



## Irish Air Line Pilots' Association

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Commission for Aviation Regulation  
Alexandra House  
Earlsfort Terrace  
Dublin 2

13<sup>th</sup> July 2018

### **Ref: Response to the Issues Paper CP7/2018.**

IALPA Safety and Technical (S&T) welcomes the early initiative by the CAR to ensure that the 2019 Determination succeed in its objective. Whilst 33 submissions were made to the CAR's initial draft 2014 determination we trust that at the outset, all 2019 Determination stakeholders genuinely strive to ensure an orderly functioning airport, that's not only in the interests of competing airline operators but particularly puts passenger welfare to the fore.

Given the infrastructure challenges facing the DAA within the decade we submit the following comments to a) steer the DAA towards a constructive Masterplan, and b) assist the CAR during the 2019 Determination deliberations.

### **IALPA's S&T response to CP7/2018 "Consultation Questions"**

#### **1.0. Policy Development:**

Question 1: Which elements of National and International policy should we have regard to and how?

#### **1.1 IATA Airport Master planning principles:**

The Commissions CP9/2018 at Chapter 5. Other issues: alludes to a "developing Masterplan", this it as it should be, developing. However the CAR is reminded to the fact that:

- a) IALPA S&T highlighted fundamental flaws to a Dual Runway orientation system as outlined in the "Possible Dublin Airport Layout circa 2035" (as promulgated on P30 DAA/CIP05 dated 27 Feb 2009.).

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- b) The IAA SRD subsequently endorsed S&T's stance namely the requirement to retain the existing (third) cross runway 16/34
  
- c) Presently, nearly a decade later, the IAA and S&T continue to voice concerns about the lack "of a completed strategic Masterplan".

Therefore, at the outset of the 2019 Determination it's prudent and necessary that the DAA inform all stakeholders (and indeed the public via its website) of all aspects of the current 2018 Airfield Masterplan incorporating the three runway configuration.

We welcome CAR's alignment with IAA, IATA's and IALPA S&T's position in relation to infrastructure master planning principals. We continue to support this IATA policy and shall highlight to CAR and IAA SRD:

- a) Any DAA ad-hoc (airfield development) funding requests to CAR that compromise safe aircraft ground operations.
  
- b) ANSP approval of CIP items which in our opinion, compromises safety and compounds /complicates aircraft surface movements.
  
- c) CIP projects that require eventual SRD and/or EASA safety regulatory approval.

### 1.2. Airport capacity review:

This report by Oxford and Cambridge Economic consultants (CEPA) is expected during 2018. To ensure transparency for all stakeholders we attach our second CEPA submission at Annex A. The CEPA report to government should in our view, independently inform the CAR as to where CIP expenditure should occur to 2050.

We note CAR's comment at CP9/2018 5.7 & 5.9 and trust that Aer Lingus submitted its requirements for the South Apron expansion to CEPA for consideration.

Additionally, we believe proposals submitted by any airline (which may possibly enhance Dublin Airport) should be transparent and shared by the DAA amongst other stakeholders during the 2019 Determination consultation stage.

Ultimately as previously stated, any aspirational infrastructure project must ensure safe aircraft operations that dovetail into the overall agreed DAA masterplan / CEPA recommendations.

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Past Planning mistakes must be learned from and not repeated. A clear example of which was T2 initial design / location which was conducted without due consideration for contact stands and aircraft manoeuvring apron space. This has resulted in structural inadequacies which now causes and shall continue to cause serious congestion and delays to aircraft and passenger movements.

### 1.3. The National Aviation Policy:

With respect to section:

4.3 State Airports, 4.4 Ownership and Operation of State Airports and at 4.5 the Future Capacity Needs of the State Airports.

- Actions 4.3.1 “Dublin Airport will be promoted as a secondary hub airport” subsequently expanded upon with a Government specific Review Groups Objective / remit to CEPA.
- Actions 4.4.1 “The Department will review the ownership and operational structure of the State Airports in 2019 (and subsequently at 5 year intervals).
- Actions 4.5.1 to “Develop Dublin Airport as a secondary hub supporting services to global markets without weight restrictions”.

