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Gatwick Airport Consultative Committee

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2 February 2018

Dear Andy,

**REVISED DRAFT END NOISE ACTION PLAN 2019-2024
CONSULTATION ON THE DRAFT LIST OF ACTIONS**

The opportunity to consider and comment on the draft list of actions for inclusion in the revised END Noise Action Plan (END NAP) to cover the period 2019 – 2024 is welcomed. GATCOM considered its response to your consultation on the draft list of actions at its meeting on 25 January 2018 and its response is as follows:

General Overview

GATCOM notes that Defra only requires a “light touch review” of the current END NAP but the Committee is pleased to note that from the 53 proposed list of actions, 27 are new actions which reflect the different circumstances and impacts arising from the airport’s current operation. GATCOM has considered the views received from its members on the draft list of actions, including those from the Environmental and Amenity Groups’ representative whose response was reported in full to the meeting of GATCOM on 25 January 2018.

GATCOM is not aware of any active assessment or management by Defra of the END NAP once approved or any incentives given to effectively deliver the actions included in the Plan. GATCOM considers it important therefore that as traffic at the airport grows GAL needs to establish measures to link traffic growth to noise impacts with agreed workable metrics to assess performance against noise reduction targets and to which GAL may be held to account; and to ensure robust independent monitoring and challenge.

GATCOM acknowledges that the END NAP forms part of a suite of documents prepared by GAL (the suite comprising the END NAP, the Section 106 agreement, the Decade of Change strategy, the NMB work plan and the Flight Performance Team’s Quarterly and Annual reports), and is viewed as the overarching statutory, strategic, plan that sets out how GAL will address and manage the noise climate around Gatwick over a five year period. It is also recognised that the establishment of Gatwick’s Noise Management Board (NMB) has provided the main vehicle through which GAL, together with industry partners, is seeking to take forward a range of initiatives to address the noise impact of the airport’s operations. The NMB’s annual work plan and the priorities identified with community groups will therefore be a key driver to delivering the END NAP actions over the period of the plan. The role of Gatwick’s Noise and Track Monitoring Group (NATMAG) in the monitoring of the airport’s performance and helping to identify issues and trends is also important and will help to ensure improvement in operational performance is maintained and/or improved. It is highly appropriate therefore for the

work of those groups to be referenced in the END NAP list of actions and their progress to be published in their annual reports.

It is also important that the reviewed END NAP remains a feature of the Section 106 agreement between GAL, Crawley Borough Council and West Sussex County Council now and into the future and is included as part of the annual monitoring regime which is subject to scrutiny by an independent environmental consultant. The current arrangements provide for the environmental consultant to give a view on whether the NAP is fit for purpose and whether GAL should consider revisions to the action plan. As at present, the outcome of the independent verification of the monitoring regime will continue to help inform the work and priorities of the NMB and NATMAG. As the Section 106 agreement is currently being updated, GATCOM has sent a copy of this response to all parties to the agreement so that they can consider how to improve the robustness of the current annual monitoring and independent verification regime.

Proposed Actions

The proposed actions are supported as they provide clear commitments from GAL over the longer term to manage the noise impact around Gatwick. However, it is important that the actions are outcome based and measurable. As currently drafted the wording of some actions does not clearly provide an indicator to satisfactorily measure success of delivering improvements to the noise climate. For example, Action 31 is the implementation of new initiatives but how will the success of the implementation of new initiatives be measured? GATCOM therefore requests that GAL reviews the wording of the actions to ensure they are outcome based and/or measurable where possible. It is also suggested that for those actions from the current END NAP which have been removed, the rationale for their removal is provided in each and every case.

GATCOM's specific comments on the proposed list of actions are set out in the attached schedule which GAL is also asked to take into account in the final draft list of actions. GAL's particular attention is drawn to two proposed new actions – Action 31a and Action 39a.

