

YOUR LONDON AIRPORT
Gatwick



Gatwick Airport Ltd

Environmental Noise Directive

Noise Action Plan 2019 – 2024

Annex Document



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ANNEX 1 – GLOSSARY OF TERMS

AAL	Above Aerodrome Level
AMSL	Above Mean Sea Level
ACARE	Advisory Council for Aeronautical Research in Europe
ACOP	Arrivals Code of Practice
ACP	Airspace Change Proposal
AEF	Aviation Environment Federation
AIP	Aeronautical Information Publication
ANASE	Attitudes to Noise from Aviation Sources in England
ANEG	Airspace and Noise Engagement Group
ANMAC	Aircraft Noise Monitoring Advisory Committee. The committee is chaired by the Department for Transport and comprises, among others, representatives of the airlines, Heathrow, Gatwick and Stansted airports and airport consultative committees at these airports.
ANS	Air Navigation Solutions Ltd
AONB	Area of Outstanding Natural Beauty
APU	Auxiliary Power Unit. A power unit located on the aircraft.
APF	Aviation Policy Framework
ATC	Air Traffic Control
ATWP	Air Transport White Paper
BAA	BAA Ltd, the company which previously owned Gatwick, Stansted and Edinburgh airports. Now known as Heathrow Airport Holdings Ltd.
CAA	Civil Aviation Authority
CDO	Continuous Descent Operations
CNG	Community Noise Group (attends the Noise Management Board)
dB (A)	A unit of sound pressure level, adjusted in accordance with the A weighting scale, which takes into account the increased sensitivity of the human ear at some frequencies.
Decibel (dB)	The decibel (dB) is a logarithmic unit of measurement that expresses the magnitude of a physical quantity relative to a specified or implied reference level. Its logarithmic nature allows very large or very small ratios to be represented by a convenient number. Being a ratio, it is a dimensionless unit. Decibels are used for a wide variety of measurements including acoustics, and for audible sound A-weighted decibels (dB (A)) are commonly used.
DEFRA	Department for Environment Food and Rural Affairs (UK Government)
DfT	Department for Transport (UK Government)

ECAC	European Civil Aviation Conference
EHSOR	Environment, Health, Safety and Operational Resilience (committee)
EMB	Executive Management Board (of Gatwick Airport)
END	Environmental Noise Directive
EPNdb	Effective Perceived Noise Decibels (EPNdb). It refers to the metric 'EPNL' (Effective Perceived Noise Level) which is used for noise certification and takes account of tones and duration.
ERCD	Environmental Research and Consultancy Department of the Civil Aviation Authority
FAS	Future Airspace Strategy
EHO	Environmental Health Officer
FEGP	Fixed Electrical Ground Power
FLOPSC	Flight Operations Performance & Safety Committee
FPT	Flight Performance Team (previously known as the Flight Evaluation Unit)
GAL	Gatwick Airport Limited, the owner and operator of London Gatwick Airport
GATCOM	Gatwick Airport Consultative Committee
GNC	Ground Noise Committee
GNMG	Gatwick Noise Monitoring Group
GPU	Ground Power Unit
ICAO	International Civil Aviation Organization
ILS	Instrument Landing System
LAMP	London Airspace Management Programme
LOAEL	Lowest Observable Adverse Effect Level
LP/LP	Low Power / Low Drag
L_{A90}	A-weighted sound level exceeded for 90% of the time
$L_{Aeq, 16h}$	The A-weighted average sound level over the 16 hour period of 07:00 – 23:00
$L_{Aeq,T}$	The notional A-weighted equivalent continuous sound level which, if it occurred over the same time period, would give the same noise level as the actual varying sound level. The T denotes the time period over which the average is taken, for example $L_{Aeq,8h}$ is the equivalent continuous noise level over an 8 hour period.
L_{day}	The A-weighted average sound level over the 12 hour day period of 07:00 - 19:00
L_{den}	The day, evening, night level, L_{den} is a logarithmic composite of the L_{day} , $L_{evening}$, and L_{night} levels but with 5 dB(A) being added to the $L_{evening}$ value and 10 dB(A) being added to the L_{night} value.

L _{eq}	Equivalent sound level of aircraft noise in dB(A), often called equivalent continuous sound level. For conventional historical contours this is based on the daily average movements that take place in the 16 hour period (07:00 - 23:00 LT) during the 92 day period 16 June to 15 September inclusive.
L _{evening}	The A-weighted average sound level over the 4 hour evening period of 19:00 - 23:00
L _{night}	The A-weighted average sound level over the 8 hour night period of 2300 – 0700
MCR	Managing Corporate Responsibility (committee)
NADP	Noise Abatement Departure Procedure
NAP	Noise Action Plan
NATMAG	Noise and Track Monitoring Advisory Group
NATS	Formerly known as National Air Traffic Services Ltd. NATS is licensed to provide en-route air traffic control for the UK and the Eastern part of the North Atlantic, and also provides air traffic control services under contract at several major UK airports.
Noise Contour	Map contour line indicating noise exposure in dB for the area that it encloses
NM	Nautical mile
NMB	Noise Management Board
NOAEL	No Observable Adverse Effect Level
NPR	Noise Preferential Route
NPS	National Policy Statement
NTK	Noise and Track Keeping monitoring system. The system associates radar data from air traffic control radar with related data from noise monitors at prescribed positions on the ground.
PNdB	Perceived Noise Level, measured in PNdB. Its measurement involves analyses of the frequency spectra of noise events as well as the maximum level.
QC	Quota Count - the basis of the London airports Night Restrictions regime.
QNH	Barometric altimeter setting which will cause the altimeter to read altitude above mean sea level.
SA	Sustainable Aviation - a UK aviation industry initiative aiming to set out a long term strategy for the industry to address its sustainability issues.
SOAEL	Significant Observed Adverse Effect Level - this is the level above which significant adverse effects on health and quality of life occur.
S.106	Section 106 (S106) Agreements are legal agreements between Local Authorities and developers; these are linked to planning permissions and can also be known as planning obligations.
WHO	World Health Organisation

ANNEX 2 – EXTRACT FROM THE GUIDANCE FOR AIRPORT OPERATORS BY DEFRA

WHAT NEEDS TO BE INCLUDED IN AN ACTION PLAN?

An Action Plan must be drawn up for places near the airport which are affected by noise from airport operations as shown by the results of the noise mapping and meet a number of requirements set out in the Regulations:

- a description of the airport and any other noise sources taken into account;
- the authority responsible;
- legal context;
- any limit values in place;
- a summary of the results of the noise mapping, including an evaluation of the estimated number of people exposed to noise;
- identification of problems and situations that need to be improved;
- a record of the public consultations that have taken place;
- any noise reduction measures already in force and any projects in preparation;
- long term strategy;
- actions which the airport operator intends to take in the next five years, including measures to preserve quiet areas;
- financial information (if available): budgets, cost-effectiveness assessment, cost-benefit assessment;
- provisions envisaged for evaluating the implementation and the results of the Action Plan; and
- estimates in terms of the reduction of the number of people affected (annoyed, sleep-disturbed, or other).

REVISING AN EXISTING ACTION PLAN

The current plan should be reviewed and revised to include, as necessary:

- updated details about the airport and its operation;
- the results of the noise mapping completed in 2017;
- the progress made against the actions described in the current Action Plan;
- updated information about relevant legislation and standards;
- updated relevant national and local policies;
- information about on-going actions; and
- information about any proposed new actions.

It is envisaged that once the plan has been revised it will be presented to the Airport's Consultative Committee for comment, and any other appropriate bodies depending on the extent and nature of the revisions. The Airport Operator should summarise the comments received in the revised plan together with their response to the issues raised.

SUBMITTING AN ACTION PLAN FOR FORMAL ADOPTION

Once the plan has been updated and finalised, the Regulations require that it be sent to the Secretary of State for DEFRA for formal “adoption”. This document can be sent to DEFRA via the noise@DEFRA.gsi.gov.uk email address and must include prominently displayed wording identifying it as a draft subject to formal adoption and approval.

The Secretary of State for DEFRA, in liaison with the Department for Transport, will form a view regarding whether or not the submitted revised plan meets the requirements of the Regulations and, therefore, whether or not the plan is appropriate for adoption.

- If the Secretary of State for DEFRA considers that the requirements set out in the Regulations are met, they will notify the airport accordingly that the Action Plan has been adopted. The Action Plan should then be published by the Airport Operator as a public document in an electronic format within 28 days.
- If the requirements set out in the Regulations are not met, the airport operator will be required to make the necessary changes to the plan. Following revision, the revised plan will need to be resubmitted to the Secretary of State for DEFRA by an agreed date for further consideration.

ONGOING REQUIREMENT TO REVIEW NOISE ACTION PLANS

The Regulations contain a continuing obligation on Airport Operators to review (and revise, if necessary) the Noise Action Plan every 5 years or sooner where a major development occurs.

Airport Operators may wish to agree to carry out an informal review of the progress being made on the implementation of the Action Plan as part of their continuing engagement with the local airport consultative committee or other stakeholders. The process and timing for any informal review should be jointly agreed between the Airport Operator and the committee, or other stakeholders, as appropriate. Such reviews could form part of any regular environmental reporting that is already undertaken.

It should be noted that the Regulations give the Secretary of State the power to take action should they believe that a requirement of these Regulations is not being met due to any act or omission by the Airport Operator.

UPDATE FROM DEFRA AND DFT

On 9 February 2018, Gatwick Airport Ltd received an update from DEFRA and the DfT in light of queries raised of those departments and also changes to Government’s aviation noise policy.

The following is extracted from the update from DEFRA and DfT:

The purpose of this is to highlight these changes [to the Government’s aviation noise policy] and draw your attention to some other points that have been raised in discussion and should be taken into account in preparing Action Plans.

On 24 October 2017, the Department for Transport published its Consultation Response on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace. You should consider how these changes to government policy need to be reflected in your Noise Action Plans.

Key changes in the policy to consider are:

- The creation of an Independent Commission on Civil Aviation Noise (ICCAN) – This body will be established this spring to help ensure that the noise impacts of airspace changes are properly considered and give communities a greater stake in noise management. ICCAN may issue best practice guidance in relation to noise management, and you should consider the process through which this will be taken into account in your Action Plan.
- Important changes to aviation noise compensation policy, to improve fairness and transparency. Airspace changes have been incorporated into the existing compensation policy so that compensation policy is the same for all changes which affect noise impacts, regardless of whether they are a result of infrastructure change or airspace change.
- A new requirement for options analysis in airspace change, to enable communities to engage with a transparent airspace change process and ensure options such as multiple routes are considered. The Civil Aviation Authority's airspace change process has been revised to take account of this change.
- New metrics and appraisal guidance to assess noise impacts and their impacts on health and quality of life. In particular this will ensure noise impacts are considered much further away from airports than at present. These adverse effects should be assessed using a risk-based approach above the lowest-observed adverse-effect level (LOAEL), using the DfT's transport appraisal guidance WebTAG. Supplementing this risk-based approach with frequency-based noise metrics will ensure that aircraft noise and its impacts can be accurately factored into decisions.

Over the past six months DEFRA has also held a number of discussions about the action planning process with individual airport operators and community groups. In the light of issues raised in those discussions, DEFRA would like to draw to your attention that, when reviewing the Plans submitted for adoption, the Government will pay particular attention to the following aspects set out in the previously circulated guidance:

- "A record of the public consultations that have taken place" (page 11). Some airports have already been in touch with DEFRA to highlight other engagement work that is taking place in parallel to their Noise Action Plan consultations. It is important that the Action Plan process does not contribute to an "overload" in community engagement, and that the consultation is sufficiently long for interested parties to formulate their responses, taking account of other consultations which may be taking place over the same time period and placing a burden on consultees' resources. It is also important that the issues raised by consultees are demonstrably given thorough consideration by airport operators. We shall be looking for evidence of how you have ensured this is the case in your submitted Plans.
- "Estimates in terms of the reduction of the number of people affected (annoyed, sleep disturbed, or other)... as a result of [the measures in] this Action Plan" (p13). Your plans should include evidence that the measures are challenging, objective, quantified (where reasonably practicable), subject to specific timescales, and have taken full account of the views of local communities.
- Where noise reduction measures need the support and active participation of other parties (such as NATS & CAA), please include information on how the airport intends to achieve such co-operation.

