Submission on the Draft Decision on Summer 2027 Coordination Parameters at Dublin Airport

Prepared on behalf of the five McDonnell family households
[redacted]

Submitted to the Irish Aviation Authority | 24 September 2026

PRIMARY REQUEST
Retain the Summer 2026 runway coordination parameters for Summer 2027 and do not adopt Wishlist 1 at this stage. Before a further increment of scheduled capacity is added, the small number of households bearing the greatest environmental burden should have access to a fair and effective voluntary acquisition solution informed by compulsory-purchase principles and capable, where a household elects to relocate, of delivering reasonably equivalent reinstatement in practice.

Executive Summary

The McDonnell family recognises Dublin Airport's critical national, economic and strategic importance. We do not oppose the airport, national infrastructure or future development. Our concern is sequencing, proportionality and fairness: declared runway capacity should not be increased as though runway throughput were the only relevant constraint while live environmental-mitigation and surface-access processes concerning the same airport remain unresolved.

The IAA proposes to implement “Wishlist 1” for Summer 2027, allowing up to 13 additional departures and 12 additional arrivals and increasing the total declared runway limits by 28 movements per day. The supporting To70 modelling uses a 907-flight busy-day schedule containing 98 new movements. The IAA records that most of those new movements could already be accommodated at their requested times without changing the existing runway limits and that Wishlist 1 is not expected to have a material effect on average taxi-out performance. The modelling also tests North Runway availability from 05:15 UTC as well as 06:00 UTC. (IAA Draft Decision, 10 September 2026; To70 Summer 2027 Final Assessment.)

Since the family's earlier draft was prepared, FOI and AIE disclosures have materially sharpened the evidence. They now show that: (i) Condition 10 has been treated by FCC/WSP as requiring a two-yearly re-evaluation of impacts and mitigation; (ii) the 2025 daa report nevertheless characterises the VDPS exercise principally through noise contours, eligibility and scheme progress; (iii) a new Condition 10 submission, C37/10, is under assessment; (iv) a planning-enforcement investigation remains open; (v) the parallel Passenger Capacity Act environmental process is still incomplete; and (vi) current surface-access work expressly links IAA slot scheduling to peak landside transport capacity and continues to plan improved western access through the N2/Cherryhound/St Margaret's corridor.

The family does not ask the IAA to determine planning compliance, ANCA functions, compensation or property valuation. The submission asks the IAA, within its own Article 6 capacity analysis, to give transparent weight to relevant environmental and infrastructure constraints and to avoid adding capacity first while the effectiveness and intended outcome of the residential mitigation remain live and unresolved.

1. Summer 2027: operational capacity is not the whole capacity question

Article 6 of the EU Slot Regulation requires an objective analysis of the possibilities of accommodating air traffic, taking account of the airport's capacity situation and relevant technical, operational and environmental constraints. The IAA Draft Decision itself recognises that relevant constraints form part of that analysis and records the live CJEU questions concerning whether transportation planning conditions can constitute relevant technical, operational or environmental constraints for Article 6 purposes.

The present modelling is detailed on airfield operations: taxi-out and taxi-in time, runway throughput, ground delay, towing, runway holding and aircraft movements on and off blocks. Those are legitimate operational-capacity metrics. They are not, however, a receptor-level assessment of the corresponding aircraft-noise burden, early-morning disturbance or the ability of the wider surface-access system to absorb additional activity.

That distinction matters because the IAA's own modelling does not demonstrate a compelling operational necessity for Wishlist 1. The 907-flight S27 schedule includes 47 new arrivals and 51 new departures; the Draft Decision states that most can be accommodated at requested times without changing the existing runway limits. With the North Runway available from 06:00 UTC, the change in modelled taxi performance is marginal and the IAA concludes that Wishlist 1 is

not expected to materially affect average taxi-out time. This supports a cautious, staged approach while significant external constraints remain unresolved.

2. The original North Runway balance: residual harm, mitigation and continuing review

The original planning record is directly relevant to why residential mitigation is not a peripheral property issue. An Bord Pleanála's independent specialist noise adviser, Rupert Thornely-Taylor OBE, concluded that significant residual aircraft-noise effects would remain despite the mitigation then proposed. On aircraft-noise grounds alone, absent counterbalancing non-noise advantages, he considered that the development should be refused.