GATCOM acknowledges the concerns of local communities about the need for GAL and the industry to address the impact of incremental traffic growth on the noise climate. To help give confidence to communities that GAL is actively and seriously addressing this concern and to pick up a new work stream of the NMB, the Committee suggests an additional action – new Action 31a. The inclusion of this action will bring into the END NAP process GAL's work to identify noise metrics and reporting which will enable the airport's growth and noise reduction performance to be more robustly measured and tracked.

GATCOM is also concerned to ensure that the health effects of night noise impacts are better understood. It is noted that actions have been included to address night noise but it is suggested that an additional action be included – Action 39(a) to place a commitment on GAL to produce and publish updated N60 contours for the night period (23:00-07:00) as this will help inform the understanding of sleep disturbance on the residents surrounding Gatwick.

Finally, it is important that GAL identifies in the final list of actions some actions that should be treated as a priority where they could bring potential improvements to benefit communities in the short term or will improve monitoring and understanding early in the plan period. GATCOM has identified the following actions for consideration as priorities – Actions 9, 25, 31a 39 and 39a.

Conclusion

GATCOM trusts the above comments together with those set out in the attached schedule can be taken into account in the revisions to the Final Draft Reviewed END NAP. The Committee looks forward to having the opportunity to consider the Final Draft of the NAP before it is agreed for submission to Defra.

Yours sincerely,



Assistant Secretary

BY EMAIL

Andy Sinclair
Head of Airspace Strategy and Engagement
Gatwick Airport Limited

GATCOM RESPONSE

REVISED DRAFT END NOISE ACTION PLAN

GAL's CONSULTATION ON THE DRAFT LIST OF ACTIONS

Revision of the Environmental Noise Directive Noise Action Plan 2019 – 2024

Under the Environmental Noise (England) Regulations 2006, Gatwick Airport Ltd is required to produce a Noise Action Plan at least every 5 years. The Noise Action Plan is designed to manage noise issues and effects arising from aircraft departing from and arriving at the airport. This is the third version of the Environmental Noise Directive Noise Action Plan and it continues to align with the S106 Legal Agreement with West Sussex County Council and Crawley Borough Council. The Action Plan will run from 2019 to 2024.

The Noise Action Plan has to be submitted to the Secretary Of State for Defra for formal adoption. The adopted action plan must then be presented to the EU no later than 18th January 2019.

Gatwick Airport Limited is required to consult on the proposed Noise Action Plan and the consultation process commenced on the 9th November 2017 and comments have to be submitted to GAL by Friday 2nd February 2018.

The Noise Action Plan contains 53 actions which are combination of retained actions from the previous NAP (8), revised actions from the previous NAP (18) and new actions (27). The Table below lists the actions with the proposed comments from GATCOM in red.

Two additional actions are proposed by GATCOM (Actions 31A & 39A).

Proposed Environmental Noise Directive Action Plan Actions 2019 – 2024

| ACTION | IMPACT | TIMESCALE | PERFORMANCE INDICATOR | |
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| QUIET FLEET | | | | |
| 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. | Arrivals, Departures and Ground | On-going | Track fleet mix including % of Chapters 4 and 14 aircraft | <i>Publishing the track fleet mix would allow year on year comparison. Could use an index which uses the QC system to calculate average for summer/winter.</i> |
| 2. We will continue to apply charging penalties to those aircraft operators of Airbus A320 family aircraft that have not had the Fuel over Pressure Protector | Arrivals, Departures and Ground | On-going | Percentage of A320 fleet retrofitted or delivered with modification in place | <i>Yes</i> |

