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12 October 2017

Dear Mr Grayling,

**Aviation Strategy "Beyond the horizon: The Future of Aviation" – Call for Evidence**

I write in response to your Call for Evidence to help shape a new Aviation Strategy for the UK. GATCOM has considered the strategy aims and objectives set out in the Call for Evidence document and its comments in respect of some of the questions posed in the document are appended to this letter.

GATCOM, the Gatwick Airport Consultative Committee, is the statutory advisory body for Gatwick Airport and comprises representatives from local authorities, the aviation industry, passengers, business, tourism, environmental interests and other users of the airport. We provide a forum for informed discussion leading to the provision of advice to the Government, Gatwick Airport Ltd and other organisations on a range of matters concerning the operation and future development of Gatwick. Given the broad range of interests represented on GATCOM, it is not possible for the Committee to comment on all the questions posed in your Call for Evidence because there is a diverse mix of views. The Committee has however reached a consensus on a number of points as set out in the attachment.

I trust GATCOM's comments can be taken into account.

Yours sincerely,

A handwritten signature in blue ink that reads "Paula Street".

Paula Street  
Assistant Secretary

**BY EMAIL**

Rt Hon. Chris Grayling MP  
Secretary of State for Transport  
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# **GATCOM RESPONSE TO THE CALL FOR EVIDENCE ON A NEW AVIATION STRATEGY**

## **Questions on the Aviation Strategy's aim and objectives**

**4 In what order of importance should the policy challenges listed below be tackled?**

**Please tell us why you have suggested this order of importance.**

- **keeping pace with consumer expectations**
- **maintaining high levels of safety and security**
- **expanding our access to markets and trade**
- **encouraging competitiveness**
- **meeting increasing demand through sustainable growth**
- **keeping pace with technology and developing skills for the future**

## **Comments**

GATCOM is in principle supportive of the proposed approach to the development of a new aviation strategy and recognises that as an island nation, UK airports have a critical role to play in the transport of people and goods. GATCOM also recognises the importance of connectivity and aviation's key role in helping the UK economy to grow on a sustainable basis. Aviation is one of the UK's success stories with UK being seen as a key destination for existing and new airlines. However ways in which the environmental impacts can be managed and mitigated as the industry grows must also be a key priority for the Government and the industry working with local communities affected by an airport's operation. Given that the new strategy is to provide a framework for the industry to 2050 and beyond it is hoped that the strategy will also provide greater incentives and controls to manage the negative impacts of the industry.

As GATCOM's membership comprises a wide range of interests including airlines, passengers, businesses, local authority, environmental and amenities groups, tourism and airport staff, the Committee is not in a position to state an order of importance for the strategy aims and objectives given the diverse mix of, and in some cases conflicting, views of its members.

The Committee has however reached a consensus on a number of points. GATCOM's unanimous view is that all aspects of safety and security, both in the air and on the ground, is of paramount importance and that growth in the UK aviation sector is necessary to improve the country's global connectivity and competitiveness so as to support economic growth well into the future. GATCOM believes that connectivity, both internationally and within the domestic market, is vital as the UK transitions to a new relationship with the European Union. The increase in demand arising from greater connectivity and economic growth must however be balanced against the negative impacts of aviation, particularly in respect of aircraft noise and overflight, air pollution and other associated impacts on communities as described by the ICAO balanced approach. Addressing the environmental impacts of aviation must therefore be of equal priority to meeting increased demand.

## **5 Aim and objectives**

**Aim: To achieve a safe, secure and sustainable aviation sector that meets the needs of consumers and of a global, outward facing Britain**

**The strategy will have the following six objectives:**

- **help the aviation industry work for its customers**
- **ensure a safe and secure way to travel**
- **build a global and connected Britain**
- **encourage competitive markets**
- **support growth while tackling environmental impacts**
- **develop innovation, technology and skills**

**What are your views on the proposed aim and objectives?**

GATCOM supports the overall aim of the strategy and its comments on the individual objectives, in no order of importance, are as follows:

**Help the aviation industry work for its customers** – it is important that the Government sets a clear policy framework which focuses on the end-to-end journey experience from home to flight, the efficiency of use of airspace and from flight arrival to destination in the UK. Delivering an efficient and high quality journey experience is a complex matter involving many organisations and agencies. It is essential that the new policy framework seeks an improved joined up and collaborative approach across the different organisations/agencies and Government departments (such as DfT, Home Office, Defra, DCLG and Treasury) to ensure that investment, infrastructure, resource and facilities are forthcoming and put in place to achieve the objective. It is essential that the CAA, NATS, Border Force, security services, Network Rail, transport providers, airlines and their handling agents and airport operators work collaboratively to fulfil this objective.