Furthermore we understand that the CAR is to consider regularity guidance from the National Aviation Development Forum which ironically consists of stakeholders opposed to economic regulation in the first place.

### 1.4. Fingal County Council (FCC):

Presently FCC is updating the Dublin Airport Local Area Plan (LAP) having published an "Issues paper" on 26/6/2018. We ask that CAR be minded of the previous 2006 LAP which contains a blueprint for amongst others the airside infrastructure access requirements linking the Eastern and Western campus's. Indeed our vision for the Western Campus also conforms to FCC 2006 Airport Local Area Plan at page 41 Implementation: Terminal Development.

We recommended to the Government National Risk Assessment 2018, that a review of the current and future Runway orientation's system to 2050 may expand the 2006 LAP "Airport Box”.

The now embedded importance of the CAR as Economic aviation regulator, combined with the additional responsibility of Aviation Safety oversight, give CAR a strategic role in determining funding for the DAA Masterplan.

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Therefore S&T shall propose in response to the LAP " issue paper", that FCC officially designate CAR a LAP stakeholder in matters relating to overall DAA airside oversight.

Land Use : Dublin Airports Runway orientation:

We understand that a study of land reservation to facilitate runway development was last undertaken in the 1960's.

Provisional S&T analysis of Met Eireann hourly synopsis data from 1941-2016 would seem to indicate that "climate change" if affecting Ireland, in that storms associated with South/ South-Westerly winds are getting stronger.

Bearing this in mind we therefore see (subject to a detailed separate study) a requirement to review the existing cross runway and to possibly re-orientate/rebuild to the West of the Runways 10L&R thresholds.

A Masterplan incorporating and protecting this area for future cross runway development is we believe required. A failure to do so may impact long term airport (resilience/efficiency/development)

### **1.5. Transport Infrastructure Ireland (TII) MetroLink:**

IALPA S&T submitted observations in relation to the proposed MetroLink serving Dublin Airport. However, despite having no visibility of the DAA Masterplan it's important that the CAR understands IALPA's vision requiring full integration of Metrolink with the existing terminals and other modes of Transport within Dublin airport complex.

With a Tunnel boring Machine (TBM) on campus the economic advantage of combining Metrolink with the FCC LAP Internal Access Objective IA2: "To provide a high quality high capacity link between the eastern and western campuses" cannot be overstated. To hasten development and expansion of the Western Campus the initial Metrolink tunnel portal should commence on a greenfield site west of the Control tower.

### **2.0 S&T Proposed Airfield CIP items for stakeholder discussion.**

#### **2.1. Dublin Airport Gateway Runways.**

The DAA is custodian to Ireland's premier gateway and by its own admission are proceeding with their sub-optimal 3110m runway. Current base carrier Long Haul aircraft are unable to depart the

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proposed 28R-10L runway at maximum take-off weight MTOW (maximum fuel for maximum range with full passenger and freight).

Pursuant to the An Board Pleanála (ABP) planning approval in 2007 for 28R, the intervening period has witnessed the introduction into service of more powerful quieter next generation aircraft engines with a commensurate increase in MTOW.

Additionally given the DAA's proposed displaced Thresholds on 28R-10L (thereby restricting landing distances to those similar to the existing 28-10) means that any Commanders immediate overweight emergency return to land decision invariably leads to diversion to a take-off alternative Aerodrome e.g. Shannon in order to avail of the additional 500m of usable/ available landing distance.

In essence the Dublin's new runway offers no additional increased benefit for emergency / serious technical return to land scenarios.

It should also be noted that when constructed 28R-10L Ireland's premier gateway runway shall be shorter than the regional runway at Shannon airport.

Finally it's worth noting that it's the planning authority's (Fingal) responsibility to enforce Conditions imposed by ABP and on 7 Mar 2017 Fingal County Council duly upheld and reaffirmed ABP original conditions under FCC decision order PF/0357/17.

Proposed legislation, enacting noise legislation, to empower the planning authority to discard ABP "onerous conditions" enter uncharted waters within the Planning and Development Act which may be legally contested.