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| | Modification retrofitted. | | | | |
| 3 | We will review the landing fee differential at least every five years. | Arrivals, Departures and Ground | 5 yearly | Publication of landing fees | <i>Or in response to a change of circumstances (i.e. FOPP)</i> |
| 4. | In conjunction with our airline partners we will seek to re-introduce, by the end of this Noise action Plan period a programme that will rank our airline partners in relation to their overall performance for a range of noise and emissions impacts potentially including, but not limited to metrics such as compliance with abatement techniques, fleet age, engine fit and passenger loads per km. | Arrivals, Departures and Ground | 2019 (part of NMB 2017/18 workplan) | Publication of Quiet and Clean Gatwick League Tables | <i>This is welcomed but the focus should be to encourage the less good performers to keep up with the good performers.</i> |
| 5. | Gatwick Airport Ltd will consult with its airline partners annually regarding the Airport Charges Structure. The Noise Management Board will also be asked for its feedback. | Strategic Approach | Annually | Publication of annual aeronautical charges and Airline / Noise Management Board participation | Yes |
| NIGHT TIME OPERATIONS | | | | | |
| 6. | We will continue to administer the Department for Transport night flight regime and ensure that we operate at night within the prescribed ATM and QC limits. | Arrivals and Departures | On-going | Publication of night time flying reports | Yes |
| 7. | We will report on a quarterly basis to the Noise and Track Monitoring Advisory Group the number of flights delayed from planned daytime arrival into night movements (after 23:30 local). | Arrivals | Quarterly / Annually | Publication of statistics to the Noise and Track Monitoring Advisory Group | Yes |
| 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. | Arrivals and Departures | On-going | Publication of statistics to the Noise and Track Monitoring Advisory Group | <i>Yes but also suggest include reference to reporting to FLOPSC</i> |
| 9. | We will implement a voluntary ban on operations of Quota Count 4 aircraft within the core night period by the end of 2024. | Arrivals and Departures | 2024 | Implementation of such a ban Quota Count 4 aircraft are already subject to a scheduling ban in then night period | <i>This should be brought forward to 2019. Alternatively introduce a charging differential (like FOPP) where there is a significantly increased charge from 2019 on QC4s at night.</i> |
| GROUND NOISE CONTROL | | | | | |
| 10. | We will continue to monitor adherence to and review the effectiveness of our ground noise operational controls. | Ground | On-going | Performance tracked through quarterly meetings of the Noise and Track Monitoring Advisory Group (Ground Noise Standing Agenda item) Statistics reported annually in the Section 106 | Yes |

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| | | | Annual Monitoring Report | |
| <p>11. We will report on a quarterly and annual basis the following:</p> <ul style="list-style-type: none"> Fixed Electrical Ground Power availability. The amount of Ground Power Unit dispensations granted. The number of audit checks of aircraft auxiliary power unit running. The number of non-compliances of aircraft auxiliary power unit runs identified. The number of aircraft engine runs undertaken. | Ground | On-going | <p>Performance tracked through quarterly meetings of the Noise and Track Monitoring Advisory Group (Ground Noise Standing Agenda item)</p> <p>Statistics reported annually</p> | Yes |
| <p>12. We will continue to minimise aircraft auxiliary power unit use in order to reduce ground noise and local air quality emissions via Gatwick Airport Directives and monitoring of compliance.</p> | Ground | On-going | <p>Publication of Gatwick Airport directives pertaining to Auxiliary power unit usage and audit findings reported to the Noise and Track Monitoring Advisory Group</p> | Yes |
| ARRIVING AIRCRAFT | | | | |
| <p>13. We will continue to promote adherence to the Arrivals Code of Practice through groups such as FLOPSC, Sustainable Aviation and other engagement events.</p> | Arrivals | On-going | <p>Reports to the Flight Operations Performance and Safety Committee, Noise and Track Monitoring Advisory Group and contributions to Sustainable Aviation publications</p> | YES |
| <p>14. We will continue to promote, monitor, seek to improve and report on adherence to the arrival noise abatement procedures detailed in the London Gatwick Aeronautical Information Publication.</p> | Arrivals | On-going | <p>Adherence to the noise abatement procedures - reported in quarterly and annual Flight Performance Team Reports</p> | Yes |
| <p>15. In conjunction with the Noise Management Board, Gatwick Airport will identify a low noise arrival procedure which will capture Low Power Low Drag measures and result in a metric which will supplement Continuous Descent Operations as an additional measurable target.</p> | Arrivals | 2024 | <p>Introduction of such an enhanced procedure and measure which will be included in subsequent reporting</p> | Yes |
| <p>16. In line with Noise Management Board initiatives and the commitments in the Sustainable Aviation Noise Road Map, we will work with our airlines and air navigation services providers to improve CDO at Gatwick.</p> | Arrivals | On-going | <p>Continuous Descent Achievement rates monitored and reported to the Flight Operations Performance and Safety committee (bi-monthly) and to the Noise and Track Monitoring Advisory Group (quarterly) and published online in Flight Performance Team reports</p> | Yes |
| <p>17. We will implement agreed Noise Management Board Work Plan solutions that are intended to reduce the noise</p> | Arrivals | 2019 - 2024 | <p>Delivery of agreed Noise Management Board Work Plan activities.</p> | Yes |

