

Final Decision on Summer 2024 Coordination Parameters at Dublin Airport

3 October 2023

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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 Final Decision on the Dublin Airport parameters for the Summer 2024 ('S24') season, which runs from 31 March to 26 October 2024 inclusive.¹ The applicable coordination parameters are laid out in the Appendix.
- 1.2 We have made the following changes relative the Summer 2023 ('S23') parameters:
 - Other than in the 0700z hour, implement the 'Scenario C' hourly runway capacity ('R60') limits, which involves a range of increases in the declared runway limits in the day hours. In the 0700z hour, implement 'Scenario B'.
 - Stand counts are updated to reflect any expected changes by apron area relative to Summer 2023. Otherwise, the form of this parameter is unchanged from S23.
- 1.3 The Final Decision remains in line with the proposals in the Draft Decision.
- 1.4 Other parameters are unchanged relative to S23.
- 1.5 We have relied on a range of evidence. 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 Egis. 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.
- 1.6 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.
- 1.7 We received 88 representations in response to the Draft Decision, most of which relate to the question of potential Noise Related Operating Restrictions at the airport. These views, as well as our responses, are summarised in this report.
- 1.8 Other than in respect of providing for the T-Coding² of certain slots which could otherwise be allocated within the coordination parameters, our Final Decision continues to follow the advice received from the Coordination Committee. The Coordination Committee comprises Dublin Airport, AirNav Ireland (the Air Navigation Service Provider), and is open to all airlines operating at Dublin Airport.

¹ As per the worldwide slot calendar: https://www.iata.org/contentassets/4ede2aabfcc14a55919e468054d714fe/calendar-coordination-activities.pdf

² T-Coding refers to the allocation of Slots subject to a condition or conditions.

2. Background

Legislation

- 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 S24 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'.

2.7 Subsequent sections of this paper detail how these requirements were met by the IAA.

Coordination Committee Engagement Process

- 2.8 To help inform the decision on the parameters, we engaged Egis to carry out simulations of the expected flight schedule for S24, using the Fast Time Simulation model of the apron, airfield, and airspace in the Dublin Airport TMA (Terminal Manoeuvring Area). This model was originally developed for us by Egis 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 capacity parameters.
- 2.9 Prior to running the simulations, Egis 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.
- 2.10 Airlines were asked to submit growth plans for Summer 2024 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.
- 2.11 A number of changes to the hourly runway (R60) limits relative to S23 were proposed, informed by the analysis carried out by ACL, but reduced in scope.³ This set of changes, summarised in Table 2.1, has been termed 'Scenario A' by the Coordination Committee. There was no proposal for any changes in runway capacity in the hours not listed in Table 2.1.

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³ 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. 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 Totals limit, while a requested arrival slot must not bust the hourly Arrivals limit or the hourly Totals limit.

Table 2.1: 'Scenario A' Proposal for Summer 2024

UTC Hour*	Departures	Arrivals	Totals
0600	+2		+4
0800		+2	+3
0900	+2	+2	+4
1000		+2	+4
1100	+2	+1	+1
1200	+2		+1
1300		+1	+2
1400	+2		+2
1500	+2		
1700	+1	+3	+4
2100		+1	
Total	+13	+12	+25