Providing efficient and reliable surface access to airports is an important element in helping the industry to work for its customers and users (passengers, freight operators, airport/airline staff, businesses and other users). This is also vital in supporting growth in the industry while tackling environmental impacts through encouraging greater use of public transport to access airports which helps to reduce local traffic congestion and associated air pollution. However experience at Gatwick is that whilst there has been some investment in surface access schemes there has also been many obstacles preventing that investment from being truly realised. Paragraph 7.8 of the call for evidence document states “although Government does not invest in airport infrastructure it does however have a significant role to play in providing transport access ensuring that airports are connected to the existing national road and rail networks and that those networks have sufficient capacity to handle traffic moving through those gateways”. It also states that the Government’s existing road and rail investment strategies explicitly consider the links to airports and cites the £6bn Thameslink programme providing benefits to Gatwick.

Whilst GATCOM welcomed this investment is it most concerned that the airport is now suffering the consequences of the poor performance experienced on the Southern network in that the outcome of the Chris Gibb review of the Southern franchise recommended a number of actions that have a detrimental impact on services to and from Gatwick airport, particularly in the night period. This means the opportunities first presented by the Thameslink programme are not now being fully realised. There are also capacity constraints on the Brighton Main Line identified by Network Rail that need to compete nationally for funding. GATCOM raised its concerns with the Secretary of State for Transport but the Minister for Rail’s response dated 1 September 2017 does not align with the Government’s statement set out in paras 7.8. and 7.9 of the call for evidence document. This clearly demonstrates the need for a more joined-up approach across Government departments.

The new aviation strategy must therefore address the issue of transport infrastructure funding provision to accommodate growth at airports. It is essential that investment is guaranteed for rail and road major schemes, as well as enhanced local highways maintenance funding to address the increased use of the local highway network around airports, at the right time and before airport expansion is delivered.

**Ensure a safe and secure way to travel** – GATCOM supports the approach set out in the call for evidence document.

**Build a global and connected Britain** - GATCOM believes that connectivity, both internationally and within the domestic market, is vital as the UK transitions to a new relationship with the European Union. The increase in demand arising from greater connectivity and economic growth must however be balanced against the negative impacts of aviation. Again, the importance of efficient and reliable surface access to airports is a key part of this objective and requires a joined up approach to investment in and the provision of surface transport infrastructure.

**Encourage competitive markets** – GATCOM recognises that competition is important and can help to provide higher quality and a more efficient environment for passengers, users and the industry. It is essential however that there is a level playing field within which UK airports operate both internationally and within the UK. GATCOM is aware of the various views about the future of APD and the implications of the transfer of APD powers to the Scottish Government from 1 April 2018. There is concern that APD may have a greater negative impact on the UK's global connectivity and competitiveness which could damage UK business and tourism. GATCOM is also concerned to ensure that mechanisms are put in place to prevent market dominance within the UK airports market.

**Support growth while tackling environmental impacts** – Aviation has a key role in helping the UK economy to grow but this must be on a sustainable basis. The environmental impacts such as noise mitigation for both aircraft noise and airport ground noise, some form of respite from aircraft overflight, and the control of air pollution must be addressed and managed in consultation with interested parties and local communities. As the incremental growth of airports falls outside of the scope of the planning process, GATCOM agrees that airport master plans and airport surface access strategies are important as they set out the way in which an airport expects to grow and expand and how the impacts, both positive and negative, can be managed and addressed.

As is the case at Gatwick, the airport's development strategy as set out in its airport master plan is backed by a legal agreement between the airport operator and the local planning authority, Crawley Borough Council, and West Sussex County Council which places legal obligations on the airport to manage airport growth and mitigate the impacts. The agreement also establishes a memorandum of understanding with all the borough, district and county councils around the airport to ensure a collaborative approach to managing airport growth. GATCOM advocates this approach which should be embraced by the Government in its review of the aviation policy framework.