### 2.1.1 S&T Proposal:

A 2019 CIP project to extend this runway to the DAA's preferred 3660m length (Ref: DAA CIP 2010-2014 8.1.3 Physical requirements of new Runway ) is therefore required to fulfil the strategically declared Government requirement.

Whilst we are aware that the CAR refused consultations in relation to Runway 28R length at CP6/2016 this we believe now precedes the Government subsequent remit to CEPA as outlined at 1.3 (Action 4.5.1) above.

A failure by the DAA to advance our proposed CIP Strategic Infrastructure Development (SID) 28R-10L runway extension that combines an ABP request to review / update its 2007 conditions may require the CAR to inform the Minister for Transport of (notified) concerns as to the shortfall in runway performance.

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### 2.2 The IAA ANSP.

The flow rate of aircraft into and out of Dublin (when using Runway 16) is presently unacceptable. Airfield movements on 11th May 2018 proved this point and justified our PACE submission to CAR.

Whilst CAR acknowledged our concerns it's important to reflect on them and ensure SRD regulatory approval in relation to the taxiway system. We submit that the ANSP input to the PACE draft determination lacked clarity and was devoid of the required definitive IAA SRD regulatory approval input.

We stand corrected but a scrutiny of ABP Public Oral hearings documents (associated with Runway 28R-10L) would seem to indicate no ANSP input. Consequently no detail is forthcoming that ensures an efficient Full length departure capability (Take off roll) from Rwy 16, from the Eastern and in future, the Western Campus.

#### 2.2.1 S&T proposal:

A DAA 2019 CIP project to rectify this DAA/ANSP oversight is, we submit, required to alleviate airline OTP woes, improve direct access to the runway 16 threshold thereby alleviating airfield tailback congestion.

### 2.3. The DAA (Terminal & Piers):

The CAR may wish to query the incumbent DAA CEO declared position (in relation to current excess capacity?) whereby apparently T1 & T2 could handle 50mppa without a requirement for a T3.

Such a declaration would seem contrary to An Board Pleanála T2 (phase 2) capacity limit decision and current Eastern Campus airside apron capacity constraints.

Providing additional runway capacity in advance of Pier development can only exacerbate the status quo.

Question : What can be done to improve the regulatory process?



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### 3.1. CAR Oversight.

For the 2019 determination we propose that the CAR adopt a two tier approach namely to act both as an Economic regulator and transition towards its designated Safety regulator role.

During this transitional period, subject to ministerial approval (if so required), the CAR should ensure direct IAA SRD regulatory input/liaison

Pending formal transfer of Safety functions, the IAA SRD could advise the CAR on the legality of safety critical aspects of airfield related CIP projects. This shall alleviate the current "place holder" path approach of advancing CIP planning projects "prior to regulatory approval".

With such support the CAR can with confidence issue a final determination essentially requiring no further discussion between parties.

Additional CAR benefits for example, could incorporate both SRD and IALPA S&T advise to CAR on the DAA airfield Masterplan ensuring that its:

- a) A Future proofed runway orientated airfield Masterplan.
- b) Contains a functioning unrestricted LVP (Low visibility Procedures) taxiway systems to/from the Eastern and Western Campus that:
  - I) Freely feeds the three departure/arrival runways.
  - II) Remains compliant with conditions associated with 28R as promulgated by An Board Pleanála (ABP) PL 06F.217429 at Condition 3.
  - III) Facilitates the ANSP airway route structures design that's compatible and compliant with the approved mode of operation – Option 7b.

For clarity: Within the IAA, the ANSP and SRD both perform totally separate functions. Comments/submissions of the ANSP to CAR must not be construed as definitive as they lack authoritative SRD regulatory approval.

### 4.0. 2019 Determination Consultation Process.

We acknowledge CAR's aspiration that the DAA genuinely consults with IALPA particularly at this critical juncture in relation to the CIP / Masterplan items.



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However, it must be stated that the former DAA CEO having advised IALPA on 22 March 2016 of an opportunity to participate in the major infrastructure review being carried out by the DAA subsequently reneged on that promise.

We expected the “opportunity for stakeholder engagement” and for the DAA make "contact in the following months to obtain IALPA’s views.” Unfortunately this never materialised and this ensured that the DAA PACE consultation programme during 2017 was devoid of an S&T input.

