

ICCAN Corporate Strategy – Summary of responses

Overview

Rob Light, Head Commissioner of ICCAN

I would like to thank everyone who took time to provide feedback on our first Corporate Strategy.

It was very encouraging to receive over 100 responses. These comprised not only many individuals but also community groups representing residents, as well as airports, regulators, specialists, politicians and local authorities.

As a new organisation, we have spent much of this year engaging with people to better understand issues around aviation noise and hear as wide a variety of perspectives as possible.

These conversations helped to inform our Corporate Strategy and I'm delighted that most people think we have got our strategic objectives right.

My fellow commissioners and I have welcomed these comments and have taken on board the very useful feedback. This has shown a high level of concern over noise attitudes, particularly the research behind it that is influencing air space changes, and that noise should be considered and presented as a public health issue.

There is a real strength of feeling behind these issues, and the following report sets out how we intend to address them.

Equally, we have listened to some of the concerns raised, particularly around our plans to deliver an ambitious work programme. Again, my fellow commissioners and I have taken this on board and have looked at where we can re-prioritise our workplan so that we do not over-promise and are delivering early, or earlier than planned, on the issues of concern to many people.

These responses reinforce my belief that ICCAN has been established at a timely moment and that we are the organisation to drive forward change around the culture and management of aviation noise.

Summary of stakeholder feedback

We published ICCAN's first draft Corporate Strategy on Monday 20 May 2019, and asked for feedback on it, allowing a six week period for people to comment. The document set out the background to the organisation, what we have done since our establishment at the start of 2019, what we will aim to achieve, and what our priorities will be for 2019-2021.

Relevant stakeholders, including from the aviation sector and wider public, were invited to provide feedback, to ensure that ICCAN's work plan takes into account a range of views.

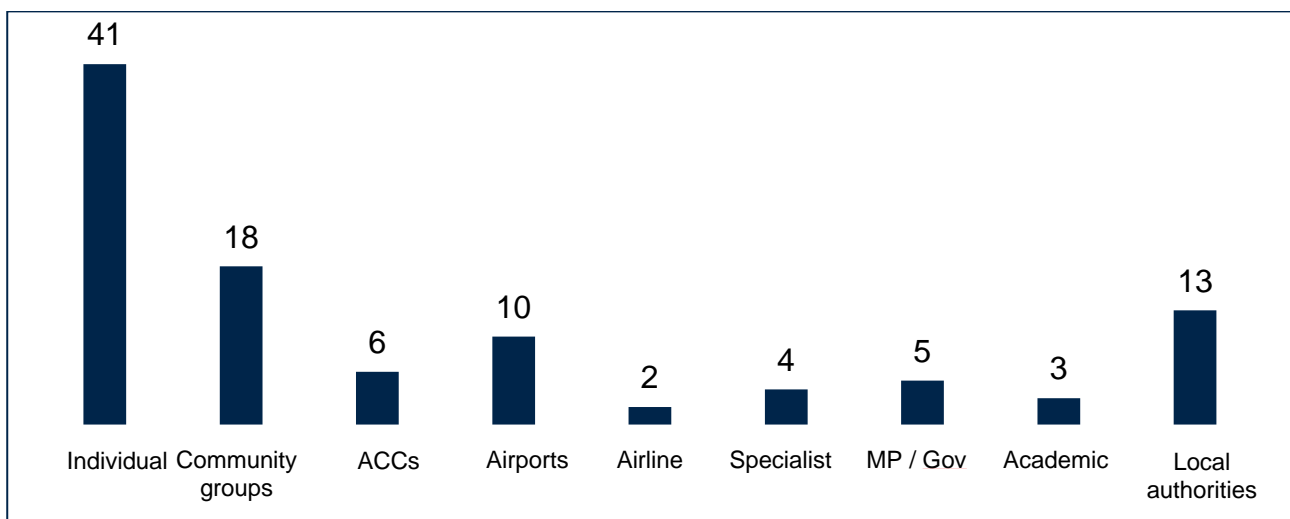
Emails containing links to the Corporate Strategy and an online survey (Annex 1) were sent out to around 1,000 stakeholders, including:

- Airlines
- Airports
- Airport Consultative Committees
- Community groups and representatives
- Department for Transport
- Local authorities
- Noise campaign groups
- Members of Parliament
- Regulatory bodies
- Specialists

We also publicised the publication of the draft Corporate Strategy, and the survey on it, on our social media channels.

