



ÚDARÁS EITHEORÉACH NA hÉIREANN
IRISH AVIATION AUTHORITY

Draft Decision on Summer 2027 Coordination Parameters at Dublin Airport

10 September 2026



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1. Executive Summary

- 1.1 The IAA is responsible for declaring coordination parameters at coordinated Irish airports. In this paper we set out our Draft Decision on the Dublin Airport parameters for the Summer 2027 ('S27') season, which runs from 28 March to 30 October 2027 inclusive.¹ The proposed coordination parameters are laid out in Appendix 1.
- 1.2 The Coordination Committee, comprising Dublin Airport², AirNav Ireland, and airlines operating at Dublin Airport, is required under Article 5 of the Slot Regulation (defined below) to provide advice to the IAA on the coordination parameters to be declared in accordance with Article 6. The majority advice is to implement the 'S27 Wishlist 1' hourly runway capacity ('R60') limits, which involves a range of increases in the declared limits in the day hours.
- 1.3 Our Draft Decision on the Summer 2027 runway parameters is to follow the advice of the Coordination Committee through implementing the 'Wishlist 1' hourly runway capacity ('R60') limits, which involves a range of increases in the declared runway limits in the day hours, adds up to 13 departures, 12 arrivals, and increases the total limits by 28 per day. In respect of the parking stand coordination parameters, we propose to maintain the wording of the referral parameter to reflect the continuing trial to reduce the scope of stand referrals. We also update the stand count to reflect expected changes by apron area relative to S26.
- 1.4 With respect to the terminal parameters, we propose to maintain all parameters unchanged relative to S26.
- 1.5 On 3 April 2025, the High Court ordered the IAA not to take account of the 32mppa Conditions (defined below), pending the outcome of underlying judicial reviews of our Winter 2024 and Summer 2025 decisions. As a result, we do not propose to include a seasonal PATM seat capacity limit for the S27 season. This remains in line with our approach for Summer 2026.
- 1.6 In making this proposal, we have relied on a range of evidence, and considered the advice provided by the Coordination Committee. We commissioned fast-time simulation modelling of the airfield to assess a range of scenarios relating to potential increases in the runway limits. This work was carried out by To70. The assessment of these scenarios takes the form of a comparison of a range of airfield metrics. The results from this assessment were shared with the Coordination Committee, and the final report is published alongside this document.
- 1.7 We have considered other evidence with which we have been presented, or which we sought. This evidence includes modelling work conducted by Dublin Airport, and its consultants.
- 1.8 We invite responses to this Draft Decision no later than 5pm, Thursday 24th September. Responses should be sent by email to consultation@iaa.ie.³

¹ As per the worldwide slot calendar: [WASG Calendar](#)

² We use the term 'Dublin Airport' to refer to the regulated entity within daa plc.

³ We may correspond with those who make submission, seeking clarification or explanation of their submissions. Ordinarily we place all submissions received on our website. If a submission contains confidential material, it should be clearly marked as confidential and a redacted version suitable for publication should also be provided. We do not ordinarily edit submissions. Any party making a submission has sole responsibility for its contents and indemnifies us in relation to any loss or damage of whatever nature and howsoever arising suffered by us as a result of publishing or disseminating the information contained within the submission.

2. Background

2.1 Section 8(1) of the Aviation Regulation Act, 2001, as amended, provides that the IAA is the competent authority in Ireland for the purposes of Council Regulation (EEC) No. 95/93, as amended (the 'Slot Regulation'). The IAA is therefore responsible for:

- The designation of the Coordination status of Irish airports.
- Appointing a qualified schedules facilitator or coordinator, as appropriate, at airports which have been designated as Schedules Facilitated or Coordinated.
- The determination of coordination parameters at Coordinated airports in line with Article 6 of the Slot Regulation, taking account of relevant technical, operational and environmental constraints as well as any changes thereto.
- Deciding whether to approve Local Guidelines proposed by the Coordination Committee.

2.2 Dublin Airport is designated as Coordinated by the IAA. Airport Coordination Limited (ACL) is the appointed coordinator.

2.3 Under Article 5 of the Slot Regulation, one of the roles of the Coordination Committee is to advise the IAA on the coordination parameters to be determined in accordance with Article 6. The IAA attends Coordination Committee meetings as an observer.

2.4 Article 6(1) states that the determination of the parameters '*shall be based on an objective analysis of the possibilities of accommodating the air traffic, taking into account the different types of traffic at the airport, the airspace congestion likely to occur during the coordination period and the capacity situation*'. Thus, the determination of the parameters is a forward-looking projection in which we must take account of expected demand, capacity (including airspace capacity), and relevant constraining factors, during the relevant season, in an objective manner. This is primarily assessed through simulations of the operation of a forecast flight schedule at the airport.

2.5 Article 6(3) of the Slot Regulation details the required interaction between the IAA and the Coordination Committee:

'The determination of the parameters and the methodology used as well as any changes thereto shall be discussed in detail within the coordination committee with a view to increasing the capacity and number of slots available for allocation, before a final decision on the parameters for slot allocation is taken. All relevant documents shall be made available on request to interested parties.'

2.6 In that regard, as per previous seasons, when taking account of relevant constraints in issuing a capacity declaration, we tend towards a maximal rather than minimal approach as regards declaring the airport capacity parameters. This is because of the requirement that discussion within the coordination committee is '*with a view to increasing the capacity and number of slots available for allocation*'. This framing of the determination of the parameters is given further weight where a parameter is expected to have a constraining effect on demand, given that Article 6(1) requires the determination to be based on the '*possibilities of accommodating the air traffic*'.

