



**Draft Decision**  
**on Winter 2025 Coordination Parameters**  
**at Dublin Airport**

10 April 2025

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## 1. Executive Summary

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- 1.1 The IAA is responsible for declaring coordination parameters at coordinated Irish airports. In this paper we set out our Draft Decision on the Dublin Airport parameters for the Winter 25/26 ('W25') season, which runs from 26 October 2025 to 28 March 2026 inclusive.<sup>1</sup> The proposed coordination parameters are laid out in the appendix.
- 1.2 The Coordination Committee, comprising Dublin Airport<sup>2</sup>, AirNav Ireland (the Air Navigation Service Provider), and airlines operating at Dublin Airport, is required under Article 5 of the Slot Regulation to provide advice to the IAA on the coordination parameters to be declared in accordance with Article 6. The majority advice is to implement the 'W25 Wishlist' hourly runway capacity ('R60') limits, which involves a range of increases in the declared limits in the day hours. No other changes are proposed to be made.
- 1.3 Our Draft Decision on the Winter 2025 parameters is to follow the advice of the Coordination Committee and to implement the W25 Wishlist hourly runway capacity limits. This proposal would add an additional 41 daily runway slots. The coordination parameters are otherwise proposed to be unchanged relative to W24, with the exception of:
- Updating the stand counts to reflect changes expected relative to W24.
  - Not including any seasonal seat cap coordination parameter.
- 1.4 Following an application to the High Court by Ryanair, and a hearing on 28 March 2025, on 2 April 2025 the High Court delivered judgment, which will result in an order directing the IAA not to take account of the 32mppa Conditions, pending the outcome of underlying judicial reviews of our Winter 2024 and Summer 2025 decisions. As a result, unlike for Winter 2024 and Summer 2025, we do not propose to include a seasonal PATM seat capacity limit for the W25 season.
- 1.5 In arriving at our Draft Decision, 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 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 also 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 Alongside this paper we have published the following supporting documents:

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<sup>1</sup> As per the worldwide slot calendar: [CALENDAR OF COORDINATION ACTIVITIES](#)

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

- A final letter of advice received from the Coordination Committee on 7 April 2025.
- The results of the simulation modelling carried out by Egis.

1.8 We invite responses to this Draft Decision no later than 5pm, **Thursday 24 April 2025**. Responses should be sent by email to [consultation@iaa.ie](mailto:consultation@iaa.ie).<sup>3</sup>

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

## 2. Background

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### 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 take account of expected demand, capacity (including airspace capacity), and relevant constraining factors, during the relevant season, in an objective manner.
- 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, when taking account of relevant constraints in issuing a capacity declaration, we tend towards a maximal rather than minimal approach as regards declaring the airport capacity parameters. This is because of the

requirement that discussion within the coordination committee is '*with a view to increasing the capacity and number of slots available for allocation.*' This framing of the determination of the parameters is given further weight where a parameter is expected to have a constraining effect on demand, given that Article 6(1) requires the determination to be based on the '*possibilities of accommodating the air traffic*'.

### *Coordination Committee Process for W25*

- 2.7 To help inform the decision on the parameters, we engaged Egis to carry out simulations of the expected flight schedule for W25, using the Fast Time Simulation model of the apron, airfield, and airspace in the Dublin 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.
- 2.8 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 duration 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 the model is replicating the actual operation with a sufficient degree of accuracy.
- 2.9 Airlines were asked to submit plans for Winter 2025 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 by the runway parameters. A number of changes to the hourly runway (R60) limits relative to W24 were proposed by Dublin Airport, informed by the analysis carried out by ACL.<sup>4</sup> Dublin Airport set out its capacity limitations it had applied to the combined airline wishlist when developing its proposal, in particular that no changes would be made between 2300z and 0700z (or 11pm to 7am local time).

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<sup>4</sup> 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 is in line with Local time. Hence the 0500z hour spans from 5am to 6am local time.