We received 102 responses, 90 of which were via the online survey, and 12 via email or letter.

Numbers of responses can be further broken down by the following groups:



Feedback analysis

Each response we received was recorded and analysed, and considered by the ICCAN board when finalising the Corporate Strategy. Those who agreed to their responses being made public are published at [INSERT LINK].

We have summarised the key themes identified in the responses in the below report and highlighted suggestions for ICCAN. This included the following themes:

- Best practice
- Climate change
- Community perspective
- Health impacts
- Impartiality
- Noise measurement
- Noise metrics
- Noise research and attitudes
- Role of government & regulatory bodies
- Stronger powers
- Timeframe

Letters and emails

Emailed responses that followed the format of the online survey questions were logged as an online response. Written responses we received as letters were also analysed, summarised and are included in the report below.

Quantitative questions

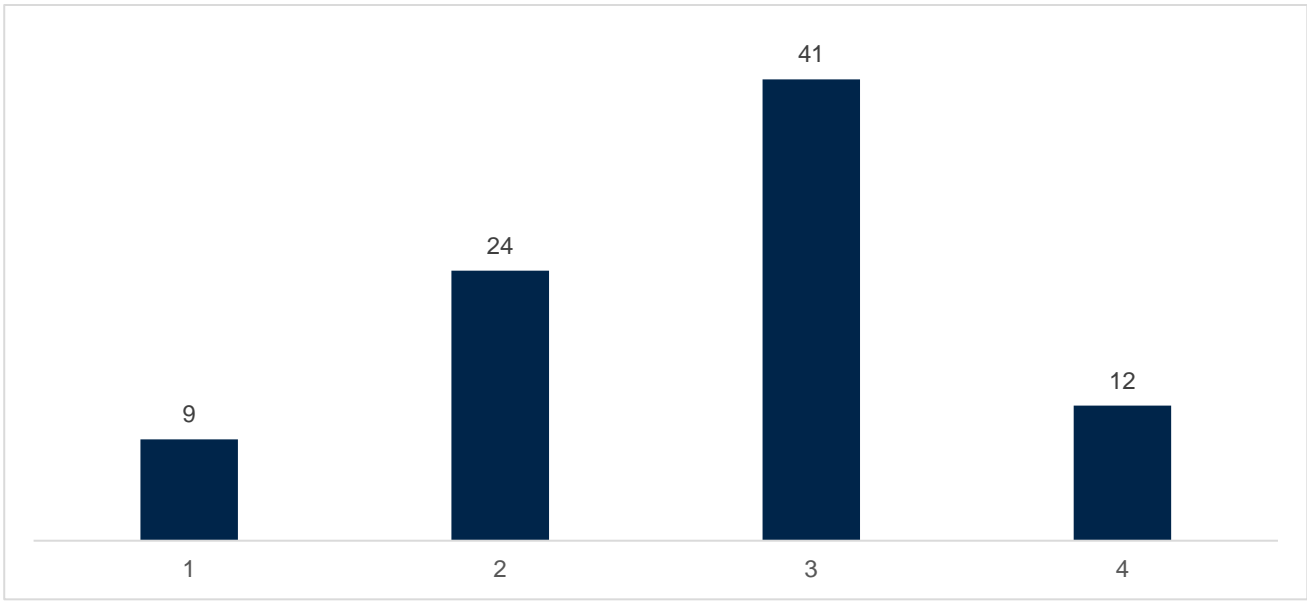
There were high levels of support for ICCAN's direction of travel, stated purpose and aims; over half of respondents said that ICCAN's Strategy addressed the key issues around aviation noise, three-quarters supported ICCAN's overall aim to improve public confidence and trust in the management of aviation noise, over half felt ICCAN had the right strategic objectives for the first two years, and the majority of respondents felt ICCAN had identified the right strategic objectives.

However, there were some respondents who did not support some aspects of the strategy; nine per cent thought that ICCAN did not address the issues at all, just under a quarter did not agree with the overall aim of improving public confidence and trust, just over a third did not feel ICCAN had the right strategic objectives and just under one-fifth felt that there were aspects of the strategy that were missing.

The quantitative responses are shown in the graphs below. We also asked qualitative questions to give respondents an opportunity to explain why they provided the scores that they did. We have summarised these responses in the next section to explore the reasons behind these scores.

