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Independent Aviation Planning and Infrastructure Assessment

Expert Peer Review of Cargo Handling Development at Dublin Airport in the Context of National Aviation Policy, Airport Expansion Strategy and Long-Term Operational Safeguarding

Sergi Alegre Calero, Dto. General of Airport Regions Council and Board Member of Aeropuerto de Catalunya, has been engaged by D.A. Terminal 3 Limited to peer review and assess the merits of their proposal (under FW25A/0480E) with respect to aviation matters; and to consider whether there is merit or validity with respect to Reason No. 2 of the Planning Authority decision.

Reason No.2 states –

> *The proposed development is located proximate to lands west of runway 1 6/34 indicated in the Dublin Airport Local Area Plan as a potential location for a third terminal (T3). The Planning Authority is not satisfied, on the basis of the information submitted that the proposed development would not prejudice the orderly operation and continued growth of the Airport including the provision of a third terminal and the provision of a western access route to Dublin Airport from the N2 corridor. The proposal is considered to be piecemeal and developer led and fails to present a comprehensive and cohesive approach in ensuring sustainable growth at the Airport is safeguarded. The proposed development is contrary to DA01, DA02 of the Fingal Development Plan 2023-2029 and 803, TP03 & EA05 of the Dublin Airport Local Area Plan and would therefore, be premature and contrary to the proper planning and sustainable development of the area.*

Separately, I have also noted Reason no.1, and have provided some commentary regarding this reason for refusal, as it relates to the aviation aspects of the proposal and the airport.

Reason 1 states-

> *The subject site is zoned 'DA' Dublin Airport under the Fingal Development Plan 2023- 2029, where the objective seeks to 'ensure the efficient and effective operation and development of the Airport in accordance with an approved Local Area Plan'. Having reviewed the submitted planning application and all supporting documentation the Planning Authority is of the opinion that the proposal does not relate to Air Transport Infrastructure - Cargo Handling or airport related logistics and is therefore not permitted under this land zoning use and would contravene materially the development objective in the Fingal Development Plan for the zoning of land as 'DA' Dublin Airport and as such would be contrary to the proper planning and sustainable development of the area.*

Statement of competency

Sergi Alegre is employed as Director General of Airport Regions Council and is a Member of the board of Aeroports de Catalunya. He is additionally a Member of the Advisory Board of ten EU funded projects related to airports, Member of the Advisory Board of Aeroports de Paris, Member of the Spanish Centres of Excellence in Aviation (Spanish Minister of Transport) and Member of ICAO CAEP GW2. Sergi has extensive experience across a wide variety of aviation related areas, including participation in nine EU funded projects related to airports; and author of the following publications related to airport cities: *From Airport to Airport City*, *Sustainable Airport Areas: Guidlines for Decision Makers, Planning, Governance and Economic Development in Airport Area, Airport ownership* and *Kosice Aviation Strategy.*

Sergi has acted as Chair of the full day session of Airports and Territories at Passenger Terminal Conference over the last three years (2022-2025) and additionally has been a key Speaker at various Aviation and Airport development related events and conferences (most recently at events in 2025).

Peer Review – Independent Assessment

After a careful study of (i) the proposed development (under FW25A/0480E), (ii) the applicant's informal Masterplan for the Airport's Western Campus Lands (including that presented to the Planning Authority), (iii) the report and decision of Fingal County Council Chief Executive and (iv) the cited Local Area Plan policies, as well as (v) the Oxford Economic Study of Dublin Airport, the undersigned, Sergi Alegre Calero (Dto. General of Airport Regions Council) considers the following to be of relevance:

In its broadest terms, the proposed development comprises "*four aviation-related cargo handling units with ancillary office space - i. Unit 1 : c. 1 0, 869.7 rn ^{2} (including 940.9 sqm^2 office space) ii, Unit 2: c.9, 1 51 .3 m ^{2}- (including 751 .3 m ^{2} office space) iii. Unit 3: c.6, 024.9 rn^2 (including 497.7 m ^{2} office space) iv. Unit 4: c.8, 577.7 m^2 (including 751.3 rn ^{2} office space). The proposed units will have an overall combined total gross floor area (GFA) of c. 34, 623.6 sq.m (alongside ancillary ESB substations, 4 no. security huts with a combined GFA of 30 sqm and pumphouses). The warehouses are c. 12m in height, with the office element being c. 3.3 m in height and located within a landscaped campus on a site of c. 10.7 Ha.*" Ancillary and enabling parking and other service/utility infrastructure is also proposed.

