

## ICCAN SURVEY ON THE FUTURE OF AVIATION NOISE MANAGEMENT GACC RESPONSE

1. Do you agree with our emerging view on the future of aviation noise management, and the role ICCAN should play?

*Yes, in part*

2. Please could you provide a brief explanation for your response?

*We agree that ICCAN should have statutory status.*

*However, ICCAN's proposals do not address critical weaknesses in the UK's existing aircraft noise management arrangements. Those weaknesses are primarily twofold. First, the absence of an effective policy framework for aircraft noise, including the lack of noise reduction targets. Existing policy is opaque and has become a licence for inaction. Secondly, the absence of effective policy enforcement mechanisms. Together these have created the current aircraft noise regulatory vacuum. Because ICCAN's proposals fail to address these weaknesses, they are inadequate and will not in our view improve noise management in the ways required.*

*We are particularly surprised that ICCAN considers that current regulators (CAA, government, local planning authorities) should retain their existing enforcement roles when there is extensive evidence that current enforcement arrangements are not fit for purpose. At Gatwick for example there are currently no arrangements for proposed main runway growth to be scrutinised and consented and noise regulation is weak, disjointed and not well enforced as a recent review of the airport's Noise Action Plan has shown. In our view enforcement arrangements need to be strengthened very substantially.*

*For the same reasons, ICCAN's proposals do not meet the core tests set in its own Emerging View document, that "there [should be] a clear single and empowered voice ... at the heart of decision-making" and that "... future policy and regulatory systems for managing noise are fit-for-purpose". Its proposals would not, as we understand them, achieve an empowered entity at the heart of decision-making, merely a further advisory body, and would leave the current ineffective policy and regulatory arrangements unchanged.*

*ICCAN should amend its proposals by:*

- a) Asking government to clarify and strengthen aircraft noise policy (see answer to the next question)*
- b) Recommending that the current regulatory vacuum is replaced with robust, statutory, regulation of aircraft noise by an empowered regulator that is independent and expert. This should include powers to*

*intervene where organisations have breached targets or policies and to fine organisations, in line with the Airport Commission's advice.*

- c) *Proposing substantial interim strengthening of enforcement arrangements pending the permanent change suggested in (b) above. This should include:*

*(i) at all major airports including Gatwick, DfT (or a body appointed by DfT) taking proactive lead responsibility for the regulation of aircraft noise using the extensive statutory powers available to it; and*

*(ii) at smaller airports, DfT requiring a lead body to be nominated to take responsibility for ensuring that strengthened noise policy is met in all respects.*

3. Do you agree with our draft vision to make the UK the world leader in managing aviation noise?

*No.*

4. Please could you provide a brief explanation for your response?

*The draft vision has no practical meaning or relevance to people adversely impacted by aircraft noise. The term "managing noise" has become increasingly associated with industry initiatives that give the impression of constructive activity but which are ineffective in achieving meaningful noise and noise impact reductions.*

*Instead ICCAN should seek to achieve the three overarching outcomes set out below.*

*First, that all reasonably practical measures to reduce aircraft noise emissions, exposure and impacts are expeditiously implemented nationally.*

*Secondly that a fair balance is achieved between the interests of the aviation industry and of people adversely affected by its operations including that growth is equitably and proportionately balanced by reductions in noise and other environmental impacts or, in any circumstances where that cannot be achieved, by the provision of equivalent alternative compensatory noise and other benefits, taking account of local circumstances.*

*Thirdly that the above factors are reflected in ambitious, independently determined, enforceable noise reduction targets based on an agreed set of metrics including noise event frequency.*

5. Do you agree with the draft goals which will help us achieve our vision?

*No*

6. If you answered no, please could you provide a suggestion for how should they be framed?

*We agree with many of ICCAN's proposed goals. However, we believe there should be additional goals and we do not believe the institutional framework ICCAN has proposed will result in achievement of its goals.*

*The following additional goals should be specified:*

- a) Achieve a progressive, sustained reduction in total aircraft noise emissions, exposure and impacts, measured on an agreed basis, and in night noise*
- b) Ensure that people adversely impacted, or potentially impacted, by aircraft noise, have a meaningful and informed voice in all relevant regulatory, planning and noise management processes, including through access to appropriate, independent, industry-funded advice.*
- c) Ensure that significant consultations are clear and accessible including in relation to noise impact portrayal, so as to rebuild trust in engagement. ICCAN, or a future independent regulator, should review key consultation material for balance, adequacy and fair and transparent disclosure. In due course it should also survey consultees' views on consultations to assess their perception of fairness and balance and the degree of trust in decision-making.*

*In addition ICCAN's first proposed goal should be amended to include enforceable targets, as follows "Increase the consistency and transparency in the management of aviation noise by setting enforceable standards and providing guidance to regulators and by ensuring that enforceable targets are set and enforced".*

*The institutional framework should be strengthened in the ways described in our answers to previous questions.*

7. Are the key activities we identify to help us achieve our goals the right ones? Do you have any views on which activities should take priority over others?

*We support many of the activities ICCAN has identified.*

*Its immediate priority should be to work with DfT to strengthen aircraft noise policies and to introduce independent, expert, empowered noise regulation as soon as possible.*

8. What are your reflections on ICCAN's establishment, and its work so far?

*ICCAN made a promising start. Its wide engagement and willingness to question industry and government positions was welcome.*

*The work it has done subsequently has been useful and we support much of it. However, the great majority of this work has addressed second order matters rather than the core aviation noise management issues that need to be confronted. As a result, in our view, ICCAN's achievements to date have been modest and it has made limited progress in achieving its aims.*

*We recognise that the COVID pandemic has interrupted ICCAN's work and changed, at least temporarily, the industry context in which it is operating. However, we urge ICCAN to show more ambition and urgency in addressing the key structural issues that stand in the way of meaningful progress on noise management, set out in our responses to earlier questions. These are well known and have not changed.*

9. Are you confident that ICCAN plays a truly objective independent role in aviation noise management?

*Yes*

10. Please could you provide a brief explanation for your response?

*We believe that ICCAN is objective and independent. However, for the reasons set out in our answers to previous questions, it has so far played only a modest role in aviation noise management.*

11. Do you think ICCAN's work has materially helped the way in which decisions about aviation noise are taken?

*No*

12. Please could you provide a brief explanation for your response?

*Please see our answers to previous questions.*

13. Has ICCAN's existence and role given you more or less confidence that aviation noise will be managed better in the future?

*More*

14. Please could you provide a brief explanation for your response?

*Notwithstanding the modest progress to date, we remain optimistic that ICCAN will improve noise management. However, if it is to make a material difference, ICCAN needs to raise its sights, act faster, be bolder and address the key issues described above urgently. Unless there are positive changes in the way noise is regulated soon ICCAN is likely to lose the confidence of impacted communities.*