Approved	Waterman Ref	
NM	IW	22-091	
Drawn By	Date	Scales @ A1	
MS	NOV. 2025	AS SHOWN	

Project - Originator - Volume - Level - Type - Role - Number | Revision
HT3 - WAT - ZZ - XX- DR - P -01402 | -

1:5000 0 100m 200m 300m 400m 500m
1:1 0 10 20 30 40 50 60 70 80 90 100
1:250 0 5m 10m 15m 20m 25m
1:1 0 10 20 30 40 50 60 70 80 90 100

Drawing Location: K:\Projects\ZZZ-091 Huntstown\Drawings\Waterman Moylan\Civil\Planning\Planning Drawings (Current)\HT3-WAT-ZZ-XX-DR-P-01402 - Proposed 3.0m x 90.0m Visibility Splay.dwg
Date: Jan 20, 2026 - 3:25pm

B. Road Safety Audit

BRUTON CONSULTING ENGINEERS

Title: **STAGE 1 ROAD SAFETY AUDIT**

For;

Proposed Aviation Related Cargo Handling Units @ Lands within the townland of Huntstown, Co. Dublin.

Client: **Waterman Moylan Consulting Engineers on behalf of D.A. Terminal 3 Ltd**

Date: **November 2025**

Report reference: **2889R01**

VERSION: **FINAL (5-2-2026)**

Prepared By:

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1.0 Introduction

This report was prepared in response to a request from Noel Mahon, Waterman Moylan Consulting Engineers Ltd. for a Stage 1 Road Safety Audit for the proposed aviation related cargo handling units at the townland of Huntstown in Co. Dublin.

The Road Safety Audit Team comprised of;

Team Leader: **Norman Bruton**, BE CEng FIEI, Cert Comp RSA.

TII Auditor Approval no: NB 168446

Team Member: **Owen O'Reilly,** B.SC. Eng Dip Struct. Eng NCEA Civil Dip Civil. Eng CEng MIEI

TII Auditor Approval no: OO 1291756

The Road Safety Audit comprised an examination of the drawings provided and a site visit by the Audit Team, on the7th of November 2025.

The weather at the time of the daytime site visit was wet and the road surface was also wet.

This Stage 1 Road Safety Audit has been carried out in accordance with the requirements of TII Publication Number GE-STY-01024, dated May 2025.

The scheme has been examined and this report compiled in respect of the consideration of those matters that have an adverse effect on road safety. It has not been examined or verified for compliance with any other standards or criteria.

The problems identified in this report are considered to require action in order to improve the safety of the scheme for road users.

If any of the recommendations within this safety audit report are not accepted, a written response is required, stating reasons for non-acceptance. Comments made within the report under the heading of Observation are intended to be for information only. Written responses to Observations are not required.

A location map showing where each problem occurs is provided in **Appendix A.**

A list of the documents provided to the Audit Team is provided in **Appendix B.**

The feedback form is provided in **Appendix C.**

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2.0 Background

It is proposed to construct 4 no. cargo handling units within a new development off the R108 in the townland of Huntstown.

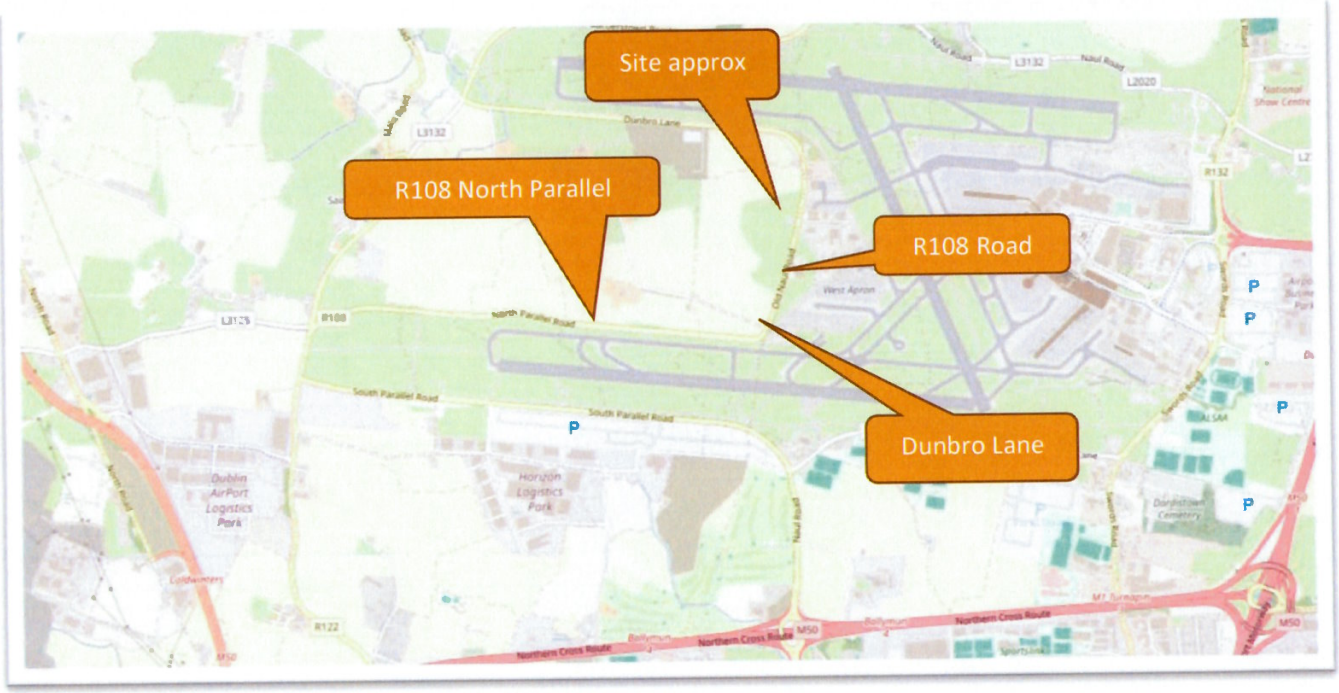
Access to the development would be off the R108 by means of a simple priority junction.

Pedestrian and cyclist paths would be provided within the internal roads and along the R108 from the site boundary to the north to the existing domestic dwelling (unoccupied) to the south.

The speed limit on the R108 is 60km/hr.

