REVIEW OF THE INDEPENDENT COMMISSION ON CIVIL AVIATION NOISE (ICCAN)

SEPTEMBER 2021

Contents

1. Purpose and Objective

Good government requires that public bodies are efficient, effective and accountable. That in turn requires us to ensure our public bodies are set up correctly and that good governance processes are in place. Therefore, as is good practice, and in accordance with the Department for Transport's (DfT) plans following the announcement of ICCAN, DfT would undertake a review of the Independent Commission on Civil Aviation Noise (ICCAN).

2. Introduction

The following review is the independent, 24-month review into the Independent Commission for Civil Aviation Noise (ICCAN). The review and report have been conducted by two independent researchers and was conducted in a qualitative research fashion through interviews and literature reviews. Both reviewers are independent of government and have no connections to the aviation industry or ICCAN.

3. Scope

A tailored review of ICCAN was originally scheduled to be completed by December 2020, although was delayed due to re-allocation of resource to COVID-19 response work. However, Cabinet Office discontinued its tailored review process. As a review of ICCAN was expected by stakeholders, the Cabinet Office's advice was that the Department was able to commence its own review.

This Review falls under the scope of a Departmental Review, conducted by the Department for Transport (DfT), as a light touch alternative to a full tailored review (since the Cabinet Office Tailored review process has been suspended).

DfT planned to have a light touch in overseeing the review, with an intentionally arm's length approach. The review's scope was contained within the Review of ICCAN - Terms of Reference[1] (ToR), provided by the Department for Transport. We have followed these ToR as far as possible within the timeframe provided and with the resources available to us.

4. Methodology

The Review began in February 2021 with a final report delivered on April 14th 2021. The timeframe of the review was 6 working weeks from start to final delivery.

The methodology included:

- Conducting desktop research of key documents, such as ICCAN's published reports, communications activities, responses to consultations.
- Evidence of contributions and influence in external meetings, conferences etc, gathered from stakeholder views.
- Evidence from ICCAN and relevant stakeholders followed by meetings to explore some of the issues in more detail where necessary.

The key documents and stakeholder list were agreed with the review team by both DfT and ICCAN (See appendix).

A version of the report was seen by an independent challenge panel, the makeup of which was agreed by both the Department for Transport and ICCAN. The challenge panel debated the methodology, scope and outcomes reported by the Review Team.

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[1] Department for Transport, Review of ICCAN - Terms of Reference

The review team had one meeting with a DfT SCS member of staff, independent of the policy/sponsorship team to provide oversight of the interim findings and to ensure the review is impartial, robust and rigorous. The Review Team also had two meetings and one email consultation with the DfT Public Bodies Centre of Expertise.

5. ICCAN's operating environment in the last two years

ICCAN have been in operation for two years, before this review commenced. In that time, ICCAN have been building up their team and capabilities in terms of staffing, accumulating industry knowledge, building stakeholder relationships and putting together an expert panel of technical experts.

During the 12 months (approximately) before this review commenced, the World Health Organisation declared a global pandemic (COVID-19 pandemic) and the UK soon went into a national lockdown (26th March 2020).

The impact of the first lockdown on the aviation industry - and subsequent measures in place until now - has been a dramatic slowdown in aviation activity. This has not only translated into quieter skies, but has had a knock-on effect on airlines, airports, and associated industries – all suffering major financial losses and having to put a large proportion of their staff on the government furlough scheme. In addition, a large proportion of government resources and civil servants' time have had to be redirected towards mitigating the consequences of the pandemic, and this has impacted "normal" workstreams. This includes DfT having to re-absorb some of ICCAN's secretariat back into DfT (temporarily).

Furthermore, any airspace change plans have also been on hold in the last year, with all resource being directed towards a response to the impact of COVID-19.

Therefore, the environment that ICCAN has been operating in within the last 12 months or so has certainly not been "normal" and will undoubtedly have impacted the trajectory of their work.

This is set to change again, as the airline industry recovers and new challenges to the industry and those affected by aviation noise surface. It is possible that in response to this new environment and associated challenges that ICCAN will need to be nimble and adjust its approaches, in order to fulfil its objectives. We can already see signs of this reflected in its corporate strategy.

6. Examination of ICCAN Outcomes

6.1 Assessing Original Objectives

One area that became apparent early on during our interviews, and is a recurrent theme, is a lack of clarity on ICCAN's objectives, reflected in a varied understanding of ICCAN's purpose from the different stakeholders we spoke to. The review team also felt that there was some lack of clarity - in assessing ICCAN against original objectives. At times ICCAN's functions and objectives were confused by stakeholders, and this is reflected in comments about lack of clarity and the various interpretations on objectives.

We will be reviewing ICCAN's functions later in the report.

This is evidenced through the different versions of ICCAN's objectives, which can be found from the following sources:

- The 2017 Consultation Response[1][3].
- The 2017 Air Navigation Guidance and CAP1616

- ICCAN's first corporate strategy – i.e. 'its interpretation of its objectives' [2][1].
- DfT and ICCAN draft framework agreement.

DfT and ICCAN disagreed over the role of documents such as Aviation 2050 and Transport Minister Baroness Vere's letter to ICCAN in 2019. ICCAN treated Aviation 2050 as a source of DfT guidance on objectives, and Baroness Vere's letter as a consultation response. DfT considers that Aviation 2050 was a consultation, with proposals under consideration, rather than guidance, and that Baroness Vere's letter was guidance on DfT's expectations of ICCAN.

In 2019, Baroness Vere (then Transport Minister for Aviation, International and Security - Aviation Minister) wrote to ICCAN[2] to provide guidance on ICCAN's objectives. Baroness Vere's guidance referenced the yet to be finalised terms of reference, and prioritised the following three areas:

- Review of mechanisms for enforcement
- Complaint resolution, and
- Best Practice Guidance about noise impacts for airspace change sponsors.

DfT and ICCAN began working on a framework agreement following the establishment of ICCAN which states that the 'Five main functions designed by DfT at inception and included in the framework document are:

1. Best practice guidance for all aspects of the Airspace Change process
2. Noise controls and operating restrictions
3. Other best practice guidance around noise management, engagement etc.
4. Research around the enforcement and compliance with noise controls measures, the health impacts, etc.
5. Monitoring and quality assurance of airports noise measurements as well as the noise modelling for night flights.'

The framework agreement has yet to be finalised and remains in draft status.

In ICCAN's first Corporate Strategy, ICCAN's Objectives[3] were listed as follows;
- To increase trust, transparency, and clarity in the aviation noise debate,

- To promote consistency, responsibility and accountability within the industry and beyond, and

- To establish our expertise, authority and credibility.

The review team feel that these broad aims or statements of purpose are possibly too broad in nature to communicate objective or material understanding of ICCAN's functions, therefore there is some confusion from stakeholders in terms of what ICCAN should be *doing*. That said, there is a general consensus from stakeholders that part of ICCAN's purpose is indeed to "increase trust, transparency and clarity in the aviation noise debate" – the confusion seems to be on *how* this should be achieved.

As noted above, the DfT/ICCAN framework agreement objectives do not entirely match those mentioned as priority areas for the Government as per Baroness Vere's 2019 letter, the priorities of which were reinforced by the Under Secretary of State separately[4]. However, the Framework

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[2] Baroness Vere letter to ICCAN, 2019
[3] https://iccan.gov.uk/iccan-our-work/ and https://iccan.gov.uk/iccan-corporate-strategy-2019-2021/
[4] Paul Maynard letter to Rob Light, 2019

Agreement between ICCAN and DfT was never finalised and therefore it could be argued that Baroness Vere's prioritisation of objectives should supersede. Again, there is some lack of clarity, and we feel that there is a need for some alignment between DfT and ICCAN in terms of clarifying objectives and priorities, agreeing a Framework Agreement, and finalising terms of reference.