ANNEX 3 – STRATEGIC NOISE MAPS 2016

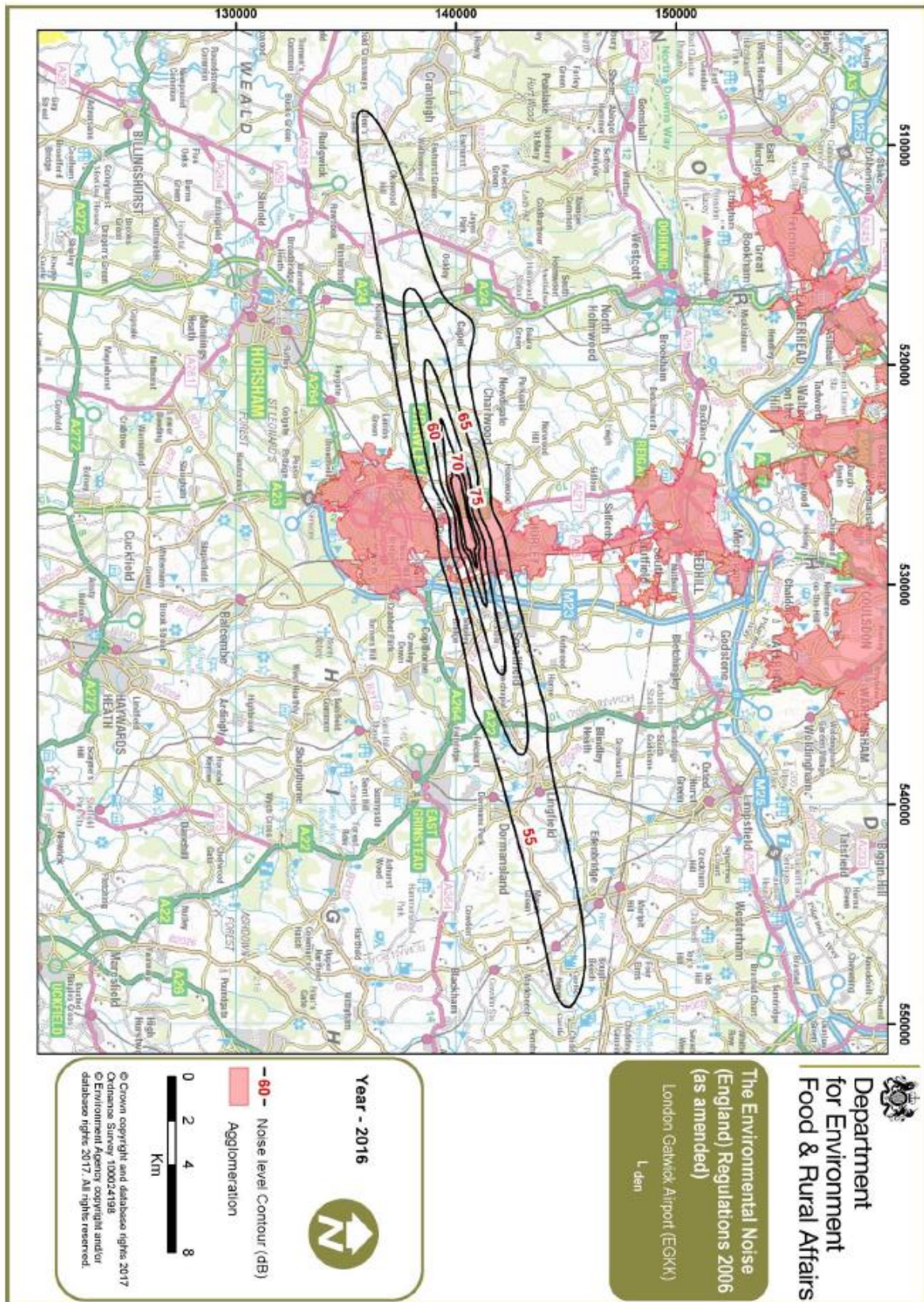


Figure 1: DEFRA Strategic noise maps, L_{den}2016

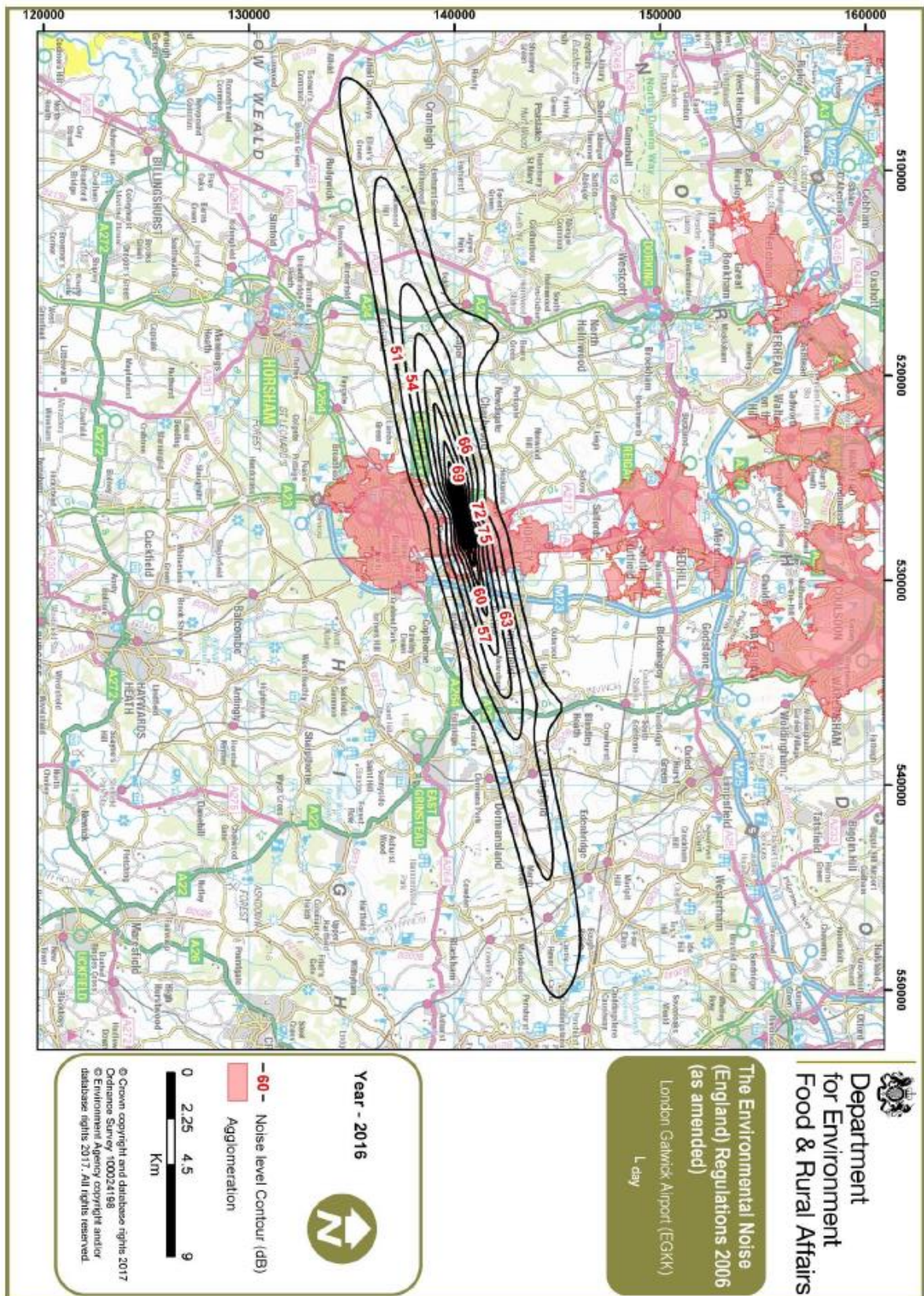


Figure 2: DEFRA Strategic noise maps, L_{day}2016

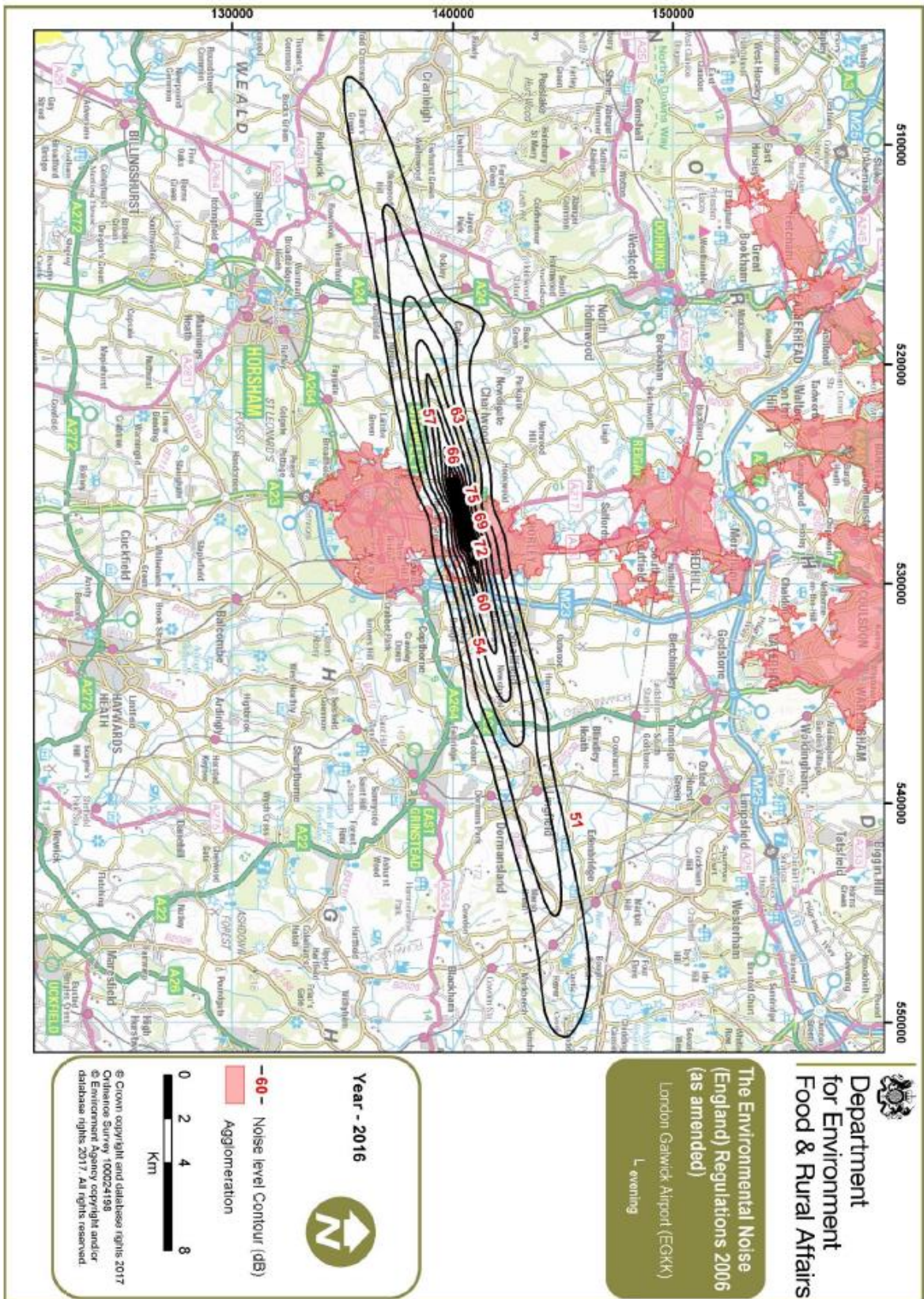


Figure 3: DEFRA Strategic noise maps, L_{evening} 2016

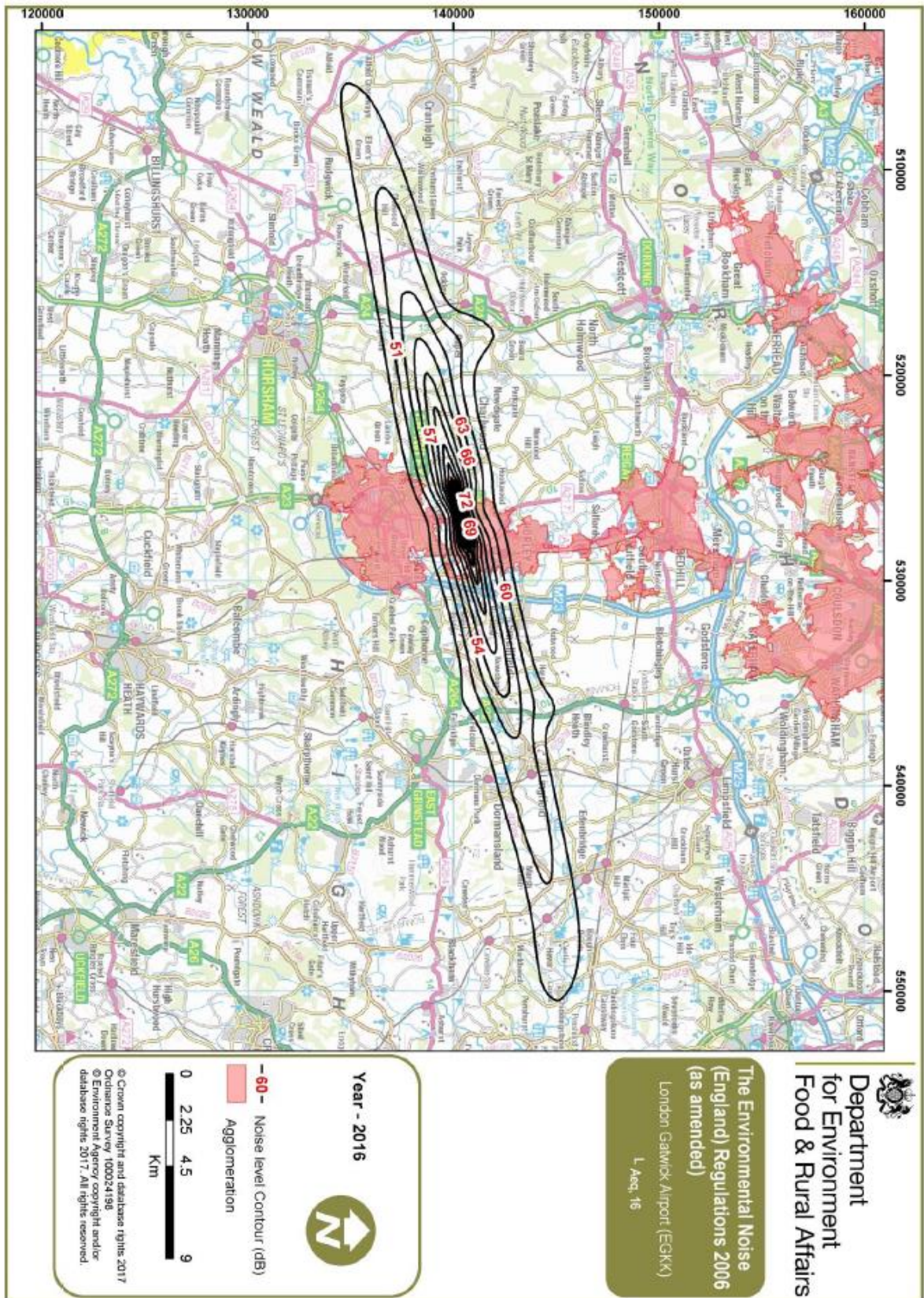


Figure 4: DEFRA Strategic noise maps, L_{Aeq} 16 2016

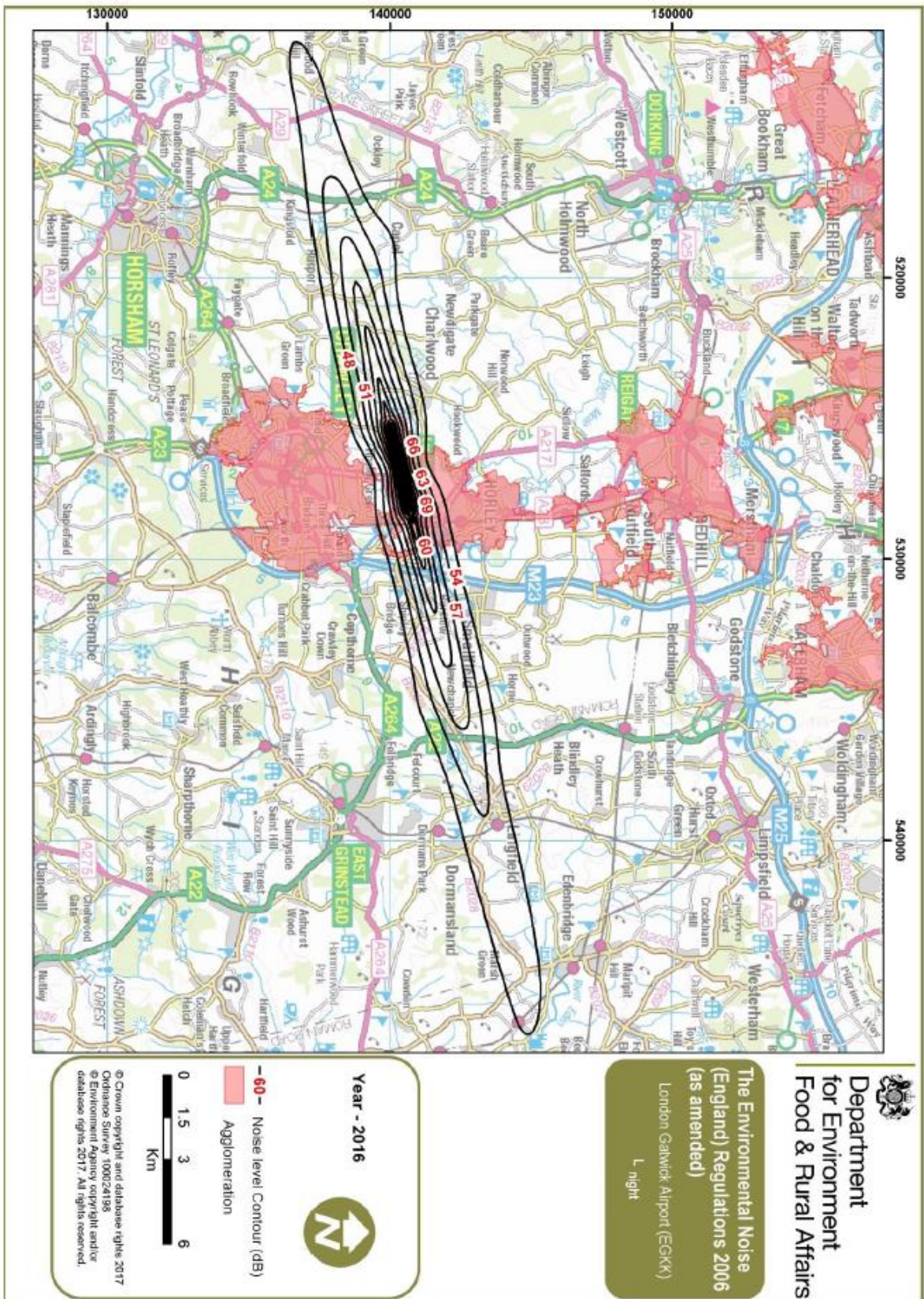


Figure 5: DEFRA Strategic noise maps, L_{night} 2016

ANNEX 4 – STATISTICAL INFORMATION

Figure 6: Statistical information in support of the Noise Action Plan

NOISE MITIGATION MEASURES	2010	2011	2012	2013	2014	2015	2016	2017
Aircraft runway movements	240,462	251,019	246,792	250,527	259,974	267,777	280,089	285,968
West/east runway split	64/36	67/33	71/29	63/37	67/33	70/30	67/33	78/22
Standby runway movements	1,012	2,444	14,836	4,473	1,496	2,498	2,567	3,722
Track keeping performance	96.98%	97.47%	97.63%	98.04%	99.28%	99.71%	98.56%*	98.06%
24 hour CDO performance	89.73%	90.49%	88.56%	91.37%	92.61%	89.75%	88.58%**	90.48%
Day/shoulder CDO performance	89.31%	90.19%	88.72%	91.13%	92.43%	89.21%	88.18%**	90.56%
Core night CDO performance	93.94%	93.96%	85.27%	94.04%	95.25%	95.32%	92.90%**	89.60%
1,000ft infringements	6	3	2	0	0	0	0	0
Departure day noise infringements	0	0	0	0	0	0	0	0
Departure night & shoulder noise infringements	0	4	0	0	0	0	1	2
% Night arrivals joining below 3,000ft (2,598ft)	0.15%	0.13%	0.65%	0.46%	0.16%	0.14%	0.21%	0.14%
% Night arrivals joining below 3,000ft (2,798ft)	6.35%	7.41%	16.12%	4.61%	3.08%	2.42%	2.57%	2.60%
Total night arrivals joining at less than 10nm	3.04%	2.86%	5.87%	2.17%	2.46%	1.91%	4.25%	7.39%
% of arrivals performing go-arounds	0.30%	0.31%	0.42%	0.38%	0.39%	0.39%	0.46%	0.43%
Night jet movements used (Summer)	9,875	9,859	9,837	9,998	11,147	11,149	11,303	11,070
Night jet movements used (Winter)	2,160	1,411	1,603	1,510	1,736	1,872	2,022	1,307 (to end of week 15)
Night jet quota count used (Summer)	4,824	4,998.5	4,993.5	4,821.5	4,943.75	4,765.5	4,912.75	4,527.75
Night jet quota count used (Winter)	1,280.75	9,20.25	1,044	828.5	852.75	953	1,198.25	712.50 (to end of week 15)
Dispensations granted	257	0	0	22	155	435	648	555
Use of 26 WIZAD during night period	1	1	0	0	0	1	0	0
Percentage of Chapter 4 aircraft	98%	96%	99%	99%	99%	99%	99%	99%
57Leq day noise contour area (km ²)	39.6	40.4	41.2	40.9	42.2	42.8	44.2	TBC
57Leq day noise contour population affected	2,850	3,050	3,650	3,250	3,300	3,650	4,150	TBC
57Leq day noise contour households affected	1,250	1,350	1,600	1,350	1,350	1,450	1,700	TBC

*Track Keeping performance monitoring changed on 26th May 2016 to include all SIDs.

**The point at which CDO performance measurement commenced changed on the 1st August 2016 from 6,000ft to 7,000ft.

ANNEX 5 – COMPLAINT DATA

Airports bring positive economic and social benefits as well as environmental impacts. They are important to the economy, providing jobs, encouraging inward investment, and boosting local tourism. However, they can also have an impact for those communities that exist around airports. Noise remains a significant issue for people living or working close to airports or under flight paths. Complaint statistics can be extremely difficult to interpret as a large proportion of all our complaints originate from a very small group of individuals.

The last UK study on aviation noise Attitudes to Noise from Aviation Sources in England (ANASE) concluded that:

‘There is common agreement that people today have higher expectations of a peaceful living environment, are less tolerant of environmental intrusion, and might consequently be less accepting of aircraft noise. This view is supported by social trend data. While both income and taste effects are likely to be important, it is not possible to identify their relative strength from [the ANANSE] research: they are, of course, closely correlated.’

All aircraft noise complaints and enquiries are handled by the Flight Performance Team at Gatwick Airport. The team is responsible for recording, investigating and where applicable responding to aircraft noise complaints and to do so, a specialised complaint handling system is used, combining a database, mapping system and flight and noise records from the Casper Noise and Track Keeping system.

Figure 20 below shows the number of individual callers compared to the number of complaints made between 2010 and 2017. This illustrates one of the difficulties in studying the effects of noise, as people’s tolerance of noise and their perception of what causes annoyance varies widely. It is highly subjective and differs not only between neighbours, but also between socio-economic groups.

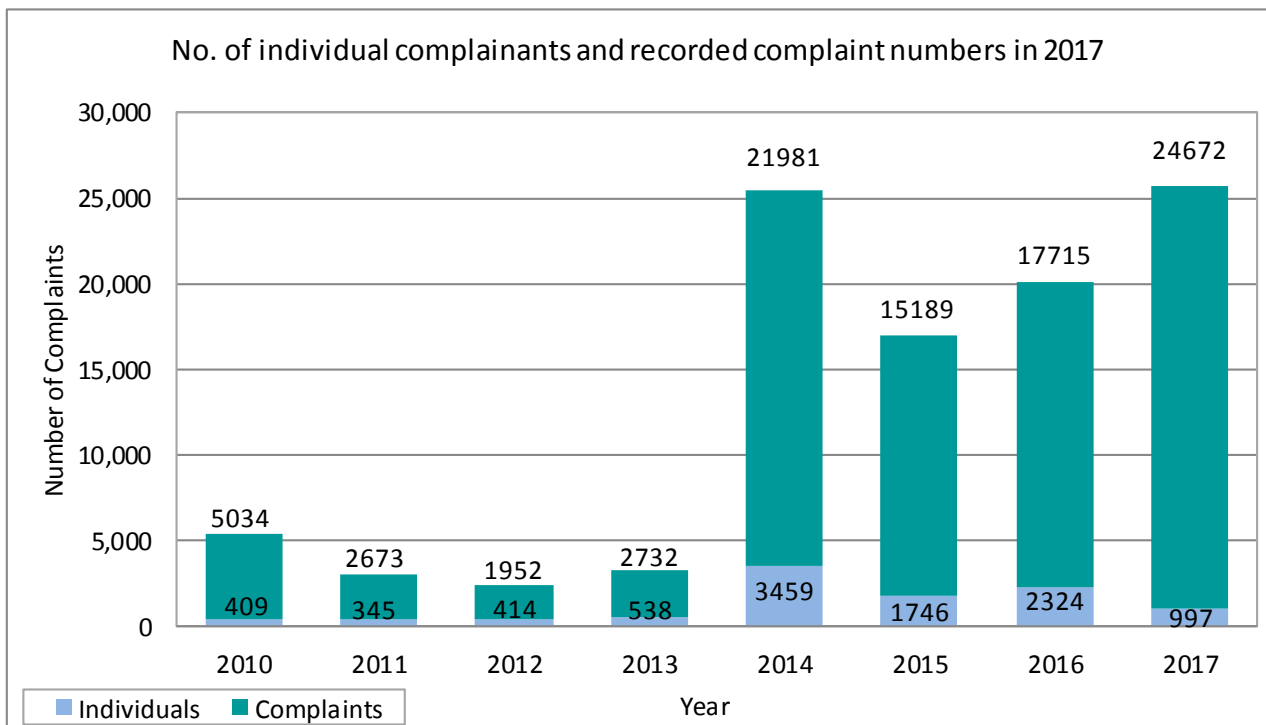


Figure 7: The Number of Individual Complainants and Recorded Complaint Numbers in 2017

The top 20 locations for complaints in 2017 by complaint numbers and complainant

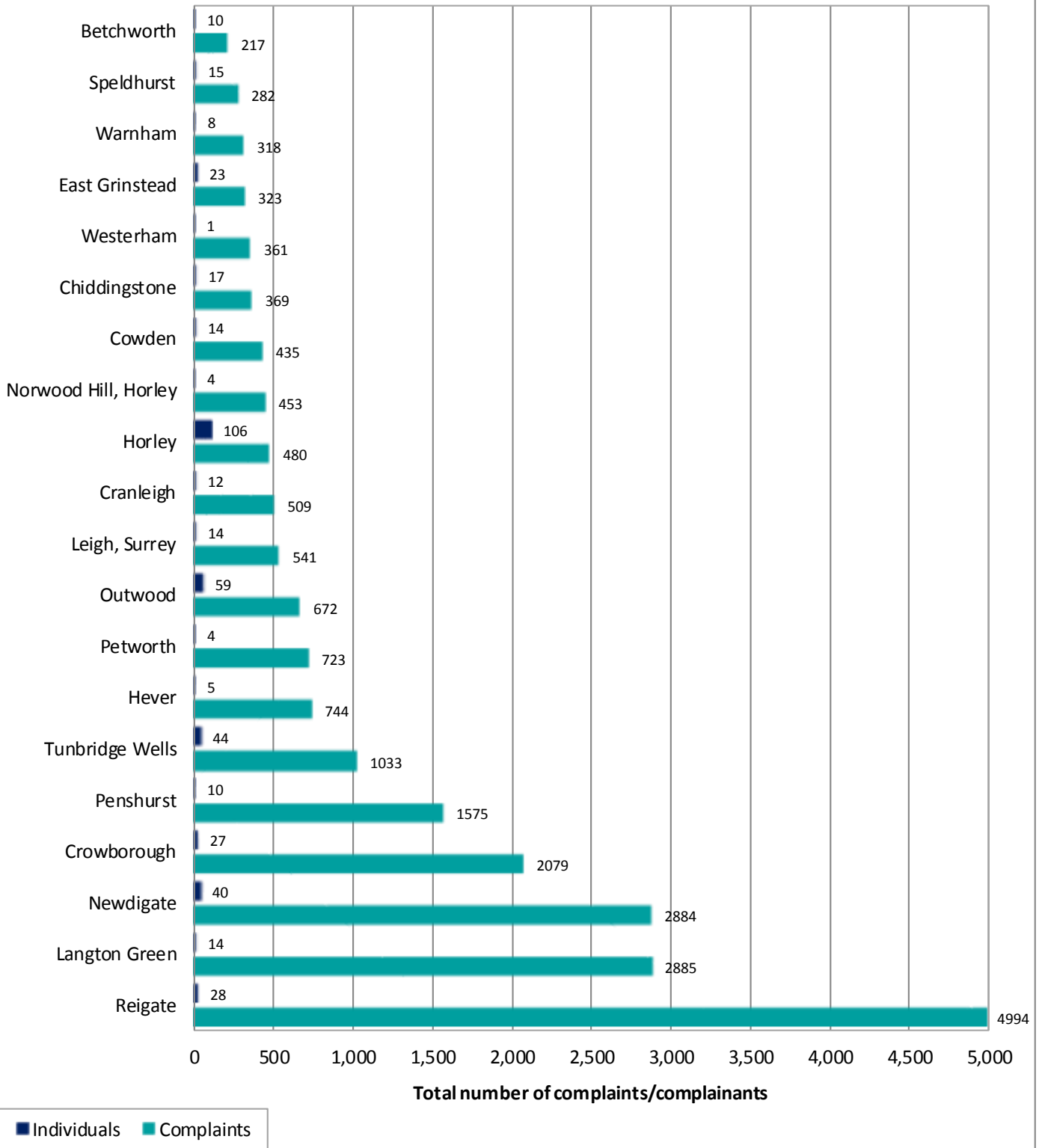


Figure 8: The Top 20 Locations for Complaints In 2017

Our Noise and Track Keeping System has the ability to can also automatically assign a specific aircraft noise complaint with a Gatwick Airport related air traffic movement and therefore enables the airport to provide statistics on the various stages of flight that are the cause for complaint.

The system also categorises the aircraft types that result in the majority of aircraft noise complaints as illustrated in the figure overleaf.

TYPE	TOTAL NO. MOVEMENTS	TOTAL COMPLAINTS	% OF MOVEMENTS PER TYPE	% COMPLAINTS PER TYPE
Airbus A320	94,363	2,876	33.00%	24.70%
Airbus A319	87,821	2,686	30.71%	23.07%
Boeing 737	47,074	1,995	16.46%	17.13%
Airbus A380	2,094	801	0.73%	6.88%
Boeing 747	3,159	632	1.10%	5.43%
Airbus A321	13,650	570	4.77%	4.89%
Boeing 777	8,232	563	2.88%	4.83%
Airbus A330	3,907	414	1.37%	3.56%
Boeing 757	6,433	190	2.25%	1.63%
Other Light Aircraft	241	175	0.08%	1.50%
Boeing 787	6,738	155	2.36%	1.33%
Boeing 767	2,170	152	0.76%	1.31%
Embraer	6,308	139	2.21%	1.19%
Helicopter	38	130	0.01%	1.12%
Airbus A310	440	44	0.15%	0.38%
Cessna Citation	168	42	0.06%	0.36%
ATR	1,362	20	0.48%	0.17%
Airbus A340	16	11	0.01%	0.09%
McDonnell Douglas	82	10	0.03%	0.09%
Airbus A350	618	9	0.22%	0.08%
Lockheed	6	9	0.00%	0.08%
Beechcraft Jet	16	8	0.01%	0.07%
Gulfstream	108	5	0.04%	0.04%
Dash 8 Prop	8	3	0.00%	0.03%
Airbus A318	15	2	0.01%	0.02%
Dassault Falcon	70	2	0.02%	0.02%
Canadair Regional Jet	28	1	0.01%	0.01%
Bombardier	766	1	0.27%	0.01%
Fokker 100	26	0	0.01%	0.00%

Figure 9: The Analysis of the Distribution of Complaints against Aircraft Types Compared to Total Movements 2017

Study of these figures would suggest that aircraft noise is not always the primary issue as it appears it is the frequency of the aircraft that provokes more complaints. The most common aircraft types operating at Gatwick receive the most complaints.

Figure 23 overleaf shows aircraft types classified by their comparable size and the percentage of complaints received per movement.

CLASS	TYPE	TOTAL NO. MOVEMENTS	TOTAL COMPLAINTS	% COMPLAINTS PER CLASS	% MOVEMENTS PER CLASS
Medium	Airbus A320	94,363	2,876	25.15%	33.07%
Medium	Airbus A319	87,821	2,686	23.49%	30.78%
Medium	Boeing 737	47,074	1,995	17.44%	16.50%
Large	Airbus A380	2,094	801	7.00%	0.73%
Large	Boeing 747	3,159	632	5.53%	1.11%
Medium	Airbus A321	13,650	570	4.98%	4.78%
Large	Boeing 777	8,232	563	4.92%	2.88%
Large	Airbus A330	3,907	414	3.62%	1.37%
Medium	Boeing 757	6,433	190	1.66%	2.25%
Small	Other light aircraft	241	175	1.53%	0.08%
Large	Boeing 787	6,738	155	1.36%	2.36%
Large	Boeing 767	2,170	152	1.33%	0.76%
Small	Embraer	6,308	139	1.22%	2.21%
Small	Cessna Citation	168	42	0.37%	0.06%
Small	ATR	1,362	20	0.17%	0.48%
Small	McDonnell Douglas	82	10	0.09%	0.03%
Large	Airbus A350	618	9	0.08%	0.22%
Small	Gulfstream	108	5	0.04%	0.04%
Small	Dassault Falcon	70	2	0.02%	0.02%
Medium	Bombardier	766	1	0.01%	0.27%

Figure 10: The Analysis of Complaints against Aircraft Type by Comparative Size 2017

This figure also confirms that there are more complaints for the more common aircraft types at Gatwick Airport rather than related to the size of the aircraft. The aircraft with the greatest numbers of movements are classed as medium sized aircraft and these appear to have the greatest number of complaints.

We should point out that helicopters are also a source of complaint, however very few operate from Gatwick, and all of our complaints on this subject relate to either police/air ambulance flights from Redhill Aerodrome or military flights.

Gatwick Airport remains dedicated to reducing the noise impact of its operations on local communities. In line with current Government guidance, we are actively looking at new innovative ways of reducing the number of people impacted by Gatwick traffic.

To this end, we will continue to work with our airlines, Air Traffic Control and local community representatives to continue to improve the noise environment in and around the airport.

Complaint location maps are included in Annex 7 – General Maps.

ANNEX 6 – SUMMARY OF LIMIT VALUES IN PLACE

LOCAL AUTHORITY PLANNING CONDITIONS

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

The contours below have been calculated using data recorded between March 2015 and March 2016 (a full summer and winter season as described in the current night restrictions regime). The areas, population and household data are also provided for each contour level, on a cumulative basis, in accordance with normal practice. Night Movement and Quota Count Restrictions between 23:00 and 06:00 local.

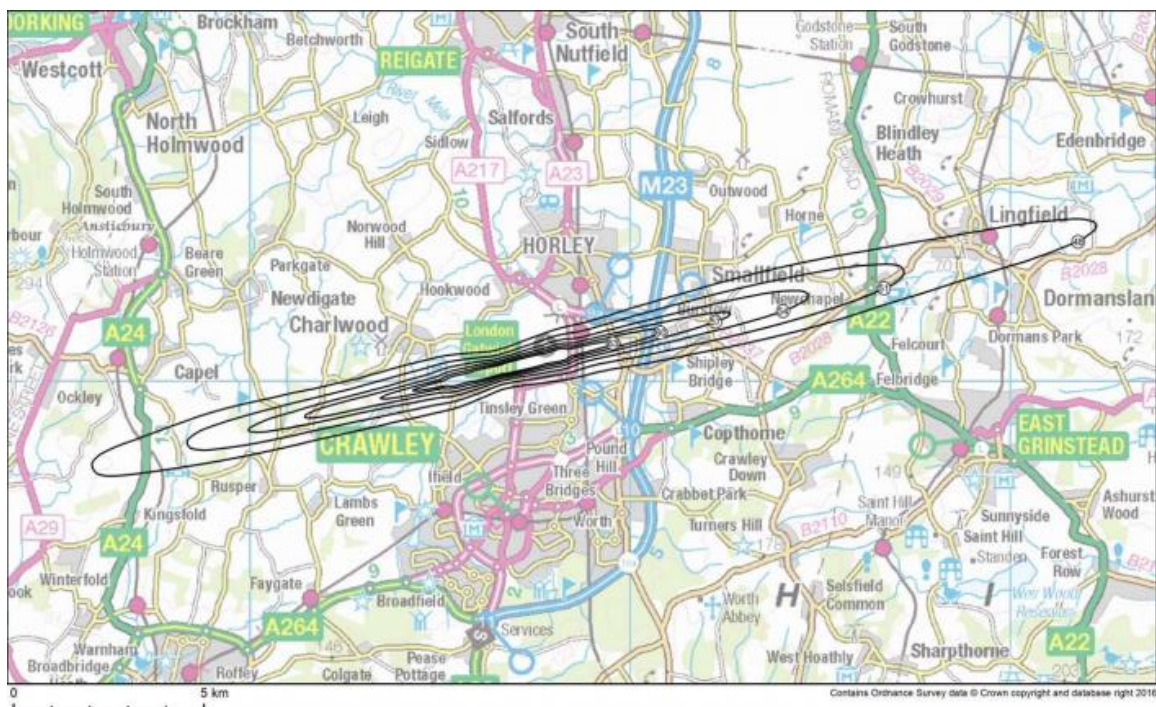


Figure 11: Gatwick Summer 2015 and Winter 2016/17 L_{Aeq} 6.5 hr night contours and supporting population/household count.¹

Gatwick 2015-16 L_{Aeq} 6.5hr night (actual usage)			
Contour (dBA)	Area (sq km)	Population (1000s)	Households (1000s)
48	35.2	4.3	1.6
51	18.0	1.3	0.5
54	9.0	0.5	0.1
57	4.6	0.3	0.1
60	2.3	0.1	<0.1
63	1.2	0.0	0.0

¹ Department for Transport Night Flight Restrictions at Heathrow, Stansted and Gatwick Consultation Document

NIGHT QUOTA COUNT AND AIR TRAFFIC MOVEMENTS LIMITS

Figure 12: Historic and current Night Quota and air traffic movement limits for the summer and winter

WINTER	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Movements limits	3,250	3,250	3,250	3,250	3,250	3,250	3,250	3,250
Quota points	2,060	2,000	2,000	2,000	2,000	2,000	2,000	2,000

SUMMER	2010	2011	2012	2013	2014	2015	2016	2017
Movements limits	11,200	11,200	11,200	11,200	11,200	11,200	11,200	11,200
Quota points	6,400	6,300	6,200	6,200	6,200	6,200	6,200	6,200

The Night flying restrictions at Gatwick Airport are set by the Department for Transport, with the current restrictions due to expire in October 2017. The Government published its decision on the next night flights regime for Gatwick in July 2017 and this will be in place for the period October 2017 to October 2022.