As this report shows, people have strong opinions on the issue of aviation noise, and a number of suggestions for ICCAN were made by respondents. Where people suggested different activities that they would like ICCAN to undertake, we have considered these, and responded to them.

In your view, how far does the Strategy address the key issues around aviation noise?

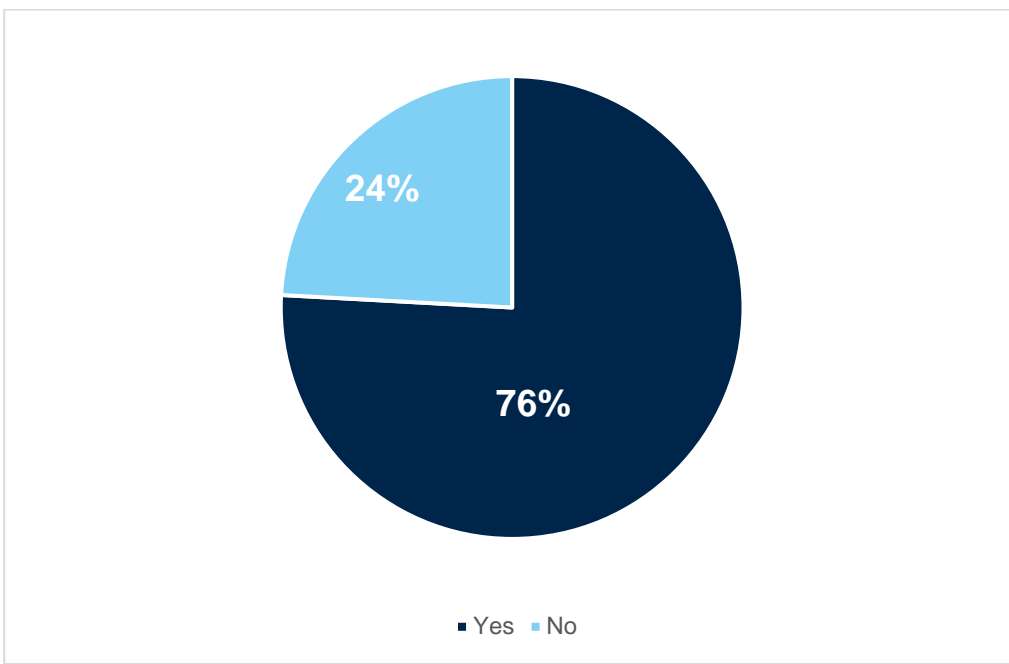


Each number above the chart represents the number of respondents who provided a numerical answer. Not every respondent provided an answer to this question

(Rating 1 = 'Does not address at all' to 4 = 'Addresses all key issues')

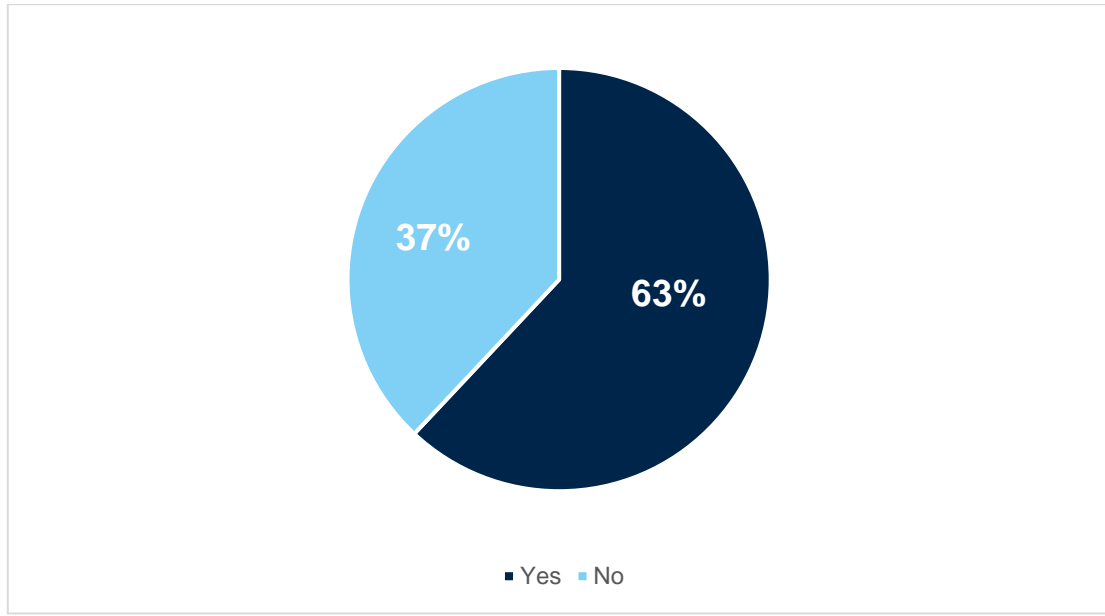
Do you agree with our overall aim; to improve public confidence and trust in the management of aviation noise?