Supporting Air Transport Infrastructure

In our professional opinion, the application site upon which the proposed development is to be constructed is considered to offer significant benefits in terms of land-use planning and the functionality of the unused space between the two parallel runways of Dublin Airport and the overall infrastructure.

The applicant's approach as outlined in the submitted plans, allows for the dedication of this area almost exclusively to air cargo, which in our opinion is the optimal use of this land, given its proximity to the cross north - south runway which is in use for high cross winds throughout the year and may be used as a taxiway. We understand that the DAA have obtained planning permission for a tunnel from in front of T1 under this runway directly to the western campus, and that they have commenced work on this new infrastructure. We further understand that DHL, Fed Ex and others currently use the western apron to load and unload cargo. It is evident from our assessment of this arrangement, that proposed and permitted tunnel has been designed to facilitate linking the Eastern and Western campuses and to facilitate better access to DAA's own proposal for Apron 7 which wraps around the applicant's proposed cargo site and has been incorporated into the applicant's proposals in their non-statutory Masterplan for the Airport and Western Campus (as per Appendix).

This proposed arrangement, when fully integrated i.e. without undue influence of the DAA as a commercial operator blocking others entering the market, would facilitate air-to-land connections in both directions and, also, allow for the placement of relevant customs control facilities. The siting of aviation related cargo handling at this location, notwithstanding that the DAA may be refusing airside access at this time allows for the future proofing of this use in the future (with minor amendments possible, subject to planning). Several airports with high volumes of cargo operations and tonnage transported have cargo areas located in very similar ways, notably Cincinnati (12th busiest cargo airport in the world) and Louisville Airport (6th busiest cargo airport in the world).

We have reviewed the DAA's submission, and we would draw to the Commission's attention that during the applicant's consultation with the DAA. The DAA advised the applicant that they did not consider there to be a need for these lands in order to facilitate their expansion (as proposed under F22A/0460). However, during our review of their recent applications we believe that the location of the proposed development does in fact help to contain the airport's land use, since air cargo facilities are best sited in direct contact with the airside and have good surface access and their own parking area. Any other location would imply extending beyond the current perimeter of the infrastructure, as well as the construction of new access roads for almost exclusive use, which would also require greater land use. We draw to the Commission's attention the proposal being advanced by the DAA under F25A/1210E) where air cargo is proposed on the opposite side of the R132, with a bridge into the airport required to achieve airside access. This makes little sense from a landuse, aviation efficiency, or economic perspective (in particular when one considers the €250 million cost for the above noted tunnel linking the eastern and western aprons and airport campuses), the currently proposed major bridge construction from the DAA's proposed cargo area over the R132 seems somewhat irrational, in particular when the applicant's lands are available for this very use.

This proposal (under FW25A/0480E) also allows for the consolidation of uses in this large area between the parallel runways—which is undoubtedly the airport's core, given its central location within the overall infrastructure—making it a driving force for development. This intensive use of the area between parallel runways is very common with layouts and uses similar to those outlined in the general vision on which the proposal

is based. Among these airports, we can cite Munich and Athens, among others. (Please refer to Appendix – International Airports – Examples of Good Practice in Airport Layouts & Development).

In our view, the proposed use of the area as a cargo zone, undeniably providing for '*Air Transport Infrastructure - Cargo Handling or airport related logistics*' does not compromise the potential growth of Dublin Airport in any way for the following reasons:

1. It does not affect current operations, as the building heights would comply with current regulations.
2. It would not affect future operations, as there is neither a foreseen nor any reason to change the current operations based on the use of parallel runways.
3. The presence of aircraft parking reservations nearby does not present any incompatibility for airport operations.
4. In the hypothetical case of a decrease in parking area reservations or a dramatic increase in demand—currently unforeseeable given the publicly available information on the growth plans in Dublin of both Aer Lingus and its partner Emerald, as well as Ryanair, the only airlines based at the airport. In this sense, all forecasts from IATA and ACI suggests a slowdown growth in European airports as a general basis—this could be offset by locating some sectors in other currently unused areas of the airport adjacent to either of the two runways, but especially on the apron of the future new terminal.