His recommended acquisition condition was more protective than an ordinary market sale: he recommended voluntary purchase “on the valuation basis that the dwellings were subject to compulsory purchase”. He also recommended continuing review of eligible dwellings and required aircraft ground activities, including taxiing, stationary engine running and auxiliary power units, to be included in the relevant noise determination. The Board's final Condition 9 did not reproduce the compulsory-purchase wording verbatim, but it did require a voluntary purchase scheme in the interest of residential amenity.

Condition 10 then required the results of noise and flight-track monitoring to be used to re-evaluate noise impacts and the application of mitigation measures, expressly including the property buy-out scheme, on a two-yearly basis. Its stated reason was to protect the amenities of the area and ensure ongoing monitoring and verification of the proposed noise mitigation measures. The family submits that this wording is consistent with an adaptive mitigation framework: real operating evidence is not merely to redraw contours, but to inform the continuing application of the mitigation that protects affected homes.

3. The latest Condition 10 evidence: the issue is now one of interpretation and effectiveness

The latest FCC records allow the issue to be stated more precisely. The family is not asserting that the VDPS was ignored. It was reviewed. The question is what that review tested, and therefore how “re-evaluate noise impacts and the application of mitigation measures” has been interpreted.

3.1 2024 submission and 2025 revision

FCC has confirmed that daa's 2024 Condition 10 submission, F04A/1755/C32/10, was not accepted as compliant. A revised submission, F04A/1755/C33/10, was made in September 2025 and subsequently accepted after technical review by WSP. WSP summarised Condition 10 as containing four elements, the fourth being a “biannual re-evaluation of impacts and mitigation using noise and track monitoring data”. (WSP Technical Memorandum, 7 October 2025.)

The actual 2025 daa Condition 10 report is revealing. Its VDPS review focuses on the 69 dB LAeq16h contour, homes brought into the contour, forecast contours, invitations to join the scheme, completed purchases, conveyancing and valuations. It then concludes that the “progress and review of the VDPS should satisfy” the part of Condition 10 concerning the application of voluntary dwelling purchase offers as a mitigation measure. The report's own compliance table marks the two-yearly re-evaluation of impacts and mitigation, including purchase schemes, as “Complied”. (daa Condition 10 Compliance Report 2024/2025 Revision 2, sections 6.5 and 8.)

That establishes a real review of eligibility and administration. What the released material has not yet demonstrated is an outcome-based test of whether the terms of the VDPS continue to function as effective mitigation for the households already within the scheme: for example, whether an affected household that elects to move can secure reasonably equivalent replacement accommodation without material financial detriment, whether the structure of the scheme creates barriers to completed relocation, or whether the acquisition mechanism actually achieves the residential-amenity purpose for which it exists.

This distinction is particularly important because the 2025 report is expressly described as a re-issue of the 2024 review and states that it remains based on 2023 operations and noise contours, although some later scheme data were added. The question for the present submission is therefore not whether FCC made a compliance decision - it did - but whether formal compliance and demonstrated mitigation effectiveness are necessarily the same thing.

3.2 Jurisdiction is clear; the interpretive question remains live

ANCA has confirmed to the family that it does not determine Condition 10 planning compliance; that function lies with daa and the FCC Planning Authority. The family accepts that distinction and does not ask the IAA to determine the planning condition either. The significance for this consultation is that the environmental protection framework on which intensified runway use depends is still being interpreted and re-evaluated while the IAA is considering another capacity increment.

A fresh Condition 10 compliance submission, F04A/1755/C37/10, was lodged on 24 August 2026 and is currently under assessment. Separately, Planning Enforcement has confirmed that Enforcement File 23/043B remains open, that a warning letter has issued and that investigations are ongoing. A warning letter is not a final finding of breach, and the

family does not present it as one. Together, however, these processes confirm that the adequacy and application of the mitigation framework are live regulatory matters, not settled historic issues.