In each hour, a requested departure slot must not bust the hourly Departures limits 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: Dublin Airport W25 Wishlist Proposal**

| UTC Hour | Arrival | Departure | Totals |
|----------|---------|-----------|--------|
| 0700     |         |           | +2     |
| 0800     | +3      |           | +3     |
| 0900     | +2      |           | +4     |
| 1000     | +2      |           | +4     |
| 1100     |         |           | +2     |
| 1300     | +3      |           | +4     |
| 1400     | +3      |           | +8     |
| 1500     |         | +4        | +4     |
| 1800     |         | +2        | +2     |
| 2000     | +1      |           | +4     |
| 2100     | +4      |           | +4     |
| Total    | +18     | +6        | +41    |

Source: Coordination Committee

- 2.10 Information provided by the airlines was used to develop an anticipated flight schedule on a busy day in Winter 2025, the 'W25 Schedule'. The operation of the W25 schedule was simulated by Egis. To assess the effect of a potential decision to adjust the R60 parameters as proposed above, Egis coordinated the W25 Schedule according to both the W25 Wishlist limits, and alternatively the current W24 runway limits. Comparisons were provided between simulated taxi times, ground delay and runway holding delay. Further details and results of this analysis are set out in Section 3, and the results of the Egis simulations are published alongside this document.
- 2.11 In relation to the passenger terminal (PTB) parameters, Dublin Airport proposed no changes relative to W24 in respect of either the departures or arrivals hourly limits.
- 2.12 No other changes were proposed relative to the Winter 2024 limits, except updating the stand count by apron area to reflect expected changes in the count relative to Winter 2024.
- 2.13 The pre-meeting of the Coordination Committee took place on 12 March 2025. Ahead of the initial meeting, the Egis simulation modelling results were circulated. Dublin Airport also circulated various analyses and modelling results to Committee members ahead of the initial meeting, namely:
- An update on airfield performance, On Time Performance (OTP) in Winter 2024 compared to Winter 2023, prospective projects expected to be delivered for Winter 2025, projects that are expected to be under construction in Winter 2025.
  - Simulation modelling carried out for Dublin Airport by ARUP.

- An update from ACL.
- Coordination parameter proposals for Winter 2025.

### *Coordination Committee Vote*

- 2.14 The Coordination Committee met again on 3 April 2025 to finalise its advice for the IAA in respect of W25.
- 2.15 Coordination Committee members voted on the proposed R60 runway parameters. Unusually, the Coordination Committee did not vote on the Passenger Terminal Building parameters, although we note that no proposals other than maintaining the W24 limits were made, and the advice from the Coordination Committee is for the retention of all parameters pertaining to the R10 limits, terminal T60 limits, and referral limits.
- 2.16 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, meaning most of the voting weight is held by airlines and, in particular, Ryanair and Aer Lingus. Only those present (online or in person) can vote.
- 2.17 We note that the voting process is an indicative part of the Coordination Committee's advice to the IAA, rather than the IAA being bound by the result. As part of the process, we seek to take into account all positions set out by Coordination Committee members as well as any associated comments or evidence relevant to the parameter declaration.
- 2.18 The votes on the proposed R60 limits are set out in the appendix. There was large support for the implementation of the W25 Wishlist within the Coordination Committee, with 95% of votes cast in favour of the proposal. In summary:
- Air France, KLM, and Swiss were not in favour of the W25 Wishlist proposal.
  - IATA and Sunexpress abstained.
  - All other airlines, including Aer Lingus and Ryanair, who account for the majority of voting rights, were in favour of the W25 Wishlist proposal.
  - Dublin Airport voted in favour of the W25 Wishlist proposal.
- 2.19 No changes were proposed within the Committee in relation to any hour other than those listed in Table 2.1.
- 2.20 The advice from the Coordination Committee is therefore to implement the W25 Wishlist, and otherwise make no changes to any other runway or terminal parameters.