Source: Coordination Committee

- 2.12 Information provided by airlines was used to develop an anticipated flight schedule on a busy day in Summer 2024, 'the S24 Schedule'. The operation of the S24 Schedule was simulated by Egis. To assess the effect of a potential decision to adjust the R60 parameters as proposed above, Egis coordinated the S24 Schedule according to both the Scenario A limits, and alternatively the current S23 runway limits. Comparisons were provided between simulated taxi times, ground delay and runway holding delay. Further detail and results of this analysis is set out in Section 3, and the results of the Egis simulations are published alongside this document.
- 2.13 In relation to the passenger terminal (PTB) parameters, it was proposed to make no changes relative to S23 in respect of either the departures or arrivals limits. It was noted that, as the current C3 security screening equipment trial is ongoing, the departure parameters should not be modified until the true benefits of this new technology can be identified. Thus, no material changes in respect of arrivals capacity were proposed. In both cases, it was identified that the forecast demand can be accommodated within the existing S23 limits, i.e. the PTB limits are not expected to be a constraining factor on the allocation of slots.
- 2.14 No other changes were proposed relative to the Summer 2023 limits, except updating the stand count to reflect minor expected changes in the count relative to Summer 2023.
- 2.15 The pre-meeting of the Coordination Committee took place on 16 August 2023. Ahead of the initial meeting, the Egis simulation modelling results were circulated. Dublin Airport also provided various pieces of analysis and modelling results to Committee members ahead of the initial meeting, namely:
 - An update on airfield performance, On Time Performance (OTP) in Summer 2023 compared to Summer 2022, prospective projects expected to be delivered for Summer 2024, projects that are expected to be under

- construction in Summer 2024.
- Simulation modelling carried out by Dublin Airport, and for Dublin Airport by ARUP.
- An update from ACL.
- Coordination parameter proposals for Summer 2024.
- 2.16 At the pre-meeting, there were a number of suggestions for the release of additional capacity relative to Scenario A, and/or releasing less capacity than proposed. The proposals were distilled into two additional flight schedules for simulation, as shown in Table 2.2:
 - Scenario B included additional capacity in the 0600z, 0700z, and 2100z hours.
 - Scenario C included the scenario B capacity (with a variation between Departures and Totals in 0700z), as well as significant additional capacity in the 1900z, 2000z, and 2100z hours.

Table 2.2: Summer 2024 Scenario B and C proposals

	Scenario B				Scenario C				
UTC Hour*	Departures	Arrivals	Totals	Departures	Arrivals	Totals			
0600	+3		+6	+3		+6			
0700			+4	+2		+2			
0800		+2	+3		+2	+3			
0900	+2	+2	+4	+2	+2	+4			
1000		+2	+4		+2	+4			
1100	+2	+1	+1	+2	+1	+1			
1200	+2		+1	+2		+1			
1300		+1	+2		+1	+2			
1400	+2		+2	+2		+2			
1500	+2			+2					
1700	+1	+3	+4	+1	+3	+4			
1900					+2	+2			
2000					+2	+2			
2100		+2			+3	+2			
Total	+14	+13	+31	+16	+18	+35			

Source: Coordination Committee

2.17 The Coordination Committee met again on 24 August to finalise its advice for the IAA in respect of S24.

Coordination Committee Vote

2.18 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 (the Air Navigation Services Provider at Dublin Airport), with the rest allocated to airlines based on the number of movements flown at Dublin Airport in the preceding year. Only those present (online or in person) can vote. We note that the voting process is an indicative part of the Coordination Committee's advice to the IAA, rather than constituting an "election" of the parameters. 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.

- 2.19 The votes on the proposed R60 limits are set out in the appendix. There was a range of views:
 - Dublin Airport and AirNav Ireland abstained, as did DHL.
 - Most airlines supported different scenarios in different hours, with all four possibilities (i.e. Scenarios A, B, C, and retaining the existing S23 parameter) receiving some support.
- 2.20 Overall, the vote was in favour of Scenario C in all hours with the exception of the 0700z hour, in which the vote was in favour of Scenario B. No specific reasons were provided.
- 2.21 No changes were proposed within the Committee in relation to any hour other than those listed above. No change was proposed in respect of the 10 minute runway limits. No other changes to airfield limits were proposed, other than updating the stand counts within the stand parameter to reflect changes in these counts, as usual.
- 2.22 The Committee did not formally vote on the other parameters, however no changes to the terminal limits were proposed. In light of uncertainty over Condition 5 of the North Runway Planning Permission, the airline members all voted in favour of 'T-coding' any new slots allocated between 2200z and 0600z.
- 2.23 Thus, overall, the advice of the Coordination Committee is to implement Scenario C, except for the 0700z hour in which it recommends Scenario B, update the stand counts, provide for the 'T-coding' of certain new slots, and otherwise make no changes to the parameters.

