



Irish Air Line Pilots Association's response
to the Commission for Aviation Regulation
Authority's Commission Paper 1 /2014
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Foreword:

IALPA welcomes the opportunity to comment on this your fourth Determination capping the maximum level of airport charges that the Dublin Airport Authority (DAA) may levy passengers at Dublin Airport.

To date IALPA has not engaged with the Commission for Aviation Regulation (CAR) because heretofore daily frustrations experienced by our members operating from Dublin Airport were relayed internally to management pilots. Despite their best intentions, Management pilots were, unfortunately unable to address the concerns expressed by "Line pilots". This is reflected in your draft 2015-2019 determination. Management pilots repeatedly report that they are unable to represent the views of "Line Pilots" as airline policy instructs them to avoid positions which can be used to justify increase in airport charges.

Naturally, rotating airline and retail managers in the DAA are predominantly interested in the short term "Bottom line".

- a) A reduction in passenger service charges in 2015-2019.
- b) The requirement to keep the retail experience fresh and modern.

Retail and cash generating projects are indeed key areas for the DAA whilst Airfield development projects are apparently done as required either for safety reasons, regulatory requirements or structural life exceedances e.g. Apron/ Runway repairs.

It is important that CAR (during every review period) progressively add blocks to the overall DAA Airfield masterplan to ensure that projects will add overall long term benefit and will not merely adopt a haphazard ad-hoc patchwork approach to the development of Dublin Airport e.g.

- 1) Pier 3 Arriving Passengers use of an elevated corridor into T2 passport control.
- 2) CAR's approval for the construction and now apparently Inaccessible / "operationally not in play" stands on the West Apron.

IALPA recommends that CAR review its draft determination to ring fence additional items to the DAA masterplan e.g. Runway 10/28 line up options (CIP 15.6.13), new taxiways and a new Pier 3.

IALPA considers the current draft approval for Apron 5G and dedicated T2 bussing facility to be yet another waste of resources. On a practical side what internal structural modifications, security requirements and associated costs are required within the NEW T2 to cater for Pier 3 & Pier 4 transfers to the bussing facility. In addition how does a T2 departing passenger get from security clearance at Level 3 to the bussing facility?

IALPA:

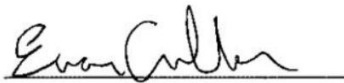
- 1) Have vast experience/exposure and knowledge to a substantial variety of airport ground infrastructures.
- 2) Have demonstrated an ability and capability to operate safely in congested airspace delivering high take-off and landing rates to single runway Airports like London's Gatwick.
- 3) Are more than willing to assist CAR and the DAA to build an agreed AIRFIELD masterplan in a phased coherent logical sequence.

With a modest investment to Dublin's Runway 10/28 and associated unrestricted access and egress taxiway routing then IALPA sees no requirement for a northern parallel runway certainly within the next decade.

IALPA wish to stress that this submission is not intended to embarrass nor attribute fault to any one party. It is merely an observation on past and current decisions which we as key operators within Dublin Airport must highlight.

As CAR adjudicates on ATSC and Passenger charges IALPA suggests that a Dublin Airport "TSAR ", (who would have a holistic approach to both ATC & DAA responsibilities) should be considered to drive overall efficiency. To this end IALPA recommends that both the DAA / IAA CAR reviews should be combined commencing in 2016.

Finally the DAA must devise a practical operational masterplan. A futuristic plan for Dublin Airport without a cross Runway e.g. 16/34 is irresponsible and a RED LINE issue for IALPA.



Captain Evan Cullen

President

Irish Airline Pilots Association

Introduction:

The Commission for aviation regulation (CAR) draft report 2015-2019 naturally reflects on its previous 2009-2014 determination period to assess whether operational, financial and service targets have been met.

CAR brings forward both “Trigger” and outstanding CAPEX (Capital expenditure) projects into the new determination period.

Ryanair claimed in its response to the 2011 ATSC draft determination: “The IAA has confirmed that the design and location of Pier E (4) has resulted in aircraft holding and delays” claiming that the “DAA never consulted with them”.

Recent comments to a Dáil Transport sub-committee by the Chair of the IAA that: “The utilisation of the main runway is among the best in Europe and the number of aircraft it can safely handle per hour is second only to Gatwick, which has a superior ground infrastructure to Dublin, enabling easier access to the runway.”

To IALPA’s dismay neither CAR nor the DAA have addressed the chronic airfield congestion problems associated with the 2009-2014 determination period. This congestion occurs with the conflict of arriving traffic to stands 405 -410 at Pier 4 and Runway 28 departing traffic. Annex A – Consequences of CAR previous determinations.

IALPA suspects that the IAA who controls all surface movements on the airfield was not consulted prior to this draft determination.

CAR employed two consultants Steer Davies Gleave (SDG) and Ernst and Young (EY).

- a. SDG reviewed the operational efficiency of DAA at Dublin airport.
- b. EY reviewed the costs of investment projects put forward and focussed on the proposed costings, and not on whether the proposed investments met the needs of current and future users.

IALPA cannot find any comment from SDG in relation to the operational efficiency of the airfield portion of the DAA campus.

IALPA is of the opinion that inputs from Airlines to CAR is skewed to Landside projects merely out of pure ignorance of pilots interface with Airfield operations.

“And not on whether the proposed investments met the needs of current and future users”

IALPA have reservations that CAR’s pure economics policy may outweigh logic.

Executive Summary:

No doubt the Commission for Aviation regulation (CAR) is happy to deliver and thereby justify its role by reducing DAA passenger service charges during the period 2015-2019 as indicated below

Table 1: Proposed Price Cap, 2015-2019

	2015	2016	2017	2018	2019
Price Cap (€)	10.17	9.68	9.21	8.77	8.35
Annual change (%)		-4.8	-4.8	-4.8	-4.8

Car’s draft determination in effect means that progressively (in order to facilitate Long Haul and Non-EU carriers in Dublin) over time the DAA will transfer a large proportion of T2’s existing EU passengers to the exposed Apron 5G during 2015-2019. This new T2 stand allocation lottery brings a new experience and meaning to the slogan “We Love T2”.

Terminal 2 (2013) Total Passengers EU & Non-EU Destination Split		
	2013	Market Share
EU	7,025,163	74%
Non-EU	2,529,259	26%
Total	9,554,422	100%



Section 2.8 of the CAR 2015-2019 draft determination states:

“DAA also felt our approach needed to place more emphasis on passenger views. We are mindful that the definition of user for the purposes of making a Determination is broader than just airlines, and are interested in receiving the views of the wider airport community on this Draft Determination. We expect the generality of users will prefer a lower price cap and more demanding service-quality standards to the status quo, but would be interested to hear from parties prepared to pay more for an even better service or, conversely, those who would sacrifice service quality in return for even lower airport charges. This Draft Determination is also an opportunity for all users, and not just airlines, to comment on DAA’s investment plans at Dublin airport.”

The Irish Airline Pilots Associations response to CAR is as follows.

Structure of Comments to the Draft Report:

IALPA will comment as appropriate to the 2015-2019 Draft determination in sequential order in red font.

Draft Determination

- 1.3 In subsequent years the price cap will continue to fall, in real terms, by 4.8% per annum. Additional adjustments to the price cap will be made if:
- Passenger numbers exceed 25 million in a 12-month period, to permit DAA to commence work on a second runway; IALPA contends that this 25mppa trigger figure is low when one compares London Gatwick single runway of (55) movements in peak hour compared to Dublin's runway rate of (38) (source DAA CIP page 19). IALPA stress that the IAA rate is predominantly compounded by poor DAA ground infrastructure. A modest CAPEX provision for CIP 15.6.13 in 2015-2019 for Dublin's Runway 28/10 a RET (Rapid Exit Taxi) at ECHO 5 and modified taxiways for B777 aircraft (CIP 15.6.007) will address the current infrastructural inefficiencies.

BASE CASE FORECASTS – SUMMARY		
	2011/12 (<i>actual</i>)	2021/22 (<i>forecast</i>)
Aircraft movements	248,700	279,000
Passengers (<i>millions</i>)	33.8	40.2
Cargo tonnage	88,100	130,400

Looking further ahead, we think Gatwick, with a single runway, has the potential to grow up to around 45mppa by 2030.

Source: Gatwick Masterplan July 2012

- DAA fails to realise results in excess of a target level for various measures relating to quality of service at Dublin airport. The price cap may fall by as much as 4.5% should standards at the airport not reach the standards outlined in Chapter 8 of this report. IALPA maintains that the DAA "quality of service" does not extend to the Airfield as it is not mentioned in Chapter 8. Sitting on board an aircraft after a through the night Atlantic crossing and waiting some 30 minutes for an available wide bodied stand or awaiting taxi clearance due congestion does not even merit consideration as a New Metric.