4. The original 2016 VDPS rationale is itself still being established

A further AIE request sought the 2004-2016 records showing how the VDPS was actually designed and approved: drafts, correspondence, professional advice, the rationale for market value plus a 30% premium, the consideration of Rupert Thornely-Taylor's recommendations, changes made during engagement and the FCC assessment by which the final scheme was approved. FCC's 23 September 2026 decision identified only seven planning/ABP decision records and did not identify an obvious 2016 development-and-approval trail. An internal review has been lodged.

That evidential gap matters because the appropriate benchmark for a later Condition 10 re-evaluation should be informed by the environmental outcome the scheme was originally intended to achieve. If the original design record establishes that the scheme was intended to enable effective relocation from a severe noise environment, that purpose is relevant when assessing whether a later review limited substantially to contours, eligibility and administrative progress is sufficient.

5. Parallel passenger-capacity environmental assessment is still incomplete

The IAA Draft Decision records that daa applied to the Minister on 5 August 2026 under the Dublin Airport (Passenger Capacity) Act 2026 and that the application is subject to a separate environmental assessment process. Since the Draft Decision was issued, the Department of Transport has identified 13 records responsive to the family's AIE request, including daa's 139-page application, Ministerial consultation letters and responses from ACP, FCC, NTA, TII and the IAA. Access was refused at this stage on the basis that the environmental/deliberative process remains ongoing and the information is intended to be published through the statutory process; an internal review is pending.

The family does not ask the IAA to prejudge that process. The narrower point is sequencing: at the date of this consultation, another statutory process addressing airport capacity is still completing its environmental assessment and has not yet placed the underlying environmental record before the public. That is an additional reason to avoid treating an increase in declared runway capacity as a purely operational step detached from the wider environmental framework.

6. Surface access: slot scheduling and landside capacity are expressly linked

The NTA and TII records are particularly relevant because they concern current transport planning, not only historic proposals. In its January 2024 submission on F23A/0781, the NTA supported a formal review point at 36 million passengers per annum, with FCC, NTA and TII involvement and a pause before further passenger growth until growth towards 40 million could be shown to be accommodated from a surface-access and mode-share perspective. In March 2025 the NTA again emphasised the scale of additional bus capacity required and the need to finalise the Interim Surface Access Strategy, monitoring thresholds, associated actions and inter-agency governance.

TII material contains an even more direct link to the present consultation. Under the Dublin Airport Interim Surface Access Strategy, Action 15 calls for engagement with the IAA regarding the scheduling of flight-slot allocations with consideration to peak periods for landside transport capacity. The same action programme requires a multi-agency phased infrastructure/services programme aligned to planned airport growth. These are direct statements that slot scheduling and landside transport capacity are not wholly separate questions.

The same official work identifies “Improved western access to airport campus” as a planning principle. A related 2024 surface-access presentation identifies a new full western access route from the N2 via Cherryhound Interchange and a new link through to St Margaret's, together with a relocated western Park & Ride and potential to complement future airport growth beyond 40mppa. No final route alignment is asserted here, and the family does not contend that any particular McDonnell property is presently required for a road scheme. The relevance is strategic continuity: the same area bearing the direct North Runway noise burden continues to sit within active planning for the airport's western surface-access resilience.

7. Early-morning and ground activity reinforce the need for caution

The S27 assessment models North Runway availability from 05:15 UTC as well as 06:00 UTC because of the operational advantages of earlier runway availability. The modelling captures ground operations in detail, including taxi time and runway holding. Yet the original independent noise advice expressly required ground activities - including taxiing, stationary engine running and auxiliary power units - to be included when determining residential noise for the acquisition scheme.

The same ground movements that appear as efficiency variables in an airfield model are environmental events for nearby households. The IAA need not duplicate ANCA's functions, but its final decision should identify how the environmental consequences of intensified and earlier airfield utilisation have been taken into account when deciding whether the additional declared capacity is appropriate.

8. Requests to the IAA

1. Retain the existing Summer 2026 runway coordination parameters for Summer 2027 and do not adopt Wishlist 1 at this stage.

