

Joe Mahon
Aircraft Noise Competent Authority
County Hall
Swords
Co. Dublin
K67 X8Y2
aircraftnoiseca@fingal.ie

1 April 2021
[By email]

Dear Sir,

RE: Direction 01 by the Competent Authority in relation to planning application F02A/0668 under Section 9(10) of the Aircraft Noise (Dublin Airport) Regulation Act 2019 to provide information and assessments for the purposes of the Noise Situation at the Airport.

ANCA Ref: ANCA-F20/0668-D01

I refer to the above referenced matter and receipt of the Aircraft Noise Competent Authority's (ANCA) 'Direction 01' dated 24th February 2021. We note that ANCA has identified that a Noise Problem¹ would arise at Dublin Airport from the taking of the Relevant Action as proposed by application ref. F20A/0668. As such, ANCA will now proceed to adopt a Noise Abatement Objective (NAO) and apply the Balanced Approach.

The above referenced correspondence received by this office identifies both 'overarching' and 'specific' information that is required to be provided to ANCA pursuant to Section 9(10)(a) of the Aircraft Noise Regulation Act 2019 (the 2019 Act) for the purposes of an assessment of the noise situation at the airport.

Following review of the extensive list of information and assessments to be provided (as set out in Appendix A of ANCA's Direction 01) and having regard to the fact that this is the first Direction we have received under Section 9 (10)(a), we would be grateful for guidance as to the appropriate manner in which to structure the provision of the requested information and assessments.

In addition, we also set out below, for confirmation/clarification purposes, daa's understanding of several items specified in the Direction.

The additional items for confirmation/clarification are as follows:

¹ Within the meaning of Section 9(2) of the Aircraft Noise Regulation Act 2019



Appendix A Overarching Information requests:

1. ANCA's Request

Item A sets out the following:

Noise and other environmental forecasts for additional assessment years and scenarios are requested with relation to the following:

- *Extension of the analysis for all scenarios inclusive of the 32mppa passenger cap to cover:*
 - o *'unconstrained forecasts' (without North Runway Condition 5, **with annual passenger cap**) for 2030, 2035 and 2040; and*
 - o *'constrained forecasts' (with North Runway Condition 5, **with annual passenger cap**) extended to include outputs for 2030, 2035 and 2040.*
- *Extension of the analysis for all forecasts excluding the 32mppa passenger cap (i.e., growth potential) to cover:*
 - o *'unconstrained forecasts' (without North Runway Condition 5, **with annual passenger cap**) for 2030, 2035 and 2040; and*
 - o *'constrained forecasts' (with North Runway Condition 5, **with annual passenger cap**) extended to include outputs for 2030, 2035 and 2040.*

[our emphasis added]

daa's understanding of the request

There appears to be duplication in the descriptions of the 'Extension of the analysis for all scenarios inclusive of the 32mppa passenger cap' and 'Extension of the analysis for all forecasts excluding the 32mppa passenger cap (i.e., growth potential)' as both descriptions include 'with annual passenger cap' as highlighted in **bold** above.

As such, we propose to respond to this request by providing the information with the passenger cap in place in both cases, but you might clarify the position if that does not reflect the intention.

2. ANCA's Request

Under item A, ANCA has requested that the analysis for all scenarios be extended. When referencing the 'constrained' and 'unconstrained' scenario's the request refers to scenarios with and without Condition 5.

daa's understanding of the request

The request as currently framed does not include reference to Condition 3 (d).

We understand that these scenarios should also include scenarios with and without Condition 3 (d). I.e. the request should read 'unconstrained/constrained forecasts' (with/without North Runway Condition 3(d) and 5,).

This item also relates to specific information requests no. 33 to 35.

Please confirm this understanding is correct.



Specific Information requests:

1. ANCA's Request

Item 22 of ANCA's request states *'The applicant is requested to provide modelling data on ATMs for the period 23:00-23:30 and 06:00-07:00'.*

daa's understanding of the request

We presume this request would be satisfied by providing details of the ATMs in the hours of 2300-2330 and 0600-0700 in the various scenarios to be analysed.

Please confirm that this is in order to address this item.

