

Final Decision on Winter 2023 Coordination Parameters at Dublin Airport

4 May 2023

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1. Executive Summary

- 1.1 As noted in the Draft Decision published on 14 April, the Air Navigation and Transport Act 2022 provides for the dissolution of the Commission for Aviation Regulation and the transfer of its functions to the Irish Aviation Authority (IAA), on a dissolution day to be determined by the Minister. As anticipated in the Draft Decision, dissolution day took place on 30 April 2023.
- 1.2 Consequently, the Economic Regulation Division of the IAA is now 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 Winter 2023 ('W23') season, which runs from 29 October 2023 to 30 March 2024 inclusive.¹ The applicable coordination parameters are laid out in the Appendix.
- 1.3 Our Final Decision is in line with our Draft Decision. Specifically, we make the following changes relative the Winter 2022 ('W22') parameters:
 - Implement the 'W23 Wishlist' hourly runway capacity ('R60') limits, which involves a range of increases in the declared runway limits in the day hours.
 - Update the within-hour 10 minute ('R10') runway limits to reflect dual parallel runway operations, in line with the S23 declaration.
 - Stand counts are updated to reflect any expected changes by apron area relative to Winter 2022. Otherwise, the form of this parameter is unchanged from W22.
- 1.4 Other parameters are unchanged relative to W22.
- 1.5 We have examined and 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 Our decision follows the advice received from the Coordination Committee. The Coordination Committee comprises Dublin Airport, AirNav Ireland (the Air Navigation Services Provider), and is open to all airlines operating at Dublin Airport. We received three responses to the Draft Decision, which are published alongside this paper and considered within the relevant sections.

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

2. Background

Legislation

- 2.1 Section 8(1) of the Aviation Regulation Act, 2001, states that the Commission for Aviation Regulation (CAR) is the competent authority in Ireland for the purposes of Council Regulation (EEC) No. 95/93, as amended ("the Slot Regulation"). The Air Navigation and Transport Act, 2022, provides for the transfer of this function to the IAA. 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 W23 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, we consider that in taking account of relevant constraints when

issuing a capacity declaration, we ought to 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 should be 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 W23, 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 used for various simulation exercises since, both in relation to the determination of coordination parameters and also to assess the likely impact of airfield projects proposed by Dublin Airport as part of the Airport Charges determination process.
- 2.9 Prior to running the W23 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 Winter 2023 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 Dublin Airport proposed a number of changes to the hourly runway (R60) limits relative to W22, informed by the analysis carried out by ACL, but reduced in scope.² This set of changes, summarised in Table 2.1, is termed the W23 Wishlist. There was no proposal for any changes in runway capacity in the hours not listed in Table 2.1.
- 2.12 Dublin Airport noted the following in relation to its proposal:
 - With the North Runway available, the primary capacity constraint shifts from runway to stands/gates. Proposed additional aircraft movements

² 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 winter season, UTC time aligns with 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.

must fit on available stands, which is also necessary to enable modelling of the flight schedule through the full airfield and thus properly test the impact of potential runway limits.

- As the North Runway operations continue to bed in, it is prudent not to increase capacity by more than c10% in the busiest hours.

UTC Hour*	Departures	Arrivals	Totals
0700	+4		+6
0800	+1		+1
1000	+1	+2	+2
1100	+2		+2
1200		+2	+3
1300	+1	+1	+2
1400	+1	+1	+2
1700	+1	+2	+2
1800	+1	+2	+3
1900	+1	+1	+2
2200		+3	+3
Total	+13	+14	+28

Table 2.1: Wishlist Proposal for Winter 2023

Source: Coordination Committee

- 2.13 Information provided by airlines was used to develop an anticipated flight schedule on a busy day in Winter 2023, 'the W23 Schedule'. The operation of the W23 Schedule was simulated by Egis. To isolate the effect of a potential decision to adjust the R60 parameters as proposed above, we asked Egis to coordinate the W23 Schedule according to both the proposed Winter 2023 Wishlist limits, and alternatively the current Winter 2022 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.
- 2.14 In relation to the passenger terminal (PTB) parameters, Dublin Airport proposed to make no changes relative to W22 in respect of either the departures or arrivals limits. It 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. It did not identify any material changes in respect of arrivals capacity. In both cases, it identified that the Wishlist demand can be accommodated within the existing W22 limits, i.e. the PTB limits are not expected to be a constraining factor on the allocation of slots.
- 2.15 No other changes were proposed relative to the Winter 2022 limits, except updating the stand count to reflect expected changes in the count relative to Winter 2022.