Planning for economic growth and land use around airports is an essential element of the new strategy in helping to manage the environmental impact. An area that must be examined as part of aviation policy review process is the problems local planning authorities and developers face since the ending of PPG 24 (Planning Policy Guidance for development in noise sensitive areas) and the absence of appropriate metrics in the replacement National Planning Policy framework, particularly the Noise Policy Statement for England issued in 2010 which lacks true guidance and parameters. As previously stated by GATCOM this is an area that the Government must address and provide detailed guidance.

The Government's review of the UK Airspace Policy is supported and it is hoped that the new policy can be announced as soon as possible. It is acknowledged that modernising the UK's airspace is essential to ensure greater operational efficiency and that best use is made of the available airspace capacity. It is noted that the Government will explore whether a new approach to reducing noise annoyance is needed. GATCOM fully agrees that the current mechanisms for finding local solutions when dealing with aviation related noise and the ICAO balanced approach remains appropriate for the future. However, as stated in GATCOM's response to the UK Airspace Policy consultation, the Committee has concern over the proposals for ongoing noise management and the suggestion of transferring more powers to the airport operator and local authorities. GATCOM does not agree that many of the matters claimed to be within the planning regime actually lie there and that many areas overflown are outside the administrative boundary of the local planning authority. The examples cited by GATCOM previously are that the night flight restrictions or other operational restrictions, such as the departure noise limits, could not reasonably be handled as an on-going process into an unforeseeable future, through the planning process. GATCOM is keen to understand how the Government's proposed arrangements would comply with the legal framework for the ICAO Balanced Approach.

How sustainable growth can be defined in terms of noise is a complex and sensitive matter to be addressed. Finding local solutions to local problems as currently happens is advocated by GATCOM and but there is a need for all key stakeholders and local community groups to work

together, have mutual respect and collectively agree solutions. At Gatwick, work continues on ways to improve and mitigate the noise climate which includes developing a definition for fair and equitable distribution of use of arrivals and departures flight paths and airspace around the airport with local community groups. It is hoped that the outcome of this work can be fed into the Government's policy review. There is a need however for guidance to be given on developing a metric which can be used to benchmark the impact of an airport's growth on noise disturbance and aircraft overflight frequency so as to ensure that as traffic at the airport grows the noise climate around the airport, both close in and further afield, does not deteriorate.

GATCOM also welcomes the Government's intention to look at new forms of compensation and community investment. As GATCOM raised in its response to the UK Airspace Policy consultation, there is a need for the Government to put in place mechanisms to ensure that where flight paths are changed resulting in homes and noise sensitive businesses being overflown for the first time, or where overflight is significantly increased, that financial compensation towards the loss of property value is awarded. The Government's response to that consultation is awaited with interest as there is a need to provide more clarity on this important matter.

Providing respite could be very valuable for some communities affected by noise provided that it does not involve diverting flight paths over areas which are at present peaceful, or if consultation shows that the proposed scheme (eg twice as many planes on alternate days) would cause less annoyance. However, it should be balanced with the effects on carbon emissions, frequency of flights and thus disturbance. There is a need for more evidence about the benefits, as well as the disbenefits, of the various forms/concepts of respite so that the industry and local communities can consider all the options available to reduce and mitigate the aircraft noise and overflight impacts. It must be recognised however that the implementation of respite schemes could mean negative impacts for some people and in such cases mitigation, amelioration and compensation schemes may be needed.

GATCOM also believes that the current noise preferential routes (NPRs) should remain so as to give certainty to planners and local residents as to where departing aircraft at lower levels should be flying over areas closest to the airport and give an indication as to where the greatest impact in terms of noise disturbance can be expected.

In terms of air pollution, over the past 10 years nitrogen dioxide pollution around Gatwick has improved considerably but with the greatest improvement attributable to changes in non-airport sources. The Government will therefore need to take a more proactive role in tackling air pollution from aviation if it wishes to see further growth in this sector without a potential deterioration in air quality going forward. In addition to this, whilst it is accepted that ultrafine particulate (UFP) pollution research is still in its early stages and the international debate on whether to regulate these pollutants continues, as the new strategy is looking to 2050 and beyond there is a need for the Government to consider ways in which it can work towards greater monitoring and reporting on UFP pollution.

**Develop innovation, technology and skills** – GATCOM is generally supportive of the approach set out in the call for evidence document.