When ICCAN was challenged on the differing objectives stated/lack of consistent objectives between those communicated in their first corporate strategy, and those both in the DfT/ICCAN Framework Agreement and Baroness Vere's guidance letter, ICCAN stated that they were an independent body (therefore had some leeway in terms of prioritising and setting objectives). After a period of consultation with various stakeholders, including 'Government', ICCAN subsequently defined their "priority areas". This statement was made despite the Aviation Minister's 2019 request for progress against 'outcomes in the priority areas the Government has defined'[5], before this review of ICCAN.

Two of the three priority areas listed were not completed within the initial two-year timeframe (Review of mechanisms for enforcement and Complaint resolution).   That said, the only area that remains outstanding from the three priorities outlined by Baroness Vere is that regarding "Complaint resolution" –, though this was one of the priorities set in the original 2017 Consultation Response on UK Airspace Policy[6] ("a review of existing mechanisms for enforcement and complaint resolution will be a priority for ICCAN upon setup"). However, ICCAN have addressed this outstanding point in their latest Corporate Strategy 2021-24 (published during the period when this review was taking place).

ICCAN plans to "Review and assess approaches to complaints across UK airports and publish initial findings and recommendations (Initial findings and next steps by end Q2 2021)."   Based on our understanding from ICCAN, they envisage that this work will be especially necessary in light of a rebound in aviation activity and a subsequent increase in aviation noise, following the easing of travel restrictions that have been in place because of the COVID-19 pandemic.

In many of the interviews we conducted, stakeholders felt that ICCAN was not completely fulfilling the role that had been required of it (as far as they perceived this role). This brings us back to one of our core findings, that there is confusion on what role ICCAN should play within the aviation noise debate.

There is a perception from community groups that ICCAN is there to advocate and champion the cause of the community. The aviation industry generally perceives ICCAN to be a conduit for conveying information to the community and conveying the community perspective to the industry, in addition to outlining best practices. It would appear that the Government and the Department for Transport (DfT) want an independent commission to provide support to airspace change, by providing information and advice that would help shape policy. To summarise the above, the direction of ICCAN

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[5] Baroness Vere letter to ICCAN, 2019
[6]https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918784/consultation-response-on-uk-airspace-policy-web.pdf

over the past two years has been confused by various documents and stakeholders having different perspectives on ICCAN's objectives.

In our view, this lack of clarity is impacting perceptions of ICCAN across the stakeholder groups and limiting its ability to be impactful (which is another core finding we have encountered through our interviews – to be examined later in this report). In our view, ICCAN should be supporting the Government, as the Arm's Length Body (ALB) for Aviation Noise and therefore should have followed the guidance from the Aviation Minister in 2019. This could have helped ICCAN to be more focussed and impactful.

Whilst ICCAN is an independent Arm's Length Body, it is our opinion that working with DfT on addressing objectives and clearly defining objectives should not impact its independence. That said, we do see evidence in ICCAN's Corporate Strategy 2021-24[7] of ICCAN addressing the guidance given by the Aviation Minister in 2019, by designing a work programme that will deliver against the specific objectives.

6.2 Progress against Objectives

ICCAN's Corporate Strategy 2019 – 2021[8] provided reports on activity based on;

- 300 meetings with stakeholders.
- Various reports published.
- Various meetings attended.

Publications produced by ICCAN were not in line with the priorities set to them by government (e.g., the choice to prioritise the SoNA 2014 review and design of a new survey, over working towards the complaint resolution objective set by Government).

Stakeholders across the board believed that ICCAN have a positive role to play in the aviation noise debate, however the majority of stakeholders had suggestions for improvements directed at ICCAN's performance in some respect. As mentioned above, there are differing expectations from stakeholders on ICCAN's work, therefore improvements desired by stakeholders could be attributed to a disappointment because their expectations were not being met. Again, we would like to highlight that the array of expectations from different stakeholders may not be in line with ICCAN's core mission or objectives (i.e., there is a disconnect between what stakeholders perceive ICCAN should be doing versus the tasks set out to ICCAN by government lately in Baroness Vere's letter).

As one industry stakeholder summarises, ICCAN have helped in improving interaction between industry and communities, and "their views are taken seriously by airports". However, following this initial period, "there will be more stakeholder frustration at the slowness. All stakeholders will have expectations that will just not be met".

Community Perspective

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[7] https://iccan.gov.uk/wp-content/uploads/2021_03_18_ICCAN_Corporate_Strategy_2021_2024.pdf
[8] https://iccan.gov.uk/wp-content/uploads/2019_07_25_ICCAN_Corporate_Strategy-2019_2021.pdf

Community groups felt that ICCAN had not 'tackled aviation noise in an effective or impactful manner' (which had various interpretations from shutting down airports to rerouting flights) but commented that their listening and engagement was positive. Local campaign groups perceive ICCAN as representing their interests, despite there being no indication from ICCAN that this is their job.

Community stakeholders we spoke to were universal in their praise for ICCAN's high level of engagement, particularly during their first year in operation:

"We welcomed ICCAN, it did all the right things in the first year. They built quite a good understanding of the various stakeholder perspectives and went out and met and engaged with lots of people."

However, there was also frustration expressed at the pace of action and ability to impact of ICCAN, "Towards the end of the first year, there began to be a frustration amongst campaigners. [we] felt that it's time for ICCAN to act. It's had a less successful second year. Its action hasn't matched the positive engagement in their first year".

Furthermore, there was generally a perception from community groups that a lack of power to enforce change was limiting ICCAN's ability to make an impact:

"Given the lack of statutory power, given the modest resource at their disposal [they are limited in what they can do]."

Reports and publications issued by ICCAN were generally met positively, but community stakeholders we spoke to questioned how new data and reports were going to be utilised to make positive changes.

Expert/Academic Perspective

This stakeholder group also welcomed the existence and principle of ICCAN – as expressed by one stakeholder: "It's very good to have an independent, arms-length organisation. It is needed. There's a good functional role for ICCAN".

Echoing other comments on its ability to make an impact and move things forward in aviation noise, there was a view expressed that ICCAN "needs to add something beyond the existing organisations. They need to be dynamic. They need a refresh on what they're doing in order to be dynamic and relevant...but there are challenges they need to come to grips with – their relevance – in order for their role to be fulfilled".

Another concern cited by this stakeholder group is a lack of technical expertise within ICCAN. There was a perspective that ICCAN "need to ensure they have sufficient expertise if they are going to enhance their role". It was felt that whilst ICCAN "are very professional" there was some concern about "competencies around noise and the variation of elements – I think they are lacking [here]."

There is a recognition that ICCAN have gained a lot of knowledge within their first two years, but there remains a significant learning curve: "the challenge with ICCAN is that they have defaulted to the status quo in terms of how they're looking at acoustics and have failed to get enough input from experts".

Department for Transport Perspective

When asked about ICCAN's performance against their objectives stated, DfT questioned if 'the Aviation Noise debate moved forwards?' This was also the view reflected by others in the industry.

However, the Review Team has no way to objectively assess if the debate around aviation noise had progressed, despite the publications and engagement from ICCAN.

With regard to policy, DfT stated they did not receive the input they expected or needed, despite being ICCAN's sponsoring body. In their opinion, ICCAN only engage them on governance issues and not issues of policy or advice. As mentioned earlier, we believe that ICCAN and DfT would benefit from some greater communication/collaboration, and do not feel that this should encroach on ICCAN's independence.

The 2019-21 Corporate Strategy highlighted that no advice had been given to the Secretary of State, Planning Inspectorate or Civil Aviation Authority, as requested by Objective 3 of the ICCAN Corporate Strategy, "*Establish our expertise, authority and credibility*". This is an objective quoted by the Framework Agreement, Corporate Strategy and Baroness Vere letter, and despite the impact of the COVID-19 pandemic, we would have expected to see progress made against this objective, especially around the modernising aviation and *Build Back Better* strategy from HM Government.

Industry Perspective

In general, industry perceive ICCAN's role is to provide best practice advice to airports about how best to engage with the local population in relation to airspace changes and to conduct research to inform policy considerations.