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| impact of arriving aircraft. | | | | |
| DEPARTURES | | | | |
| 18. We will continue to promote adherence to the Departures Code of Practice through groups such as FLOPSC, Sustainable Aviation and other communication events. | Departures | On-going | Reports to the Flight Operations Performance and Safety committee, Noise and Track Monitoring Advisory Group and contributions to sustainable Aviation publications | Yes |
| 19. We will continue to promote, monitor, seek to improve and report on adherence to the departure noise abatement procedures detailed in the London Gatwick Aeronautical Information Publication. | Departures | On-going | Adherence to the noise abatement procedures - reported in quarterly and annual Flight Performance Team Reports | Yes |
| 20. We have an annual limit of no more than 5% off-track departures. In future, we will compare on an annual basis the percentage of off-track departures against the average performance over the previous five years. | Departures | 2019 - 2024 | Track keeping statistics | Yes |
| 21. In conjunction with our partners and the Noise Management Board we will adopt a preferred Noise Abatement Departure Procedure. | Departures | 2019 | Adoption of a specific Noise Abatement Departure Procedure | Yes |
| 22. We undertake to explore opportunities to remove the altitude restrictions on Route 3 and 4 intended to reduce the noise impact of departing aircraft noise. | Departures | 2020 | Opportunities converted into airspace change proposals to implement such changes | Yes |
| 23. We undertake to explore the feasibility of introducing an alternative Standard Instrument Departure routes within our Noise Preferential Routes in order to provide dispersions and / or respite. | Departures | 2019 (part of NMB 2017/18 workplan) | Introduction of alternate Standard Instrument Departure routes within the extant Noise Preferential Routes | Yes |
| AIRLINE SUPPLEMENTARY CHARGES | | | | |
| 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 | Departures | On-going | Aircraft noise infringements identified by the airport Noise and Track Keeping system and monies paid 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> |
| 25. We will engage with the Department for Transport and the Aircraft Noise Management Advisory Committee to review departure noise limits at Gatwick Airport. | Departures | 2024 | Revision of departure noise limits | <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> |
| 26. We will work with our airlines and noise governance groups to explore the feasibility of introducing supplementary | Departures | On-going | Departure infringements identified by the airport Noise and Track Keeping system and monies paid to the Gatwick Airport Community Trust | Yes |

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| charges for aircraft departures which persistently fail to operate in accordance with Noise Preferential Routes prescribed for the airport as measured by the noise and track monitoring system operated by Gatwick Airport Ltd, with all such monies passed to the Gatwick Airport Community Trust | | | | |
| MITIGATION SCHEMES | | | | |
| 27. We will continue to provide a vortex-damage repair scheme to repair roofs that have been damaged by aircraft vortices. | Community assistance scheme | On-going | Applications received for damage repair | Yes |
| 28. We will continue a scheme that helps with the cost of acoustically insulating homes against the effects of aircraft noise. We undertake to review the scheme every 5 years to ensure it remains appropriate and relevant. | Community noise mitigation initiative | 2019 - 2024 | Number of properties receiving insulation assistance | Yes |
| 29. We will continue to offer acoustic insulation to noise sensitive buildings within the 63L _{Aeq,16hr} Summer noise contour. | Community noise mitigation | 2019 - 2024 | Number of properties receiving insulation assistance | 2014 scheme expanded to include the 60dB LAeq16hr. |
| 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 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. | Community noise mitigation Initiative | On-going | Applications received for the scheme | 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 overflowed then a lower figure should be considered. |
| NOISE REDUCTION MEASURES | | | | |
| 31. In conjunction with the Noise Management Board we will explore innovative methods to reduce both inbound and outbound aircraft noise levels. 31a 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. | Arrivals Departures Arrivals Departures | 2019 – 2024 2019-2020 | Implementation of any new initiatives as detailed in the Noise Management Board work plan Implementation of noise metrics to start measuring and tracking progress of the airport's noise reduction performance from a base year to be agreed by the NMB | Yes but also include reference to publishing the annual report of the NMB which will list the successes of work programme. |
| MONITORING AND REPORTING OUR PROGRESS | | | | |
| 32. We will ensure that our Noise and Track Keeping systems are suitable, relevant and reliable, providing updates as appropriate. | Arrivals Departures | On-going | Provision of the Noise and Track Keeping service, including updates where appropriate Feedback from relevant stakeholders | Yes |
| 33. We will continue to provide public access | Arrivals | On-going | Provision of flight track information and noise | Yes |

