

From: [REDACTED]
To: [Manston Airport](#)
Subject: Noise
Date: 14 June 2019 18:21:24
Attachments: [ICCAN Corporate Strategy - For consultation.pdf](#)

FROM: Chris Lowe **Interested party: 20014275**

Dear ExA,

Some more new evidence.

Noise

The Independent Commissioner for Civil Aviation Noise (ICCAN) recently published a Consultation on their draft Corporate Strategy.

The attached document provides information on this, and I would draw the Examining Authority's (ExA's) attention to the following sections.

1 Background to ICCAN (page 5 on)

The Government and others in the air transport industry, had previously considered that the Civil Aviation Authority (CAA) provided expertise and sufficient independence despite it being funded by the air transport industry, for there to be no need for another body. However they were persuaded by the overwhelming evidence from all over the country that people affected by aircraft noise were being ignored by the industry, with increasing evidence of the adverse effects on people and their health.

Hence ICCAN was set up to provide that independent, non-statutory arms-length body, as they describe in the first paragraph of this section.

2 Although new, they have already made some conclusions. For example (with my emphasis):

Page 5: "Disturbance from aviation noise is an inherently personal experience. We know from our early engagement that the effects can be deeply disturbing and have a detrimental effect on people's quality of life and health. How much – and in what way – an individual is affected by aviation noise cannot be explained or described by any graphs, metrics, maps or other data. **Nor can the bigger-picture benefits to the economy realistically be expected to compensate those who suffer from aviation noise.**"

This means that the proposals for an airport at Manston are completely unacceptable.

3 Page 6 goes on to say:

"We want to see the management of **aviation noise and its effects on people and communities becoming a key factor** in the future decisions of government, airports and airlines, such as airport expansion or airspace change."

Also, in their description of objectives and planned activity, ICCAN says, on Page 16:

"It is imperative that the aviation industry reviews its priorities and puts noise higher up the decision-making agenda, holding to account those responsible for breaches of commitment."

From the beginning, the Applicant has fudged the noise issue, and clearly it is not high on its priorities, and has tried to minimise any actions that it might need to take, as shown for example, by responses to its inadequate Noise Mitigation Plan.

4 It also suggests that:

"As aviation noise is a complex subject, we will require some time to establish our expertise and produce our first best practice guidance",

so this means that the ExA's Report to the Secretary of State (SoS) should recommend that if it is intended to approve the Application, then the final decision should await this Guidance, to ensure that the decision is in accordance with best practice. As the Applicant has taken a very long time to reach this stage, a relatively short extra waiting time is not material.

5 On Page 7, ICCAN notes:

"Maps with contour lines based on a particular measure of noise give the impression that there is a hard line between those that are affected, and those that aren't – in fact, many of the community representatives we

have met in our initial meetings are from areas far outside the noise contour maps published by airports.” This confirms my own situation just north of Canterbury, seemingly outside the area affected by Manston aircraft, being affected by such aircraft flying over us and not following the expected flight paths. As a result of my complaints, Manston Airport always said the planes were following normal procedures! I would also note that we were disturbed by an aircraft from Birmingham which was flying at 23,000 feet, despite being indoors, and triple glazed windows all shut!

6 Finally Page 17, says:

“If asked, provide expert noise advice to the Secretary of State for called-in decisions on airspace changes “. ICCAN has not been in a position to help the ExA so far, so it is essential, as noted above, that that the ExA recommends that the SoS does ask for ICCAN’s advice, otherwise there is an unacceptable risk that if approved, the scheme would not meet best practice.

I hope this helps the ExA.

Thank you.

Best wishes,

Chris Lowe

Corporate Strategy 2019 - 2021



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Foreword



Welcome to the first Corporate Strategy from the Independent Commission on Civil Aviation Noise (ICCAN).

Our Strategy covers the first two years of ICCAN's work, set into the context of what we see as our short, medium and long-term priorities. We recognise that ICCAN was created because there was acceptance from most parties in the aviation debate that previous ways of working on aviation noise were no longer effective. So far, we have generally found trust between the industry and communities to be in a negative place. That's why our first role has been to start talking or, to be more precise, start listening.

Within our first six months we will have visited the twenty busiest UK airports, as well as meeting numerous airlines, community groups, academics, trade associations, regulators and experts. We thank you for the warm welcome, the frank conversations and the genuine goodwill. These conversations have

helped us understand the issues from a wide variety of perspectives, and identify many of the challenges we will need to address.