In general, there remains wide support from the industry for a need for a body like ICCAN, as expressed by one airport: "we supported the introduction of ICCAN as we had long recognised the need for an independent expert voice within the aviation noise debate. Our support for the role of ICCAN remains and we look forward to continuing to engage, and where appropriate, work with them on noise management issues".

There was acknowledgment from industry stakeholders that ICCAN had done lots of work in terms of engagement with the community and industry, however, there were also concerns that engagement from ICCAN with industry was not sufficient and they expressed a perception of potential bias towards representing the community perspective. Stakeholders felt that ICCAN was presenting a narrative of "industry verses the community", and there is a risk that this could erode some of the trust between the industry and ICCAN. On two examples where airlines, airports and the CAA were involved in improving noise outcomes, ICCAN had not been engaged – however, the review team is unclear on whether ICCAN were requested to engage, or simply that airports and the CAA had chosen not to involve them. There were also concerns from airports about ICCAN confusing the landscape by speaking to local community groups without informing airports (this is in reference to a survey conducted during the first national lockdown by IPSOS MORI), demonstrating a lack of coordination and trust between key entities.

In addition, one airport expressed a concern that ICCAN was publishing reports during the COVID-19 pandemic, when they felt publications should have paused. On these reports, some airports felt that ICCAN had not engaged them (when they could have done – for example to access data that was not in the public domain). ICCAN stated that if information was not provided by airports on their websites, that was an airport communication issue rather than a failure of engagement by ICCAN and airports.

There was a view from industry that ICCAN should focus on facilitating communication between industry and community, especially in anticipation of the return of aviation noise following the COVID-19 pandemic. ICCAN's pursuit of statutory status, appeared to be something they were fixated on (as expressed by one airport). Similar comments on statutory powers were noted across our engagement,

despite ICCAN's own objectives not stating the requirement (there was mention in the Baroness Vere letter[9] and Framework Agreement[10]).

To summarise:

We appreciate that the COVID-19 pandemic and young age of the organisation will have added difficulties to achieving objectives. However, whilst ICCAN Commissioners were keen to agree that a review into Instrument Landing Systems taking four years was too long, progress against objectives is in our opinion somewhat limited after two years. Whilst the renewed corporate strategy does address areas that remain outstanding, by then it will have taken ICCAN 4-5 years to move forward the debate on aviation noise and fulfil some core objectives.

This slow performance is despite Commissioners feeling they had adequate resource for their ambitions. They felt that the size of the organisation was right, didn't want to be too big and become a "quango". Commissioners stated that they were ambitious about the future, but realistic.

Having examined ICCAN's latest Corporate Strategy[11], we do have some concerns that the work programme set out by ICCAN is perhaps too ambitious given their size and internal level of technical expertise and would encourage them to review this and streamline some of this work. We did mention this to ICCAN, but they felt that their programme of work was in line with their size and resources.

In summary, we would agree with ICCAN that they have focussed on 'building social capital' during their first two years, however we would echo some stakeholder views that there has been limited progress on the aviation noise debate, particularly around Government policy. As noted above, there is evidence of intent to further their work on aviation noise (which will hopefully feed into advice to government and policy where appropriate) and build on the foundations they have put down in the past two years.

Where ICCAN have succeeded:

- Establishing transparency as an organisation
- Engagement with Industry and community
- Establishing trust with communities, and to some extent industry
- Establishing ground knowledge on core issues relating to aviation noise

Where improvements can be made:

- Producing output that is impactful with clear and practical recommendations.
- Follow-up and evaluation of best practice guidance, to ensure its relevance and support communities and industry in putting it into practice.
- Clarifying their role further with all stakeholders, eliminating confusion and managing expectations.
- Enhancing technical expertise

7. Reports

We believe that the reports published so far by ICCAN are very important as they enable them to demonstrate their credibility in the debate around aviation noise management, as well as providing

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[9] Baroness Vere letter to ICCAN, 2019
[10] Department for Transport, Framework Agreement
[11] https://iccan.gov.uk/wp-content/uploads/2021_03_18_ICCAN_Corporate_Strategy_2021_2024.pdf

guidance and information to stakeholders in line with the DfT /ICCAN/Government objectives. The feedback gathered from the stakeholders as part of this review on those reports was mixed and concerns over the confusing and congested research were raised. We have listed below some of their most compelling comments:

- The SONA Review study[12] did not address moving the aviation noise debate forwards.
- On the Health Report[13], the WHO had conducted "hundreds of studies on the effects of aviation noise" and how did this move the conversation forwards.
- On the insulation report[14], the report missed off airport issued insulation and focussed on acoustic products, without any consultation with airports on the report. ICCAN stated that they withheld from consultation due to the impact of COVID-19 on industry staffing. Stakeholders believed the requirement was for increased guidance, not more reports (which could be recommended by ICCAN to be conducted by Government to add credibility).
- On ICCAN's noise metrics report[15], stakeholders commented that the reports were confusing the debate. One expert mentioned that the metrics work conducted by ICCAN was maintaining the status quo and they would have liked to have seen an innovative approach taken to metrics.
- Many of the report topics ICCAN had produced were not new, but over 40 years old. We want guidance on issues such as; how do we (industry) know if we have a noise problem?

A more detailed review of ICCAN's reports is outlined in the section below.

8. ICCAN Functions and Actions

8.1 SHORT-TERM: ICCAN was set up to establish a credible and authoritative independent voice on civil aviation noise issues.

We feel that ICCAN's independence has been established, though there are some criticisms from some in the Aviation Industry that the views of community are being taken into account more so than that of industry, and this is reflected in some of the language and imagery used in ICCAN reports. For example, there was a view expressed from an industry representative that ICCAN presents the relationship between community and industry as broken, whilst many airports do not feel that this is the case and feel that they have made considerable progress in engagement with their community groups - "[it] comes across that [ICCAN] see a broken industry, it's not the reality. There needs to be a bit of reset – how they define the industry".

On the other hand, we found through our interviews with stakeholders that there is some frustration from communities that ICCAN have not done enough in terms of "action" and that whilst they recognise that ICCAN have done a good job in engaging with industry and community, they have yet to see any outcomes that impact them (as people who experience aviation noise).

ICCAN's independence is also recognised by the DfT, however some DfT stakeholders interviewed by the Review Team have expressed a view that ICCAN has guarded its independence "too closely", at the expense of a collaborative working relationship with DfT. ICCAN has not had the opportunity to

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[12] https://iccan.gov.uk/iccan-survey-of-noise-attitudes-2014-review/

[13] https://iccan.gov.uk/aviation-noise-public-health/

[14] https://iccan.gov.uk/airport-noise-insulation-schemes-iccan-review/

[15] https://iccan.gov.uk/iccan-review-aviation-noise-metrics-measurements/

respond to this specifically, however we do feel that given that these concerns have been cited, there is an opportunity for dialogue on this issue with DfT, and to understand why this perception exists.

One aspect that we would like to comment on again, in terms of the establishment of ICCAN, is that the lack of finalised Terms of Reference and Stakeholder Agreement remains an outstanding issue and may be a contributing factor in terms of the working relationship between ICCAN and DfT. It is our recommendation that both ICCAN and DfT work to reach a conclusion on this matter. In addition, as mentioned above, this lack of clarity in terms of objectives may have contributed to some confusion on the role ICCAN should be playing, and what outcomes are expected of ICCAN. Again, we would recommend that if there remains any lack of clarity, that this is resolved in a finalised Terms of Reference and Stakeholder Agreement.

In terms of transparency, we feel that ICCAN have been very transparent in their processes – e.g. publication of Board minutes[16], stakeholder engagement[17], having a clear and easy to navigate website, with all publications[18] easily accessible. In addition, ICCAN have demonstrated transparency by publishing information on spending, senior staff expenses, their expert panel, freedom of information and their correspondence in a clearly labelled and easily accessible section of their website ("Transparency[19]"). Governance[20] information is also equally easily identified and accessible on their website, including a register of interests.

