# Future of Aviation Noise Management – Case for Change

## Consultation and engagement

### Summary

Aviation noise is a technical, complex and subjective subject, so it is important that impacted communities have the right tools to help them understand and engage effectively with airports about the everyday and future noise issues that might affect them. Without the right mechanisms in place, there is a risk of misunderstanding and misinterpreting each other's views, which over time can cause distrust to form. In addition, the current available information around noise can sometimes be difficult to comprehend without a technical background in aircraft operations/air traffic control/airspace management, and this potentially prevents people from having a full understanding of why changes are proposed and/or their potential impacts.

The Independent Commission on Civil Aviation Noise (ICCAN) is seeking to minimise the level of distrust between impacted communities and airports and improve the way people are identified, approached and included in consultation and engagement activities. With this in mind, ICCAN has published best practice on engagement that provides a basis for airports to form closer and meaningful working relationships with communities and other stakeholders.

We also aim to improve the information made available to people when consulting on airspace change, ensuring that the technicalities of noise and its impacts are communicated clearly. ICC AN has produced a toolkit to complement the Civil Aviation Authority (CAA's) CAP1616 guidance and to offer practical ideas as part of public consultation (ICCANa, 2020; CAA, 2020).

### Key issues

### Lack of trust in engagement

#### Concerns
A lack of continuous and effective engagement between airports and impacted communities can lead to distrust, often resulting in fractious relationships and in-built opposition to any operational change or future development proposals the airport might seek to deliver.

#### Improvement opportunities
Encouraging a closer, more open and continuous working relationship between airports and impacted communities to restore trust at different levels could help to repair this. This could result in productive two-way conversations, an improved working relationship and better outcomes for all parties.

### Resources in managing the relationship between communities and airports

#### Concerns
Difficult relationships between impacted communities and airports can be resource intensive, requiring more staff time and attention as they potentially deal with additional requests, complaints and concerns. Given the impact of Covid-19, there may be considerably less resource available to help manage and maintain relationships with impacted communities.

Publish relevant guidance for airports according to their size and scale, which could provide them with new ideas and tools to help them manage and build better relationships with impacted local communities.

## Lack of clear information as part of consultation

Concerns

A lack of information on new flight paths and the potential noise impacts prevent people from having a full understanding of the proposals. This denies them the chance to have a meaningful say on the proposals as they are not able to give considered feedback.

Improvement opportunities

Greater clarity on the information and technical terms used in reports can allow the public to better understand the situation and provide feedback.

## Identifying impacted communities

Concerns

Without fully identifying who is going to be impacted by airspace changes, key audiences - particularly those considered to be from seldom heard sections of the community   are left without a voice and a chance to represent their views on proposals that might have a damaging impact on their lives.

Improvement opportunities

To develop a better understanding of who might be impacted by the proposals, demonstrating that an airport has made every effort to ensure that seldom heard groups have received the proposals and have every chance to respond.

# Supplementary information

## Lack of trust in engagement

### Concerns

Without effective engagement structures in place to help improve trust, impacted communities might not feel like they are being heard or have a voice to help shape decisions that impact their lives. Without effective mechanisms for engagement, people might not understand how they are being impacted by aviation noise and what rights they have to engage or challenge.

Continued distrust could result in a breakdown in communication between impacted communities and airports. If not addressed then airports will find it harder to operate, as they will be faced with opposition in the form of residents who could publicly oppose future proposals, such as airspace change and expansion, or even everyday operations through the addition of extra noise complaints by forming oppositional campaign groups. Existing engagement mechanisms are in place, such as Airport Consultative Committees (ACCs) and noise forums, but in the former's case, noise does not always feature prominently and for the latter, some existing forums are in a delicate position as they are undergoing or have undergone reviews to ensure they have a clear purpose and objectives.

### Current approach and limitations

Each airport is required to have an ACC under the Civil Aviation Act 1982, and although the government does provide guidance, it is not prescriptive as to the numerical size a committee should be, whether it has an independent chair, who is invited to sit on it and why, or what should be discussed at each meeting (DfT, 2014). That is for the committee to decide. While they are expected to generate constructive conversation between the airport and various parties, committees do not have any executive power, but can propose recommendations.

There is guidance in the aviation policy framework that sets out engagement expectations for airports including that:

- At all airports, the key principle should be that airports act as good neighbours so that local communities have confidence that engagement processes are effective, that the airport is honest about its noise impacts and is willing to challenge its own performance.
- The government expects all airports to communicate openly and effectively with their local communities about the impact of their operations (UK Government, 2013).

### Opportunities for improvement and challenges

While we can identify and present mechanisms that could be used for rebuilding trust and reducing the resource spent on managing challenging relationships, each airport will only adopt the methods that they decide to be the most appropriate and applicable. We can only provide information and advice in this area, as it would be difficult to prescribe engagement mechanisms as airports will be operating under different individual circumstances. We can review whether airports have adopted our recommended processes, but it would be hard for us to enforce.