Consultation Process

1.8 On 31 July 2013 we published an Issues Paper.....We received four responses, from Aer Lingus, DAA, International Air Transport Association (IATA), and the development agencies (Forfás, Enterprise Ireland and IDA Ireland). IALPA notes that the IAA who co-ordinate all aircraft movements did not respond.

1.9 In the first quarter of this year we attended, in an observer capacity, a number of meetings arranged and chaired by DAA to discuss investment plans at Dublin airport with airline users. Following those meetings, in April 2014 we received from DAA a proposed capital investment program (CIP) for Dublin airport for the period 2015-2019. We have placed that document on our website. We have also seen written comments airlines provided to DAA on its investment plans following the meetings. **Did the IAA attend and /or respond during 2013-2014?**

Consultants Retained by the Commission

1.11 SDG reviewed the operational efficiency of DAA at Dublin airport. It met with both DAA and the airlines during its study, which it commenced in December 2013. **Did SDG consult the IAA on the operational efficiency of the Airfield?**

1.12 EY reviewed the costs.....and not on whether the proposed investments met the needs of current and future users. **Therefore CAR ultimately decides current and future needs (possibly without IAA and IALPA input).**

2. Approach to Regulation

2.8 DAA also felt our approach needed to place more emphasis on passenger views. We are mindful that the definition of user for the purposes of making a Determination is broader than just airlines, and are interested in receiving the views of the wider airport community on this Draft Determination..... This Draft Determination is also an opportunity for all users, and not just airlines, to comment on DAA’s investment plans at Dublin airport. **IALPA welcomes this opportunity.**

3. Passenger Forecasts

Table ¹.1: Passenger Number Outturns and Forecast

	2013	2014	2015	2016	2017	2018	2019
Passengers (m)	20.2	20.7	21. ²	21.9	22.5	23.2	23.9
Annual change (%)		2.6	2.8	2.9	2.9	2.9	2.9

Source: 2013 DAA outturns, 2014-2019 CAR forecasts

3.1 We forecast passenger numbers at Dublin airport to grow during the next five years by almost 3% per annum, reaching almost 24 million by 2019. If this forecast is correct, it will mean 2019 passenger numbers will break the record set in 2007. **Are CAR’s passenger forecasts based purely on indigenous Irish passenger growth or does it include transit and possible fifth freedom (Non-EU) airlines transiting Dublin?**

Modelling Passenger Numbers

3.6 As in 2009, we continue to model passenger numbers as a function of Irish GDP. See comment at 3.1 above. The building blocks of the DAA Masterplan i.e. Runway capacity enhancement projects / terminals / piers must progress in tandem to cater for expected increases in airport movements / passenger growth forecasts.

4. Operating Expenditure

General Approach to Forecasting Operating Expenditure

4.3 The forecasts we have used are derived from an efficiency assessment of operating costs at Dublin Airport that SDG conducted for us. Our final numbers differ from the SDG report for two reasons: we are using different passenger forecasts and a different price base.

SDG's Bottom-up Study

4.6 SDG developed estimates for three scenarios. In all three scenarios SDG assumed quality of service will not fall from its current level. The "quality of service" excludes IALPA's current view that the Airfield infrastructure is inefficient.

Relationship with Capital Expenditure

4.17 For approximately 20 of the capital projects in its CIP, DAA makes claims of operating cost savings, primarily under the headings of energy savings or reduced maintenance costs.

4.19 For other capital projects, the claimed maintenance savings have not been fully quantified by the DAA.

4.20 The inability to quantify the savings for operations from capital investments extends to investments in IT..... See ANNEX B: IT –AVDGS (Advance visual docking guidance system).

Top-Down Benchmarking

Comparing Dublin Airport with Other Airports

4.25 Assessing DAA's operating performance by benchmarking against other airports is very appealing and a method supported by responses to our Issues Paper. However, despite many methods put forward by many reports, there is no agreed way to identify a group of comparable airports. And the choice of airports affects results greatly. Not only do airports differ physically, they also have different operating models, providing different products and different service levels. SEE ANNEX C – Dublin v's London Gatwick statistics.

6. Capital Costs

Table 6.8: Trigger Projects in 2009 Determination

Project	Trigger	Triggered	€m
North runway projects	Passenger traffic exceeding 23.5mppa	No	
New apron development	Stand availability in the peak week exceeds 74 stands	No	
Upgrade HBS	Legislation requiring HBS upgrade	Yes	+10.9
Revision to Capital Expenditure Allowance			+10.9

The new apron development 5G will only net nine additional stands whilst the West Apron remains idle.

Capital Expenditure Allowances 2015-2019

6.30 For our price-cap calculations we have allowed capital expenditure by DAA of €308m in the next five years, with a further allowance to construct a parallel northern runway of €296m if passenger numbers reach 25 million. These sums should be more than sufficient to facilitate the efficient and economic development of the airport.....

If CAR approved

- a) Modified access to Runway 10/28 as per the DAA CIP 15.6.13, combined with a new RET (rapid exist taxiway) at Echo 5 (thereby reducing the current ROT runway occupancy time of 58 seconds. Then the IAA would automatically be in a position to deliver increased movements during peak hour i.e. 'sweat the asset'.

Overall Allowance

6.31 Our allowance represents just over half of what DAA proposed in the final CIP that it submitted to us in April. Most of the difference reflects a belief that the projects are not in the interests of current and prospective users..... IALPA beg to disagree as Airfield deficiencies will continue to exist.

6.32 In reaching our conclusions about the needs of current and prospective users, we have to this stage been limited to hearing the views of airlines and ground handlers. They had an opportunity to see an earlier version of DAA's CIP and to attend consultation meetings DAA arranged between January and March 2014 to discuss this document, as well as request clarifications from DAA on projects during the meetings and in written submissions thereafter. The comments made by airlines and ground handlers during the meetings and in subsequent written responses to DAA have informed our thinking on the efficient level of capital expenditure to allow. In building up our capital expenditure allowance, we have made an allowance that would permit DAA to proceed with 38 of the 54 projects included in its final CIP.

IALPA views are therefore submitted at the 11th hour as we were NOT privy to Airline Discussions.

6.34 DAA split its proposed investments into three tranches. As Chart 6.8 above, titled 'Trigger Projects in 2009 Determination' illustrates, most of the amount DAA sought for Tranche 1 we have allowed, whereas we make no allowance for any of the six projects in Tranche 3. Tranche 3 is an area of particular interest to IALPA members.

Airfield Maintenance

Table 6.10: Airfield Maintenance Grouping

Code	Project, €m	DAA	EY	Allowed
15.6.001	Runway 16/34 Pavement Rehabilitation*	24.3	21.6	21.6
15.6.002	Apron Rehabilitation	21.0	22.3	22.3
15.6.006	Airfield and Apron Road	1.7	1.7	1.7
15.6.055	Airfield Taxiway Rehabilitation	16.0	12.5	12.5
15.6.017	Overlay Runway	22.3	29.6	29.6
15.9.022	Airfield Pollution Control*	20.0	22.5	22.5
15.6.004	Airfield Lighting Upgrade (Runway 10/28)*	9.1	8.3	8.3
15.6.009	Taxiway AGL Upgrade	3.9	3.6	3.6
15.4.001	Airfield Vehicles and Equipment	5.7	5.8	5.8
	Total	124.0	127.8	127.8

6.40 We have allowed all projects in the *Airfield Maintenance* grouping. These are primarily projects deemed necessary for the continuing operation of the airport and for maintaining existing assets. This allowance is subject to the rehabilitation of runway 16/34, the overlay of runway 10/28 and the pollution control projects being delivered. **SEE Annex D Runways. Runway 16/34 is key infrastructure when cross wind exceedances are reached on the main Runway 28/10.**

Business Development

Table 6.11: Business Development Grouping

Code	Project, €m	DAA	EY	Allowed
15.6.047	Apron Development 5G*	18.2	16.1	16.1
15.7.120	Bus Lounge Facilities*	13.3	12.0	12.0
15.7.122	Pier 1 Enclosed Gates	1.1	1.2	1.2
15.7.103	Fixed Electrical Ground Power Terminal 1	1.5	1.6	1.6
15.6.021	Cargo Gate Redevelopment	1.8	1.7	1.7
15.6.022	Airport Screening Centre	.8	.9	.9
15.2.017	Consolidated Staff Car Park	1.5	1.7	1.7
15.6.007	Airfield Infrastructure for large aircraft	1.5	1.6	0
15.7.116	Pier 3 Flexibility	15.0	10.5	0
15.4.004	Central Search Area – New Technologies	11.6	11.1	0
15.7.117	Terminal 2 Transfer Facility	21.5	18.7	0
15.7.121	Terminal 1 Arrivals	8.9	8.8	0
15.7.119	Terminal 1 Façade	.7	.5	0
15.4.003	Terminal 2 HBS Standard 3	13.0	12.3	0
15.6.023	Apron 300R	8.2	7.5	0
	Total	118.5	106.2	35.2

* Deliverable

Source: DAA CIP 2015-2019, EY assessment report.