3. Airfield Coordination Parameters

- 3.1 This section addresses, in turn:
 - Runway parameters
 - Stand parameters
- 3.2 In line with the majority advice from the Coordination Committee, we have decided to implement Scenario C other than in the 0700z hour in which we implement Scenario B, as set out in Table 3.1.

Table 3.1: Changes to runway limits from Summer 2023

UTC Hour	Departures	Arrivals	Totals
0600	+3		+6
0700			+4
0800		+2	+3
0900	+2	+2	+4
1000		+2	+4
1100	+2	+1	+1
1200	+2		+1
1300		+1	+2
1400	+2		+2
1500	+2		
1700	+1	+3	+4
1900		+2	+2
2000		+2	+2
2100		+3	+2
Total	+14	+18	+37

Source: IAA

- 3.3 We make no changes to the respective R10 limits for dual and single runway operations.
- 3.4 We retain the stand parameter as a hard constraint. Where demand for stands exceeds supply as per the count in the appendix, movements are referred to Dublin Airport for detailed assessment.
- 3.5 We do not include a provision for the T-coding of any new slots which, but for the existence of Condition 5 of the North Runway Planning Permission, would otherwise be allocated in line with these parameters.

Runway Capacity

3.6 In this subsection, we consider runway capacity limits.

Egis Airfield Modelling

- 3.7 As described above, Egis first validated the airfield model and then simulated the S24 flight schedule under the following scenarios:
 - Rolling forward the S23 R60 limits, i.e. making no changes to the limits compared to those in place for S23.
 - Implementing the Scenario A adjustments to the S23 limits.
 - Implementing the Scenario B adjustments to the S23 limits.
 - Implementing the Scenario C adjustments to the S23 limits.
- 3.8 The model validation process was based on 5 April 2023, using actual block times. On this day, 100% of operations were westerly.
- 3.9 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. Across the day, the difference between the average simulated and average actual taxi out time is 18 seconds, with the simulation generating slightly higher taxi times than were observed in reality.
- 3.10 Taxi out time measures the time elapsed from the aircraft coming off blocks until it crosses the runway stopbar to begin its take-off roll. 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.
- 3.11 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.
- 3.12 Airfield infrastructure was updated in the model, based on the expected situation during S24 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.
- 3.13 In each scenario, it is presumed that the Summer 2024 schedule of increased demand materialises as expected. We have previously observed a general pattern whereby airlines may accept sub-optimal slots (whether in relation to timing, series fragmentation, or both) in order to meet demand for an operation. In order 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.
- 3.14 The Summer 2024 flight schedule was based on expected S24 demand, but

also with sufficient operations to properly test out the proposed R60 capacity increases. It contains a total of 857 flights, of which 91 are new operations. Most of these movements could be accommodated at the times requested without any changes to the runway limits.

- 3.15 This level of assumed growth means that some of the modelled operations may not materialise in S24, 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 test out the potential impact of a decision to increase the capacity. To assess the effect of a decision to implement the respective scenarios relative to maintaining the S23 limits, we asked Egis to simulate the S24 Schedule coordinated according to all four of these scenarios. All scenarios also conform to the existing R10 limits.
- 3.16 Table 3.2 summarises the results of the S24 Wishlist and S23 limits scenario simulations, overall and in terms of local averages across various parts of the day, as provided to the Coordination Committee. Further details are set out in the Egis simulations published alongside.

Table 3.2: Departure Taxi Out Time under S23 limits and Scenario A

Time (UTC)	Scenario A	S23 limits scenario	Difference
Average (0430-0830)	00:16:42	00:16:30	+00:00:12
Average (0830-1100)	00:13:18	00:13:06	+00:00:12
Average (1100-1730)	00:15:54	00:15:36	+00:00:18
Average (2000-2130)	00:12:48	00:12:48	00:00:00
Daily average	00:12:45	00:13:00	-00:00:15
Peak	00:22:12	00:21:24	00:00:48

Source: Egis, Slide 21. 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.