## Resources in managing relationship between communities and airports

### Concerns

Managing relationships with impacted communities can be quite resource intensive for an airport as it can often require a lot of time and attention responding to requests for information, dealing with complaints, or setting up meetings or forums to address specific issues or areas of contention. This could result in time and effort being drawn away from entering into effective engagement with other audiences, such as seldom heard groups, or people who do not have a regular line of communication with the airport.

This is a particular concern in light of Covid-19 as the resources usually dedicated to engagement are likely to have been impacted. With the current financial strains, there is a possibility that staff absence could result in a knowledge gap for community engagement, further adding to the issues of developing and maintaining relationships.

## Current approach and limitations
Due to the Covid-19 pandemic, some existing engagement activities used for maintaining and developing relationships, such as events and meetings are not possible to deliver in person. Although these mechanisms can and have been shifted online, they do have limitations, especially for those who might not have readily available access to the internet.

Some airports might also be communicating with their impacted communities less frequently due to the downturn in aviation levels and as a result of staff absence.

## Opportunities for improvement and challenges
ICCAN has issued best practice guidance to help airports identify more effective and efficient ways of communicating and managing relationships with impacted communities, taking into consideration the impacts of Covid-19 on airport resource and budget Additional support or further guidance could be produced to help airports deliver on ICCAN's recommendations. Guidance could also be produced to help airports understand the expectations that communities have.

## Lack of clear information with respect to consultation

### Concerns
People may not fully understand the noise impacts that new flight paths will have on them, so will not be in a position to provide a full, informed response. This could impact people's quality of life as they might be exposed to aviation noise for the first time and feel that they were unaware of this change and were not presented with an opportunity to object and respond.

### Current approach and limitations
When consulting on airspace change, airports must follow the CAA's CAP 1616 guidance (CAA, 2020). Given most airports are not public bodies, they are not required by law to produce an Equalities Impact Assessment – something required by public bodies such as local authorities and NHS providers. This means that they may not fulfil the same obligations as other organisations who form part of our national infrastructure.

When undertaking formal consultations, airports, like all other organisations, should adhere to the 'Gunning' Principles, which are accepted as being good practice when conducting public consultations. These have also formed the basis for legal challenges (including judicial review) when it has been felt that the consultor has not been able to achieve the required standard that these principles define.

### Opportunities for improvement and challenges
The CAA have supported us in the development of a toolkit that provides best practice advice on how to consult under the CAP 1616 process and have agreed to assess whether our advice has been applied by airports (CAA, 2020; ICCANb, 2020). Ultimately, it is the CAA which will determine whether or not our advice is being adopted and adhered to by airports and other airspace change sponsors. ICCAN will work with the CAA on any future changes or improvements to the guidance.

**Identifying impacted communities**

Concerns

There is some concern that for some seldom heard communities might not be aware of airspace change proposals or the impact it might have on them. If they are unable to voice their concerns and are left exposed to aviation noise, it could detrimentally impact their quality of life.

Current approach and limitations

The CAA's CAP1616 guidance does provide some advice on how seldom heard audiences should be considered as part of the consultation planning process, but does not give any practical advice on how to ensure this is done appropriately.

Opportunities for improvement and challenges

ICCAN has published its best practice on engagement that provides a basis for airports to form closer and meaningful working relationships with communities and other stakeholders (ICCANb, 2020). With proper engagement, it enables an airport to be more transparent and make effective decisions based on mutual understanding. Better engagement will also enable people to be aware of the how and why decisions have been made.

# Appendices

## Appendix I: Legislation

Civil Aviation Act 1982

This act sets out the primary duties and functions such as air transport licenses and exercisable power for the CAA. It also includes the regulation of civil aviation, air transport operations and air navigation services.

# Appendix II: Policy

Aviation Policy Framework

The current Aviation Policy Framework was published in 2013 and is due to be updated by a new aviation strategy. It sets out the government's overall objectives for aviation and the policies government would use to achieve these objectives. This Framework has two core principles: collaboration and transparency. The Framework covers the following areas: (1) Supporting growth and benefits of aviation; (2) Managing aviation's environmental impacts, such as climate change and noise pollution; (3) The role of the Airports Commission; (4) Other aviation objectives, including: protecting passenger' rights; competition and regulation policy; airspace; safety; security and planning (UK Government, 2013).

# Appendix III: References

CAA, 2020. Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information. [Online]
Available at:
https://publicapps.caa.co.uk/docs/33/CAP1616_Airspace%20Change_Ed_3_Jan2020_interactive.pdf
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ICCANa, 2020. Toolkit for consulting on airspace change. [Online]
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https://iccan.gov.uk/wpcontent/uploads/2020_12_02_ICCAN_Best_Practice_Engagement.pdf
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UK Government, 2013. Aviation Policy Framework. s.l.:The Stationary Office, © Crown copyright 2013. [Online] Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/153776/aviation-policy-framework.pdf [Accessed 28 01 2021]