As a new organisation, without the history of aviation on our shoulders, we intend to ensure we look with a fresh set of eyes at what is effective, what isn't effective, and why. We are clear that we expect our work to challenge the approach of everyone involved in the issue of aviation noise.

ICCAN appreciates the strong need to change the culture of how aviation noise is managed in the UK. We recognise this will take time, so to assist we intend to introduce proposals that we believe will lead to culture and practice changing for the better.

While we are setting out here what we are seeking to do in the short-term, we are also conscious that change in this industry often takes longer than many would like. That's why we also point to some of the issues which we believe we need to start to address in the medium and longer-term.

Our remit is not to stop airports growing; it is to ensure that aviation noise in the future affects people and communities less. Our early insights suggest a complexity of data and process alongside insufficient and inconsistent transparency from the aviation industry over a

significant period of time. Residents and community groups have been clear to us that they have little confidence in the processes that regulate aviation noise.

How we all experience noise is a very personal matter. We are conscious that no matter what method of noise measurement adopted in the future, the experience of the individual in their own home must always have a role in the way aviation noise decisions are made.

We also appreciate that innovation and new technology will play a significant factor in how noise is managed in the future. ICCAN will look to encourage the best ways to incentivise new ways of working.

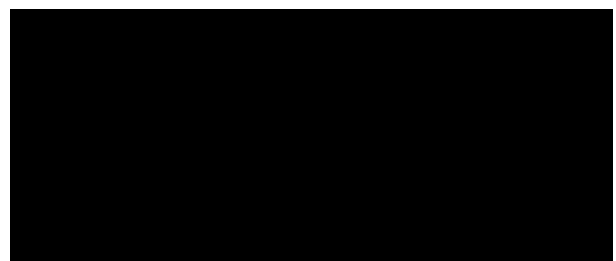
Culture change must mean more than just a different way for airports to engage their communities. We aspire to see the aim of reducing noise drive investment and management decisions in the boardrooms of airports and airlines, and we will seek to encourage incentives to achieve this.

There are a wide variety of challenges facing aviation in the next few years. Irrespective of growth, airspace modernisation will dominate much of the decision-makers' time and we are determined to ensure that managing the effects of noise is a key determinant in this process.

We are determined that ICCAN will become an organisation which makes evidence-based decisions that achieve the right long-term outcomes. To do so, we have to be confident the evidence we use is both comprehensive and robust. Over next two years we will review the different aspects of the evidence base used to inform decisions by the Department for Transport, the Civil Aviation Authority and local authorities.

While we were set up and are funded by the Department for Transport, my fellow commissioners and I are fiercely protective of our independence. We are not just another part of the governance or regulatory establishment but an independent body free to challenge everyone in a quest for better aviation noise outcomes.

Thank you for taking the time to read ICCAN's first strategy. We always welcome your feedback and comments.



Rob Light

Head Commissioner
ICCAN

Executive summary

This document sets out the first Corporate Strategy for ICCAN, the Independent Commission on Civil Aviation Noise.

As a new organisation, created to act as an independent, impartial voice on civil aviation noise, ICCAN has started as it means to go on, in full listening mode.

Our Head Commissioner and key officials have already met with over 100 organisations and individuals with an interest in aviation noise, ranging from communities and their representatives, to the aviation industry, noise experts and academics.

We are consulting widely on this Strategy, sending it out to around 1,000 key contacts for their feedback via an online survey. The comments we received through this consultation, as well as an event held with community groups to discuss the Strategy and our many meetings, have helped to shape its contents.

This has led to a set of objectives that are ambitious and realistic, and a plan for the

next two years with activities that will be stretching but achievable for a lean organisation with a big remit to deliver.

With a two-year aim to improve public confidence and trust in the management of aviation noise, by building our expertise, credibility and profile across the UK, ICCAN's strategic objectives are to:

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

ICCAN will be reviewed in two years' time and a decision will be made about its future direction as an organisation, including whether to give it increased powers. In the meantime, ICCAN's role is threefold: to listen, to evaluate and to advise.

Background to ICCAN



ICCAN was established by the Government in January 2019 as an independent, non-statutory advisory arm's length body, asked to act as the credible and impartial voice on all matters relating to civil aviation noise.