- 2.16 The pre-meeting of the Coordination Committee took place on 15 March 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 actual airfield and security queue performance during Winter 2022 compared to Winter 2019 (November to February), prospective projects expected to be delivered for Winter 2023, projects that are expected to be under construction in Winter 2023, and potential operational changes which may be in place for Winter 2023.
 - Simulation modelling carried out by Dublin Airport, and for Dublin Airport by ARUP.
 - An update from ACL.
 - Proposed coordination parameters for Winter 2023.
- 2.17 The Coordination Committee met again on 27 March to produce advice for the IAA in respect of W23.

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 ANSP), 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.
- 2.19 It is important to note that we consider the voting process to be 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 have sought 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.
- 2.20 The votes on the proposed R60 limits are set out in Table 2.3 below. There was unanimous support for the proposals for the hours 1000 to 1800. There were mixed views on the appropriate runway parameters for the hours 0700, 0800, 1900, and 2200, with Dublin Airport, AirNav Ireland, and a number of airlines supporting the proposals and other airlines not supporting them. Among those who did not support the proposals, Aer Lingus stated that the North Runway is still operating reduced hours from 0900 to 1800, rather than 0700 to 2300 as previously planned. Aer Lingus considers that, while it is planned to extend the hours from June this year, the risk of further delay to that timeline means that it is not appropriate to add capacity in hours outside the current operational period. British Airways and United Airlines identified concerns around capacity in the 0700 and 0800 hours, including stand occupancy.
- 2.21 No changes were proposed within the Committee in relation to any hour other than those listed below.

2.22 The R10 limits were proposed to be updated in line with S23 to reflect dual runway operations. 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.

Member	Votes	0700	0800	1000	1100	1200	1300	1400	1700	1800	1900	2200
Aer Lingus	280	Ν	Ν	Y	Y	Y	Y	Y	Y	Y	Ν	Ν
AirNav Ireland	20	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
British Airways	37	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Dublin Airport	40	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
DHL	6	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Emerald	64	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
FedEx	5	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
KLM	17	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Lufthansa	22	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Ryanair	475	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Swiss	10	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
TUI	8	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
UPS	5	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
United	11	Ν	Ν	Y	Y	Y	Y	Y	Y	Y	Y	Y
Total in Favour		672	709	1000	1000	1000	1000	1000	1000	1000	720	683
% in Favour		67%	71%	100%	100%	100%	1 00 %	100%	100%	100%	72%	68%

 Table 2.3: Coordination Committee votes on proposed changes to hourly runway limits

Source: Coordination Committee.

2.23 The Committee then voted on Dublin Airport's proposal to roll forward the terminal building parameters. The results are set out in Table 2.4.

Member	Votes	Yes	No
Aer Lingus	280	V	
AirNav Ireland	20	V	
British Airways	37		
Dublin Airport	40		
DHL	6		
Emerald	64		
FedEx	5		
KLM	17		
Lufthansa	22		
Ryanair	475		V
Swiss	10		
TUI	8		
UPS	5		
United	11		
Total		525	475

Table 2.4: Coordination Committee votes on proposed Terminal limits

Source: Coordination Committee

- 2.24 The advice from the Coordination Committee is therefore to make no changes to the terminal parameters, with Ryanair opposed to this proposal on the ground that Terminal 1 winter parameters should be in line with summer, and that the winter parameters are being artificially constrained.
- 2.25 Thus, overall, the advice of the Coordination Committee is to implement the W23 Wishlist changes to the R60 limits, update the stand counts, 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 implemented the Wishlist adjustments to the W22 hourly runway limits ('R60'), as set out in Table 3.1.

UTC Hour*	Departures	Arrivals	Totals
0700	+4		+6
0800	+1		+1
1000	+1	+2	+2
1100	+2		+2
1200		+2	+3
1300	+1	+1	+2
1400	+1	+1	+2
1700	+1	+2	+2
1800	+1	+2	+3
1900	+1	+1	+2
2200		+3	+3
Total	+13	+14	+28

Table 3.1: Changes to runway limits from Winter 2022

Source: CAR

- 3.3 We adjust the 10 minute runway limits ('R10') in line with the proposal of Dublin Airport and AirNav Ireland, to which there were no objections.
- 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.