In the absence of, and given our current exclusion by the DAA (known to IAA SRD) from Aerodrome Safety related forums, (contrary to best international practice as promulgated by ICAO,) we expect the newly incumbent senior management within the IAA the DAA to reflect on CAR's comment at CP9/2018 5.3. We have offered the DAA CEO support in advancing 2019 CIP projects however we await a reply.

IALPA has over many years endeavoured to contribute positively in the best interest of all stakeholders. However while acknowledging that CAR has always welcomed our submissions and engagement other stakeholders have endeavoured to marginalise and in some cases prevent our input.

IALPA whom represent 1200 Pilots holding Irish Licences have a particular expertise gained through experience of operating through international airports across the world. That their contribution through their professional representative organisation is not welcomed is a clear indication of sectional interests who are not dedicated to the greater economic good of all who live and work in Ireland.

We however shall continue to ensure that our members voice is heard even if that requires involving EASA and European institutions.

Yours sincerely,

**Capt. John Goss**  
**Director Safety & Technical.**  
*Irish Air Line Pilots Association*

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### ANNEX A

**Irish Airline Pilots Association  
Safety & Technical Committee**

7 March 2017.

Ivan Viehoff.  
Cambridge Economic Consultants.

#### **Irish Airports Capacity Review. Timing, Location, and Funding for T3 at Dublin.**

##### **1.0 Introduction:**

IALPA welcomes the opportunity to participate in this CEPA Phase 2 study relating to the timing, location, and funding for T3 at Dublin.

You are in receipt of our Presentation to Mr Nick Stewart, Oxford Economics and we trust that you are aware of the infrastructural difficulties (combined with planning capacity constraints) associated with the Dublin Airport Campus.

Recent planning approval for (DAC: Dublin Airport Central) has focused minds on the challenges urban planners face when seeking to develop Dublin Airport as a designated “secondary hub”.

At the outset it’s important to highlight:

- The Irish Governments recently announced “National Planning Framework 2040” which may in time allay our heretofore metro capacity concerns.

Items relating to Dublin Airport contained in this report centre on the construction of the DAA’s sub-optimal 3110m Northern Runway and a reversion to an enhanced Airport Metro rail link.

Whilst funding is designated for Motorways and National Primary routes the actual specifics of any road enhancements adjacent to Dublin Airport is unclear. Consequently, when CEPA studies options for a T3 location it’s important to seek input from:

- The local Council, FCC (Fingal County Council), with special emphasis on:
  - (a) The Dublin Airport Local area plan (LADP) road infrastructure enhancements and more importantly for FCC to indicate their funding provision to support various site options for T3.
  - (b) An update on FCC commissioned “South Fingal Study Mk2” which may address access restrictions to Dublin Airport from the “Swords corridor”.
- TII (Transport Infrastructure Ireland) on its timeline to develop and fund a road network to support a possible independently owned, isolated T3, located on the Western Campus.

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- The DAA on options to comply with the Airport Local area plan objective IA2 “To provide a high quality high capacity link between the Eastern and Western Campus”.
- The DAA/NTA/NRA (National transport authority/rail authority) proposals on the route / location and design of the Airport Metro Box, its integration with the existing terminals T1/T2. In addition for them to indicate any proposed future proofing of an underground link to the western campus that’s either, fully integrated (as an enroute metro stop), or alternatively as a DAA stand-alone secure passenger movement link from the existing terminals (airside) to the western campus, thereby meeting objective LADP IA2.

### 1.1 Phase 2 roadmap.

CEPA, having garnered the above information, shall have guidance on how to proceed with Dublin Airport capacity enhancements projects towards 2050.

Capacity enhancements must not only facilitate current base carriers but must also facilitate future interline traffic requiring access to the designated “secondary hub”.

IALPA in conjunction with Oxford/ Cambridge Economics have vast exposure /experience to various airport layouts. Against this background we trust that our input shall transcend transient airport /airline senior managements short term input whom, naturally seeks to minimise airport charges which may ultimately impinge on bottom line profit / bonus.