However, the Committee would like to take the opportunity to again comment on the introduction of new navigation technology. Whilst the current problems following the introduction of P-RNAV on Gatwick's departure routes are recognised and remain a concern to GATCOM, it is also recognised that P-RNAV gives a great opportunity to fly more accurately, discover which is the most appropriate line, or use of lines on a rotation, to fly within the NPR or arrivals route. P-RNAV also provides the opportunity to discover possibly better paths to fly within the NPR, but affects less people. This information could be really useful when LAMP is introduced in 2020. It is highly likely that one size will not fit all when deciding the path to fly so respite needs to be investigated whether for departing or arriving aircraft. It should be possible to share the annoyance rather than concentrating on a specific population if an acceptable single route is unacceptable. It is hoped that the new aviation strategy advocates the exploration of other ways to best utilise this new technology.

## Questions on the policy making process

### 6 The strategy's policy principles are:

#### Strategy principles

- consumer focused – it will put passengers and businesses at the centre of everything we do
- market driven – it will emphasise the role of government as an enabler, helping to make the market work effectively
- evidence led – it will target intervention on specific problems which government can address, avoiding activity that does not respond to a clear problem

### What are your views on the proposed principles?

GATCOM generally agrees with the strategy principles but would reiterate that addressing the environmental impact and the impact on local communities both close to the airport and those further afield under flight paths is an important key objective. As such these should be reflected in the strategy principles too.

It is hoped that at a future stage of consultation the Government will give an overview of the specific ways in which it proposes to action the strategy objectives.

### 7 The policy tests for the development of the strategy are:

#### Policy tests

- **What is the rationale for action?** This will remain focused on what the government is trying to achieve, not just in terms of outputs (such as the publication of an Aviation Strategy), but the final outcome for the sector and society.
- **What is government's role?** This will look at the need for government action to fix an identified problem, or whether activity is better carried out by others.
- **What does the evidence say?** This is a test of whether the government is using the best available evidence and whether there is anything that could be done to improve the information and data available to decision makers.
- **Have all of the options been considered?** This will ask whether there are other approaches that may not have previously been considered.
- **What is the effectiveness of any proposed action?** This will ask whether Government has considered the practicalities of policy decisions and if these have been properly discussed with those affected or who have an interest.

### What are your views on the proposed policy tests?

GATCOM agrees with the proposed policy tests provided the Committee's comments on the strategy objectives and principles are taken into account.

## Specific question on utilising existing runways

### 10 What are your views on the government's proposal to support airports throughout the UK making the best use of their existing runways, subject to environmental issues being addressed?

GATCOM recognises the important role of Gatwick Airport in maintaining a vibrant and growing economy for the Gatwick region and that it is one of the region's major economic generators. This is a position that needs to be protected and supported. The principle of making best use of existing runway capacity has been supported by GATCOM over the years.

GATCOM fully acknowledges that the real issue in considering a long term strategy for aviation is to strike a balance between the economic benefits of meeting demand and the needs of the

industry with the impact this has on local communities and the environment. It is essential that airports work in harmony with the local communities around them. Gatwick is the busiest single commercial runway in the world and is fully utilising its single runway with little capacity to grow in terms of traffic movements. This means the flight paths into and out of Gatwick are intensively used which has a negative impact on local communities close to the airport and further afield under the arrivals flight paths and ways to mitigate that impact are very limited. Also, the economic benefits and related growth in the Gatwick region arising from making best use of available capacity will also require further investment in the region's rail and strategic and local road network by the Government and transport providers. Given the fact that the new aviation policy is to set out a long term vision to 2050 and beyond, the Government will need to address the sensitive matter of how future growth at capacity constrained airports can be accommodated, addressed and mitigated.

### **Questions on the consultation process**

The proposed timetable set out in chapter 2 is ambitious given the number of further consultations on the specific themes that are planned as part of the process. It is questioned whether this will create consultation fatigue or overload and there may be some organisations and other respondents who may not have the resource available to prepare the evidence needed to make a robust submission as part of the consultation process.

Given the wide impacts of an airport's operation, both positive and negative, it is essential that the Government's consultations reach the widest possible audience across the industry, businesses, local communities, environmental groups and transport providers. Airport consultative committees can assist in helping to disseminate information to interested parties and communities around their airports to raise awareness of the need for people to make their views known to the Government direct. It is therefore important to engage airport consultative committees in the process as well as seeking their views. GATCOM welcomes the opportunity to fully participate in review process.

### **Other comments**

**18 Do you have any other comments on the issues raised by this call for evidence? If so, you can either give these in your response to this consultation, or in the themed consultations which we have planned for each of the objectives.**

No further comments.