- 3.17 Ahead of the final Coordination Committee meeting, scenarios B and C were also simulated, with the results shown from slide 27 of the Egis slides. These showed no material difference with Scenario A, other than a slight further increase of the peak taxi-out time to 00:22:48 in both cases, linked to extra movements in the 0600z and 0700z hours.
- 3.18 In summary, relative to maintaining the Summer 2023 limits unchanged, none of the scenarios A, B, or C are expected to have a material impact on taxi-out times on average across the day. As shown above, that is consistent across most of the local averages, with the exception of the peak taxi-out time during first wave departures. That increases by 48 seconds to 00:22:12 under scenario A, and further to 00:22:48 under scenarios B and C.

Other Modelling

3.19 Dublin Airport commissioned ARUP to carry out simulation modelling on its

behalf, which was also presented to the Coordination Committee. Dublin Airport also presented the results of its own modelling. These models, especially the ARUP model, display similar results to Egis as regards daily average taxi-out times, and the daily profile.

3.20 We consider that this provides a useful cross-check and cross-validation of the simulation modelling exercises.

Taxi Out times and On Time Performance (OTP) in Summer 2023

- 3.21 At the Coordination Committee pre-meeting, Dublin Airport provided an update on outturn operational performance in Summer 2023 compared to Summer 2022, from April to July inclusive.
- 3.22 As we suggested in the S23 decision, On Time Performance (OTP) to the end of July has significantly improved in S23 compared to S22, albeit from a very low base. The improvement is driven by June and July performance. As we have noted previously, there are many factors which influence OTP at Dublin Airport other than those which relate to airport capacity. Delay coded to Aircraft Rotation and En Route Air Traffic Flow Management (ATFM), which are not specifically linked to Dublin Airport capacity, remain the most significant contributors.
- 3.23 Across the full day, average taxi-out times to RW 28 are in line with S22. In S22, the North Runway (28R) was not yet operational during the comparison window. In S23, it was operational from 0800z until July, and then from 0600z (7am local) in July. We note that taxi-out times by apron area reflect this year-on-year change, with taxi-out times from areas nearer to RW 28R having fallen significantly, and those on the southern part of the airfield having risen significantly. Average taxi-in times are also in line with S22; conversely, these have relatively improved on the southern part of the airfield compared to the northern part.
- 3.24 Average first wave taxi-out times (with the North Runway not yet operational for the first wave, other than from 0600z from July) have been 1.5 minutes higher than in 2022.

Draft Decision

- 3.25 Under the Slot Regulation, we are required to review the parameters 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. In the Draft Decision, we proposed to amend the hourly runway limits in accordance with Scenario C with the exception of the 0700z hour for which we propose Scenario B, for the following reasons:
 - The amended parameters provide for increased capacity to accommodate the expected or potential air traffic demand.
 - The evidence from the simulations, which take account of infrastructural,

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⁴ Summer 2023 Final Decision, paragraph 3.26.