The movements limit remains unchanged however the night quota limit will be reduced. This is summarised in the table below:

Figure 13: The DfT's new night flight regime limits

WINTER	2017/18	2018/19 TO 2021/2022
Movements limits	3,250	3,250
Quota points	2,000	1,785

SUMMER	2018	2022
Movements limits	11,200	11,200
Quota points	6,200	5,150

In addition, a new quota count of 0.125 has been introduced for aircraft with an EPNdB of between 81 and 83.9. The combination of the new limits and this new QC category will further incentivise the use of quieter aircraft by encouraging industry to plan its operations with sufficient headroom to ensure the limits can still be complied with in the event of unplanned disruption or changes to their schedules.

DEPARTURE NOISE LIMITS FROM THE UK AIP

The noise abatement procedures contained within the UK AIP (see Section 7):

- Daytime (07:00-23:00) departure noise limit of 94dB(A) L_{max} at 6.5km from start of roll.
- Night Shoulder (23:00-23:30 & 06:00-07:00) departure noise limit of 89dB(A) L_{max} at 6.5km from start of roll.
- Night (23:30-06:00) departure noise limit of 87dB(A) L_{max} at 6.5km from start of roll.

ANNEX 7 – GENERAL MAPS

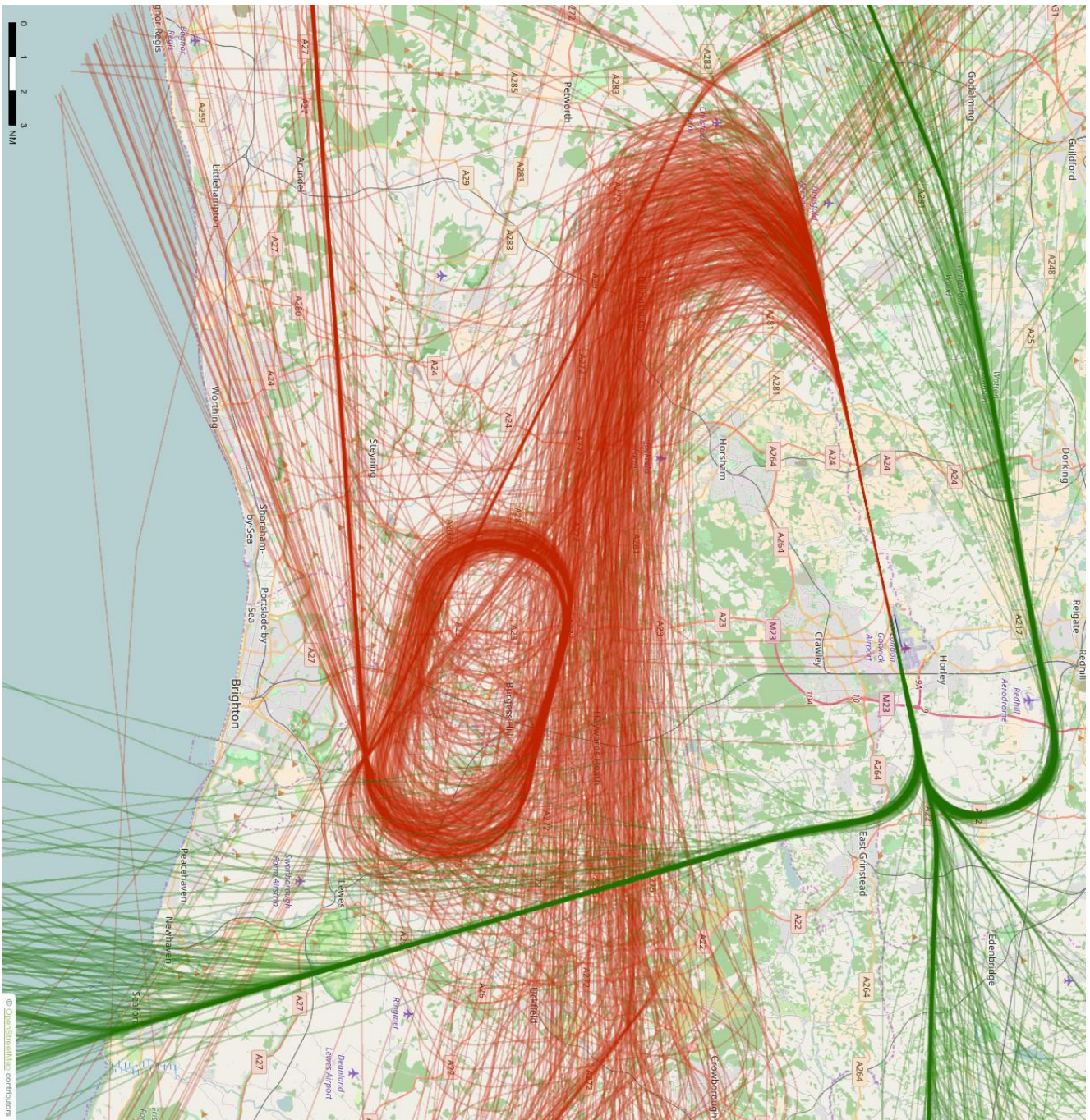


Figure 14: 24 Hour Period Of Easterly Operations (Runway 08R) Illustrating Arriving Aircraft (Red Tracks) and Departing Aircraft (Green Tracks) Only

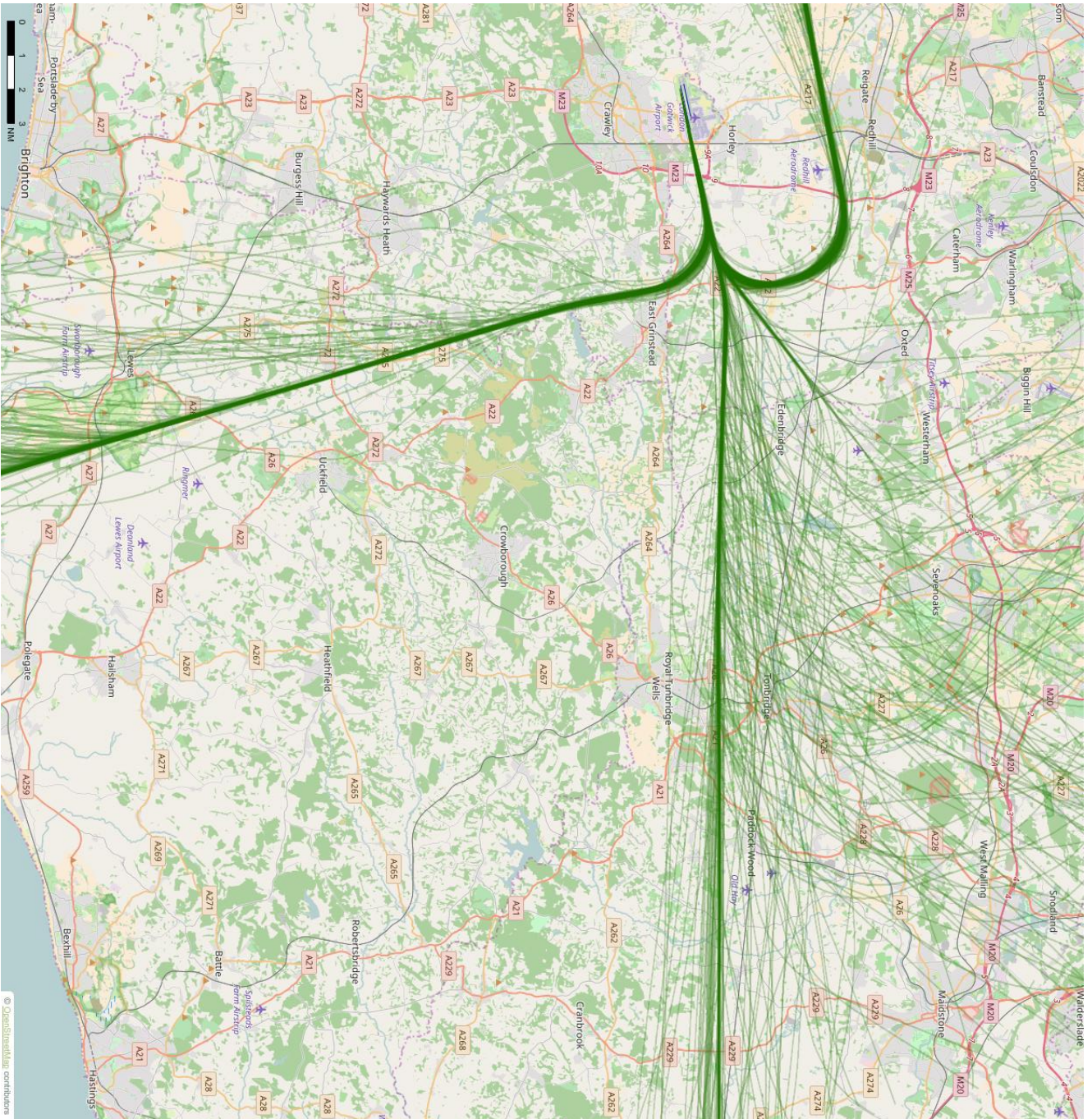


Figure 15: 24 Hour Period Of Easterly Operations (Runway 08R) Showing Departures Only – Map 1 of 2

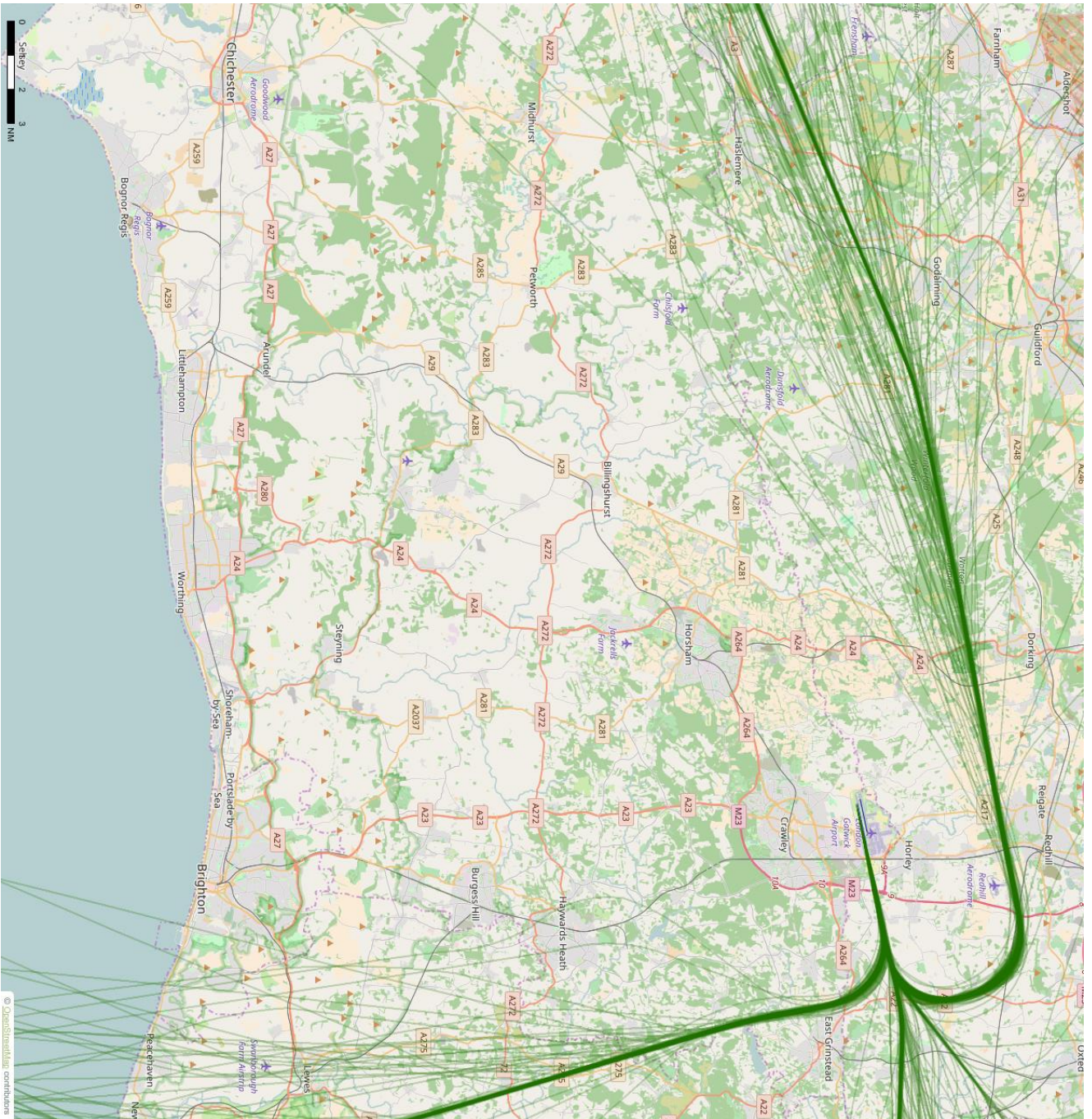


Figure 16: 24 Hour Period Of Easterly Operations (Runway 08R) Showing Departures Only – Map 2 of 2

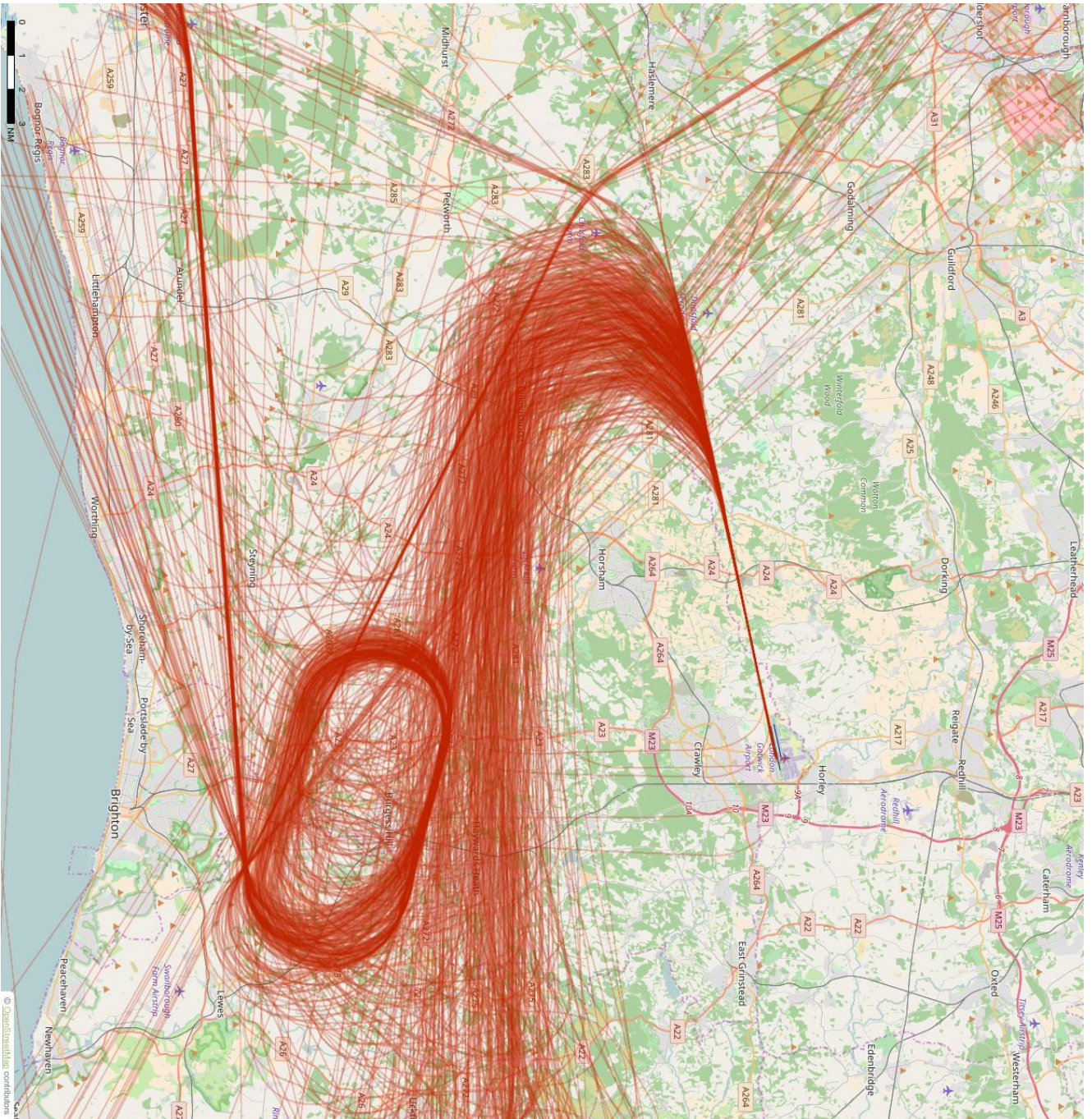


Figure 17: 24 Hour Period Of Easterly Operations (Runway 08R) Showing Arrivals Only - Map 1 of 2

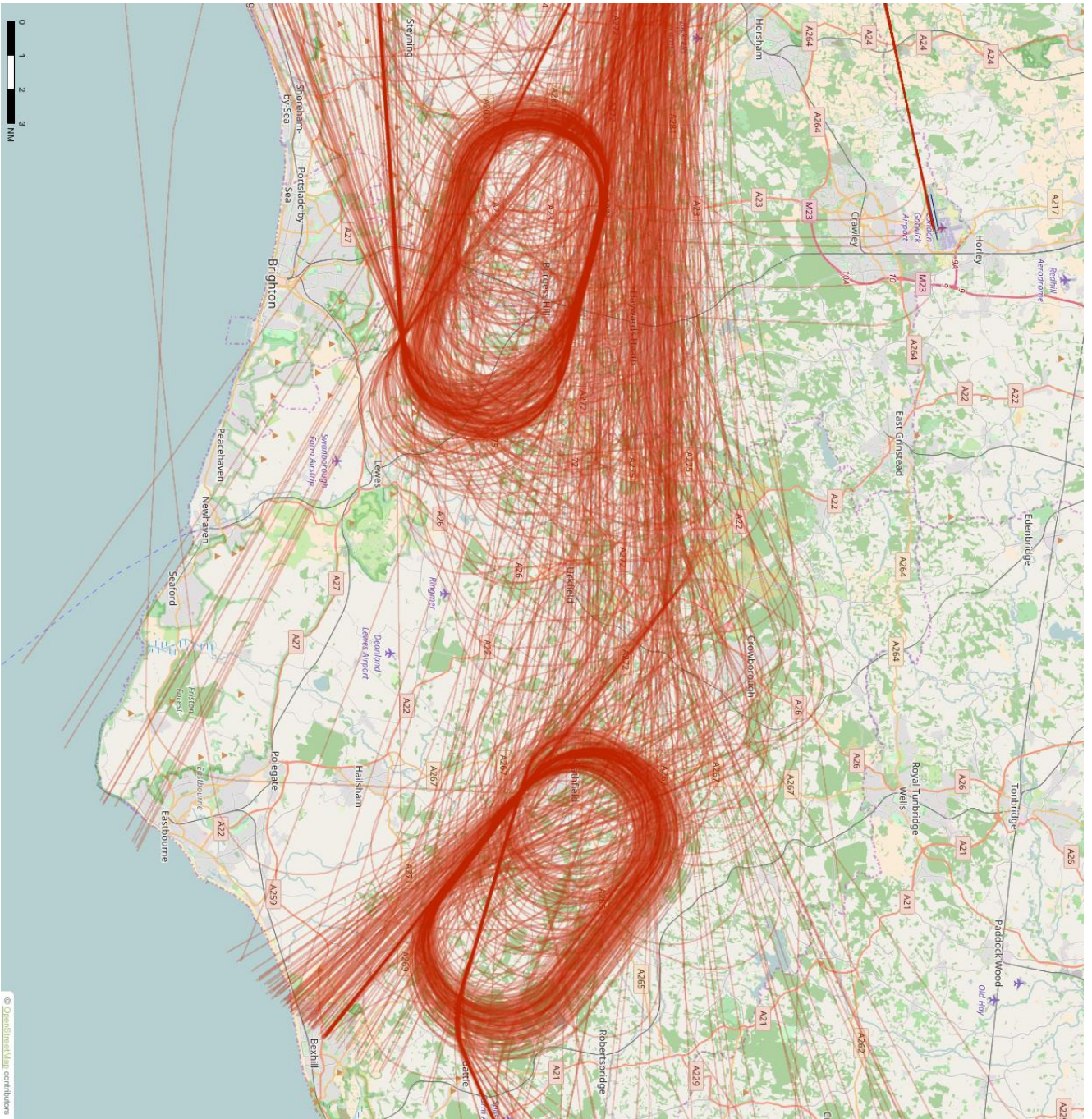


Figure 18: 24 Hour Period Of Easterly Operations (Runway 08R) Showing Arrivals Only - Map 2 of 2

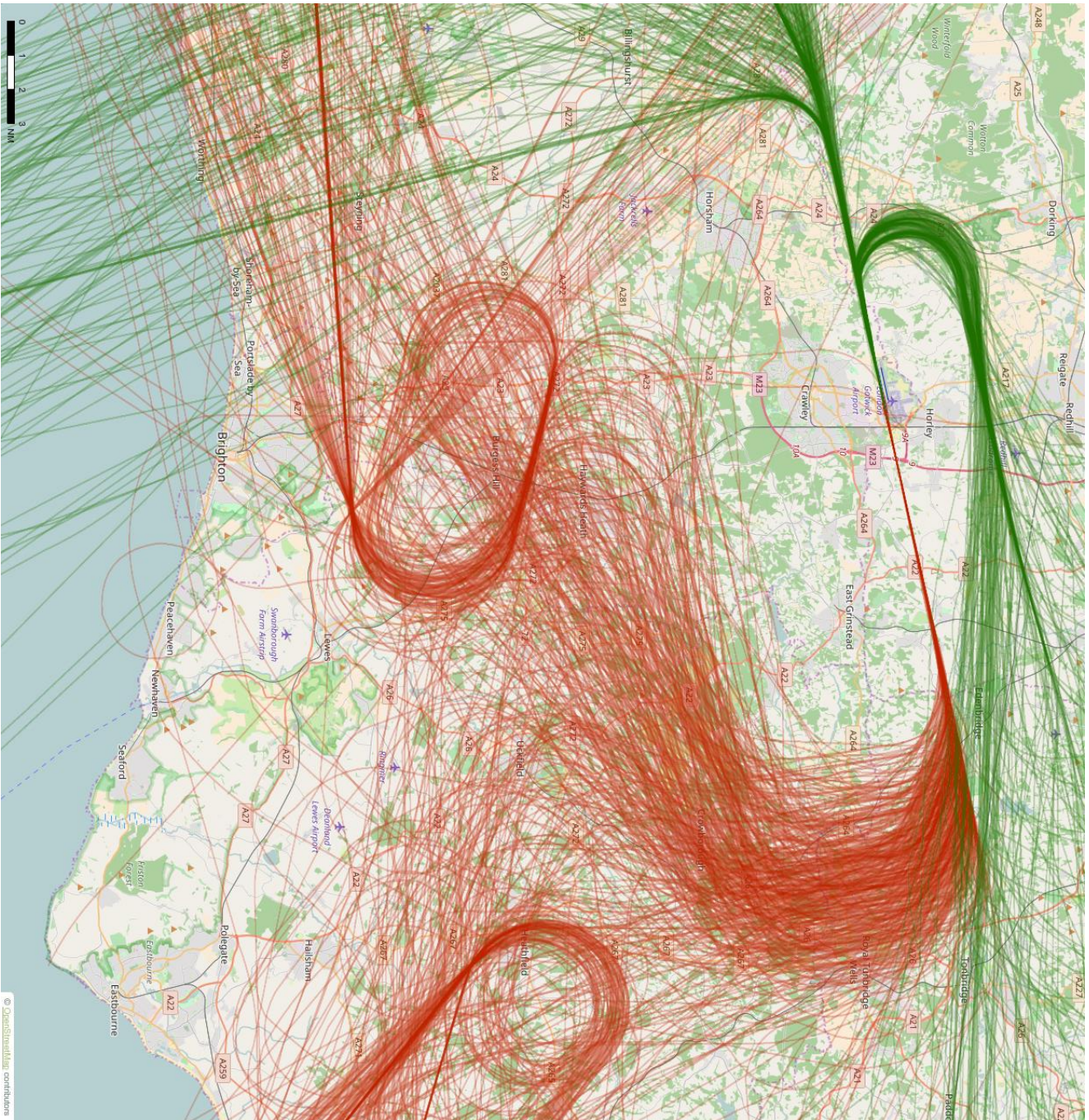


Figure 19: 24 Hour Period Of Westerly Operations (Runway 26L) Illustrating Arriving Aircraft (Red Tracks) and Departing Aircraft (Green Tracks) Only

