Introduction

The daa is pleased to submit comments on the Draft UK-Ireland RP2 performance plan consultation, and recognises the strong commitment of the UK and Ireland to improving the safety and economic performance of the European ATM.

The daa notes that Dublin ranks third in 2013 in the list of UK and Irish airports submitted to the Performance and Charging Regulations, having recently overtaken Manchester. Our primary concern is that there are no ATM, airspace or network constraints on the development of Dublin Airport in the future

Although not in a service provider-customer relationship with the IAA, daa recognises the vital importance of the relationship between the airport as infrastructure provider, the ANSP as "manager of the system", and the airline (pilot) as user. Between these actors, there exist excellent working relationships and collaborative forums, designed to maximise throughput and increase capacity ahead of demand – capacity leading, rather than lagging.

Comments

Safety

Training and culture are vital to support an atmosphere of trust in which individuals and organisations are positively encouraged to report safety related incidents, whilst still understanding the line between acceptable and unacceptable behaviour. The daa welcomes the reiteration of policy, the approach being taken and the KPIs/targets set, and will play its part in ensuring a Just Culture at its airports.

Terminal Navigation Services Ireland/En Route Capacity

The daa would like to see a stated objective of removing the current flow control limit of 15nm longitudinal spacing between successive Dublin Airport departures via LIFFY. The current (longstanding) constraint is, we understand, due to the difficulty of handling the volume of eastbound oceanic traffic – particularly in the mornings – which enter Irish airspace at twelve points but currently exit to the UK via only three.

With the likely implementation of RLatSM in the ICAO NAT region during RP2, it appears to us that the opportunity for bunching of traffic in the NAT region will increase, and unless steps are taken to improve capacity at the UK/IRE FIR boundary, we would be concerned that Dublin Airport's ability to "free flow" departures into and overflying the UK will be compromised further.

The daa is pleased to note that A-CDM at Dublin Airport is in the 2015 work programme for Dublin and will work proactively and in partnership with the IAA and other stakeholders to achieve this.

Flexible Use of Airspace

Allied to the above, it is also important to improve access into military airspace in the UK, which in Dublin Airport's case would allow more use of the DEXEN SID, again alleviating demand via LIFFY, and providing users with more efficient routes, particularly to the London TMA.

daa