Each unit will have carparking and bicycle shelters.

The site location is shown below.



3.0 Issued Raised in This Road Safety Audit.

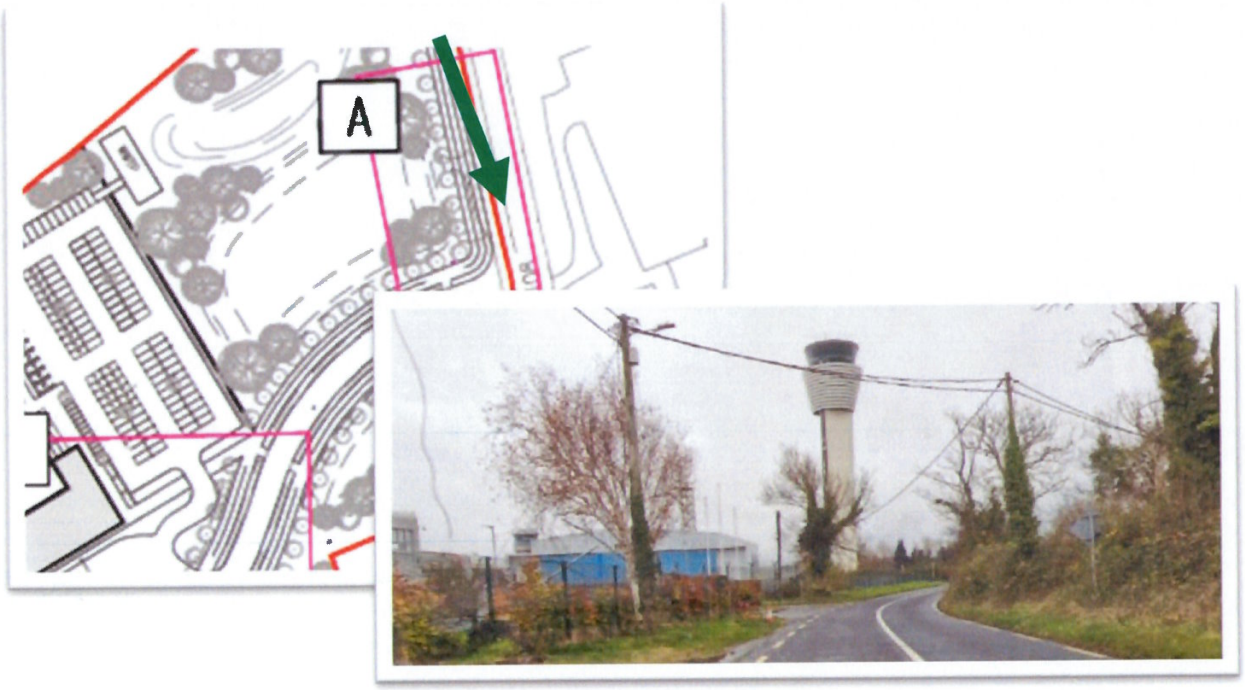
3.1 Problem

Location.

Drawing HT3-WAT-ZZ-XX-DR-P-01400 Rev - , R108.

Problem.

The proposed access to the development is to the south of a horizontal bend on the R108. There is a risk that a southbound vehicle may collide with a stationery heavy goods vehicle waiting to turn right into the development due to a lack of stopping sight distance. There may also be a need to stop for right left turning vehicles exiting the development as they need to cross the centre line to undertake the turning movement.



Recommendation

It is recommended that the stopping sight distance to the rear of the longest queue of heavy goods vehicles expected to be waiting to turn right be assessed and, if required, that a right turning lane be provided. The stopping sight distance should be based on the operating speed of the R108.

3.2 Problem

Location.

Drawing HT3-WAT-ZZ-XX-DR-P-01400 Rev - , R108.

Problem.

The proposed access to the development is at the end of a full overtaking section of the R108. Northbound drivers may attempt overtake slower moving heavy goods vehicles may may collide with other vehicles exiting the development.

Recommendation

It is recommended that overtaking be prohibited for a distance before the new access junction by the provision of a solid centre line and no overtaking signage.

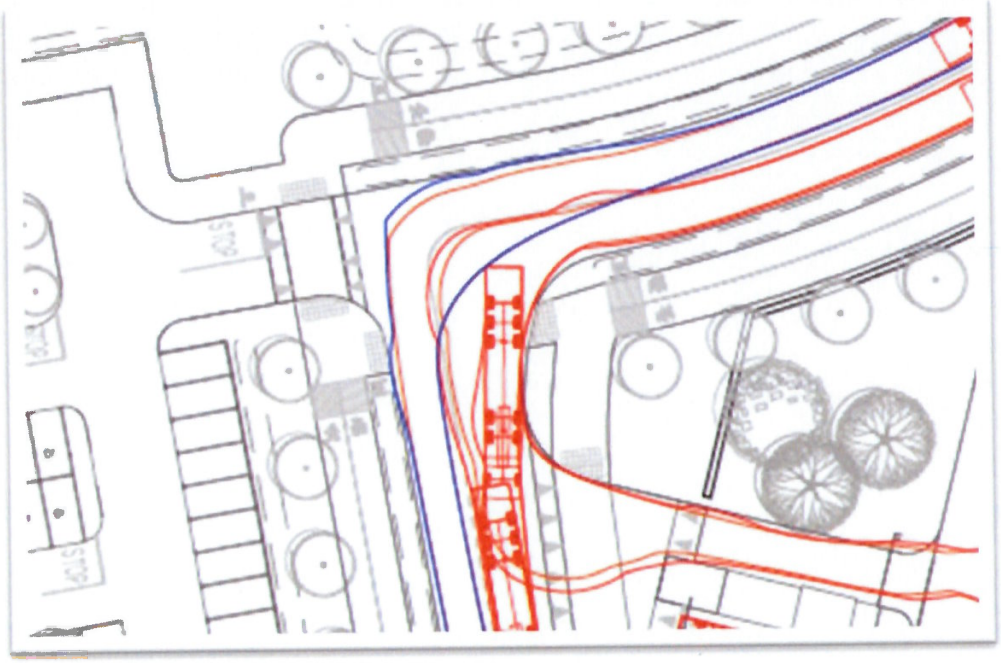
3.3 Problem

Location.