Coordination Committee engagement process

2.7 To help inform the decision on the parameters, we engaged To70 to carry out simulations of the expected flight schedule for S27, using the Fast Time Simulation model of the apron,

airfield, and terminal airspace. This model was originally developed for us in 2017 and has been updated regularly to include changes to infrastructure and operational procedures. It has been used for various simulation exercises since, including the determination of the coordination parameters.

- 2.8 Prior to running the simulations, To70 re-validated the model. This involves simulating the flight schedule on a recent day of operations and comparing the simulated airfield metrics (such as taxi time durations and runway throughput) with actual observed metrics on the same day. If necessary, adjustments are made to the model, and the process is repeated until a satisfactory result is obtained whereby the model is replicating the actual operation with a sufficient degree of accuracy.
- 2.9 Airlines were asked to submit plans for Summer 2027 to ACL. Analysis carried out by ACL indicated that increases in the runway limits would be required to ensure that these plans could be fully facilitated. A number of changes to the hourly runway (R60) limits relative to S26 were proposed by Dublin Airport, informed by the analysis carried out by ACL.⁴

Table 2.1: Dublin Airport S27 Wishlist 1 Proposal for Summer 2027

UTC Hour*	Arrival	Departure	Totals
0600	-	1	3
0700	2	-	2
0800	-	2	3
0900	2	-	2
1000	-	3	2
1200	2	-	2
1300	-	3	2
1400	2	-	2
1500	-	2	4
1600	2	-	2
1700	-	2	2
1800	2	-	2
Total	12	13	28

Source: Coordination Committee

- 2.10 Information provided by airlines was used to develop an anticipated flight schedule on a busy day in Summer 2027, the “S27 Schedule”. The operation of the S27 Schedule was simulated by To70. To assess the effect of a potential decision to adjust the R60 parameters as proposed above, To70 coordinated the S27 Schedule according to both the S27 Wishlist limits, and alternatively the current S26 runway limits. In addition, both scenarios were tested with the North Runway operational from 0600 UTC to 2200 UTC (the current operational practice), and from 0515 UTC to 2300 UTC (the proposed change based on the An Coimisiún Pleanála (ACP)⁵ decision on the North Runway Relevant Action, discussed in more detail in

⁴ All references to times or hours are in UTC 24-hour format, unless stated otherwise. Where a reference is made to a particular hour, such as the 0500z hour, this refers to the time period one hour in length commencing from the stated time. To give an example, the 0500z hour spans from 5 am to 6 am UTC. During the summer season, UTC time is one hour ahead of Local time (indicated with an ‘L’). Hence, the 0500z hour spans from 6am to 7am local time.

In each hour, a requested departure slot must not bust the hourly Departures limit or the hourly Total limit, while a requested arrival slot must also not bust the hourly Arrival limit or the hourly Total limit.

⁵ 314485 | An Coimisiún Pleanála -

Section 3). Comparisons were provided between simulated taxi times, ground delay and runway holding delay. Further details and results of this analysis is set out in Section 3, and the results of the To70 simulations are published alongside this document.

- 2.11 In relation to the passenger terminal (PTB) parameters, Dublin Airport proposed no changes relative to S26 in respect of either the departures or arrivals hourly limits. In both cases, it was identified that the forecast demand can be accommodated within the existing S26 limits, i.e. the PTB limits are not expected to be a constraining factor on the allocation of slots. Dublin Airport also proposed maintaining the S26 US Preclearance passenger processing hourly limit.
- 2.12 Dublin Airport also proposed to maintain the stand referral parameters from S26 for S27, while ACL and Dublin Airport work together on how the remaining referrals can be addressed. Dublin Airport proposed to continue with the referrals and to replace them once a suitable solution has been developed and tested.
- 2.13 No other changes were proposed relative to the Summer 2026 limits, except updating the stand count by apron area to reflect expected changes in the count relative to Summer 2026.
- 2.14 The pre-meeting of the Coordination Committee took place on 11 August 2026. At this meeting, the To70 simulation modelling results were discussed. Dublin Airport also presented various pieces of analysis and modelling results to Committee members, namely:
- An update on airfield performance, On Time Performance (OTP) in Summer 2026 compared to Summer 2025, prospective projects expected to be delivered for Summer 2027, and projects that are expected to be under construction in Summer 2027.
 - Simulation modelling carried out for Dublin Airport by ARUP.
 - An update from ACL.
 - Coordination parameter proposals for Summer 2027.
- 2.15 At the pre-meeting of the Coordination Committee, Dublin Airport provided an update on the Infrastructure Application submitted to Fingal County Council and an update on the enforcement of the 32mppa Conditions (defined and discussed in Section 4):
- On the Infrastructure Application, Dublin Airport stated it did not anticipate a decision from Fingal County Council within 2026, and that any decision may then be appealed to ACP.
 - Dublin Airport updated the Coordination Committee on its Judicial Review challenging an Enforcement Notice issued by Fingal County Council for alleged non-compliance with the 32mppa Conditions. It also updated the Coordination Committee on Judicial Reviews taken in respect of the IAA's decision to implement a seat capacity parameter for W24 and S25, and stated its belief that *'there is no indication that 32m annual passenger condition [sic] will form part of the S27 Coordination Parameters'*.
- 2.16 Dublin Airport also updated the Coordination Committee on the Dublin Airport (Passenger Capacity) Act 2026. In summary:
- On 12 February 2026, the Department of Transport published the General Scheme for the Dublin Airport (Passenger Capacity) Bill 2026, which outlined a mechanism allowing the Minister for Transport to amend or revoke the passenger-cap planning condition following appropriate environmental assessments.
 - On 19 June 2026, the Government published the Dublin Airport (Passenger Capacity) Bill 2026 which proposed to give the Minister the power to amend or revoke the passenger cap, allow daa to apply for such a change, require environmental assessments by ACP before any

ministerial decision, and to restrict the future use of passenger-cap planning conditions at Dublin Airport.