Compatibility with a future Terminal 3

Regarding the foreseeable construction of a new terminal – Terminal 3 – we are of the professional opinion that the proposed development is not in any way considered an obstacle or impediment to Terminal 3's future location, construction, and development.

We have reviewed the Planning Authority's Local Area Plan for Dublin Airport which reflects the indicative locations for a a third terminal at Dublin Airport (consistent with the Oxford Economic Study) and the applicant's Masterplan for the western campus (as presented on a number of occasions to the Planning Authority, the Department and Minister for Transport, etc) and concur with the views of those experts that the terminal's possible and preferred location at the western end of this large area between the two parallel runways, as reflected in the presented general Masterplan (attached as an Appendix), is, by far, the most suitable and operationally sensible in that this location opens up the most development possibilities for growth and sustainable development at the airport compared to other potential alternatives. The reasons for this consideration are several:

1. The central positioning at this end of the 'western campus lands' between the two parallel runways facilitates rapid aircraft access to either runway, minimising taxi time. This translates into more agile management and reduced fuel consumption, representing economic efficiency and a significant environmental benefit.
2. This positioning would allow for the long-term growth of the area. Conversely, if it were located near the existing terminals (in the area proposed for development), it would seriously jeopardise their long-term future development or, alternatively,

leave large areas unused in the airport's core sector, resulting in significant economic inefficiency.

3. The central positioning at this end of the western campus also facilitates the implementation of all surface access points to the terminal and the construction of the necessary parking areas outside the runway boundaries, with ample room for future expansion if needed. This is in addition to the points mentioned regarding the terminal, and in fact, it does not impede any long-term growth.
4. This location of a new Terminal Building at the end of the western campus is fully compatible with the provision of the proposed Western Access Road, which is an objective of the Local Area Plan, and which could be delivered and is in fact being proposed by the applicant, as has been presented to the Planning Authority, Minister, etc.. The opening up of development of the subject lands, and the planned delivery of a third terminal and airport campus west of the existing terminals and runways will undoubtedly facilitate and support the delivery of the much needed alternative surface access to Dublin Airport.
5. Last, but not least, the central positioning at the end of the western campus framed by the parallel runways allows for high economic value activities to take place between the future Terminal 3 and the inner limit of the current delimitation and the area proposed for its immediate development - the one we have considered and called the "core zone" - which can be geared both towards the needs of the airport system itself - operational support - and, especially, towards high value-added services such as hotels, offices, convention centres, etc.

There are several examples of successful airport layouts following this scheme—a terminal at one end of two parallel runways—among which we can highlight Barcelona, Kuala Lumpur, etc. (Please refer to Appendix – International Airports – Examples of Good Practice in Airport Layouts & Development).

In our view, the hypothetical location of Terminal 3, either partially or entirely, within the development area proposed would entail significant airport management problems. The location of a third terminal in such close proximity to existing terminals would restrict the necessary apron space for its operation and cause considerable interference with the various taxiways and approach paths. These operational restrictions on the airside would limit the size and capacity of the terminal. In other words, this location (ie within the current application site boundary) is only suitable for a satellite terminal connected to the existing terminals, but not for a terminal robust enough to accommodate significant growth in the number of operations and passengers, as was envisaged in the Oxford Economic Study and which could be required were the airport to reach a capacity of c.60 to 70 mpa.

Finally, it is considered that this location (ie the application site) would also generate management problems in aircraft movement should the planned parking reservations materialise, as they would prevent direct access to the two runways. The location, ie. use of the application site for a terminal, would involve "sacrificing" part of the "core area" to transport infrastructure, services, etc., which would not only mean the incorporation of rigidities in terms of easements, but, more importantly, a very significant loss of economic impact and benefits.

CONCLUSION

In summary, following our peer review, and given our extensive experience in Airport development and Aviation Policy Formulation, it is our expert opinion that, the subject lands are most suited for use as 'airport related cargo handling'.