Drawing HT3-WAT-ZZ-XX-DR-P-01500 Rev - , Swept path of HGVs.

Problem.

The swept path analysis shows that two heavy goods vehicles (HGVs) cannot pass on the spinal road at the tight horizontal radius bend adjacent to the car park access to Unit 2. Given the high number of vehicle movements anticipated at this location there is a risk that drivers will overrun the tactile paving and shared use pedestrian/cyclists area at the inside of the bend. This could lead to damage to the paving and hazards for those vulnerable road users.



Recommendation

It is recommended that widening be provided so that vehicles can pass or that a shuttle system be provided where drivers know where to yield to oncoming vehicles.

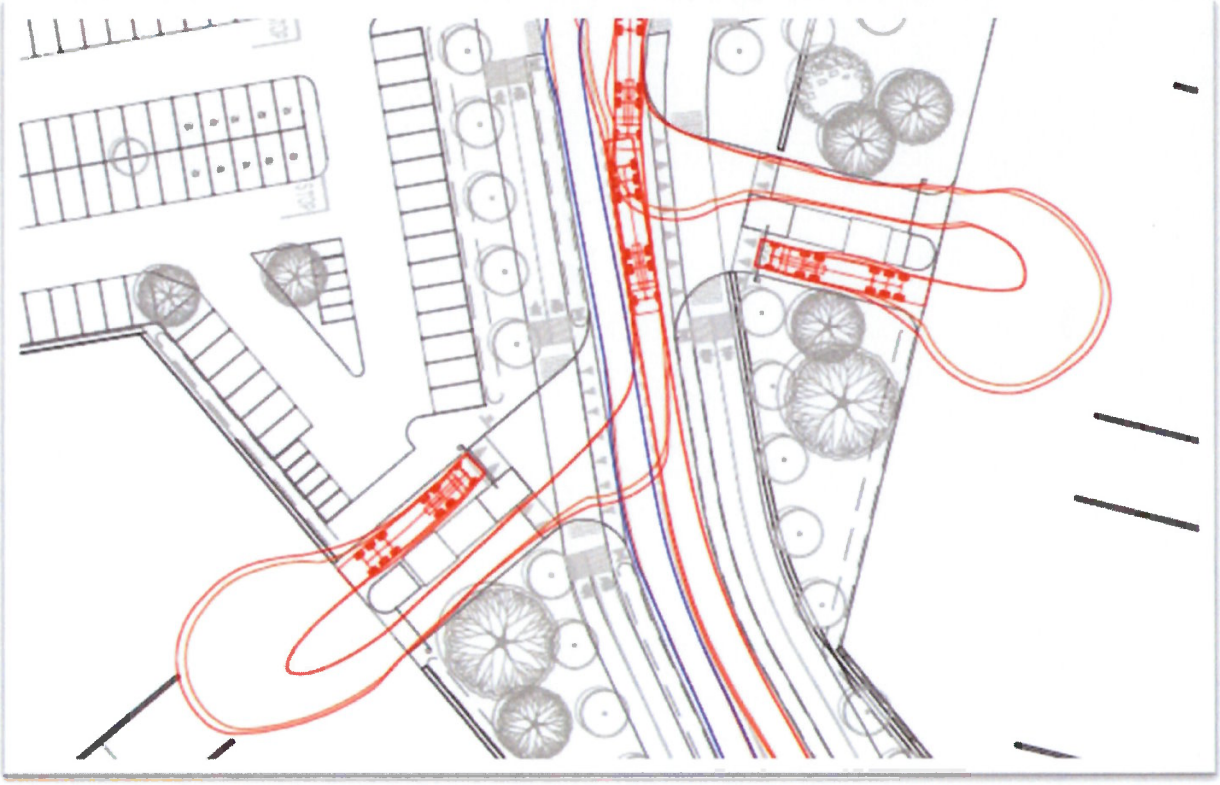
3.4 Problem

Location.

Drawing HT3-WAT-ZZ-XX-DR-P-01500 Rev - , Swept path of HGVs.

Problem.

The swept path for HGVs entering Unit 2 has been shown on the drawings but not that for HGVs exiting. Given the tight corner radius this movement may lead to overrunning of the pedestrian/cyclist path resulting in hazards for those road users.



Recommendation

It is recommended that the swept path for exiting HGVs be carried out for Unit 2 and the other units to ensure the movement can be carried out comfortably.

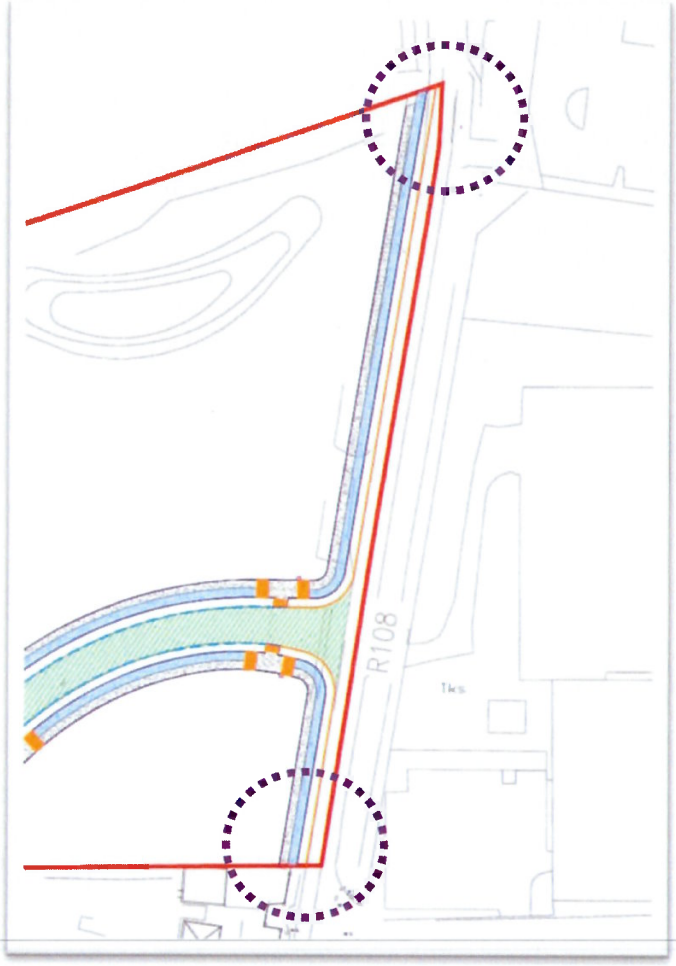
3.5 Problem

Location.