Our Head Commissioner, Rob Light, was joined by three other commissioners (Colin Noble, Howard Simmons and Simon Henley) in March 2019. Since our establishment, we have been travelling the country, hearing from many groups and individuals about their ideas for how ICCAN can best contribute to the debate on aviation noise.

We've been building a team led by the Secretary to the Commission, Sam Hartley, which will support us in our work. We've also been establishing an office

and have been developing this, our first corporate strategy.

An independent body such as ICCAN was first proposed in the Airports Commission report in 2015. Our history can then be tracked through Government consultations in 2017¹ to the point when the Government confirmed that it would establish ICCAN in its Consultation Response on UK Airspace Policy publication at the end of 2017. Last year, the Government's publication *Aviation 2050 – The future of UK aviation* further set out how ICCAN might participate in the debate around aviation noise. And the Government has given us draft Terms of Reference, which include a number of suggested activities we might undertake.

Disturbance from aviation noise is an inherently personal experience. We know from our early engagement that the effects can be deeply disturbing and have a detrimental effect on people's quality of life and health. How much – and in what way – an individual is affected by aviation noise cannot be explained or described by any graphs, metrics, maps or other data. Nor can the bigger-picture benefits to the economy realistically be expected to compensate those who suffer from

¹ Department for Transport (2017): UK Airspace Policy: A framework for balanced decisions on the design and use of airspace; and response.

aviation noise. These factors have helped us frame our initial thoughts about our strategy.

We are determined to get to a place where people feel their concerns are listened to and where the impact of aviation noise is not just talked about in complex terms or by reference to lines on maps.

We want to see the management of aviation noise and its effects on people and communities becoming a key factor in the future decisions of government, airports and airlines, such as airport expansion or airspace change. We will be looking to reach a more trusted position on the economic benefits of aviation, and ensuring they are shared with communities that are most affected by noise.

As aviation noise is a complex subject, we will require some time to establish our expertise and produce our first best practice guidance. We will do this as quickly as we can.



Early engagement and insights

Our first challenge has been to get to grips with, and understand, the issues around aviation noise. We have done so by spending much of the first months of our existence meeting with people from many different sides of the debate. We've met community groups and individuals, government (central, devolved and local) and regulators, other non-governmental organisations, airports and airlines, academics, trade associations, and many others². We will continue to see public-facing engagement as a key part of our role and remit.

Two key themes have emerged during our early engagement and these, as well as the draft Terms of Reference provided to us by the Government, have helped to shape this first strategy:

Trust

It's clear to us that, in some areas of the country, the trust between airports and their communities has broken down. This might be due to broken promises made during previous airport expansion, development or airspace changes, or a perceived lack of transparency in the way airspace change decisions are made. Often when airports are making attempts to mitigate against the impacts of noise, they find it hard to communicate this to the community because of the breakdown in trust.

² You can find details of our engagement to date at <http://bit.ly/2WhypQh>

Airports – both individually and as part of wider industry groups, such as Sustainable Aviation – tell us they are making efforts to address the environmental and community impacts of aircraft movements. We will test the success of these attempts, and share initiatives that work with communities.

We'll be looking at the roles of Airport Consultative Committees in relation to noise, and other models of engagement groups that are intended to bring together community, industry and elected representatives.

We're determined to try to heal that breakdown of trust where it exists, and build on good practice and the strong relationships that do exist in some parts of the country.



Clarity, consistency and availability of information

Aviation noise is a complex subject which can be measured in different ways. This is not helped by over-use of acronyms or technical explanations about noise levels. Maps with contour lines based on a particular measure of noise give the impression that there is a hard line

between those that are affected, and those that aren't – in fact, many of the community representatives we have met in our initial meetings are from areas far outside the noise contour maps published by airports. The myriad pieces of legislation, regulation and guidance – some international, some continental and some domestic – combined with the many responsibilities held by different organisations, result in a fog of accountability.

The complexity of the issues, and the amount of data and variables published, can privilege those with the time to spend reading through often lengthy materials over others who cannot. And amid all this complexity it is easy to forget that there are people suffering detrimental effects of aviation noise. We're determined to work towards clearer, simpler access to consistent information for all the community to help address these issues.

We're also keenly aware of the gaps in available information around longer term research, such as the links between noise disturbance and public health, and attitudinal surveys of those affected by noise. These gaps present opportunities to fill them. We will scope and make recommendations on what further studies would best help inform the strategic management of aviation noise.

