



## **ACI EUROPE CONTRIBUTION TO THE AIRCRAFT NOISE CONSULTATION OF THE AIRCRAFT NOISE COMPETENT AUTHORITY (ANCA), FINGAL COUNTY COUNCIL**

February 2022

ACI EUROPE (Airports Council International) welcomes the opportunity to input to the proposals concerning future noise management at Dublin airport. ACI EUROPE represents over 500 airports in 55 countries, facilitating over 90% of commercial air traffic in Europe.

ACI EUROPE would like to make the following **general recommendations concerning the draft Noise Abatement Objective (NAO)**:

### **1) Acknowledging the complexity of noise impacts**

We recognise that transportation noise does entail health risks, however their magnitude is subject to uncertainties, as outlined in the WHO Environmental Noise Guidelines for the European Region from 2018. Studies on the health impacts of noise almost invariably conclude that further work is needed e.g., to investigate confounding factors, to extend to wider geographic areas, to gather more detail, to extend analysis, or to focus on more longitudinal time scales.

Non-acoustic factors also play an important role, and these are less understood. Non-acoustic factors cover, amongst other issues, subjective variables related to people's attitudes and perceptions. This relates to the subjective nature of what constitutes noise and the prompters of irritation and influences how different people react to noise. Therefore, selecting health as the objective's focus does bring with it uncertainties due to the confounding and non-acoustic factors that exist.

### **2) Addressing noise in the broader context of quality of life and sustainability**

ACI EUROPE has a long-standing commitment to sustainability, covering all its dimensions – environmental, social and economic. The ACI EUROPE Sustainability Strategy for Airports, initially published in June 2019 and then updated in November 2020, provides a framework to help airports increase the sustainability of their operations across these dimensions, recognising their interdependencies and complexities. Addressing the impacts of aircraft noise is a key element in this strategy, considered in the broader context of quality of life, which is also determined by social and economic aspects. ACI EUROPE believes that the same comprehensive, interdisciplinary approach needs to be adopted when defining noise policies.

Aviation provides many societal benefits – directly and indirectly – such as jobs and contribution to GDP. In 2018, the operations of the aviation industry directly generated a \$245 billion contribution to GDP and overall air transport supported 13.5 million jobs and \$991 billion in European economic activity. Also in 2018, spending by foreign visitors who flew to European countries supported an estimated 5.6 million jobs and a \$324 billion contribution to GDP. (Source: ATAG Aviation Benefits Beyond Borders report, September 2020)

Night flights are an important contributor to these benefits especially given time zone differences and scheduling requirements, which do provide benefits to airlines, local and national economies enabling airlines to offer services that boost connectivity, trade and business links between global cities. An example that demonstrates this is from the UK, when direct, indirect, induced and wider impacts are combined, night flying across the whole night has a total impact of £16.5 billion and 213,200 jobs across the UK. (Source: The Economic Impact of Night Flying in the UK, Airlines UK July 2021) These are significant economic contributions.

In the context of noise policies, it is important to understand the health benefits entailed by the above social and economic impacts, in particular those related to employment, travel and a strong local economy. Research on the economic and social impacts of aviation tends to focus on its added value in terms of jobs and economic growth, but the impact of the latter on health and quality of life has so far not been sufficiently analysed. In particular, there is limited published research that seeks to identify the aggregated impact of the positives and negatives of aviation and consequently, policies that could help balance them. Building on additional research in this area, an internationally recognised methodology that enables a structured and consistent approach for assessing noise mitigation initiatives and outcomes should be established.

In relation to land-use planning, if the proposed NAO is to consistently guide decision-making, then there needs to be a recognition of areas affected by noise and limits placed on the numbers of new dwellings approved in any local or regional development plans. It seems unreasonable to hold the airport to account to adhere to the NAO if new homes are built in areas affected by noise. It is our view that implementation of the NAO will require that all relevant authorities involved in land-use planning follow the NAO.

ACI EUROPE would like to make the following **general recommendations concerning the draft Regulatory Decision (DRD)**.

3) Following the ICAO Balanced Approach to noise management

The ICAO Balanced Approach has been adopted by all ICAO Member States and is enshrined in EU law through Regulation 598/2014. This requires that a noise abatement objective is defined for each airport, measures available are identified and the cost effectiveness of each is thoroughly evaluated. Operating restrictions shall not be applied as a first resort, only after consideration of the other pillars of the Balanced Approach (specifically reduction of noise at source, noise abatement operational procedures and land-use planning).