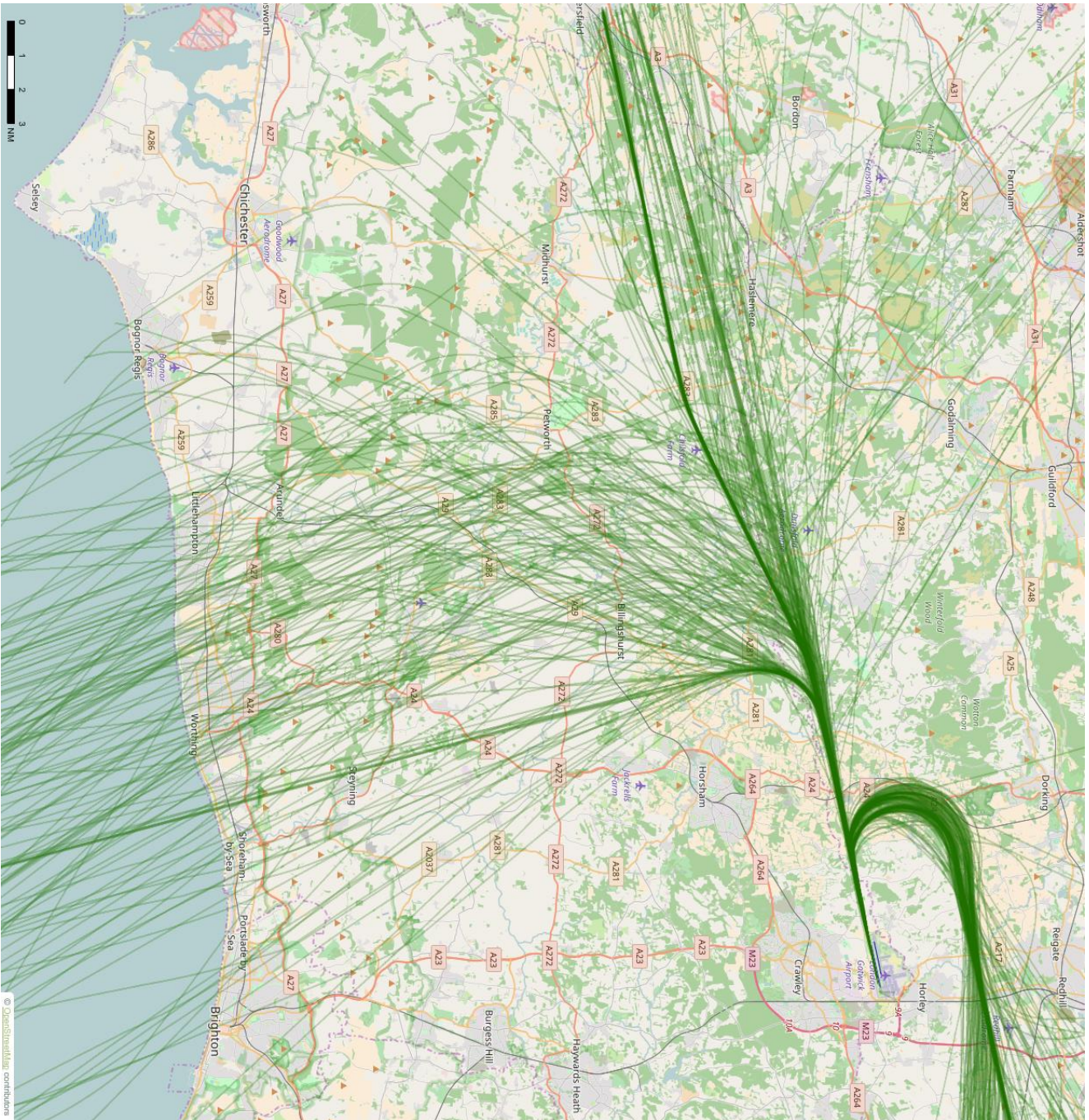


Figure 20: 24 Hour Period Of Westerly Operations (Runway 26L) Showing Departures Only – Map 1 of 2

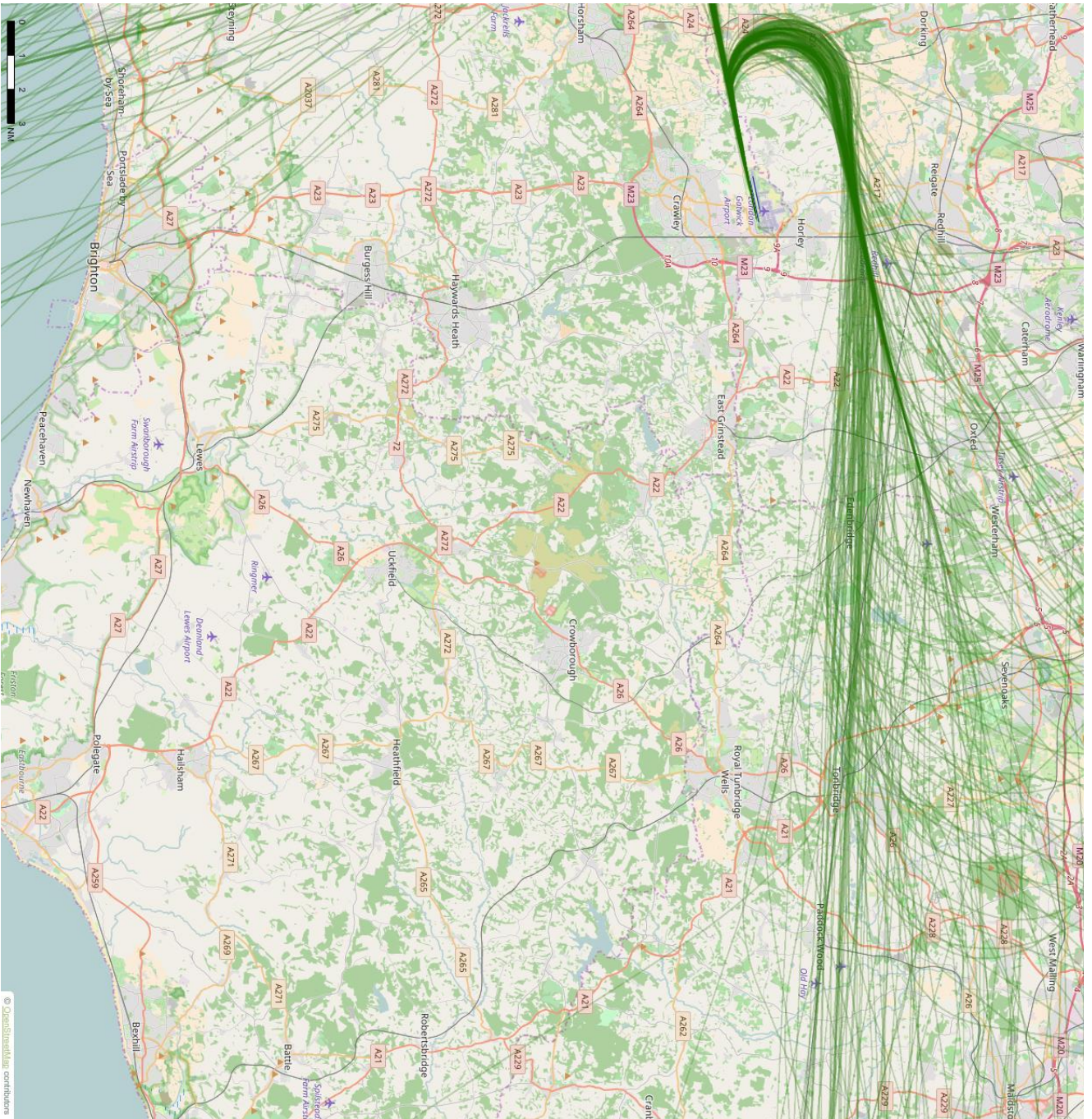


Figure 21: 24 Hour Period Of Westerly Operations (Runway 26L) Showing Departures Only – Map 2 of 2

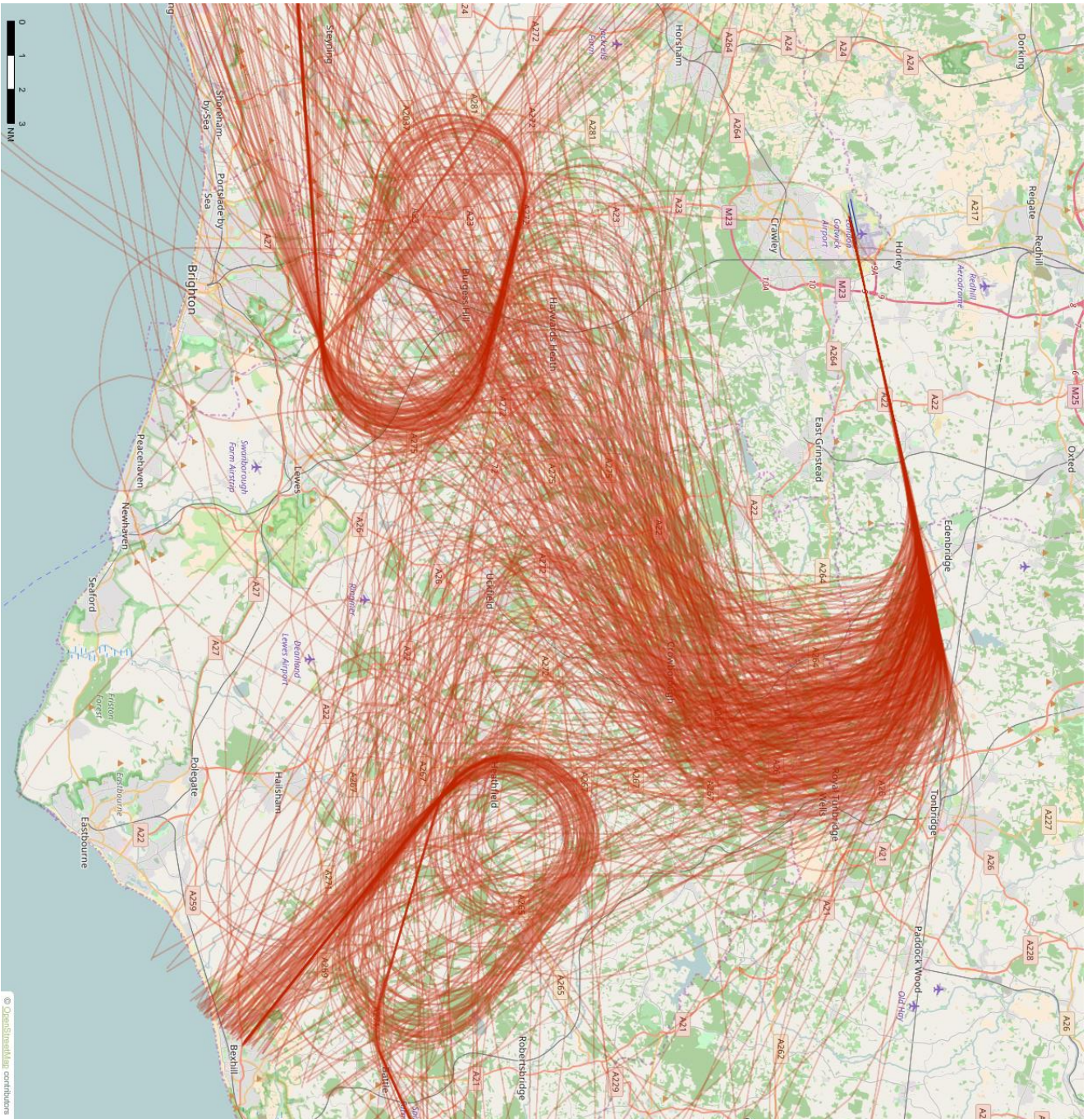


Figure 22: 24 Hour Period Of Westerly Operations (Runway 26L) Showing Arrivals Only – Map 1 of 2

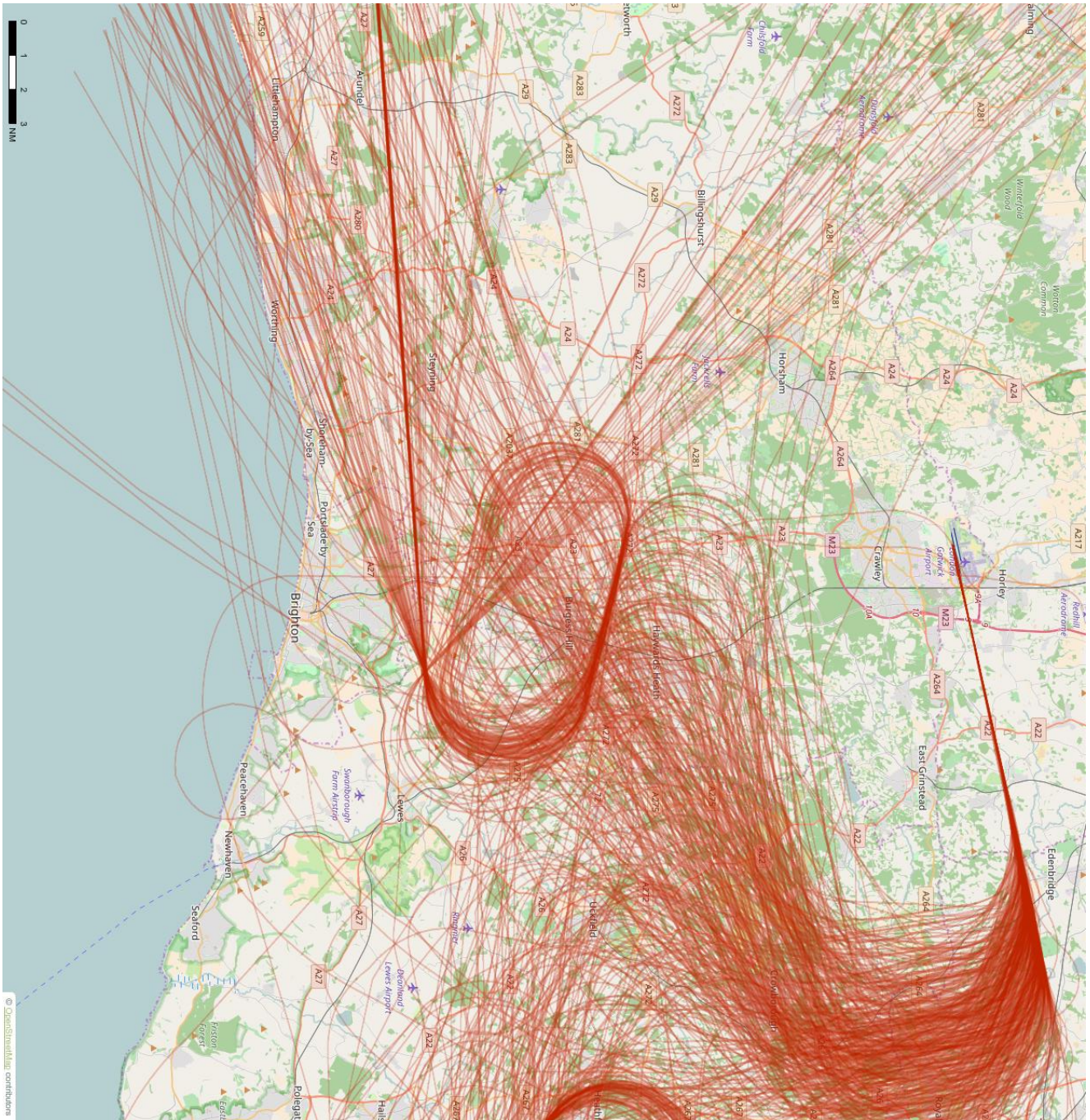
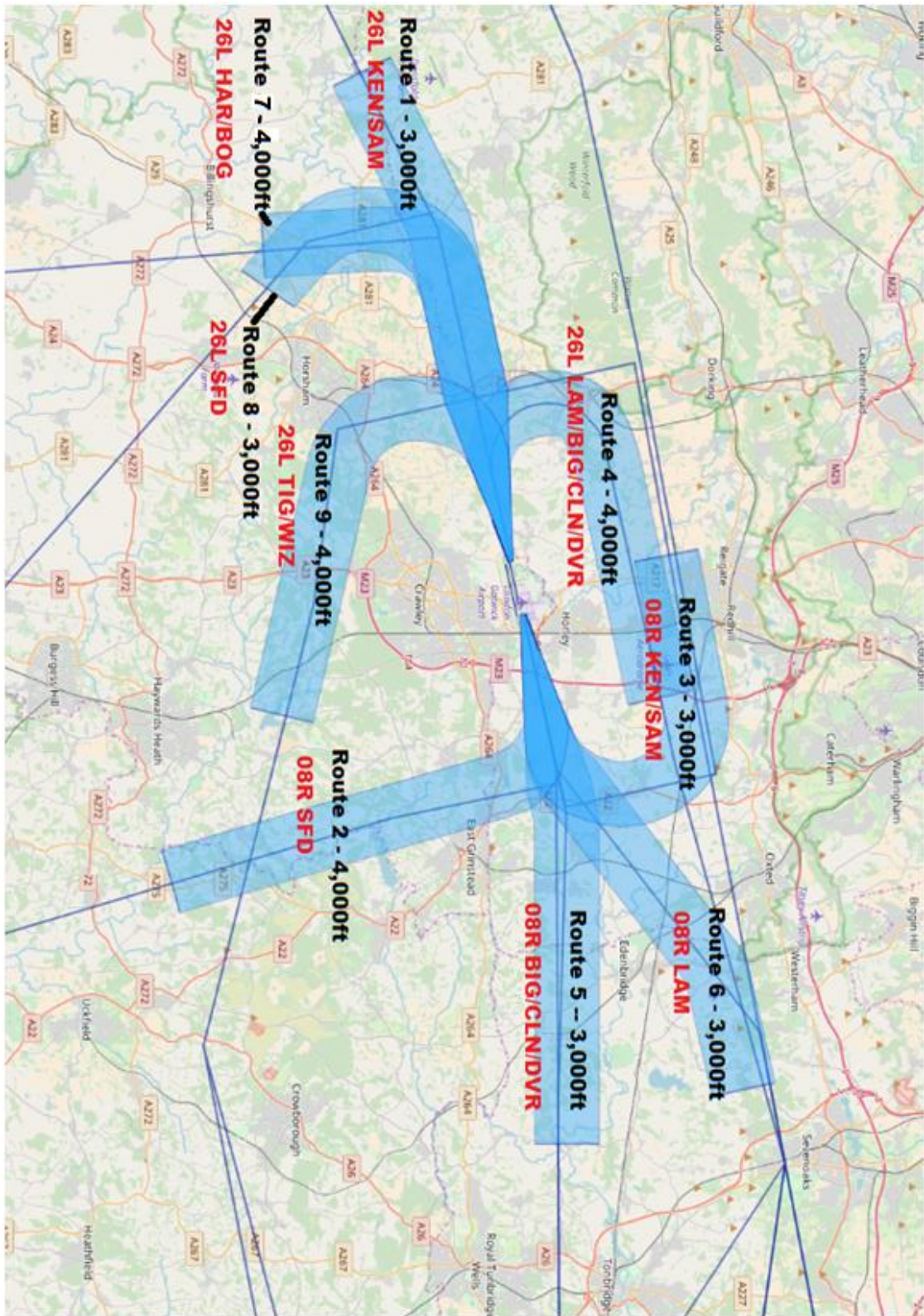


Figure 23: 24 Hour Period Of Westerly Operations (Runway 26L) Showing Arrivals Only – Map 2 of 2

Figure 24: Map Illustrating the Location of the Noise Preferential Routes, the associated Standard Instrument Departure route and the vectoring altitude at London Gatwick



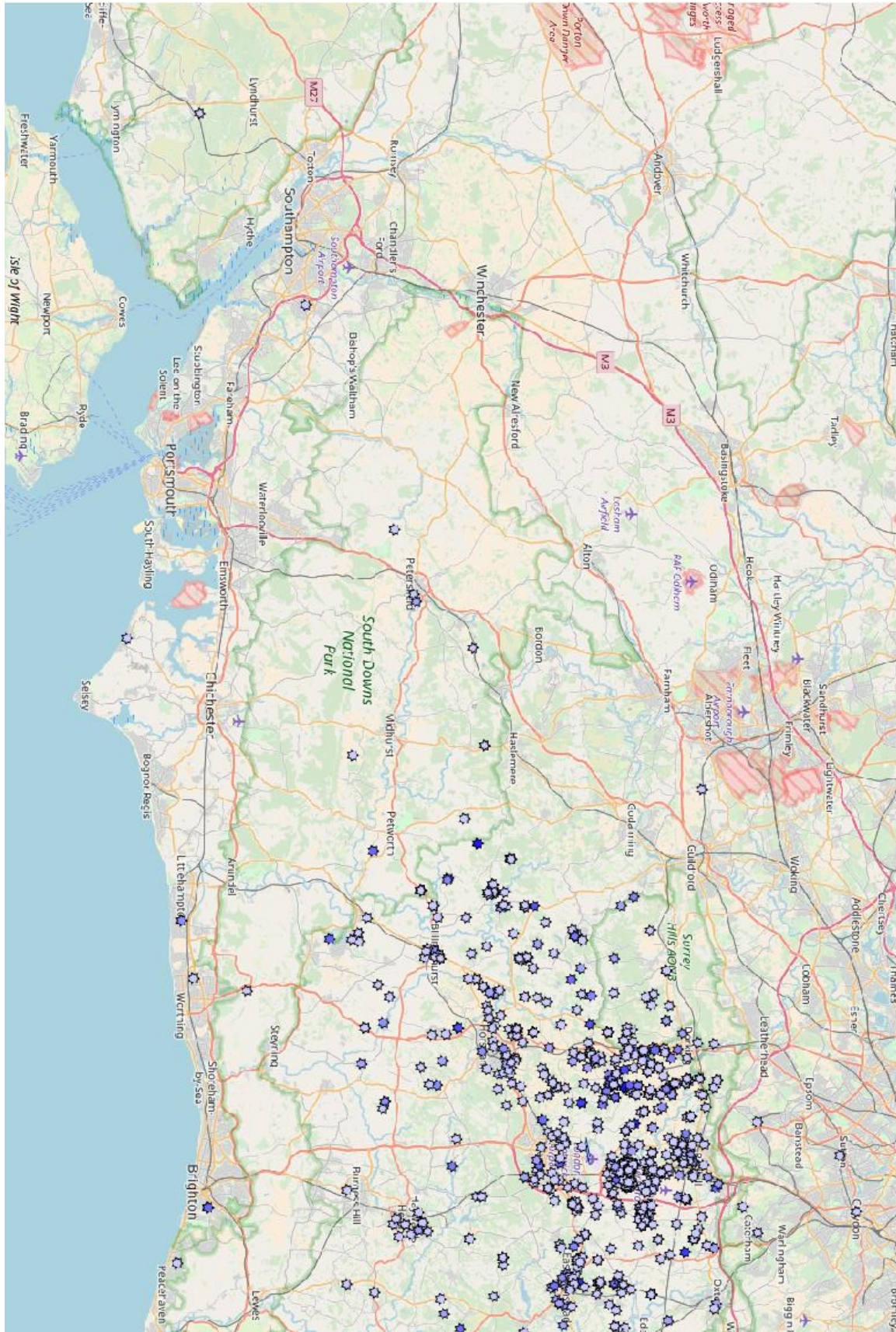


Figure 25: Map Illustrating the Postcode Location of Aircraft Noise Complaints Received for the Period 1 January 2017 to 31 December 2017 - Map 1 of 4

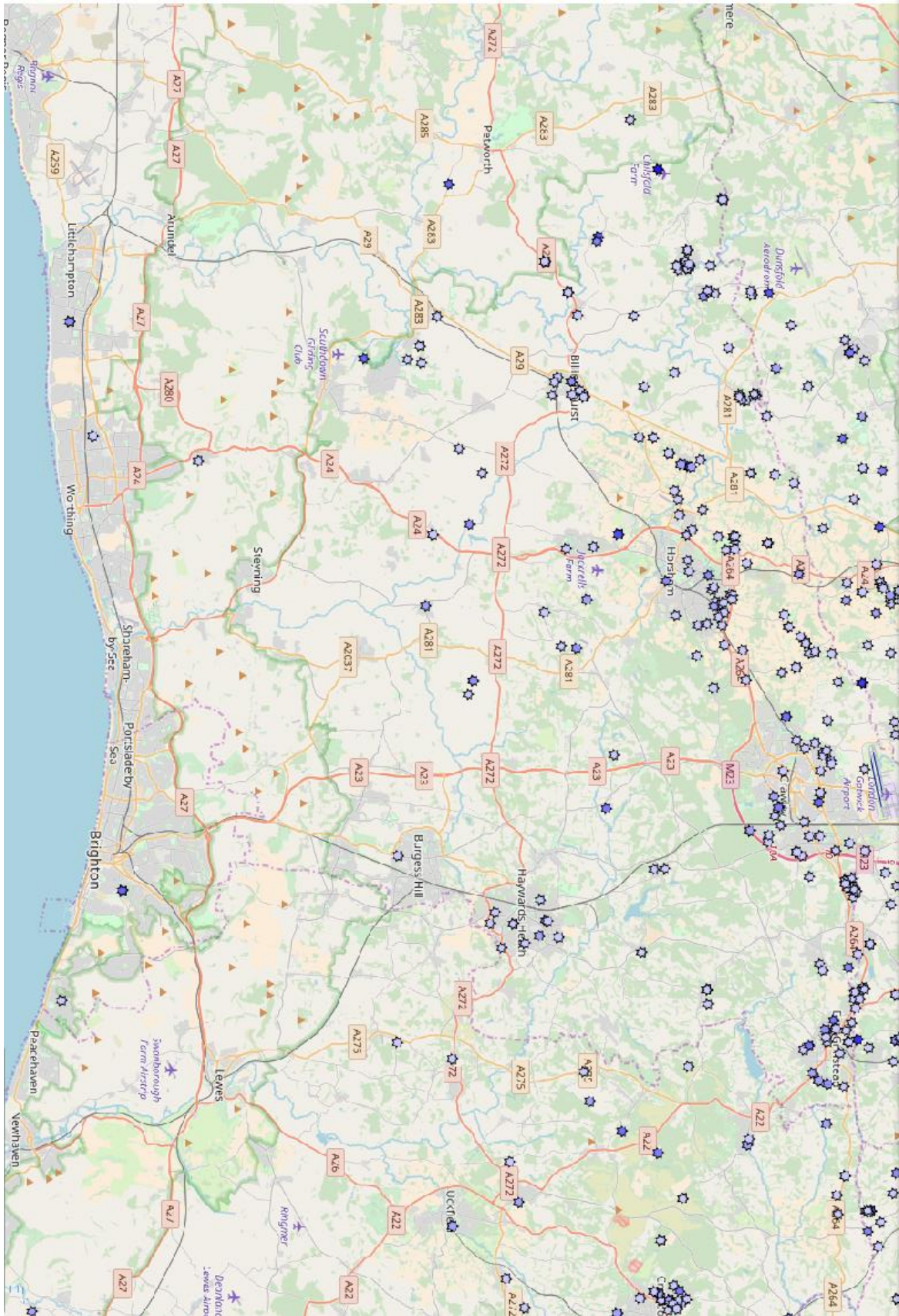


Figure 26: Map Illustrating the Postcode Location of Aircraft Noise Complaints Received for the Period 1 January 2017 to 31 December 2017 - Map 2 of 4