- operational, and environmental constraints, suggests that the additional capacity proposed can be accommodated by the parallel runway system without any material causative impact on delay.
- 3.26 We noted that this aligns with the advice of the Committee. We agreed with the Coordination Committee that Scenario C best aligns with the expected demand, with the exception of the 0700z hour in which Scenario B does.
- 3.27 As with the Summer 2023 declaration, we agreed that it is prudent to limit the initial North Runway capacity release to preclude potentially excessive bunching of the schedule, as the relevant operational stakeholders become accustomed to the North Runway now being operational from 0600z. We also noted that further additional capacity is not likely required to accommodate the air traffic.
- 3.28 We noted that Condition 5 gives rise to complex questions of planning law, EU law, and international law, and it is not for the IAA to make a determination, nor is it possible for it to attempt to predict a likely determination, on this matter, with any sufficient degree of certainty or foreknowledge. Pending any such determination, we do not know whether Condition 5 is a constraining factor on traffic at Dublin Airport for the relevant scheduling season, and to the extent that it is, we do not know what the precise nature of the constraint is, such that we could give effect to it in the capacity parameters.
- 3.29 On that basis, we proposed to continue to freeze the R60 parameters in the referenced night 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 We noted that since our last capacity decision, on 28 July 2023, an Enforcement Notice was issued by Fingal County Council (FCC) to daa in respect of Condition 5. On 8 August, daa sought, and was granted, leave to apply for judicial review in respect of the Enforcement Notice on a range of grounds, including many of the issues raised by the respondents to the S23 capacity decision. The IAA is a Notice Party to the proceedings. daa also sought, and was granted, a stay on the operation of the Enforcement Notice pending the determination of those proceedings. Fingal County Council was granted liberty to apply to the court, on 48 hours notice to daa, to have the stay lifted or varied.
- 3.31 In light of the Enforcement Notice, we noted that the airline members of the Coordination Committee supported the T-coding of any new slots/re-times within the hours 2200z to 0600z, with Dublin Airport and Air Nav Ireland abstaining. We have previously considered that approach and said that we do not believe it is appropriate for S24. We proposed to continue taking the approach that we have taken in the last number of seasons, in essentially freezing the approach to night capacity as described above.
- 3.32 We said that, in order to reflect it in a capacity declaration, we would first need

a decision on what precisely the condition lawfully requires and when precisely it requires it. Any other approach risks pre-emptively giving particular weight to a constraint by taking a view of its meaning and effect in particular circumstances, where that might differ from that ultimately deemed to be represented by the condition, or giving particular weight to a constraint which might be deemed unenforceable or to not fall to be enforced in S24.

3.33 Thus, we proposed to continue the approach taken in the above decisions.

Comments received in response to the Draft Decision

- 3.34 Consistent with the views it expressed in response to the Winter and Summer 2023 declarations, Aer Lingus argues that the real benefits of the North Runway will only be realised once the supporting infrastructure and resources are in place. It is therefore surprised that the IAA proposes an enhanced capacity declaration, particularly in the morning departure wave. It notes that it will only support capacity increases when there is evidence that the resources are in place.
- 3.35 Aer Lingus notes AirNav Ireland's abstention from voting and argues that AirNav Ireland's presentation to the Coordination Committee illustrated that on only 6 occasions over the 2-month sample period (27 June to 24 August 2023), did departures exceeded 35/hour in the peak 0600z hour with a maximum of 38/hour achieved on one signal day. Its states that AirNav commented that it was fortunate to achieve this level and that achieving that output is far from the norm. It questions why the IAA did not take this into account when making its Draft Decision.
- 3.36 Aer Lingus further argues that declaring capacity at this level will increase delays for all departing flights. It also expresses concerns with the accuracy of the modelling underpinning the proposed capacity declarations, stating that for summer 2023 Egis incorrectly projected the peak departure taxi times in the 0600z hour. It notes that the Summer 2024 morning peak is now projected at almost 23 minutes, an increase of almost 30% since Summer 2022 despite the new runway's introduction. It argues that this demonstrates that the supporting infrastructure is not yet in place to support this level of morning movement growth. It asks that the IAA re-evaluate its declaration for Summer 2024 considering the above information.
- 3.37 Aer Lingus notes the IAA's comments regarding Condition 5 and expresses general agreement with the IAA continuing the approach adopted in previous decisions. However, it does not accept that any application of Condition 5 could result in Aer Lingus being unable to operate certain allocated slots.
- 3.38 Dublin Airport notes that the Draft Decision addresses the potential impact of Condition 5 on the declaration of capacity at the Airport. It also notes that since the Draft Decision was issued, FCC has filed and served its opposition papers with regards to daa Judicial Review of its Enforcement Notice and that it has exhibited the Planning Report dated 18th July 2023 which underpins its decision to issue the Enforcement Notice. The Airport remains of the view that it has a good basis to challenge the Enforcement Notice. However, pending the

resolution of the proceedings, it requests that the IAA take account of this report before making its Final Decision. It again states that the Summer 2024 coordination parameters should be consistent with an 'appropriate interpretation' of the terms of the North Runway Planning Permission and Condition 5.