Another aim set to ICCAN is: to help industry and communities interact with one another in a positive and effective manner, by ensuring noise information is communicated accurately and appropriately and best practice on noise management is disseminated and followed where applicable.

ICCAN have published several reports since its two years in operation, which to our knowledge have been disseminated to stakeholders via newsletters, and published on ICCAN's website.

From our interviews with stakeholders, it is evident that there is wide knowledge of these reports amongst most of the relevant stakeholders – these are specifically representatives from the aviation industry, community groups, DfT and academics. However, we do not have knowledge of any these reports being recognised beyond this limited scope – i.e., we are not aware of the general public's knowledge of ICCAN's work, such as low-income families living close to airports.

We also do not have knowledge of any follow-up upon publication of reports that would enable best practice on noise management to be "followed where applicable". We are not aware of any mechanisms in place within ICCAN's scope and remit to enable this to occur.

ICCAN's publication of a guide on "best practice for engagement between airports and communities on aviation noise" is generally seen as a first step in helping industry and communities interact with one another in a positive and effective manner. Major airports found this report to be a useful 'stamp of approval' for the work they were already doing with communities.

8.2 Medium/Long term objectives: Examination of ICCAN's Functions

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[16] https://iccan.gov.uk/about-iccan/governance/board-meeting-minutes-papers/
[17] https://iccan.gov.uk/about-iccan/iccan-affairs/iccan-engagements-list/
[18] https://iccan.gov.uk/iccan-our-work/publications/
[19] https://iccan.gov.uk/about-iccan/iccan-affairs/
[20] https://iccan.gov.uk/about-iccan/governance/

ICCAN's functions, as set out by DfT are listed below, and will be reviewed in the following section. <u>There is no indication in the Terms of Reference of the Review on a timeframe on when these functions should be commenced/achieved within ICCAN's work programme</u>:

1. Develop and maintain best practice guidance about noise impacts for airspace change sponsors to take into account during the airspace change design process.

2. Develop and maintain best practice guidance relating to the noise considerations in the Civil Aviation Authority's Post Implementation Review process for airspace changes.

3. Provide expert noise advice to the Secretary of State for airspace change decisions called-in by the Secretary of State.

4. Develop and maintain best practice guidance on the process to agree operating restrictions for airports and relevant competent authorities to take into account when considering noise management issues.

5. Publish, promote and maintain other best practice guidance including on noise management, engagement on noise issues, use of enforcement tools and the role of conciliation in disputes.

6. Develop best practice guidance for the CAA on areas where it can apply its information powers.

7. Review recent research evidence related to aviation noise and where gaps in evidence exist, undertake or commission independent research.

8. Monitor and quality assure airports' noise measurements and reporting (such as noise action plans) as well as many of the processes and functions which have an impact on aircraft noise, including future noise forecasts.

9. Assure the noise modelling used for the night flight regime options.

10. Input to planning inquiries relating to airport infrastructure.

In the section below we will consider how effectively ICCAN has discharged or addressed each of these functions.

8.2.1 Review of ICCAN's Functions

1. Develop and maintain best practice guidance about noise impacts for airspace change sponsors to take into account during the airspace change design process.

NB: our understanding of "airspace change sponsors" in this context is that airports primarily perform this role.

In July 2020, ICCAN published an online toolkit for airports ("<u>ICCAN Toolkit for consulting on airspace change</u>[21]"), which provides help and advice for airspace change sponsors in planning for public consultations - predominantly on Level 1 changes under Step 3A of the Civil Aviation Authority's CAP1616 process.

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[21] https://iccan.gov.uk/iccan-toolkit-consulting-airspace-change/

Feedback we received from stakeholders regarding this toolkit has been positive, and it is perceived to be a useful tool.

Speaking to one airport stakeholder, they expressed that the toolkit was useful, though the airport wanted more engagement with ICCAN and stated that they would be willing to provide acoustic and radar data if requested by ICCAN.

Feedback from community on the toolkit has also been positive: viewed as well-informed, articulating concerns of industry and community. The work done on the toolkit and ICCAN's reports in general – were seen to contribute to trust-building.

"Toolkits are [well-]informed and articulate concerns industry would have raised as well. Generally, [ICCAN's] reports are more likely to build trust." – View expressed by a community stakeholder

However, there is also some frustration expressed from community members that the toolkit does not go far enough – i.e., publication alone is not sufficient and it was suggested by a community stakeholder that ICCAN should go a step further to encourage airports to use the toolkit and to evaluate its usage.

> *"[the toolkit] is out there on their website. That's not enough…They can talk to the airports, encouraging them to use the toolkit… They can ask airports to assess if they have used their toolkit." – View expressed by a community stakeholder.*

2. **Develop and maintain best practice guidance relating to the noise considerations in the Civil Aviation Authority's Post Implementation Review process for airspace changes.**

We have not seen any evidence of this work being done – this has been reflected by conversations with both ICCAN and the CAA.

ICCAN have expressed that this work has been pushed back to make room for other priorities within their first two years in operation. It is intended to be delivered during the next work programme (2022-23), as outlined in ICCAN's Corporate Strategy 2021-24[22].

3. **Provide expert noise advice to the Secretary of State for airspace change decisions called-in by the Secretary of State.**

We have not seen any evidence of this as yet and have been assured that there have not been any instances where this has been required.

4. **Develop and maintain best practice guidance on the process to agree operating restrictions for airports and relevant competent authorities to take into account when considering noise management issues.**

We have not seen any evidence of this work being done – this has been reflected by conversations with ICCAN.

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[22] https://iccan.gov.uk/iccan-corporate-strategy-2021-2024/

This is being pushed back to the next work programme, as outlined in ICCAN's Corporate Strategy 2021-24[23]:

> "Scope and initiate work with industry, as aviation levels start to recover, to investigate operational areas where improvements can be made to how noise is managed" - by end Q4 2021-22.

> "Continue to work with industry to investigate operational areas where improvements can be made to how noise is managed" – 2022-23.

It is envisaged by ICCAN that good practice on operating restrictions could be worked on with Sustainable Aviation, however progress on this work has not been made in the past year due to the impact of the COVID-19 pandemic on the airline industry (i.e., many staff being furloughed).

It should be noted that through our stakeholder interviews, we are aware of one operational trial being planned by an airport in England – however, the airport has cited a general lack of engagement from ICCAN, therefore they have not felt able to engage with ICCAN on this potential trial. We have not been able to verify this with ICCAN, as comments given to the review team are done so in confidence.

"We will do some kind of landing gear deployment trial [this year or next year]. It would make sense for ICCAN to be involved in that, and to be more engaged." – representative from an airport in England.

5. **Publish, promote and maintain other best practice guidance including on noise management, engagement on noise issues, use of enforcement tools and the role of conciliation in disputes.**

ICCAN has published several reports and guidance in the last two years (See Table 1 for list of key ICCAN publications), which have been met with varied reaction from industry and community (to be discussed later in this section). It should be noted that there have been delays in publishing much of this output, which is highly likely attributable to the impact of the COVID-19 pandemic. However, we feel that given the number of reports and guidance, ICCAN has succeeded in meeting the core function of publishing best practice guidance.

In addition, ICCAN's Corporate Strategy 2021-24[24] outlines how this body of work will be built on, including reviews of its best practice guidance, demonstrating a commitment in continuing to meet this function.

One area where we have not seen evidence of any work is the "use of enforcement tools and the role of conciliation in disputes".

That said, ICCAN's view presented in their Report on the Future of Aviation Noise Management[25] (March 2021) on enforcement is that "existing regulators should retain their current responsibilities, including enforcement; however, as ICCAN moves to a statutory footing, it would look to deliver advice and guidance that leads to more consistent and better noise management. Responsible bodies would have a duty to consider and respond to our recommendations". The question of ICCAN's movement to a statutory footing is to be addressed later in this Review Report.