### 3. Airfield Coordination Parameters

3.1 This section addresses, in turn:

- Runway parameters
- Stand parameters

3.2 In relation to the runway coordination parameters, we propose to implement the W25 Wishlist for the W25 season, as shown in Table 3.1.

**Table 3.1: Proposed changes to runway limits for Winter 2025 (W25 Wishlist)**

| UTC Hour | Arrival | Departure | Totals |
|----------|---------|-----------|--------|
| 0700     |         |           | +2     |
| 0800     | +3      |           | +3     |
| 0900     | +2      |           | +4     |
| 1000     | +2      |           | +4     |
| 1100     |         |           | +2     |
| 1300     | +3      |           | +4     |
| 1400     | +3      |           | +8     |
| 1500     |         | +4        | +4     |
| 1800     |         | +2        | +2     |
| 2000     | +1      |           | +4     |
| 2100     | +4      |           | +4     |
| Total    | +18     | +6        | +41    |

*Source: Coordination Committee*

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

3.4 We propose to retain the stand parameter as a hard constraint. 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 W25 flight schedule under the following scenarios:

- W25 Wishlist flight schedule coordinated to the proposed W25 Wishlist limits
- W25 Wishlist flight schedule coordinated to the existing W24 limits

- 3.7 The model validation process was based on 1 December 2024, using actual block times. On this day, 100% of operations were westerly.
- 3.8 The simulated metrics (taxi out times, runway throughout, 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 22 seconds, with the simulation generating slightly lower taxi out 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. 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 an appropriate way to assess the infrastructural and operational capacity 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. Airfield infrastructure was updated in the model, based on the expected situation during W25 in relation to any closures for works and projects expected to be complete. No changes are assumed in respect of operational procedures for minimum aircraft separations.
- 3.11 In each scenario, it is presumed that the Winter 2025 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.
- 3.12 The Winter 2025 flight schedule was based on expected W25 demand, but also with sufficient operations to properly test out the proposed R60 capacity increases. It contains a total of 800 flights (407 arrivals and 393 departures), including 66 new arrivals and 63 new departures.
- 3.13 This level of assumed growth means that some of the modelled operations may not materialise in W25 and thus the schedule can be considered as an aggressive growth scenario, with a likelihood that the performance metrics produced by the model may be worse relative to those likely to be observed if growth is weaker. Nonetheless, we consider it important to fully test out the potential impact of a decision to increase the capacity, and that capacity is used. To assess the effect of a decision to implement the W25 Wishlist relative to maintaining the W24 limits, we asked Egis to simulate the W25 schedule scenario coordinated to both the current W24, and the proposed W25 Wishlist parameters.

- 3.14 Table 3.2 summarises the results of the Wishlist and W24 limits simulations, as provided to the Coordination Committee. Further details are set out in the Egis simulations published alongside this Draft Decision.

**Table 3.2: Departure Taxi Out Time under W24 limits and the W25 Wishlist Proposal**

| UTC Hour      | W24 Limits | Wishlist Limits | Difference |
|---------------|------------|-----------------|------------|
| Daily Average | 00:12:10   | 00:12:17        | 00:00:07   |
| Peak          | 00:16:08   | 00:15:57        | 00:00:11   |

*Source: Egis. 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.*

- 3.15 In summary, relative to maintaining the Winter 2024 limits unchanged, the W25 Wishlist proposal is not expected to have a material impact on taxi-out times on average across the day, or on peak taxi-out times.

### *Other Modelling*

- 3.16 Dublin Airport commissioned ARUP to carry out simulation modelling on its behalf, which was also presented to the Coordination Committee. Modelling by ARUP similarly showed little difference between the W25 Wishlist and retaining the W24 limits, although peak taxi-out times differed by 00:01:12, and thus also did not suggest the W25 Wishlist would lead to a significant deterioration in airfield performance.