- 3.39 The IAA has received over 80 further responses from individuals who, we understand, are generally residents living in the vicinity the airport, on the Draft Decision. These responses are generally consistent with those provided to us ahead of previous seasons, primarily related to the following topics: Condition 5 of the North Runway Planning Permission, Condition 3 of the Terminal 2 Planning Permission, and the health impacts of aviation noise and emissions on local residents. These views are summarised below.
- 3.40 The residents suggest that the IAA has failed to take account of the constraints represented by Condition 3(d) and Condition 5. It is argued that these are Operating Restrictions within the meaning of Regulation 598/2014 and that planning permission is required to amend them, which has not been granted.
- 3.41 Liam O'Grádaigh states that under SI No. 645 of 2003, daa is responsible for notifying interested parties and the IAA of operating restrictions and that the IAA is responsible for notifying the Minister, EU Commission and Member States. He asks whether the IAA has been notified by daa in line with Section 11 of that SI, and then whether the IAA has, in turn, yet notified the European Commission and the other EU Member States.
- 3.42 It is noted by residents that complaints have been made to FCC alleging breaches of Planning Permission relating to both Condition 5 as well as to other conditions such as relating to insulation schemes. Respondents have also pointed out that the Enforcement Notice against Dublin Airport may be successful and that this would, it is said, force Dublin Airport to restrict operations to 65 flights per night.
- 3.43 Regarding health concerns, several respondents have noted that their personal health and wellbeing has been negatively impacted by aircraft noise. Multiple respondents have also argued that the health and wellbeing of as many as 50,000 people are being impacted by aircraft noise. Respondents have referred the IAA to the HSE submission to the ANCA public consultation which notes the importance of Condition 3(d) and Condition 5 in protecting public health and the need to ensure that all significantly impacted people have an opportunity for mitigation. It is stated that the IAA does not have the expertise or legal remit to interpret these conditions.
- 3.44 Sheelagh Morris states that the conditions of the North Runway planning permission were set to give local residents protection from aircraft noise and harmful aircraft emissions and calls on the IAA to adhere to them. She refers to the HSEs submission on daa's planning application F20A/0668 which states that the Conditions were imperative for the health of the communities impacted. Sheelagh Morris has also requested an explanation of T-Coding which is referred to in the Draft Decision.

Final Decision

- 3.45 We have further considered the comments from Aer Lingus in respect of the capacity in the day hours. We note that the views of other airlines, and other Coordination Committee members, have already been accounted for within the majority advice from the Coordination Committee, which advice we proposed to follow.
- 3.46 We are not persuaded to change our Draft Decision in respect of the day hours. We do not see that there is evidence to suggest that declaring the parameters in line with the Coordination Committee advice is likely to materially increase taxi-out times, relative to declaring the parameters in line with Aer Lingus' views. We did take into account the comments of AirNav Ireland, Aer Lingus, and other parties. We note that it is not expected that the number of movements scheduled in the peak hour of departures off Runway 28R would necessarily or ordinarily depart within the same hour, i.e. a degree of departure queueing is expected in the peak departures hour. It is a matter for AirNav Ireland as to how it votes and what reasons it might or might not provide in relation to its vote, or provide any further response to our Draft Decision.
- 3.47 In respect of the accuracy of the modelling underpinning the S23 capacity declaration, we note that the 21 minute peak Aer Lingus appears to be referring to is the <u>Summer 2024</u> schedule operating under the S23 limits. This is a 'control' scenario on slide 21, intended to show what is likely to happen in S24 if no changes are made to the limits. It is not the S23 flight schedule.
- 3.48 As presented by Dublin Airport at the Coordination Committee pre-meeting, the actual average first wave taxi-out time from April to July 2023 was 18 minutes, which was 1.5 minutes (9%) higher than 2022. This was linked to the North Runway not being operational for first wave until July 4th. The simulation modelling for S23 was based on dual runway operations from 0700 local time, and in that context the estimated first wave taxi-out time was 16.5 minutes.
- 3.49 We note the comments of Dublin Airport, Aer Lingus, and residents in respect of the potential capacity impact of Operating Restrictions deriving from the North Runway and/or T2 planning permissions. We note that Aer Lingus does not accept that Condition 5 could lead to it being unable to operate certain slots, whereas on the other hand residents believe that Condition 5 should be interpreted to imply a nightly limit of 65 movements.
- 3.50 As we set out in our S23 and W23 capacity decisions, and as recognised by some respondents, it is not for the IAA to determine the status of disputed, unclear and/or unnotified Operating Restrictions which apparently pose complex questions of planning, EU, and International law. Nor is for us to consider the merits or otherwise of such Operating Restrictions, such as in relation to health impacts or otherwise. Instead, it is for the IAA to follow such a determination which would provide clarity on these points, following Dublin Airport's legal challenge to the Enforcement Notice in respect of Condition 5 or otherwise. As a Notice Party, the IAA has reviewed the respective positions of FCC and Dublin Airport, as suggested by Dublin Airport. We understand Dublin Airport's response to the Draft Decision to be consistent with the position it has