6.41 We have allowed 7 out of 15 projects in the *Business Development* grouping. The allowance is subject to the delivery of apron 5G and the bus-lounge facilities. Apron development and bussing facilities should ensure improved stand capacity; in addition apron 5G should improve access to the runway in the busy hour. Given our allowance for apron 5G, we do not believe that an allowance for apron 300R is necessary. We are also unpersuaded by the need to upgrade the hold-baggage screens in Terminal 2 during the forthcoming regulatory period (should DAA find itself in a situation where an upgrade is mandatory, we would expect users to be receptive to supporting additional spend on this item.) The projects relating to large aircraft (A380s) also seems unnecessary, given the absence of firm commitments from A380 operators. There does not appear to be strong user support for the Terminal 1 redevelopment projects.

“The allowance is subject to the delivery of apron 5G and the bus-lounge facilities.”

Prior to any new apron build IALPA maintains that all options for access to the West Apron must be documented and analysed by ALL stakeholders (including IALPA). It must be stated that IALPA does not per se object to bussing since this is a common feature in some major airports e.g. Frankfurt – Main (EDDF) and Milan - Linate (LIML). It is the IALPA view that bussing should never be a strategic goal of any airport masterplan. Bussing should be a tactical and/or operational contingency. IALPA’s position is that a bussing facility in a re-designed Pier 3 that’s easily accessible to BOTH Terminal 1 and 2 is the best Medium term solution to:

- a) Bussing passengers from Terminal 1 & 2 to the West Apron (IAA and DAA to adopt EDDF (Frankfurt) ramp/airfield bussing procedures.
- b) Service any future increase in remote stand capacity.
- c) Whilst the South apron can be catered from the existing current bussing facility in T2.

(IALPA recommends that Cargo operations be transferred to either the West or Central Apron thereby freeing up the South Apron for either turboprop or Code C Aircraft self-parking stands similar to Milan – Linate)

“Apron development and bussing facilities should ensure improved stand capacity”

Apron Development 5G and Bus Lounge facilities costs a combined 28.1 to deliver a net of NINE additional stands. Apron 300R costing 7.5 delivers FIVE stands that can be facilitated with current bussing lounge.

IALPA views the 300R project as an ideal temporary stand solution with long term asset value i.e. being part of the jigsaw to the phased expansion of taxiways F-inner and F-outer.

“Apron 5G should improve access to the runway in the busy hour”

- Not so when the airport runway system is in dual mode during the busy hour.
- Not so during Low Visibility operations on Runway 10/28.
- During Runway 16 operations Taxiway Delta 3 will become the bottleneck and a tail back of aircraft awaiting departure will directly affect the northern portion of Apron 5G i.e. the new build. Hence this new area will experience some access problems similar to Pier 4.

“The projects relating to large aircraft (A380s) also seem unnecessary, given the absence of firm commitments from A380 operators.” IALPA agrees. In addition Pier 3 current ambiance and rat run to T2 passport control would certainly not appeal to A380 operators.

1.12 EY reviewed the costs of investment projects put forward and focussed on the proposed costings, and not on whether the proposed investments met the needs of current and future users. Going forward IALPA recommends that EY duly consider the IALPA position of sweating efficiency and capacity of Runway 28/10.

Information Technology

Table 6.12: Information Technology Grouping

Code	Project, €m	DAA	EY	Allowed
15.8.008	IT DAA Technology & Lifecycle Man	15.8	15.5	15.5
15.8.009	IT Business Systems Investment	15.6	16.1	16.1
15.5.002	Retail IT	1.6	1.6	1.6
15.8.009c	Business Innovation Investment	8.0	1.9	1.9
	Total	41.0	35.1	35.1

Source: DAA CIP 2015-2019, EY assessment report.

6.42 We have allowed all projects in the *Information Technology* grouping. There are no deliverables. Our allowance was informed both by the work of EY that we commissioned, and a report by KPMG for the airlines and DAA. **See ANNEX B: IT- AVDGS.**

Contingent Projects

IALPA are dismayed but NOT surprised that efforts to enhance the existing runway 10/28 may not have been a DAA priority. SEE Annex C: Runways.

Table 6.16: Projects DAA considered Trigger Projects

Code	Project, €m	DAA	EY	Allowed
15.7.111	Pier 2 Segregation	18.0	19.0	0
15.7.101	Terminal 1 Check-in & Security	38.3	38.1	0
15.6.012	Extension to Runway	55.0	49.6	0
15.6.013	Additional line-up points	30.0	27.9	0
	Fuel Farm	25.0	n/a	0
	Total	141.3	134.6	0

Source: DAA CIP 2015-2019, EY assessment report.

6.46 There were a number of contingent projects in its CIP for which DAA sought an allowance. We have allowed none of them. The Pier 2 segregation project appears to be an expensive option for an aging pier which will be replaced at some stage in the future. The project on Terminal 1 check-in and security does not have the support of Terminal 1 airlines and ground handlers. The runway projects will not be needed as we are allowing the northern runway as a trigger project (albeit with a higher trigger than DAA requested). Should DAA's planned Design, Finance, Build, Operate, Transfer (DFBOT) for the fuel farm fail, we would prefer DAA re-open consultation with users rather than making an allowance now for a sum that has not been subject to any consultation with users.

“The runway projects will not be needed as we are allowing the northern runway as a trigger project (albeit with a higher trigger than DAA requested).” **The increased CAR trigger for the northern runway now exceeds the DAA trigger of 23.5mppa (CIP Page 68) for CIP 15.6.13.**

Northern Runway

Table 6.17: Northern Runway Projects

Code	Project, €m	DAA	EY	Allowed
15.6.019	House buy-out (runway related)	4.3	2.3	296.3
15.6.018	Planning and design fees (runway related)	4.0	4.0	
	Northern Runway	236.8	290.0	
	Total	245.1	296.3	296.3

Source: DAA CIP 2015-2019, EY assessment report.

6.47 We propose to include a single “trigger” project in our Draft Determination, relating to the costs of a new runway. Should 25 million passengers or more use the airport in a 12-month period, we would allow DAA to spend €296m on three projects relating to the northern runway. The price cap would increase by €0.71 for the remaining years of the Determination after the trigger was activated. **SEE Annex D - Runways. IALPA contends that this 25mppa trigger figure is low when one compares London Gatwick single runway of (55) movements in peak hour compared to Dublin’s runway rate of (38) (source DAA CIP page 19)**

6.49 One possibility discussed during DAA’s consultation meetings with airlines and ground handlers, was bringing forward the masterplan and building a new pier in 2018 and northern runway in 2020 (assuming traffic growth accords to the baseline traffic forecast). A user had requested analysis of this option, since it has the attraction of negating the need for some of the projects included in the CIP. DAA’s analysis suggested that bringing forward the masterplan in this way increased total investment costs by €59m in net present value terms. This analysis assumed a cost of capital of 7%. We have re-visited these calculations assuming no rehabilitation of runway 16/34 would be necessary if the runway was being built in 2018 and using the 5.8% cost of capital proposed in this Draft Determination (see below). We still estimate increased costs of bringing forward the masterplan, although the amount is smaller. For this reason, we think it is prudent instead to only make an allowance for a second runway if traffic numbers grow much faster than current expectations.

“A user had requested analysis of this option, since it has the attraction of negating the need for some of the projects included in the CIP.” **IALPA categorically agrees with these sensible options.**

“We have re-visited these calculations assuming no rehabilitation of runway 16/34 would be necessary”. **IALPA respectfully states that the CAR is misguided SEE Annex D: Runways.**

“For this reason, we think it is prudent instead to only make an allowance for a second runway if traffic numbers grow much faster than current expectations.” **CAR proposes a new runway BEFORE pier replacement. So hypothetically if the northern runway were built in 2020. By then Pier 3 will be 50 years old with ongoing associated maintenance issues associated with an ageing building e.g. the current leaking roof etc.**

When the DAA and CAR eventually bite the bullet on a Pier replacement programme (driven hopefully by increasing passenger numbers >25mppa) by deduction the DAA must revert back to rented temporary porta cabins terminals (akin to the Pier 1 saga: DAA can advise CAR on rental costs associated with the temporary Pier 1). The cost of this temporary porta cabin terminal and passenger discomfort must be factored AGAIN into “a user requested analysis of this option”.