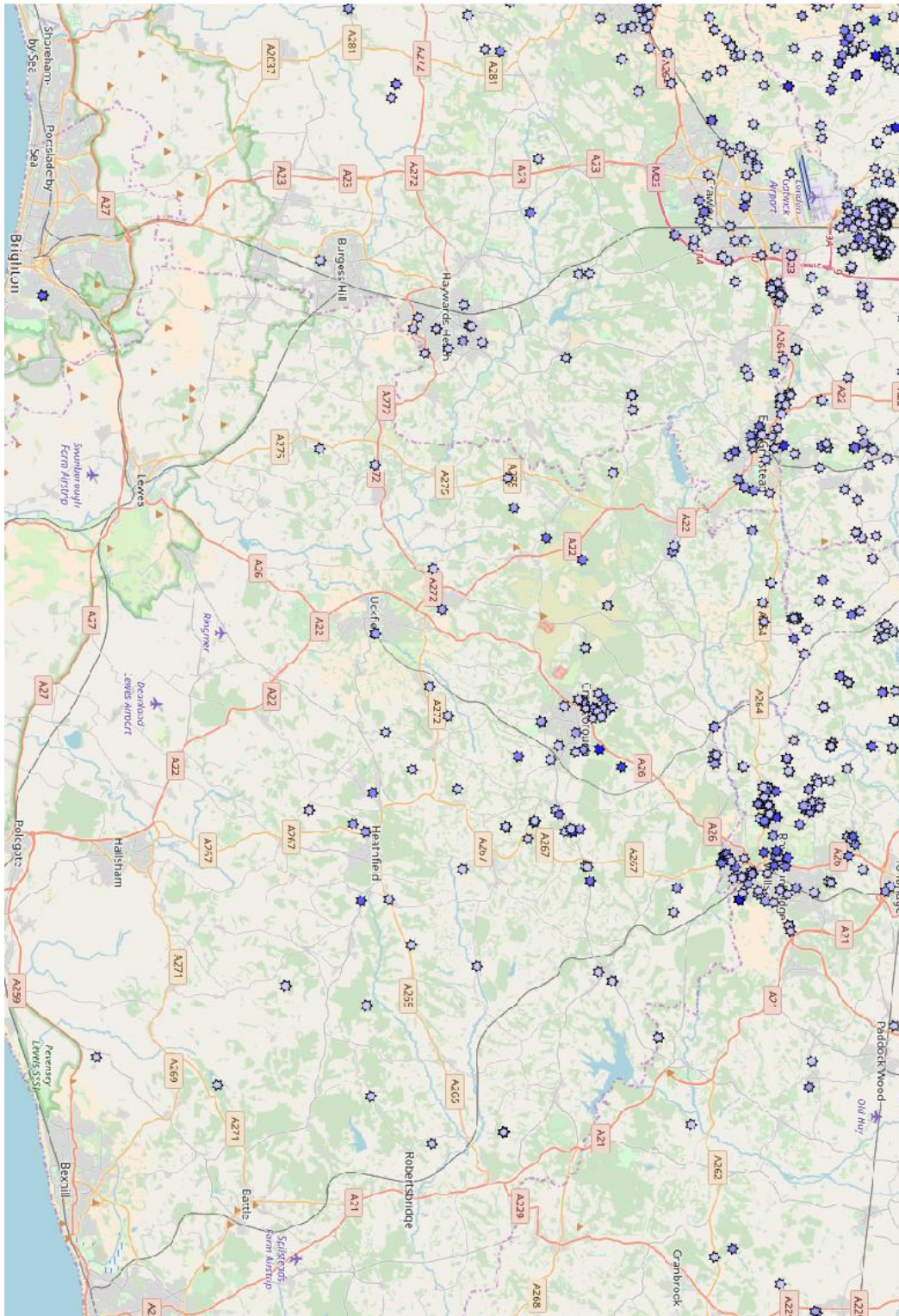


Figure 27: Map Illustrating the Postcode Location of Aircraft Noise Complaints Received for the Period 1 January 2017 to 31 December 2017 - Map 3 of 4

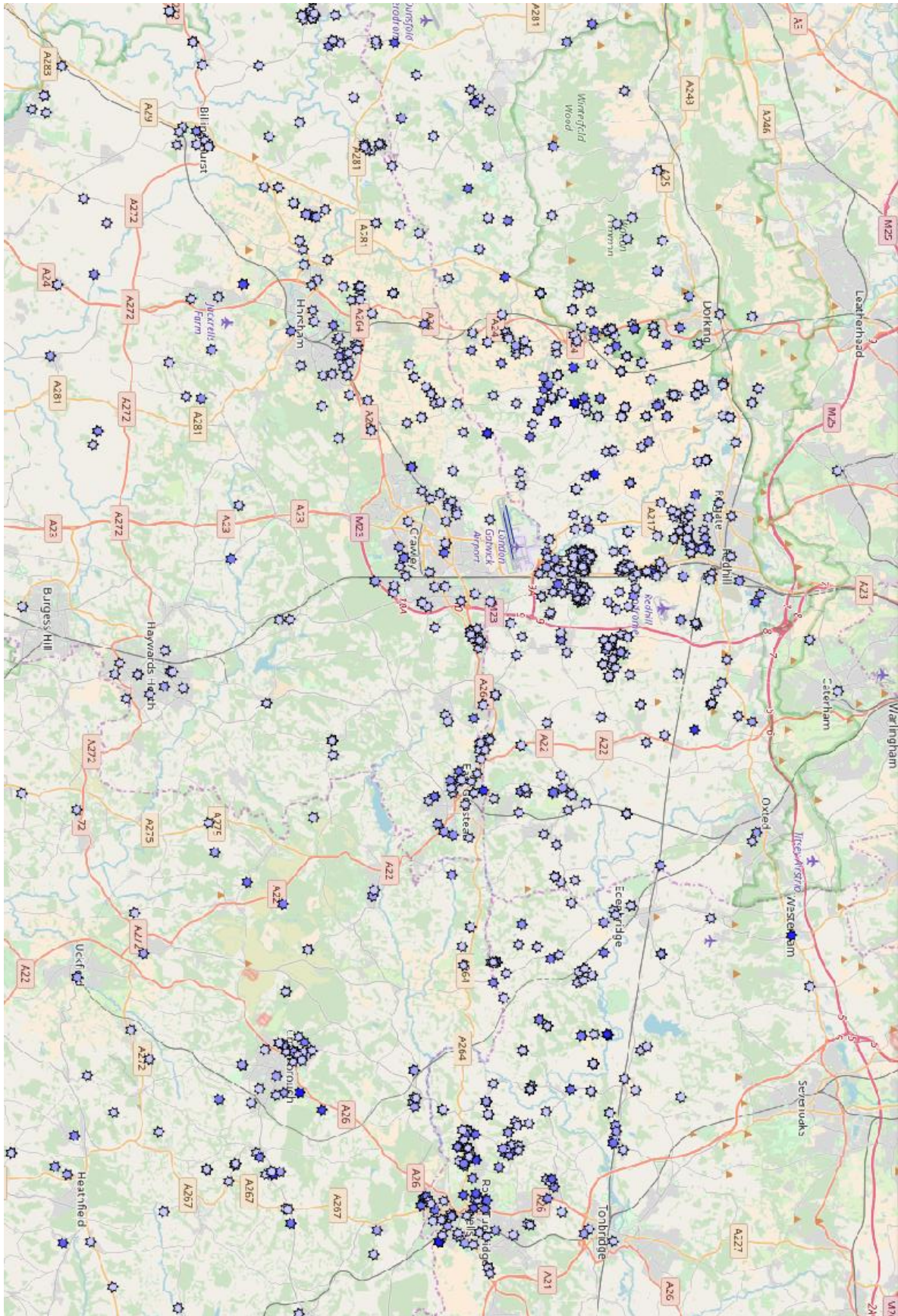


Figure 28: Map Illustrating the Postcode Location of Aircraft Noise Complaints Received for the 1 January 2017 to 31 December 2017 - Map 4 of 4

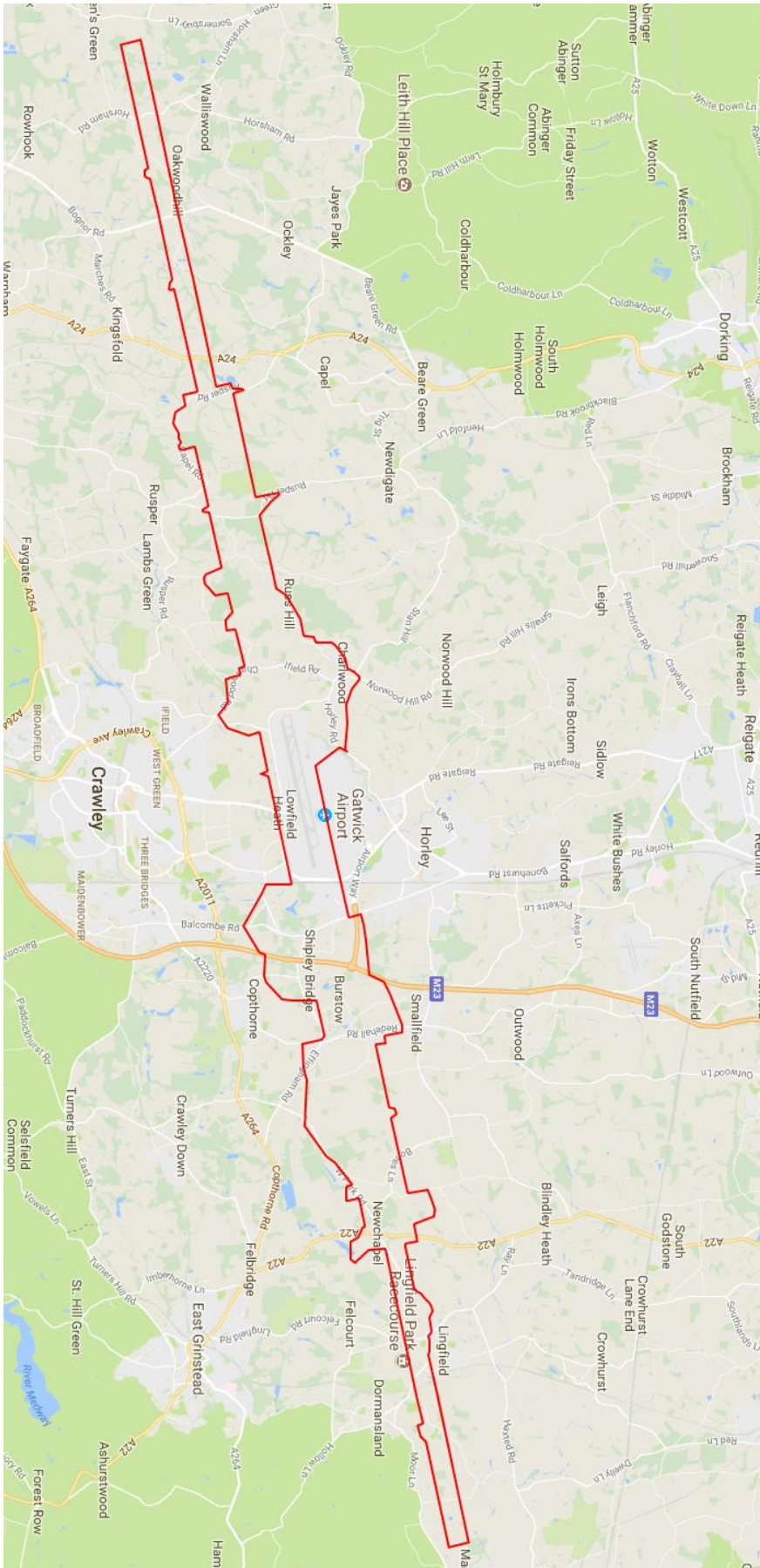


Figure 29: Map Illustrating the Boundary of the Gatwick Airport Noise Insulation Scheme

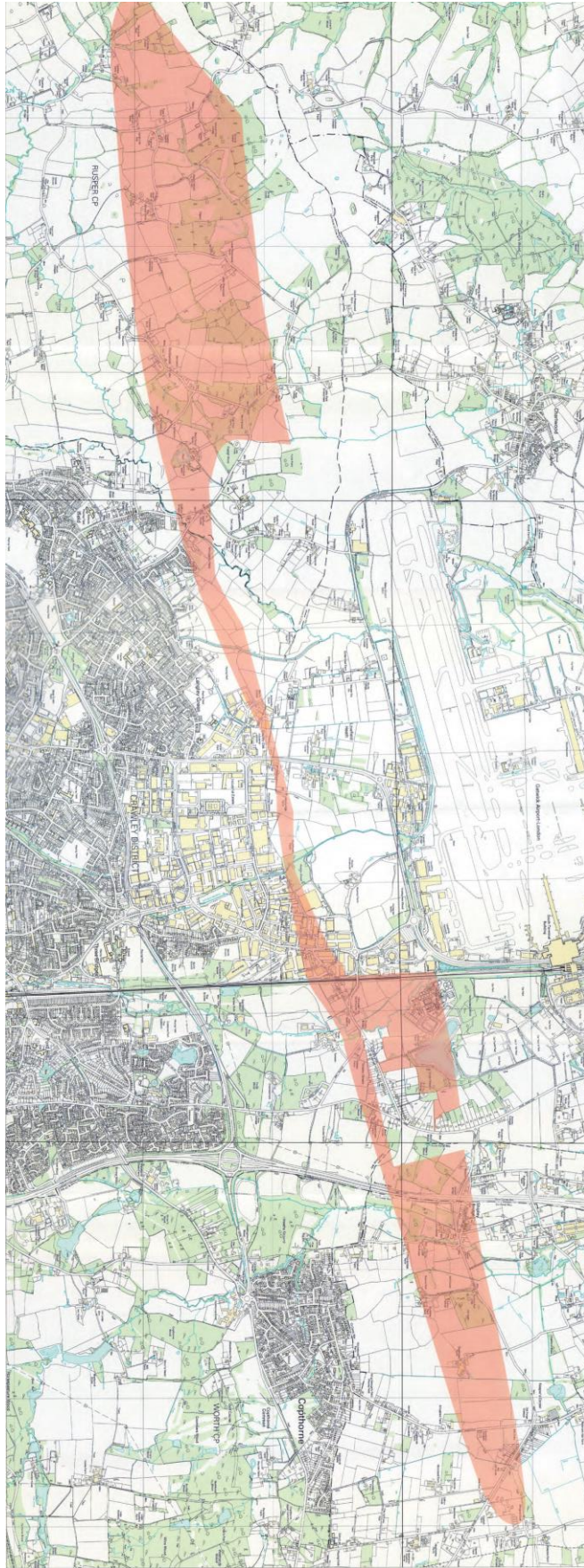


Figure 30: Gatwick Airport Ltd Home Owner Support Scheme Boundary

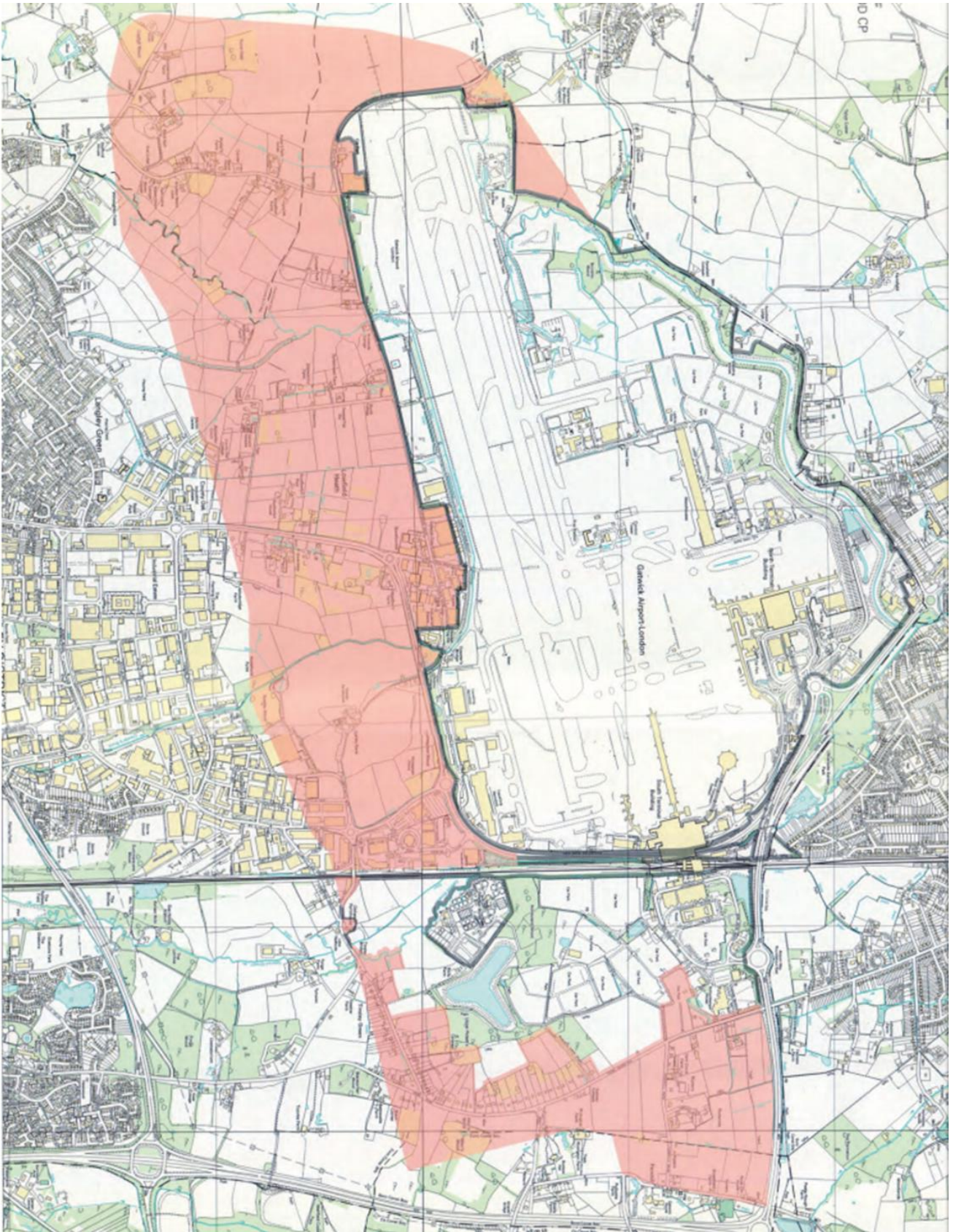


Figure 31: Gatwick Airport Ltd Property Market Support Bond Scheme Boundary

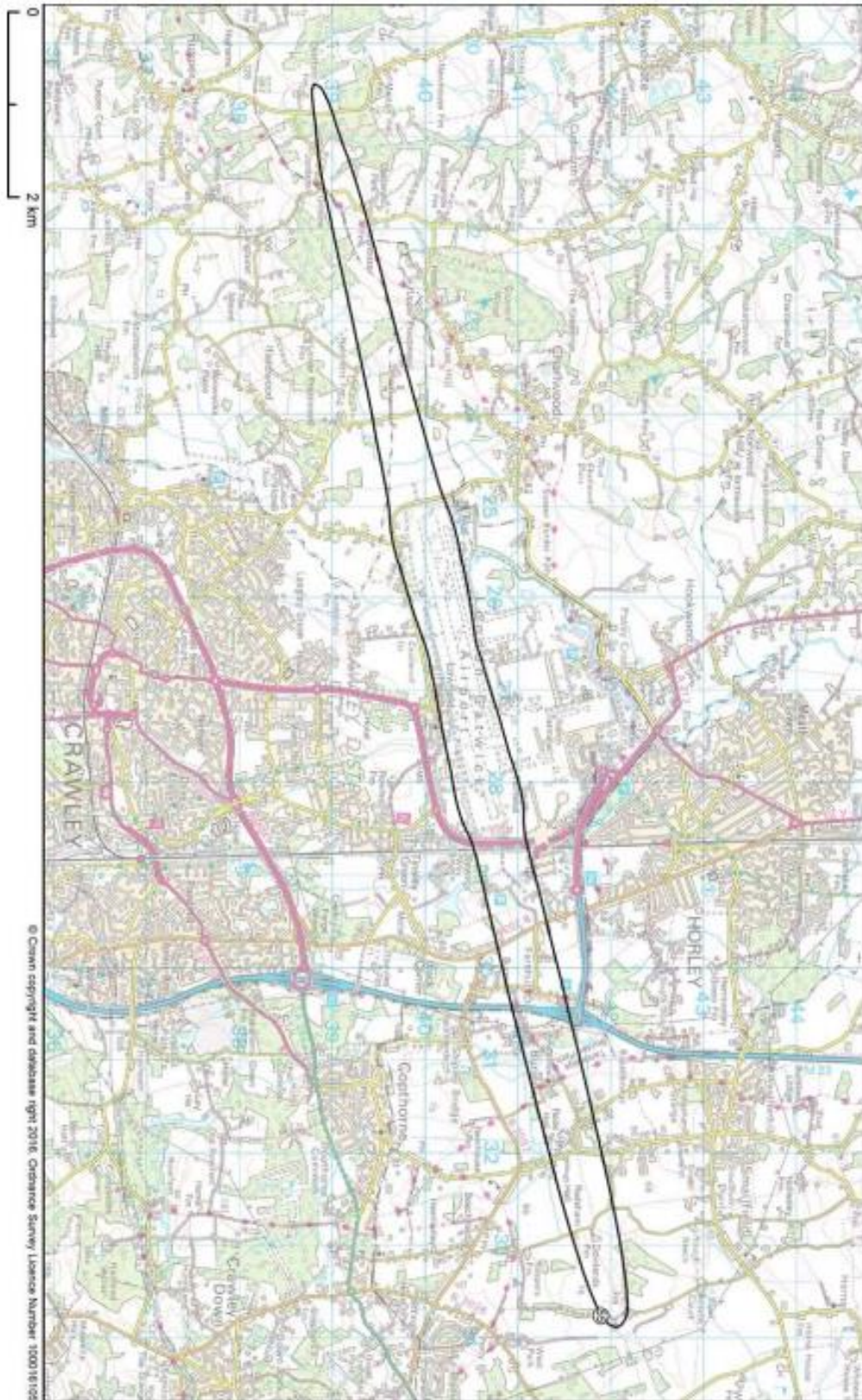


Figure 32: Gatwick Summer 2015/Winter 2015-16 LAeq 6.5hr Night 55dBa Contour

ANNEX 8 – FINANCIAL INFORMATION

Figure 33: Estimated current financial cost to Gatwick Airport Ltd of noise management

TYPE	DESCRIPTION	APPROXIMATE ANNUAL COST
Noise insulation and mitigation schemes	Acoustic insulation, relocation scheme, insulation of noise sensitive community buildings and vortex strike scheme.	£950k (varies)
Staff costs	Salaries for staff engaged with noise and airspace related activities.	£850k
Airspace change costs	Costs associated with airspace change activities including LAMP, introducing R-NAV1 SIDs etc.	£710k (varies)
Noise Management Board	Management and maintenance of the board	£550k
	NMB airspace initiatives	£600k
	Independent technical support for the Community Noise Groups.	£40k
Noise and Track Keeping system costs	Software licences, development support and maintenance of noise monitoring equipment.	£300k
Section 106 Costs	Annual S.106 payments.	£206k
Research and Consultancy	Research activities and consultancy associated with Section 106 verification, Decade of change verification.	£150k
Publications and communications	Seminars, venue hire, noise related publications, documents and maintenance of the airspace and noise website.	£100k
Noise Contours	Fees for the development of the annual noise contours.	£25k
Community Noise Reports	Independent reporting and studies.	£15k
Freepost costs	Freepost licence and postage costs incurred.	£7k
Fines	Departure noise limits and track-keeping.	£1.5k (varies)*

SOURCE – GATWICK AIRPORT LTD

*Cost charged to the aircraft operator concerned and monies forwarded to the Gatwick Airport Community Trust.