Runway Capacity

3.5 In this subsection, we consider runway capacity limits.

Egis Airfield Modelling

- 3.6 As described above, Egis first validated the airfield model and then simulated the W23 flight schedule under the following two scenarios:
 - Rolling forward the W22 R60 limits, i.e. making no changes to the limits compared to those in place for W22.

- Implementing the Wishlist adjustments to the W22 limits.
- 3.7 The model validation process was based on 8 January 2023. On this day 100% of operations were westerly, with the North Runway 28R operational for departures between 0900 and 1800.
- 3.8 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 real taxi out time is 9 seconds, with the simulation generating slightly lower taxi times than were observed in reality.
- 3.9 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 physical and operational ability of the airfield to deliver a flight schedule.
- 3.10 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.
- 3.11 Airfield infrastructure was updated in the model, based on expected situation during W23 in relation to taxiway closures for works and projects expected to be complete. No changes are expected in respect of operating procedures for minimum aircraft separations.
- 3.12 In both scenarios, it is presumed that the Winter 2023 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 scenarios, in the simulation.
- 3.13 The Winter 2023 flight schedule to be modelled was based on expected W23 demand, but also with sufficient operations to properly test out the proposed R60 capacity increases. It is based on the schedule of 8 January 2023, and then contains a total of 780 flights of which over 100 are new operations. Most of these movements could be accommodated at the times requested without any changes to the runway limits.
- 3.14 This means that some of the modelled operations may not materialise in W23 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

conservative relative to those likely to transpire if growth is weaker. Nonetheless, we consider it important to test out the potential impact of a decision to increase the capacity. To isolate the effect of a decision to implement the Wishlist relative to maintaining the W22 limits, we asked Egis to simulate the W23 Schedule coordinated according to the wishlist scenario and separately according to a baseline scenario in which no changes are made to the limits.

3.15 Table 3.2 summarises the results of the W23 Wishlist and W22 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. For these simulation scenarios, the updated R10 limits are included as proposed by Dublin Airport and AirNav Ireland. These limits have the effect of preventing within-hour bunching.

Time (UTC)	W23 Wishlist scenario	W22 limits scenario	Difference
Average (0530-0900)	00:12:24	00:13:12	- 00:00:48
Average (0900-2000)	00:12:36	00:12:42	-00:00:06
Average (2000-2130)	00:12:42	00:11:54	+00:00:48
Daily average	00:11:36	00:11:42	-00:00:06
Peak	00:14:36	00:14:48	-00:00:12

Table 3.2: Departure Taxi Out Time

Source: Egis, Slide 21. Taxi times in minutes and seconds.

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

- 3.16 In summary, relative to maintaining the Winter 2022 limits unchanged, the W23 Wishlist limits are expected to lead to:
 - No material impact on taxi-out times on average across the day, or on the peak taxi-out time.
 - A shorter morning peak due to W22 limits pushing more operations into earlier hours, such as between 0530 and 0600.
 - An increase in average taxi out time of 48 seconds between 2000 and 2100, due to the higher number of movements permitted under the W23 Wishlist limits and the knock-on effect of these.
 - No material impact on taxi-in times.
- 3.17 Given the discussions within the Coordination Committee on the risk that the North Runway operating hours would not be extended in June as planned, we asked Egis to run a sensitivity under which the North Runway was operational during 0900-1800 only. To assess the impact of a potential scenario whereby the extension of the North Runway operational hours to 0700-2300 would be delayed, Egis simulated the W23 Wishlist scenario but with the North Runway only operational from 0900-1800. The results are displayed at slides 28 and 29.
- 3.18 The results show the primary impact of the shorter operational window being in

the hours directly affected:

- Closure of the North Runway between 0700 and 0900 increases the peak taxi-out time from 14.5 minutes at 0800 to just over 18 minutes at 0900.
- Closure of the North Runway at 1800 results in a second peak of taxi-out times, again close to 18 minutes, at 1930.
- 3.19 In the late evening, there is then a secondary effect whereby a higher number of arrivals causes a longer departure queue, albeit for the small number of departing aircraft operating at that time.