Our strategic objectives

The issues of trust and clarity have informed our first strategic objective – to **‘increase trust, transparency and clarity in the aviation noise debate’**. We’ll do this by providing guidance on issues such as the measurement of noise, the way in which airports engage and communicate with their communities, and the transparency of the information published. We will begin to consider longer-term research. We set out more detail on what we intend to do, and when, on page 15.

Our second strategic objective – to **‘promote consistency, responsibility and accountability within the industry and beyond’** – aims to bring further rigour to decision-makers or those with authority in the sector. This applies to airports and airlines, manufacturers, industry bodies and representatives, as well as to decision-makers such as central, devolved and local government, ministers, National Air Traffic Services and the Civil Aviation Authority. It seems to us that there is much that can be done to improve the consistency of approach to issues such as the use of older (and hence noisier) aircraft, the effects of night flights and how they could be better regulated, the operating procedures used by airlines and pilots during take-off and landing, the use of airspace and the impact of routes used by one airport on another, the speed and ease with which

decisions about airspace use are taken, and the use of land for development around airports. We’re also concerned that the issues of mitigation, compensation and community benefit are becoming conflated, and so we will look to ensure that airports do not rely only on mitigation against the effects of noise, and do more to share the proceeds of their growth for the benefit of the whole community. There are good examples of such processes in some parts of the country – we’ll look to see these expanded upon in other areas.

We set out how we intend to promote this consistency, responsibility and accountability on page 16. Our starting point is to do so by building consensus, and driving improvements in the way noise management is approached through behavioural change. But as we near our two-year review we won’t hesitate to recommend to the Government that enforcement powers should be introduced, should we consider at that point that the industry and decision-makers are not acting in the best interests of their communities, or not taking their concerns seriously.



We won't be successful in achieving our aims without **establishing our expertise, authority and credibility**. This is our third strategic objective – one that will be unique to our first two-year corporate plan, given our recent establishment. As part of our expertise, we will bring together a panel of experts on whom we can rely for advice. The strength in being such a new organisation is that we come to the debate without history or pre-conceived ideas. The challenge of being a new organisation is that we will need time to build our expertise and knowledge of the issues.

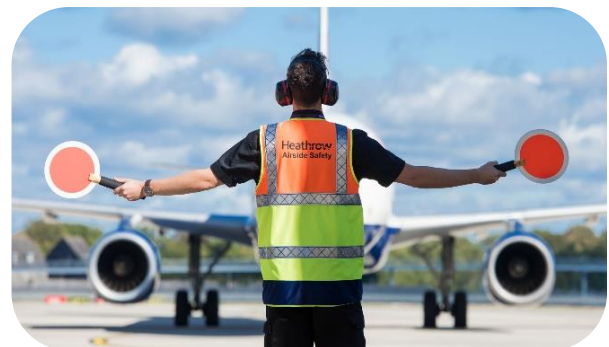
As part of this objective, we intend to quickly get to a position where we can provide expert advice on airspace use and modernisation when called upon, and evidence to planning enquiries or called-in decisions on airspace change proposals. We will also expand our knowledge of General Aviation, helicopter flights, and future challenges such as supersonic flight, drones and personal air vehicles.

We set out what specific activities we expect to conduct in the next two years to achieve our objectives on page 17.

What our early engagement has also shown us is that there are vast expectations in what ICCAN should achieve, often outside of our scope.

We are not, for example, a noise complaints body or ombudsman, although after two years we will consider if it would be appropriate to establish one in the UK. We're not a community representative body, set up to lobby on behalf of affected communities specifically – to be such would impinge on our independence.

We're also not set up to monitor noise, nor (at this point) to enforce adherence to current legal or planning conditions. And we won't be able to change things overnight, or perhaps at the pace that some would wish.



We are, however, an independent body, free to challenge everyone in a quest for better aviation noise outcomes.

We are also confident that our current remit enables us to deliver on our strategic aim and objectives to improve trust in the management of aviation noise.

Meet the Commissioners



Rob Light, Head Commissioner

Rob Light served as Deputy Chair of the Environment Agency from 2012 to 2015 and a member of its Board for six years. He was a member of the Audit Commission Board from 2011 to 2015, a Board member and Northern Chair for the Consumer Council for Water from 2015. Rob was Leader of Kirklees Council from 2006 to 2009 and was the first Chair of the Leeds City Region. He has also been Deputy Chair of the Local Government Association.