Drawing HT3-WAT-ZZ-XX-DR-P-01100 Rev - , Footpaths and cycle tracks on R108.

Problem.

It is proposed to provide a footpath and a cycle track on part of the R108. There is no transition arrangement however to get pedestrians and cyclists from on-road to off-road at the tie-in points. This could lead to cyclists remaining on the carriageway or to pedestrians tripping on the high kerbs.



Recommendation

It is recommended that transitional arrangements be provided.

3.6 Problem

Location.

Drawing HT3-WAT-ZZ-XX-DR-P-01100 Rev - , R108.

Problem.

It is assumed that this development may be a 24 hour operation. It is not clear if it is proposed to provide lighting at the junction with the R108. Without lighting drivers may not anticipate a busy access junction with HGVs that need the whole carriageway to turn and the possibility of pedestrians and cyclists crossing.

Recommendation

It is recommended that the junction be lit.

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4.0 Audit Statement

We certify that we have examined the material provided and the site. The examination has been carried out with the sole purpose of identifying any aspects of the design which could be added, removed or modified in order to improve the safety of the scheme.

The problems identified have been noted in this report together with associated safety improvement suggestions which we would recommend should be studied for implementation. The audit has been carried out by the persons named below who have not been involved in any design work on this scheme as a member of the Design Team.

Norman Bruton **Signed:** Norman Bruton

(Audit Team Leader) **Dated:** 5-2-2026

Owen O'Reilly **Signed:** Owen O'Reilly

(Audit Team Member) **Dated:** 5-2-2026

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Appendix A – Problem Location Plan

Appendix B – Information Provided

Information Supplied to the Audit Team

- Drawing HT3-WAT-ZZ-XX-DR-P-02001 - Proposed Drainage Layout - Sheet 1 of 3
- Drawing HT3-WAT-ZZ-XX-DR-P-02002 - Proposed Drainage Layout - Sheet 2 of 3
- Drawing HT3-WAT-ZZ-XX-DR-P-02003 - Proposed Drainage Layout - Sheet 3 of 3
- Drawing HT3-WAT-ZZ-XX-DR-P-02400 - Proposed SuDS Layout and Details
- Drawing 1939 - REV G - DWG 01 - Landscape Masterplan - Warehouse - RMDA 1
- Drawing 25040-PL-02.1-Proposed Site Plan
- Drawing HT3-WAT-ZZ-XX-DR-P-00010 - Proposed Site Location Map
- Drawing HT3-WAT-ZZ-XX-DR-P-01000 - Proposed General Arrangement
- Drawing HT3-WAT-ZZ-XX-DR-P-01001 - Proposed General Arrangement - Sheet 1 of 3
- Drawing HT3-WAT-ZZ-XX-DR-P-01002 - Proposed General Arrangement - Sheet 2 of 3
- Drawing HT3-WAT-ZZ-XX-DR-P-01003 - Proposed General Arrangement - Sheet 3 of 3
- Drawing HT3-WAT-ZZ-XX-DR-P-01100 - Proposed Kerbing & Surfacing Layout
- Drawing HT3-WAT-ZZ-XX-DR-P-01400 - Proposed Visibility Splays - Sheet 1 of 2
- Drawing HT3-WAT-ZZ-XX-DR-P-01401 - Proposed Visibility Splays - Sheet 2 of 2
- Drawing HT3-WAT-ZZ-XX-DR-P-01500 - Proposed Autotrack Analysis
- Drawing HT3-WAT-ZZ-XX-DR-P-01600 - Proposed Road Markings & Signage - Sheet 1 of 2
- Drawing HT3-WAT-ZZ-XX-DR-P-01601 - Proposed Road Markings & Signage - Sheet 2 of 2
- Drawing HT3-WAT-ZZ-XX-DR-P-02000 - Proposed Drainage General Arrangement

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Appendix C – Feedback Form

Feedback Form

SAFETY AUDIT FORM – FEEDBACK ON AUDIT REPORT

Scheme: Cargo Handling Units, Dublin Airport.
Stage: 1 Road Safety Audit
Date Audit (Site Visit) Completed: 7-11-2025

Paragraph No. in Safety Audit Report	Problem accepted (yes/no)	Recommended measure accepted (yes/no)	Alternative measures (describe)	Alternative measures accepted by Auditors (Yes/No)
3.1	Yes	Yes		
3.2	Yes	Yes		
3.3	Yes	Yes		
3.4	Yes	Yes		
3.5	Yes	Yes		
3.6	Yes	Yes		

Signed...Noel Mahon..... **Date**.....26/01/2026.....
Design Team Leader

Signed.....Norman Brunton..... **Date**.....5-2-2026.....
Audit Team Leader

Signed..... **Date**.....5/2/26.....
Developer/Employer

Mr. Francis Whelan MRIAI
CWPA Managing Director
On behalf of DA Terminal 3 Ltd.

C. Reports by Fingal County Council

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE

PLANNING REPORT

Report of the Water Services Department

Register Reference: FW25A/0480E

Registration Date: 07-Nov-2025

Development: Planning Permission for the following developments:

1. Construction of four aviation-related cargo handling units with ancillary office space:

i. Unit 1: c.10,869.7 m² (including 940.9 m² office space)
ii. Unit 2: c.9,151.3 m² (including 751.3 m² office space)
iii. Unit 3: c.6,024.9 m² (including 497.7 m² office space)
iv. Unit 4: c.8,577.7 m² (including 751.3 m² office space)

The proposed units will have an overall combined total gross floor area (GFA) of c. 34,623.6 sq.m (alongside ancillary ESB substations, 4 no. security huts with a combined GFA of 30 sqm and pumphouses). The warehouses are c. 12m in height, with the office element being c. 3.3 m in height and located within a landscaped campus on a site of c. 10.7 Ha.

2. Provision of 390 car parking spaces, including 39 EV charging points, 19 accessible spaces, and 39 motorcycle bays.

3. Provision of 230 secure bicycle parking spaces, of which 100 are short stay spaces and 130 are sheltered long stay spaces.