taken to date, including within those proceedings.

- 3.51 In response to Liam O'Grádaigh, the IAA did not receive notification from daa pursuant to SI No. 645 of 2003, before that SI was repealed in 2019. Consequently, it did not carry out an assessment of these Operating Restrictions, nor notify them to the European Commission. Since 2019, notification requirements in relation to Operating Restrictions, including to the European Commission, are no longer a matter for the IAA as they are now governed by Regulation (EU) No 598/2014 and the Aircraft Noise (Dublin Airport) Regulation Act 2019.
- 3.52 We agree with the views put forward that it is important to consider plans for a scenario in which any additional Operating Restrictions are determined to be effective and should fall to be enforced in the scheduling season and in a manner which requires a reduction in operations. Such a scenario might lead to a requirement to amend the capacity declaration, and/or a result that air carriers may not be able to use certain allocated slots for the reason contemplated at Article 10.4(b) of the Slot Regulation, namely 'interruption of air services due to action intended to affect these services which makes it practically and/or technically impossible for the air carrier to carry out operations as planned'.
- 3.53 Finally, in response to Sheelagh Morris, we note that T-Coding is where slots are allocated subject to a condition or conditions.
- 3.54 We have thus determined to continue the approach taken in recent capacity Decisions. We do so while again highlighting that it is important for stakeholders to be aware that it is possible that Condition 5 might be determined to be enforceable and to fall to be enforced in the S24 scheduling season, and in a manner which requires a reduction in operations in S24.
- 3.55 Thus, consistent with each capacity declaration since S22, no changes are made to the R60 limits in the night hours which were in place prior to completion of the North Runway. This again means that no dual runway capacity has been added between 2300 and 0700 local, meaning that the North Runway cannot lead to more flights in this period than were previously possible under the single Runway 28 based declaration.
- 3.56 Consequently, our Final Decision on the S24 runway parameters remains in line with our Draft Decision and in line with the advice of the Coordination Committee.

Parking Stands

3.57 In the Draft Decision, we proposed to retain the hard constraint on stands, while updating the stand count to take account of any changes to stand availability in the various apron areas. Dublin Airport proposed maintaining the current parameter while updating the count, as usual, to reflect seasonal changes. There was no objection or alternative proposal made within the Coordination Committee.

3.58 No respondent made any representation in respect of the stand parameter. We confirm our proposal from the Draft Decision.

4. Terminal Building Coordination Parameters

- 4.1 As proposed in the Draft Decision, we have decided to roll forward the S23 rolling hourly Passenger Terminal Buildings (PTB) limits, which are set out in Table 4.1, to the S24 season.
- 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 and US Preclearance as per the S23 capacity.

Table 4.1: Final hourly Terminal Limits - S24

	Departures	Arrivals
Terminal 1	4,130	3,960
Terminal 2	3,600	3,400

Source: IAA

Proposed Hourly Limits - Dublin Airport

- 4.3 Dublin Airport proposed to roll forward the PTB hourly limits. It was noted that the PTB limits are unlikely to be a constraining factor on the allocation of slots in S24.
- 4.4 There were no objections to this proposal.