It is essential that Competent Authorities analyse, in detail, the impacts of their proposals, both in terms of its expected benefits but also costs to the industry – total scheduling costs, retiming of flights, impact of increased delays, diversions and cancellations. In addition, the above mentioned broader social benefits of connectivity, trade and tourism and related positive health effects, all need to be evaluated carefully. This enables Competent Authorities to

compare costs and benefits and identify the solution which achieves the best possible balance between them.

In doing so and in accordance with Article 5 of Regulation 598/2014 any measures shall not be more restrictive than is necessary in order to achieve the NAO set for the airport. In addition, Operating Restrictions shall be non-discriminatory, in particular on the grounds of nationality or identity, and shall not be arbitrary.

#### 4) Condition 1 of draft RD

A Quota Count (QC) system is an established method of managing aircraft noise typically at night. The proposal however of establishing QC limits over 8 hours is unusual. In many of the airports where such quota count systems are in use the system is utilised to protect the core night hours – typically 2330-0600 – being of 6.5 hours duration. The effect of applying a QC system to a longer period can be to provide less protection over the core hours – as the agreed number of QC points can be used at any time across the 2300-0700 period. A 6.5-hour duration with a lower number of QC points may provide a tighter control over the core night hours.

The geographical location of Dublin may lend itself to being better suited to a 6.5-hour restricted period rather than 8 hours. This is because transatlantic arrivals will land earlier in Dublin than say London, Paris or Amsterdam. Similarly for the airlines to operate efficiently and achieve utilisation rates there is also a need for early morning departures and late evening arrivals.

In relation to the proposed operating restrictions based on the QC of specific aircraft, it is not clear from the draft RD Report if such a restriction, as proposed over the 8 hour period, is required in order to meet the NAO. If such a restriction is to be introduced by 2030, further details of its impact on specific aircraft types and operators should be provided. This would allow for a structured and well planned phasing out of such aircraft in accordance with the requirements of Regulation 598/2014 and only if this is necessary to meet the NAO.

#### 5) Condition 2 of draft RD

This condition relates to the specific use of the North Runway at night. The preferential use of runways is a recognised measure to manage noise within the Balanced Approach and ACI EUROPE notes that this measure can be very effective in managing noise exposure at airports. ACI EUROPE has no specific comments on Condition 2.

#### 6) Condition 3 of draft RD

Condition 3 relates to the introduction of a voluntary sound insulation scheme. ACI EUROPE notes that there are existing insulation schemes delivered by Dublin Airport and that the introduction of a grant scheme for those affected by night noise as a result of the draft RD is complementary to these. ACI EUROPE does not propose to comment on the specific details of the Dublin Airport schemes as such insulation schemes differ from airport to airport depending on the airport and its regulatory regime, national and local building regulations, local planning regulations and zoning etc. ACI EUROPE would however comment on the importance of effective land-use planning for new developments around the airport to ensure that the airport does not become responsible for insulating properties newly constructed in the vicinity of the airport and to ensure that encroachment does not occur. This links back to our comments earlier on the draft NAO and how land-use planning is accounted for in the NAO.

In summary ACI EUROPE recognises the importance of defining an appropriate Noise Abatement Objective for Dublin Airport. The NAO should be based on objective and measurable criteria and the assessment of performance against the NAO should take account of each factor of the Balanced Approach. Where such factors are outside the direct control of the airport authority, this should be evident in the reporting of the NAO. One such example is land-use planning, which the airport has no direct control over.

ACI EUROPE supports the assessment of noise abatement measures under the Balanced Approach and that the operating restrictions should only be used where other measures cannot achieve the NAO. ACI EUROPE supports the general concept of the use of a Quota Count system to replace an aircraft movement cap, as it will encourage the use of quieter, more efficient aircraft at Dublin into the future. The removal of the very restrictive aircraft movement cap restriction and replacement with a noise performance-based restriction will support the recovery at the airport after the Covid-19 pandemic, enabling the aviation industry to build back better. However, ACI EUROPE feels that it is more appropriate to apply such restrictions to the core night period and not the full 8-hour period as proposed in the draft RD for the reasons stated above.

We are at your disposal should you wish us to clarify/further elaborate any of the above recommendations.