4. Provision of approx. 77 truck parking spaces and 5 van spaces.

5. Hard and soft landscaping, new boundary treatments, including a c. 2m high System Wire Fence to site boundary.

6. Construction of new site entrance onto the R108.

7. Wastewater treatment plant and infiltration area for 250 PE.

8. All necessary site development and engineering and ancillary site works, including provision of ESB substations and switchrooms, sprinkler tanks and pumphouses, bin store and recycle store, lighting, signage, underground services, photovoltaic panel zones at roof level and sustainable drainage systems (SuDS).

An Environmental Impact Assessment Report (EIAR) will be submitted to the Planning Authority with the planning application.

Location: Lands within the townland of Huntstown, Swords, Co. Dublin, The subject site fronts onto the R108 to the east.

Applicant: D.A. Terminal 3 Limited

Application Type: Permission

Report

Flood risk: No objection

Foul drainage (OSWWTS): Recommend refusal

1. Due to the absence of Uisce Eireann infrastructure in the proximity of the site the applicant proposes to construct a 250pe (population equivalent) private wastewater treatment system. It is considered that the generally used EPA Code of Practice for Domestic Wastewater Treatment Systems (PE≤10) (2021) is neither applicable, appropriate, nor adequate with regards to assessing the technical merits of the proposal.
2. Given the scale of the proposed development and the future development potential associate with the zoned lands, the pollution risk is considered to be large and unjustifiable.
3. It is recommended that the proposal be refused for these reasons, and that the applicant engages with Uisce Eireann in order to achieve a connection into the UE network. Whilst a gravity network is most favoured, a suitable pumping station arrangement may also be considered.

Surface water drainage: No objection subject to:

1. No surface water / rainwater is to discharge into the foul water system under any circumstances.
2. The surface water drainage must be in compliance with the Greater Dublin Regional Code of Practice for Drainage Works, Version 6.0, FCC, April 2006.

Engineer:	***PG***	Endorsed:	**DD**
Date:	***2.12.25***	Date:	**15/12/2025**

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE

PLANNING REPORT

Report of the Transportation Planning Section

Register Reference: FW25A/0480E

Registration Date: 07-Nov-2025

Development: Planning Permission for the following developments:

1. Construction of four aviation-related cargo handling units with ancillary office space:

i. Unit 1: c.10,869.7 m² (including 940.9 m² office space)

ii. Unit 2: c.9,151.3 m² (including 751.3 m² office space)

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The proposed units will have an overall combined total gross floor area (GFA) of c. 34,623.6 sq.m (alongside ancillary ESB substations, 4 no. security huts with a combined GFA of 30 sqm and pumphouses). The warehouses are c. 12m in height, with the office element being c. 3.3 m in height and located within a landscaped campus on a site of c. 10.7 Ha.

2. Provision of 390 car parking spaces, including 39 EV charging points, 19 accessible spaces, and 39 motorcycle bays.

3. Provision of 230 secure bicycle parking spaces, of which 100 are short stay spaces and 130 are sheltered long stay spaces.

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5. Hard and soft landscaping, new boundary treatments, including a c. 2m high System Wire Fence to site boundary.

6. Construction of new site entrance onto the R108.

7. Wastewater treatment plant and infiltration area for 250 PE.

8. All necessary site development and engineering and ancillary site works, including provision of ESB substations and switchrooms, sprinkler tanks and pumphouses, bin store and recycle store, lighting, signage, underground services, photovoltaic panel zones at roof level and sustainable drainage systems (SuDS).

An Environmental Impact Assessment Report (EIAR) will be submitted to the Planning Authority with the planning application.

Location: Lands within the townland of Huntstown, Swords, Co. Dublin, The subject site fronts onto the R108 to the east.

Applicant: D.A. Terminal 3 Limited

Application Type: Permission

Report

General

The proposed development is located on the regional road R108 which has a speed limit of 60km/hr.

The site has a land zoning objective of 'DA - Dublin Airport'.

Dublin Airport is of vital importance to the Irish economy and acts as the principal international gateway for trade, inward investment and tourism. The aviation sector is one of the most important components of both Fingal's local economy and the wider National economy. Dublin Airport is nationally significant due to its employment base, passenger throughput and air freight services and it remains the primary economic hub in Fingal.

In order to achieve the anticipated growth of the Airport, including increased passenger numbers and increased employment, sustainable development is vital to maintain, protect and improve surface access to the Airport. The anticipated growth in the capacity of Dublin Airport will be, to a large extent, dependent on the ability of passengers and staff to efficiently and conveniently access the Dublin Airport campus. It is important that accessibility to and from the Airport is therefore protected and enhanced. One of the most immediate capacity constraints affecting the Airport is that of the congestion of the surface access to the Airport.

The Dublin Airport Local Area Plan 2020 recognises these constraints stating;

At present, the existing national road network in general, and the network serving Dublin Airport and its environs on the eastern side of the Airport campus, such as the M1, M50, M1/M50 and Airport Roundabout, are operating at or close to capacity for large parts of the day. Additionally, road access to Dublin Airport is heavily dependent on the M50/M1/Airport Roundabout route. With such heavy reliance on one particular routing, there is a lack of redundancy and resilience in the road access network. In practice, this means that small, localised incidents can have a disproportionately negative impact on travel to and from Dublin Airport over a large area.

The LAP sets out several objectives to be addressed in any proposed development to ensure sustainable Growth at the Airport, ensuring surface access resilience to the Airport whilst minimising impact on the external strategic road Network. Objectives are included in the LAP such as a coordinated approach amongst the relevant Transport Authorities to the creation of a Transport Model , improved mobility management measures at the Airport, External Road Network interventions, Carparking management, improved Public transport to the Airport.
This application does not address many of the objectives contained in the LAP. The development would be located remote from any public transport provision, and therefore very much a car dependent development and contrary to many of the DA LAP Objectives on surface access.
The proposed development presents a piecemeal approach to development at the Airport, and does not present a comprehensive and cohesive approach in ensuring sustainable growth at the Airport is safeguarded.

Access/Sightlines

The posted speed for the road at this location is 60km/hr, requiring sightlines of 90m visibility to the nearside edge of the road both sides of the entrance, viewed from a 2.4m setback from the edge of the road; as per the requirements of DN-GEO-03060 as published by Transport Infrastructure Ireland (TII). This visibility requirement is from a driver eye-height of 1.05m to an object height of 0.6m.

