

13th June 2019

Corporate Strategy Consultation

Dear Rob,

Many of the communities we represent believe that ICCAN should have been set up years ago - especially in order to apply scrutiny to the Airports NPS (which will lead to considerable airspace change and new disturbances over the most densely populated residential region in the country).

That it has taken nearly five years to establish ICCAN (and in a watered-down version of what was actually recommended) has left many local communities believing that ICCAN has now - through the passage of time - already been rendered otiose.

We note, for example, your comments, in respect to the proposed development at Manston: *"Given where we are in our set up, we are not in a position to comment specifically on the proposal that there should be a requirement in the draft DCO that the authorised development at Manston should have an SOAEL5 daytime of 60 dB LAeq,16hr (free field)."*

Moreover, the current absence of power to issue fines or instructions to airports about mitigation - let alone to suggest regulatory changes that could actually result in reductions to adverse aircraft noise - only compounds the belief; as does the two-year frame in which you might commence to acquire some, as set out in the strategy.

Your board will need to demonstrate some mettle to disabuse communities of the notion that ICAAN will be nothing more than yet another talking shop, whose purpose is to provide the mirage of listening to local communities.

As you will be aware, data in the CAA's Noise Forecast and Analyses accompanying the Aviation Strategy Green Paper shows ATMs growing nearly 25% by 2030, and nearly 40% by 2050. It also shows that noise impacts will be greater than today - on almost all measures - by 2030.

Your strategy does not, however, appear to address the key issue, which is the contradiction at the heart of government policy; the government's policy to increase airport capacity, against its all too easily stated intention of minimising the number of people impacted by aircraft noise.

The main aim of ICCAN ought to be, at very least, to align itself with that stated intention: *"to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise"*.

But your proclaimed aim is to improve public confidence and trust in the management of aviation noise. Surely it should be for ICCAN to seek the powers to properly hold airlines and airports to account? For, unless the latter is achieved, ICAAN will fail to deliver the former.

It is communities who suffer the blight of noise, and the airports and wider aviation industry who create it. And yet you hope to better understand and hear the interests of the noise creator. As far as assisting communities is concerned - ICAAN's founding raison d'etre - this is akin to Lord Nelson holding the telescope to his eye patch.

Far from improving trust with the communities, such an avowed approach is only likely to intensify the mistrust that currently prevails.

For our membership, it is naturally disappointing that there are no proposals in the strategy addressing how airports might reduce their adverse noise impacts on communities.

Your final strategy should incorporate the findings of the WHO, to ensure that a proper assessment is undertaken on how people react when airspace change happens, when new flight paths are introduced, or when there's a significant increase in flight numbers on existing routes. Reliance on the discredited 2014 SoNA survey will no longer wash.

We also remain concerned about the strategy's omission to reference the need for a clear and robust definition of respite. Respite from noise is vital for all communities who are, or will be impacted, by adverse aircraft noise. ICCAN should be working towards forming a view as to what the minimum level of respite for overflowed communities must be.

Yours sincerely,



Paul McGuinness

Chair

No Third Runway Coalition

info@no3rdrunwaycoalition.co.uk