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Gatwick Airport Consultative Committee

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27 April 2018

Dear Lee,

GATWICK END NOISE ACTION PLAN 2019 - 2024

GATCOM welcomes the opportunity to help shape the reviewed draft END NAP and is confident that at the end of the consultation process involving GATCOM, the NMB community noise groups and Gatwick Local Authorities that GAL will have one of the most comprehensive and effective END NAPs in the country.

The END NAP is viewed as the overarching, statutory key driver for the airport to manage and mitigate the impact of aircraft noise around Gatwick bringing together the work of the various noise management groups and noise mitigation initiatives. It is important therefore that the NAP is seen as a “living document” and offers scope for regular review to reflect changing local circumstances. Having an effective and transparent monitoring and audit regime which helps ensure GAL remains on track to fulfil the various actions and commitments also needs to include a process to put in place remedial action when necessary, will give confidence to local communities impacted by aircraft overflight and noise that GAL is doing all that it can to mitigate the impacts and where possible seek an improvement in the noise climate.

Overall, GATCOM believes the draft reviewed END NAP gives a comprehensive account of the way in which GAL manages the noise climate, the legislative and regulatory framework within which GAL is required to operate, the proposed actions to be undertaken over the next five years and the schedule of consultation responses received. Many of the actions proposed in the draft NAP are supported and the revised format which introduces new additional columns against each action to address the requirements of DEFRA’s guidance is welcomed. The inclusion of information on the estimated area/number of people to benefit from the action, the expected benefit and cost of the action and the other organisations to be involved in fulfilling the action will assist in the monitoring process.

GATCOM particularly supports GAL’s work, being pursued through the NMB, to identify noise metrics and reporting to track traffic growth and the noise impact on local communities. It is noted that GATCOM previously suggested new actions 31a and 39a to capture the development of noise metrics and N60 contours for the night period, to be progressed as a priority in the early part of the plan period, have now been addressed through the bringing together of these actions into a standalone action – Action 39a - within the “monitoring and reporting our progress” section of the NAP.

VIA EMAIL

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

However, GATCOM remains concerned about the lack of clear indicators or targets in the draft document. Some of the 'expected outcomes' from the additional KPIs set out in the draft document are already being achieved and as a result will just maintain the positive steps already being taken. The removal of all Chapter 3 aircraft is welcome as is the move to 80% Chapter 14 aircraft. However the final outcome concerning the 48dB 6.5hr night contour being within 47km² is confusing as in annex 6 (p.106) of the Action Plan there is reference to the Local Authority Planning Conditions, where it states:

"Limit the 6.5 hour, 48 dB(A) Leq contour (for the winter and summer seasons combined) to 47km² by 2011/2012. At Gatwick in 2011/2012 the 6.5 hour 48dB(A) Leq contour (for the winter and summer seasons combined) was 34.1 km². In 2002-2003 it was 41.3 km²."

In addition the table in Figure 24 (p.106) shows that in Summer 2015 and Winter 2016 the combined 48dB Leq, 6.5hr contour area was 35.2 km². As night noise is one of the major sources of annoyance for local communities GATCOM believes that GAL should be aiming to ensure this contour area remains the same at the very minimum as traffic grows and preferably be reduced over the next 5 years.

There is an overall lack of general overarching targets which is surprising given that some of the KPIs could be measured as there is existing data. However GAL needs to give a clearer commitment to actually measure any improvements and compare them to previous reports. For example, Action 10: Ground Noise - the indicator is unclear and "aim" is to maintain effective ground noise operational controls. The lack of clear indicators or targets could create difficulties for the auditors of the Noise Action Plan as there are no targets to be able to audit against. This will ultimately result in auditors confirming an action has been done but being unclear on any potential benefit. As it is important that the NAP outcomes are tangible and are able to be effectively assessed, GATCOM recommends that GAL reviews its "Aims" to make them "Targets" and introduces a few overarching targets which will help drive the behaviour to achieve those targets.