(Yes or No)



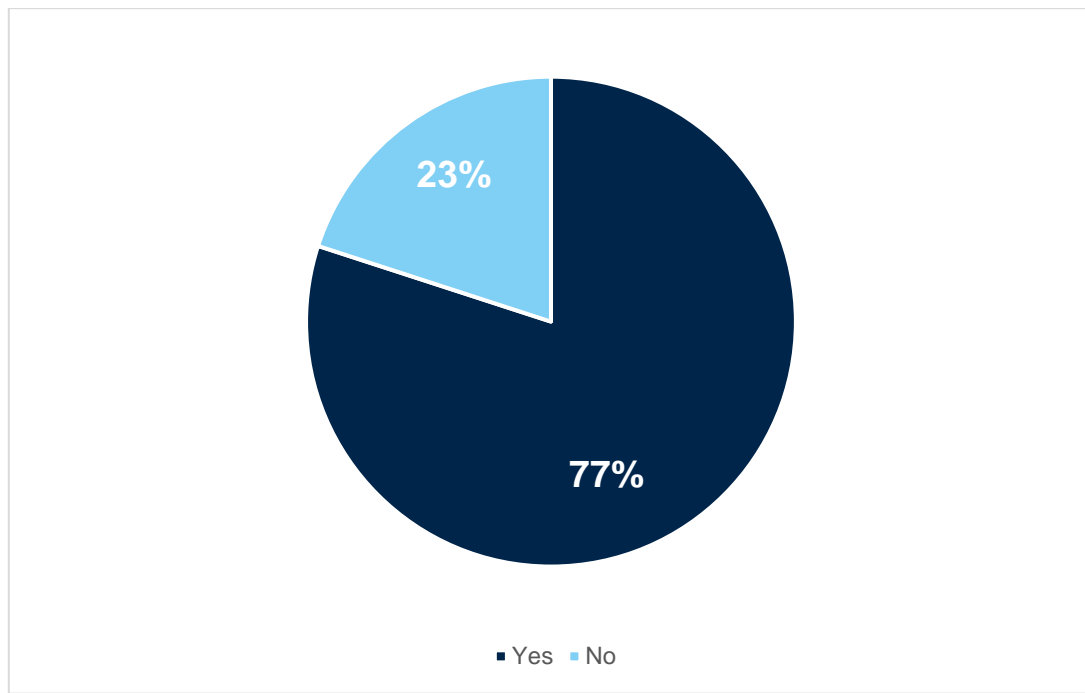
Have we got the right strategic objectives for our first two years?

(Yes or No)



Given ICCAN's remit, do you think there is anything missing from the strategy?

(Yes or No)



Qualitative Questions

We gave people the opportunity to explain or add comments to their responses. A further question was also asked:

- **What do you think of our plans for the first two years?**

The below summary covers responses we received to this question, and other comments people made in the survey.

Best practice

ICCAN’s role as an independent body places it in a good position to be able to document and promote best practice. This can incorporate many different topics to do with aviation noise, from community consultation and insulation schemes to guidance around noise impacts for airspace change sponsors.

There was support for ICCAN’s aim to consistently develop and maintain best practice principles on many subjects, as respondents felt this was a good opportunity for ICCAN to highlight the gaps where airports were falling behind. It would also provide a baseline for airports. However, we have also heard concern from regional and smaller airports that we take care to avoid applying a gold-standard approach in terms of scale and resource to all airports.

