



Ms. Ethna Felten, Director
Aircraft Noise Competent Authority (ANCA)
Fingal County Council,
County Hall, Swords
Co. Dublin, K67X8Y2

28 February 2022

Dear Ms Fenton,

Dublin Airport new North Runway planning conditions

We are contacting you in response to the Aircraft Noise Competent Authority (ANCA) consultation related to the planning conditions that accompany the introduction of the new runway at Dublin Airport. IATA is the trade association for the world's airlines, representing some 290 airlines or 82% of total air traffic and 8 of the 10 carriers by slot holding size operating at Dublin Airport (DUB). IATA supports many areas of aviation activity and helps formulate industry policy on critical aviation issues that underpin and help standardise the industry.

We have previously set out our concerns that the inclusion of a movement cap between the hours 2300 and 0700 at just 65 movements per night will be detrimental to existing airline networks, risks negatively impacting Ireland's economy and may constrain passenger choice. There are carriers currently operating historic slots scheduled during the night period that have grown over the previous years to provide cargo, freight forwarding and passenger flights. The proposed reduction in movements would have an impact on the viability of these operators at Dublin and the great benefits they provide.

In December 2020, Dublin Airport Authority (daa) submitted its application (Planning Ref. F20A/0668) to the planning authority to amend and replace Conditions 3(d) and 5 and applied to amend the conditions to state:

- **Condition 3(d) (new):** The North Runway cannot be used for landings or take-offs between midnight and 6am.
- **Condition 5 (new):** A noise quota system is proposed for night time noise at the airport. The airport would be subject to an annual noise quota of 7990 between the hours of 11.30pm and 6am.
- The daa application also proposes a series of noise mitigation and monitoring measures.

IATA supports the changes proposed by daa including the restriction on take-off or landings on Runway 10L-28R between 0000 hours and 0559 hours except in specific cases (amending Condition 3(d)) and the introduction of an annual noise quota of 7990 between the hours of 2330 hours and 0600 hours (replacing Condition 5).

The 6.5 hour time period for the application of the noise quota system (NQS) is aligned with other European Airports. It is important to ensure that both runways can be used between the peak departure times of 0600 and 0800 hours. The changes proposed by the daa are consistent with ICAO's Balanced Approach and Regulation EU 598/2014 introduction of noise-related operating restrictions



at Union airports within a Balanced Approach). If adopted they would improve flexibility during the shoulder hours of airport operations and relieve congestion and improve connectivity. Given the importance of tourism for the Irish economy, ensuring connectivity through operational flexibility is vital for recovery and growth.

It is understood that noise charges will be applied to aircraft arriving or departing in a night period and these charges should be used to fund noise alleviation or prevention measures. The Application proposes noise mitigation measures including the voluntary residential sound insulation grant scheme (RSIGS). The noise charging scheme should be revenue neutral for the airport with unspent sums returned to the airlines. The financing, implementation and performance of noise alleviation or prevention measures funded through noise-related charges should be transparent and monitored through key performance indicators and defined milestones agreed at consultations.

IATA welcomes the approach taken by ANCA, including a focus on the ICAO balanced approach, the introduction of a QC scheme to ensure there is balance between the interests of airport users and the local community and ANCA's recognition of the benefits of the North Runway to the wider Irish economy. Some concerns remain for cargo carriers, which are especially reliant on night operations and that have fleet replacement cycles that differ to passenger operations.

Thank you for taking the time to consider this response. Should you have any questions or comments, we stand ready to discuss the proposals with you further.

Yours sincerely,

A handwritten signature in black ink, appearing to read "S McNamara", with a long horizontal flourish underneath.

Simon McNamara
Country Manager United Kingdom & Ireland