

Date: 26/09/2024

From: William Dempsey

Subject: Draft Decision on Summer 2025 Coordination Parameters at Dublin Airport

Document Reference: [s25-draft-decision_final.pdf \(iaa.ie\)](#)

Dear Sir, Madam,

I wish to submit an observation on the 'Draft Decision on Summer 2025 Coordination Parameters at Dublin Airport' report recently published.

1.0 Passenger Capacity Limit.

On the basis that the IAA is correctly taking into account the 32mppa Conditions in the determination of the parameters for slot allocation as a 'relevant constraint'

The DAA have recently made several press statements in which they advised that they will be exceeding the planning capacity limit of 32M passengers for 2024. Throughout 2024 passenger numbers have been approximately 5% greater in each month of 2024 than in the corresponding month of 2023.

In 2023 the DAA had 33.26M passengers which exceeded the planning capacity limit. In 2024 the DAA will exceed the 2023 passenger number with a slot assignment of an additional 25 slot in total per table 2.1 for summer 2024 and total hourly limit of 1032.

Based on the above passenger numbers not meeting planning conditions the slot assignment per table 2.1 for summer 2025 should be reduced from 28 to below 25 additional slots and total hourly limit of 1062 reduced to below 1032 in order to stay within planning capacity limits.

2. CSO Figures to be used:

Fingal County Council have stated that, based on decisions by An Bord Pleanála, that the CSO figures, which adhere to the International Aviation Convention on counting passengers, should be used for planning and enforcement purposes. The IAA's draft decision does not use the CSO's figures and instead uses figures modified by the DAA to remove transit passengers and half of transfer passengers, contrary to the International Aviation Convention.

The CSO states in their aviation statistics that Transit passengers are included and are counted twice (i.e. both as arriving and departing passengers).

Eurostat states Transfer of indirect transit passengers arriving and departing on a different aircraft within 24 hours, or on the same aircraft bearing different flight numbers. They are counted twice: once upon arrival and once on departure. The aviation statistics requirements are covered under EU regulations and law see link:

[<https://ec.europa.eu/eurostat/cache/metadata/en/avia_pa_esms.htm>](https://ec.europa.eu/eurostat/cache/metadata/en/avia_pa_esms.htm)

The IAA's S25 plan should use the CSO's figures rather than figures modified by the DAA to remove transit passengers, contrary to the International Aviation Convention.

3. Night-time Flights:

On the basis that the IAA is correctly taking into account planning conditions in the determination of the parameters for slot allocation as a 'relevant constraint'

The hourly runway schedules should be amended to reflect the recent Relevant Action decision by An Bord Pleanála. The summer 2025 schedule should include an annual aircraft movement limit of 13,000 between the nighttime hours of 23:00 and 06:59 (inclusive local time) with aircraft movements split between winter (3,900) and summer (9,100). Separate seasonal tables should be provided within the summer 2025 decision to clearly show the allowable limits at nighttime during summer and winter.

4. Flightpath:

The IAA are fully aware of the noise situation as a result of divergent flight paths from the North Runway. This is causing huge distress to tens of thousands of people. The public note and appreciate the recent efforts by IAA to control the annual passenger cap and to help keep the airport compliant with planning conditions. We note the IAA's role also has an environmental element and that the IAA should not have approved the north runway flightpaths which are currently in use. These flightpaths shower noise on over 30,000 people. No public consultation was ever sought for these flight paths. The original straight-out flightpaths would improve the noise situation enormously.