What was said:

“Compile best practice, focus on airports that are falling behind.” **(Airport response)**

“It would be beneficial if best practice guidance could be flexible enough to be able to accommodate emerging issues or opportunities.” **(Regulatory authority response)**

“Publishing new guidance on how airports should consult with their communities when planning airspace changes will be a useful tool that will provide both airports and communities with the confidence that the process is fair and transparent.” **(Airport response)**

“Progress needs to be monitored and shared.” **(Individual response)**

Feedback	Develop best practice guidance to ensure that airports have a blueprint to deliver consistently for their communities
Response	<p>We are committed to promoting and sharing best practice on a number of key issues such as community consultation, noise insulation schemes, on the airspace change process and in relation to the noise impacts of the CAA’s Post-Implementation Review process.</p> <p>Our best practice guidance will be sensitive to the fact that airports are of differing size, scale and resource; we will not be taking a ‘one size fits all’ approach to our best practice guidance.</p> <p>We are also keenly conscious of the potential for overlap and conflation of our best practice guidance on consultation with the CAA’s extensive CAP1616 Airspace Change decision-making process and will continue discussion with them on this issue.</p>

Climate change

The wider environmental impact of the aviation industry, particularly climate change, featured strongly in several responses with calls for ICCAN to acknowledge air quality and carbon emissions as a context to aviation noise. Given the drive to reduce carbon emissions by the UK Government and the aviation industry, respondents felt that ICCAN should make reference to climate change in its Corporate Strategy.

Furthermore, it was suggested that ICCAN should acknowledge, if not investigate, the links between carbon and noise reduction.

What was said:

“There is a strong correlation between aircraft noise and aircraft greenhouse gas emissions. ICCAN’s remit is limited to the former, but airspace-related noise abatement measures also have an impact on the latter.” **(Local authority response)**

“Whilst noise is key, we have to face the carbon emissions issue as a fundamental and overriding concern given the climate emergency.” **(Community group response)**

Feedback	ICCAN should acknowledge the impact of climate change on the aviation industry and how this links to noise.
Response	<p>We have included references to climate change in the Corporate Strategy and believe that aviation noise needs to be considered as part of wider environmental issues.</p> <p>We will be discussing with the Committee on Climate Change, and other experts in the field, the commonalities between our work, and also the tensions that might arise.</p>

Community perspective

Ensuring that communities are informed and engaged in conversations around noise was a common theme in the feedback. Many respondents wanted ICCAN to help simplify the technical language around noise so that we could help to facilitate a better understanding of the complex issues, particularly around the airspace change process.

It was also suggested that ICCAN should aim to look at things from a community’s point of view and ensure their voices are heard. Some respondents suggested ICCAN should perform the role of community group advocate or lobbyist.

Several respondents suggested ways in which ICCAN could help to ensure that the views of communities are heard. These included seeking out the less vocal and diverse communities impacted by aviation noise who often don’t engage in the issues, as well as ensuring the wider public are informed about the issues at hand.

What was said:

“Seek out the less vocal communities.” **(Local authority response)**

“Essential to summarise the key points in a way that ordinary people can understand and which have relevance to their experience of noise.” **(Community group response)**

“Consider how best to support communities in engaging with the airspace change process.” **(Community group response)**

“Communities need a champion. ICCAN should be that champion.” **(Community group response)**

Feedback	Make complex information easier to understand, consider noise from the perspective of the community and ensure that everyone has a chance to have a say.
Response	<p>Public understanding of the issues around noise will be key to ICCAN’s Communications Strategy and there is scope for us to share best practice examples around diversity and community engagement. Our research work will aim to seek out harder-to-reach communities around airports to understand their perspective.</p> <p>We are not, and will not be, a lobbying organisation, or represent communities over any others. To do so would impinge on our independence. We will treat all our stakeholders equally, supporting and challenging where appropriate.</p> <p>We recognise that local councils have the local democratic mandate to represent all communities affected by aviation noise.</p>

Health impacts

The impact of noise on people’s health was a common theme that appeared regularly throughout the feedback. Many respondents requested better evidence examining the links between noise and health, suggesting this was an area that needed more research.

There were numerous responses that suggested that aviation noise was having a very real effect on people’s lives and their health.

As a result, there was considerable support for ICCAN’s objective to review this, but a number of respondents suggested that ICCAN should prioritise this within the first year.

There was a real strength of feeling about this issue, with a wide range of representatives providing feedback on health.

