

# Response ID ANON-2BK2-MUCS-9

Submitted to **Proposed Criteria for Assessing and Accepting the Airspace Change Masterplan**  
Submitted on **2020-06-25 13:53:10**

## Introduction

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

Yes

**Other:**

Independent Commission on Civil Aviation Noise

### 2 What is your name?

**Name:**

Sam Hartley

### 3 What is your email address?

**Email address:**

contacticcan@iccan.gov.uk

### 4 Are you answering as:

Other

**Organisation:**

Advisory body

### 5 Where do you live or where is your organisation based?

South East

### 6 Is there anything else that you would like us to know in connection with your response?

**General:**

### 7 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(name, organisation, respondent category, location, additional information – please note your email address will NOT be published if you choose this option)

### 8 CAP 1887 details the proposed criteria to be used to inform whether to accept the Airspace Change Masterplan, which is being created by the Airspace Change Organising Group (ACOG), an impartial team in NERL. Do you have any general comments you would like to share on the proposed criteria for assessing and accepting the Airspace Change Masterplan?

**Overview:**

We are responding to the consultation as it was intended when the CAA prepared and launched it in February 2020 and, as such, does not reflect the impact Covid-19 is having on the aviation industry. Given this, we would like to see the Masterplan and the airspace change process evolve to reflect the impact of the pandemic and the emerging situation of the next few years. It is important that, as the expert and impartial advisor on aviation noise matters in the UK, the Independent Commission on Civil Aviation Noise, is involved in those conversations as new processes and proposals are agreed and implemented. Since our formation we have engaged extensively with local communities impacted by noise, listening to their concerns and building trust, which has helped us to develop a thorough understanding of the noise landscape within the UK. Our impartiality and ability to represent the voice of communities means that our involvement can enhance the development of the Masterplan process.

ICCAN supports airspace modernisation as, in theory, it presents an opportunity to reduce noise for the benefit of those most affected. Since being established in 2019, we have built a strong working relationship with both the CAA and ACOG and would like to strengthen this through the further development of the Masterplan. We would welcome the opportunity to be involved in any future conversations about how noise can be better addressed within iterations of the Masterplan, airspace change and the trade-off criteria. It is important that recommendations and advice from the Independent Commission on Civil Aviation Noise are taken on board and adopted as part of the Masterplan process.

Given the particularly complex nature of the FASI-South airspace programme we feel that communication around the Masterplan and airspace modernisation needs to be as clear and transparent as possible. We do not feel that the information in this consultation would be clear enough for a wider audience or anyone without a knowledge of aviation, so better communication and engagement around the Masterplan itself will be required. The proposed airspace roadmap, setting out the timeline of proposals and deployment modules, should be developed with this in mind.

There also needs to be a strong plan put in place so that people who are going to be potentially impacted by new levels of noise exposure know about the Masterplan and, even more importantly, know how to have their say before any life-changing decisions are made. Whether this be during the ACOG public

engagement exercise or the Stage 3 consultation process, simple communication about the process must be clear.

Airspace changes listed within the programme must set out what benefits they will bring and what the timeframe for delivering these will be to realistically manage expectations; for example, if the benefits are a reduction in stacking and delays or the introduction of new technologies not due to be implemented for a number of years, this needs to be clearly set out so people understand when they will feel the benefits. We would want the co-sponsors to make minimising or reducing any noise impacts a key part of any decisions.

The document states that dependencies between airspace changes will mean that ACOG must resolve conflicts and work with sponsors to amend the design of those proposals. We would like to see a set of criteria established which sets out how those trade-offs and conflicts are managed and decided upon and where noise would be placed within that. It is our view that noise must be considered among the highest decisive factors and would like to see how these criteria are weighted. These need to be transparent and simple, so the public can understand what is being proposed.

While it is important that sponsors work with each other on this, it is essential that those local communities who will be impacted by trade-offs are identified and brought into the conversation. Transparency around this is vital and there needs to be clear explanations around what the trade-offs will mean for those potentially impacted. People must be able to understand how one issue is weighted against another and what this means in practice as they need to be able to understand the decision, even if they don't agree with it.

We would like to see some joint engagement between sponsors and those impacted communities to ensure that their concerns are addressed as part of the trade-off decision-making process, so that assumptions are not made on their behalf.

The decision-making process around trade-offs and conflicts needs to be fully transparent to avoid any potential future challenges and must have been addressed sufficiently with those impacted communities by the time Stage 3 consultations are live.

We would support, where possible, dependent sponsors working to the same timeline so that any engagement / consultations can be done in a coordinated way to avoid any unnecessary confusion from the public about what they are being asked to respond to.

## **9 Are the proposed criteria detailed in CAP 1887 the right criteria to enable acceptance?**

Minor modifications needed

### **Criteria:**

We would like to see noise as a key factor in the decision-making progress used by ACOG and sponsors when deciding how to resolve conflicts and dependencies.

## **10 Chapter 3 of CAP 1887 details the policy considerations that are relevant to the Airspace Change Masterplan. Are there examples of where further policy may be required to guide trade-off decisions?**

Yes

### **Policy:**

ICCAN is currently undertaking work in a number of areas that could be relevant to policy in the future. This includes a review on the use of noise metrics, delivering a toolkit for airspace change consultation, developing a new attitudinal survey to examine people's attitudes to aviation noise, as well as better understand its impact on health, well-being and quality of life.

As we produce and publish this work we will share our findings and recommendations with the CAA and ACOG, and hope that these will be considered at that stage of the Masterplan development process.

## **11 Chapter 4 of CAP 1887 details the engagement expectations for the Airspace Change Organising Group (ACOG) to undertake. Do you have any comments on the engagement we are asking ACOG to undertake?**

### **Engagement:**

The wider public engagement exercise to discuss the trade-offs and potential solutions is crucial as the public will need to have a say on these decisions and fully understand the noise implications of the proposals. As design principles are discussed and agreed by stakeholders in Stage 1 of CAP1616, the trade-off / conflict process could be done in a similar fashion so that all the information is fully considered by those impacted communities.

As with CAP1616, all this engagement work must be done transparently so the outcomes and decisions of these exercises must be available for the public to review before the third iteration of the Masterplan and the agreed dependent changes are published.

We do not want to see airports diluting the amount of engagement or consultation they are undertaking with their local communities due to the pandemic. Keeping lines of communication open is crucial, particularly now more than ever, so that trust doesn't break down. The level of trust between airports and their communities will be a key factor for the successful delivery of airspace change as we anticipate that public awareness around aviation noise will increase with people becoming much more noise sensitive in the coming years.

Given the current impact of Covid 19 on more traditional engagement methods such as public meetings and forums and considering the geographical constraints of airspace modernisation, online methods should be considered to ensure better reach and engagement with impacted audiences.

We are currently looking at how airports can continue to engage effectively on noise, particularly by adopting new innovative technologies and methods, looking specifically at Stage 3 consultations under the CAP1616 process, as well as more wider engagement practices. We have already been, and are happy to continue, sharing our findings on both aspects with ACOG as they design the Masterplan.