Reason 1 states-

> *The subject site is zoned 'DA' Dublin Airport under the Fingal Development Plan 2023- 2029, where the objective seeks to 'ensure the efficient and effective operation and development of the Airport in accordance with an approved Local Area Plan'. Having reviewed the submitted planning application and all supporting documentation the Planning Authority is of the opinion that the proposal does not relate to Air Transport Infrastructure - Cargo Handling or airport related logistics and is therefore not permitted under this land zoning use and would contravene materially the development objective in the Fingal Development Plan for the zoning of land as 'DA' Dublin Airport and as such would be contrary to the proper planning and sustainable development of the area.*

The applicant's have proposed the use of these lands for such a use, and there is no evidence or reasoning behind the Planning Authority's decision that the cargo handling facilities would not be used and operated by those requiring efficient access to Dublin Airport. While it would be ideal and preferrable for the units to be able to avail of airside access, as the Dublin Airport Authority in effect have ultimate control and can ransom or veto access to the State's Airport Infrastructure, the proposal is the next best approach to facilitate much needed aviation related logistics/air related cargo handling. Given the DAA's own proposals to demolish existing airside cargo handling and replace it with cargo handling across the road (R132) from the airport, there can be no denying the need. The subject lands make infinitely more sense, based on their location to be developed as airside cargo handling, as opposed to requiring expensive bridge access and the use of an already over subscribed road network. The Planning Authority are unjustified in facilitating or supporting the vetoing of airport related cargo handling because the DAA wish to maintain a monopoly at the airport, as this would be contrary to the proper planning and operational efficiency of the airport.

Whether, airside or landside access, the subject site represents an ideal location for air-related cargo handling, and this is what is proposed. While airside access for air related cargo handling is preferred it is not an essential pre-requisite. Given the location and extent of lands zoned DA by the planning authority it would not seem logical or practicable to presume or insist that all DA lands where they are proposed as 'air-related cargo handling' be airside only.

The applicant pending planning permission is not in a position to sign up a future occupant, however, it is understood that it is within the gift of the planning authority

and/or the Commission on appeal, to condition that 'prior to commencement of development' or 'prior to occupation of the units' the applicant shall provide details of the intended user, and demonstrate compliance with the land use objective that the user will operate cargo handling and aviation related logistics.

Reason No.2 states –

> *The proposed development is located proximate to lands west of runway 1 6/34 indicated in the Dublin Airport Local Area Plan as a potential location for a third terminal (T3). The Planning Authority is not satisfied, on the basis of the information submitted that the proposed development would not prejudice the orderly operation and continued growth of the Airport including the provision of a third terminal and the provision of a western access route to Dublin Airport from the N2 corridor. The proposal is considered to be piecemeal and developer led and fails to present a comprehensive and cohesive approach in ensuring sustainable growth at the Airport is safeguarded. The proposed development is contrary to DA01, DA02 of the Fingal Development Plan 2023-2029 and 803, TP03 & EA05 of the Dublin Airport Local Area Plan and would therefore, be premature and contrary to the proper planning and sustainable development of the area.*

A Masterplan has been prepared and submitted to the Planning Authority which provides an indicative layout of the most operationally efficient landuse form, consistent with the available plans for Dublin Airport, and which provide for the optimal location of a new third terminal and much needed new landside surface access (linking the airport with the M2, as an alternative to the dependence on the M1/R132 as the sole vehicular access to the airport).

The Masterplan follows best practise in airport expansion design, and is consistent with the approach followed in airports such as Barcelona, Kuala Lumpur, Munich and Athens, etc.. The pocket of land on which the cargo handling is proposed could not or should not be used for an alternative purpose, and as such its development as a first phase does not in our professional opinion compromise the long-term planning of the development of Dublin Airport.

Trusting that this addresses and responds to the concerns of the Planning Authority, and demonstrates that the proposed development at the location identified represents the optimal land use for the Airport, and does not prejudice the long-term planning of the airport and any future third terminal that would be envisaged.