What was said:

“Noise and health should be a year one objective and accountability around noise and health related issues should be explored.” **(Airport Consultative Committee response)**

“There needs to be better evidence on the links between noise and its impact on health to strengthen the policy basis for decision-making.” **(Regulatory response)**

“Research into effects of aviation noise on people’s health and general wellbeing / right to the enjoyment of life.” **(Community group response)**

Feedback	ICCAN should examine the links between noise and health as it is a serious issue impacting people’s lives.
Response	<p>We note the considerable support for promoting noise as a public health issue and are committed to delivering a literature review on the existing research. If we conclude that there are gaps in the available research then we will make a recommendation to government to carry out further targeted research.</p> <p>This is by nature a longer-term ambition, which involves significant research, scoping, and expert advice before recommendations are made. This will remain a priority over the first two years of our existence.</p>

Independence / impartiality

There was some concern raised about ICCAN’s independence with several respondents insisting it essential that the commission remain impartial otherwise any efforts to achieve credibility could be undermined.

It was felt that ICCAN could find itself being pulled in numerous directions if it didn’t assert its independence.

What was said:

“ICCAN must not fall into the trap of being a body that the communities see only as a facilitator of aviation growth, expansion and modernisation of airspace.” **(Community group response)**

“You must defend your independence.” **(Airport response)**

Feedback	ICCAN must remain impartial and independent.
Response	Independence is crucial to ICCAN’s success. As an independent body we are free to challenge everyone in a quest for better aviation noise outcomes.

Noise management

There was a strong sense of feeling that ICCAN should be responsible for the management of noise, suggesting that ICCAN’s main priority should be noise reduction.

Many felt that ICCAN could only be considered successful if it actively helped to reduce noise.

Several suggestions were made about how ICCAN could do this, such as by incentivising the industry to use quieter aircraft or promoting a taxation or points system for those that don’t; exploring mitigation schemes such as insulation; reviewing operational procedures such as night flights, flight paths; and by exploring the implications of concentration versus dispersal.

Several points were made about technology and how its implementation will help to reduce noise, with suggestions that ICCAN should be aware of these developments and what impacts they have.

Suggestions were also received about ICCAN becoming a noise watchdog or complaints commission.

What was said:

“Proposals for financial incentives, to promote quieter aircraft and less noisy flying.” **(Specialist group response)**

“Reduce aircraft use and prevent planes from flying over urban areas where the air and noise pollution is poor.” **(Individual response)**

“Research is needed over concentration and dispersal.” **(Individual response)**

“Explore opportunities that come with the development and deployment of new technologies.” **(Specialist group response)**

“Explain how people react to noise and what mitigation possibilities exist.” **(Airport response)**

Feedback	ICCAN should aim to reduce noise through incentivising or taxing the industry, promoting mitigation schemes, considering new technology or become a noise ombudsman.
Response	<p>ICCAN has been established to manage the effects of aviation noise. We do not, and will not, have a view on aviation growth or expansion. Expansion and growth is likely to result in increased noise for some. We will aim to ensure that the overall effects are reduced, and that decisions about expansion and changes to airspace are taken with communities, rather than imposed on them.</p> <p>Where noise can be reduced at source, we will investigate the most effective and meaningful way to do so. We are committed to reviewing operational procedures before the end of our initial two-year-term. By taking a considered approach, we will assess the key issues raised in the feedback as mentioned above.</p> <p>We are also committed to reviewing the performance and consistency of the airports’ approach to noise insulation and provide guidance on best practice.</p> <p>Incentivising is an issue that will be considered as part of further regulatory conversations.</p>

Noise metrics

Feedback indicated there was a lot of support for ICCAN’s proposal to review noise metrics. This includes the measurement and presentation of noise acoustics, with a particular focus on how to explain noise in a clear and digestible manner.

What was said:

“ICCAN should provide an opinion on consistency in the use of noise metrics.” **(Local authority response)**

“Other objectives, such as looking at the consistency of noise metrics, is probably the most valuable.” **(ACC response)**

Feedback	Review existing noise metrics and help to explain noise in a clear way.
Response	We are committed to producing an opinion on consistently in the use of noise metrics by April 2020.

Noise research and attitudes

There was also a high level of support for our intention to review the measurement of attitudes towards noise (including SoNA and WHO/EU guidelines), with numerous respondents questioning whether SoNA was the right tool of measurement on which to base decisions about future airspace changes. However, the Government stated that we should postpone our consideration of SoNA in light of further analysis being done on the data this year.

What was said:

“Form a view on SoNA, aircraft heights and provide tangible benefit to the communities.”

(Individual response)

“It may also be fruitful for the Commission to review the WHO annoyance relationship, alongside its consideration of SoNA.” **(Academic response)**

Feedback	Review the measurement of attitudes towards noise including SoNA.
Response	We note the clear strength of feeling around SoNA and the complexity of existing noise metrics. We have said that ICCAN will undertake a review of SoNA and recommend what future research on noise attitudes should look like, along with suggested timescales for completing and repeating an updated study.