2. In the Final Decision, identify expressly the relevant technical, operational, environmental and infrastructure constraints considered in the Article 6 capacity analysis, including the live Condition 10 process, the open enforcement investigation, the ongoing Passenger Capacity Act environmental assessment and the current surface-access/monitoring framework.

3. Give appropriate weight to the unresolved interpretive and substantive mitigation issue: whether the two-yearly re-evaluation of the VDPS is sufficient when it demonstrates contours, eligibility and scheme progress, but does not yet demonstrate whether the acquisition mechanism enables effective relocation and restoration of residential amenity in practice.

4. Recognise, without determining compensation terms, that a proportionate long-term solution for the small number of most severely affected households should be genuinely voluntary and informed by compulsory-purchase principles, capable of reasonably equivalent reinstatement and, where applicable, reasonable disturbance, professional/relocation and severance/injurious-affection costs.

5. Take account of the current NTA/TII evidence that airport growth and slot scheduling interact with landside capacity, including the 2024 action expressly calling for IAA engagement on slot allocation having regard to peak landside transport capacity.

6. If the IAA nevertheless decides to increase Summer 2027 capacity, explain why a staged or deferred approach was rejected and how the Authority satisfied itself that the increase is appropriate notwithstanding the unresolved mitigation, environmental-assessment and surface-access processes described above.

Conclusion

The latest evidence has narrowed rather than broadened the family's case. It is no longer necessary to suggest that the VDPS was not reviewed: the 2025 records show that it was. The live issue is what “re-evaluate noise impacts and the application of mitigation measures” requires, and whether a review centred on contours, eligibility and administrative progress is enough to demonstrate that a residential acquisition measure remains effective mitigation in practice.

At the same time, C37/10 is under assessment, enforcement remains open, the historical rationale for the 2016 VDPS is under AIE internal review, the Passenger Capacity Act environmental assessment is incomplete, and the current surface-access programme expressly links slot scheduling with peak landside capacity. None of those matters substitutes for the IAA's statutory test; together they show why “available capacity” should not be equated solely with the number of aircraft the runway system can physically process.

The family accepts the national importance of Dublin Airport and does not seek to prevent its continued development. We ask for sequencing and proportionality: before another increment of scheduled capacity is added, the small number of established households carrying the greatest environmental burden should have the benefit of a mitigation framework whose intended outcome and practical effectiveness are clear.

For those reasons, the McDonnell family respectfully requests that the IAA retain the existing Summer 2026 runway limits for Summer 2027 and not adopt Wishlist 1 at this stage.

Key documents relied upon

- Irish Aviation Authority, Draft Decision on Summer 2027 Coordination Parameters at Dublin Airport, 10 September 2026; To70 Aviation Consultants, Summer 2027 Final Assessment.
- Rupert Thornely-Taylor OBE, Report on Issues Relating to Noise, An Bord Pleanála Ref. PL06F.217429, 4 June 2007; North Runway planning permission F04A/1755 / PL06F.217429, including Conditions 9 and 10.
- daa, Voluntary Dwelling Purchase Scheme, December 2016; related process and SCSI dispute-resolution material.
- daa, Condition 10 Compliance Report - Noise and Flight Track Monitoring, Mitigation, and Noise Insulation, 2024/2025 Revision 2, September 2025.
- WSP, DAA North Runway Planning Consent - Condition 10 Compliance Submission Review, 7 October 2025.
- Fingal County Council FOI/2026/225; AIE/2026/046; AIE/2026/048; AIE/2026/047; and associated Condition 10 / VDPS records and decisions.
- Fingal County Council Planning Enforcement correspondence, September 2026, File 23/043B.
- National Transport Authority AIE A2026-0009; Transport Infrastructure Ireland FOI/1377/26, including Dublin Airport Interim Surface Access Strategy and 2024 surface-access material.
- Department of Transport AIE-2026-020 decision and schedule, 22 September 2026 (internal review pending).
- McDonnell Family submission to ANCA, September 2026, and ANCA correspondence clarifying the division between ANCA and FCC Planning compliance functions.

Submitted on behalf of the McDonnell family households
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