### *Taxi Out times and On Time Performance (OTP) in Winter 2024*

- 3.17 At the Coordination Committee pre-meeting on 12 March, Dublin Airport provided an update on outturn operational performance in W24 compared to W23.
- 3.18 On Time Performance (OTP) to the end of February was marginally behind W23, with both arrival and departure OTP down 0.5%. Aircraft Rotation remains the most significant source of delay minutes, but the proportion of delay it accounts for has decreased by 2 percentage points relative to W23.
- 3.19 Across the full day, average taxi-out times to RWY 28R increased compared with the W23 season (12.58 mins versus 12.43 mins in W23). Across the full day, average taxi-in times to RWY 28L decreased to 07:09 mins versus 07:30 mins in W23, while the average taxi-in time for first wave also decreased to 08:57 mins from 09:12 mins in W23.
- 3.20 A number of airfield, terminal, and pier projects are expected to be available in whole or in part for the W25 season. These are shown in Table 3.3 below.

**Table 3.3: Major Projects Expected for W25 relative to W24**

| Airfield Projects                    | Terminal/Pier Projects |
|--------------------------------------|------------------------|
| Apron 5H – 12 new NBE stand capacity | T2 Security C3 Upgrade |
| South Apron relocation (Gate 22)     |                        |
| Pier 1 west stands                   |                        |
| Taxiway E2                           |                        |

Source: Dublin Airport

### Draft Decision

- 3.21 Under the Slot Regulation, the parameters are to be reviewed with a view to increasing the capacity and number of slots available for allocation, based on an objective analysis of the possibilities of accommodating the air traffic.
- 3.22 We propose to amend the hourly runway limits in accordance with the W25 Wishlist for the following reasons:
- The evidence from the simulations, which take account of infrastructural, 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.
  - None of the other evidence outlined above suggests any deteriorating performance trends.
  - Based on the Coordination Committee vote, our proposal aligns with the advice of the Committee.
- 3.23 In recent capacity declarations, we have sought to take account of the potential constraining factor represented by Condition 5 of the North Runway planning permission.<sup>5</sup> This condition gives rise to complex questions of planning law, EU law, and international law, and is currently the subject of High Court proceedings to which the IAA is a notice party. In August 2023, daa obtained leave to seek judicial review of Fingal County Council’s enforcement notice (issued on 28 July 2023) in relation to alleged non-compliance by daa with Condition 5. A stay on the enforcement notice was also granted. The hearing commenced before the High Court on 12 March 2024. On 13 March 2024, with the consent of all parties, the proceedings were adjourned, with a view to the Court being updated at a later date in relation to An Bord Pleanála’s decision regarding the introduction of a new noise quota system to replace Condition 5. The proceedings have since been further adjourned while An Bord Pleanála’s final decision remains outstanding. The stay on the enforcement notice remains in place.
- 3.24 Thus, with any clarification of this matter still pending, and consistent with each declaration since S22, we propose no changes to the R60 limits in the night

<sup>5</sup> See, in particular, section 3 of the S23 Declaration: [cp5-2022-final-decision-on-summer-2023-coordination-parametersf238415a-5893-4288-8556-8a4bb98220bf.pdf](https://www.daa.ie/media/123456789/cp5-2022-final-decision-on-summer-2023-coordination-parametersf238415a-5893-4288-8556-8a4bb98220bf.pdf)

hours relative to those which were in place prior to completion of the North Runway. This again means that no capacity has been added between 2300 and 0700 local time since completion of construction of the North Runway, meaning that the North Runway cannot lead to more flights in this period than were previously possible under the single Runway 28L based capacity declaration.

## **Parking Stands**

- 3.25 We propose 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, as set out in the Appendix. Dublin Airport proposed maintaining the current parameter while updating the count, as usual, to reflect seasonal changes and the addition of the Apron 5H project, which will provide 12 new narrow body equivalent stands. There was no objection or alternative proposal made within the Coordination Committee.

