DA TERMINAL 3 LTD

Responses to consultation on the timeline for the 2026 Determination.

Submission to the Irish Aviation Authority made by DA Terminal 3 Limited

Friday 3rd October 2025

Executive Summary

DA Terminal 3 Limited (DAT3) welcomes the opportunity to contribute to the Irish Aviation Authority's (IAA) consultation on the 2026 Regulatory Determination.

While the IAA is the fully independent civil aviation regulator for Ireland, responsible for the regulation of aviation safety, aviation security, and consumer interests, we welcome that IAA is now responsible for the economic regulation of Dublin Airport under legislation.

We believe the current infrastructure planning by DAA is insufficient to meet the needs of Ireland's growing passenger demand and fails to uphold the regulator's statutory duty to protect current and future passengers.

It is our belief that DAA's current approach fundamentally fails the IAA's statutory duty to "protect current and future passengers."

The IAA has an opportunity to address some hugely critical issues with far-reaching consequences for transport in Ireland.

DAT3's proposal aligns with IAA's statutory objectives and relevant Government policies, and offers a transparent, cost-effective, and future-proofed solution. The proposed new DAT3 plan addresses the issue of significantly increasing passenger throughput, in both a realistic and sustainable manner.

Key Points

Urgent Need for Additional Capacity

DAA's current plans project a capacity of only 43.5 million passengers per annum (mppa) by 2032+, which is already below forecasted demand. This significant shortfall risks forcing passengers to bear the cost of both current congestion and future emergency expansions.

According to DAA's own studies, the infrastructure application submitted in December 2023 is limited to a maximum capacity of 43.5 million passengers, despite planning for 40 million, a clear indication of constrained scalability.

This will be reviewed by IAA as part of the consultation process.

IAA's Statutory Obligations and DAA's Infrastructure Deficit

The IAA's primary objective is to 'protect and promote the reasonable interests of current and future users of Dublin Airport.' Approving airport charges for infrastructure known to be inadequate for forecast demand fundamentally breaches this mandate.

DAA's 43.5 mppa ceiling delivers insufficient headroom, forcing passengers to pay twice: once for today's constrained infrastructure, again for tomorrow's emergency expansions. This violates IAA's duty to future passengers.

Further, IAA must have 'due regard' to encouraging competition at Dublin Airport. Without transparency on strategic land requirements and capacity planning, critical decisions affecting competition are being determined by DAA's commercial interests rather than regulatory assessment.

Strategic Opportunity: A Third Terminal on DAT3 Lands
DAT3's lands lie within the operational boundary of Dublin Airport and have been identified in the Oxford Economics Report and DAA's own Environmental Impact Assessment Report (EIAR) as suitable for strategic expansion. A third terminal on these lands offers:

- Faster delivery timelines
- Lower comparative development costs
- Reduced disruption to existing operations
- Optimal location for future capacity expansion

Crucially, these lands are proximate to the underpass currently being funded under pressure. Their strategic importance is further underscored by their inclusion in DAA's planning documentation and the Department of Transport's 2018 study. The Oxford Economics Report argues that Dublin Airport T3 lands provide potentially the best location for future capacity.

Expenditure
The cost anticipated by the DAA for its proposed developments and increasing the capacity by a mere twenty per cent is €2.2 billion. For approximately the same investment on a new terminal building, DAT3 will double the capacity.

DAT3, with leading international partners, would fund and build the terminal and make it available to the state.

Transparency and Accountability
DAA's unpublished masterplan represents a fundamental regulatory oversight failure. The 2026 Determination cannot responsibly proceed without:

- Published masterplan showing long-term capacity scenarios
- Clear identification of strategic land requirements
- Assessment of how current charges enable/constrain future competitive infrastructure options

The Department of Transport's 2018 Oxford Economics study specifically recommended early-2020s decisions on third terminal requirements. IAA's determination should require this transparency as a condition of approving multi-year pricing.

Integrated Transport Solution: M2 Motorway Link
The proposed M2 motorway connection is a critical component of DAT3's plan, enabling early road access from the west and alleviating pressure on the eastern campus. This link enhances connectivity, supports regional development, and de-risks future bottlenecks.

DAT3 is aligned with the Fingal County Council 2020 Local Area Plan - Road Network Requirements, which recommends a western Access Route, which will relieve congestion and improve public transport outcomes, in addition to parking expansion.

Alignment with Government Policy
The DAT3 proposal also supports Government policy objectives under the National Aviation Policy, National Development Plan, and Climate Action Plan by enhancing connectivity, encouraging competition, and enabling sustainable infrastructure development.

The decision to advance a third terminal on DAT3 lands is informed by the 2016 Indecon Report "Review of the Regulatory Regime for Airport Charges in Ireland"; and the 2018 Oxford Economics Report, both of which were commissioned by the Department of Transport.

Climate & Sustainability
DAT3 is committed to supporting Ireland's climate and sustainability goals, and future development plans will incorporate energy-efficient and low-emission design principles.

The aim of DAT3 is to set new standards for eco-friendly aviation infrastructure. From energy-efficient systems to smart waste management, the Western Campus and Terminal 3 will embrace innovative technologies and practices that align with the highest standards of commitment to the environment.

Local Authority
The plan for Terminal 3 has been informed by and is fully compliant with Fingal County Council's adopted strategy for Dublin Airport, as outlined in the Fingal Development Plan 2023 to 2029 and the Dublin Airport Local Area Plan 2020. This is a sustainable plan for the Dublin Airport Zone of Fingal and the land for the proposed location of the Western Campus and Terminal 3 has designated zoning for "airport" use. Situated between the two runways at the airport, the land is the optimum location for the campus and a new airport terminal.

Conclusion
Dublin Airport T3 Limited urges the IAA to exercise its full statutory mandate by:

- Refusing to approve charges for infrastructure plans demonstrably inadequate for protecting future passengers
- Requiring immediate publication of DAA's masterplan as prerequisite for pricing determination
- Assessing whether current pricing enables or constrains competitive infrastructure development (per Section 33(2)(i) due regard factors)
- Evaluating strategic land requirements including DAT3 lands identified in government-commissioned studies

Recent government acknowledgement of DAA's planning delays for capacity, underscores the urgency of IAA ensuring its pricing determination does not enable continued drift on strategic capacity decisions.

About DA Terminal 3 Ltd.
DA Terminal 3 Ltd. is the company established by Des and Ulick McEvaddy for the future development of a third terminal at Dublin Airport. In the plan the company sets out a clear vision for the development of a third terminal at Dublin Airport as part of a new Western Campus project, which will become an essential component of transport infrastructure for the future of Irish travel.

Dublin Airport T3 remains available at all times to engage further and provide detailed plans to support the regulator's mandate.

Footnote: According to DAA's own studies, the infrastructure application submitted in December 2023 is limited to a maximum capacity of 43.5 million passengers - a clear indication of constrained scalability - see Table 4.3 on page 25 of Dublin Airport - Airport Capacity Report (Ricondo) submitted to Fingal County Council as part of recent DAA planning submissions found at **https://planningapi.agileapplications.ie/api/application/document/FG/3VENY44TWEREQNDV3ASJEH2FCDP8UTDXZGMXW8EAU34ZHA44U3GG4T8ZYXZ6DTWWSU9GFHMSBW6DE**

This should be reviewed by IAA as part of the consultation process.

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