The applicant has provided a sightline drawing demonstrating sightlines for a 60km per hour speed limit using the standards of the Design Manual for Urban Roads and Streets, which is not acceptable for this location; and should be as per the requirements of DN-GEO-03060 as published by Transport Infrastructure Ireland (TII).

Car Parking

The Fingal Development Plan 2023-2029; the car parking standards creates two distinct parking zones to ensure adequate residential parking provision and the control of destination car parking. This approach also allows greater flexibility in the application of car parking standards on sites in areas with varying levels of road and public transport provision.
The proposed development is just outside of a 1600m distance from a planned metro stop, and is in 'Zone 2'.

Unit Type	No. of units	Dev Plan 2023-2029 Standards for 'Zone 2'	Applicants Proposed Rate
Unit 1 Office	940sqm	1 per 40sqm - 24	24
Unit 1 Warehouse	9850	1 per 100sqm – 99	99
Unit 2 Office	751	1 per 40sqm - 19	19
Unit 2 Warehouse	8324sqm	1 per 100sqm - 83	84
Unit 3 Office	497	1 per 40sqm - 12	12
Unit 3 Warehouse	5451 sqm	1 per 100sqm - 55	55
Unit 4 Office	751	1 per 40sqm - 19	19
Unit 4 Warehouse	7550 sqm	1 per 100sqm – 76	78
		387 spaces total	390 spaces total

The applicant is proposing 390 car parking spaces, including 19 accessible spaces and 39 spaces for EV charging.

The DA LAP sets out a number of objectives regarding car parking.

OBJECTIVE CP04 *Limit the growth of employee parking in order to improve public transport usage, particularly in locations near the centre of Dublin Airport campus where land can be more efficiently used for other purposes.*

OBJECTIVE CP07 Limit the provision of new car parking to serve non-core uses within the DA zoned lands, and to control the supply of car parking at Dublin Airport so as to a) maximise the use of public transport b) reduce traffic congestion and c) to secure the efficient use of land.

The proposed provision of 390 carparking spaces at this location would be contrary objectives set out in the LAP.

Bicycle Parking

The proposed development has a bicycle parking requirement of 207 'long stay' spaces for staff and 173 'short stay' spaces for visitors; as per the standards of the Fingal County Development Plan.

The applicant is proposing to provide 130 'long stay' spaces and 100 'short stay' spaces; with space included for the future provision of 60 short stay spaces for visitors and 80 long stay spaces for staff.

The Transportation Planning Section has no objection to the bicycle parking quantity proposed; and no objection to the general layout and detail proposed.

Motorcycle Parking
The proposed development includes 39 motorcycle parking spaces, which generally aligns with the

Layout
The Transportation Planning Section has no objective to the proposed layout.
The applicant has provided a detailed 'Engineering Assessment Report', which includes a 'swept path analysis of the junctions and internal road network'.

The applicant has not included a 'road safety audit', and we recommend that they are requested to provide one as part of an additional information submission.

Traffic and Transportation
The applicant has provided a Traffic and Transport Assessment report.

The Transportation Planning Section recommend that the report should be further developed to address the following items:

- DA LAP Objective SF02
  Implement the recommendations of the South Fingal Transport Study in relation to Dublin Airport in order to ensure that a balanced response to the expansion of Dublin Airport occurs. It shall be a requirement that any planning applications to increase passenger numbers or that result in an increased demand for travel, shall clearly demonstrate the required transport infrastructure and measures to accommodate the proposed increase in line with the recommendations of the South Fingal Transport Study.
- The Traffic and Transport Assessment report should include an assessment (and traffic surveys/counts) of all of the junctions located between the proposed development and the airport; and the nearby junctions with the N2 and the M50, including the following junctions:
  - Junction of the R108 with Collinstown Lane (Old Airport Road).
  - Junction of the R132 with Collinstown Lane (Old Airport Road).
  - Junction of the R132 with the Corballis Road South (i.e. adjacent to ALSAA grounds).
  - Airport Roundabout.
  - Junction of the R108 with the M50.
  - Junction of the R135 with the L-3125 (Kilshane Cross).

- The Traffic and Transport Assessment report should provide a detailed description of the proposed operation that is envisaged and how exactly the operation would interact with the existing cargo handling operations of Dublin Airport. In regard to the 'trip rates' and 'trip assignment/distribution' for the proposed development, the percentage of trips to and from the airport should be clearly described, along with a clear description of the routes envisaged to be taken for trips between the airport and the proposed development.

- The report should include a highly developed and detailed rationale for the trip assignment/distribution generated by the proposed development; and should include a detailed rationale for the trip assignment/distribution at each of the junctions mentioned above.
- The applicant is requested to provide a detailed justification for locating a 'landside' 'aviation-related' cargo handling facility at a location that is approximately 9km from the existing cargo handling area of the airport; and in a location that is remote from public transport and active travel options for staff.

Conclusion

In order to achieve the anticipated growth of the Airport, including increased passenger numbers and increased employment, sustainable development is vital to maintain, protect and improve surface access to the Airport.

The Dublin Airport LAP sets out several objectives to be addressed in any proposed development to ensure sustainable Growth at the Airport, ensuring surface access resilience to the Airport whilst minimising impact on the external strategic road Network. Objectives are included in the LAP such as a coordinated approach amongst the relevant Transport Authorities to the creation of an Transport Model, improved mobility management measures at the Airport, External Road Network interventions, Carparking management, improved Public transport to the Airport.

This application does not address many of the objectives contained in the LAP. The development would be located remote from any public transport provision, and therefore very much a car dependent development and contrary to many of the DA LAP Objectives on surface access.

The proposed development presents a piecemeal approach to development at the Airport, and does not present a comprehensive and cohesive approach in ensuring sustainable growth at the Airport is safeguarded.

The Transportation Planning Section does not support the proposed development and would recommend a refusal.

