

File With

SECTION 131 FORM

Appeal No

PL-500739-DF-26

Defer Re O/H

☐

Having considered the contents of the submission dated/received **04/03/2026** from **Fingal County Council** I recommend that section 131 of the Planning and Development Act, 2000 be/not be invoked at this stage for the following reason(s):

NO *No new planning issue*

Section 131 not to be invoked at this stage

☒

Section 131 to be invoked — allow 2/4 weeks for reply

☐

Signed

EO

Donna McNamee

Date

4/3/26

Signed

SEO/SAO

Date

M

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

Task No

Allow 2/3/4 weeks

BP

Signed

EO

Date

Signed

AA

Date

Response

Correspondence Coversheet

Page 1 of 2

Case Number
PL-500739-DF-26

Case Priority
Normal

Case Lodged On
05/02/2026

Case EO
James Sweeney

PA Reg. Reference
FW25A/0480E

Case Details

Planning Authority
Fingal County Council

PA Reg. Reference
FW25A/0480E

Summary Description
Four aviation-related cargo handling units with ancillary office space. EIAR submitted with application

Site Location
Lands within the townland of Huntstown, Swords, Co. Dublin, The subject

Correspondence Details

Correspondence Type
Response

Received From
Fingal County Council

Lodged On
04/03/2026

Validity
NotApplicable

Valid OH Req
No

Issue
BP20 — English

Participant
Fingal County Council

Representative
—

Response Date
Applicable
☐

Number of Days
Allowed
—

Keep Copy of Letter
☐

Return Docs
☐

Keep Envelope
☐

Comments
—

Filing

Attach to File
☐

Return to EO

☒ *Ronan*

Signatures

Signed



James Sweeney, Executive Officer

Date

04/03/2026

Signed



Darragh Burke, Administrative Assistant

Date

05/03/26

Our Ref:- FW25A/0480E Your Ref:- PL-500739-DF-26

From Planning Appeals <planningappeals@fingal.ie>

Date Wed 04/03/2026 3:05 PM

To Appeals2 <appeals@pleanala.ie>

Cc Darija Balciunaite <Darija.Balciunaite@fingal.ie>

1 attachment (213 KB)

FW25A 0480E Appeal Response.pdf;

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

Dear Sir/Madam,

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

Yours faithfully,

Abhilash Nair | Clerical Officer | Fingal County Council
Planning & Development Department
County Hall | Main Street | Swords | Co. Dublin | K67 X8Y2

Comhairle Contae Fhine Gall
Fingal County Council

**An Roinn Pleanála agus
Forbartha**
Planning and Development
Department



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The Secretary,
An Coimisiún Pleanála,
4 Marlborough Street,
Dublin 1.

Our Ref. FW25A/0480E
Your Ref. PL-500739-DF-26
04th March, 2026

**Re: Four aviation-related cargo handling units with ancillary office space. EIAR
submitted with application
Lands within the townland of Huntstown, Swords, Co. Dublin**

Dear Sir/Madam,

I refer to your correspondence dated 09th February 2026 regarding the above application.

The material submitted by the Applicant sets out a number of arguments against the refusal of permission. However, the appeal documents do not elaborate any further in terms of providing a satisfactory rational or justification for the four 'aviation-related' cargo handling units. The Planning Authority is still not satisfied that the proposal meets the requirements of the 'DA – Dublin Airport' zoning objective which is to *Facilitate air transport infrastructure and airport related activity/uses only*.

The matters the Planning Authority consider to be of most importance to supplement the deliberations of the inspector and ACP in reaching a determination are as follows:

Zoning and Airport related use

The site of the proposed development is located in an area designated with the Zoning Objective 'DA – Dublin Airport'. The objective for the DA zoning is to *'Ensure the efficient and effective operation and development of the Airport in accordance with an approved Local Area Plan.'* The vision is to *'Facilitate air transport infrastructure and airport related*

activity/uses only (i.e. those uses that need to be located at or near the Airport). All development within the Airport area should be of a high standard reflecting the status of an international airport and its role as a gateway to the country and region. Minor extensions or alterations to existing properties located within the Airport area which are not essential to the operational efficiency and amenity of the Airport may be permitted, where it can be demonstrated that these works will not result in material intensification of land use.'

Air Transport Infrastructure includes: aircraft areas, air traffic control/tower, ancillary health, safety and security uses, aprons, cargo handling, maintenance hangers, meteorology, retail – airside/duty free, runways, taxiways, terminals and piers.

