



By email to [feedback@heathrowconsultation.com](mailto:feedback@heathrowconsultation.com)

4 March 2019

Dear Sir/Madam

### **Heathrow Airport airspace consultation**

The Independent Commission on Civil Aviation Noise (ICCAN) has recently been established to act as a trusted and impartial voice on matters relating to aviation noise. Having been appointed late last year, as Head Commissioner I am now in the process of appointing other commissioners, and a secretariat to support us.

ICCAN has ambitious plans about the role we will play in the airspace change process in relation to the management of noise. We are already in the process of setting a strategic plan for our first year and, in due course, would welcome the views of Heathrow and all airports on where we might focus and prioritise our activity in the future, as we grow and begin to contribute more substantively to the issue.

In the Airports National Policy Statement (ANPS), the government suggested that Heathrow might have regard to any best practice guidance issued by ICCAN in relation to noise envelopes and runway alteration. Clearly, given the delay to our establishment, we are not in a position to offer that guidance as part of this consultation. In time, however, we intend to play a fuller role in providing guidance to Heathrow and other airports in relation to airspace changes.

Nevertheless, we wish to make a number of observations on the current consultation:

- in relation to your proposed noise objective, in principle we are in support, but we would want to see:
  - what specific activities the airport will undertake to achieve the objective
  - more measurable and specific details on how the airport can be held to account on its noise objective by the community
  - activities associated with achieving that objective prioritising a *reduction* in the effects of noise on health and quality of life, rather than simply limiting it
- in relation to directional managed preference, we understand that the airport would wish to adopt such an approach; however, we would expect to see clearly agreed principles about communication with communities and any extra communication for unplanned changes
- we welcome a longer time without night flights and would expect the airport to penalise airlines who breach night flight rules

- we expect the airport to minimise flights outside the proposed scheduled night flight ban; however, for those flights that do take place we would support all four measures – although a night quota system should be an absolute maximum and not a target

We recognise that your proposals will evolve as more detail is shared publicly and different options are considered. As Heathrow further develops its plans, ICCAN expects the airport to set out how the details of future operations and different use of existing runways:

- can aim to reduce overall noise
- will impact on different communities
- will be shared with different communities in meaningful ways
- will reduce out of hours flights – permitted and not permitted – including exceptions

In addition, ICCAN will want to see how the airport will:

- reduce the number of older and noisier aircraft using the airport and the numbers of flights from noisier aircraft
- set out the range of noise improvements that communities should expect to see from different options
- set out how new technology can reduce the impact of aircraft noise on specific communities
- ensure communities share in the proceeds of airport/air travel growth through, for example, home insulation, community projects, and local infrastructure/facilities

Our initial meetings with people from across the aviation sector have given us a good flavour of the issues, and in the coming months we will be meeting with many more from community groups, government, airports, manufacturers and others. A recurring issue is that of trust. We are already clear that one of ICCAN's primary aims will be to strengthen trust between airports and their local communities. This will rely on complete honesty and transparency on both sides – and we will be urging airports to ensure that commitments that are made during consultations are honoured. To this end, we expect the airport to be explicit in terms of how it will measure progress against the commitments to reduce noise, and clear in how it communicates its delivery against those commitments to the communities around the airport.

We look forward to a long and productive relationship with Heathrow and all airports across the UK, which will enable us to play a full and expert role in the management of aviation noise.

Yours faithfully,

**Robert Light**

**Head Commissioner  
Independent Commission on Civil Aviation Noise**