## 4. Terminal Building Coordination Parameters

- 4.1 We propose to roll forward the W24 rolling hourly Passenger Terminal Buildings (PTB) limits, which are set out in Table 4.1, to the W25 season.
- 4.2 We also maintain the peak hourly load factor assumptions of 85% for scheduled services, and 95% for charter services. We also propose to maintain the referral parameters in relation to Terminal 2 check-in desks 1 to 28, and the US Preclearance facility, as per the W24 capacity declaration.

**Table 4.1: Proposed hourly Terminal Limits – W25**

|                   | Departures | Arrivals |
|-------------------|------------|----------|
| <b>Terminal 1</b> | 3,700      | 3,550    |
| <b>Terminal 2</b> | 3,700      | 3,050    |

Source: IAA

### Proposed Hourly Limits

- 4.3 No proposal was made for any changes to the PTB hourly limits.

### Proposed Referral Limits

- 4.4 No proposal was made for any changes to the referral parameters in relation to Terminal 2 check-in desks or US Preclearance.

### Seasonal Terminal Seat Capacity Constraint

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

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

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

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

- 4.7 We refer to these conditions collectively as the ‘32mppa Conditions’. As set out in the W24 and S25 decisions, the IAA had no role in the decision to impose the 32mppa Conditions and has no power to amend or revoke them. The role of the IAA is to take account of relevant constraints when determining the

seasonal coordination parameters. For the reasons set out in detail in those decisions, the IAA considers the 32mppa Conditions to currently constitute a relevant constraint for the purposes of Article 6 of the Slot Regulation.<sup>6</sup>

- 4.8 The IAA's conclusion in that regard, and in respect of a number of related points, is disputed by various parties, who have brought a total of six sets of judicial review proceedings in respect of our W24 and S25 decisions.
- 4.9 On 10 October 2024 we published our Final Decision on S25 which set a seat capacity limit of 25.2 million seats for the Summer 2025 scheduling season. Ryanair, Aer Lingus, and, together, Delta Air Lines, Inc., JetBlue Airways Corporation, United Airlines, Inc., and Air Transport Association of America, Inc. (known as the 'A4A parties') were granted leave on 21 October 2024 to bring their respective proceedings challenging the S25 Decision, in which they also sought a stay on the operation of the seat cap coordination parameter. The IAA adopted a neutral position in respect of the stay application, whereas daa opposed it. On 4 November 2024, the High Court granted the stay<sup>7</sup>, and consequently the seat cap coordination parameter is currently inoperative for S25.
- 4.10 In December 2024, the High Court then decided to refer three questions to the Court of Justice of the European Union, on the basis that it would not be possible to resolve the W24 and S25 proceedings without a ruling on various questions of interpretation and application in relation to the Slot Regulation.<sup>8</sup> The three questions referred are:
1. Can a national competent authority undertaking the exercise of determining the parameters for slot allocation at a coordinated airport under Article 6(1) of Regulation 95/93 (as amended) take into account development consents granted by the relevant planning authority under the national planning code in respect of that airport which impose conditions providing *inter alia* that the "*combined capacity*" of the airport terminals shall not exceed a certain annual limit of passengers, and in respect of which the stated reason for the imposition of the conditions was "*Having regard to the policies and objectives of the Dublin Airport Local Area Plan and the capacity constraints (transportation) at the eastern campus*"? Are such conditions a "*relevant technical, operational or environmental constraint*" within the meaning of Article 6(1)? Do they form part of the objective analysis of the capacity situation at the airport for the purposes of Article 6(1)?
  2. If the answer to question 1 is yes, does Article 6(1) of Regulation 95/93, and insofar as relevant Articles 16 and 17 of the Charter of Fundamental Rights of the European Union, permit Member States to make a determination of the parameters for slot allocation at a coordinated airport for a particular scheduling period which results in the non-allocation of some series of slots (or certain components thereof) to which air carriers would otherwise be

