

**ICCAN First Strategy 2019-2021  
Consultation  
Response from Richmond Heathrow Campaign (RHC) 16 June 2019**

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***Question 1. In your view, how far does the Strategy address the key issues around the management of aviation noise?***

*Does not address at all 1,2,3,4 Addresses All key issues.*

**Answer ranking 2**

*Please briefly explain your rating.*

*The following Noise issues not seemingly addressed by ICCAN's 2 year Strategy:*

1. A noise objective that apportions noise across communities is missing from national and local noise policies. This is a major gap in the management of aviation noise. RHC has recommended a local Heathrow noise objective to Heathrow, the CAA and the DfT and we would be pleased to share that with ICCAN.
2. UN/ICAO Balanced Approach for noise management is a key international noise policy but its ineffective application in the UK needs to be addressed without delay.
3. Aviation noise and in particular the UN/WHO 2018 Guidelines need to be placed on legal footing without delay (similar to air quality).
5. Heathrow's 3<sup>rd</sup> runway expansion adds 43 mppa at Heathrow, of which 16 mppa are International-to-International (I-I) transfer passengers (source DfT). Aviation Passenger Duty exemption for I-I transfer passengers (mostly at Heathrow) should be abolished promptly. I-I transfers add substantially to Heathrow's noise climate. They are of no economic value to the UK (source consultants PW and Oxera).
6. Heathrow's 3<sup>rd</sup> runway expansion of 43 mppa scavenges 17 mppa from other UK airports, thus concentrating noise over London that would otherwise be dispersed across the UK (source DfT). This imbalance needs to be addressed promptly for environmental and economic reasons.
7. The APNS June 2018 for Heathrow' expansion declares operational capacity of at least 740,000 flights a year. RHC estimates potentially much higher operational capacity and

consequentially higher noise emissions. The environmental capacity in our view is substantially less than 740,000 flights a year. Bridging the difference between operational and environmental capacity needs to be addressed promptly.

8. Heathrow's 3<sup>rd</sup> runway expansion adds only 10 mppa UK terminating passengers (43 mppa less 16 mppa I-I & less 17 mppa from other airports, i.e. 77% of additional capacity) of which only one mppa are business passengers. 6.4 mppa are leisure UK resident passengers. (cf 435 mppa total UK passengers in 2050) (source DfT). The minimal benefits of Heathrow expansion are outweighed by the cost to human health from noise and NOX emissions and the cost to climate change from GHG emissions. Environmental Demand Management needs to be introduced urgently to satisfy environmental constraints, including noise.

9. Noise costs (and other environmental costs) have been substantially under estimated by the Airports Commission and DfT in their webTAG impact assessments of Heathrow's expansion. There needs to be urgent re-assessment so that the environmental capacity can be determined and this includes an assessment of the noise impact.

10. Community experience of the Airspace Change Process for a 3<sup>rd</sup> runway at Heathrow so far has been highly deficient. The principle of noise concentration was forced through in 2018 by Heathrow with the CAA's compliance without proper consideration of the noise objectives (see (1) above). Proper engagement with communities failed. The process (CAP 1616) is significantly deficient. The current ACP for Independent Parallel Approaches to Heathrow continues in the same deficient manner. The failure of the ACP to recognize flight path traffic volumes is a major failure. We have still to assess the current CAA consultation (PPR) that seeks to remedy this deficiency but from initial examination it falls well short.

11. The ANPS for Heathrow expansion contains policies on four environmental issues: noise, air quality, climate change and surface access. Converting these policies into planning conditions so that capacity is only released as the conditions are satisfied needs urgent attention starting with Heathrow's consultation from 18 June 2019. There are just months before draft conditions are submitted by Heathrow to the planning inspectorate. Communities are little prepared.

***Question 2. Do you agree with our overall aim to improve public confidence and trust in the management of aviation noise?***

**Answer. No.**

*If you answered no, please briefly explain why*

Trust and public confidence will only arise if communities witness decisions being made in a fair, proportionate, rational and objective manner without obsfucation. While trust and confidence building are essential and in that we agree with ICCAN's aim. But it is the decisions that communities are interested in and ICCAN's aim, we respectfully suggest, should focus on the decision process for specific decisions and the decision outcomes. With regard to Heathrow expansion the set of enabling decisions are already being made and these need to be urgently addressed. ICCAN's aim risks critical decisions being made while trust and confidence are being built by which time it will be too late. RHC is opposed to Heathrow expansion, partly because we believe the evidence strongly suggests Heathrow is not full and there is ample runway capacity across the UK but also because expansions harms the UK aviation market and the UK

economy and there are excessive environmental costs. We are not seeking help from ICCAN to support our campaign per se but to ensure the decisions are rational and timely.

***Question 3. Have we got the right strategic objectives for our first two years?***

**Answer. No**

*Please briefly explain your answer*

ICCAN Objectives:

1. Increase trust, transparency and clarity in the aviation noise debate.
2. Promote consistency, responsibility and accountability within the industry and beyond.
3. Establish our expertise, authority and credibility.

These are all worthy objectives and may well be suited to aviation issues across the UK. However, RHC's specific concern is with the expansion of Heathrow and the enabling decisions are being taken already - often irreversibly. Our concern is that referred to in our response to Question 2 on the need for ICCAN action regarding specific decisions relating to Heathrow's expansion and airspace modernisation. We realise ICCAN was established a year behind the Government's initial intention and that ICCAN faces a real challenge to engage with the Heathrow expansion in a very narrow window of opportunity.

***Question 4. What do you think about our planned activity for the first two years?***

We support the individual projects proposed. Our concern is that the outcomes will be too late to feed into critical decisions regarding the expansion of Heathrow. Our response to Question 2 prioritises issues we would rather see as part of the work plan, admittedly these are Heathrow orientated and we recognise there are issues faced by communities across the UK deserving ICCAN's attention. The risk is ICCAN will be overstretched.

***Question 5 Given ICCAN's remit, do you think there is anything missing from the strategy?***

**Answer. Yes**

Unfortunately, communities have little influence on aviation decisions and in theory they are forced to seek legal remedies. Communities do have strength in numbers but campaigns are not ideal for anyone seeking rational decisions. Seemingly, there is nothing in the strategy that recognises the disproportionate power of the industry and communities. Trust, clarity, accountability etc can help but industry is committed to the profit motive and understandably needs to make a financial return. Environmental costs are almost always of lesser priority but the polluter should be made to pay. We would like ICCAN to adopt that as a principle.

*Do you have any further comments?*

**Answer. No other than to say thank you for the consultation.**