As regards the identification of actions to be progressed as a priority in the early part of the plan period, it is noted that GAL is open to discussion with GATCOM which actions are considered priorities for implementation and that this will form part of a subsequent discussion once the END NAP has been agreed by DEFRA. GATCOM wishes to pursue this point and whilst not wishing to circumvent the clear NMB role in helping to agree noise mitigation priorities as part of its work plan which is also captured by the NAP, it is felt that identifying some priorities in the NAP will help to build confidence and trust amongst communities that initiatives of importance are being treated as a priority by GAL. As a reminder GATCOM has suggested Actions 9, 25, 39 and 39a. Should this point not be accepted in the final version of the END NAP then GATCOM welcomes the opportunity for further discussions at the earliest possible time following Defra's approval of the plan.

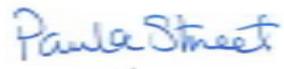
As regards Action 9: Implementation of a voluntary ban on operations of QC4 aircraft within the core night period, and Action 25: Review of Departure Noise Limits, GAL's response to GATCOM's previous comments is noted. However, the Committee believes the GAL should do more to pursue these actions and believes that GAL should seek confirmation from the Secretary of State for Transport whether they can set their own limits over and above those by the Secretary of State. In respect of night flights generally, GATCOM would remind GAL that the Government's decision on the current night flights regime offered scope for airports to explore bespoke, airport-specific arrangements during the five year night flight regime should they wish to do so. GATCOM hopes therefore that this opportunity be further explored through the work of the NMB.

Finally, GATCOM has considered GAL's response to the Committee's comments on the specific actions. Set out in the table attached to this letter is GATCOM's response to how GAL has taken on board its comments. In some cases GATCOM has asked that GAL

gives further consideration to the proposed action as part of this response to the consultation on the draft plan.

I trust GATCOM's comments set out in this letter and in the attached table can be taken into account in the final draft version of the plan.

Yours sincerely,

A handwritten signature in blue ink that reads "Paula Street". The signature is written in a cursive, slightly slanted style.

Assistant Secretary

GATCOM'S RESPONSE IN RESPECT OF SPECIFIC ACTIONS

	Action	GATCOM Comment	GAL Response	GATCOM Response to GAL's response
1.	We will maintain a charging differential in our published airport charges which incentivises the use of aircraft with the best in class noise performance.	<i>Publishing the track fleet mix would allow year on year comparison. Could use on index which uses the QC system to calculate average for summer/winter.</i>	Included under Performance Indicator and Reporting: Indicator: Fleet mix including % of Chapters 4 and 14 Aircraft. Reported: Quarterly to NaTMAG. Included under 'AIM': By 2024, 90% of movements are by Chapter 14 aircraft.	Accept
3.	We will review the landing fee differential at least every five years.	<i>Or in response to a change of circumstances (i.e. FOPP)</i>	No amendment made to action.	Recommends that the wording of the action be amended to include reference to our previous comments. It is important to ensure that the NAP remains a "living" document and is adaptable to changing circumstances
8.	We will, as far as is practicable, take all necessary steps to manage the late running of aircraft to prevent scheduled day movements taking place during the sensitive night period.	<i>Yes but also suggest include reference to reporting to FLOPSC</i>	Indicator amended to read: Indicator: The number of off-schedule flights which are delayed into the night period. Reported: Airside operations and airlines.	Accept
9.	We will implement a voluntary ban on operations of Quota Count 4 aircraft within the core night period	<i>This should be brought forward to 2019. Alternatively introduce a charging differential (like FOPP) where there</i>	Action changed: We will implement a voluntary ban on operations of Quota Count 4 aircraft within the core night period by the end of	Accept. GATCOM recommends that this Action be identified as a priority early in

