

Tony Kershaw
Honorary Secretary

County Hall
Chichester
West Sussex
PO19 1RQ



Gatwick Airport Consultative Committee

Telephone 033022 22543
Website: www.gatcom.org.uk

If calling ask for
Mrs. Paula Street
e-mail: secretary@gatcom.org.uk

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Dear Lee,

FINAL DRAFT: GATWICK END NOISE ACTION PLAN 2019 - 2024

Firstly, thank you for giving GATCOM a further opportunity to review the Final Draft of the END Noise Action Plan (NAP). The Committee is pleased to note that many changes have been made to the Final Draft NAP including further refinement to a number of the actions reflecting the feedback GAL has received from its consultation with GATCOM and other key interested parties.

As part of its consideration of the Final Draft END NAP, GATCOM has again been informed of the on-going concerns of some community noise groups represented on Gatwick's Noise Management Board and that their view is that the reviewed plan does not adhere to Defra's guidance and is not fit for purpose. GATCOM does not share this view and overall the Committee believes the Final Draft END NAP provides a comprehensive plan setting out the overarching approach to noise management at Gatwick and the KPIs to be met on a variety of performance standards.

GATCOM is also pleased that GAL has added new actions in response to feedback received and has particularly welcomed the expanded scope of Action 39a relating to the identification of new noise metrics and reporting. GAL's work on developing new noise metrics is viewed as a high priority by GATCOM given the importance of establishing measures to track more meaningfully airport growth against the impact this has on the noise climate around Gatwick.

GATCOM supports the "living document" approach which echoes the Government's previous advice to airport consultative committees on the purpose of the END NAP and is pleased that it is GAL's intention to use the outcomes from its metrics work to assist in describing more precisely the aims, targets and outcomes of the actions within the END NAP.

However, an area on which GATCOM has not been able to reach agreement with GAL is on the need for the statutory END NAP to set an overarching target against which the airport's overall performance in maintaining, and where possible, achieving a reduction in the noise climate can be monitored and measured. GATCOM believes that in order to give greater confidence to local communities impacted by aircraft overflight and noise that GAL is serious about containing the noise environment as traffic at the airport grows, the setting of an overarching target in the statutory END NAP is something that GAL should embrace.

cont'd...

VIA EMAIL

Lee Howes
Airspace & Environmental Performance Manager
Corporate Affairs, Planning & Sustainability
Gatwick Airport Ltd

GATCOM acknowledges that the use of the term "aim" is used widely throughout the NAP and whilst it is noted that this term is consistent with both the Environmental Noise (England) Regulations 2006 and Defra's Guidance (which only stipulate the need for new noise abatement objectives with the aim of providing further management of the noise impact), does not easily lend itself to be monitored and measured in the same way as a target.

As "critical friend" to the airport, GATCOM therefore recommends that GAL reviews whether an overarching target can be included in the END NAP which would also align with the aim set out in Action 39(a) in the development of new noise metrics and which can then be informally reviewed through the "living document" approach. Should GAL agree to such an approach GATCOM would expect to be consulted on any such informal review alongside community noise groups.

Finally, GATCOM also has concerns about how the Government intends to monitor the success of the END NAP to ensure that the airport is delivering the Government's noise management policies and objectives. This is a matter that the Committee will pursue with the DfT and Defra direct.

I trust our comments can be taken into account in the Final END NAP submission to Defra.

Yours sincerely,

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

Assistant Secretary