- On 16 July 2026, the Dublin Airport (Passenger Capacity) Act 2026 was signed into law. Dublin Airport updated the Committee that the Act does not automatically remove the passenger cap, but instead allows daa to apply to the Minister and empowers the Minister to amend or revoke the relevant planning condition after considering any necessary environmental assessments.
- Dublin Airport informed the Committee that on 5 August 2026 it submitted an application to the Minister, stating the application will now be assessed by ACP.

2.17 Finally, Dublin Airport provided an update on ACP's Final Decision on conditions relating to the planning permission for the North Runway. In summary, the Final Decision provided for:

- North Runway Operating Hours: Runway 10L/28R shall not be used for take-off or landing between 0000 and 0600 (local time) except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports where Runway 10L/28R length is required for a specific aircraft type.
- Implementation of a night-time noise quota: The Airport shall be subject to a Noise Quota Scheme (NQS) with an annual limit of 16,260 between 2300 and 0700 (local time) with noise-related limits on the aircraft permitted to operate at night.
- Implementation of a night-time movement cap: The airport shall be subject to an annual aircraft movement limit of 35,672 between the nighttime hours of 2300 and 0700 (local time).
- Changes to the noise insulation scheme

2.18 Dublin Airport updated the Committee that ACP notified the European Commission of the proposed operating restrictions on 8 August. On 10 February 2026, the European Commission, with respect to the process for introducing operating restrictions (Regulation (EU) 598/2014 of the European Parliament and of the Council⁶) found that the night movement cap is not in accordance with EU law:

- *"ACP concluded that the annual night movement cap, which constitutes an operating restriction, is necessary to achieve the noise abatement objective considering the Lmax indicator, without any assessment of whether measures from the other three pillars of the balanced approach could have achieved the objective, contrary to Articles 5(3) (a)-(c) of Regulation (EU) 598/2014."*
- *"Ireland shall examine this Decision and inform the Commission of their intentions before introducing those operating restrictions at Dublin Airport."*

2.19 Dublin Airport noted that on foot of the European Commission's assessment, it remains to be seen how ACP intends to proceed.

Coordination Committee vote

2.20 The Coordination Committee met again on 26 August 2026 to finalise its advice for the IAA in respect of S27.

2.21 At this meeting, Dublin Airport stated that following the pre-meet, Aer Lingus had requested two additional Wishlists be modelled to assess their impact on the runway metrics. Aer Lingus stated this was to examine the impact on taxi-out times in the morning hours after first-wave based aircraft departures and noted the additional capacity in Wishlist 1 in the morning hours seemed to be resulting in an increase relative to the S26 results. These

⁶ <https://eur-lex.europa.eu/eli/reg/2014/598/oj/eng>

proposals were distilled into alternative flight schedules for simulation, and labelled as 'Wishlist 2' and 'Wishlist 3':

- No additional growth in the 0600 (UTC) and 0700 (UTC) hours ('Wishlist 2')
- No additional growth in the 0600 (UTC), 0700 (UTC), and 0800 (UTC) hours ('Wishlist 3')

2.22 Simulation modelling results of the two additionally requested Wishlist assessments were presented to the Coordination Committee.

2.23 Clarification was sought by Aer Lingus on the impact of Wishlist 1 on the To70 calibration modelling of taxi-in times in the early morning hours, whereby some spikes of delay were apparent in the actual data relative to the model calibration. To70 clarified this is typically due to an aircraft arriving early which does not happen throughout the day, and so is not representable in the model. Dublin Airport also stated the purpose of the model calibration is to generalise the results, rather than calibrating 100% to any one day which may then include an error such as an aircraft arriving early. It was agreed that in future coordination cycles, when the actual data appears to deviate from the model calibration, Dublin Airport will note which flights in the calibration day arrive early and provide to the Coordination Committee for context.⁷

2.24 Coordination Committee members voted on the proposed parameters. Voting rights for Committee members are set out in the Coordination Committee constitution. A set number of votes are allocated to Dublin Airport and AirNav Ireland, with the rest allocated to airlines based on the number of movements flown at Dublin Airport in the preceding year, meaning that most of the voting weight is held by airlines and, in particular, Ryanair and Aer Lingus. Only those present (online or in person) can vote.

2.25 We note that the voting process is an indicative part of the Coordination Committee's advice to the IAA, rather than the IAA being bound by the result. As part of the process, we seek to take into account all positions set out by Coordination Committee members as well as any associated comments or evidence relevant to the parameter declaration.

2.26 The results of the vote on the proposed R60 limits are set out in Appendix 1. Overall, a majority voted in favour of the Wishlist 1 limits. No change was proposed in respect of the 10-minute runway limits. In summary:

- 91% of the Coordination Committee voted in favour of adopting the Wishlist 1 limits.
- 3% of the Coordination Committee (KLM, Air France, and Norwegian) voted in favour of the Wishlist 3 limits.
- 5% voted in favour of maintaining the S26 limits (Dublin Airport and United Airlines).
- 1% abstained from the vote (Air Transat, SunExpress, and LuxAir), while no member voted in favour of Wishlist 2.