The proposed units appeared, and still appear, as isolated logistics units with no demonstrable link, other than being in proximate location to the airfield. With no assignment from cargo operators at Dublin Airport, or sufficient documentation to say otherwise, the proposal would presently not comply with the use class permitted in principle for the zoning objective. As submitted at present, these units appear independent of Dublin airport operations and do not fall under aviation 'Cargo handling'.

Section 10.4.5.1 of the Environmental Impact Assessment Report (EIAR) states that *'The warehouse/logistics buildings are speculative, with no confirmed tenants, so exact as set out conditions are unknown'*. This statement provides further confirmation to the Planning Authority that the proposed development relates to an independent logistics hub and not specifically aviation-related cargo handling units.

When discussing EIAR Chapter 9 in the appeal submission, the applicant confirms that *'No Air Dispersion Modelling was carried out as the site functions as a warehouse and logistics complex for Dublin airport and is used as storage which means there are no aviation related air emissions.'* The Planning Officer notes that DAA made a submission at application stage where they explicitly said that they are not in support of this development and that the proposal is for a landside logistics facility that purely benefits from the close proximity to the airport.

Therefore, the 'function' being for Dublin Airport as stated in the appeal submission is incorrect, in particular when considering there is no proposed connection between landside and airside access and no future plans for access to be agreed upon between the applicant and DAA.

Furthermore, section 3.7 of the submitted EIAR states that *'These buildings are to access the airport by way of landside access, although in the future, subject to DAA agreement could be accessible (with minor/modest amendments to the proposed scheme) to provide airside accessible cargo handling facilities'*.

The applicant confirms in their appeal submission that DAA have declined to participate in discussions, therefore this above statement should be disregarded at this point of time until open communication with DAA and the applicant have taken place.

Pre-planning Meeting

Prior to submitting a planning application, two pre-planning consultations were held in relation to the proposed development, which highlighted the shortcomings with the proposal and acknowledged the planning authorities concerns regarding matters such as the appropriateness of the development in line with the zoning classification (DA – Dublin Airport). Both pre-planning consultations concluded that from the submitted documents, it would need to be clearly demonstrated that the proposed units fall under the definition of dedicated Cargo Handling units i.e. Air Transport Infrastructure.

This was not demonstrated at pre-planning stage, nor in the planning application and is therefore considered to be unacceptable.

In addition, the applicant failed in their planning application to acknowledge and address the second pre-planning meeting which had included concerns regarding the proposed use of the units, the principle of development, access arrangements which haven't been supported by DAA, as well as the pre-maturity pending site selection for a third terminal. Furthermore, the applicant failed to include a record of the pre-planning engagement which they stated was included as an appendix in the original application.

Policy

The applicant has stated that they are in alignment with the National Aviation Policy 2015 and that the proposed facility *'whose sole purpose is to handle freight destined for, or arriving from, Dublin Airport is, by definition, airport-related infrastructure.'* The Planning Authority wants to reiterate that insufficient evidence of the 'sole purpose' of the development was submitted, including the reluctance from DAA to *'engage with a view to achieving a coordinated and cohesive approach to the development of the Western Campus'*. The Planning Authority continues to consider the proposal as piecemeal and premature.

The Planning Authority wants to reiterate that whilst the location for 'air cargo related uses' would be suitable in principle at the subject site, the applicant has failed to provide the necessary details for the Planning Officer to consider this proposed development as 'air related' and not an independent warehousing/logistics units. The concerns surrounding the intended use of the units are questioned due to the lack of information provided, not the suitability of the site itself.

Conclusion:

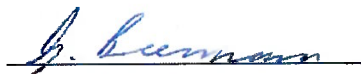
The applicant has failed to provide adequate justification or rationale for the construction of the 'aviation related' cargo units. This has led the Planning Officer to conclude that the proposed development, with a clear show of opposition from DAA, and no further confirmation of landownership regarding future phases at the site, would be premature pending confirmation of aviation related cargo handling occupiers to be in compliance with the zoning objective DA - Dublin Airport and its overall objective and vision.

An Coimisiún Pleanála is respectfully requested to uphold the decision of the Planning Authority.

In the event that this appeal is successful, provision should be made in the determination for applying the following:

- A financial contribution and/or a provision for any shortfall in open space and/or any Special Development Contributions required in accordance with Fingal County Council's Section 48 Development Contribution Scheme .
- Conditions should also be included where a tree bond or a contribution in respect of a shortfall of play provision facilities are required.

Yours faithfully,



Gera rd B reman
A/Senior Planner

Date: 4/3/26