Other Modelling

- 3.20 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.
- 3.21 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 Winter 2022

- 3.22 At the Coordination Committee pre-meeting, Dublin Airport provided an update on outturn operational performance in Winter 2022 compared to Winter 2019, from November to February inclusive. As noted in our Summer 2023 decision, this overview should be caveated by noting that trends across a season of single runway operations (such as Winter 2019) will be less comparable with the dual parallel operations now in place.
- 3.23 On Time Performance (OTP) in November and December 2022 remained significantly worse than the corresponding months of 2019. The gap narrowed in January, and by February this year, OTP has improved to a level slightly better than Winter 2019. Overall, across the four months, Arrival OTP is down by 12 percentage points and Departure OTP down by 13 percentage points. As we have noted previously, there are many factors which influence OTP at Dublin Airport other than those which relate to airport capacity. In both seasons, delay coded to Aircraft Rotation is the most significant contributor.
- 3.24 Average taxi-out times are in line with the performance seen in Winter 2019, at 13 minutes, which we note is also in line with the simulation modelling set out above. Average first wave taxi-out times (with the North Runway not yet operational for the first wave) have been 1 minute higher than in 2019.

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 our Draft Decision, we thus proposed to amend the hourly runway limits in

accordance with the W23 Wishlist, for the following reasons:

- The evidence from the Egis simulations suggests that the additional capacity proposed can be accommodated by the parallel runway system without any material causative impact on delay.
- Based on the Coordination Committee vote, the advice of the Committee is to declare runway limits in line with the Winter 2023 Wishlist.
- The evidence suggests that, even if the North Runway operational hours are not extended as planned before W23, the additional runway capacity will not lead to an unacceptable level of deterioration in performance.
- 3.26 We noted that the disagreement within the Coordination Committee relates to the hours in which the North Runway was expected to be operational by now, but is not, namely 0700 to 0900 and 1800 to 2300, and that it is planned to extend the hours in June. We stated that both Dublin Airport and AirNav Ireland expect to be able to facilitate the June date for extended operational hours. That date is four months before the start of W23.
- 3.27 We said that, while we have no reason to believe that the North Runway will not operate as planned between 0700 and 2300 in W23, we agree with Aer Lingus that it is prudent to consider a contingency scenario in which the operating hours remain at 0900 to 1800. As noted above, based on the Egis simulations, it is apparent that maintaining the shorter window would have a significant impact in the relevant hours, increasing the peak taxi-out time by 3.5 minutes, to 18 minutes. However, we did not consider this impact to be so significant as to warrant not declaring the additional capacity. We noted that the wishlist capacity ultimately declared for the last seasonal declaration before Covid-19, the S20 capacity parameters, showed a peak taxi-out time of over 26 minutes. The peak taxi-out time modelled in respect of the parameters declared for S23 was 19 minutes.
- 3.28 It is important to note that, while additional movements would contribute to delay in a scenario where the North Runway operational hours are not extended, much of this impact on taxi-out times is likely to materialise regardless of whether or not the additional R60 capacity is declared.
- 3.29 We concluded that 1) we expect that the hours will be extended by W23, and 2) even if they are not, the impact of that does not warrant withholding the proposed capacity, and 3) much of that effect on taxi times in such a scenario is likely to materialise regardless of the release of the proposed capacity. We thus proposed to declare the additional capacity in line with the wishlist proposal and the majority advice of the Coordination Committee.
- 3.30 As with the Summer 2023 declaration, we agreed with Dublin Airport 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 acclimatised to the changed operation. We also noted that further additional capacity is not likely required to accommodate the air traffic.
- 3.31 In line with Condition 4 of the North Runway planning permission, which limits

the use of the crosswind runway to '*essential occasional use*', we noted that our modelling assumes no use of the crosswind runway 16/34 as an active runway. As per the Summer 2023 declaration, we continue to take account of Condition 3 in respect of our simulations of the operation of the main runways. We also updated the Runway 28R Standard Instrument Departures (SIDs) based on the change put into effect from 23 February 2023.³

- 3.32 As set out in the S23 declaration decision, we noted that any potential Operating Restrictions within the meaning of Regulation (EU) No 598/2014 ought to be set out such that there is clarity on the scope and duration of the legally enforceable constraining factor which it will represent during a given scheduling season.⁴
- 3.33 Where this is not case, as particularly noted in the S23 decision in respect of Condition 5 of the North Runway planning permission, and should a determination subsequently be made such that an Operating Restriction falls to be enforced in that scheduling season in a manner which requires a reduction in operations, we noted that it may be necessary for us to review the affected parameters in the prevailing declaration and/or for parties not to use their allocated slots. Pending any such determination, we suggested that the R60 parameters in the referenced night hours (2300-0700 local) would again remain in line with the pre-existing single (southern) runway capacity for the W23 declaration.

