

Dr John Godfrey DL  
Chairman

County Hall  
Chichester  
West Sussex  
PO19 1RQ



Telephone 033022 22543  
Website: [www.gatcom.org.uk](http://www.gatcom.org.uk)

---

If calling ask for  
Mrs. Paula Street  
e-mail: [paula.street@gatcom.org.uk](mailto:paula.street@gatcom.org.uk)

24 July 2015

Dear Mr McLoughlin,

### **Airports Commission: Final Report**

I write to bring to your attention to the comments of GATCOM in respect of the recommendations contained in the Airports Commission's Final Report as well as the Commission's recommendations set out in its Interim Report.

GATCOM considered the Commission's Final Report at its meeting on 16 July and has raised a number of points that we urge the Government to consider as part of its assessment of the Commission's recommendations. The Committee's comments are as follows:

#### **Proposed ban on night flights at Heathrow**

GATCOM is pleased to note that the Commission has highlighted a number of measures to address the concerns of communities around Heathrow about the impact of noise and disturbance caused by aircraft overflight. However the proposed ban on all scheduled night flights at Heathrow following the opening of a third runway will undoubtedly have implications for the London airports system as a whole and our members are particularly concerned to ensure that such a ban will not have a negative impact on the communities around Gatwick and the other London airports. GATCOM therefore urges the Government to carefully consider the impact of such a ban on the system as a whole.

#### **Proposed noise levy**

GATCOM is interested in the Commission's recommendation to introduce a new noise charge or levy at major UK airports to ensure that airport users pay more to compensate local communities, following the examples of dedicated taxes or charges in France and the USA. It is noted that the suggestion is that the proposed Independent Aviation Noise Authority could advise on the design of the charge but that it should be for the Government to determine the scale and structure of the noise levy in line with the principles that the Commission has outlined in its Report. Whilst GATCOM supports the principle of raising funds for mitigation and compensation schemes, there is a need to clarify whether this levy is instead of rather than in addition to the current differential charging structure at airports. It is vital that the proposed levy should not impose undue or unfair costs at any airport or on any airline and is not in addition to those differential charges imposed as part of the current airport landing fees

#### **BY EMAIL**

Rt Hon. Patrick McLoughlin MP,  
Secretary of State for Transport  
Great Minster House,  
76 Marsham Street  
LONDON  
SW1P 4DR

framework. It is also important that such a levy does not penalise those airlines that invest significantly on new quieter and cleaner aircraft fleets.

This is an important issue for airports, airlines, passengers and communities. GATCOM would therefore welcome the opportunity to contribute to the Government's consideration of this proposal at an early stage in the process, including any consideration by the Independent Aviation Noise Authority should one be established.

GATCOM also seeks clarification as to whether there would be an expectation that Community Engagement Boards be established at other airports where a noise levy is imposed. If this is the case then careful thought will need to be given to how role of the Community Engagement Board fits in with the work of airport consultative communities.

### **Independent Aviation Noise Authority**

GATCOM has previously considered the Commission's suggestion of establishing an Independent Aviation Noise Authority (IANA) when it considered the Commission's Interim Report.

GATCOM acknowledges there is a mix of opinion on the idea of establishing a new independent body, its value and how it is appointed and funded. The merits of an IANA in terms of the provision of specific advice to the Government and the CAA on overarching aviation policy, modelling, the commissioning of research and examining key issues on a pan-airport scale are recognised. The detailed functions and powers of the new body must however be appropriate, proportionate and enforceable and its potential involvement in mediating on local noise issues clearly defined.

GATCOM has specific comments and concerns as follows:

### **Role and Functions**

- There is a need to avoid duplication of the role and work of both the Government (DfT/Defra) and the CAA, particularly in view of the CAA's recently expanded powers.
- a one size fits all approach in considering local noise impact issues is not appropriate and is best dealt with locally to seek resolution or mitigation. Airport Consultative Committees have an important role in helping to ensure that airports/the industry continue to strive to reduce and mitigate their impact on local communities and that local issues are addressed and where possible resolved or mitigated locally. Careful thought will therefore need to be given to how the roles of the Community Engagement Board and that of IANA fit in with the work of airport consultative committees.
- it must be recognised that it is often adherence to Government policy that is the root cause of many local noise issues. IANA could have a role in helping to identify ways in which national policy and operational guidance can be improved/revised to address major issues of noise disturbance at the national level.
- a fundamental aim of a new body should be to establish trust and confidence between parties, thus bringing about a fair and reasonable balance between increasing demand for flights and noise control. The terms of reference and constitution will therefore be an important consideration in any new body gaining trust.
- if the new body is to provide advice and recommendations to the Government or the CAA such advice must be seriously considered, and if not accepted robust reasoning given. This is considered crucial as if its advice or recommendations were subsequently not accepted, this could result in increased mistrust amongst communities.

GATCOM trusts these comments can be taken into consideration in your deliberations on the Airports Commission's recommendations. If the Government is minded to take forward the proposed IANA, GATCOM would like to register its desire to be fully involved in the development of the functions and powers of the new body at an early stage in the process.

### **Surface Access Improvements**

In its Interim Report, the Commission outlined a package of measures to improve surface access to airports in the short to medium term. There were a number of measures proposed for the rail and road networks around Gatwick. GATCOM is therefore seeking reassurance from the

Government that the previous recommendations of the Commission will continue to be taken forward and that the funding streams already identified will be maintained, particularly in respect of the redevelopment of Gatwick Station and the improvement to the A27 in East Sussex which is related to growth at Gatwick.

### **Implications of new runway capacity at Heathrow**

In its responses to the Airports Commission's consultations, GATCOM has consistently stated that there was a need for the Commission to consider the long term implications for Gatwick should it be decided that that expansion should take place elsewhere. It appears that the Commission has not yet assessed the long term impacts (economic/social/competition/environment) of new runway at Heathrow elsewhere across the London airports system. It is vitally important for the airport and communities around Gatwick to have an understanding of the impacts and what measures can be put in place to help ensure that the new runway at Heathrow will not have a detrimental effect on the current airport operation and on the region's economy and environment. GATCOM therefore urges the Government to ensure that this work is first carried out before decisions are taken on the Commission's recommendations.

### **The next steps**

GATCOM has acknowledged that the way in which this review of the UK's airport capacity has been conducted has been significantly different to that which has been undertaken previously. The process has been undertaken in a competitive environment which the Committee believes has led to much local campaigning activity throughout the bidding process creating much uncertainty and anxiety for local communities. GATCOM therefore hopes that the Government can now take time to reflect on the outcome of the process to date and conduct the debate in a more rational manner.

GATCOM trusts its comments will be taken into account.

Yours sincerely,



Dr John Godfrey DL  
Chairman