In the event that a request for additional information is sought the Transport planning section requires the following additional information in order to fully assess the proposed development:

1. The applicant is requested to provide a revised sightline drawing demonstrating sightlines for a 60km/hr speed limit, as per the requirements of DN-GEO-03060 as published by Transport Infrastructure Ireland (TII); which is a minimum sightline of 90m visibility to the nearside edge of the road both sides of the entrance, viewed from a 2.4m setback from the edge of the road.
2. The applicant is requested to provide a 'Stage 1 Road Safety Audit', to the requirements outlined in the Transportation Infrastructure Ireland guidelines on road safety audits.
3. The applicant is requested to be further develop the 'Traffic and Transport Assessment Report' to address the following items:

- DA LAP Objective SF02
  Implement the recommendations of the South Fingal Transport Study in relation to Dublin Airport in order to ensure that a balanced response to the expansion of Dublin Airport occurs. It shall be a requirement that any planning applications to increase passenger numbers or that result in an increased demand for travel, shall clearly demonstrate the required transport infrastructure and measures to accommodate the proposed increase in line with the recommendations of the South Fingal Transport Study.
- Traffic and Transport Assessment report should include an assessment (and associated traffic surveys/counts) of all of the junctions located between the proposed development and the existing airport cargo facility; and the nearby junctions with the N2 and the M50, including the following junctions:
  - Junction of the R108 with Collinstown Lane (Old Airport Road)
  - Junction of the R132 with Collinstown Lane (Old Airport Road)
  - Junction of the R132 with the Corballis Road South (i.e. adjacent to ALSAA)
  - Airport Roundabout
  - Junction of the R108 with the M50
  - Junction of the R135 with the L-3125 (Kilshane Cross).

- The applicant is requested to provide a detailed justification for locating a 'landside' 'aviation-related' cargo handling facility at a location that is approximately 9km from the existing cargo handling area of the airport; and in a location that is remote from public transport and active travel options for staff.
- The Traffic and Transport Assessment report should provide a detailed description of the proposed operation that is envisaged and how exactly the operation would interact with the existing cargo handling operations of Dublin Airport. In regard to the 'trip rates' and 'trip assignment/distribution' for the proposed development, the percentage of trips to and from the airport should be clearly described, along with a clear description of the routes envisaged to be taken for trips between the airport and the proposed development.
- The report should include a highly developed and detailed rationale for the trip assignment/distribution generated by the proposed development; and should include a detailed rationale for the trip assignment/distribution at each of the junctions mentioned above.

- The applicant is invited to consult with the Transportation Planning Section to discuss the scope of the 'Traffic and Transport Assessment' report; who can be contacted at planning@fingal.ie

Signed: Endorsed: _____

Date: Date: _____

D. Junction 5 Traffic Modelling

TRANSYT 16

Version: 16.0.1.8473
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Filename: Junction 5.t16
Path: M:\Projects\22\22-091 Huntstown\Design\Civil\Traffic\Junction5 modelling
Report generation date: 29/01/2026 10:00:27

»A1 - AM : D1 - 2019 BASE YEAR, AM :
»A1 - AM : D3 - 2030 DO NOTHING, AM :
»A1 - AM : D5 - 2035 DO NOTHING, AM :
»A1 - AM : D7 - 2045 D0 NOTHING, AM :
»A1 - AM : D9 - 2030 DO SOMETHING, AM :
»A1 - AM : D11 - 2035 DO SOMETHING, AM :
»A1 - AM : D13 - 2045 DO SOMETHING, AM :
»A2 - PM : D2 - 2019 BASE YEAR, PM :
»A2 - PM : D4 - 2030 DO NOTHING, PM :
»A2 - PM : D6 - 2035 DO NOTHING, PM :
»A2 - PM : D8 - 2045 DO NOTHING, PM :
»A2 - PM : D10 - 2030 DO SOMETHING, PM :
»A2 - PM : D12 - 2035 DO SOMETHING, PM :
»A2 - PM : D14 - 2045 DO SOMETHING, PM :

Summary of network performance

	AM		
	Total delay (PCU-hr/hr)	Highest DOS	Number oversaturated
	AM - 2019 BASE YEAR		
Network	21.92	61% (TS 2a/1)	0 (0%)
	AM - 2030 DO NOTHING		
Network	25.11	70% (TS 2a/1)	0 (0%)
	AM - 2035 DO NOTHING		
Network	27.09	75% (TS 2a/1)	0 (0%)
	AM - 2045 D0 NOTHING		
Network	29.35	81% (TS 2a/1)	0 (0%)
	AM - 2030 DO SOMETHING		
Network	28.67	70% (TS 2a/1)	0 (0%)
	AM - 2035 DO SOMETHING		
Network	30.96	75% (TS 2a/1)	0 (0%)
	AM - 2045 DO SOMETHING		
Network	33.65	81% (TS 2a/1)	0 (0%)

	PM		
	Total delay (PCU-hr/hr)	Highest DOS	Number oversaturated
	PM - 2019 BASE YEAR		
Network	25.71	59% (TS 4a/2)	0 (0%)
	PM - 2030 DO NOTHING		
Network	29.86	69% (TS 4a/2)	0 (0%)
	PM - 2035 DO NOTHING		
Network	32.43	74% (TS 4a/2)	0 (0%)
	PM - 2045 DO NOTHING		
Network	35.48	79% (TS 4a/2)	0 (0%)
	PM - 2030 DO SOMETHING		
Network	35.43	78% (TS 3a/1)	0 (0%)
	PM - 2035 DO SOMETHING		
Network	38.99	82% (TS 3a/1)	0 (0%)
	PM - 2045 DO SOMETHING		
Network	43.59	86% (TS 3a/1)	0 (0%)

File summary

File description

File title	Junction 5
Location	R108 SOUTH PARALLEL ROAD / OLD AIRPORT ROAD
Site number	
UTCRegion	
Driving side	Left
Date	11/06/2018
Version	
Status	(new file)
Identifier	
Client	
Jobnumber	22-091
Enumerator	DOMAIN\Traffic
Description	

Model and Results

Enable controller offsets	Enable fuel consumption	Enable quick flares	Display journey time results	Display OD matrix distances	Display level of service results	Display blocking and starvation results	Display end of red and green queue results	Display excess queue results	Display separate uniform and random results	Display unweighted results	Display TRANSYT 12 style timings	Display effective greens in results	Display Red-With-Amber	Display End-Of-Green Amber	c m