The CAR statement that “EY reviewed the costs of investment projects put forward and focussed on the proposed costings, and not on whether the proposed investments met the needs of current and future users”. Is of no consolation to future users of a porta cabin terminal in mid-2020’s Ireland.

IALPA consider it prudent that CAR have:

- Modern efficient Piers to cater for an expected increase in passengers BEFORE a new northern runway.
- A balance of passenger volumes between BOTH terminals hence PIER 3’s future is best served by total integration with T2.
- A combined bussing facility (at ground level in a NEW Pier 3) to cater for both T1 and T2 passengers capable of serving ALL passenger to ALL remote stands.

6.50 The trigger is now set at 25mppa, up from the 23.5mppa we used in 2009. The increase reflects the fact that DAA and other stakeholders have undertaken work since then to increase the capacity of runway 10/28 in the peak hour. Stakeholders have indeed started efforts to increase capacity. However it must be stressed that an IAA official has stated “**the limiting factor at Dublin is not ATC capacity, although it is not limitless, but rather the nature of the ground infrastructure.**” IALPA’s recommended ground infrastructure improvements will address the IAA’s concerns.

And RYANAIRS comments in its response to the 2011 ATSC draft determination: “**The IAA has confirmed that the design and location of Pier E (4) has resulted in aircraft holding and delays, claiming that the “DAA never consulted with them”.** Has the IAA suggested ground infrastructure improvements to the DAA?

6.51 A second runway will not necessarily permit more movements at Dublin airport in the peak hour. There are other factors that may constrain capacity at the airport. One concerns the possible need for a new control tower for air traffic control purposes. Another risk is the ability of NATS to handle additional flights originating from Dublin as it enters UK airspace. Parties are invited to comment if these or any other factors are relevant and, if so, how they should be treated when deciding what allowances to make for the costs of building a second runway at Dublin airport.

SEE ANNEX D Runways.

Profiling

6.53 For four projects in its CIP, DAA has indicated that it intends to start work in 2014. The four projects are ..

- runway 16/34 pavement rehabilitation
- airfield taxiway rehabilitation
- overlay runway
- digital advertising pods.

IALPA supports runway 16/34 pavement rehabilitation for continued long term permanent service.

8. Quality of Service

As stated, Quality of service does not extend to extensive arriving queuing for access to Pier 4.

8.5 DAA will be responsible for collecting data to measure service-quality performance. We will publish the results in a timely manner. Any failure by DAA to provide the results on time will be treated as a breach of the target. Should DAA advise us that it is unable to collect the data in a suitable format, we may waive the format or substitute in an alternative means for measuring the target. This precaution might apply, for example, if ACI ceased to run the passenger surveys on which many of our targets are currently based. **Should Airlines provide arrival taxi delays to Pier 4?**

Transfer security search queues

8.14 The security queue targets will not apply to transfer security queues. This is despite Aer Lingus suggesting such a metric should be introduced and the development agencies stating the importance of transiting passengers' experience.

8.15 There are various reasons why we have decided not to introduce such a target. We are keen for the quality of service regime to focus attention on a few key areas that benefit the generality of users. Transit passengers represent a small subset of passengers at Dublin airport. Moreover, these passengers are the segment of DAA's passenger base for which competition from other airports is perhaps greatest, arguably muting the need for regulatory intervention. Such passengers do not have to use Dublin airport if DAA fails to provide a good transfer product.

If its government policy to promote Dublin as a secondary hub and a transfer airport of choice then IALPA expects that CAR will ensure a quick efficient hassle free process from inter terminal security screening to the US pre-clearance facility. Missed connections due to protracted slow transfer procedures will damage DAA's reputation.

No New Metrics

8.22 The service-quality regime includes no additional metrics to the regime currently in place. Aer Lingus suggested that a metric relating to stand allocation should be introduced. We have rejected this suggestion. We think it could lead to perverse incentives, with airlines that most valued access to a contact stand being denied access so as to satisfy a service quality target. **UAE customers may endorse Aer Lingus suggested metric if they have not already demanded one by now from the DAA.**

9. Other Issues

Statutory Objectives

10.4 When making a Determination for airport charges, we have three statutory objectives. They must be read together and in light of one another.

- To facilitate the efficient and economic development and operation of Dublin Airport which meet the requirements of current and prospective users of Dublin Airport.

- IALPA contends that CAR has failed to address the congestion problems (acknowledged by the DAA, IAA, Airlines and IALPA) associated with its previous determination period.

- To protect the reasonable interests of current and prospective users of Dublin Airport in relation to Dublin Airport

- IALPA contend that T2's domestic short haul passenger's interest have not been met and that Aer Lingus operations will be seriously damaged with a mission creep policy of the DAA to exclude short haul operation in preference to new Long haul and NEW non EU customers.

- To enable Dublin Airport Authority to operate and develop Dublin Airport in a sustainable and financially viable manner

- We welcome CAR's scrutiny on behalf on Taxpayers.

Statutory Factors

10.8 There are nine statutory factors that we must have due regard to when making a determination governing airport charges.

The restructuring including the modified functions of Dublin Airport Authority

The level of investment in airport facilities at Dublin Airport, in line with safety requirements and commercial operations in order to meet the needs of current and prospective users of Dublin Airport

10.10 We assess DAA's CIP in Chapter 6 and arrive at an allowance that we think constitutes an efficient level of investment in airport facilities at Dublin Airport to meet the needs of current and prospective users, having regard to safety requirements and DAA's commercial operations.

IALPA suggests that a comprehensive Market survey be carried out to gauge if T2 short haul passengers welcome the T2 lottery of a departure from Stand 410 / Stand 303 or bussing to Apron 5G.

The level of operational income of Dublin Airport Authority from Dublin Airport, and the level of income of Dublin Airport Authority from any arrangements entered into by it for the purposes of restructuring under the State Airports Act 2004

Costs or liabilities for which Dublin Airport Authority is responsible

The level and quality of services offered at Dublin Airport by Dublin Airport Authority and the reasonable interests of the current and prospective users of these services

As stated, quality of service does not extend to the Airfield nor transit passenger screening.

Policy statements, published by or on behalf of the Government or Minister of the Government and notified to the Commission by the Minister, in relation to the economic and social development of the State

The cost competitiveness of airport services at Dublin Airport

Imposing minimum restrictions on Dublin Airport Authority consistent with the functions of the Commission

Such national and international obligations as are relevant to the functions of the Commission and Dublin Airport Authority

10.19 National and international obligations evolve over time and could be subject to change during the next five years. In making this Determination, we have had regard to those requirements that are currently in place. **Has CAR factored in the Governments draft 2014 National Aviation Policy?**

10.20 Since 2011 we have been the Independent Supervisory Authority for the purposes of the Airport Charges Directive. This does not change our role in determining the overall price cap within which DAA is to set its airport charges. The Directive, as it applies in Ireland, does require DAA to consult with airport users in regard to the system of airport charges, the level of airport charges and, as appropriate, the quality of services provided. We have had regard to such consultations in making this Determination. **In relation to airfield congestion IALPA expects that CAR will consult with the IAA Director of ATM Operations & Strategy and consider IALPA's views in the final determination due in Sept 2014.**

10.21 We have had regard to DAA's safety and compliance obligations under national law, including the Air Navigation and Transport Acts, 1936 to 1998, as well as legislation relating to the IAA. We have also had regard to the security, immigration and health and safety requirements that airports are subject to because people use them to enter and exit the State. **Should the DAA build a northern parallel runway then the IALPA red line position is that Runway 16/34 remains in service.**

Annex A: Consequences of CAR previous Determinations

Terminal 2.

The Problem:

Ref: DAA CIP Page 23

“The processing capacity of T2 check-in will represent a system constraint during the CIP period 2015-2019 without remedial action”

“DAA proposes to rebalance demand for check-in between T1 and T2 to utilise available capacity in T1. Such a rebalancing would not, of itself, require capex investment; however such a rebalance can only be achieved through the relocation of airlines from a T2 zone of operation to a T1 zone of operation. Indications from airlines which could be relocated are that this would only be acceptable if the ambience offered in T1 is similar to that of T2.”