2.27 As no alternative proposals had been received in respect of the terminal and referral parameters, these parameters were not put to a vote.

2.28 Thus, the overall advice of the Coordination Committee is to adopt the S27 Wishlist 1 limits while rolling forward the stand, PTB hourly limits, and the US Preclearance processing hourly limit.

⁷ Subsequent analysis of the model calibration identified two arrival flights with unusually long taxi-in durations between 0430 and 0630, of 18 minutes and 15 minutes respectively.

3. Airfield Coordination Parameters

3.1 This section addresses, in turn:

- Runway parameters
- Stand parameters

3.2 In relation to the runway coordination parameters, we propose to implement Wishlist 1 for the S27 season, as shown in Table 3.1.

Table 3.1: Proposed changes to runway limits for Summer 2027 (Wishlist 1)

UTC Hour*	Arrival	Departure	Totals
0600	-	1	3
0700	2	-	2
0800	-	2	3
0900	2	-	2
1000	-	3	2
1200	2	-	2
1300	-	3	2
1400	2	-	2
1500	-	2	4
1600	2	-	2
1700	-	2	2
1800	2	-	2
Total	12	13	28

Source: Coordination Committee

3.3 We propose to make no changes to the respective R10 limits for dual and single runway operations.

3.4 We propose to retain the stand parameter as a hard constraint, and to maintain the scope of the referral parameter to allow for continuing cooperation between ACL and Dublin Airport to find and develop a suitable solution for its replacement.

Runway Capacity

3.5 In this subsection, we consider runway capacity limits.

To70 airfield modelling

3.6 As described above, To70 first validated the airfield model and then simulated the S27 flight schedule under the following scenarios:

1. North Runway Open from 0600 UTC

- S27 flight schedule coordinated to the proposed S27 Wishlist 1 limits
- S27 flight schedule coordinated to the existing S26 limits

2. North Runway Open from 0515 UTC

- S27 flight schedule coordinated to the proposed S27 Wishlist 1 limits
 - S27 flight schedule coordinated to the existing S26 limits
- 3.7 The model calibration process was based on 5 May 2026, using actual block times. The simulated metrics (taxi out times, runway throughput, counts of aircraft coming on block, off block, lifting off and touching down) show a close match with the actual data both in magnitude and daily profile.
- 3.8 Taxi out time measures the time elapsed from the aircraft coming off blocks until it lifts off. Departure ground delay is the accumulation of all delay experienced in the same period, i.e. all components of taxi-out time other than unimpeded taxi-time. The estimated effect of proposed airfield capacity increases on these metrics is, in our view, the best way to assess the infrastructural and operational capacity of the airfield to deliver a flight schedule.
- 3.9 Efficient towing of aircraft occurs in the model. Taxiway, towing, runway, and runway exit usage restrictions and patterns have been implemented in the model. Given the close match in the model validation outputs, it is our view that no significant airfield capacity affecting element has been omitted from the model. Airfield infrastructure was updated in the model, based on the expected situation during S27 in relation to taxiway closures for works and projects expected to be complete. No changes are assumed in respect of operating procedures for minimum aircraft separations.
- 3.10 In each scenario, for the purposes of properly assessing airfield/runway capacity only, it is presumed that the Summer 2027 schedule of increased demand materialises as expected. We have previously observed a general pattern whereby airlines may accept sub-optimal slots to meet demand for an operation. To capture this trend, our baseline scenario assumes that this redistribution effect occurs, with these new services operating at the nearest available time, given the effective runway limits for that scenario, in the simulation.
- 3.11 The Summer 2027 flight schedule was based on expected S27 demand, but also with sufficient operations to properly test out the proposed R60 capacity increases. It contains a total of 907 flights, with 450 arrivals and 457 departures. The flight schedule included 47 new arrivals and 51 new departures. Most of these movements could be accommodated at the times requested without any changes to the runway limits.
- 3.12 This level of assumed growth means that some of the modelled operations may not materialise in S27, and thus the schedule can be considered as an aggressive growth scenario, with a likelihood that the performance metrics produced by the model may be worse relative to those likely to be observed if growth is weaker. Nonetheless, we consider it important to fully test out the potential impact of a decision to increase the capacity, and that capacity is used. To assess the effect of a decision to implement the S27 Wishlist 1 relative to maintaining the S26 limits, we asked To70 to simulate the S27 Schedule scenario.
- 3.13 Table 3.2 summarises the results of the S27 Wishlist 1 and the S26 limits simulations, with the North Runway operational from 0600 UTC under both scenarios, as provided to the Coordination Committee. Further details are set out in the To70 simulations published alongside this Draft Decision.

Table 3.2: Departure Taxi Out Time under S26 limits and S27 Wishlist 1 Proposal (NR Operational from 0600 UTC)

Time (UTC)	S27 Wishlist Limits	S26 Limits	Difference
Daily average	00:13:20	00:13:15	00:00:05
Peak	00:16:17	00:16:19	00:00:02

Source: To70, Slide 19. Taxi times in hours, minutes and seconds.

Peak times refer to the window with the highest average value. Values are in hours, minutes and seconds.

- 3.14 Relative to maintaining the S26 limits unchanged, the S27 Wishlist 1 proposal is not expected to have a material impact on taxi-out times on average across the day, or on peak taxi-out times, with the North Runway operating from 0600 UTC.
- 3.15 Table 3.3 summarises the results of the S27 Wishlist 1 and the S26 limits simulations, with the North Runway operational from 0515 UTC under both scenarios. Relative to maintaining the S26 limits, there is little difference in average taxi-out times under the S27 Wishlist. However, peak taxi-out times are 00:00:38 higher under the S27 Wishlist compared with maintaining the S26 limits.