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[23] https://iccan.gov.uk/iccan-corporate-strategy-2021-2024/
[24] https://iccan.gov.uk/iccan-corporate-strategy-2021-2024/
[25] https://iccan.gov.uk/wp-content/uploads/2021_03_18_ICCAN_report_on_the_future_of_aviation_noise_management-1.pdf

Deliverable	Planned timescale	Outcome
Review of Survey of Noise Attitudes (SoNA)	December 2019	Published December 2019
Review of noise metrics and measurement	April 2020	Published July 2020 (ICCAN report delayed due to COVID)
Toolkit on consultation around airspace change	April 2020	Launched online July 2020
Review of evidence on links between aviation noise and health	September 2020	Published September 2020
Survey of people's experiences during lockdown	Not in ICCAN's original work programme	Published October 2020
Emerging view on future of aviation noise management	September 2020	Published October 2020
Best practice on wider engagement between airports and communities	April 2020	Published December 2020
Report on noise insulation schemes	September 2020	Published February 2021
Report on future of aviation noise management	September 2020	Published March 2021

Table 1 – ICCAN's Key milestones 2019-21 (as per ICCAN's Corporate Strategy 2021-24)

6. **Develop best practice guidance for the CAA on areas where it can apply its information powers.**

We have not seen evidence of this work taking place, and this has been confirmed through conversations with ICCAN. ICCAN have suggested that there was some lack of clarity from the CAA on the objective of this, but welcome collaboration between ICCAN analysts and CAA's ERCD to deliver on this function.

This is reflected in ICCAN's Corporate Strategy 2021-24[26], where ICCAN set a plan to "Complete our review of the CAA's information powers and make recommendations on the best use of them in the future" (planned for 2022-23).

7. **Review recent research evidence related to aviation noise and where gaps in evidence exist, undertake or commission independent research.**

ICCAN have undertaken and commissioned several research projects that aim to inform knowledge on aviation noise. This includes:

A Review of Survey of Noise Attitudes (SoNA)[27] – December 2019

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[26] https://iccan.gov.uk/iccan-corporate-strategy-2021-2024/
[27] https://iccan.gov.uk/tag/sona/

- The review of SoNA 2014 identified that there was "considerable debate around the robustness of SoNA 2014's methodology and results, with some community groups voicing a lack of confidence in SoNA and decisions based on SoNA's results".
- Having examined the 2014 SoNA report and engaged with an array of stakeholders, ICCAN concluded that a "new, regular attitudinal survey is begun before the end of 2021, and repeated frequently". They identified that this survey "should be commissioned, run and analysed independent of Government, regulators and industry", and considered it "appropriate for ICCAN to take on this role, working closely with relevant stakeholders".
- ICCAN subsequently set up an Aviation Noise Survey Advisory Board[28], which first met on March 3rd 2020. The board comprised of representatives from across the aviation sector, with a purpose of giving "independent, expert advice on direction, priorities and issues throughout the project. Their conclusions will be presented to ICCAN's board of commissioners who will consider the groups advice when making their final decisions on the design of the survey".
- From our interviews with various stakeholders who were involved in the Noise Survey Advisory Board, we have received positive feedback on the spirit of inclusion and collaboration that ICCAN demonstrated in taking on this initiative, particularly in bringing lots of different stakeholders to the table. This is in keeping with ICCAN's objective to "increase trust, transparency, and clarity in the aviation noise debate".
- However, it should be noted that we also heard some criticism from industry, as they had a perception of being underrepresented in this process and felt that there were more community groups included compared to industry representatives [See Appendix for a list of representatives].
- In addition, we have also spoken to various stakeholders who question the need for a new survey of people's attitudes, as they feel it will not add value or move the debate forward. For example, one expert called into question the "validity of the 2014 survey design" and felt that a "rigorous debate that takes into account all of [the new research on noise perception] before another survey is done".

A review of aviation noise metrics and measurement[29] – July 2020

- ICCAN produced this review as an initial piece of work reviewing how aviation noise is "measured, monitored and reported by airports. It contains findings and recommendations on how to improve wider understanding of aviation noise and rebuild trust with communities".
- ICCAN demonstrated a good level of robustness in reviewing relevant research – one Noise expert expresses this, indicating that ICCAN "have certainly done their research and covered a decent amount of detail in the report".
- We have received mixed feedback on the report – with many agreeing that it is a robust review of the current evidence, but many also expressed disappointment that the report did not go far enough in making specific recommendations on noise measurement metrics.
- For example, one community member notes that whilst the metrics report is a "good contribution to the debate, it's a debate that's been around a long time… [it doesn't need] more good contribution, it needs action".
- However, there is also an opinion that the report did not go far enough, as expressed by one community member: "how can they move [the debate] on a bit? [it] wasn't the best use of their time… what they should do is to take it forward, to say which are the best metrics in the best circumstances."

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[28] https://iccan.gov.uk/about-iccan/governance/iccan-advisory-board-new-aviation-noise-survey/
[29] https://iccan.gov.uk/iccan-review-aviation-noise-metrics-measurements/

- This view is echoed by some in government/from regulators: "it's up to airports to implement their own metrics but that is not good enough, there needs to be a universally adopted solution. A clear-cut recommendation [in the metrics report] would have been better".
- Another similar comment is that the proposals "in terms of best practice guidance don't seem to [go far enough or clear enough when it comes to noise validation].
- That said, ICCAN do state in the report that there will be follow-up best-practice guidance, which will include recommendations: "ICCAN will provide national leadership and set standards for metrics by developing and publishing such best practice guidance in the months to come[30]".
- ICCAN also note that: "The publication of this report precedes the Government's anticipated Aviation 2050 strategy, which is likely to consider the use of metrics and noise envelopes. While we do not have powers to enact or introduce our recommendations, we will work closely with the aviation industry, regulators and Government to encourage their adoption".
- Furthermore, ICCAN have stated in their Corporate Strategy 2021-24[31] that the follow-up to this report will commence in Q1 2021-22, where they will "initiate programme of work to set best practice on the use, collation, analysis and publication of noise metrics", establishing a working group with industry, communities and regulators, with the aim to publish "best practice on the use, collation, analysis and publication of noise metrics" by Q4 2022- 23.

Aviation Noise and Public Health[32] (produced by NatCen for ICCAN) - September 2020

- ICCAN commissioned NatCen "to bring together previous reviews examining the existing evidence around the relationship between aviation noise and people's health".
- The review was intended as a first step into the area of aviation noise and public health and sought to "identify gaps in the evidence and suggest possible future studies to develop the evidence base". "This review is ICCAN's first step in exploring potential future areas of health research and how it might take this forward in its work programme".
- Feedback we received on the report was limited, but as with other reports there was a view that it is a comprehensive review of current research, but "doesn't add value" (as expressed by one community group member). "The health work was useful but reinventing the wheel to some to some extent" (the view expressed by another community member).
- However, as stated by ICCAN, the review was intended as a first step, to set up an evidence base and identify gaps in the current knowledge in this area, which is in line with ICCAN's function stated above.
- ICCAN's Corporate Strategy 2021-24[33] states their intent to build on the work of this report by producing further works streams which support their stated vision of 'Putting people's health at the heart of aviation noise policy'. This will include work to "Finalise prioritisation of health and wellbeing research and establish working relationships" in addition to work to "start to identify funding streams for research and build partnerships for future work" (planned for Q1 2021-22). In addition, ICCAN plan to "continue to initiate and lead on chosen health and wellbeing impact priorities" (planned for 2022-24).