Rob says: "I am looking forward to helping to shape ICCAN as a new, independent body. I want to ensure it becomes a vibrant organisation able to drive positive change to the way aviation noise is managed. I want to see the management of aviation noise and its effects on people and communities become a key factor in the future decisions of Government, airports and airlines."



Simon Henley, MBE

Simon Henley is a Fellow and was the President of the Royal Aeronautical Society from 2018 to 2019. He served as an Aircraft Engineer Officer in the Royal Navy for 32 years, retiring in the rank of Rear Admiral. Prior to retirement, he was Technical Director and head of Programme Management for the Defence Equipment and Support organisation. Simon also served as the UK lead in the US/UK Joint Strike Fighter Programme Office, led the UK's Joint Combat Aircraft Integrated Project Team for four years, and was Programme Director at Rolls-Royce. He currently works as Business and Industry Strategy Adviser for Reaction Engines Ltd.

Simon says: "I believe that air travel has a vital role to play in the future prosperity and social needs of the UK. However, the industry can only meet global aspirations if aircraft operations minimise the noise impact on communities around airports. Communities need to be able to debate and mitigate noise issues based on factual information and common standards. I joined ICCAN to influence the debate and help ensure that the industry contributes by aggressively pursuing ways of operating which are compatible with local communities."



Colin Noble

Colin Noble is a County Councillor who lives in Lakenheath, Suffolk. He lives and represents communities next to two of Europe's largest military bases, USAF Lakenheath and Mildenhall. A former Leader of Suffolk County Council, Colin has held roles as chairman of various scrutiny committees, as well as acting as Cabinet Member for Adult Social Services, Finance and Leader of the Council. He sits on the Community Wellbeing Board of the Local Government Association and was the Health and Adult Care spokesperson for the County Council network. He is also a national Local Government Association Peer, using his experience in supporting sector-led improvement across local government.

Colin says: "My home is located by a military runway at Lakenheath, so noise has been a constant in the communities I represent and grew up in. I have experience of helping different community groups and residents to engage on difficult complex issues. I want to help share best practice and improve trust through constructive dialogue about the noise issue affecting communities."



Howard Simmons

Howard was Assistant Commissioner with the Boundary Commission between 2011 and 2018. Having been Deputy Chief Executive of a London Borough, he worked in the Audit Commission from 2008, responsible for assessing the efficiency and effectiveness of service planning and delivery across public, private and, community partnerships. Howard was also an Adviser to the Local Government Association for 12 years and formerly Chair of the Community Development Policy Group and the Four Nations Children's Play Policy Forum.

Howard says: "I live close to Heathrow airport and under a flight path, so am aware of both the economic benefits and environmental and noise impacts of aviation. I have worked extensively in building and testing partnerships and community consultation, engagement and participation methods. ICCAN has the potential by actively listening to all those involved and affected alongside assessing and identifying best practice in responding to noise issues to make a real difference."

Our two-year aim

To improve public confidence and trust in the management of aviation noise, by building our expertise, credibility and profile across the UK.



Timeline

By September 2019

Meet airport and airline representatives at the UK's top 20 airports, along with community groups, regulators and other experts

By December 2019

Scope and research a study to review operational procedures at airports

Review the Survey on Noise Attitudes (SONA)

By April 2020

Review and make recommendations to improve interaction between the airspace change decision-making process and the planning regime

Issue best practice guidance that regulators can take into account when designing the airspace change process

Publish best practice guidance detailing how airports should consult communities

Produce an opinion on consistency in the use of noise metrics

By September 2020

Develop best practice guidance on airport noise insulation schemes

Complete review of available evidence on the links between noise and health and consider making recommendations for further study

By December 2020

Develop best practice for the Civil Aviation Authority (CAA) on areas where it can apply its information powers

By April 2021

Develop and maintain best practice guidance relating to the noise impacts of the CAA's Post-Implementation Review process for airspace changes

Outline a process to agree operating restrictions for airports and relevant authorities to take into account when considering noise management issues

By ICCAN's two-year review

Review existing enforcement mechanisms and consider whether enforcement powers are necessary

Our two-year objectives and planned activity

1. Increase trust, transparency and clarity in the aviation noise debate

As stated earlier, work must be done to mend the broken trust between some airports and their communities. We will strive to improve this by recommending ways in which the industry and communities can communicate better with each other, as well as increase the transparency and reduce the complexity of the information provided. We will also seek to improve the evidence base used by decision-makers by scoping longer-term research relating to aviation noise.