“An important point to emphasise here is that T2 is constrained with regard to contact stand capacity as well as check-in capacity. Moving airlines from T2 to T1 can address both of these issues, increasing take-up of spare check-in capacity in T1, with ready access for passengers to stands on Piers 1-3. (See proposals later with regard to Pier 3 Flexibility). “

IALPA comments below assume:

- a) That CAR adopted the same philosophy in previous determinations ie that consultants “reviewed the costs of investment projects put forward and focussed on the proposed costings, and not on whether the proposed investments met the needs of current and future users”.
- b) Ryanair assertion on the DAA CIP Page 42 is true that: “The DAA is targeting long haul growth and the DAA admission that its actions are dictated by Government policy”.

IALPA comments

- 1 CAR approved expenditure on T2 with Insufficient stand capacity. Stand capacity has become the limiting factor at T2 after only 4 full years of operation.
- 2 2011 was the first full year of T2 operations and in 2015 the DAA is moving domestic airlines out of T1 (to make way for NEW non-EU carriers)
- 3 “Indications from airlines which could be relocated are that this would only be acceptable if the ambience offered in T1 is similar to that of T2.” Why accept eviction and be forced to accept a lower standard? A major backlash could loom from Irish (EU bound) travelling public.
- 4 The priorities in the Government 2014 draft aviation policy include among others
A “Taking a liberal approach to fifth freedoms in order to encourage more airlines into Ireland”
B “The development of Dublin airport as a secondary hub airport for transit to the US for passenger from the UK and across the EU”.

Going Forward Domestic airline operations will be forced out of T2 with duplication of airline resources due to a DAA / Government “Cead Mile Failte “policy. This policy could quickly overload the US pre-clearance ground floor facility in Pier 4.

Pier 4 Taxiway Congestion problems.

The Problem: (Acknowledged by the DAA, IAA, Airlines and IALPA.)

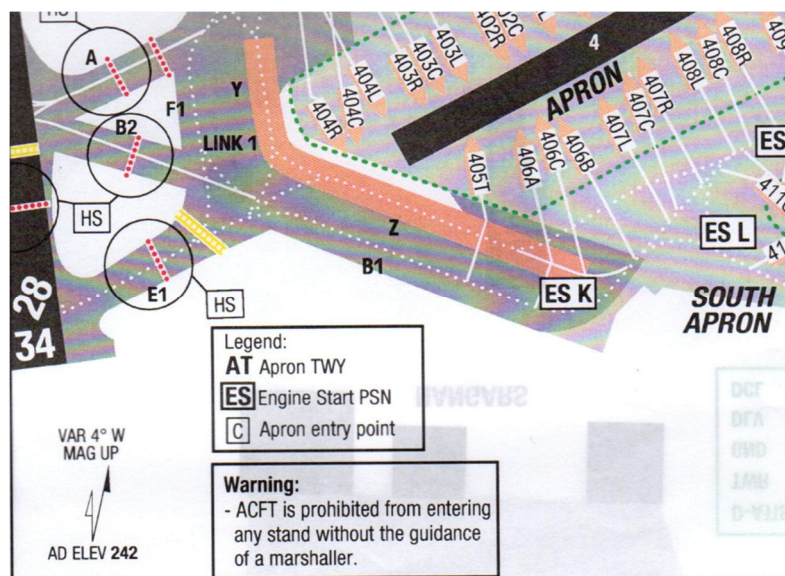
With the opening of T2 in 2010 it soon became very evident that access to and from Stands 405-410 (on the eastern side of Pier 4) was problematic. Currently aircraft queuing for departure off Runway 28 on F1 and E1 are the main obstacle. The second obstacle is aircraft taxiing on B1 (from the eastern side of Pier 4) joining the departure queue on E1 is the second obstacle.

According to Ryanair in its response to the 2011 ATSC draft determination: “The IAA has confirmed that the design and location of Pier E (4) has resulted in aircraft holding and delays” claiming that the “DAA never consulted with them”.

The originally designed bypass taxiway Y (Yankee) and Z (Zulu) was opened very briefly but soon closed due to a near miss between two incompatible aircraft on F1 and Y. ONLY two compatible Code C aircraft could be assured a safe smooth counter flow to the eastern side of Pier 4.

Code E (wide bodied) aircraft using B1 would collide with a counter flow Code C aircraft on Z (Zulu)..

The IAA (Irish Aviation Authority) ground controllers are responsible for all aircraft surface movements in Dublin. Extreme vigilance (particularly during foggy conditions) would be required to ensure separation limits are not breached and it is doubtful that this bypass (as presently constructed) will be opened without further modification/extension to the apron area.



The Consequences:

A failure by CAR to address this problem in its 2015-2019 Determination will guarantee unnecessary excessive fuel burn, long taxiing time and both pilot and passenger frustration for yet another five years.

The Solution:

Extend the apron south of B1 and/or incorporate this infrastructural solution with IALPA's preferred option, DAA CIP 15.6.13.

The Visual problem:

The problem outlined above (accessing Stands 405-410) is graphically shown following the arrival on an Aer Lingus A320 aircraft from Manchester at 15:21hrs (UTC) on 3rd June 2014.

Having vacated Runway 28 at ECHO 5 with minimum ROT (runway occupational time). A Code E (wide bodied) aircraft on ECHO 1 is given line up and take off clearance from Runway 28. Two Aer Lingus A320 aircraft (in photo frame) move forward in sequence to hold short in turn of the active Runway 28 on ECHO 1.

The pilot (having arrived from Manchester) is advised by ATC to taxi onto the Bravo taxiways and to cross (the non-active) Runway 34 and to hold on Bravo 2 short of Link 1.

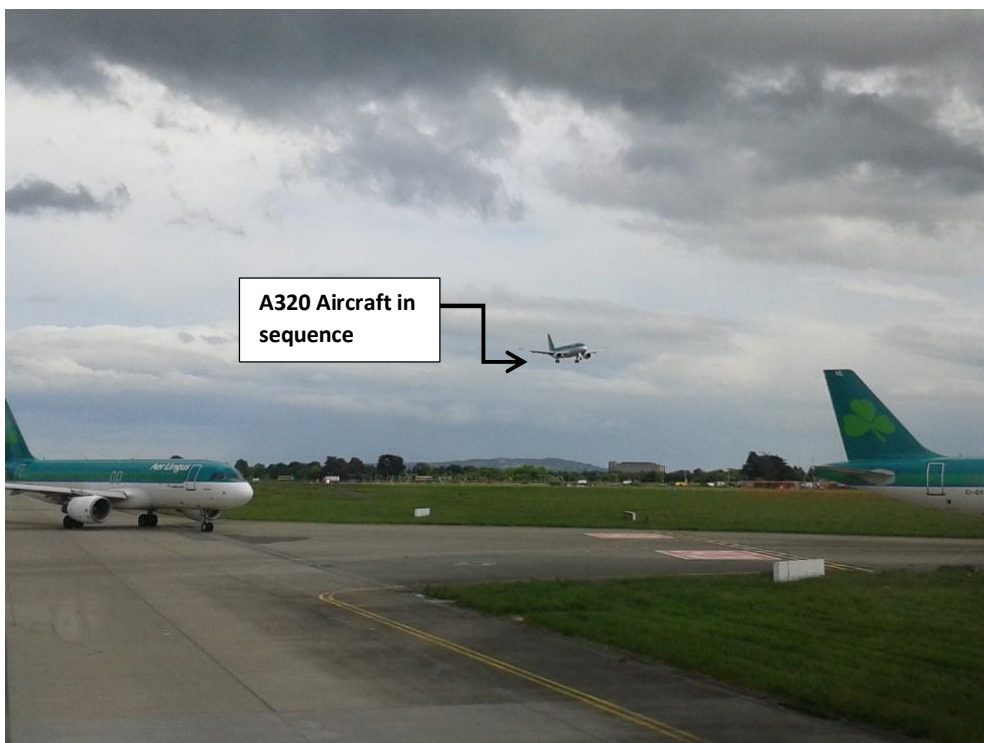
This picture taken at 15:26hrs UTC (five minutes after landing) shows the inbound Manchester aircraft route blocked ahead and a landing CityJet RJ approaching Runway 28.



This photo taken at 15:28hrs UTC shows the Cityjet RJ on short finals to Runway 28.



This photo taken two minutes later at 15:30hrs UTC shows an Aer Lingus A320 aircraft in sequence behind the Cityjet RJ who is now on the Bravo taxiways.



This photo of the FMS (Flight Management System) of the inbound Manchester aircraft shows the info associated with the Flight from Manchester (EGCC) to Dublin (EIDW) .

Note the 9 minutes from push back (Blox-OFF) to airborne (Takeoff) in Manchester in comparison to the 13 minutes taxiing from landing at Dublin at 15:21hrs UTC to coming onto Stand 408 at 15:34hrs UTC.