Units

Cost units	Speed units	Distance units	Fuel economy units	Fuel rate units	Mass units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
£	kph	m	mpg	l/h	kg	PCU	PCU	perHour	s	-Hour	perHour

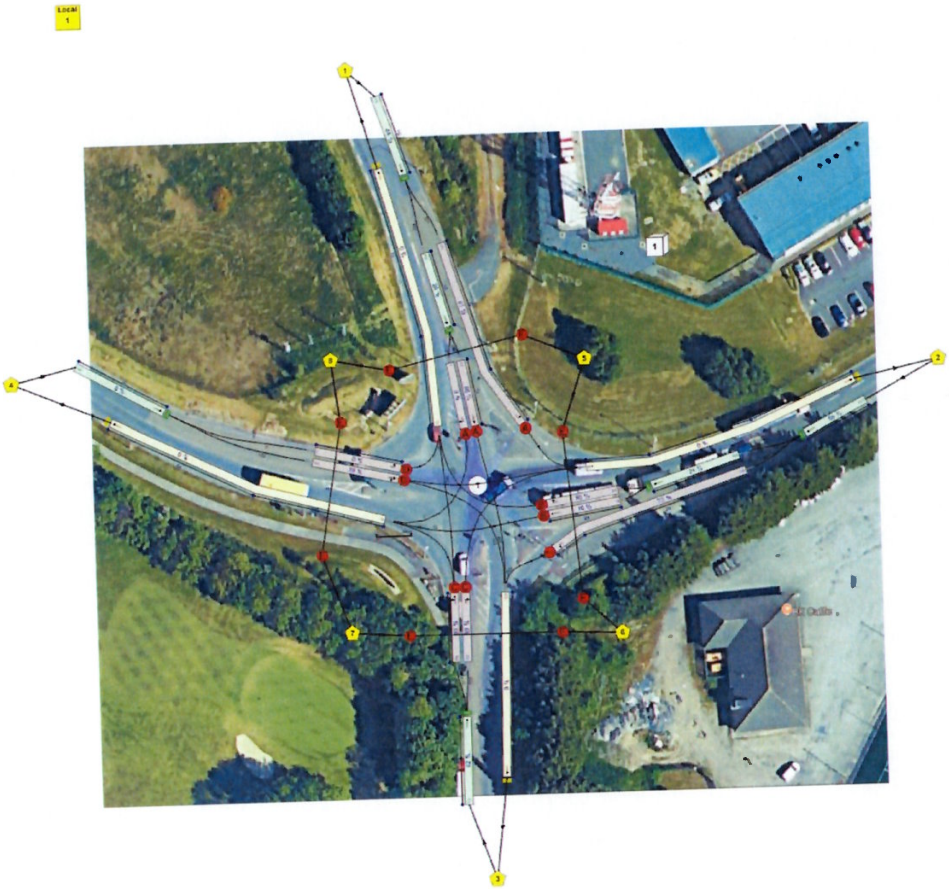
Sorting

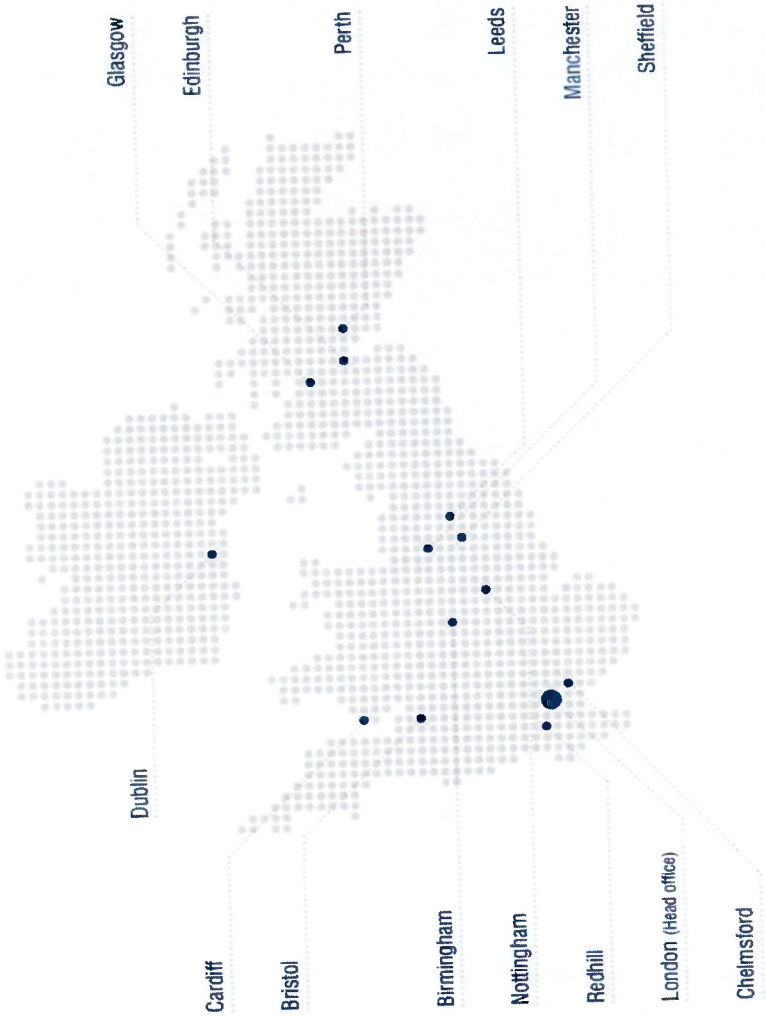
Show names instead of IDs	Sorting direction	Sorting type	Ignore prefixes when sorting	Analysis/demand set sorting	Link grouping	Source grouping	Colour Analysis/Demand Sets
	Ascending	Numerical		ID	Normal	Normal	✓

Simulation options

Criteria type	Stop criteria (%)	Stop criteria time (s)	Stop criteria number of trials	Random seed	Results refresh speed (s)	Average animation capture interval (s)	Use quick response	Do flow sampling	Uniform vehicle generation	Last run random seed	Last run number of trials	Last run time taken (s)
Delay	1.00	10000	10000	-1	3	60	✓			0	0	0.00

Network Diagrams



Junction 5
Cycletime 0s / 100s
Timestepa 99 / 100
2, 14
Diagram produced using TRANSYT 16.0.1.8473

UK and Ireland Office Locations