Table 3.3: Departure Taxi Out Time under S26 limits and S27 Wishlist 1 Proposal (NR Operational from 0515 UTC)

Time (UTC)	S27 Wishlist Limits	S26 Limits	Difference
Daily average	00:13:38	00:13:24	00:00:14
Peak	00:16:34	00:15:56	00:00:38

Source: To70, Slide 26. Taxi times in hours, minutes and seconds.

Peak times refer to the window with the highest average value. Values are in hours, minutes and seconds.

- 3.16 Ahead of the final Coordination Committee meeting, Wishlist 2 and Wishlist 3 were also simulated with the North Runway operational from 0600 UTC. The results are contained in Slide 31 and 32 of the To70 slides. The results showed no overall material difference relative to Wishlist 1, with only a minor impact on taxi-out and taxi-in durations.
- 3.17 In summary, relative to maintaining the Summer 2026 limits unchanged, all three wishlists are not expected to have a material impact on taxi-out times on average across the day.

Other Modelling

- 3.18 Dublin Airport commissioned ARUP to carry out simulation modelling on its behalf, which was also presented to the Coordination Committee. ARUP was unable to carry out modelling of Wishlist 2 and Wishlist 3 due to the late request. Modelling by ARUP showed similar results to those of To70 for Wishlist 1 but with greater difference in both the daily average and peak taxi-out times with the North Runway operating from 0600 UTC.

Taxi Out times and On Time Performance (OTP) in Summer 2026

- 3.19 At the Coordination Committee pre-meeting, Dublin Airport provided an update on outturn operational performance in Summer 2026 compared to Summer 2025, from April to July inclusive. Both arrival and departure On Time Performance (OTP) remains in line with S25 averages. Overall, departure OTP is at 71% and arrival OTP at 70% for S26 to date.
- 3.20 Delay coded to Aircraft Rotation remains the most significant contributor of delay at Dublin Airport in S26, increasing (to date) by 5 percentage points relative to S25. As we have noted

previously, there are many other factors which influence OTP at Dublin Airport other than those which relate to airport capacity. Delay coded to En Route Air Traffic Flow Management (ATFM), which is related to insufficient air traffic control capacity in the Flight Information Regions (FIRs) of other states, rather than to Dublin Airport capacity, remains the second greatest contributor, and has increased from 13% of all delay, to 15% in S26 thus far.

- 3.21 Across the full day, average taxi-out times to RW 28R have marginally disimproved compared with S25. Average taxi-out times in S26 were 15 mins 07 secs, compared with 15 mins 01 secs in S25 (measured over April – July for both seasons). Average taxi-in times across the whole day for RW 28L have also disimproved, increasing by 29 seconds in S26 relative to S25.
- 3.22 A number of airfield, terminal, and pier projects are expected to be available in whole or in part for the S26 season. These are shown in Table 3.4 below:

Table 3.4: Major projects expected for S27 relative to S26

Airfield	Terminals and Piers
5H Self Maneuvering Stands	T2 PBZ Shuttle Bus Lounge
South Apron Taxi Works	T1 Façade Upgrade
B2 Bi-Directional	Pier 3 Upgrade
P1W Stands	FastTrack T2 Transformation
	T1 and T2 F&B Transformations

Source: Coordination Committee

- 3.23 A number of projects are also expected to be on-site for the S27 season. These are shown in Table 3.5 below:

Table 3.5: Projects Onsite for S27

Airfield	Terminals and Piers
West Apron Underpass	T1 Baggage Reclaim Upgrade
North Apron Airside Support	T2 Early Bag Store
Critical Taxiway South	
Hangar 6 Apron Extension	
Solar PV	

Source: Coordination Committee

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- 3.24 Under the Slot Regulation, the runway parameters are to be reviewed with a view to increasing the capacity and number of slots available for allocation, based on an objective analysis of the possibilities of accommodating the air traffic.
- 3.25 Simulation modelling results of the Wishlist 1 under both the North Runway being operational from 0515z and 0600z are acceptable, with little overall impact or difference with respect to taxi times and delay. This modelling takes account of infrastructural, operational, and environmental constraints. We are therefore satisfied that the modelling results under Wishlist 1 are acceptable and suggest little overall impact relative to maintaining the S26 limits.
- 3.26 We note Aer Lingus' concerns at the Coordination Committee of the difference in the taxi-

out duration between S26 and the S27 Wishlist 1 limits. Under the S27 Wishlist 1 limits, we consider the difference is driven by a number of factors:

- A higher number of movements during hours which are already busy;
- The stand plan, which differs between seasons and can affect how aircraft interact with each other across different parts of the airport.

3.27 We note that the Coordination Committee members voted for one of the four possible scenarios on a discrete basis, with the majority voting for the adoption of the S27 Wishlist 1 limits.

3.28 Given these considerations, we propose to adopt the S27 Wishlist 1 limits as the runway coordination parameters for S27.

3.29 In recent capacity declarations, we have sought to take account of the potential constraining factor represented by Condition 5 of the North Runway planning permission ("C5"), as imposed in 2007. As we have outlined before, this condition is the subject of disagreement and uncertainty both as to its enforceability and, to the extent that it is enforceable, the precise nature and scope of the constraining factor which it represents. C5 therefore gives rise to complex questions of planning law, EU law, and international law, and is currently the subject of High Court proceedings to which the IAA is a notice party. On this basis, in previous capacity decisions we have 'frozen' the R60 parameters in the nighttime hours (2300 – 0700 local), such that the declared runway capacity would remain in line with the pre-existing single (southern) runway capacity, before the North Runway was completed. That is, slots in the relevant hours would continue to be allocated only to the extent that was possible before the North Runway itself was completed.