APPENDIX 1 – International Airports – Photographic Record of Development Form


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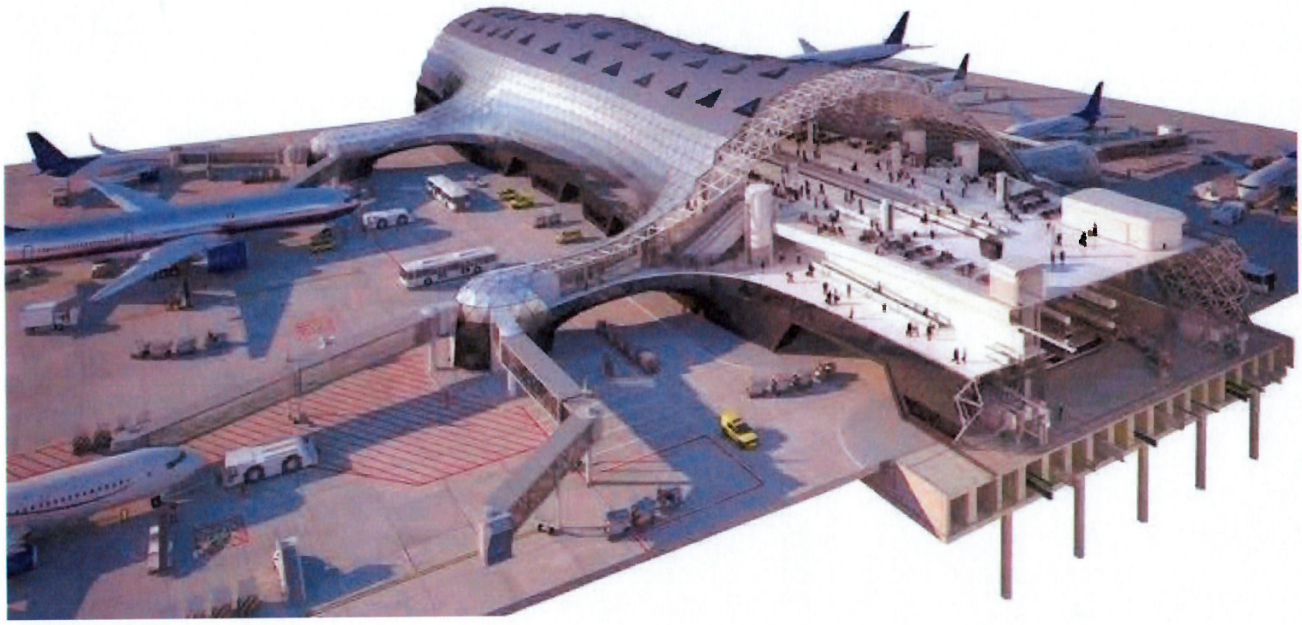


