

ICCAN's first Corporate Strategy 2019-21

What do you think about our planned activity for the first two years?
(approx 400 word limit)

We agree with all the areas of planned activity you have set out, but would like to amplify upon two of these:-

1. We are not clear whether ICCAN intend to look at compensation beyond improved noise insulation schemes (and we understand the government have stated an intention to do so). Whilst offering improved insulation schemes may be very welcome measures for those who were historically overflowed as part of a policy of minimising aircraft noise impact, such compensation is wholly inadequate for communities who might find themselves newly overflowed.

As with building terrestrial highways, compensation for such communities (where the overflight is greater than de minimis) must include loss of amenity, and diminution in property value as applies under the Land Compensation Act.

We believe that such compensation should also be retrospective back to 2012, to take account of airspace changes which overflowed new communities at a time when new technology was in our opinion being rushed in without proper advance research, the effects of aircraft noise were less understood, and generally government and the industry were less enlightened about the life changing impacts upon communities newly overflowed.

Such compensation could be funded from the introduction of fuel duty, VAT or a frequent flyers' levy. (It will also provide a fiscal incentive for all other avenues to be exhausted before overflight of new communities is contemplated, which should always be the approach taken in any event where airspace change is contemplated).

2. In reviewing metrics used for measuring noise, we also hope that ICCAN will look at whether a new metric is required alongside existing ones, which does not employ the methodology of 'averaging' noise over a period of time.

In our view what is desperately needed is a metric capable of measuring maximum aircraft noise level at a point on the ground against number of ATMs over a period of time at that location below 7,000 feet. Set alongside the above measures, this would provide a more realistic and rounded measure of aircraft noise than the hitherto reliance on metrics which employ 'averaging'.

Given ICCAN's remit, do you think there is anything missing from the strategy?

One vital issue we would like to see added, is for ICCAN to independently assess, or to press for an independent assessment by a respected external research body, of the passenger and ATM growth statistics upon which much of the Airspace Modernisation Programme and the Green Paper Aviation to 2050 are predicated.

As part of this and in the interests of transparency, the full assumptions upon which growth forecasts have been made should be published, which would also bring into the public domain the extent to which alternative growth scenarios have been examined in generating these growth forecasts (for example based upon growing awareness and concern amongst the public, especially in the last two years, of 'green' issues in general and the need to reduce reliance on carbon-based energy in particular, and whether and to what extent modelling has been undertaken into the effects on growth where government might intervene by introducing a progressive tax upon air travel/frequent flyers levy).

Do you have any further comments? (approx 400 word limit)

We trust (from the remarks on page 5 of the Strategy document in particular) that ICCAN's focus on research into the effects of noise will look especially at the non-acoustic effects of noise, which has been a traditionally neglected area. Whilst both the always overflowed and the newly overflowed are subjected to the direct acoustic effects of noise, the non-acoustic effects disproportionately impact the newly overflowed (e.g. psychological effects of loss of previous amenity/home life, sense of unfairness, financial loss/effect on retirement) and could turn out to be more profound than the direct acoustic effects.