3.30 On 16 July 2025, ACP published the Relevant Action Decision. The Relevant Action Decision revokes Condition 5 of the North Runway Planning Permission and replaces it with an NQS. A further point of disagreement has now arisen as to whether the revocation of C5 is also now already effective from a planning law perspective.

First Condition:

The existing operating restriction, Condition 5, of the North Runway Planning Permission (FCC Reg. Ref: F04A/1755; ABP Ref: PL06F.217429) reading as:

'On completion of construction of the runway hereby permitted, the average number of night time aircraft movements at the airport shall not exceed 65/night (between 2300 hours and 0700 hours) when measured over the 92 day modelling period as set out in the reply to the further information request received by An Bord Pleanála on the 5th day of March, 2007'

shall be revoked and replaced with an annual noise quota scheme operating restriction as follows:

The Airport shall be subject to a Noise Quota Scheme (NQS) with an annual limit of 16,260 between 23:00 and 07:00 (local time) with noise-related limits on the aircraft permitted to operate at night.

3.31 A number of other conditions are included in the decision, including:

Second Condition:

The existing operating restriction imposed by Condition 3(d) and the exceptions at the end of Condition 3 of the North Runway Parallel Runway Planning Permission (FCC Reg. Ref: F04A/1755; ABP Ref: PL06F.217428) reading:

'3(d). Runway 10L-28R shall not be used for take-off or landing between 2300 hours and 0700 hours except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports.'

shall be amended as follows:

Runway 10L/28R shall not be used for take-off or landing between 00:00 and 06:00 (local time) except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports or where Runway 10L/28R length is required for a specific aircraft type.

Third Condition:

'The airport shall be subject to an annual aircraft movement limit of 35,672 between the nighttime hours of 2300 and 0700 (local time).'

- 3.32 On 8 August, ACP notified the European Commission of the operating restrictions pursuant to Article 8(1) of EU Regulation 598/2014⁸:

'Before introducing an operating restriction, the competent authorities shall give to the Member States, the Commission and the relevant interested parties six months' notice, ending at least two months prior to the determination of the slot coordination parameters as defined in point (m) of Article 2 of Council Regulation (EEC) No 95/93 for the airport concerned for the relevant scheduling period.'

- 3.33 Judicial review proceedings of ACP's Relevant Action Decision have been launched by Ryanair, Aer Lingus, and SMTW Environmental DAC. Those proceedings were adjourned pending the decision of the European Commission as to whether the proposed Operating Restrictions are in compliance with Regulation 598/2014. As noted above, the European Commission has found that the annual movement cap condition was arrived at in a manner which does not comply with that regulation. No adverse findings were made in respect of the other two conditions (i.e. the NQC Operating Restriction, and the North Runway operating hours).
- 3.34 It remains uncertain how ACP intends to move forward following the European Commission's assessment. While no adverse finding was made in respect of the NQC Operating Restriction, ACP has not yet confirmed the introduction of the same ahead of S27, meaning that it is not yet permissible to take account of it as a relevant constraint for the purposes of Article 6 of the Slot Regulation.
- 3.35 The result of this situation is that currently, neither the original C5, nor the replacement NQC scheme, can be reflected in the coordination parameters for S27. As noted previously, this may change, in the event that ACP were to confirm to the European Commission that the NQC scheme is introduced.
- 3.36 In the interim, we note that the Coordination Committee has again proposed that no changes are made to the R60 limits in the night hours relative to those which were in place prior to the completion of the North Runway. This would again mean that no capacity has been added between 2300 and 0700 local time since completion of construction of the North Runway, meaning that the North Runway cannot lead to more flights in this period than were previously possible under the single Runway 28L based capacity declaration. We therefore

⁸ [Regulation - 598/2014 - EN - EUR-Lex](#)

propose to continue to adopt this approach for S27.

Parking Stands

Proposed Stand Parameters

- 3.37 As mentioned above, there were no proposals brought to the Coordination Committee for any change to the stand parameters. However, we understand the trial which was introduced in S26 to investigate whether stand referrals could be eliminated or reduced is to continue for S27. As for S26, we understand the trial will be monitored throughout the season in conjunction with ACL and daa operations.
- 3.38 We agree with the principle of reducing or eliminating referrals insofar as possible, and also agree that this should be done in a planned way such that the replacement coordination parameters are properly tested before taking effect, to ensure that there is no performance degradation in terms of making best use of capacity without excessive scheduling such that stand capacity is overloaded. We therefore propose to maintain the wording of the stand referral parameter within the capacity declaration accordingly as set out in S26. Any removal of, or amendment to the scope of, stand referrals, will be subject to IAA approval/confirmation.
- 3.39 We also propose to update the stand count, as usual, to reflect seasonal changes.

4. Terminal Building Coordination Parameters

- 4.1 We propose to roll forward the S26 rolling hourly Passenger Terminal Buildings (PTB) limits to the S27 season. We also propose to roll forward the US Preclearance hourly passenger processing limit, which replaced the blanket referral parameter in S26. The PTB hourly limits and the US Preclearance hourly passenger limit are shown in Table 4.1.
- 4.2 We also maintain the load factor assumptions of 95% for scheduled services in Terminal 1, 85% in Terminal 2, and 100% for charter services. We maintain the referral parameters in relation to Terminal 2 check-in desks as per the S26 coordination parameter.