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<sup>6</sup> [w24-final-decision\\_final.pdf \(iaa.ie\)](https://www.iaa.ie/docs/default-source/1c-economic-regulation/s25-final-decision_final.pdf?sfvrsn=a88decf3_1)

[https://www.iaa.ie/docs/default-source/1c-economic-regulation/s25-final-decision\\_final.pdf?sfvrsn=a88decf3\\_1](https://www.iaa.ie/docs/default-source/1c-economic-regulation/s25-final-decision_final.pdf?sfvrsn=a88decf3_1)

<sup>7</sup> See judgment at: [https://www.courts.ie/view/Judgments/15161097-34b3-4ec5-aade-92ad2fc65032/5b56a7ee-3bf3-4cdd-95fa-79b0c13c6fac/2024\\_IEHC\\_624.pdf/pdf](https://www.courts.ie/view/Judgments/15161097-34b3-4ec5-aade-92ad2fc65032/5b56a7ee-3bf3-4cdd-95fa-79b0c13c6fac/2024_IEHC_624.pdf/pdf)

<sup>8</sup> See ruling at: [Judgments | The Courts Service of Ireland](https://www.courts.ie/view/Judgments/15161097-34b3-4ec5-aade-92ad2fc65032/5b56a7ee-3bf3-4cdd-95fa-79b0c13c6fac/2024_IEHC_624.pdf/pdf)

entitled in accordance with the terms of Article 8(2)?

3. If this arises for consideration strictly as a result of the Court's answers to questions 1 and 2, does the Slot Regulation prohibit Airport Management Bodies within the meaning of the Slot Regulation from taking unilateral action to close the airport for a period of time, for the purpose of preventing the operation of slots which have been allocated by the Airport Coordinator so as to avoid a breach of an annual limit of passengers of the type mentioned in Question 1?
- 4.11 On 11 February 2025, Ryanair wrote to the parties involved in the W24 and S25 proceedings proposing that, pending the delivery of the CJEU ruling on the questions referred and the determination of the proceedings by the High Court, the IAA should not take account of the 32mppa Conditions in setting coordination parameters. Aer Lingus and the A4A parties agreed with the Ryanair proposal. The IAA adopted a neutral position. daa outlined its opposition to the proposal. The order ultimately sought by the airlines was as follows:

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

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

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

- 4.13 As a result of the High Court's granting of the order in the terms set out above, the IAA has not taken account of the 32mppa Conditions in this Draft Decision, and consequently does not propose to include a seasonal seat cap coordination parameter for W25. The IAA expects that the associated order will be perfected by the court shortly, and ahead of the final W25 decision. The IAA intends to comply with the order when determining the coordination parameters for W25.

#### *Draft Decision on Terminal Coordination Parameters*

- 4.14 The IAA notes that while the Coordination Committee did not vote on the Dublin Airport proposal to retain the PTB limits from W24, other than in respect of the



seat cap, there were no proposals for any alternative approach. While no vote took place, the advice letter provided by the Coordination Committee ultimately reflects a proposal to retain the terminal T60 limits and referral parameters, for the reasons outlined within the coordination committee. In particular:

- The absence of any major changes in terminal processing capacity. While the rollout of the 'Next Generation' security equipment is expected to be completed within W25, it is prudent to await for the rollout to be complete before assessing resulting capacity changes.
- The W24 hourly terminal coordination parameters are sufficient the W25 forecast flight schedule, i.e. they are not expected to be a materially limiting constraint on demand.
- The modelling carried out by Dublin Airport shows service standards remaining at acceptable levels.

4.15 We propose to roll forward the hourly PTB limits from the W24 season. We also propose to maintain the hourly peak load factor assumption of 85% for scheduled services, and 95% for charter services. We propose to maintain the referral parameters in relation to Terminal 2 check-in desks 1 to 28, and US Preclearance as per the W24 capacity.

4.16 As outlined above, the IAA will not take account of the 32mppa Conditions, whether by imposing a seasonal seat cap coordination parameter or otherwise.