ANNEX 9A – FEEDBACK RECEIVED REGARDING THE PROPOSED LIST OF ACTION PLAN ACTIONS DURING THE FIRST ROUND OF ENGAGEMENT, INCLUDING GATWICK AIRPORT LTD RESPONSE

Feedback on the list of draft Action Plan Actions was received from the following organisations:

- Crawley Borough Council;
- Horsham District Council;
- Reigate and Banstead Borough Council;
- Surrey County Council;
- West Sussex County Council;
- The Gatwick Airport Consultative Committee (GATCOM), including:
 - Report from the Secretariat and Technical Advisor to the GATCOM Steering Group dated 4 January 2018;
 - Final Response dated 2 February 2018.

In addition, a letter dated 15 December 2017 from the Noise Management Board Community Noise Groups and the Gatwick Area Conservation Campaign was received setting out their collective view on the draft Action Plan Actions and issues relating to the interpretation and implementation of Government Policy. A document containing further feedback was received on 16 February 2018.

The following pages include details of feedback received and also suggested Action Plan Actions to be included and the Gatwick Airport Ltd response is underneath each item in blue text.

KEY THEMES IN THE FEEDBACK RECEIVED

1. The link between noise and the adverse impacts on health is becoming ever stronger.

GATWICK AIRPORT RESPONSE

This is acknowledged, a recent study (*Aircraft noise and cardiovascular disease near Heathrow Airport in London: small study area. Hansell et al (2013); British Medical Journal, 347, f5432*) around London Heathrow Airport examined risks for hospital admission and mortality for stroke, coronary heart disease and cardiovascular disease for around 3.6 million people living near London Heathrow airport. Both daytime ($L_{Aeq,16h}$) and night-time (L_{night}) aircraft noise exposure were related to increased risk for a cardiovascular hospital admission. Compared to those exposed to aircraft noise levels below 51 dB in the daytime, those exposed to aircraft noise levels over 63dB in the daytime had the following higher chance of a hospital admission:

- 24% for a stroke,
- 21% for coronary heart disease,
- 14% for cardiovascular disease.

Similar effects were also found between aircraft noise exposure and mortality for stroke, coronary heart disease and cardiovascular disease.

2. An acknowledgement of the extensive range of noise management activity undertaken by Gatwick Airport Ltd to date and further activities proposed for the coming five years. However, it must be recognised that residents remain affected by increasing absolute levels of noise, arising from a net increase in aircraft movements which has offset many of the technological and operational improvements. In response to this, the action plan should give residents confidence that Gatwick Airport Ltd is committed to sharing benefits of noise management progress, in the sense of an outcome of absolute noise reductions (or as a minimum, no further increases), even in a context of growth.

GATWICK AIRPORT RESPONSE

It is accepted that there is an extensive range of activities undertaken by the airport both historically and also in the future. The establishment of the Noise Management Board has heralded a step-change in how the airport engages with local communities and collaboratively identifies areas for improvements and establishes a workplace for their development and introduction.

The airport is growing and the 2017 Aviation Policy Consultation sets out at para 3.14 that:

“Industry should, as far as is practical, proactively seek to avoid, minimise and mitigate adverse noise impacts, building on existing best practice. This is consistent with the overarching policy principle that the benefits of noise reduction brought about by new technology should be shared between industry and those affected by aircraft noise. This means that communities should benefit from noise reductions, while industry should have space to grow sustainably and serve passenger demand”.

By “industry” Government means manufacturers, airlines, air traffic control and airports. Implicit in the Government’s calculation is that, between now and 2050, manufacturers will continue to invest in research and development to make aircraft quieter and airlines will continue to invest in the new aircraft types, so that overall, noise per movement will decrease.

Further, Government expects that new technology will bring other benefits including:

- airspace changes enabling reductions in the numbers of people overflown on departure and arrival ; and
- other airspace and aircraft performance improvements to enable faster climbs and quieter descents.

The investment by industry thus provides a “dividend” which results in the amount of noise made by each aircraft reducing gradually over time. This is the share that the Community gets in the investment made by industry, together with the wider benefits both locally and to the national economy brought by aviation.

Thus, in the overall policy terms the “sharing benefits of noise reduction between industry and communities in support of sustainable development” is in the context of an expectation that industry will continue to invest, communities should continue to benefit from noise reductions, and that industry “should have space to grow sustainably and serve passenger demand”.

3. Government Policy is confused and contradictory. The actions set out in Gatwick's current NAP have not achieved the END's aim of avoiding, preventing or reducing the impacts of noise. The current NAP has also failed to achieve the government's noise policy objectives, most specifically to "reduce and mitigate noise as airport capacity grows". And the overall objective of reducing noise has not been achieved.

GATWICK AIRPORT RESPONSE

The Government's current aviation noise policy is encapsulated in the 2017 Airspace Policy Consultation Response as follows:

*"The government's overall policy on aviation noise is to limit and, where possible, reduce the number of people in the UK **significantly** affected by aircraft noise, as part of a policy of sharing benefits of noise reduction between industry and communities in support of sustainable development".*

The 2013 Airports Policy Framework (2013 APF) set the sustainable development of airports in the wider context of the National Planning Policy Framework (NPPF 2012), the NPSE (2010), and the UK's climate change commitments. It states that Government wants to make best use of existing airport capacity, this again would appear to the layman to be contradictory to the aviation noise policy as detailed above.

Gatwick Airport Ltd recognises that, at times, Government Policy can appear confused and contradictory. It is for these reasons, and in response to challenges made by the Community Noise Groups that sit on the Noise Management Board, that the airport commissioned a Review of Government Noise Policy and Strategy.

The basic constituent of the above "to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise" appears in the 2003 Air Transport White Paper. The second element "as part of a policy of sharing benefits of noise reduction between industry and communities in support of sustainable development" first appears in the February 2017 Airspace Policy Consultation, however, it is present thematically in the 2013 APF, and indeed can be discerned in 2003 ATWP.

A matter of debate surrounds what constitutes 'significantly' as a number of people may consider themselves to be significantly affected whereas, according to policy, they are affected by low levels of **aircraft noise and so are annoyed, but not significantly affected.**

4. The absence of a complete version of the revised action plan including population counts for the consultation meant there was no context against which to assess whether the proposed measures to reduce noise were appropriate to the scale of the problem, and given the potential obligation(s) that could be placed upon councils around the airport by the plan under UK legislation. All that was provided was a list of potential Action Plan Actions.

GATWICK AIRPORT RESPONSE

Gatwick Airport Ltd initially circulated the list of proposed Action Plan Actions to the Gatwick Airport Consultative Committee, Crawley Borough Council and West Sussex County Council, as well the membership of the Noise and Track Monitoring Advisory Group and the Noise Management Board.

The full document, including feedback received, suggested Action Plan Actions for inclusion and the population counts was circulated to those organisations prior to the end of February 2018 to allow for any further comments to be forwarded to the GATCOM Steering Group meeting of 22 March 2018.

5. The Noise Action Plan should commit to noise impact outcomes. It should specify clear, binding, noise impact reductions together with the time profile for achieving those reductions. The targets should be set based on the government's core policy principles of balance, benefit sharing and noise impact reduction. Gatwick's NAP should commit to noise impact reductions equivalent to or greater than the growth projected by the airport in the NAP period together with a further factor reflecting the growth enjoyed by the industry from 2013-2018 the benefits of which have not been shared with impacted communities. Alongside those noise outcomes Gatwick should set out the actions it intends to take to achieve them, but the risk that those actions fail to achieve the outcomes should be borne by the airport and the wider industry not by communities.

The actions set out in Gatwick's current NAP have not achieved the END's aim of avoiding, preventing or reducing the impacts of noise. The current NAP has also failed to achieve the government's noise policy objectives. There is no reason to believe that a similarly structured set of noise actions for the 2019-24 period would be any more successful in achieving the END's aims and the government's policy objectives. Gatwick has announced plans to continue to grow in that period. In the absence of appropriate action by regulators to enforce the Directive and government policy, that is likely to mean that the noise environment around the airport will continue to worsen, as it has done over the current NAP period. The government should not approve any NAP that fails to reflect these or comparable principles.

GATWICK AIRPORT RESPONSE

Action Plans are a legal requirement under Directive 2002/49/EC relating to the Assessment and Management of Environmental Noise. This Directive is commonly referred to as the Environmental Noise Directive or END. The requirements of the END are transposed in the Environmental Noise (England) Regulations 2006 as amended ("the Regulations"). Both the Directive and the Regulations contain no requirement to commit to binding noise impact outcomes.

In accordance with the Regulations, Gatwick has proposed actions which aim to manage noise issues and effects, including noise reductions. An approach which is consistent with the Government's Aviation Policy aim to limit and where possible reduce the number of people in the UK **significantly** affected by aircraft noise.

The Secretary of State for DEFRA, in liaison with the Department for Transport, will form a view regarding whether or not the submitted revised plan meets the requirements of the Regulations and, therefore, whether or not the plan is appropriate for adoption.

If the Secretary of State for DEFRA considers that the requirements set out in the Regulations are met, they will notify the airport accordingly that the Action Plan has been adopted. The Action Plan should then be published by the Airport Operator as a public document in an electronic format within 28 days.

If the requirements set out in the Regulations are not met, the airport operator will be required to make the necessary changes to the plan. Following revision, the revised plan will need to be resubmitted to the Secretary of State for DEFRA by an agreed date for further consideration.

6. The Noise Action Plan noise reduction targets should be independently monitored and enforced. If the targets were not achieved, or appeared unlikely to be achieved, DEFRA's Secretary of State should intervene and require the airport to take measures, including limiting its growth, so as to achieve them.

GATWICK AIRPORT RESPONSE

In accordance with the DEFRA guidance, the proposed actions within Gatwick's Noise Action plan have been assessed to determine their expected outcome and how this will be tracked.

In addition, as the proposed actions within the Gatwick's noise action plan complement the Section 106 Legal Agreement with West Sussex County Council and Crawley Borough Council. Gatwick is subject to an independent review and audit of selected actions as part of the annual S106 monitoring process. The Final Annual Monitoring Report circulated to Crawley Borough Council and West Sussex County Council for circulation among the wider local authorities and the Gatwick Airport Consultative Committee. This report is published on the Airport website.

7. Lack of clarity on who should produce the Noise Action Plan – “the EU legislation directs member states to produce noise action plans for major roads, railways, agglomerations and airports but does not stipulate which parties within the member state should produce these plans. In the UK, the Government has directed that Gatwick Airport Ltd shall produce that plan for Gatwick Airport. It is, therefore, the UK's noise action plan for Gatwick Airport; it is not Gatwick Airport Ltd's noise action plan”.

The current NAP has not been an effective policy instrument primarily because it is based on inputs rather than outcomes and because it entirely ignores the significant growth that has occurred at Gatwick.

GATWICK AIRPORT RESPONSE

Action Plans are a legal requirement under Directive 2002/49/EC relating to the Assessment and Management of Environmental Noise. This Directive is commonly referred to as the Environmental Noise Directive or END. The requirements of the END are transposed in the Environmental Noise (England) Regulations 2006 as amended (“the Regulations”).

The END requires Member States to produce strategic noise maps for the main sources of environmental noise, i.e. major roads, major railways, major airports and agglomerations every five years.

Action Plans must be drawn up by the airport operators and be based on the results of the noise mapping. The Regulations also require the Action Plans to be reviewed at least every five years and revised if necessary and whenever a major development occurs affecting the existing noise situation.

DEFRA is required under the END to submit summaries of each airport Action Plan to the European Commission no later than 18th January 2019. Each airport is also required to publish their Action Plan by this date. The regulations also require that each Action Plan is formally “adopted” by DEFRA's Secretary of State before the above steps can take place. DEFRA will contact each airport to agree a timetable for adoption and publication of their Action Plan.

8. The Department for Transport is the noise regular for Gatwick Airport and as such the Government sets laws and rules relating to aircraft noise management however the airport operator also has a legal duty to operate the airport in such a manner as to make its facilities open to all types of aircraft operator which may result in noisier types of aircraft being operated.

GATWICK AIRPORT RESPONSE

The Secretary of State for Transport has specific responsibility for noise control at Heathrow, Gatwick and Stansted airports. Certain noise mitigation measures are promulgated in the London Gatwick Aeronautical Information Publication (AIP) and the Flight Performance Team at Gatwick Airport reports compliance against these measures on a quarterly basis.

In addition, Gatwick Airport also has a Section 106 Legal Agreement in place with Crawley Borough Council and West Sussex County Council that includes further obligations and Action Plan Actions relating to both air and ground noise management. The Noise Management Board has also overseen the implementation of the recommendations of the Independent Review of Arrivals and its own, mutually agreed work plan.

The London Gatwick Conditions of Use document details all of the requirements that aircraft operators are required to adhere to, and also provides an overview of the aeronautical charges levied to airlines. While the airport operator cannot arbitrarily forbid a slot-holding airline to operate solely dependent on noise levels (subject to the aircraft type not being banned from operating in the UK/EU), it does detail how financial penalties and charging differentials can influence what aircraft type an airline may opt to operate in and out of the aerodrome.

All of the above illustrates that the noise mitigation measures stipulated by the Secretary of State do not operate in isolation and form part of a suite of measures aimed at managing noise at Gatwick Airport.

9. There should be a reappraisal of the format of Gatwick's Noise Action Plan, the obligations it imposes on the airport and the wider industry and the consequences of failing to meet those obligations.

GATWICK AIRPORT RESPONSE

The comments in response to item 5 refer.

10. It was disappointing to see the consultation largely restricted to the airport consultative committee, rather than the airport undertaking a wider direct consultation with residents affected by noise from the airport.

GATWICK AIRPORT RESPONSE

Section 3.4 of the "Guidance for Airport Operators on how to revise Noise Action Plans under the Environmental Noise (England) Regulations 2006 (as amended)" states that "It is envisaged that once the plan has been revised it will be presented to the Airport's Consultative Committee for comment, and any other appropriate bodies depending on the extent and nature of the revisions. The Airport Operator should summarise the comments received in the revised plan together with their response to the issues raised."

Gatwick Airport Ltd has circulated the draft list of Action Plan Actions and subsequently the full Noise Action Plan document to those organisations listed at the head of this section therefore the airport has gone above and beyond what was required of it.

11. The Government issued guidance to Gatwick Airport that the END Noise Action Plan review was to be 'light touch' while also instructing Gatwick to 'maximize its use of the airport'.

GATWICK AIRPORT RESPONSE

When Gatwick Airport Ltd was notified of the requirement to revise its Noise Action Plan, DEFRA advised that, as the airport already had a Noise Action Plan in place, a relatively light touch "review and revise" updating process was proposed. That said, in the draft list of proposed Action Plan Actions circulated at the commencement of the consultative process:

- 26 Previous Action Plan Action had been removed;
- 8 Action Plan Actions had been retained;
- 18 Action Plan Actions had been revised;
- 27 Action Plan Actions were new.

It is longstanding Government policy to use the capacity afforded by existing airport sites and stability in the airspace routing structure and this is also consistent with its policy "to limit noise". For example, the 2013 Aviation Policy Framework advocates that airports make the best use of existing runway capacity to improve performance, resilience and passenger experience, encouraging new routes and services.

12. The Department for Transport had the opportunity with the recent review of the Night Flight Restrictions to further reduce the number of movements and quota count, which it failed to do.

GATWICK AIRPORT RESPONSE

The Government published its decision on the next night flights regime for Gatwick in 2017 and this will be in place for the period October 2017 to October 2022. The movements limit remains unchanged however the night quota limit will be reduced as set out below.

During the summer season, the number of air traffic movements permitted during the night period is limited to 11,200 and 3,250 during summer and winter respectively. The night quota limits will be reduced to 5,150 in the summer (from 6,200) in 2018 and to 1,785 in the winter (from 2,000) in 2017/18. This will further incentivise the use of quieter aircraft by encouraging industry to plan its operations with sufficient headroom to ensure the limits can still be complied with in the event of unplanned disruption or changes to their schedules.

13. No initiatives by the Government are included in the list of draft Action Plan Actions.

GATWICK AIRPORT RESPONSE

While this draft END Noise Action Plan focusses on issues particular to Gatwick Airport and its environs, there are a number of initiatives underway at a Government level however it wasn't deemed appropriate to include them in this document.

A key development will be the establishment of an Independent Commission on Aviation Noise (ICCAN) by spring 2018. Within 2 years it will be decided whether ICCAN should be given statutory powers of enforcement.

ICCAN will advise on airspace change and share best practice. ICCAN will be a key consultee in both airspace change and planning processes and will have a role in verifying airports' monitoring and communication of noise impacts. ICCAN should have a role in the monitoring and quality assurance of airport noise measurements and reporting, as well as how such measures are enforced.

The Government hopes that ICCAN will rebuild trust between industry and communities and make sure noise impacts are properly and transparently considered.

ICCAN will not be responsible for investigating breaches in noise restrictions as “This requires a broad understanding of the context for individual breaches, such as safety and air navigation matters, to ensure that decisions take into account all factors”.

14. The latest Noise Action Plan does not contain clear targets to reduce the impact of noise around Gatwick, especially at night.

GATWICK AIRPORT RESPONSE

As Gatwick Airport already has an Action Plan in place from previous rounds of END noise mapping, the current plan should be reviewed and revised to include, as necessary:

- updated details about the airport and its operation;
- the results of the noise mapping completed in 2017;
- the progress made against the actions described in the current Action Plan;
- updated information about relevant legislation and standards;
- updated relevant national and local policies;
- information about on-going actions; and
- information about any proposed new actions.

When revising their plans, airport operators should ensure that all the requirements set out in the regulations (listed above and described further in Annex C of the Guidance to Airport Operators) are met. Once the plan has been updated and finalised, the Regulations require that it be sent to the Secretary of State for DEFRA for formal “adoption”.

GENERAL COMMENTS ON THE PROPOSED ACTION PLAN ACTIONS

The Action Plan should commit to noise impact outcomes. A step towards this would be the development and implementation of noise metrics, in consultation with the community, to track progress of the airport's noise reduction performance.

GATWICK AIRPORT RESPONSE

Addressed in response No. 5 and 6 which noted that this is a matter of Government Policy.

As a separate work stream, under the governance of the Noise Management Board, Gatwick is investigating both UK Aviation Policy and noise metrics to determine how progress, in terms of noise management and/or reduction could be reported.

It is important that Gatwick Airport Ltd 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. The Gatwick Airport Consultative committee has identified the following actions for consideration as priorities – Actions 9, 25, 31a 39 and 39a.

GATWICK AIRPORT RESPONSE

Gatwick is open to discussion with GATCOM which actions are considered priorities for implementation. This will form part of a subsequent discussion once the action plan has been agreed by DEFRA.

The proposed actions provide clear commitments from Gatwick Airport Ltd 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? Gatwick Airport Ltd is requested to review 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 Noise Action Plan which have been removed, the rationale for their removal is provided in each and every case.

GATWICK AIRPORT RESPONSE

It is appreciated that the performance indicators for the actions could be improved and steps have been taken to update these in the revised Action Plan. However, in some cases it is not possible to provide, with a degree of certainty, the likely benefit of some actions as:

- the action may relate to a study for which the likely benefits are not known; or,
- the action may relate to a number of smaller studies which are planned to deliver benefits in a time period within the Action Plan duration, for example the Noise Management Board and its 2017/2018 and subsequent workplans. In these cases, the relevant oversight group for that action, such as the NMB, NaTMAG or GNMG will determine the individual success factors and likely benefit of each action. Where appropriate, this information will be made publicly available; or,
- the action may be implemented by Gatwick, but require action from an external party, which is outside of the control of Gatwick to deliver a benefit, for example airline fleet replacement programs; or
- not be applicable to that relevant action, for example the achievement of FPT key performance indicators.

With regard to historic actions which have now been removed from the plan, more information has been added to explain why it was removed from the plan. In most cases this is due to a step change in aviation noise management since the last Noise Action Plan. The work of the Airports Commission, DfT, CAA and Gatwick itself through the Independent Arrivals Review and the creation of the Noise Management Board has led to a drastically different baseline on which the Noise Action Plan is being developed. The change in landscape has resulted in the majority of the actions previously listed either being overtaken by recently completed, in progress or planned work.

With measures 1 to 8, 10-12, 13-19, and 20 to 26 in the proposed action plan there is no indication given as to what improvement these measures will deliver over the next 5 years. For example with measure 8 no figures are given for the proportion of scheduled day movements that are currently taking place at night so that the impact of the proposed action can be assessed over the next five years. Also, no indication is given as to how much of an impact these late running aircraft are currently having on night noise levels / residents affected.

GATWICK AIRPORT RESPONSE

It is appreciated that some actions are not outcome based and measurable and steps have been taken to review and update the performance indicators. As listed above, in some cases it is not possible to provide, with a degree of certainty, an accurate estimate of the improvement at this stage.

With regard to the actions in question, the Flight Performance Team quarterly and annual reports track progress against a number of key performance indicators and could be used as a basis for tracking impact in comparison to historic periods.

SPECIFIC COMMENTS ON THE PROPOSED ACTION PLAN ACTIONS

Action 1. Publishing the track fleet mix would allow year on year comparison. Could use an index which uses the Quota Count system to calculate average for summer/winter.

GATWICK AIRPORT RESPONSE

Fleet mix is currently reported to the Noise and Track Monitoring Group (NaTMAG). It is appreciated that the publication of this figure will allow for a year on year comparison and options for the publication of this figure will be explored, either through Action 1 (Charging differential to incentives the use of aircraft with the best in class noise performance) or Action 5 (Programme to rank airlines in relation to their overall performance for a range of noise and emissions impacts).

Action 3. The objective of this action is not clear to us. Please could it be clarified?

GATWICK AIRPORT RESPONSE

This will incentivise through our aeronautical charging structure the increased use of the quietest and cleanest aircraft at Gatwick Airport.

Action 4. This is an action in the current NAP, with a league table due to be published in 2014. The action is assessed as on-track (green) in the GAL's 2016 performance report published in January 2017. The action should be expedited. A worked-up proposal should be brought to the NMB by summer 2018 and an initial league table published in autumn 2018. The proposals should include financial incentives for performance improvement to the fullest possible extent.

GATWICK AIRPORT RESPONSE

The noise league table was listed on the previous noise action plan and was incorporated as part of the NMB 2017/2018 work plan to provide additional focus. Although the activity was listed on the NMB's 2017/2018 work plan, it was not designated as a high-priority and instead the NMB decided that additional focus should be placed on the delivery of Fair and Equitable Dispersal (FED), Continuous Descent Operations (CDO), Reduced Night Noise (RNN) and Noise Abatement Departure Procedures (NADP).

Despite not being a high-priority of the NMB, Gatwick and its independent consultants have commenced work on the scoping, design and implementation of a noise league table. This program is expected to be complete in 2019 and the proposals would be circulated to relevant stakeholders for comment.

Action 5. As currently drafted this simply sets out GAL's legal obligation to consult on charges. We would like to see more detailed actions that reflect the proposals we (the CNGs) made to GAL in our response to its 2018/19 charges consultation (dated 29 September 2017).

GATWICK AIRPORT RESPONSE

In 2017, Gatwick has explained to the NMB the regulations and laws under which the airport's charging policy exist. Despite the NMB not being formal consultees in the charge consultation process, Gatwick agreed to circulate the relevant consultation papers for comment. The NMB provided formal response and these were considered by Gatwick and covered in its decision paper. As noted in the action, Gatwick will continue to seek the views of the NMB using the same process as above in future airport charges consultations.

Action 6. This does no more than set out GAL's legal obligations in relation to night flights. In addition to our comments on charges (5 above) we propose two additional actions:

(1) that GAL should voluntarily transfer responsibility for all derogation decisions to DfT and

(2) that GAL should not seek to grow night flights (particularly in the winter period where there is surplus permitted capacity) unless it can be clearly and independently demonstrated that there is net economic benefit in doing so taking account of all externalities.

GATWICK AIRPORT RESPONSE

The DfT provides oversight on the management of the night quota period, including reviewing decisions for dispensations made by the Airport. As noted in the 2017 DfT consultation on night flight restrictions, the Government had not received any evidence that dispensations are being used inappropriately. The DfT noted that they will continue to monitor the use of dispensations and carry out further work to consider whether the current process for issuing dispensations is appropriate. Gatwick will support any ongoing work as required.

With regard to night flights, the 2017 consultation reviewed the night movement and quota limits. The DfT concluded that it was not appropriate to make any changes to Gatwick's movement limits as reducing the number of night flights would add to the capacity constraints that are already facing the south east. In accordance with Government Policy, from the winter of 2017/18 a reduced the quota limit and a new quota class for certain aircraft types will be introduced by the DfT. Both initiatives will ensure *'we reap the benefits of a strong aviation sector over the coming years while continuing to limit or reduce the number of people significantly affected by aircraft noise at night, through ensuring that aircraft cannot get any louder and that a proliferation of movements by exempt aircraft is prevented.'*

Action 9. A mandatory ban should be imposed by the Department for Transport and that such an action by them should be included in the plan. Without prejudice to that view, until such time as that happens, the voluntary ban should occur well before 2024.

There is no reason why a ban on QC4 aircraft operating could not be introduced from summer 2019 rather than 2024.

The ban must apply to the night period (23:00 to 07:00) as defined under the EU directive as this plan is published as part of the END, not the 'core night' period (23:30 to 06:30)

During the summer period of 2017 there were in excess of 40 QC4 flights (all from the same airline) that were repeatedly late (scheduled day) departures in the night period which went on for 6 months, led to numerous complaints from residents, and also resulted in two breaches of the night noise departure limits (this compares to one such event in the previous five years). Given there were 10 such departures in the first month of the summer but the practice continued for another 5 months indicates that the current controls in place are insufficient to remain in place for another 7 years.