Submissions Received on Draft Decision

- 3.34 Consistent with the view it expressed within the Coordination Committee, Aer Lingus does not support the release of R60 capacity outside the hours in which the North Runway is currently operational, namely 0900 to 1800. It suggests that our proposal is '*presumably on the hope that the runway will be open from 07:00 until late night by next winter*', as expressed by Dublin Airport, and states that AirNav Ireland did not commit to this within the Coordination Committee. Aer Lingus notes that the same approach was taken for the Summer 2023 declaration, and new slots have been allocated at times when the new runway is not yet operational.
- 3.35 Aer Lingus disagrees with our comparison of modelled delays between the declared capacities for Summer 2020 and Summer 2023, noting that there is no real-world experience to validate the assertion. It notes that the pandemic meant that only a fraction of the originally planned flights operated in Summer 2020, and Summer 2023 capacity is yet to peak.
- 3.36 Dublin Airport refers to its response to the S23 capacity declaration and reiterates that coordination parameters should be consistent with an appropriate interpretation of the terms of the North Runway Planning Permission and Condition 5. It acknowledges that the conditions attached to planning permission can give rise to complex questions of interpretation and

³ <u>https://www.dublinairport.com/corporate/north-runway/latest-news/2023/02/21/north-runway-revised-standard-instrument-departures-from-february-23-2023</u>

⁴ <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R0598</u>

notes that the interpretation of Condition 5 has been addressed in previous decisions on coordination parameters.

- 3.37 Dublin Airport again welcomes our view set out at paragraph 3.33 above, and emphasises that any decision of a competent authority as to the interpretation and application of Condition 5 may need to be implemented within a relatively short time frame. Accordingly, Dublin Airport believes that we should keep the matter under review and put in train contingency planning in advance of any such potential decision, noting that there is a precedent set during Covid-19 with Local Rule A, which could be used as a basis for applying a mandated reduction in capacity at Dublin Airport, should the scenario arise.
- 3.38 Dublin Airport notes that it has received a warning letter from Fingal County Council ("FCC") under section 152 of the Planning and Development Act, 2000 as amended, in respect of a number of operational planning issues which relate to the North Runway.
- 3.39 Liam O'Grádaigh, on behalf of St Margaret's the Ward residents group, also reiterates his views expressed ahead of the S23 parameters decision as to the proper interpretation of the Operating Restriction contained within Condition 5, in particular that it should be interpreted to apply on a year-round basis, and why that is so.
- 3.40 Liam O'Grádaigh also reiterates the material he previously provided in relation to the health implications of changes to Conditions 5 and 3(d). He states that it is not for CAR (now IAA) to decide how to interpret these conditions which relate to public health, as we do not have the expertise nor the legal remit. This is for the planning authority and ANCA. He notes that planning enforcement investigations are ongoing by Fingal County Council (FCC) in relation to a number of North Runway planning conditions and therefore our decisions for Summer 2023 and Winter 2023 are premature pending the outcome of these investigations.
- 3.41 Liam O'Grádaigh also refers to the Restriction in Condition 3 of the Terminal 2 planning permission (PL06F.220670), which provides that the combined '*capacity*' of Terminal 2 as permitted together with Terminal 1 shall not exceed 32 million passengers per annum. He notes that the first 3 months of 2023 are ahead in passenger numbers compared to the equivalent 3 months in 2019, and thus the capacity should not provide for slots exceeding the '*capability to handle more than 32m passengers*.'
- 3.42 Liam O'Grádaigh reiterates that Article 11 of SI No. 645 of 2003, which transposed Council Directive No 2002/30/EC, required that the airport authority notify interested parties including the IAA, of the introduction of Operating Restrictions in line with the Balanced Approach. The IAA was then, in turn, required to inform the Minister, EU Commission and other Member States. He considers that, if aircraft operators are suggesting that these Operating Restrictions are not legitimate based on non-adherence to Article 11, then it could also be argued that Dublin Airport's application to revoke and amend the Operating Restrictions is premature as the Operating Restrictions are not in effect. He suggests that we should question daa if they did not perform their

duty under SI No. 645 of 2003, and that we should follow up with the IAA to see if they have informed the Minister, EU Commission and other Member States.