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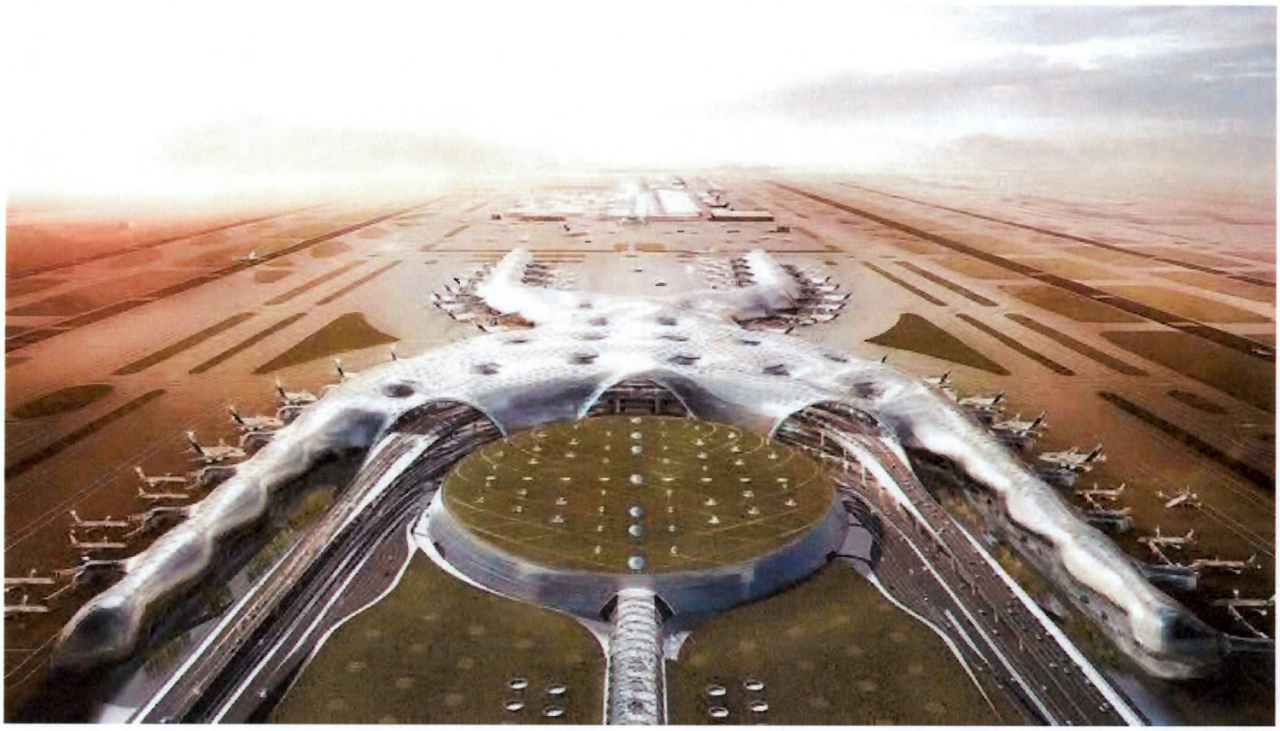
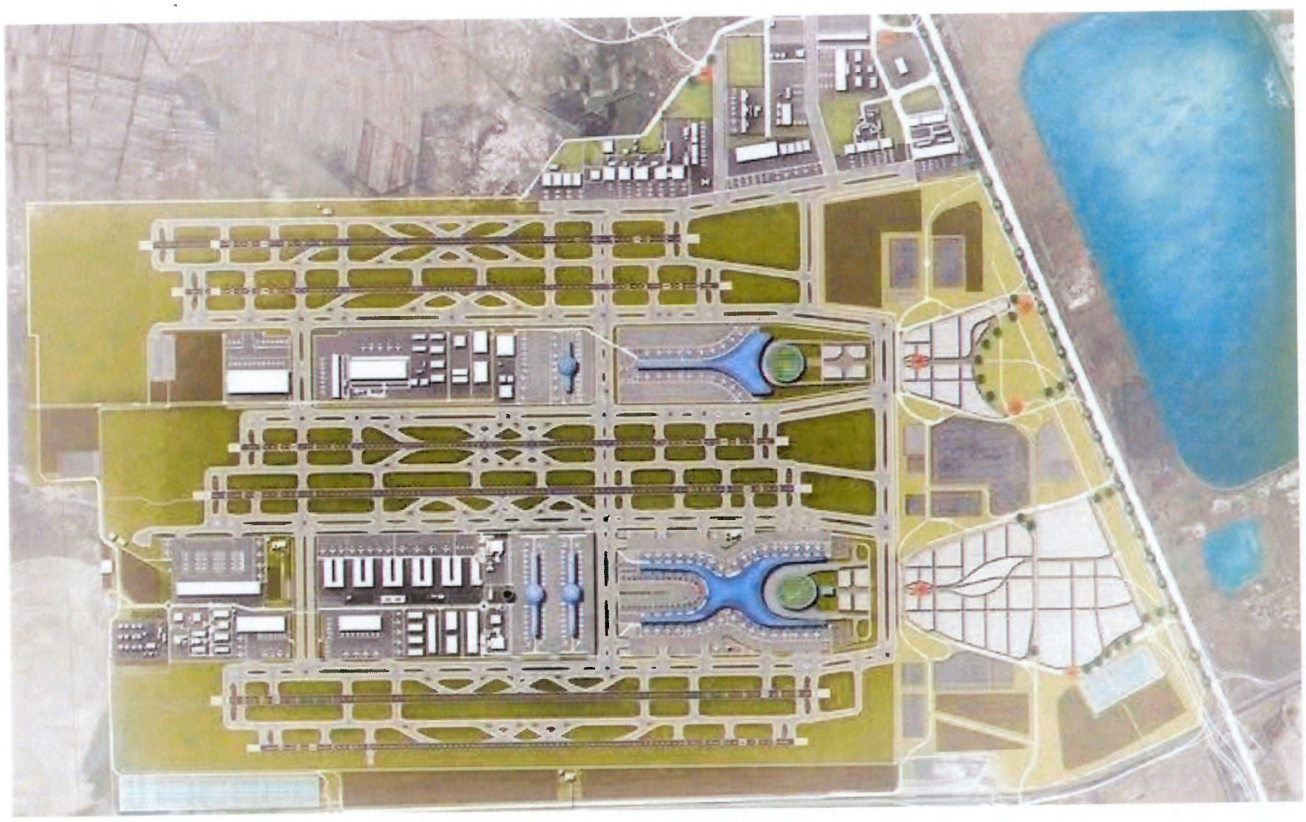
APPENDIX 1 – International Airports – Photographic Record of Development Form



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