Survey on people's experience of aviation noise during lockdown[34] (produced by Ipsos MORI for ICCAN) – October 2020

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[30] https://iccan.gov.uk/iccan-aviation-recovery-better-understanding-noise-new-report/
[31] https://iccan.gov.uk/iccan-corporate-strategy-2021-2024/
[32] https://iccan.gov.uk/aviation-noise-public-health/
[33] https://iccan.gov.uk/iccan-corporate-strategy-2021-2024/
[34] https://iccan.gov.uk/aviation-noise-lockdown-survey/

- This report was not part of ICCAN's original planned workstream and is a product of ICCAN deciding to take advantage of the new, unexpected environment during lockdown and commission an independent study using Ipsos MORI about the "experiences of aviation noise among people living close to UK airports".
- The survey was conducted amongst 2,000 participants living around 5 UK airports.
- We should note that we heard more than one comment from some of these airports that ICCAN did not notify them that this research was to be conducted, and they felt that it would have been appropriate for ICCAN simply to inform them, rather than find out from community members that the survey was being conducted. They felt that this was not in keeping with ICCAN's ethos of transparency.
- We received minimal feedback on the content of the report, so we are not able to provide commentary on any impact it may or may not have made.
- Our understanding from ICCAN as that this is the only study done in this area during the lockdown period (perhaps the only study in Europe).
- The report is intended to be used as a benchmark for future work and data collected in the survey will be used "to learn more about people's views towards aviation noise as the industry recovers."

Best practice for engagement between airports and communities on aviation noise[35] – December 2020

- This guidance produced by ICCAN "sets out best practice on how airports engage key stakeholders and local communities about noise, both during this quieter period, and as aviation levels return".
- Echoing the comments on other reports, it was generally felt that this was a good and thorough piece of work but limited in its impact.
- There was also a view from industry that it may not be necessarily relevant to airports that have a more mature engagement practice – as expressed by one industry stakeholder: "[it] has been done well, but how much is relevant to the big airports - to us - who are [already] doing this stuff? Not enough for what we need and too much for what the smaller airports might need…"
- Others feel that the advice put forward in the report is "very subjective" given that it is "a complicated subject to bring together on paper, [they have done a] good job on best practice.
- However, in terms of impact and policy, it was felt that "they have not done the big policy work, but that's not part of their business plan".
- Community groups also expressed positive views on the best practice work, but felt that it was of secondary importance in moving the noise debate forward: "Effective engagement is not what matters…Engaging well is a good thing to do, but what communities would much rather happen, is that someone grasp the nettle on regulation. Good piece of work, but not hit the button".

Review of Airport Noise Insulation Schemes[36] (produced by BRE for ICCAN)– March 2021

- ICCAN published a review of airport noise insulation schemes, looking at the current approaches used in the UK and how they mitigate noise.
- ICCAN commissioned the Building Research Establishment (BRE) to conduct this technical review.
- The feedback we received on this report, through our interviews was that whilst it was a thorough piece of work, examining current approaches, it was too technical and less relevant

[35] https://iccan.gov.uk/engagement-best-practice/
[36] https://iccan.gov.uk/wp-content/uploads/2021_03_01_ICCAN_review_of_airport_noise_insulation_schemes.pdf

to the "issues on the ground" – i.e., in terms of the difference such schemes make to people's lives who are affected by aviation noise.

- Interviews also revealed that some felt that the report did not add "anything new" to the area of noise insulation schemes.
- One academic/expert expressed that "there is a lot of existing research about aviation noise insulation…it's useful to have a centralised resource that [looks] at the UK as a whole, rather than an individual airport producing such a report, but I don't think it's telling us anything new…It's not telling the industry or people (noise sufferers) anything distinctly different. Begs the question why do we need a national government funded body to give us a noise insulation report? If we were getting these documents as well as the innovation roadmap then I would think they are covering all bases."
- A view expressed by community was sceptical about the need for a report on insulation schemes and felt that it wasn't addressing core issues – "Insulating properties is something that government and industry wheel it out to demonstrate that they are doing something. It's a second order issue".
- DfT also questioned the level of useful insight of the report and felt that it was more akin to a building standards document, and therefore fell outside the remit of ICCAN.
- One airport we spoke to felt that they should have been consulted on the report, and felt that some of their work on insulation and acoustic testing had not been represented in the report (as it was not publicly available) – they stated that they would have provided information on this, if requested.
- Information on ICCAN's website[37] suggests that this review is an initial piece of work which forms the basis for "more detailed recommendations and standards, consulting with industry and experts in the field".
- ICCAN's Corporate Strategy 2021-24[38] outlines its intention to "Build on review of insulation to establish best practice for insulation schemes" (Q4 2021-22) and subject to partner availability, "Work with BSI on standards for aviation noise insulation products and application". ICCAN also state that following this, they will "build on best practice by supporting the introduction of new technical standards for insulation".
- We feel that completion of this work will address some of the comments made by stakeholders we interviewed (as outlined above).

Report on the future of aviation noise management – March 2021[39]

- This report sits at the core of what government asked of ICCAN when it was first established – i.e., consider how aviation noise could be managed better going forward, as well as how the framework of regulation should evolve.
- In this report, ICCAN set out to deliver on this objective.
- In terms of stakeholder feedback, we have not had any feedback on this report, as it was published towards the end of our interview period
- However, we feel that it does meet the objectives set out by the government in terms of setting out a framework for regulation and enforcement – though it will be at the discretion of the DfT whether or not to support ICCAN's recommendations.

Overall, we do believe that ICCAN has delivered on the overall function of reviewing research evidence and undertaking/commissioning independent research where gaps in evidence exist. However, as reflected in comments from stakeholders above, we do feel that there is more work to be done in

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[37] https://iccan.gov.uk/wp-content/uploads/2021_03_01_ICCAN_review_of_airport_noise_insulation_schemes.pdf
[38] https://iccan.gov.uk/iccan-corporate-strategy-2021-2024/
[39] https://iccan.gov.uk/iccan-report-future-noise-management/

terms of more effective delivery of this function, and ensuring that work produced is relevant, impactful and actionable. It is clear from ICCAN's latest corporate strategy that they understand that the body of work they have produced to date lays the foundations for impactful/actionable output, and they have made clear intent to build on this body of work during their next work programme.

We would also encourage ICCAN to seek further guidance from experts in the field and stakeholders in terms of the needs and gaps in knowledge in aviation noise. We acknowledge that any work produced will not 'please everyone' and it is expected that any new research will be debated and challenged, however, the feedback that we received on some reports was not necessarily about disagreement (which of course there was, and this is to be expected), however it was that they felt that the research was not "impactful" or effective in "moving the debate forward" or being "bold" enough.

As expressed by a stakeholder from government/regulators all the reports "add value, but there is no silver bullet for noise. [We] welcome [ICCAN] continuing [to produce this work]".

Equally, we encourage ICCAN to engage more effectively with the Department for Transport (without encroaching on ICCAN's independence) to ensure that research produced can ultimately be used to help inform policy decisions.

8. **Monitor and quality assure airports' noise measurements and reporting (such as noise action plans) as well as many of the processes and functions which have an impact on aircraft noise, including future noise forecasts.**

- ICCAN's best practice guidance for airports (discussed above) on how they can engage with communities on noise included recommendations that airports with Noise Action Plans should set up noise forums, and provided guidance on how this can be achieved, in addition to advice for wider engagement.
- ICCAN's review of Noise Metrics (discussed above).
- However, we are not aware of any formal quality assurance of noise measurements and reporting that have been conducted by ICCAN so far.
- ICCAN's latest Corporate Strategy 2021-24[40] does set out a roadmap to review "efficacy of Noise Action Plans (by end of Q1 2021-22) and subject to resource and partner availability "make initial recommendations on whether, and how, they could be improved (by end of Q4 2021-22).
- ICCAN plan to "conclude a review of the efficacy of Noise Action Plans, with full and detailed recommendations on whether, and how, they could be improved" (with a report to be published Q2 2022-23).

9. **Assure the noise modelling used for the night flight regime options.**

- ICCAN has conducted background work on this issue.
- When we approached ICCAN regarding this area, there did appear to be some lack of clarity on what is expected/required by government on this particular function.
- That said, ICCAN did respond to DfT's consultation on night flight restrictions in March 2021[41].