Finally, CEPA’s airside recommendations made today shall impact our members (spanning various airlines) over a projected 40 year career operating from a Dublin Base.

### 1.2 Current Airfield situation / assessment.

- a) Airport Layout / Zonal, Landside, Airside.
- b) Piers.
- c) Terminals.

#### Airport Layout / Zonal, Landside, airside.

##### Airport Zone:

The current expired Dublin Airport local area plan consists of a rectangular orbital box which encompasses the three runways system 28 -10 L/R and cross runway 16/34.

As previously stated we seek an Oxford/ CEPA recommendation for a review of climate change effects on the current runway orientation system to ensure airport resilience to 2050.

In essence the nasty south westerly / 220 degrees wind (i.e. 60 degree off both Runways 16 and 28) is getting stronger, which may in time, jeopardise overall airport operations to 2050.

The Runway orientation system, last reviewed in the 1960’s requires updating. In time we therefore see a possible requirement to expand the current Airport box in order to re-orientate and relocate a life expired 16/34. This new replacement cross runway should ideally be located out west and perpendicular to the Parallel 28-10 runways.

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### Landside:

The Airport complex landside consists of a one way horseshoe access road which provides separate exit routes from T1 and T2. In time Dublin Airport Central (DAC) traffic shall add an additional third exit route.

Whilst providing efficient landside passenger access to terminal buildings the lack of apron space airside, particularly at T2 was and still is a major planning oversight.

When considering a location for T3 we are somewhat heartened and welcome CEPA's quest to avoid a repeat of past decisions, i.e. those which failed to adequately address BOTH Landside and Airside requirements at the planning stage.

### Airside:

Currently T2's Airside congestion woes can in part be attributed to a flawed initial Pier 4 length combined with the lack of apron space East of Pier 4.

Presently the DAA is constrained by the cross runway and consequently is unable to expand / redevelop Pier buildings on the Eastern Campus.

Indeed contrary to IATA master planning guidelines the DAA has no doubt reluctantly fallen into the trap of ad-hoc catch up development. Such recent developments, demanded by airlines merely distorts/delay the long-term IATA master planning goal which states:

**“The master plan should allow for unfettered incremental expansion of all facilities until the ultimate capacity of the site is attained. No development should proceed until a master plan is in place.”**

Indeed recent comments contained within the DAA's Dec 2017 “(PACE): Programme of Airport Campus Enhancement” leads us to believe that Ireland's 78 year old premier gateway currently lacks an airfield masterplan.

Additionally, draft funding approval by the CAR (Commission for Aviation Regulation), outlined at Commission Paper 3/2018 highlights an extraordinary U-turn by the DAA to proceed with development that contradicts its very own initial screening assessment.

### Piers:

Dublin has four piers, of which two (Piers 2&3) shall require replacement within the next 10-20 years. In the absence of a masterplan we ask:

How or indeed, where can the DAA expand piers (to facilitate secondary hub status) on the Eastern Campus whilst ultimately having to withdraw current piers for redevelopment?

### Terminals:

For reasons unknown to IALPA the notion of a present day T3 requirement is with respect, flawed. We state this as it fails to address the current airside deficiencies.

To facilitate base carriers and more importantly to facilitate competition from interline carriers, the overwhelming pressing requirement now is to develop additional wide-bodied contact stand Pier facilities. This requirement, in our opinion can only be achieved on the Western Campus.

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Creating additional runway (28R-10L) and terminal capacity without first addressing a wide bodied aircraft apron/contact stand Pier requirement is in itself an obvious recipe for future failure. We respectfully flag this conundrum early in CEPA's deliberations.