Final Decision

- 3.43 In relation to the R60 capacity outside the hours in which the North Runway is currently operational, we would not agree with the characterisation of the likelihood that the day-time hours will be extended for W23 as a '*hope*'. It is the intention, as confirmed to us by both Dublin Airport and AirNav Ireland, for the hours to be extended from June. While we agree with Aer Lingus that it is possible that there will be a further delay relative to the original planned date of March this year, our analysis described in the Draft Decision suggests that, even if the hours are not extended for W23, any compounding effect on performance metrics generated by the additional permitted movements is not likely to be significant enough to warrant withholding the new capacity.
- 3.44 While we know that much of the S20 capacity was ultimately not operated, the comparison was only to contextualise the results of the simulations even in a scenario whereby the North Runway hours are not extended for W23. We note that the same point could be made with reference to the S19 simulation results, which relate to a season which was operated. The peak taxi-out time in the scenario which underpinned the S19 declaration was 27 minutes, relative to 18 minutes in the W23 simulations scenario where the North Runway hours are not extended.
- 3.45 We are thus not persuaded to change our approach to the R60 capacity in the day hours.
- 3.46 We note the further comments of Dublin Airport and Liam O'Grádaigh in respect of the potential capacity impact of Operating Restrictions deriving from the North Runway and/or T2 planning permissions. We continue to agree with Liam O'Grádaigh, as we set out in our S23 capacity decision, that it is not for us to determine the status of disputed, unclear and/or unnotified Operating Restrictions which apparently pose complex questions of planning, EU, and International law. We did seek to ascertain whether the notification and consultation requirements have yet been carried out, as suggested by Liam O'Grádaigh. We understand that the notifications referenced by Liam O'Grádaigh did not take place before SI No. 645 of 2003 was repealed. Notification requirements are now governed by Regulation (EU) No 598/2014 and the Aircraft Noise (Dublin Airport) Regulation Act 2019.
- 3.47 Again, we agree with Liam O'Grádaigh and Dublin Airport that it is important to consider plans for a scenario in which any further 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'.*

- 3.48 As referenced by Dublin Airport, Local Rule A provides some precedent in relation to how a capacity reduction might be allocated across aircraft operators.⁵ We would, however, also expect to receive further advice from the Coordination Committee in such a scenario.
- 3.49 We note the update from Dublin Airport in respect of its engagement with FCC and ask that Dublin Airport keep the Coordination Committee and the IAA informed of any developments in this regard. In relation to the suggestion from Liam O'Grádaigh that it is premature to declare capacity while FCC investigations are ongoing, we note that the W23 capacity must be declared in line with our timing obligations under the Slot Regulation.
- 3.50 Thus, consistent with each capacity declaration since S22, for now, no changes are made to the R60 limits 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 facilitate more flights in this period than were previously possible under the single Runway 28 based declaration.
- 3.51 Consequently, our Final Decision on the W23 runway parameters remains in line with our Draft Decision and in line with the advice of the Coordination Committee.

Parking Stands

- 3.52 In the Draft Decision, we proposed to retain the hard constraint on stands, while updating the stand count relative to W22 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.
- 3.53 No respondent made any representation in respect of the stand parameter. We confirm our proposal from the Draft Decision.

⁵ <u>https://www.iaa.ie/docs/default-source/car-documents/local-rule-a-(dublin)-final-(1).pdf?Status=Master&sfvrsn=8a014f3_0</u>

4. Terminal Building Coordination Parameters

- 4.1 As proposed in the Draft Decision, we have decided to roll forward the W22 rolling hourly PTB limits, which are set out in Table 4.1, to the W23 season.
- 4.2 We also maintain the load factor assumptions of 85% for scheduled services in Terminal 1, and 95% for charter services. We maintain the referral parameters in relation to Terminal 2 check-in desks and US Preclearance as per the W22 capacity.