Table 4.1: Proposed hourly Terminal and US Preclearance Limits – S27

	Departures Hourly Limit	Arrivals Hourly Limit	Preclearance Hourly Limit
Terminal 1	4,625	3,960	-
Terminal 2	4,200	3,400	1,450

Source: IAA

Proposed Hourly Limits – Dublin Airport

- 4.3 Dublin Airport proposed to roll forward the PTB hourly limits. It was noted that the hourly PTB limits are unlikely to be a materially constraining factor on the allocation of slots in S27, relative to other limits.
- 4.4 Dublin Airport also proposed to roll forward the US Preclearance hourly passenger limit from S26.

Proposed Referral Limits – Dublin Airport

- 4.5 Dublin Airport proposed retaining the referral parameter for Terminal 2 check-in desks 1-28, where demand exceeds 28 desks.

Seasonal Terminal Seat Capacity Constraint

- 4.6 For the W24 season and the S25 season, we put in place a Passenger Air Traffic Movement (PATM) seat capacity coordination parameter to take account of certain planning conditions relating to Terminals 1 and 2 at Dublin Airport. Specifically, Condition 3 of the Terminal 2 planning permission F06A/1248 (PL 06F.220670), from 2007 states that:

'The combined capacity of Terminal 2 as permitted together with Terminal 1 shall not exceed 32 million passengers per annum unless otherwise authorised by a further grant of planning permission.'

- 4.7 Similarly, Condition 2 of a Terminal 1 extension planning permission (06F.223469 & F06A/1843), from 2008, states that:

'The combined capacity of Terminal 1 (including the extension authorised by this grant of permission) and Terminal 2 granted permission under planning register reference number F06A/1248 (An Bord Pleanála appeal reference number PL 06F.220670) shall not exceed 32 million passengers per annum unless otherwise authorised by further grant of planning permission.'

- 4.8 We refer to these conditions collectively as the '32mppa Conditions'. As set out in the W24

and S25 decisions, the IAA considered those conditions to constitute a relevant constraint for the purposes of those decisions. The IAA's conclusion in that regard, and in respect of a number of related points, is disputed by various parties, who have brought a total of six sets of judicial review proceedings in respect of our W24 and S25 decisions.

4.9 On 10 October 2024 we published our Final Decision on S25 which set a seat capacity limit of 25.2 million seats for the Summer 2025 scheduling season. Ryanair, Aer Lingus, and, together, Delta Air Lines, Inc., JetBlue Airways Corporation, United Airlines, Inc., and Air Transport Association of America, Inc. (known as the 'A4A parties') were granted leave on 21 October 2024 to bring their respective proceedings challenging the S25 Decision, in which they also sought a stay on the operation of the seat cap coordination parameter. On 4 November 2024, the High Court granted the stay.

4.10 In December 2024, the High Court then decided to refer three questions to the Court of Justice of the European Union. The three questions referred are:

1. Can a national competent authority undertaking the exercise of determining the parameters for slot allocation at a coordinated airport under Article 6(1) of Regulation 95/93 (as amended) take into account development consents granted by the relevant planning authority under the national planning code in respect of that airport which impose conditions providing inter alia that the "combined capacity" of the airport terminals shall not exceed a certain annual limit of passengers, and in respect of which the stated reason for the imposition of the conditions was "Having regard to the policies and objectives of the Dublin Airport Local Area Plan and the capacity constraints (transportation) at the eastern campus"? Are such conditions a "relevant technical, operational or environmental constraint" within the meaning of Article 6(1)? Do they form part of the objective analysis of the capacity situation at the airport for the purposes of Article 6(1)?
2. If the answer to question 1 is yes, does Article 6(1) of Regulation 95/93, and insofar as relevant Articles 16 and 17 of the Charter of Fundamental Rights of the European Union, permit Member States to make a determination of the parameters for slot allocation at a coordinated airport for a particular scheduling period which results in the non-allocation of some series of slots (or certain components thereof) to which air carriers would otherwise be entitled in accordance with the terms of Article 8(2)?
3. If this arises for consideration strictly as a result of the Court's answers to questions 1 and 2, does the Slot Regulation prohibit Airport Management Bodies within the meaning of the Slot Regulation from taking unilateral action to close the airport for a period of time, for the purpose of preventing the operation of slots which have been allocated by the Airport Coordinator so as to avoid a breach of an annual limit of passengers of the type mentioned in Question 1?

4.11 On 11 February 2025, Ryanair wrote to the parties involved in the W24 and S25 proceedings proposing that, pending the delivery of the CJEU ruling on the questions referred and the determination of the proceedings by the High Court, the IAA should not take account of the 32mppa Conditions in setting coordination parameters. The order ultimately sought by the airlines was as follows:

"That the Respondent shall not, pending the determination of these proceedings and the related High Court proceedings bearing Record Numbers 2024/920JR; 2024/927JR; 2024/928JR; 2024/1296JR and 2024/1299JR (the "Proceedings"), take account of Condition 3 of planning permission F06A/1248 (An Bord Pleanála Reg. Ref. PL06F.220670) or Condition 2 of Planning Permission F06A/1843 (An Bord Pleanála Reg. Ref. PL06f.22346) (the "32mppa Conditions"), for the purposes of setting coordination parameters or otherwise in respect of the Respondent's functions performed under Council Regulation (EEC) No 95/93 of 18 January 1993 on common rules for allocation of slots at Community Airports, as amended."