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| to flight track information and noise related data via the Gatwick Airport noise website and the online flight tracking facility, available both on desktop and mobile devices. | Departures Ground | | related material online Feedback from relevant stakeholders | |
| 34. We will continue to provide a Flight Performance Team (FPT) service and implement service improvements where identified. The FPT will continue to provide accurate and timely data to aid strategy development and noise complaint handling. | Arrivals Departures Ground | On-going | Provision of FPT services including but not limited to: <ul style="list-style-type: none"> • Support to NMB initiatives • Noise Abatement Reporting • Ad-hoc Analysis • Night Flight Administration • Complaints Handling | Yes |
| 35. We will improve the availability of, and access to, airspace and noise related data. | Strategic Approach | 2020 | Publication of data in the improved format | Yes |
| 36. We will explore the feasibility of introducing an information service for local communities. This could include updates on airport operations, e.g. scheduled northern runway operations, change in runway direction, meteorological information, scheduled number of aircraft movements during the day and night periods, reported thunderstorm activity etc. | Arrivals Departures Ground | 2022 | Publication of information | Yes |
| 37. We will continue to provide a Community Noise Monitoring Scheme, operated under the supervision of the Noise and Track Monitoring Advisory Group and the Gatwick Noise Monitoring Group. | Arrivals Departures | On-going | Deployment of mobile noise monitoring terminals to locations around the airport as proposed by the Gatwick Noise Monitoring Group and agreed by the Noise and Track Monitoring Advisory Group | Yes |
| 38. We will report progress against the published Noise Abatement Procedures contained within the London Gatwick Aeronautical information Publication and this Noise Action Plan on a quarterly basis to the Noise and Track Monitoring Advisory Group, the Gatwick Airport Consultative Committee and on our webpages. | Arrivals Departures Ground | On-going | Reports produced, published and circulated | Yes |
| 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 | Arrivals Departures Ground | On-going | Noise contours published and any emerging trends identified | <i>The Night contours should be for the whole night period (23:00-07:00) rather than the Quota Period (23:30-06:00).</i> <i>'Summer Leq contours' are a repeat of the Summer 16hr Leq contours above</i> |