	Departures	Arrivals
Terminal 1	3,700	3,550
Terminal 2	3,700	3,050

Table 4.1: Hourly Terminal Limits – W23

Source: IAA

Proposed Hourly Limits – Dublin Airport

- 4.3 Dublin Airport proposed to roll forward the PTB hourly limits from W22. It noted that, with the trial of the C3 machines ongoing and uncertainty as to the full extent of the benefits which this new technology will bring to the security processors, it is prudent to retain the current declared capacity until the benefit can be fully quantified. Dublin Airport also noted that the PTB limits are unlikely to be a constraining factor on the allocation of slots in W23, with the W23 Wishlist demand estimated to be 74% of the current available capacity.
- 4.4 This proposal was supported by all parties with the exception of Ryanair, who considers that the parameters should be in line with those declared for summer and thus the winter parameters are being artificially constrained.

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.

Draft Decision on Terminal Capacity Parameters

- 4.7 In the Draft Decision, we noted Ryanair's objection to the PTB parameters. We said that, given the potential differences between processing rates in summer and winter, the fact that the summer parameters are currently higher is not, alone, a compelling piece of evidence to increase the winter parameters.
- 4.8 We agreed with the proposal of Dublin Airport to maintain the existing limits for W23, in the context of uncertainty as to the capacity improvement which will be provided for by the C3 equipment during W23 and where the proposed T60

parameters are not in any case expected to be constraining on the allocation of slots. We noted that the majority advice of the Coordination Committee is to maintain the existing limits. We noted that, once the benefits of C3 can be fully identified, this will likely lead to an increase in the declared capacity for future seasons, as contended for by Ryanair.

4.9 We also proposed to roll forward all referral parameters from W22, noting that there were no objections or alternative proposals put forward by the Coordination Committee.

Responses and Final Decision

- 4.10 Aer Lingus supports the proposal to maintain the current limits, stating that it is too early in the deployment of the new C3 scanning machines to fully understand the processing and capacity benefits.
- 4.11 We note Aer Lingus' continued support for the proposed W23 PTB parameters and confirm our Draft Decision in that respect.

5. Appendix: Winter 2023 Coordination Parameters

The Irish Aviation Authority has determined the following scheduling limits for the Winter 2023 season at Dublin Airport.

Runway Scheduling Parameters:

Runway Hourly Limits									
Time UTC	Arrivals	Departures	Total						
	Limit	Limit	Limit						
0000	23	23	32						
0100	23	23	32						
0200	23	23	32						
0300	23	23	32						
0400	23	23	32						
0500	23	25	32						
0600	23	35	40						
0700	21	<u>35</u>	<u>46</u>						
0800	25	<u>24</u>	<u>45</u>						
0900	24	25	42						
1000	<u>25</u>	<u>25</u>	<u>43</u>						
1100	28	<u>28</u>	<u>50</u>						
1200	<u>28</u>	28	<u>49</u>						
1300	<u>25</u>	<u>28</u>	<u>45</u>						
1400	<u>25</u>	<u>25</u>	<u>42</u>						
1500	23	27	43						
1600	24	26	46						
1700	<u>26</u>	<u>28</u>	<u>49</u>						
1800	<u>26</u>	<u>27</u>	<u>46</u>						
1900	<u>24</u>	<u>25</u>	<u>40</u>						
2000	24	24	39						
2100	25	23	39						
2200	32	23	42						
2300	23	23	32						
Totals	<u>589</u>	<u>619</u>	<u>970</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 operations (2300-0659)								
Maximum Total 9								
Maximum Arrivals 6								
Maximum Departures 6*								
Exception: Maximum	Exception: Maximum Departure Limit is 7							
movements at 0600, 0610, 0620, 0630, 0640,								
0650								

Passenger Terminal Parameters:

	Departures	Arrivals
	Hourly Limit	Hourly Limit
Terminal 1	3,700	3,550
Terminal 2	3,700	3,050

Notes:

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

Stand Parameters:

	GA	No	n-	Turnaround Stands							All		
		Turnai	round	und									
	W.A.N	W.A.S	Total	5G	MRO	P1	P2	Р3	P4	S.A	Triangle	Total	Total
Contact						22	11	11	21	9		74	74
Remote	8	16	24	15	6	3					5	29	53
All	8	16	24	15	6	25	11	11	21	9	5	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