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[40] https://iccan.gov.uk/iccan-corporate-strategy-2021-2024/
[41] https://iccan.gov.uk/iccan-response-dft-night-flight-restrictions-consultation-part-one/

- In addition, ICCAN have stated an intention in their Corporate Strategy 2021-24[42] to "Provide advice and guidance to the Government on its night flight regime for the designated airports" and to "Work with Government following consultation on its policy development" – a timeframe for this has not been set by DfT and will be conducted "as is appropriate".

10. Input to planning inquiries relating to airport infrastructure.

- We are not aware of any work that has been done in this area, and our understanding is that ICCAN would only provide input in this area as and when requested.
- To date, there as only been one request to ICCAN, as they were called in to a planning inquiry into Manston airport, they attended but had to decline giving input as this was during the start of ICCAN's operation (February 2019), and ICCAN felt that they would not be able to provide valuable input.

8.2.2 ICCAN's performance – ability to make impact

One theme that has arisen from many of our interviews, across all different stakeholder groups – is the ability of ICCAN to have an impact on aviation noise management. This is illustrated in our commentary on ICCAN's published work (above).

There is a general consensus that whilst ICCAN have made substantial progress in terms of engaging with different actors in the aviation noise sphere, this has not been followed up with work that has supported the debate or on policy.

It is possible that in its first two years in operation ICCAN were essentially 'laying the ground work' so to speak and aim to produce work with stronger and more targeted recommendations going forward. This is certainly reflected in its ambitious Corporate Strategy 2021-24[43].

We would encourage ICCAN to take on board the comments of stakeholders and ensure that work is targeted towards ensuring actionable output for stakeholders. This may involve greater initial consultation with relevant stakeholders (including government) before commencing specific work programmes. Advice could be sought from other HMG independent commissions, such as the Independent Commission on Freedom of Information and Independent Commission for Aid Impact, etc.

9. Recommendations

9.1 Delivery options

9.1.1 Abolish

There were a few comments from stakeholders, including experts, who suggested that should ICCAN not exist, there would be limited change to the landscape. However, there has been repeated comments from stakeholders who state that there exists a role for ICCAN in communicating complex acoustics to those that they effect.

A few commentators suggested that the function of ICCAN, providing advice and communicating, could be delivered by the Civil Aviation Authority (CAA) who have the data and expertise at their

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[42] https://iccan.gov.uk/iccan-corporate-strategy-2021-2024/

[43] https://iccan.gov.uk/iccan-corporate-strategy-2021-2024/

disposal. However, there were questions raised by some about how that would affect the independence of the advice. In a few instances we discovered that the CAA had been conducting work around reducing aviation noise, but this hadn't been communicated effectively to wider stakeholders (particularly community groups).

Independence is a core principle that ICCAN operate upon, however we have heard opinions that at times this has been at the expense of a holistic approach to the issue of aviation noise (including the economic and environmental aspects) and responding to Government's guidance.

9.1.2 Move out of central government

DfT cited that the overarching objective of ICCAN in their eyes was to build trust between industry, government (central and local) and community. Therefore, whilst we believe there is a role for ICCAN to play, a question could be raised over whether an ALB of DfT is the right place to achieve that.

A large number of community groups and industry representatives provided evidence of the localised nature of the aviation noise issue. One alternative to ICCAN at a local level, was the suggestion that Airport Consultative Committees (ACC)[44] could be 'beefed up' as ALBs from DfT, with extra funding and expertise, that is looking at all the aviation issues, connecting the local with the central, and includes the remit of noise. This localised and holistic viewpoint was shared by some in industry and expert groups, but unfortunately, we were unable to test this approach with community groups.

9.1.3 Commercial model

No evidence was presented regarding a commercial body being able to conduct the role of ICCAN. Due to this review not considering financial aspects of ICCAN, [45]we considered looking at a commercial alternative as 'out of scope'.

9.1.4 Bring in-house

Arguments for ICCAN's inception revolve around the issue of trust and therefore ICCAN prides itself on independence and community groups were consistent that the role of ICCAN be independent. However, as mentioned previously, we believe this independence has come at the expense of developing a holistic view that can support Government policy via DfT. Because of this, as various stakeholders mention, the debate around aviation noise has not translated into actions.

A broad range of stakeholders, when asked, would be open to the CAA having a function similar to ICCAN, but were against the role becoming part of the Department for Transport itself (This was despite the 2017 consultation and its conclusions against CAA holding the role). Such a move would likely improve policy decisions around aviation noise (being part of a well-established, expert ALB, with good links to policy makers).

Due to the scope of the review, we did not investigate the efficiencies that would be achievable by bringing any additional aviation noise function into the CAA.

9.1.5 Less formal structure

Our review did not find a reason as to why the functions of ICCAN needed to be delivered by a formal structure. Although, there was not any available evidence to suggest that informal stakeholder groups could perform the role and deliver benefits to all stakeholders.

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[44] https://www.icao.int/SAM/Documents/2018-ADPLAN/UK_DfT_guidelines-airport-consultative-committees%20(UK).pdf
[45] Department for Transport, Review of ICCAN - Terms of Reference

One option that could be explored, but was not by this review due to time, would be to investigate how the ICCAN expert panel[46] could be relocated to DfT or CAA, to help provide expertise to those who deliver policy. Although, due to the localised nature of the aviation noise debate, an expert panel would be unlikely to be able to provide local advice itself. Therefore, options involving an enhanced ACC (see above) should be considered.

Due to the scope of the review, we did not investigate the efficiencies that would be achievable by a less formal structure.

9.1.6 Delivery by a new executive agency

We found no evidence that a new executive agency would be a useful tool for delivering the functionality envisioned for ICCAN.

Due to the scope of the review, we did not investigate the efficiencies that would be achievable by a new agency.

9.1.7 Continued delivery by an NDPB

In line with the three tests, outlined in the Public Body Review guidance[47], we asked ourselves;

1. Is this a technical function, which needs external expertise to deliver?
2. Is this a function which needs to be, and be seen to be, delivered with absolute political impartiality?
3. Is this a function that needs to be delivered independently of ministers to establish facts and/or figures with integrity?

Is this a technical function, which needs external expertise to deliver?

All stakeholders agree that the aviation noise debate is incredibly scientific and complex, with many factors involved, such as safety and ecological impact. Therefore, expertise is required to deliver the function. At present, ICCAN deliver this via external consultancies and the recently established expert panel.

Is this a function which needs to be, and be seen to be, delivered with absolute political impartiality?

For test two, the function, we believe should be impartial and consider all stakeholders, however, as mentioned in the section on objectives, ICCAN perform its role on behalf of Government as the sponsor and should provide advice on policy. Because of this, we don't believe ICCAN should operate with 'absolute political impartiality'.

Is this a function that needs to be delivered independently of ministers to establish facts and/or figures with integrity?

On test three, stakeholders stated that facts and figures should be conducted independently to build trust.

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[46] https://iccan.gov.uk/about-iccan/iccan-affairs/iccan-expert-panel/
[47] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/802961/Tailored_Review_Guidance_on_public_bodies_-May-2019.pdf

10. Conclusions

a. Is there still a need for ICCAN as a public body?

One of the main drivers of setting up ICCAN following the recommendation of Davies Commission, was to help build back trust between communities and the aviation industry and government.

Whilst we recognise that there have been improvements in trust between communities and the industry (specifically airports) there remains issues, and it is evident that a legacy of distrust remains. The sheer existence of ICCAN (or a body such as ICCAN) and its objective of helping to build trust and its position as an independent body are a clear message of commitment to instilling trust.

Our interviews with stakeholders indicate that in the case of dismantling ICCAN this could erode some of the positive ground made in building trust and would be a negative message to communities in terms of government commitment to the effective management of aviation noise. If ICCAN were to be dismantled, or absorbed into other structures, there would remain a need to have an independent voice on aviation noise, if purely to reassure communities.

In addition, it was expressed by many of the stakeholders we interviewed that there is a clear and necessary role for ICCAN (or another independent organisation) to play in terms of translating and communicating the complex issues around noise into language and formats that are understandable and digestible for communities, in addition to communicating the concerns and experiences of communities to government, the aviation industry and wider stakeholders involved in aviation noise.

b. Is ICCAN's current format most optimal for its function?