A ban on QC4 aircraft at night would follow past practice at the airport of improving the night noise regime by first stopping the scheduling of a given QC rated aircraft followed by a ban on the use of such aircraft at night.

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.

Night noise is the most harmful of aviation noise.

Follow Heathrow's lead on introduction on a ban of night flights during the quietest period of the night.

This should be brought forward to 2019 at the latest.

GATWICK AIRPORT RESPONSE

The Secretary of State for Transport has specific responsibility for noise control at Heathrow, Gatwick and Stansted airports and the application of such a ban is a matter of Government Policy. As an airport operator, Gatwick cannot arbitrarily restrict or forbid a slot-holding airline to operate solely dependent on noise levels either directly, or through the application of a QC ban (subject to the aircraft type not being banned from operating in the UK/EU).

There are potential opportunities to introduce voluntary measures and these will be explored as part of this activity. Concerns regarding the timeframe in which the voluntary ban could come into effect are appreciated and the target has been brought forward to 2022 from 2024. However any voluntary initiative will be subject to agreement with the airlines.

Action 15. The NMB's work programme envisages this work being completed by end 2018. The metric should therefore be reported from January 2019 at the latest. The proposals should include financial incentives for performance improvement to the fullest possible extent.

GATWICK AIRPORT RESPONSE

The action has been updated with a planned completion date of 2019. Proposals for financial incentives would be explored by Gatwick on conclusion of the study.

Action 21. This action suggests that a single noise abatement procedure be specified for all routes out of Gatwick. As for any given route, a different procedure may be optimal, therefore action 21 is not sufficiently challenging. (Explanation: There are currently two types of departure procedure but at Gatwick Airport there is currently no preferred one. Unfortunately, which one is optimal for a given departure route depends upon many factors including where populations of residents exist beneath them. It may be the case that the procedure which is optimal for one departure route may not be optimal for another. We are suggesting that it is possible to specify different departure procedures for different routes in order to maximise the overall noise reduction.)

The airport currently operates two noise abatement departure procedures from the airport, allowing the airline operator to choose which to use. Rather than settling on one of these procedures for all departure routes from the airport as proposed, each route should be assessed individually and the airport adopt the optimal departure procedure for a given route.

GATWICK AIRPORT RESPONSE

Noise Abatement Departure Procedures (NADP) are a general noise management procedure which are used between 800ft and 3,000ft. The procedure changes the location of noise benefit to either be close to the runway (NADP 1) or at an increased distance from the airport (NADP 2). The specific location of this benefit can vary depending on the aircraft in question and the airline's own specific procedures.

Gatwick currently has an ongoing program of works to investigate the potential benefits and dis-benefits of both procedures, this includes a consideration to noise, emissions and fly-ability. The study has not concluded yet and is linked to an additional study commissioned by the DfT ANMAC group which is investigating NADP at Gatwick, Heathrow and Stansted.

Gatwick will await the results of these studies before implementing a preferred procedure.

However, in accordance with guidance published by the International Civil Aviation Organisation (ICAO), the airport cannot mandate the use of a single NADP and instead only a recommendation can be made. In addition, ICAO Document 8168 restricts the total number of departure procedures to two per aircraft for a given airline, this requirement is mandated within EU Law EU OPS 1.235. These requirements both rule out the mandated use of a single procedure and the use of specific local procedures or variations. As a result, the use of anything other than a recommended single NADP is highly likely to increase the risk of non-compliance and remove the likely benefits that could be realised.

Action 22. Equivalent reviews should be carried out on all other departure routes.

GATWICK AIRPORT RESPONSE

As reported in the minutes of NMB/8, initial efforts focussed on these two routes for legacy reasons, it was not intended to suggest that work on other routes is excluded and it was agreed that the Departures work objectives would be updated to include other departure routes. A newly revised NMB 2017/2018 work plan was circulated to NMB/9 to note this change and this Action has been updated accordingly.

Action 24. 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.

The Department for Transport departure noise limits are now over 15 years old, with the limits set based primarily on aircraft that no longer exist in the fleet. Given that aircraft noise is still a health issue around the airport especially at night, the airport should introduce a revised set of departure noise limits specific to Gatwick (as allowed by the Department for Transport) to minimise any unnecessary noise impact on residents around the airport.

GAL should publish details of all breaches including the individual and aggregate amount of fines levied.

GATWICK AIRPORT RESPONSE

Noise limits are set by the Secretary of State for Transport which has specific responsibility for noise control at Heathrow, Gatwick and Stansted airports. The specific noise limits are noted within the Gatwick Airport - London (Noise Abatement Requirements) Notice 2004 and are noted in the AIP. As an airport operator, Gatwick cannot arbitrarily restrict or forbid a slot-holding airline to operate solely dependent on noise levels (subject to the aircraft type not being banned from operating in the UK/EU).

However, it is appreciated that these noise limits are now rarely broken and as part of Action 25, Gatwick will engage with the DfT via the ANMAC committee to commence a review of departure noise limits.

Details of fines levied are contained within the Flight Performance Team annual and quarterly reports.

Action 25. GAL could introduce its own lower limits if the Department for Transport will not support a change. Bring forward to 2020.

GATWICK AIRPORT RESPONSE

The Secretary of State for Transport has specific responsibility for noise control at Heathrow, Gatwick and Stansted airports. The specific noise limits are noted within the Gatwick Airport - London (Noise Abatement Requirements) Notice 2004 and are noted in the AIP.

It is appreciated that these noise limits are now rarely broken and as part this Action, Gatwick will engage with the DfT via the ANMAC committee to commence a review of departure noise limits.

Action 27. Whilst this undertaking is appreciated, it is felt that it should not form a part of a *noise* action plan. GAL should publish details of the aggregate amount provided under this and other compensation.

GATWICK AIRPORT RESPONSE

Whilst it is appreciated that this action is not directly related to noise, it is an important action to manage the potential impacts of aviation on the local community. Its inclusion as part of the Action Plan ensures awareness and performance tracking of the scheme.

Action 29. The 2014 scheme should be expanded to include those within the 60 dB LAeq16hr contour.

2014 scheme expanded to include the 60dB LAeq16hr.

GAL should carry out a full review of its compensation schemes based on a polluter pays principle. Any person exposed to increased noise from GAL's operations should be able to claim compensation equivalent to that envisaged under the Land Compensation Act.

GATWICK AIRPORT RESPONSE

The specific recommendations will be included in the review proposed by Action 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."

Action 30. 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.

GATWICK AIRPORT RESPONSE

Both the Property Market Support Bond and Home Owners Support Scheme are voluntary proposals developed by Gatwick and relate to measures which would be enacted should Gatwick be permitted and received planning permission to build a second runway.

As noted in the documentation for both schemes, the areas currently stated are based upon the relevant noise contours. If the second runway was permitted to be constructed, the boundary for the schemes would be extended to include any new properties which may fall within the revised contour. The airport will also any airport which were inside, but then fall outside of the boundary.

Action 31. Include reference to publishing the annual report of the NMB which will list success of work program.

GAL should commit to noise impact reductions equivalent to or greater than the growth projected by the airport in the NAP period together with a further factor reflecting the growth enjoyed by the industry from 2013-2018 the benefits of which have not been shared with impacted communities.

GATWICK AIRPORT RESPONSE

The NMB publish an annual report on progress against its agreed work plan, this has been referenced in the performance indicator and reporting section.

Action Plans are a legal requirement under Directive 2002/49/EC relating to the Assessment and Management of Environmental Noise, commonly referred to as the Environmental Noise Directive or END. The requirements of the END are transposed in the Environmental Noise (England) Regulations 2006 as amended ("the Regulations"). Both the Directive and the Regulations contain no requirement to commit to binding noise impact outcomes. In accordance with the Regulations, Gatwick has proposed actions which aim to manage noise issues and effects, including noise reductions. An approach which is consistent with the Government's Aviation Policy aim to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise.

In order to better measure noise performance, Gatwick has commenced work to identify noise metrics and reporting as part of Activity 2 of the NMB 2017/2018 work plan. As this study will require input from a wide range of stakeholders, the work stream has already been expanded to consider parties external to the NMB such as the Environmental Health Officers, GATCOM, NaTMAG, Gatwick Noise Monitoring Group as well as national bodies such as Sustainable Aviation and DfT ANMAC. Due to the wider applicability of this work, it has been included as a standalone action within the MONITORING AND REPORTING OUR PROGRESS section as Action 39a as follows "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."

Action 39. The night contours should be for the whole night period (23:00-07:00) rather than the Quota Period (23:30-06:00). This is a requirement of the END which specifies 23:00 to 07:00 as night (not the lesser period of 23:30 to 06:00). 'Summer L_{eq} contours' is a repeat of the 'summer 16hr L_{eq} contours' mentioned in the first bullet point. The frequency/years for publication should be specified.

The Night contours should be for the whole night period (23:00-07:00) rather than the Quota Period (23:30-06:00).

'Summer L_{eq} contours' are a repeat of the summer 16hr L_{eq} contours above.

The action discusses the production of 'night quota period' contours. As this is an EU / UK government action plan the contours must be for L_{night} (23:00 to 07:00). If the airport wishes to produce contours for the quota period in addition to the night period this would be welcome.

GATWICK AIRPORT RESPONSE

The contours listed in the draft action plan have been updated and now note:

- Summer 16 hour day L_{eq} (actual)
- Summer 16 hour day (standard) L_{eq}
- Summer Night L_{eq} (actual)
- The above compared to the previous year.
- Summer Night 10 year average modal split L_{eq} .

These contours are produced by CAA ERCD upon direct request and tasking from Gatwick. This work was previously commissioned by the DfT. The 2016 contours were the first to be commissioned by Gatwick Airport Ltd.

Action 40. GAL to commit to publishing noise contours no later than three months after the end of the period in question.

On every occasion that a noise contours reveals an increase in noise impacts GAL should, within a further three months, publish a remediation plan setting out the actions it intends to take to reduce noise impacts to a level consistent with our comment on action 31 above. The remediation plan should be submitted to and agreed with DfT as noise regulator for Gatwick and the NMB.

GATWICK AIRPORT RESPONSE

As Gatwick is now responsible for commissioning the noise contours from CAA ERCD, the airport is exploring contractual options to deliver the noise contours in a timely manner.

With regard to the noise contour increases, this is a matter of Government Policy as neither Directive 2002/49/EC relating to the Assessment and Management of Environmental Noise, nor the Environmental Noise (England) Regulations 2006 which transpose these requirements, require airports to undertake a review of their action plan following the publication of noise contours.

Via Action 39a, Gatwick will investigate noise metrics and reporting to better measure noise performance. This study will help shape and guide the implementation of the actions contained within this action plan to manage noise issues and effects, including noise reductions. An approach which is consistent with the Government's Aviation Policy aim to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise.

Action 42. Methods of complaint should be stated to include complaints through a webpage, free-phone telephone number (which may be to an answer-phone) or by letter to a free post address. (Note: Email is not suggested as that method is capable of abuse by the automation of the sending of emails.)

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.

GATWICK AIRPORT RESPONSE

Currently, in accordance with the updated complaints policy revised after the Independent Arrivals Review, all complaints will need to be processed via Casper with a free-post facility available for those who don't have access to a computer or the internet. The various methods have now been listed on the action plan. In addition, following feedback gathered, the action has been expanded to include a target to re-introduce the telephone complaints system by the end of 2018.

Action 52. This action has been included in order to "create a structure that has capacity to accommodate forecast traffic levels beyond 2040". Achieving desired traffic levels is not in itself an action related to noise reduction (it is more likely to be the opposite). It is suggested that this action should explicitly include undertakings to use the LAMP process to achieve reductions in noise.

Given the magnitude of what is being proposed here, in essence a complete redesign of the London airspace, this is an ideal opportunity to reduce the noise impact of the airport. At present the performance indicator is of no value unless it gives an indication of the noise benefits with and without LAMP in 2024.

GATWICK AIRPORT RESPONSE

The Action has been re-worded to include a noise benefit as follows *"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, reduce the number of people affected by noise and to create a structure that has capacity to accommodate forecast traffic levels beyond 2040."*

Action 53. This is not an appropriate in a noise action plan; it is a noise creation action not a noise reduction action. Instead GAL should support the proposal in the CNG's paper on LAMP 2 that NATS and GAL, together with other London area airports as necessary, should develop new overarching principles for LAMP 2 which:

- reflect the government's aircraft noise policies, including that the benefits of growth should be shared between the industry and impacted communities and that there should be balance between the interests of the industry and those of communities impacted by it.
- rule out any increase in the number of people significantly impacted by aircraft noise, subject to consistency with principles of fair and equitable dispersal agreed or to be agreed
- give equal weight to increasing capacity and reducing environmental impacts, particularly noise.

GATWICK AIRPORT RESPONSE

The Action has been re-worded to include a noise as follows *"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, reduce the number of people affected by noise and to create a structure that has capacity to accommodate forecast traffic levels beyond 2040."*

This wording is consistent with the Future Airspace Strategy (FAS) 2030 vision to establish *"safe, efficient airspace, that has the capacity to meet reasonable demand, balances the needs of all users and **mitigates the impact of aviation on the environment.**"* In addition, managing environmental impacts, including **noise, which is one of the three strategic drivers for modernising UK airspace** alongside safety and capacity. Gatwick will continue to work with the CAA, DfT, NATS and other London airports to ensure that LAMP 2 can deliver a benefit for all in accordance with the Future Airspace Strategy.

SUGGESTIONS FOR INCLUSION OF FURTHER UNDERTAKINGS

Reduce the departure noise limits

This is a matter of regulation and should be for the Department for Transport to implement. See proposed Action 25. Gatwick Airport Ltd could introduce its own lower limits if the Department for Transport will not support a change. In either case it should be brought forward to 2020.

As there is no excuse for modern aircraft and rather old departure noise limits to exceed those limits, the fines should be increased. This should be for the Department for Transport to implement.

Gatwick Airport Ltd could increase fines themselves if the Department for Transport doesn't.

GATWICK AIRPORT RESPONSE

As reported in the feedback to Action 25, the Secretary of State for Transport has specific responsibility for noise control at Heathrow, Gatwick and Stansted airports. The specific noise limits are noted within the Gatwick Airport - London (Noise Abatement Requirements) Notice 2004 and are noted in the AIP. As an airport operator, Gatwick cannot arbitrarily restrict or forbid a slot-holding airline to operate solely dependent on noise levels (subject to the aircraft type not being banned from operating in the UK/EU).

It is appreciated that these noise limits are now rarely broken and as part of Action 25, Gatwick will engage with the DfT via the ANMAC committee to commence a review of departure noise limits.

Introduction of arrivals noise limits.

(This should be an issue for the Department for Transport to consider.)

GATWICK AIRPORT RESPONSE

During the 1990s the Government considered the feasibility of setting noise limits for arriving aircraft through its Aircraft Noise Monitoring Advisory Committee (ANMAC). ANMAC advises the Department for Transport on technical and policy aspects of aircraft noise mitigation and track-keeping policies at Heathrow, Gatwick and Stansted airports.

The work was published by the Department of the Environment, Transport and the Regions (DETR) in 1999, which concluded that it was impracticable to set approach noise limits similar to those for departing aircraft. The Government therefore decided against imposing operational noise limits for arrivals and in February 2000 announced that it would ask the aviation industry to develop a code of practice to promote the use of Continuous Descent Operations (CDO), which the report had identified as the primary means of reducing noise experienced on the ground.

Recently the CAA reviewed the Arrivals Noise Controls with the resulting analysis published within CAP 1554. The study noted that "due to the number of noise monitors required, effective noise monitoring of CDO performance prior to the capture of the glide path would not be practical. However, once aircraft have joined the final approach path, practical approach noise monitoring could be accomplished with a small and practical number of noise monitors, at distances between approximately 6 to 10 NM from landing threshold. Such monitoring would only measure the benefits of low power, low drag (LP/LD) procedures and not CDO.

When monitoring approach noise within 6 to 10 NM from landing threshold, there is limited scope for pilot discretion as the aircraft configuration will to a large extent be dictated by ATC speed control, making it difficult to subsequently attribute any noisier arrival to pilot, aircraft system or ATC action. A limit-based noise monitoring system, similar to that for departures, would therefore not be feasible."

Work to identify noise metrics and reporting to support the measurement of and track progress of, the NMB work plan and Noise Action Plan initiatives.

The Gatwick Airport Consultative committee acknowledges the concerns of local communities about the need for Gatwick Airport Ltd 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.

GATWICK AIRPORT RESPONSE

Work to identify noise metrics and reporting was commenced by Gatwick as part of Activity 2 of the NMB 2017/2018 work plan, currently captured within Action 31 of this Action Plan.

As this study will require input from a wide range of stakeholders, the work stream has already been expanded to consider parties external to the NMB such as the Environmental Health Officers, GATCOM, NaTMAG, Gatwick Noise Monitoring Group as well as national bodies such as Sustainable Aviation and DfT ANMAC.

Due to the wider applicability of this work, it has been included as a standalone action within the MONITORING AND REPORTING OUR PROGRESS section as Action 39a as follows “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.”

Fining for lack of continuous descent approach on landing.

(The continuous descent approach is already a requirement contained within the Aeronautical Information Publication as regulated by the Department for Transport.)

GATWICK AIRPORT RESPONSE

CAP 1554, Review of Arrivals Noise Controls noted that “it is sometimes not possible to achieve a CDO due to a range of factors, including ATC instructions and information, airspace constraints, overriding safety requirements and weather. An analysis of CDO achievement rates over a period of several years may show seasonal peaks and troughs in performance.

In addition, when flying a CDO an aircraft may still require a short segment of level flight in order to reduce speed and/or to reconfigure. Thus without knowledge of the associated ATC voice instructions to flight crew (the monitoring of which would be impracticable), any instances of non-CDO could not automatically be attributed to the flight crew, making it difficult to apply financial or other penalties for not achieving a CDO.”

Fining for breaches of any rule within the Aeronautical Information Publication.

(This should be an issue for the Department for Transport to consider.)

As noted above, due to a range of factors such as ATC instructions and information, airspace constraints, overriding safety requirements and weather it is difficult to apply financial or other penalties for not achieving the rules within the AIP. Gatwick airport’s FPT monitors adherence to the AIP rules and provides information to airlines when these are breached to support continual operational improvement.

Impose a significant reduction in night noise quotas.

(This should be an issue for the Department for Transport to consider.)

GATWICK AIRPORT RESPONSE

The Government published its decision on the next night flights regime for Gatwick in 2017 and this will be in place for the period October 2017 to October 2022. The movements limit remains unchanged however the night quota limit will be reduced as set out below.

During the summer season, the number of air traffic movements permitted during the night period is limited to 11,200 and 3,250 during summer and winter respectively. The night quota limits will be reduced to 5,150 in the summer (from 6,200) in 2018 and to 1,785 in the winter (from 2,000) in 2017/18. This will further incentivise the use of quieter aircraft by encouraging industry to plan its operations with sufficient headroom to ensure the limits can still be complied with in the event of unplanned disruption or changes to their schedules.

Ban the scheduling of QC/2 aircraft in the night period.

(This is a matter for the Department for Transport to consider.)

GATWICK AIRPORT RESPONSE

The Government published its decision on the next night flights regime for Gatwick in 2017 and this will be in place for the period October 2017 to October 2022. Although a QC/2 ban was not subject to this consultation, proposals for a QC/4 ban were made to the DfT.

Introduce a voluntary ban on all QC4 aircraft during the Night Quota Period by 2019.

GATWICK AIRPORT RESPONSE

This request is captured by Action 9 of the proposed action plan, the date of this action was set at 2024 due to the necessary requirement for airline consultation. Concerns regarding the timescale of this action are appreciated and the end date has been adjusted to 2022.

Introduce a ban on scheduling QC4 aircraft during the night period (23:00-07:00) by 2024.

GATWICK AIRPORT RESPONSE

The Secretary of State for Transport has specific responsibility for noise control at Heathrow, Gatwick and Stansted airports and the London Heathrow, London Gatwick and London Stansted Airports Noise Restrictions Notice (No.2) 2017 note:

- QC4 aircraft may not be scheduled to take off or land during the night quota period.
- QC8 and 16 aircraft may not take off or land during the night period.

The Government published its decision on the next night flights regime for Gatwick in 2017 and this will be in place for the period October 2017 to October 2022. Proposals for a QC/4 ban were proposed to the DfT as part of this consultation.

GAL should commission and publish, at least annually, a detailed analysis of the health impacts of the airport's operations and the societal costs involved.

Over time these should identify trends and recommend actions to reduce health impacts.

GATWICK AIRPORT RESPONSE

These comments would be considered as part of the ongoing study to identify noise metrics and reporting as part of Activity 2 of the NMB 2017/2018 work plan to better measure noise performance. This task has been included as Action 39a as follows "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."

From the summer of 2020 no QC 2 flights can be scheduled during the period 23:30 to 06:30, and from 2023 no QC2 flights to be scheduled during the night period (23:00 to 07:00).

The purpose of the measure is to limit the use of the noisiest aircraft at night to minimise the number of people affected by sleep disturbance. This follows past practice at the airport of improving the night noise regime by first stopping the scheduling of a specific QC rated aircraft at night followed in the longer term by a ban on the use of such aircraft at night – as already proposed by the airport for QC4 aircraft.

GATWICK AIRPORT RESPONSE

The Secretary of State for Transport has specific responsibility for noise control at Heathrow, Gatwick and Stansted airports. The Government published its decision on the next night flights regime for Gatwick in 2017 and this will be in place for the period October 2017 to October 2022. Proposals for a QC/4 ban were proposed to the DfT as part of this consultation.

As there are only a few flights during the middle of the night, it is therefore now possible to introduce a no-flight period during the night (01:30-05:00) by 2024.

GATWICK AIRPORT RESPONSE

This request is captured by Action 9 of the proposed action plan.

Produce N60 contours for the night period (and 60 dB L_{ASmax} average contours for the most frequent aircraft types (5% or more of total movements) using Gatwick at night (23:00-07:00).

(Note: The 60 dB contour equates to an internal noise level of 45 dB LA_{max} 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).

We will produce 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).

Production of annual (Calendar year) N60 contours for the airport (standard modal split) for the night period (23:00 to 07:00).

Production of summer N60 contours for the airport (standard modal split) for the night period (23:00 to 07:00).

With these contour maps the airport should also tabulate each year the number of residential premises in each contour band, and after the initial year e.g. 2018 use the same residential data set (2018) for subsequent years, in addition to the residential data set for that calendar year e.g. 2020, so that the improvements in residents' noise exposure can be tracked. The purpose of calculating the figures on both

the original and current residential data set applicable at that time is to allow for new developments that might take place in an area to be accounted for.

The reason for this measure being proposed is that one off noise events above an L_{Amax} of 60 dB outside (45dB L_{Amax} inside) will have a negative effect on sleep and health⁷ and thus the above contours will be a key indicator of the health impact on residents around the airport. From 2024 the airport may wish to consider N50 contours as well given emerging evidence of health effects at levels below 45 dB L_{Amax} .

The production of N60 night time contours is also in line with government guidance.

GATWICK AIRPORT RESPONSE

The above four proposals relate to noise contours published as Action 39. As part of Activity 2 of the NMB 2017/2018 work plan, work to identify noise metrics and reporting was commenced by Gatwick currently captured within Action 31.

Due to the wider applicability of this work, it has been included as a standalone action within the MONITORING AND REPORTING OUR PROGRESS section as Action 39a as follows “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.” The proposals listed above will be included as part of this newly introduced Action.

A compensation payment to each residential household within the 57 dB L_{Aeq} 16h contour beginning in 2019 of £1000 per annum index linked to the retail prices index.

The airport clearly recognises the negative impact of aircraft noise on residents living within the 57 dB contour and above, given its proposals to compensate residents with £1000 per annum outlined in the letter from the company chairman to the prime minister in June 2016.

In economic terms noise at Gatwick is an environmental externality and the above measure is intended to address this issue in the short term, while the longer term objective of the action plan under UK and EU law is achieved.

GATWICK AIRPORT RESPONSE

This refers to a commitment made by Gatwick Airport Ltd in 2014 where an initiative was introduced so that all households most affected by noise from a second runway at Gatwick would receive annual compensation equivalent to Band A Council Tax (currently £1000) if and when the second runway becomes operational.

As Gatwick Airport wasn't chosen as the site for an additional runway in the south-east, it is not appropriate to adopt this proposed Action Plan Action as there are there schemes currently in place, for example the Noise Insulation Scheme that offers up to £3,000 towards double glazing and loft insulation.

A new monitoring and enforcement regime should instead be proposed.

This should include provision that where a target is not achieved, or appears unlikely to be achieved, GAL should first prepare a remediation plan, if this does not promptly result in the achievement of the target GAL should report the failure to the DfT and/or DEFRA Secretary of State requesting direction on the actions it should take.

GATWICK AIRPORT RESPONSE

In accordance with the DEFRA guidance, the proposed actions within Gatwick's Noise Action plan have been assessed to determine their expected outcome and how this will be tracked. The Secretary of State for DEFRA, in liaison with the Department for Transport, will form a view regarding whether or not the submitted revised plan meets the requirements of the Regulations and, therefore, whether or not the plan is appropriate for adoption.

In terms of ongoing monitoring, the proposed actions within the Gatwick's noise action plan will be monitored in accordance with their proposed performance indicator and reporting process. In addition, the proposed actions in this noise action plan complement the Section 106 Legal Agreement with West Sussex County Council and Crawley Borough Council. As part the annual S106 monitoring process, Gatwick is subject to an independent review and audit of selected actions. The Final Annual Monitoring Report circulated to Crawley Borough Council and West Sussex County Council for circulation among the wider local authorities and the Gatwick Airport Consultative Committee. This report is published on the Airport website.