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| <ul style="list-style-type: none"> Night quota period 48dB L_{Aeq} contour (07:00-23:00) Summer L_{Aeq} contours | | | | |
| <p>39(a) We will produce updated N60 contours for the night period (and 60dB L_{ASmax} average contours for the most frequent aircraft types (5% or more of total movements) using Gatwick at night (23:00-07:00).</p> | <p>Arrivals Departures</p> | <p>2020</p> | <p>Noise contours published</p> | <p>The 60dB contour equates to an internal noise level of 45dB L_{Amax} with the windows open, which is recognised as the level that will give rise to sleep disturbance. This Action is to help inform the understanding of sleep disturbance on the residents surrounding Gatwick.</p> |
| <p>MANAGING AIRCRAFT NOISE COMPLAINTS</p> | | | | |
| <p>40. We will seek to respond to at least 95% of all complaints and enquiries within eight working days of receipt, in line with the extant Complaints Handling Policy, and publish our performance in FPT quarterly reports.</p> | <p>Arrivals Departures Ground</p> | <p>On-going</p> | <p>Performance tracked through quarterly FPT reports and published online</p> | <p>Yes</p> |
| <p>41. We will continue to log all complaints relating to aircraft operations in line with the extant Noise Complaints Handling Policy and publish the statistics on our website quarterly.</p> | <p>Arrivals Departures</p> | <p>On-going</p> | <p>Performance tracked through quarterly FPT reports and published online</p> | <p>Yes</p> |
| <p>42. We will continue to offer various methods for complaints about aircraft noise events.</p> | <p>Arrivals Departures Ground</p> | <p>On-going</p> | <p>Available options utilised by noise complainants</p> | <p>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.</p> |
| <p>43. In order to achieve community confidence in the Complaints Handling Policy and provide transparency of information, we will, where appropriate update our procedures relating to the receipt, processing and reporting of aircraft noise complaints.</p> | <p>Strategic Approach</p> | <p>On-going</p> | <p>Updates to the Complaints Handling Policy</p> | <p>Yes</p> |
| <p>ENGAGEMENT</p> | | | | |
| <p>44. Gatwick will continue to engage actively with Government, the Regulator, Sustainable Aviation and such ad-hoc reviews that may be established and will respond appropriately to relevant</p> | <p>Strategic Approach</p> | <p>On-going</p> | <p>Engagement with Government, the Regulator, Sustainable Aviation and such ad-hoc reviews that may be established and input to the consultations, engagement exercises and recommendations as appropriate</p> | <p>Yes</p> |

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| consultations, engagement exercises and recommendations arising from those activities. | | | | |
| 45. Gatwick Airport will implement relevant recommendations resulting from feasibility studies in conjunction with the CAA and the DfT as and when they are released. | Strategic Approach | On-going | Implementation of recommendations as required | Yes |
| 46. We will continue to engage with local communities through the established noise governance groups. | Arrivals Departures Ground | On-going | Participation with the established noise governance groups | Yes |
| 47. We will continue to support the existence of, and engage with a Noise Management Board, the workplan and meeting papers, which will be adequately published to our other noise governance groups and online. | Arrivals Departures Ground | On-going | Maintenance of the Noise Management Board and delivery of outputs | Yes |
| 48. We will continue to engage with and provide noise data as required to local Environmental Health Officers through the Gatwick Noise Monitoring Group. | Strategic Approach | On-going | Operation of the Gatwick Noise Monitoring Group, circulation of noise data and publication of reports as appropriate | Yes |
| 49. In conjunction with the Gatwick Noise Monitoring Group we will commission noise studies to gain an insight into the noise climate in a particular area and we will publish these on our website. | Arrivals Departures Ground | On going | Publication of annual noise studies | Yes |
| 50. We will continue to host an annual airspace seminar, to include an annual update from the Noise Management Board, inviting local interest groups and stakeholders. | Arrivals Departures Ground | On going (annually) | Hosting of the event | Yes |
| 51. We will continue to engage with local planning authorities in order to ensure they are well informed about noise issues at Gatwick, and to provide information on the airport and its operation. | Strategic Approach | On-going | Quarterly S106 steering group meetings | Yes |
| FUTURE AIRSPACE CHANGE | | | | |
| 52. We will participate in all activities relating to 'LAMP2' – the redesign of the London Terminal Manoeuvring Area (LTMA) and en-route airspace to eliminate chokepoints, alleviate areas of intensive aircraft concentrations, and to create a | Arrivals Departures Ground | 2024 | LAMP 2 airspace implemented | Yes |

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| structure that has capacity to accommodate forecast traffic levels beyond 2040. | | | | |
| 53. Ensure that local communities are informed about LAMP 2 plans and the progress and airport plans for the integration of Gatwick specific departure and arrival procedures. | Arrivals Departures Ground | 2024 | Evidence of community engagement | Yes |