When	What	Milestone for success
Year 1	Review the way in which airports consult with their communities when planning airspace changes, and offer guidance that is inclusive, effective and proportionate	Publish new best practice guidance by April 2020
	Review the Survey of Noise Attitudes (SONA) research outcomes, scope future public opinion research and make recommendations to the Government on them	Make recommendations to Government on SONA by Dec 2019
	Review and consider the different metrics used for measuring and providing guidance on the management of aviation noise, in particular between the UK's regime and the latest World Health Organisation (WHO) guidance, and consider whether there are ways to ensure better public understanding and consistency	Produce an opinion on consistency in the use of noise metrics by April 2020
	Build our relationships with communities, industry and other stakeholders by meeting with as many stakeholders as possible in our first year	Meet airport representatives, consultative committees and community groups by September 2019
Year 2	Review the available evidence on the links between noise and health, and consider making recommendations for further study	Research scoping project completed by September 2020
	Continue to consider how we can best support communities in engaging with the airspace change process	Ongoing

2. Promote consistency, responsibility and accountability within the industry and beyond

It is imperative that the aviation industry reviews its priorities and puts noise higher up the decision-making agenda, holding to account those responsible for breaches of commitment. Equally, Government and its agencies need to be more involved and co-ordinated in the decision-making processes that affect the use of airspace and the number of people affected by noise.

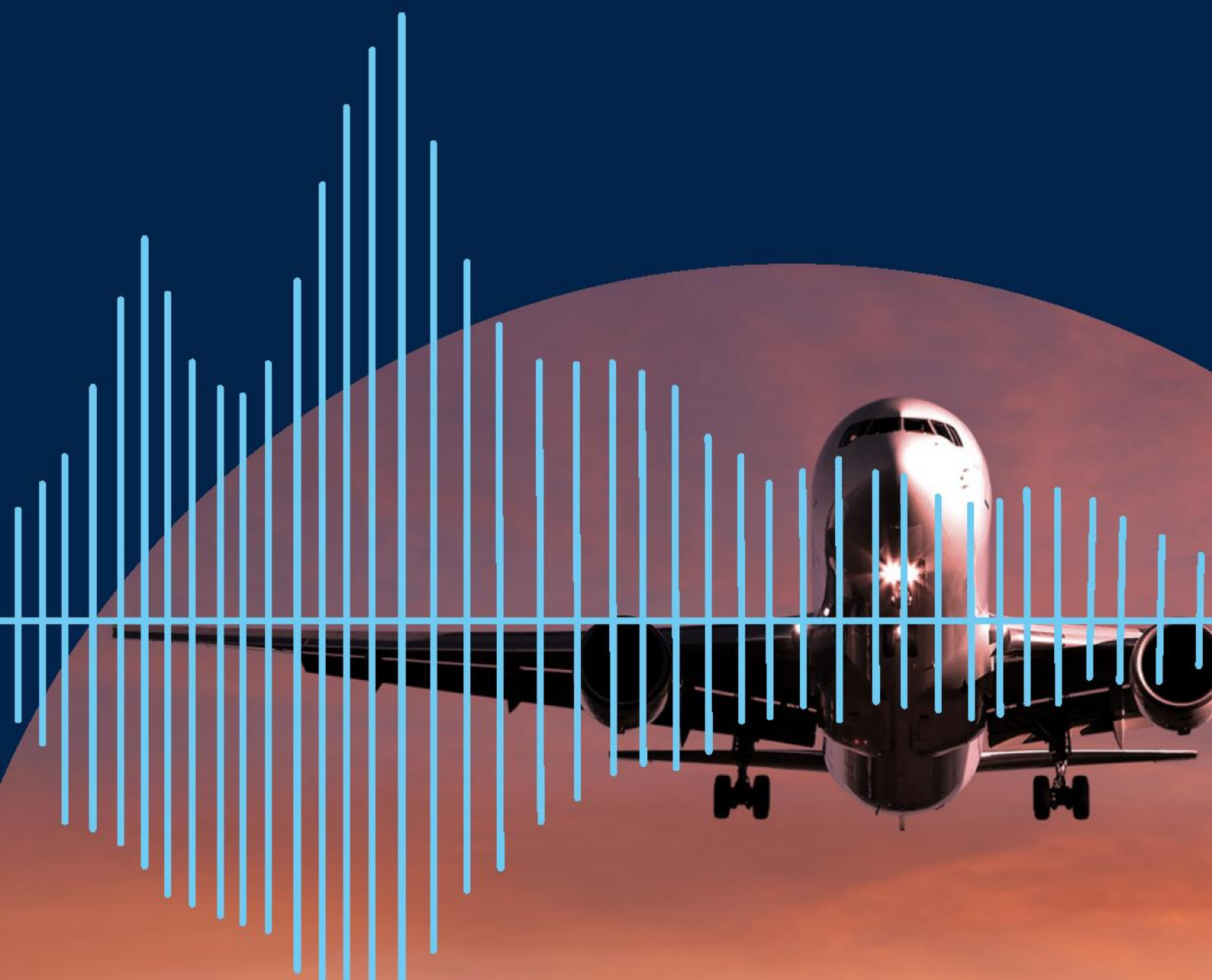
When	What	Milestone for success
Year 1	Develop and maintain best practice guidance about noise impacts for airspace change sponsors to take into account during the airspace change design process	Issue best practice guidance by April 2020
	Review the application of and adherence to defined operational procedures, such as continuous descent operations, where applicable	Scope and research a study by December 2019
	Consider interaction between the airspace change decision-making process and the planning regime, making recommendations for change if necessary	Scope, research and make recommendations by April 2020
Year 2	Review existing enforcement mechanisms and consider whether further enforcement and regulatory powers are necessary and, if so, to which body they might be given	Make recommendations to Government in time for the two-year review of ICCAN
	Review the performance and consistency of the airports' approach to noise insulation schemes, and provide guidance on best practice	Issue guidance by September 2020
	Develop and maintain best practice guidance relating to the noise impacts of the Civil Aviation Authority's Post Implementation Review process for airspace changes	Develop guidance by April 2021
	Develop and maintain best practice guidance for the process to agree operating restrictions for airports and relevant competent authorities to take into account when considering noise management issues, including consideration of the design of noise envelopes when they are being developed as a means of limiting noise associated with airport development	Develop guidance by April 2021
	Consider developing best practice for the CAA on areas where it can apply its information powers	Guidance by December 2020
	Consider our role in the monitoring and quality assurance of airport noise measurements and reporting, as well as how to enforce these	As part of two-year review