Due to ICCAN's ability to make an impact, it could be an option for ICCAN as an organisation to be dissolved and its role split, whilst retaining the mandate for furthering the aviation noise debate for all stakeholders. Since aviation noise is localised at, and specific to each airport, it might be more appropriate for issues to be handled at the local level by an enhanced Airport Consultative Committee (ACC) who could ensure best practice (from wherever it is generated, be it an expert panel or international standards etc) is followed. Such a revised ACC could provide accessible information and advice on the holistic environment (economic, social, environmental aspects) to all local stakeholders.

Strategically, focussing a role for ICCAN at a local level, to work with local airports and campaign groups may be more suitable – since a lot of the decision-making associated with the experience of noise and noise management are taken in planning (as opposed to airspace management). ICCAN may find itself more impactful in a more local-focussed role.

In terms of policy level advice to DfT, this could be provided by the existing ICCAN expert panel (who would remain at arm's length to DfT), receiving clear communication from DfT, therefore supporting Government decision-making by providing direct independent advice and information.

It should be noted that these options have not been explored in this review, due to time constraints, and we propose that DfT should take these into consideration.

c. Efficacy and Effectiveness of ICCAN as it currently stands?

As outlined in our review of ICCAN's functions, we feel that there is work to be done in terms of efficacy and effectiveness, should government recommend/decide that ICCAN continues in its current format.

Specifically, we feel that ICCAN would benefit from: streamlining its work programme, consulting more with government on the needs of government when it comes to policy, greater engagement with the industry (or addressing industry concerns surrounding engagement with ICCAN) and being clearer in terms of recommendations and outputs in their work.

d. ICCAN's vision of statutory consultee status

In terms of ICCAN's seeking of Statutory status (in the form of becoming a statutory consultee), there is evidence from ICCAN's survey of stakeholders of broad support of this (ICCAN cite 88% of respondents from their "feedback on ICCAN's Emerging view on the future of aviation noise management document[48]" either agreeing in full or in part to this proposal.

However, we are also keen to point out that the views expressed to us by some stakeholders were in opposition to this proposal (particularly from the aviation industry), and we feel that if statutory status were to be given to ICCAN (if ICCAN were to continue in its current format), this could risk alienating some of the industry and creating some difficult working relationships. It may subsequently have impact on development of policy, if industry is not in full cooperation with ICCAN – therefore we would caution against giving ICCAN statutory status in the short term and believe that this option can be re-considered in the medium term (following the conclusion of ICCAN's programme set out in the 2021-24 Corporate Strategy).

We also believe that if ICCAN were to continue in its current format, that there is work to be done for ICCAN to establish further credibility – particularly with Industry and Academic stakeholders. As expressed from one airport in England: if "ICCAN can establish its credibility with all stakeholders through the development of clear and balanced guidance, then a longer-term aspiration for a statutory role might be more broadly supported… we do not yet believe that ICCAN has established itself across the UK as an expert, credible and independent body that is trusted by all actors across the aviation noise debate".

The body of work that ICCAN has produced has largely been met neutrally (albeit with criticisms on its ability to make an impact), and there is a general impression that ICCAN have covered a lot of ground in the past two years and displayed a steep learning trajectory as a young organisation. However, there is also a view that there remains areas of technical expertise and industry knowledge that need to be developed before statutory status can be seriously considered

11. Appendix

List of respondents interviewed:

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[48] https://iccan.gov.uk/future-aviation-noise-management/

Category	Organisation	Interview date and time
Communities / campaign groups	Edinburgh Airport Watch	10:30am - Monday, 8 March 2021
ICCAN - Secretariat	ICCAN	02:00pm - Monday, 8 March 2021
ICCAN - Commissioner	ICCAN	05:00pm - Monday, 8 March 2021
Aviation industry	Edinburgh Airport	09:30am - Tuesday, 9 March 2021
Aviation industry	AOA	10:45am - Tuesday, 9 March 2021
DfT	DfT	11:30am - Tuesday, 9 March 2021
Aviation industry	Heathrow	03:45pm - Tuesday, 9 March 2021
Communities / campaign groups	LADACAN	10:00am - Wednesday, 10 March 2021
ICCAN - Secretariat	ICCAN	12:00pm - Wednesday, 10 March 2021
Aviation industry	Sustainable Aviation	01:15pm - Wednesday, 10 March 2021
Aviation industry	Belfast International	02:30pm - Wednesday, 10 March 2021
DfT	DfT	04:00pm - Wednesday, 10 March 2021
Communities / campaign groups	Aviation Communities Forum	09:00am - Thursday, 11 March 2021
National & local government / regulatory bodies	PHE	02:00pm - Thursday, 11 March 2021
Government/Regulator	Welsh Government	09:45am - Friday, 12 March 2021
Experts / academics	Noise Abatement Society	11:00am - Friday, 12 March 2021
Aviation industry	Luton	02:30pm - Friday, 12 March 2021
ICCAN - Commissioners	ICCAN	8:30am - Monday, 15 March 2021
Other Bodies	STACC	11:00am - Monday, 15 March 2021
National & local government / regulatory bodies	CAA – ERCD	12:15am - Monday, 15 March 2021
Communities / campaign groups	Aviation Environment Federation	02:00pm - Monday, 15 March 2021
Airport Consultative Committees	UKACCs / Birmingham Airport ACC	08:00am - Tuesday, 16 March 2021
National & local government / regulatory bodies	CAA – Policy	09:15am - Tuesday, 16 March 2021
Aviation industry	Manchester Airport	03:00pm - Tuesday, 16 March 2021
Aviation industry	British Airways	04:15pm - Tuesday, 16 March 2021

Aviation industry	Airbus	09:00am - Wednesday, 17 March 2021
Communities / campaign groups	HACAN	11:00am - Wednesday, 17 March 2021
Airport Consultative Committees	Heathrow Community Engagement Board	12:30pm - Wednesday, 17 March 2021
Aviation industry	Gatwick Airport	02:00pm - Wednesday, 17 March 2021
Communities / campaign groups	Teddington Action Group	03:30pm - Wednesday, 17 March 2021
DfT	DfT	10:30am - Thursday, 18 March 2021
Experts / academics	Institute of Acoustics	02:00pm - Thursday, 18 March 2021
Aviation industry	AICES	05:15pm - Thursday, 18 March 2021
Communities / campaign groups	CAGNE	10:00am - Friday, 19 March 2021
Government/Regulator	SASIG	11:30am - Friday, 19 March 2021
Communities / campaign groups	SSE	12:45pm - Friday, 19 March 2021
Communities / campaign groups	Melbourne Civic Society	03:00pm - Friday, 19 March 2021
Government/Regulator	NATS	04:15pm - Friday, 19 March 2021
Experts / academics	MMU	01:00 pm Monday, 22 March, 2021
Government/Regulator	DEFRA	02:30pm - Monday, 22 March 2021
Aviation industry	Birmingham Airport	11:00am Tuesday 6 April, 2021
ICCAN - Secretariat	ICCAN	09:00am - Wednesday, 7 April 2021
National & local government / regulatory bodies	ACOG	12:30pm Wednesday 7 April 2021
National & local government / regulatory bodies	CAA – ERCD	03:30pm - Wednesday, 7 April 2021

List of written submissions:

Northern Ireland Executive	
Damian Hinds MP	Member of Parliament for East Hampshire
Philip Davies MP	Member of Parliament for Shipley

ICCAN Aviation Noise Survey Development Project Advisory Board

List of representatives in ICCAN's Aviation Noise Attitudes Survey Advisory Board (as per their terms of reference):

Aviation Environment Federation

Civil Aviation Authority

Department for Environment, Food and Rural Affairs

Department for Transport

Public Health England

Sustainable Aviation

Specialist Acoustics Advisor

Survey Methodologist

Community groups x 3