## 5. Appendix 1: Proposed Winter 2025 Coordination Parameters

The Irish Aviation Authority proposes the following scheduling limits for the Winter 2025 season at Dublin Airport.

### Runway Scheduling Parameters:

| Runway Hourly Limits |                |                  |             |
|----------------------|----------------|------------------|-------------|
| Time UTC             | Arrivals Limit | Departures Limit | Total 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             | 35               | 48          |
| 0800                 | 28             | 24               | 48          |
| 0900                 | 26             | 25               | 46          |
| 1000                 | 27             | 25               | 47          |
| 1100                 | 28             | 28               | 52          |
| 1200                 | 28             | 28               | 49          |
| 1300                 | 28             | 28               | 49          |
| 1400                 | 28             | 25               | 50          |
| 1500                 | 23             | 31               | 47          |
| 1600                 | 24             | 26               | 46          |
| 1700                 | 26             | 28               | 49          |
| 1800                 | 26             | 29               | 48          |
| 1900                 | 24             | 25               | 40          |
| 2000                 | 25             | 24               | 43          |
| 2100                 | 29             | 23               | 43          |
| 2200                 | 32             | 23               | 42          |
| 2300                 | 23             | 23               | 32          |
| Totals               | 607            | 625              | 1011        |

| 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 Departure Limit is 7 movements at 0600, 0610, 0620, 0630, 0640, 0650 |    |

**Passenger Terminal Parameters (hourly):**

|            | Departures<br>Hourly Limit | Arrivals<br>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    |       | Non-Turnaround |    | Turnaround Stands |          |     |    |    |    |    |     | All        |  |
|---------|-------|-------|----------------|----|-------------------|----------|-----|----|----|----|----|-----|------------|--|
|         | W.A.N | W.A.S | Total          | 5G | 5H                | Triangle | MRO | P1 | P2 | P3 | P4 | S.A | Total      |  |
| Remote  | 8     | 14    | <b>22</b>      | 15 | 12                | 3        | 6   | 3  | -  | -  | -  | -   | <b>61</b>  |  |
| Contact | -     | -     | -              | -  | -                 | -        | -   | 22 | 11 | 11 | 19 | 9   | <b>72</b>  |  |
| All     | 8     | 14    | <b>22</b>      | 15 | 12                | 3        | 6   | 25 | 11 | 11 | 19 | 9   | <b>133</b> |  |

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 |

## 6. Appendix 2: Coordination Committee Vote

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| Committee Member  | Vote       |           |           |
|-------------------|------------|-----------|-----------|
|                   | Yes        | No        | Abstain   |
| Dublin Airport    | 40         |           |           |
| IATA              |            |           | 10        |
| Aer Lingus        | 260        |           |           |
| Air France        |            | 9         |           |
| American Airlines | 9          |           |           |
| British Airways   | 36         |           |           |
| Delta Air Lines   | 10         |           |           |
| DHL/EAT           | 7          |           |           |
| Emerald Airlines  | 99         |           |           |
| Emirates          | 6          |           |           |
| Fedex             | 7          |           |           |
| Finnair           | 4          |           |           |
| Iberia            | 5          |           |           |
| KLM               |            | 15        |           |
| Luxair            | 2          |           |           |
| Norwegian         | 2          |           |           |
| Play              | 3          |           |           |
| Qatar Airways     | 6          |           |           |
| Ryanair           | 427        |           |           |
| SAS               | 10         |           |           |
| Sunexpress        |            |           | 2         |
| Swiss             |            | 8         |           |
| United Airlines   | 9          |           |           |
| UPS               | 6          |           |           |
| Vueling           | 7          |           |           |
| <b>Total</b>      | <b>955</b> | <b>33</b> | <b>12</b> |
| <b>% of Total</b> | <b>95%</b> | <b>3%</b> | <b>1%</b> |

Source: Coordination Committee