### 1.3 A New Terminal 3 or new Pier 5?

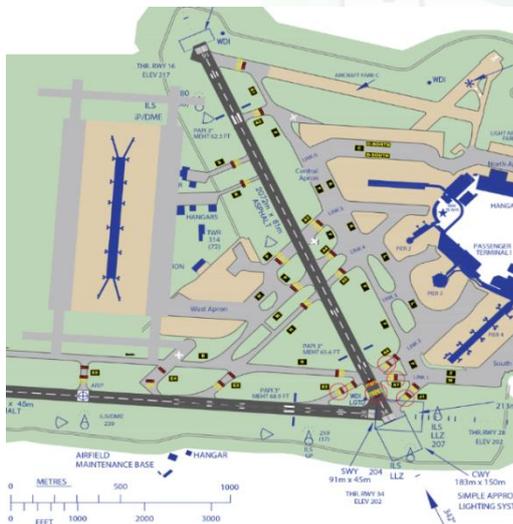
Given the foregoing we compare Dublin (DUB) to Zurich (ZRH) Airport. Both Airports had similar 2017 traffic volumes 29.6mppa /29.4mppa. Both Airports main campus are constrained by a cross runway.

However, Zurich overcame its problem by tunnelling under its cross runway to access a predominately dedicated wide-bodied satellite pier / Dock E.

In 2017 Dock E processed 8.02mppa or 27.3% of the total 29.4m, whilst Zurich overall transfer passengers rose 8.8% to 8.3mppa.

It's therefore blatantly obvious where long term airside master planning should occur at Dublin Airport. Ad-hoc tinkering with the South Apron doesn't provide base nor interline carriers with a solution to 2050.

IALPA therefore propose a new satellite Pier 5 perpendicular to the parallel runways. Thereafter the DAA has optional Pier 6 / Terminal 3 expansion opportunities further west. Additional benefits of Pier 5 is the ability to build "off-site" and finally integrate same with the current "operationally inaccessible" West apron.



Ialpa proposed Satellite Pier 5 above and how it would visually look, similar to Zurich satellite Dock E.

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### 1.4 IALPA Spotlight on CEPA's proposed T3 locations.

#### Location 1:

We refer CEPA to the An Board Pleanála T2 planning file PL06F.220670 Volume 5- Appendix {Chapter 7: Location and Layout issues, 7.1.1 Alternate Sites within the Campus} for the exact reasons why this site can be automatically discarded.

#### Location 2:

Currently T1 has surplus passenger processing capacity whilst T2 is peak hour and US CBP constraint (Note: T2 Phase 2 is outstanding).

Integrating T3 into T1 (as indicated North of Pier 3) does little to develop long haul wide bodied hub traffic (there being no adjacent apron space to park wide bodied aircraft). Therefore this location can also be discarded.

#### Location 3:

The DAA "brownfield site" allocated to DAC was a lost opportunity to integrate a transport hub, additional passenger processing, linking T2 and the West apron.

IALPA's very long term view is that any additional Terminal capacity 35+mppa is best suited on the Western campus as it's:

- (a) In accordance with the Dublin Airport Local area plan and
- (b) Is in keeping with IATA master planning principle of unfettered incremental expansion.

However a present day Pier requirement (akin to Zurich Dock E) must in our view, be constructed first. Additionally, provision can be made to incorporate an enlarged US CBP facility combining Pier 5 internal transfer screening facility akin to ZRH dock E.

The present day requirement for an enlarged US CBP facility (not currently expandable from Pier 4) provides additional security and is the key infrastructural asset that effectively lures passengers to transit Dublin.

### 1.5 Eastern / Western Campus passenger Link.

Prior to T3 construction and to successfully develop our proposed Pier 5 the DAA must:

- Maximise the connectivity /flexibility of both T1 and T2 passenger volumes.
- Construct a Pier 5 access transfer structure between the existing terminals.

Zurich Airport's main terminal airside access to satellite Dock E is via two escalators to passport control/rail link.

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### Conclusion:

Q: Timing for developing Dublin T3?

A: To be reviewed following completion of a present day requirement for our satellite Pier 5.

Q: T3 location?

A: West of Pier 5 when western surface access and associated Terminal services are in situation e.g. Multi story car parking etc.

Q: Dublin T3 Funding and operation?

A: IALPA have guided CEPA to an Airside “secondary hub” solution. We do not wish, nor attempt to, offer any political /financial comment. Suffice to say that a practical symbiotic relationship must exist between any anchor tenant airline, the DAA, the prospective owner/operator of Pier 5 and/or underpass whomever that may be.

We again thank you for the opportunity to comment during Phase 2 and needless to say should you require clarification please do not hesitate to contact me.

Yours sincerely,

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