Role of government & regulatory bodies

Questions were raised about ICCAN’s position within the aviation industry and how it can enable regulatory change at either a local or national level.

There was support for the exploration of the relationship between noise and planning with suggestions made that ICCAN could provide opinions on noise for environmental statements and explore the relationship between noise metrics and the planning system.

It was also suggested that ICCAN could use its position to review existing aviation policies or call for more regulatory powers.

What was said:

“ICCAN should provide clear guidance as to how noise metrics relate to the planning system and encourage the Government to establish thresholds at which noise-sensitive development is inappropriate.” **(Local authority response)**

“A review of existing policies and powers will, in our view be an essential part of effective noise management.” **(Specialist group response)**

“ICCAN should influence government to take airspace modernisation more seriously in order to deliver some tangible benefits to communities.” **(Airport response)**

Feedback	How can ICCAN enable change at a local or national level and improve the landscape around planning and aviation.
Response	We will continue to gather evidence and review the relationship between the planning system and aviation noise issues, providing advice where required and considering ICCAN’s future role in this area as part of our overall look at regulation.

Stronger powers

A number of responses highlighted the need for ICCAN to have stronger powers to enable enforcement or regulation if it is to deliver any successful outcomes. Many respondents felt that an independent body having regulatory powers around aviation noise would be beneficial to ensure compliance or be in a position to incentivise or penalise noisy airlines.

What was said:

“ICCAN should have stronger powers of enforcement in relation to noise measurement, mitigation and compensation measures.” **(Local authority response)**

“There should be a stronger remit with reviewing the regulatory framework around airspace changes in order to deliver noise improvements sooner.” **(Airport response)**

“We would like to see ICCAN as a statutory body.” **(Community group response)**

“The one objective that would make all the difference would be if you could attain a status that gives you the power to enforce.” **(Individual response)**

Feedback	ICCAN should have enforcement powers to ensure it can enable change
Response	<p>While we note the concern regarding ICCAN’s position as an advisory body and the desire to see us develop stronger powers to help better regulate the impact of aviation noise, ICCAN will make independent, evidence-based recommendations which it will expect the government and others to take seriously and act on.</p> <p>Given comments on timescales and ambition (see below), and in light of many other activities occurring in the aviation world (notably the Aviation Strategy, airspace modernisation, and general expansion and growth around the country), we will bring forward our opinion on the future of regulation and enforcement of noise issues in the UK, to September 2020 (from our intended April 2021 two-year review point). This is the earliest that we believe we can realistically and achievably take a view on the regulation. This piece of work will also encompass the issue of planning and land use.</p> <p>We recognise that a full review of regulation and enforcement will take time but will look to bring forward key aspects of our work, particularly around enforcement, within the first 12 months of our strategy going live.</p>

Timeframe

Several respondents, notably including the Government, expressed their concerns about ICCAN's ability to deliver its objectives within the two-year timeframe. Questions were posed about whether we should prioritise key pieces of work to ensure that we delivered on our objectives and did not damage our credibility.

There were also some respondents who felt that the timeline of activity was not quick enough and that we should deliver action at a swifter pace.

Some respondents advised that it was important not to overpromise and underdeliver.

What was said:

“Offer some flexibility on the actions, as I fear that some may need more time than currently planned.” **(Academic response)**

“Do not overpace as the public needs time to understand the issue.” **(Airport response)**

“The timeframe is too slow - action is needed quickly.” **(Community group response)**

Best practice guidance should be delivered quicker.” **(Individual response)**

Feedback	ICCAN should be wary of trying to do too much in the two-year timeframe but must also deliver results quickly.
Response	<p>We have noted this feedback and have reviewed our two-year objectives to ensure that we can fully deliver on our targets. We are determined that ICCAN will become an organisation that makes evidence-based decisions that achieve the right long-term outcomes. To do so, we must be confident the evidence we use is both comprehensive and robust so will not rush to make decisions lightly.</p> <p>However, we do note the desire for change so will work to fully deliver on our goals. We have re-prioritised some of our workplan, set out in the Corporate Strategy, to ensure we do not over-promise but yet are delivering early, or earlier than planned, on the issues of concern to many people (for example, the review of SoNA, and an opinion on regulation).</p>