- 4.12 Following a hearing before the High Court on 28 March 2025, on 2 April 2025 the High Court delivered judgement, finding:

"In the premises, I intend to grant an interlocutory injunction pursuant to Order 84, rule 20(8)(b) of the Rules of the Superior Courts in the terms sought by the airlines. That order will remain in place pending the determination of these proceedings by the High Court. I will provide that the parties will have liberty to apply to amend vary or discharge that order on 72 hours' notice in the event of any material change in circumstances."

- 4.13 As a result of the High Court's granting of the order in the terms set out above, the IAA has not taken account of the 32mppa Conditions in this Draft Decision, and consequently does not propose to include a seasonal seat cap coordination parameter for S27.

Draft Decision on Terminal Coordination Parameters

- 4.14 We propose to roll forward the S26 departure and arrival PTB hourly limits for both Terminal 1 and Terminal 2. We note there was no objection or alternative proposal from the Coordination Committee. We also propose to roll forward the US Preclearance hourly passenger processing limit for the S27 season.
- 4.15 We propose to retain the referral parameter for Terminal 2 check-in desks 1-28, where demand exceeds 28 desks.
- 4.16 As outlined above, the IAA is enjoined from taking account of the 32mppa Conditions, whether by imposing a seasonal seat cap coordination parameter or otherwise.
- 4.17 In summary, we therefore propose the following with respect to the PTB parameters:
- We propose to roll the Terminal 1 and Terminal 2 PTB arrival and departure hourly limits forward from S26.
 - We propose to roll forward the US Preclearance hourly passenger processing limit in line with the Dublin Airport proposal.
 - We propose to retain the referral parameter for Terminal 2 check-in desks 1-28, where demand exceeds 28 desks.

5. Appendix 1: Draft Summer 2027 Coordination Parameters

The Irish Aviation Authority proposes the following scheduling limits for the Summer 2027 season at Dublin Airport.

Runway Scheduling Parameters:

Runway Hourly Limits			
Time UTC	Arrival Limit	Departure Limit	Total Limit
0000	23	25	32
0100	23	25	32
0200	23	25	32
0300	23	25	32
0400	23	25	32
0500	23	36	40
0600	22	41	57
0700	30	25	50
0800	29	28	53
0900	29	30	56
1000	30	30	56
1100	30	30	57
1200	30	30	59
1300	28	33	58
1400	25	32	54
1500	26	29	51
1600	30	29	56
1700	26	32	57
1800	25	26	50
1900	26	23	46
2000	27	22	46
2100	34	25	45
2200	28	25	32
2300	23	25	32
Totals	636	676	1115

Maximum number of movements per 10-minute period (0600-2159)

Maximum Total	13
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Maximum Arrivals	6
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Maximum Departures	7
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Maximum number of movements per 10-minute period (2200z – 0559z)

Maximum Total	9
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Maximum Arrivals	6
------------------	---

Maximum Departures	6*
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*Exception: Maximum Departure Limit is 7 movements at 0500, 0510, 0520, 0530, 0540, 0550 UTC

Passenger Terminal Parameters (hourly):

	Departures Hourly Limit	Arrivals Hourly Limit	US Preclearance Processing Hourly Limit
Terminal 1	4,625	3,960	-
Terminal 2	4,200	3,400	1,450

Notes:

- The hourly limit for passengers is rolled every 10-minutes.
- Load factors of 95% are applied to Scheduled services for Terminal 1.
- Load factors of 85% are applied to Scheduled services for Terminal 2.
- Load factors of 90% are applied to Scheduled services for CBP.
- Load factors of 100% are applied for Chartered services for both Terminal 1 and Terminal 2.

Stand Parameters:

	GA	Non-Turnaround		Turnaround Stands									All
	W.A.N	W.A.S	Total	5G	5H	Triangle	MRO	P1	P2	P3	P4	S.A	Total
Remote	8	14	22	15	12	4	6	3	-	-	-	-	62
Contact	-	-	-	-	-	-	-	22	9	11	19	9	70
All	8	14	22	15	12	4	6	25	9	11	19	9	132

Note: The table represents NBE stand capacity

Area	Constraint
Stands	Where demand for stands exceeds supply based on coordination allocation, flights to be referred to Dublin Airport for detailed assessment insofar as necessary pending the progress of the trial to reduce the scope of such referrals.

Referral Parameters:

Area	Flag
T2 Check-in Desks 1-28 (T2 Operators excluding EI)	Demand exceeding 28 desks

6. Appendix 2: Coordination Committee Vote

Voting Outcome

Committee Member	Wishlist 1	Wishlist 2	Wishlist 3	S26	Abstain
Dublin Airport	-	-	-	40	-
Air Canada	4	-	-	-	-
Transavia France	3	-	-	-	-
Delta Airlines	11	-	-	-	-
Emerald Airlines	108	-	-	-	-
British Airways	17	-	-	-	-
BA City Flyer	15	-	-	-	-
Air Transat	-	-	-	-	1
UPS Airlines	6	-	-	-	-
United Airlines	-	-	-	12	-
SAS	10	-	-	-	-
Swiss	7	-	-	-	-
KLM	-	-	15	-	-
Lufthansa	18	-	-	-	-
SunExpress	-	-	-	-	3
Aer Lingus	260	-	-	-	-
Iberia Express	4	-	-	-	-
Fedex	7	-	-	-	-

Emirates	7	-	-	-	-
Ryanair	438	-	-	-	-
Luxair	-	-	-	-	2
Air France	-	-	10	-	-
Norwegian	-	-	2	-	-
Result	915	0	27	52	6
%	91%	0%	3%	5%	1%

Source: Coordination Committee.