



Mr Rob Light,
Head Commissioner, ICCAN
Spaces
Station View
Guildford
Surrey GU1 4AR

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

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Dear Mr Light,

I am writing on behalf of the Mayor of London in response to the initial consultation of the Independent Commission on Civil Aviation Noise (ICCAN). It will not surprise you to hear the noise impacts of aviation are a serious and ongoing worry for hundreds of thousands of Londoners, who suffer from greater exposure to aircraft noise than any other part of the UK. The Mayor is greatly concerned by the consequences for public health and quality of life.

The Airports Commission ultimately called for an effective, independent noise regulator with real power, which was welcome. But it is clear that despite the concerns raised by the Mayor of London and others, ICCAN has been established by Government to be none of those things, with no greater power than providing advice. ICCAN's automatic disbandment after two years serves to severely curtail its independence, wholly dependent on Government for its continued existence beyond that point. I hope that, despite these inauspicious beginnings, ICCAN will not propagate the narrative that exposing millions to significant aircraft noise is just a price worth paying – but will actively seek to champion the rights of local communities to reduce their noise exposure.

As you make reference to, the key evidence already exists, notably the latest World Health Organisation (WHO) Guidelines and the Government's own Survey of Noise Attitudes (SONA), which has also highlighted the increasing public sensitivity to noise. Likewise there are several credible studies – some directly related to UK airports – which demonstrate the impact of aviation noise on health and cognitive ability. ICCAN could play an important role if it were to help ensure these were fully incorporated into national noise policy.

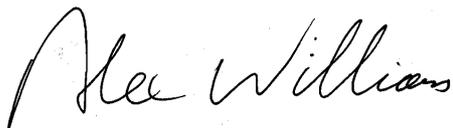
The functioning of the airspace change process remains an issue and the introduction of new air navigation technologies makes this particularly sensitive. The approach under which a range of different flightpath scenarios are presented for consultation, along with the impacts of each, is a broadly sensible

one, albeit key will be how the final determination is made. But there is a real issue with the length of the process, with airports opting for one or even two interim consultation stages, which seek views on flightpath principles. We would question the merits of asking the public highly theoretical questions in isolation from the actual impacts – an exercise that often amounts to asking: do you want the noise or should someone else get it? There is also a risk of consultation fatigue when three consultations are held on the same issue. In general, a single consultation which sets out flightpath options and their actual impacts – using a wide range of metrics and thresholds – is what the public would find most informative in reaching a view. Some of the questions around principle arise from the national policy vacuum in this domain, which ICCAN could assist with by providing guidance.

You mention the possibility of turning your attention to other matters, notably helicopters and drones, and in this you could serve a very useful role. The regime that governs helicopter flights over London is out of date and does not take account of advances in helicopter technology nor the spatial development of London. There remain a multitude of questions to be addressed in relation to drones and their regulation which it would be simpler and more effective to shape now, while the industry is still in its infancy. In both cases, ICCAN could play its part in filling the vacuum left by others.

You are right to identify trust as sorely lacking between communities and the aviation sector. Too often, the approach of the industry – and those regulating it – is that the public will never accept the change being proposed, so better not to engage with them or do so in a very limited, non-transparent way – which risks misleading them about the change and its impacts. This cannot go on. ICCAN must help bridge the trust gap by holding the industry, regulator and Government to account, ensuring open, transparent engagement, underpinned by an honest, accurate understanding of the impacts. If ICCAN can do this and work to reduce the exposure to severe aircraft noise experienced by communities in London and across the UK, then ICCAN will defy expectations and demonstrate its value. We are ready to work with ICCAN and others in securing this.

Yours sincerely

A handwritten signature in black ink that reads "Alex Williams". The signature is fluid and cursive, with the first letters of "Alex" and "Williams" being capitalized and prominent.

Alex Williams

Director of City Planning

Email: alexwilliams@tfl.gov.uk

Direct line: 020 3054 7023