This off peak taxi time if unrestricted would last a maximum of 5 minutes.



From another angle one month later...

At 16:42hrs UTC on 3rd July 2014 taxi clearance from ES L (Engine Start point Lima) is denied as ATC must first clear the aircraft hidden BEHIND the Aer Lingus A320 to Stand 408.



These restriction would NOT exist if CIP 15.6.13 was approved by CAR.

West Apron.

The west apron was built during the boom years with full expenditure approval from CAR. In 2014 we have the following comments from the DAA.

P21 DAA CIP:

“Over the course of the determination period it was evident that on an operational level only the stands to the East of Runway 16-34 are in play (fully operational).

P 126 DAA CIP: 15.6.047: New Apron Development 5G.

“While the airport has 94 (narrow-body equivalent) stands in total, 71 are available as fully operational stands (contact / remote) on the apron east of Runway 16/34. This apron is used for both passenger and integrator cargo aircraft operations and from time to time, executive aircraft. Current utilisation data identifies during the peak week of 2013 an average daily demand of 71 stands, peaking at 74.”

IALPA comment:

1. Money may have been squandered on 23 inaccessible stands on the West apron.
2. IALPA is unaware of any DAA infrastructural/ engineering proposals / procedures for bussing access to the 23 stands on the West apron.
3. Meanwhile the Car determination 2015-2019 allows € 16.1m to develop Apron 5G a project that will only “net 9 additional stands” East of Runway 16/34.

IALPA encourages the DAA to access the West Apron, initially with the transfer of Cargo aircraft to free up the south apron thus eliminating the requirement for Apron 5G. In addition IALPA suspects that some spare capacity may exist at PIER 2.

Annex B: IT – AVDGS (Advanced visual docking guidance system)

CAR Draft determination:

4.20 The inability to quantify the savings for operations from capital investments extends to investments in IT. These investments usually have a short asset life, often shorter than the length of the determination.....

IALPA states that IT spend on AVDGS is priceless.

Let's explore the DAA aircraft stand IT interface with Pilots

The Problem: There is none. There is no provision for ACDM (Airport Collaborative Decision Making) on stand. This lack of basic equipment puts Dublin Airport back in the 1960's.

The Reality: IALPA's 365 24/7 Operational "Line pilots" have considerable EU and worldwide exposure to Airport layouts, local air traffic and ground control procedures. Pilots are all too familiar with the challenges of Disruption Management procedures / Emergency plans / contingency plans /recovery of the schedule etc.

When Dublin Airport is under pressure (compounded by the current airfield infrastructure deficiencies) their Disruption management procedures can be compared and assessed against European norms.

In reality, during adverse weather conditions Dublin passengers' de-facto become "hot potatoes" from check-in to the boarding gate. The sense of relief from airline boarding staff is palpable as aircraft doors are closed up for departure and steps / Air Bridge are removed.

At this precise moment aircraft commanders have full legal authority over the all aspects of the voyage/ flight. However, courtesy of the DAA, commanders on stand fully closed up and ready for departure are left in an IT information vacuum.

- Where am I in the OOD (order of departure) sequence?
- How is the weather event going to affect my TOBT (Target off blocks time), TSAT (Target start up approval time), and variable taxi time in order to ensure an airborne slot within a -5 +10 minute window.
- Where am I in the de-icing queue? Do my Airline operations staff / ATC staff know what's really going on?
- What is the current and expected IAA Air Traffic control flow rate (take off/ landing) into Dublin within the next 30mins / 60mins /90mins?
- What ACCURATE information can be passed to passengers?

This IT vacuum can invariably lead to frustrated passengers request to disembark (as the passengers planned meeting and or connecting flight will be missed). In addition passenger frustration can at times be directed to front line Cabin crew.

We trust that CAR begins to get the picture of life in a pressurised aircraft cabin on stand at Dublin without a DAA IT interface with Pilots. DAA in effect have "passed the buck" to the aircraft commander and the IAA.

The Objective – AVDGS (Advanced visual docking guidance systems) at Dublin.

Airports throughout Europe are starting to conform to best Industry standard through a process called ACDM (Airport Collaborative Decision Making). The Bible to the effective running of an Airport during adverse conditions can be found here:

www.eurocontrol.int/publications/airport-cdm-implementation-manual-version-4

Page XV11 states

“Airport Collaborative Decision Making is the concept which aims at improving Air Traffic Flow and Capacity Management (ATFCM) at airports by reducing delays, improving the predictability of events and optimising the utilisation of resources

Implementation of Airport CDM allows each Airport CDM Partner to optimise their decisions in collaboration with other Airport CDM Partners, knowing their preferences and constraints and the actual and predicted situation

The decision making by the Airport CDM Partners is facilitated by the sharing of accurate and timely information and by adapted procedures, mechanisms and tools

The Airport CDM concept is divided in the following Elements:

- Information Sharing
- Milestone Approach
- Variable Taxi Time
- Pre-departure Sequencing
- Adverse Conditions
- Collaborative Management of Flight Updates

Note: Airport CDM is also the name of the EUROCONTROL project coordinating the implementation of the Airport CDM concept on ECAC airports. This project is part of the DMEAN and SESAR programs”.

Page XV111 states:

“An Airport CDM Partner is a stakeholder of a CDM Airport, who participates in the CDM process. The main Airport CDM Partners are:


- Airport Operator
- Aircraft Operators
- Ground Handlers
- De-icing companies
- Air Navigation Service Provider (ATC)
- Network Operations
- Support services (Police, Customs and Immigration etc.)

The Requirement:



An integrated A-VDGS (Advanced Visual Docking Guidance System) are to pilots as...

Departures				14:37
Time	Destination	Flight	Check-in Desk	
21:55	Edinburgh	RYANAIR FR818	Go to Terminal 1	
22:05	London STN	RYANAIR FR228	Go to Terminal 1	
Flights for Saturday, 08 February				
00:20	Bucharest	Lanote RO398	Go to Terminal 1	
05:55	Frankfurt FRA	Lufthansa LH983	Go to Terminal 1	
06:00	Amsterdam	Aer Lingus KL3152	29 - 56	
06:15	Paris BVA	RYANAIR FR024	Go to Terminal 1	
06:25	London STN	RYANAIR FR202	Go to Terminal 1	
06:25	Edinburgh	RYANAIR FR812	Go to Terminal 1	
06:25	Turin	RYANAIR FR9444	Go to Terminal 1	
06:25	Madrid	Aer Lingus EI592	29 - 56	
06:25	Fuerteventura	RYANAIR FR7128	Go to Terminal 1	
06:25	Paris CDG	CITYJET SV6094	Go to Terminal 1	
06:30	Rome CIA	RYANAIR FR9432	Go to Terminal 1	
06:30	Manchester	Aer Lingus EY7980	29 - 56	
06:30	Manchester	RYANAIR FR552	Go to Terminal 1	
06:30	Budapest	RYANAIR FR1023	Go to Terminal 1	
06:30	Faro	Aer Lingus EI490	29 - 56	
06:30	Birmingham	RYANAIR FR662	Go to Terminal 1	
06:40	London LHR	Aer Lingus UA7652	29 - 56	
06:40	Innsbruck	Thomas TOM1626	Go to Terminal 1	
06:40	Barcelona	Aer Lingus EI562	29 - 56	
06:40	Edinburgh	Aer Lingus EI3250	29 - 56	

daa  follow us on Twitter

...FIS (Flight information screens) are to passengers.

Early Visual Docking Guidance Systems are now replaced throughout Europe with more Advanced Visual Docking Guidance Systems (A-VDGS) (ICAO ANNEX 14, Volume 1, Paragraph 5.3.25).

A-VDGS LED screens (when not actively docking aircraft) can also relay Airport CDM flight information and any delay messages to flight and ground crew.

Real time ACDM (Airport Collaborative Decision Making) decisions relayed to Pilots on stand via Advanced Visual Docking Guidance Systems (A-VDGS) is paramount to overall effective command and control by Airport Authorities and ATC particularly during disruption operations.

In the 1970s airports and airlines began using standard Basic Visual Docking Guidance Systems (VDGS) so from a pilots perspective Irish airports remains in the 1960's.

The CAR draft determination includes the following.

Information Technology

Table 6.12: Information Technology Grouping

Code	Project, €m	DAA	EY	Allowed
15.8.008	IT DAA Technology & Lifecycle Man	15.8	15.5	15.5
15.8.009	IT Business Systems Investment	15.6	16.1	16.1
15.5.002	Retail IT	1.6	1.6	1.6
15.8.009c	Business Innovation Investment	8.0	1.9	1.9
	Total	41.0	35.1	35.1

Source: DAA CIP 2015-2019, EY assessment report.

