

## Response ID ANON-6AJS-RJMA-X

Submitted to **Minimum Requirements for Noise Modelling Consultation**

Submitted on 2020-03-04 23:55:57

### About you

#### 1 Are you responding in an official capacity on behalf of an organisation?

Yes

#### 2 If yes, please tell us its name.

If yes, please tell us its name.:

Independent Commission on Civil Aviation Noise

#### 3 What is your name?

Name:

Sam Hartley

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#### 5 Do you consent to your response being published?

Yes, with personal identifying information (name, organisation, respondent category, location, additional information - please note your email address will NOT be published if you choose this option)

### Overriding criteria

#### 6 What are your views on the CAA's proposed no decrement and no radar criteria for noise modelling?

Agree

Please explain your answer and provide any other general comments.:

We agree that proportionality should be the overriding factor in this context. However, in common with our other later comments, we would look to airports and airfields to show how they are operating and offering above and beyond the statutory or regulated minimum, in order to show their commitment to their local communities.

Please note that this, and the remainder of our response to this consultation, reflect the views of ICCAN at the time of writing. We are planning forthcoming publications on noise metrics and measurement; consultation and engagement on airspace change; and planning, regulation and enforcement among, others. Work on these issues, as well as with the Government on its aviation strategy, and future research and surveys on annoyance, health and wellbeing, is ongoing. It is entirely possible that our views on the matters consulted on will evolve in time based on our work and engagement.

### When an airport is designated for noise by the Secretary of State

#### 7 What are your views on the CAA's proposals for noise modelling at airports designated for noise by the Secretary of State?

Agree

Please explain your answer and provide any other general comments.:

In the context of the current arrangements for designation, we agree that designated airports must model at category A standard. In order to maintain and enhance public confidence in the management of aviation noise, it is imperative in these circumstances (as a minimum) that the CAA has direct access to the raw collected data.

### When a sponsor wants to change the design of civil airspace

#### 8 What are your views on the CAA's proposals for the noise modelling Category required for assessment of options and consultations for Airspace Change Proposals?

No strong feelings either way

Please explain your answer and provide any other general comments.:

Unfortunately the consultation response options do not allow the choice of 'neither agree nor disagree', which better categorises ICCAN's response to this question than 'no strong feelings'. We recognise that airspace change proposals are contentious issues, which can have both beneficial and detrimental effects on local communities. While we recognise that simply mandating a minimum and hard threshold at which airports must alter their modelling category would be a

blunt tool, and might lead to manipulation of the assessment of number of people affected, we have reservations about the level of incentives for airports to move to the next model if their airspace change is likely to pass the recommended threshold. If implemented, we would like to see real examples of where airports voluntarily move to higher categories of noise modelling to show communities their commitment to trusted, transparent and robust noise data.

**9 What are your views on the CAA's proposals for the forecast period over which this aspect of the call in criterion is assessed?**

Agree

**Please explain your answer and provide any other general comments.:**

We generally agree that the timescale proposed is not unreasonable.

**10 What are your views on the CAA's proposals for the noise modelling Category required for call in assessment?**

No strong feelings either way

**Please explain your answer and provide any other general comments.:**

The Government has proposed a potential role for ICCAN in giving expert advice to the Secretary of State on called-in airspace change proposals. We therefore do not consider it appropriate to comment on the noise modelling approach required for the call in assessment.

**11 What are your views on the CAA's proposals for assessing whether a proposed change has an identified adverse impact on health and quality of life for the purposes of assessing criteria for call in by the Secretary of State?**

No strong feelings either way

**Please explain your answer and provide any other general comments.:**

Please see our previous answer relating to call-in assessment.

**When an ANSP wants to change an ATC operational procedure and the proposal meets the criteria for a 'relevant PPR**

**12 What are your views on the CAA's proposals for noise modelling at airports applying for a planned and permanent redistribution of air traffic?**

Agree

**Please explain your answer and provide any other general comments.:**

We agree that the approach should be consistent with airspace change proposals, with the caveat that our other comments on ACPs also apply.

**When there are changes to the operational use of the civil airspace around an airport**

**13 What are your views on the CAA's recommendation the noise modelling at airports whose traffic has changed in line Direction 15?**

Agree

**Please explain your answer and provide any other general comments.:**

We agree that the standards set in the CAP1616 guidance in relation to communicating and engaging with local communities on noise impacts of airspace changes should be consistent with those used by airports for Direction 15 changes. Our forthcoming best practice toolkit for airspace change consultation would equally provide assistance on this matter.

**When an airport submits a planning application for a development where the CAA is a statutory consultee**

**14 What are your views on the CAA's proposals for noise modelling at airports applying for planning consent for a development where the CAA is a statutory consultee?**

Agree

**Please explain your answer and provide any other general comments.:**

One of the priority areas that ICCAN is considering in its first two years is the planning regime and we have noted the challenges of preparing for, consulting on and designing planning applications that will be dependent on airspace changes, without those airspace changes themselves being designed and consulted on, let alone considered and approved. In that light, bringing a measure of consistency to the modelling used between the two is to be welcomed.

**Transition arrangements**

**15 What are your views on the CAA's proposals for transition arrangements?**

Agree

**Please explain your answer and provide any other general comments.:**

While we accept that proportionality is a relevant factor for this question, especially in cases where airports have already begun an ACP, PPR or planning application, we would urge the CAA to apply strict criteria to its assessment of size of the transition period in these cases, and judge it against the fact that any existing application is often likely to be in the interests of the airport involved. Therefore, in common with our other responses to this consultation, airports should

be encouraged to show their communities they are going above and beyond the regulations, directions or guidance issued.