	by the end of 2024.	<i>is a significantly increased charge from 2019 on QC4s at night.</i>	2022.	the Plan period - see also comments in covering letter
24.	We will continue to fine aircraft in breach of the Department for Transport departure noise limits with all such monies passed to the Gatwick Airport Community Trust	<i>With modern aircraft there is no excuse exceeding the departure limits. A review of the fines should be carried out and they should be set at a level that would far exceed any benefit that maybe gained from exceeding the noise limits.</i>	No amendment made to Action.	See comments under Action 25
25.	We will engage with the Department for Transport and the Aircraft Noise Management Advisory Committee to review departure noise limits at Gatwick Airport.	<i>GAL could introduce its own lower limits if the DfT will not support a change. Also suggest that the target date is brought forward to 2020.</i>	No amendment made to Action.	Recommend that GAL seeks confirmation from the Secretary of State for Transport whether they can set their own limits over and above those by the Secretary of State. See also the comments in the covering letter. GATCOM also recommends that this action is treated as a priority by GAL.
29.	We will continue to offer acoustic insulation to noise sensitive buildings within the 63LAeq,16hr Summer noise contour.	<i>2014 scheme expanded to include the 60dB LAeq16hr.</i>	Action amended to read: We will continue to offer acoustic insulation to noise sensitive buildings within the 60LAeq noise contour.	Accept
30.	To address the impacts of future growth we will continue to offer to purchase those properties suffering from both a high level of noise (63dB	<i>There are no proposed changes to NPRs with LAMP2, however if there is no other option available and a new NPR is introduced and new people are</i>	No amendment made to Action.	Noted. Given the concerns subsequently expressed by a community group about the potential blight arising from changes to

	L _{Aeq} ,16hr or more) and a large increase in noise (3dB L _{Aeq} or more), in accordance with the Terms of Reference of the Property Market Support Bond and Home Owners Support Scheme.	<i>overflowed then a lower figure should be considered.</i>		airspace, GATCOM no longer wishes to pursue its previous comments.
31.	In conjunction with the Noise Management Board we will explore innovative methods to reduce both inbound and outbound aircraft noise levels.	<i>Yes but also include reference to publishing the annual report of the NMB which will list the successes of work programme.</i>	Performance Indicator Amended. Indicator: Implementation progress reports. Reported: to each NMB meeting with public reports published annually.	Accept. GATCOM also recommends that as part of this action options to provide respite for those communities under multiple use flight paths, particularly for areas where aircraft are generally lower than 4000ft.
31a.		Action recommended by GATCOM: <i>Work to identify noise metrics and reporting to support the measurement of, and track the progress of, the NMB work plan and Noise Action Plan initiatives.</i>	New action not included:	See comments in covering letter.
39.	We will update to our website the following noise contours: <ul style="list-style-type: none"> • Summer 16 hour day forecast L_{Aeq} contours for air noise • Night forecast contours for ground noise • Forecast L_{den} contours for air noise 	<i>The Night contours should be for the whole night period (23:00-07:00) rather than the Quota Period (23:30-06:00). 'Summer Leq contours' are a repeat of the Summer 16hr Leq contours above</i>	Action amended to read: We will update to our website the following noise contours: <ul style="list-style-type: none"> • Summer 16 hour day Leq (actual) • Summer 16 hour day (standard) Leq • Summer Night Leq (actual) • The above compared to the 	The production of N60 night contours around Gatwick Airport has been identified as an important tool by the Local Authority Environmental Health Practitioners to help identify those most

	<ul style="list-style-type: none"> • Night quota period 48dB LAeq contour (07:00-23:00) • Summer Leq contours 		<p>previous year.</p> <ul style="list-style-type: none"> • Summer Night 10 year average modal split Leq 	<p>affected by night noise and also to assist the Local Authorities to control and ensure adequate mitigation for housing developments within their Authorities. At the recent NMB workshop on noise contours and metrics it was identified by attendees that there was a need for supplementary noise metrics, N60 contours being one of those metrics identified.</p> <p>Recommend that GAL address this point in the final NAP and that it be treated as a priority.</p>
39a.		<p>Action recommended by GATCOM:</p> <p><i>We will produce updated N60 contours for the night period (and 60dB LASmax average contours for the most frequent aircraft types (5% or more of total movements) using Gatwick at night (23:00-07:00).</i></p>	<p>New Action partially included</p> <p><i>We will conduct a review of Government policy to identify new noise metrics and reporting to compliment the current noise contours and measure our noise performance.</i></p>	<p>Accept but see comments in covering letter about the need for general overarching targets and the need for this to be a priority item.</p>
42.	<p>We will continue to offer various methods for complaints about aircraft noise events.</p>	<p><i>Following many complaints it has been agreed to re-instate a phone service for noise complaints. Reference to which should be included in this condition.</i></p>	<p>Recommendation included in 'AIM':</p> <p><i>Implementation of a complaints phone line by the end of 2018.</i></p>	<p>Accept</p>