CAR has approved all subheads in the IT Grouping.

Whilst the DAA state on Page 44 CIP 2015-2019:

“Also in response to airline request during consultation, DAA has forwarded details of solutions for the provision of automated docking guidance systems to airlines. Initial feedback from airlines indicated that the proposed solution was viewed as expensive. DAA remains open to the inclusion of this, or an alternative technology, in CIP 2015-2019, if requested”

The DAA are lack lustered with this CAPEX expenditure placing the emphasis on airlines “...if requested”.

This reinforces IALPA’s comments that inputs from Airlines to CAR are skewed to Landside projects merely out of pure ignorance of pilots interface with Airfield operations. In relation to AVDGS the DAA may be capitalising on this ignorance.

The 2014 DAA solution:

Users pay otherwise confusion reigns. In effect pilots lack critical information in this IT vacuum i.e. DAA/IAA crossover. The DAA failure to proactively act means its mantra will continue into the 2015-2019 determination period.

“The DAA would advise all intending passenger to consult with their airlines before coming to Dublin Airport “

The CAR 2015-2019 Period:

Nothing changes. Dublin Airport remains in the 1960's.

IALPA encourages CAR to:

- a) Mandate the DAA to provide this essential IT platform.
- b) Review this IT project as a sub-cap or include it at the expense of another approved IT CAPEX.
- c) That CAR ring fence IT resources to ensure that the DAA deliver and adopt an AVDGS (Advanced Visual Docking Guidance System) system similar to Munich (EDDM).

Annex C: Dublin v's London Gatwick statistics.

DAA historical statistics:

Dublin Airport Aircraft Movements & Passenger History		
Year	Movements	Passengers
2003	177,781	15,856,084
2004	182,175	17,138,373
2005	186,838	18,450,439
2006	196,641	21,196,382
2007	211,804	23,287,438
2008	211,890	23,466,711
2009	176,811	20,503,677
2010	160,320	18,431,064
2011	162,016	18,740,593
2012	163,670	19,099,649
2013	170,357	20,166,783

Source DAA Ops metric report 2013

Dublin Airport (2013) Runway Movements Information				
Runway	Total Movements	% of Runway Movements	Commercial Movements	% of Runway Movements
28	104,463	61%	101,118	62%
10	55,163	32%	53,226	33%
16	6,429	4%	6,202	4%
34	3,205	2%	3,152	2%
HH	1,095	1%	0	0%
NA	1	0%	1	0%
29	1	0%	1	0%
Total	170,357	100%	163,700	100%

Source DAA Ops metric report 2013

IALPA Comments:

- Runway 10/28 represents 95% of aircraft movements.
- The current max flow rate on Runway 10/28 is 38 movements during peak hour (33 departures and 5 arrivals (source DAA CIP page 19).
- The maximum in Gatwick is 53 movements per hour.
- The difference being that Gatwick has: a) better ground infrastructures and b) more efficient early diverging SIDS (Standard Instrument Departure).

The Chair of the IAA recent comment that: "The utilisation of the main runway is among the best in Europe and the number of aircraft it can safely handle per hour is second only to Gatwick, which has a superior ground infrastructure to Dublin, enabling easier access to the runway."

This confirms IALPA position. However the corollary is if and when modifications were made to Runway 10/28 the onus would then fall on the IAA to increase the movement rate.

Gatwick historical statistics:

✈ FIG 4.9

Aircraft movements (Base case)

	2011	2011/12	2021/22
AIRCRAFT MOVEMENTS	<i>(actual)</i>	<i>(actual)</i>	<i>(forecast)</i>
Passenger ATM's	244,364	242,144	272,180
Cargo ATM's	377	354	380
Other movements	6,329	6,181	6,396
TOTAL	251,070	248,679	278,956

BASE CASE FORECASTS – SUMMARY

	2011/12 <i>(actual)</i>	2021/22 <i>(forecast)</i>
Aircraft movements	248,700	279,000
Passengers <i>(millions)</i>	33.8	40.2
Cargo tonnage	88,100	130,400

Looking further ahead, we think Gatwick, with a single runway, has the potential to grow up to around 45mppa by 2030.

Source: Gatwick Master Plan July 2012

IALPA Comments:

- Gatwick's summer 2014 application to the CAA for 53 single runway movements during peak hour is here.

<http://www.acl-uk.org/UserFiles/File/Gatwick%20Summer%202014%20Capacity%20Declaration.pdf>

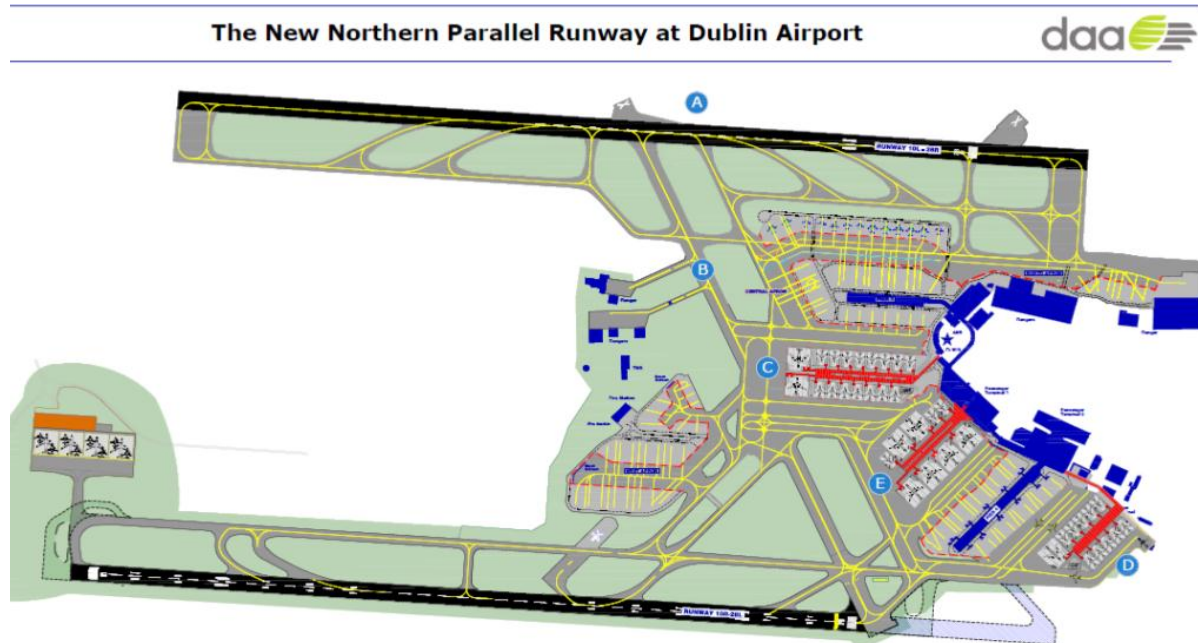
IALPA Recommendation:

- CAR carry out a fact finding visit to observe from London Gatwick control tower the movement rate during peak hour and to observe its ground infrastructure and ACDM facility.
- If CAR approved IALPA's recommended ground infrastructure projects and the IAA were to introduce early diverging SID's. Then peak hour movements should increase above those stated in Table 11 of the CIP (Page 65).
- That the IAA introduces an exchange programme with NATS ATC controllers in Gatwick.

Annex D: Runways

Where is Runway 16/34?

In an ideal world with ZERO wind blowing this is what the DAA want:



However we are not in an ideal world, IALPA underlines the following for emphasis:

Page 47 DAA CIP:

15.6.001 Runway 16-34 Pavement Rehabilitation (€ 21.5m) Runway 16-34 will remain a critical piece of infrastructure until the opening of the North Parallel Runway. The runway is used for dual operations each morning and is critical in keeping the airport open when work is required on the main Runway 10-28. A structural survey carried out in 2013 indicated that extensive structural rehabilitation will be required over the next 5 years in order to keep this critical asset serviceable.

CAR adds to the confusion pre and post northern runway trigger

CAR States: 6.40 We have allowed all projects in the Airfield Maintenance grouping. These are primarily projects deemed necessary for the continuing operation of the airport and for maintaining existing assets. This allowance is subject to the rehabilitation of runway 16/34, the overlay of runway 10/28 and the pollution control projects being delivered.