Proposed Referral Limits – Dublin Airport

- 4.5 Dublin Airport proposed retaining the referral parameter for Terminal 2 checkin desks 1-28 (Terminal 2 operators excluding Aer Lingus) where demand exceeds 28 desks. It also recommended retaining the referral for US Preclearance, which applies to any new flights, or time changes to pre-existing flights, intending to use this facility.
- 4.6 There were no objections or alternative proposals in relation to these limits.

Final Decision on Terminal Capacity Parameters

4.7 We note the proposal to retain the capacity parameters unchanged, to which there was no objection (Aer Lingus notes its supports for maintaining the current limits). We do not see any reason to amend these parameters and have decided to roll them forward to S24 unchanged.

5. Appendix: Summer 2024 Coordination Parameters

The Irish Aviation Authority has determined the following scheduling limits for the Summer 2024 season at Dublin Airport.

Runway Scheduling Parameters:

Runway Hourly Limits						
Time UTC	Arrivals	Departures	Total			
	Limit	Limit	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	20	40	52			
0700	25	25	45			
0800	27	25	48			
0900	27	26	52			
1000	29	27	52			
1100	30	30	52			
1200	24	29	50			
1300	28	26	52			
1400	23	29	49			
1500	26	27	47			
1600	27	29	52			
1700	26	28	51			
1800	23	26	43			
1900	25	22	41			
2000	27	22	40			
2100	33	25	44			
2200	28	25	32			
2300	23	25	32			
Totals	<u>609</u>	<u>647</u>	<u>1034</u>			

Maximum number of movements per 10 minute					
period- Dual runway operations					
Maximum Total 13					
Maximum Arrivals	6				
Maximum Departures	7				

Maximum number of movements per 10 minute				
period- Single runway o	perations (2200z-0559z)			
Maximum Total	9			
Maximum Arrivals	6			
Maximum Departures 6*				
*Exception: Maximum Departure Limit is 7				
movements at 0500, 0510, 0520, 0530, 0540,				
0550 UTC				

Passenger Terminal Parameters:

	Departures	Arrivals
	Hourly Limit	Hourly Limit
Terminal 1	4,130	3,960
Terminal 2	3,600	3,400

Notes:

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

Stand Parameters:

	GA	No	n-				Turna	aroun	d Stan	ds			All
		Turnaround											
	W.A.N	W.A.S	Total	5G	MRO	P1	P2	Р3	P4	S.A	Triangle	Total	Total
Contact						23	11	11	21	9		75	75
Remote	8	16	24	15	6	3					4	28	52
All	8	16	24	15	6	26	11	11	21	9	4	103	127

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.

Referral Parameters:

Area	Flag
T2 Check-in Desks 1-28 (T2 Operators excluding EI)	Demand exceeds 28 desks
US Preclearance	New flights and schedule changes

Table A2: Coordination Committee Voting Summary

Member	Votes	0600	0700	0800	0900	1000	1100	1200	1300	1400	1500	1600	1700	1900	2000	2100
Aer Lingus	294	S23	Sc A													
AirNav Ireland	20	Abs														
British Airways	21	S23	S23	S23	S23	S23	S23	Sc A	S23							
British Airways CF	17	S23	S23	S23	S23	S23	S23	Sc A	S23							
Dublin Airport	40	Abs														
DHL	0	Abs														
Emerald	66	Sc A														
KLM	18	Sc C														
Ryanair	494	Sc C	Sc B	Sc C												
Swiss	9	S23	S23	Sc C	S23	S23	S23									
TUI	6	Sc B	Sc B	Abs	S23	S23	S23									
UPS	10	Sc B														
Result		Sc C	Sc B	Sc C												
% of total votes		51%	51%	52%	52%	52%	52%	52%	52%	52%	52%	52%	52%	51%	51%	51%