3. Establish our expertise, authority and credibility

Within our first two years, we will establish ICCAN as a source of expertise and credibility on aviation noise issues, available when called upon in statutory processes such as planning enquiries, at which we will provide authoritative information and advice.

When	What	Milestone for success
Year 1	Participate fully in the Airspace Modernisation Programme	Attend the Airspace Modernisation Board meetings
	If asked, provide expert noise advice to the Secretary of State for called-in decisions on airspace changes	Scope and research study by December 2019
	Where appropriate, provide advice to The Planning Inspectorate on airport expansion proposals	Provide expert guidance as required
Year 2	Participate fully in the Airspace Modernisation Programme	Attend the Airspace Modernisation Board meetings
	Where appropriate, provide advice to the CAA on airspace change sponsors' adherence to any guidance we issue (under the CAP1616 process) and the post-implementation review process	Provide expert guidance as required
	Advise on best practice on information provision, and could provide advice on areas where it may be beneficial for the CAA to use its information powers to improve transparency and drive improvements	Consider current CAA approach to information powers by April 2021
	If asked, provide expert noise advice to the Secretary of State for called-in decisions on airspace changes	Provide expert guidance as required
	Where appropriate, provide advice to The Planning Inspectorate on airport expansion proposals	Provide expert guidance as required

Governance and resources



Status and framework

ICCAN is a non-statutory advisory arm's length body, set up and sponsored by the Department for Transport (DfT). The Commission is establishing a framework agreement with DfT, which sets out the governance framework under which it will work. This is expected to be published shortly.

We will be permanently based in Woking and supported by a small team, led by the Secretary to the Commission. When fully staffed we will have 14 members of the secretariat, split between analytical, policy, communications and business support roles.

Budget

We are funded by the DfT, with a budget of £1,588,000 for year one (2019/20).

As part of confirming our corporate strategy, we will be identifying how we wish to allocate our resources across staffing and business costs, communications and engagement, and commissioning of expert advice and external research.



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