Car States: 6.49 One possibility discussed during DAA's consultation meetings with airlines and ground handlers, was bringing forward the masterplan and building a new pier in 2018 and northern runway in 2020 (assuming traffic growth accords to the baseline traffic forecast). A user had requested analysis of this option, since it has the attraction of negating the need for some of the projects included in the CIP. DAA's analysis suggested that bringing forward the masterplan in this way increased total investment costs by €59m in net present value terms. This analysis assumed a cost of capital of 7%. We have re-visited these calculations assuming no rehabilitation of runway 16/34 would be necessary if the runway was being built in 2018

IALPA refers the CAR / DAA to the following document:

Northern Runway Planning file: Fingal F04A/1755.

RPS Mc Hugh Page 35 (5th Aug 2005).

“The value of the cross runway to the operation at Dublin is greater than that of the traffic it carries. The value also includes the ability to accept traffic in adverse weather conditions that may be of strategic or national importance given the gateway nature of an airport serving a capital city.

With a runway parallel to the main runway, then use of the cross runway as an alternative during maintenance periods would not be required and it is therefore anticipated that usage, as a percentage of the total, could fall to the levels (approximately 1%) required by limits on permissible crosswinds for safe operations. Noise contour modelling has considered 25 of movements on the cross runway as a conservative estimate.”

DAA CIP 2015-2019 CIP 15.6.001: Runway 16-34 Pavement Rehabilitation.

Project Rationale: Runway 16-34 at Dublin Airport is the cross-wind runway for the airport. The runway acts as the operational runway during significant cross-wind conditions and as the alternative runway when the main runway (10-28) is taken out of service for maintenance. As such Runway 16-34 is a critical piece of airport infrastructure, which is essential to accommodate limited aircraft movements during cross wind conditions, routine maintenance work and the planned overlay of Runway 10-28 in 2016/2017. Runway 16-34 was originally constructed in the 1940s and has been extended and upgraded a number of times between 1949 and 1999. The latest significant upgrade of this runway in 1999 extended the life of the runway by a theoretical design life of 15 years. This upgrade is now life expired. Since 1999, ad-hoc maintenance works have been carried out to retain the runway in service until the overall upgrade of the runway could take place. A Pavement Condition survey of Runway 16-34 in 2013 has determined that the condition of the pavement has now reached the point where a significant improvement programme will be required in order to keep the runway in service. These works include extensive rehabilitation of large portions of the runway surface and the repair of elements of runway drainage systems which have failed.

Reference: An Bord Pleanála inspectors report on the visual control tower PL06F.PA0014 (section 7.2.2) Dublin Airport Authority. “The submission from the DAA draws attention to a statement contained in Annex 2 of the DFS report which gives the impression that operations on Runway 16/34 will be ceased once the second parallel Runway becomes operational. The DAA submission clarifies that no definitive decision regarding the timing of the closure of the Runway 16/34 has been made, and that consultation with the stakeholders will be required on this matter. It is also stated however, that it is accepted by the DAA that it would not be appropriate to base long-term collision risk analysis on the retention of runway 16/34 in operational use. “And in section 9.1.8 the inspector states “that the proposed development has been designed to cater for the future layout of the airport with two parallel Runways and that the proposed development has been designed to take account of all envisaged future developments at the airport including the northern parallel runway and the future developments of lands to the west of the appeals site, (Western Campus) which are indicated in the LAP.

The above quotes indicate confusion as to the future status of Runway 16/34.

IALPA's Concern:

If 28R-10L were built and (through economic /stealth tactics) the DAA were to reduce maintenance expenditure on Runway 16, then this slippery slope could ultimately lead to the closure of Runway 16-34.

Irish people are all too familiar to the effects of Atlantic depressions approaching Ireland from the Southwest. A "Necklace" of continuous Atlantic depressions battered Ireland during Dec 2013 & Jan 2014.

Runway	10	28	16	34	Helicopters	Total
2012 Total	48,051	105,923	3,953	4,492	1,252	163,671
2013 Total	55,161	104,466	6,429	3,205	1,090	170,351
Dec-13	708	9,423	2,227	140	91	12,589
Jan-14	1,695	9,256	1,534	126	81	12,692

The Table above shows (in particular) Runway16 statistics (Dec 13- Jan14). A Dublin Airport with only dual parallel runways would mean that these stats would de-facto become a Dublin airport closure indicator due excessive sustained crosswind on Runway 28/10.

2,227 Flight diverting in Dec 2013 would make a farce of dual only parallel runways.

In addition an airlines inability to recover diverted aircraft within 24hrs due sustained weather would be both serious and embarrassing in "that may be of strategic or national importance given the gateway nature of an airport serving a capital city."

Condition 4 to An Bord Pleanála planning file for the new Runway 28R-10L states:

"The crosswind runway (16/34) shall be restricted to essential occasional use on completion of the new runway in accordance with Objective DA-3 of the Fingal County development Plan, 2005-2011. "Essential" use shall be interpreted as use required by international regulations for safety reasons.

Reason: "In the interest of public safety, residential amenity and the proper planning and sustainable development of the area."

Fingal County Council continues to include this condition as Objective EE56 in the current 2011-2017 County Development Plan.

IALPA insist that the DAA materplan always includes a cross runway e.g. Runway 16/34.

RED LINE: IALPA will vehemently oppose the closure of the cross runway 16/34 at Dublin.

Northern Runway:

The extract below is from the original Fingal planning file.

Need for a second Runway.

“The Dublin Airport Authority states that by 2025, average growth projections indicate that there will be some 38 million passengers travelling through Dublin Airport, with aircraft movements increasing to around 310,000 per annum. High growth projections increase this to 43 million passengers by 2020, with an associated 248,000 aircraft movements.”

CAR Draft 2015-2019 determination states at 6.51:

6.51 A second runway will not necessarily permit more movements at Dublin Airport in the peak hour. There are other factors that may constrain capacity at the airport. One concerns the possible need for a new control tower for air traffic control purposes. Another risk is the ability of NATS to handle additional flights originating from Dublin as it enters UK airspace. Parties are invited to comment if these or any other factors are relevant and, if so, how they should be treated when deciding what allowances to make for the costs of building a second runway at Dublin airport.

An Bord Pleanála planning file for the new Runway 28R-10L is at: www.pleanala.ie Type 217429 into the site search box.

- Dublin’s approved parallel runway 28R -10L planning permission expires in August 2017.
- The Current conditions attached to the Planning permission are onerous and will not permit more movements in the “Peak hour” (0600-0700) i.e. runway NOT in operation.
- IALPA expects the DAA to re-apply for planning under the Strategic Infrastructure Development (Planning & Development Acts 2000-2009) to address the original conditions and mode of operation.

IALPA Comments:

- *“A second runway will not necessarily permit more movements at Dublin Airport in the peak hour.”* So why build a new runway?
- *“Another risk is the ability of NATS to handle additional flights originating from Dublin as it enters UK airspace.”* IALPA maintains Ireland’s economic expansion should not be restricted by possible perceived NATS limitations. Therefore, Eurocontrol should be asked to independently review this alleged airways restriction at the Dublin / UK airways boundary.
- An increase in Dublin TMA (Terminal) traffic will increase IAA expenditure e.g. staffing levels at Dublin Air Traffic Control Centre.

IAA New Visual Control Tower:

The chairwomen of the IAA recently stated to a Dáil Transport sub-committee that “We would like to see the DAA and the government take the initiative to construct a parallel runway. We could then go ahead with our tower project and by 2020 the IAA would be in excellent shape to meet capacity demands at Dublin “

IALPA Comments:

- We support IATA’s comments here under in relation to the new visual control tower.
- Planning reference case number PL06F.PA0014. IATA’s response to CP10/2006 (section 9.4) Capital expenditure (Cap Ex) whereby “the commission should consider introduction of agreed milestones or triggers to incentivise timely and cost efficient investments in major projects such as the control tower.”
- In DAA’s response to CP3/2009 it recommended that a simplistic runway trigger should have been formulated to reflect aircraft movements (the actual driver of runway requirements) rather than an annualised passenger volume. IALPA maintains that modest improvement to runway 10/28 with modified SID (standard instrument departures) will be the key driver to increase movements during the peak hour and that the IAA should be incentivised to increase this number prior to CAR’s approval for a new visual control tower. Passenger numbers/volumes should be the trigger for pier / terminal replacement.
- Whilst we are aware that the New Tower will not affect runway 16/34 approach path we will insist that the IAA confirm in writing that the new tower will not affect existing NPA (non-precision approach) minimum for runway 16/34.
- The DAA’s assertion (in response to CP1/2011 (27/7/2011) states that “*the commissioning and testing of the control tower is estimated to take over four years*”, seems excessive when one considers Heathrow and Manchester’s new visual control tower.