2. ANCA's Request

Item 35 of ANCA's request states the following:

'The Applicant is requested to develop and submit the following analysis:

Alternative Assumptions (separate scenarios)

- *By 2025, annual pax/ATM value to be consistent with continuation of historic growth (2009-19) of seats/ATM at Dublin, with seat factor also assumed to have fully recovered to 2019 levels.*
- *Ryanair base aircraft at Dublin to be fully switched to B737MAX by 2025.*

Key Outputs For each Scenario

- *Unconstrained annual forecasts (without North Runway Condition 5, with annual passenger cap) for 2025.*
- *92-day Summer Night Period ATM Forecast for 2025, including QC for Night Period ATMs (unconstrained, for existing and proposed shorter Night Period).*

Further Sensitivities

Further sensitivities may be submitted on receipt of responses to clarification questions and additional information requests.'

daa's understanding of the request

It is our presumption based on the "key outputs" listed, that this request would be satisfied by providing details of the forecast aircraft movements, passengers, and associated QC assessments for the scenarios to be analysed.

Please confirm that this is in order to address this item.

3. ANCA's Request

At Item 106, ANCA requests the provision of data for 2016 in relation to the Noise Action Plan for Dublin Airport in the same format as provided by daa for 2018 as per the Aircraft Noise Reporting Template.

daa's understanding of the request

It should be noted that the methodology used for 2018 data as provided by daa differs to that adopted for END mapping in 2016. For example the INM software was used for the END mapping work (2016 data), whereas AEDT has been used for the latest work (2018 data).

In response to this request we propose that the 2016 data that has been requested will be re-calculated using the same methodology as the rest of the scenarios presented in the EIAR.

Please confirm that this is in order to address this item.



4. ANCA's Request

Item 121 of ANCA request relates to 'Dispersion' and states '*See Request 111*'.

daa's understanding of the request

Request 111 relates to evidence regarding '*assumed flight paths*', whereas Request 112 relates to '*Dispersion*'.

We consider that item 121 of ANCA's request should state '*See Request 112*'.

Please confirm that this is correct.

5. ANCA's Request

Item 124 of ANCA request relates to the 'NADP 2 departure procedure' and states '*See Request 117*'.

daa's understanding of the request

Request 117 relates to the request to provide evidence that the forecasts prepared with the application responds to NS-2, whereas Request 118 relates to the provision of evidence to confirm that environmentally, NADP2 is the best departure procedure for the airport.

We consider that item 124 of ANCA's request should state '*See Request 118*'.

Please confirm that this is correct.

6. ANCA's Request

Item 127 of ANCA request relates to the '*Dublin Airport North Runway, Regulation 598/2014 (Aircraft Noise Regulation) Forecast Without New Measures and Additional Measures Assessment Report*' and particularly the text within '*Table 3 -1 (4 of 6) Noise Reduction Mitigation Measures Screening Matrix*' which states '*This measure is an existing measure at Dublin Airport and is assumed as part of the Forecast without New Measure scenario; therefore, further assessment was not conducted. The IAA ANSP endeavours to include CDA segments in its arrival procedures to the maximum extent possible*'.

Item 127 states '*See Request 109*'.

daa's understanding of the request

Request 109 relates to the 'significance matrix' that has been adopted and outlines that the matrix should be demonstrated in terms of how changes in noise exposure at various magnitudes translate into changing effects.

Request 110 relates to scenarios considered and requests that evidence of the outcomes of engagement with the IAA and to demonstrate why the noise abatement operating procedures cannot be considered.

We consider that item 127 of ANCA's request should state '*See Request 110*' rather than '*See Request 109*'.

Please confirm that this is correct.

7. ANCA's Request

The final point of Item 131 refers to '*Use of the North Runway allied to a quota in the periods 2300 to 2330 and 0500 to 0700*'.

daa's understanding of the request

We consider that the above underlined '*0500*' should be replaced with '*0600*'. Please confirm that this is correct.



Conclusion

We would appreciate that ANCA's response to this request could be provided within 10 business days (as suggested in your email dated 2nd March 2021) or as soon as practical afterwards.

Yours faithfully

Gavin Lawlor

Director