

## IAA RESPONSE SUBMISSION

### CP4/2018 Draft Decision on the Second Interim Review of the 2014 Determination in relation to a Supplementary Capital Expenditure Allowance for Dublin Airport

March 2018

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## Introduction

The Irish Aviation Authority<sup>1</sup> ('the IAA') welcomes the opportunity to respond to the Commission for Aviation Regulation ('the CAR') consultation on the Draft Decision on the Second Interim Review of the 2014 Determination in relation to a Supplementary Capital Expenditure Allowance for Dublin Airport. We have prepared our comments in response to the key issues arising from this detailed report.

Our response is structured as follows:

- In Section 1, we have outlined a set of general comments. These reflect our views in relation to the overall conclusions of the reports in relation to the supplementary capital expenditure at Dublin Airport.
- In Section 2, we have outlined some specific comments in relation to the specific PACE projects, as outlined in the CAR consultation paper.

This submission has been prepared by the IAA Air Navigation Services Provider (ANSP), which is responsible for the provision of safe, efficient and environmentally conscious air traffic management services (ATM) at Dublin Airport.

## Section 1: IAA General Comments

- 1.1 The IAA welcomes the consultation and broadly welcomes the intention to allow for the re-opening of the capital expenditure plans in order to facilitate necessary capital expenditure at Dublin Airport.
- 1.2 It is important to note the growth in traffic and passenger numbers that is driving the requirement for capacity increase and infrastructure enhancements behind the supplementary capital expenditure. There are some concerns that this is being done in a reactive manner and while it is needed due to the traffic and passenger growth, the daa and the CAR should be aiming for progressive long term planning and development at Dublin Airport, spanning a number of regulatory periods and providing

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<sup>1</sup> The IAA is responsible for the provision of air traffic management services in Irish controlled airspace, safety regulation of civil aviation in Ireland and oversight of civil aviation security in Ireland. Full details available on [www.iaa.ie](http://www.iaa.ie)

for continuity growth in terms of safety, capacity, and efficiency. It is important that there is an overall strategic plan for the development of Dublin Airport in the coming years and that all stakeholders are involved.

- 1.3 The infrastructure being developed should aim to improve the safety of operations and deliver further operational efficiency gains at Dublin Airport. Restrictions and limitations at Dublin Airport cause capacity constraints, environmental concerns and impact on operational efficiency. The existing runway, taxiway and apron infrastructure is complex and intricate. New infrastructure should also aim to simplify the existing layouts which will provide for enhanced safety and efficiency. At a minimum, it should not increase complexity because of the safety risks associated with issues such as pilot confusion, air traffic control complexity and assurance of wingtip clearance.
- 1.4 The key to releasing significant new capacity at Dublin Airport is the new North Runway – Any projects which are undertaken in the near-term Supplementary CAPEX period should be fully co-ordinated and thus future-proofed to ensure that they are compatible with the requirements of Parallel Runway operations.

## Section 2: Detailed Comments

This section sets out the IAA ANSP detailed comments on the specific PACE projects, as per the CAR consultation paper.

### 2.1 Terminal/Passenger Processing Projects

The IAA ANSP takes a note of the five terminal and passenger processing projects

### 2.2 Stands and Related Projects

#### 2.2.1 *South Apron Stands Phase 1*

The IAA ANSP takes a note of this project.

#### 2.2.2 *Apron 5H and Taxiway Rehabilitation*

The IAA ANSP position on taxiway routeings is that (in accordance with recommendations of the AAIU) they should be simplified rather than made more complex and that there may be operational problems with a triple lane taxiway (Codes C-E-C) at Apron 5H. The daa should consult fully before this project is commenced.

### *2.2.3 Upgrade and Realignment of Stands 101-104*

The IAA ANSP takes a note of this project.

### *2.2.4 Hangar 1 and 2 stands*

The IAA ANSP takes a note of this project.

### *2.2.5 West Apron Stands*

The IAA ANSP comment on this project is that surface access from the East campus to the West Apron will only be available when Runway 16/34 is not being used as a runway. Even then, it is only possible in certain circumstances as Runway 16/34 is part of the crucial taxiway infrastructure, especially for aircraft to/from Pier 1. Furthermore, it would require follow-me vehicles to accompany surface West Apron traffic and is likely to be a hindrance to the efficiency of ground operations and require additional safety mitigations.

### *2.2.6 Pier 2 Underpass*

The IAA ANSP takes a note of this project

### *2.2.7 Pier 3 Underpass*

The IAA ANSP takes a note of this project.

### *2.2.8 West Apron Surface Access*

The IAA ANSP supports this project if sufficient extra ground movement flexibility can be demonstrated (by simulation). It must be also future-proofed for Parallel Runway operations.

### *2.2.9 Advanced Visual Docking Guidance System (A- VDGS)*

The IAA ANSP supports the provision of A-VDGS (with timing displays) as an important element of allowing operators to comply with A-CDM processes.

### *2.2.10 Fixed Electrical Ground Power (FEGP)*

The IAA ANSP takes a note of this project.

### *2.2.11 South Apron Stands Phase 2*

The IAA ANSP supports the provision of extra stands. However, any further stand provision in the South Apron needs to consider the potential negative effect of any associated taxiway restrictions in this area.

### *2.2.12 Apron Wide CCTV*

The IAA ANSP takes a note of this project.

## **2.3 Airfield Projects**

### *2.3.1 Link 3 Extension Taxiway*

The IAA ANSP supports provision of Link 3 taxiway as it gives significant additional flexibility to ground operations at the airfield.

### *2.3.2 Realignment of Taxiway A*

The realignment of Taxiway A is designed to deliver efficiency and safety benefits, in particular by allowing the simultaneous use of Taxiway A and Taxiway B2 while potentially reducing congestion in the “hot spot”. Providing these objectives can be met and taxiway connectivity enhanced without adding complexity, the IAA ANSP supports this project.

### *2.3.3 Dual Taxiway F*

The IAA ANSP supports this project in general, providing Codes E-E can be facilitated (possibly through revision to EASA provisions). No extra taxiway restrictions or complexity should result.

### *2.3.4 Link 6 Extension Taxiway*

The IAA ANSP supports this project and provision of Link 6 taxiway, as it gives additional flexibility to ground operations at the airfield.

### *2.3.5 South Apron Taxiway Widening (Dual Code E)*

It is the IAA ANSP’s strong view that extra taxiways should not cause taxiway restrictions. Therefore, while the IAA ANSP would support (Code) E-E taxiways in the vicinity of Taxiways B1/Z, subject to regulatory approval.

### 2.3.6 *Runway 10 Line-Up Points*

The IAA ANSP strongly supports Runway 10 extra line-up point project as a way to reduce departure delays when Runway 10 is in use. Indeed, Runway 10 will be the Departure Runway when segregated easterly operations are in use post North Runway introduction.

## **Conclusions**

Overall, the IAA ANSP welcomes the supplementary capital expenditure for Dublin Airport, and associated provision of the additional infrastructure, aimed at providing more efficient airport operations. However, such extra infrastructure must not degrade safety in any way.

Furthermore, IAA ANSP would like to see a consistent longer term plan for Dublin Airport in place. This would provide certainty to the airline operators, service providers and other third parties of developments, costs and other issues for the future.

**ENDS**