ANNEX 9B – FEEDBACK RECEIVED REGARDING THE INITIAL VERSION OF THE DRAFT NOISE ACTION PLAN DURING THE SECOND STAGE OF ENGAGEMENT, INCLUDING THE GATWICK AIRPORT LTD RESPONSE

As detailed at the commencement of the consultative process, feedback would be sought on the draft Noise Action Plan in its entirety. The date of 26 April 2018 was selected for the closure of this further state of consultation, this being the date of the full meeting of GATCOM.

In the previous round of consultation on the draft list of Action Plan Actions, comments were received from Crawley Borough Council, Horsham District Council, Reigate and Banstead Borough Council, Surrey County Council, West Sussex County Council, GATCOM and a joint letter was received from GACC and the Community Noise Groups of the Noise Management Board. Themes of all feedback received has been set out earlier in this section.

In accordance with the revised guidance from DEFRA to airport operators of February 2018, Gatwick Airport Ltd has considered the feedback provided and adapted its proposed actions accordingly. Key changes included:

- Updated structure of the draft actions table to include more information on the proposed action, costs/benefits, key stakeholders how it is to be tracked and reported and the proposed aim.
- Action 9, covering the voluntary operational ban on Q/C 4 aircraft in the night was brought forward to 2022. This date is now constrained by the required airline consultation process.
- Action 22 which covered a review of departure route limitations on Route 3 and 4 has been updated to cover all routes.
- Action 25 which covered departure noise limits, Gatwick continues to engage with the DfT on an ongoing study into departure noise limits. This study is expected to be completed in Summer 18. If required the DfT confirmed that they would consider a proposal at Gatwick to review these limits further.
- Action 39a has been introduced to capture a range of topics focusing on how noise metrics can be used to measure noise performance. It is a key action required to track the success of the draft NAP actions.
- Action 42, we are investigating options to introduce a complaints phone line by the end of 2018.

The full draft NAP including these changes was released to those organisations who provided comment on the draft list of Action Plan Actions in the first round of consultation and was also published on the Gatwick Airport noise website. Feedback was requested to be directed to the GATCOM members.

Feedback was duly received from the following organisations:

- GATCOM,
- The Community Noise Groups (CNGs) that sit on the Noise Management Board and the Gatwick Area Conservation Campaign.

The feedback received from these organisations is set out in full over the next pages.

RESPONSE FROM THE GATWICK AIRPORT CONSULTATIVE COMMITTEE



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Honorary Secretary

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If calling ask for
Mrs. Paula Street
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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.

VIA EMAIL

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

DX 30330 Chichester

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.

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 48dBA 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,



Assistant Secretary

NMB COMMUNITY NOISE GROUPS' COMMENTS ON GAL'S PROPOSED 2019-2024 NOISE ACTION PLAN ACTIONS

The NMB Community Noise Groups and GACC submitted comments on GAL's draft Noise Action Plan (NAP) actions on 16 February 2018. Those comments, together with our previous NMB paper on Noise Action Plans, are attached as appendices to this document. Our NMB paper sets out our overall view on NAPs. This document sets out our joint comments on GAL's draft full Noise Action Plan V2.01.

Overarching comments

1. We support many of the actions proposed in the draft NAP. However, we continue to believe that the current NAP as a whole has not been effective, largely because it is based on inputs rather than measurable outcomes and because it takes no account of the significant growth that has occurred at Gatwick. CAA data shows that the noise environment around Gatwick has deteriorated every year since the current NAP came into effect.
2. The overall structure of GAL's 2019-2024 draft NAP, and the actions in it, are very similar to those in the current plan. Because Gatwick plans further growth in the 2019-2024 period it is likely that, if adopted and implemented, the draft plan would result in similar outcomes to the current plan. Specifically the noise environment around the airport would be likely to continue to deteriorate. We do not believe this is sustainable or consistent with the END' aims or the government's aviation noise policy objectives. We therefore continue to believe that there should therefore be a reappraisal of the format of Gatwick's NAP, the obligations it imposes on the airport and the wider industry and the consequences of failing to meet those obligations, on the basis set out in our previous comments.
3. None of the actions in the draft NAP meet the requirement in Defra's guidance to set out "the reduction of the number of people affected ... as a result of the measures in the Action Plan". In addition, in our view, few if any of the actions meet Defra's supplementary requirement (set out on page 95 of the draft NAP) that they should be "challenging" and only a handful are "quantified" in any form at all.
4. Numerous references in the introductory sections of the NAP (sections 2-7) are incorrect or out of date. In particular the SONA study findings and government's 2017 airspace policy decisions are not uniformly reflected. The document is wrong to claim that "in the last 15 years the number of people affected by noise within Gatwick's 57 decibel contour has fallen considerably ...". The benefits and likely impact on noise of the NMB is overstated in these sections; this text should be toned down.

The proposed actions

5. Our analysis suggests that only nine of the 53 actions have direct potential to reduce noise. These are actions 1, 2, 3, 5, 9, 15, 17, 22, and 31. Five of those actions are repeated from or comparable to actions in the current NAP (1, 2, 3, 5 and 31), so their incremental impact is likely to be low. Two simply commit to implementing NMB solutions (17 and 31) but with no specificity on what those will be or the outcomes they will secure. One (22) seems likely to be technically very challenging.
6. Most of the other actions commit GAL to consultation, reporting, monitoring, mitigation measures or complying with the law, or will redistribute (rather than reduce) noise. We support most of these actions, but they will not in themselves reduce the airport's noise impacts.

GAL's response to previous CNG and GACC comments

7. Very few of our previous comments have led to changes in the actions proposed by GAL. We draw particular attention to the following comments which we do not believe have been given the thorough consideration required by Defra:

Action / comment number	Previous CNG comment	Current CNG view
Comment 5, 9	The Noise Action Plan should commit to quantified noise impact outcomes	As discussed in 3 above the plan is not quantified in the manner required by Defra. GAL has suggested it is for Defra to consider whether it is adequate in this regard. In our view the current draft of the plan should not be adopted.
Action 5	The NAP should address the comments made by CNGs on the 2018/19 charges consultation	GAL has not responded to this.
Action 39a	-	This action should mirror the new priority workstream now agreed by the NMB, i.e. that the NMB will seek to develop and agree between industry and community representatives a set of metrics, processes and outcomes by which (1) the growth of the airport since 2013 and (2) its future growth are related to reductions in its noise impacts in a proportionate, fair and balanced manner. The current drafting of action 39a is unclear and too restrictive.
Action 40	GAL should prepare a remediation plan when noise contours show there has been an increase in noise.	GAL has dismissed this on the basis that it is a matter of government policy and not required by the END. In our view this misses the point: if noise is increasing the airport should be examining every option to reduce it; the process we have proposed would formalise that in a clear way and make the airport more accountable for its impacts. We would like GAL to reconsider this idea.
-	GAL should commission and publish, at least annually, a detailed analysis of the health impacts of the airports operations and the social costs involved.	GAL's response suggests that this will be addressed as part of its proposal to review noise metrics and reporting (number 39a). In our view these are entirely separate actions. We believe GAL should take greater responsibility for the health impacts of its operations and that the action we have proposed is a constructive way to commence that process. We would like GAL to reconsider this idea.

PREVIOUS NMB COMMUNITY NOISE GROUPS' COMMENTS ON GAL'S PROPOSED 2019-2024 NOISE ACTION PLAN ACTIONS

Overarching comments

The NMB Community Noise Groups with GACC submitted a paper to NMB 9 on Noise Action Plans in general and GAL's current NAP and proposed 2019-2024 NAP actions in particular. That paper is attached as an appendix to these comments. It continues to represent our overall view on NAPs. Key points from the paper are:

1. The actions set out in Gatwick's current NAP have not achieved the END's aim of avoiding, preventing or reducing the impacts of noise. The current NAP has also failed to achieve the government's noise policy objectives, most specifically to "*reduce and mitigate noise as airport capacity grows*". And the overall objective of reducing noise set out in Theresa Villiers' 2010 letter to GACC has not been achieved.
2. The current NAP has therefore not been an effective policy instrument. We believe this is primarily because the NAP is based on inputs rather than outcomes and because it entirely ignores the significant growth that has occurred at Gatwick.
3. There is no reason to believe that a similarly structured set of noise actions for the 2019-24 period would be any more successful in achieving the END's aims and the government's policy objectives. Gatwick has announced plans to continue to grow in that period. In the absence of appropriate action by regulators to enforce the Directive and government policy, that is likely to mean that the noise environment around the airport will continue to worsen, as it has done over the current NAP period.
4. There should therefore be a reappraisal of the format of Gatwick's NAP, the obligations it imposes on the airport and the wider industry and the consequences of failing to meet those obligations. We do not believe that GAL's current NAP or the actions proposed in its draft 2019-2024 NAP are fit for purpose.
5. A new approach should be applied in developing and approving the 2019-2024 NAP, based on the following core principles:
 - I. **The NAP should commit to noise impact outcomes.** It should specify clear, binding, noise impact reductions² together with the time profile for achieving those reductions. The targets should be set based on the government's core policy principles of balance, benefit sharing and noise impact reduction. In our view, therefore, Gatwick's NAP should commit to noise impact reductions equivalent to or greater than the growth projected by the airport in the NAP period together with a further factor reflecting the growth enjoyed by the industry from 2013-2018 the benefits of which have not been shared with impacted communities. Alongside those noise outcomes Gatwick should set out the actions it intends to take to achieve them, but the risk that those actions fail to achieve the outcomes should be borne by the airport and the wider industry not by communities.

² Noise impact reductions should be measured on a basis to be agreed with community groups and representatives. They should include components for both average noise levels and the frequency of noise events at a wide range of locations both close to the airport and further away under flight paths. Metrics should reflect principles of fair and equitable dispersal to ensure noise impact reductions are not achieved by concentrating noise in areas of low population density.

- ii. **The NAP noise reduction targets should be independently monitored and enforced**. If the targets were not achieved, or appeared unlikely to be achieved, DEFRA's Secretary of State should intervene and require the airport to take measures, including limiting its growth, so as to achieve them.

6. The government should not approve any NAP that fails to reflect these or comparable principles.

Points 5 (i) and (ii) above should be regarded as specific comments on GAL's draft 2019-2024 NAP Actions.

We note that DEFRA has subsequently written to all relevant airport operators including GAL making clear, amongst other things, that their plans should include "estimates in terms of the reduction of the number of people affected (annoyed, sleep disturbed, or other)... as a result of [the measures in] their Action Plan" including evidence that the measures are challenging, objective, quantified (where reasonably practicable), subject to specific timescales, and have taken full account of the views of local communities. We believe this is consistent with our point 5 (i) above. DEFRA have also emphasised that the issues raised by consultees are demonstrably given thorough consideration by airport operators and that they will be looking for evidence of how airports have ensured this is the case in their submitted Plans.

PAPER BY THE GATWICK NOISE MANAGEMENT BOARD COMMUNITY NOISE GROUPS WITH THE GATWICK AREA CONSERVATION CAMPAIGN REGARDING ENVIRONMENTAL NOISE REGULATIONS 2006: NOISE ACTION PLANS

Purpose of Environmental Noise Directive and Noise Action Plans

The aim of the Environmental Noise Directive (END) is to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise.

Noise Action Plans (NAPs) are intended to prevent and reduce environmental noise where necessary and particularly where exposure levels can induce harmful effects on human health and to preserve environmental noise quality where it is good.

Action Plans are required to identify whether there are any particular or additional measures that might be taken to meet these policies, including noise reduction if necessary.

Current and historic UK policy context

The UK policy context for Gatwick's 2019-2024 Noise Action Plan (NAP) is the government's current policy on aviation noise. This is:

“to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise as part of a policy of sharing benefits of noise reduction with industry in support of sustainable development”³.

This policy is open to multiple interpretations. The core policy principles seem to be:

1. *Limiting and where possible reducing the number of people significantly impacted by aircraft noise.* Although unclear this appears to rule out *increases* in the number of people significantly impacted.
2. *Sharing of benefits.* This concept is expressed in a range of ways in different government documents. The current airspace policy document (quoted above) talks about sharing benefits of noise reduction. The Aviation Strategy Call for Evidence talks about sharing the benefits of growth and a greater sense of fairness. In any event the principle appears to be that if the industry benefits so should impacted communities. We take community “benefit” in this context to mean absolute reductions in noise impacts, on a basis to be agreed with impacted communities.
3. *Balance.* The executive summary of the government's most recent aircraft noise policy document talks about striking a balance between the economic and social benefits of the industry and its local impacts. Balance is also a core principle in the government's Air Navigation Guidance 2017 issued to the CAA. The plain English meaning of balance is “a situation in which different elements are equal or in the correct proportions”. In the context of aircraft noise we take this to mean that an airport should only be permitted to grow if it reduces its noise impacts. The 2013 Aviation Policy Framework confirms that interpretation (see below).
4. *Sustainable development.* This is not defined, but the Aviation Strategy Call for Evidence talks about supporting growth where environmental impacts can be managed and exploiting all opportunities to reduce the industry's environmental impact. It also raises the idea of targets for noise reduction.

The policy context for the current (2013-2018) NAP is clearer as regards the balance between growth and noise. The overall policy objective when the NAP was approved was to “*limit and where possible reduce the number of people in the UK significantly affected by aircraft noise*”. The policy went on to say “*future growth in aviation should ensure that benefits are shared between the aviation industry and local communities ... This means that the industry should reduce and mitigate noise as airport capacity grows*”⁴.

More broadly it has been UK government policy for many years that the effect of NAPs should be to *reduce*

³ Consultation Response on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace. October 2017

⁴ Aviation Policy Framework page 55

noise impacts. In a letter to GACC dated 27 May 2010 the Aviation Minister Theresa Villiers said “*The noise action plans will make a key contribution to helping to reduce the local noise impacts for residents. ... Can I assure you that these plans are currently being submitted to rigorous scrutiny to ensure that they do meet the underlying aim of the EU Directive namely avoiding, preventing or reducing the harmful effects due to exposure to environmental noise?*”

The success or otherwise of the current NAP should be judged principally by the extent to which it has achieved the END’s aims and facilitated achievement of the government’s historic aircraft noise policies as set out above. If those aims and policies have not been achieved it follows, in our view, that there should be changes in any or all of: the basis on which NAPs are prepared; the actions that individual airports commit to taking; and the way those actions are enforced.

We note that DEFRA’s July 2017 guidance on airport NAPs proposes no substantive changes to the previous round of noise mapping and action planning carried out in 2012 and proposes a relatively light touch “review and revise” updating process. This does not, however, stop individual airports from undertaking a more detailed review and update should they wish.

Assessment of Gatwick’s 2013-2018 NAP

Since the 2013-2018 NAP was published CAA and Gatwick data shows that:

- the number of air traffic movements at Gatwick has grown every year, by over 12% in total;
- the number of passengers using Gatwick has grown every year, by 22% in total;
- the number of people within the 57 dB(A) day contour⁵ has increased every year, by over 27% in total;
- the area covered by the 57 dB(A) day contour has increased every year, by over 8% in total; and
- night flight impacts have also increased as set out in the government’s 2017 night flight consultation.

It is clear that the END’s aim of avoiding, preventing or reducing the impacts of noise has not been achieved in the current NAP period.

Assessing the above data against the current core UK policy principles set out above we reach the following conclusions:

1. *Limiting and where possible reducing the number of people significantly impacted by aircraft noise.* This has not been achieved. The number of people significantly affected, measured using the government’s preferred metric, has increased substantially. Alternative metrics that more accurately reflect the effects of aircraft noise would be likely to show greater increases in impacts. The number of noise-related complaints for example has risen very substantially since 2013.
2. *Sharing of benefits.* This has not been achieved. Gatwick and its industry partners have enjoyed very substantial benefits from the growth of the past four years. But those benefits are not being shared. Noise impacts have increased year-on-year and continue to increase as flights numbers and the average size of aircraft using Gatwick grow.
3. *Balance.* This has not been achieved. There is no credible basis on which it could be argued that the data above represents a balanced outcome as between the interests of the industry and those of impacted communities.
4. *Sustainable development.* This is an insufficiently clear policy to allow an objective assessment to be made, but it has almost certainly not been achieved.

⁵ Whilst we do not believe the 57 dBA contour is an appropriate measure of the impact of aviation noise on communities, it is the only long-term data set that we are aware of. More realistic data that also took account of the number of flights, a key factor for communities, would certainly show greater increases in noise impacts over the same period.

In addition the 2013 APF policy objective to “*reduce and mitigate noise as airport capacity grows*” has not been achieved in any year since 2013. And the overall objective of reducing noise set out in Theresa Villiers’ 2010 letter has not been achieved.

In summary the actions set out in Gatwick’s current NAP have not achieved the END’s aims or the government’s noise policy objectives. The current NAP has therefore not been an effective policy instrument. We believe this is primarily because the NAP is based on inputs rather than outcomes and because it entirely ignores the significant growth that has occurred at Gatwick.

Proposals

There is no reason to believe that a similarly structured set of noise actions for the 2019-24 period would be any more successful in achieving the END’s aims and the government’s policy objectives. Gatwick has announced plans to continue to grow in that period. In the absence of appropriate action by regulators to enforce the Directive and government policy, that is likely to mean that the noise environment around the airport will continue to worsen, as it has done over the past NAP period.

Our view therefore is that there should be a reappraisal of the format of Gatwick’s NAP, the obligations it imposes on the airport and the wider industry and the consequences of failing to meet those obligations. We do not believe that GAL’s current NAP or the actions proposed in its draft 2019-2024 NAP are fit for purpose.

We propose a new approach should be applied in developing and approving the 2019-2024 NAP. This should be based on the following core principles:

- I. **The NAP should commit to noise impact outcomes.** It should specify clear, binding, noise impact reductions⁶ together with the time profile for achieving those reductions. The targets should be set based on the government’s core policy principles of balance, benefit sharing and noise impact reduction. In our view, therefore, Gatwick’s NAP should commit to noise impact reductions equivalent to or greater than the growth projected by the airport in the NAP period together with a further factor reflecting the growth enjoyed by the industry from 2013-2018 the benefits of which have not been shared with impacted communities. Alongside those noise outcomes Gatwick should set out the actions it intends to take to achieve them, but the risk that those actions fail to achieve the outcomes should be borne by the airport and the wider industry not by communities.
- II. **The NAP noise reduction targets should be independently monitored and enforced.** If the targets were not achieved, or appeared unlikely to be achieved, DEFRA’s Secretary of State should intervene and require the airport to take measures, including limiting its growth, so as to achieve them.

We will have detailed comments on the draft list of actions provided by GAL in due course. But we believe that an appropriate set of NAP foundations and principles, which hold the airport properly to account for its noise impacts in accordance with government policy, must be established first.

We do not believe that the government should approve any NAP that fails to reflect these or comparable principles.

⁶ Noise impact reductions should be measured on a basis to be agreed with community groups and representatives. They should include components for both average noise levels and the frequency of noise events at a wide range of locations both close to the airport and further away under flight paths. Metrics should reflect principles of fair and equitable dispersal to ensure noise impact reductions are not achieved by concentrating noise in areas of low population density.

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 by the end of 2024.	<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>	Action changed: We will implement a voluntary ban on operations of Quota Count 4 aircraft within the core night period by the end of <u>2022</u> .	Accept. GATCOM recommends that this Action be identified as a priority early in the Plan period - see also comments in covering letter

	Action	GATCOM Comment	GAL Response	GATCOM Response to GAL's response
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: <i>We will continue to offer acoustic insulation to noise sensitive buildings within the 60LAeq noise contour.</i>	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 LAeq,16hr or more) and a large increase in noise (3dB LAeq or more), in accordance with the Terms of Reference of the Property Market Support Bond and Home Owners Support Scheme.	<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 overflown then a lower figure should be considered.</i>	No amendment made to Action.	Noted. Given the concerns subsequently expressed by a community group about the potential blight arising from changes to airspace, GATCOM no longer wishes to pursue its previous comments.

	Action	GATCOM Comment	GAL Response	GATCOM Response to GAL's response
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 LAeq contours for air noise • Night forecast contours for ground noise • Forecast Lden contours for air noise • Night quota period 48dB LAeq contour (07:00-23:00) • Summer Leq contours 	<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 previous year. • Summer Night 10 year average modal split Leq 	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 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. Recommend that GAL address this point in the final NAP and that it be treated as a priority.

	Action	GATCOM Comment	GAL Response	GATCOM Response to GAL's response
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>

GATWICK AIRPORT LTD RESPONSE TO THE FEEDBACK RECEIVED AND ISSUES RAISED DURING THE SECOND ROUND OF CONSULTATION

Gatwick Airport Ltd welcomes the feedback provided and appreciates the comments made by GATCOM which *“is confident at the end of the consultation process involving GACOM, the NMB community noise groups and Gatwick Local Authorities that GAL will have one of the most comprehensive and effective NAP in the country”*.

The END NAP will be the overarching statutory driver for noise management and mitigation around the airport and GAL confirms its ambitions for the END NAP to be a ‘living document’ involving tracking, regular review and update. The first stage in this process is achieving additional clarity on the aims and commitments to further our work to manage aviation noise, a central theme of the feedback. To meet this GAL has added several actions to the END NAP and in particular, expanded the scope of Action 39a. The revised scope aims to identify new noise metrics and reporting to complement the current noise contours and measure our future noise performance. These metrics could then be used to more precisely describe the aims and outcomes of the actions within this END NAP.

The identification of new noise metrics and reporting will be based upon a review of government policy and its implementation. Through this process we aim to reach a measure of consensus with community groups on future airport utilisation relative to noise impacts. Another output from the feedback.

We appreciate that a key piece of feedback regarded the use of the word ‘aims’ or ‘targets’ with regard to our actions. We note that the END Regulations and DEFRA guidance confirms that no binding targets are required and no penalties are to be imposed furthermore the Regulations and the DEFRA Guidance use the term ‘aim’ and hence our decision to remain with the term ‘aim’.

Due to the importance of Action 39a GAL has designated this as a priority action and GAL confirms that we will discuss the priority of the remaining actions once the END NAP has been accepted by DEFRA.

To support the measurement of our ongoing and planned noise management programs listed within the END NAP; GAL has committed to expanding its community noise monitoring program by procuring and deploying additional noise monitoring terminals. This will provide a vital asset to both understanding the current noise climate whilst measuring the benefits delivered by the END NAP actions and those undertaken by the Noise Management Board via Action 47.

To continue to drive continuous improvement, as part of Action 25, GAL was to explore options to reduce its departure noise limits with the DfT. Following the feedback provided, GAL can confirm that the DfT has confirmed that GAL can explore options to reduce these limits beyond the current set DfT levels and corresponding Action has been updated. To confirm our commitment to improving our noise management we have also introduced Action 24a which aims to increase the fines that are levied against airlines that breach departure noise limits, be these the current or revised limits when they are introduced.

In summary, the following actions have been updated within the draft END NAP in response to the feedback provided:

- **Action 2a** introduced to capture additional aircraft or manufacture specific noise defects which can be rectified by a modification are identified (similar to the FOPP) we will seek to identify, consult and implement corresponding charging penalties. This aims to provide the living document approach which is adaptable based upon changing demands in the future.

- **Action 25** covered a review of the departure noise limits and has been updated to reference both engagement with the DfT and unilateral action following confirmation from the DfT that this approach may be possible given a suitable evidence base.
- The review of noise limits in action 25 is complimented by **Action 24a** which targeted increasing the fines that are levied against airlines that breach the departure noise limits.
- **Action 28a** was introduced to confirm that GAL will undertake a review of its acoustic noise insulation programs by the end of 2019. With subsequent reviews considered every 5 years as noted in Action 28.
- **Action 37a** aims to expand the community noise monitoring scheme by deploying additional noise terminals. This is part of GAL's commitment to understand the noise impacts around the airport whilst identifying and measuring the potential benefits delivered by the actions in this END NAP.
- As previously discussed, **Action 39a** has been expanded to aim to reach a measure of consensus with community groups on future airport utilisation relative to noise impacts. Based upon a review of Government policy including how Government policy should be interpreted and how that policy has been applied in practice, we will aim to develop new noise metrics and reporting to complement the current noise contours and measure our future noise performance. This work will be used to more precisely describe outcomes to support this END Noise Action Plan. Although not specifically mentioned, this Action will consider the use of N-above metrics and their potential inclusion in the annual noise contour reports.
- In addition to the expanded noise monitoring scheme, **Action 49** has been updated to include the production of local and holistic noise reports.

ANNEX 9C – FEEDBACK RECEIVED REGARDING THE FINAL VERSION OF THE DRAFT NOISE ACTION PLAN DURING THE THIRD STAGE OF ENGAGEMENT, INCLUDING THE GATWICK AIRPORT LTD RESPONSE

CONTENT OF THE PAPER ISSUED BY GATWICK AIRPORT LTD TO THE GATCOM STEERING GROUP MEETING HELD ON 21 JUNE 2018

Introduction to the Final Draft END NAP

Background

It was agreed at the meeting of GATCOM on 26 April 2018 that the final draft Noise Action Plan, having been updated in response to the feedback received, be presented to the 21 June 2018 meeting of the GATCOM Steering Group for consideration prior to it being presented for a final time to the full meeting of GATCOM, scheduled for 19 July 2018. The effect of this additional stage of consultation is that there has been three stages of consultation; commencing with the circulation of a proposed list of Action Plan Actions, the circulation of an initial draft Noise Action Plan and culminating in the final draft of the Noise Action Plan being presented.

Feedback received and the changes made

In the previous round of consultation the full draft Action Plan was released to those organisations who provided comment with feedback received from:

- GATCOM,
- The Community Noise Groups (CNGs) that sit on the Noise Management Board and the Gatwick Area Conservation Campaign.

The feedback provided by these parties is included in full, within Annex 9B of the final draft Noise Action Plan.

Gatwick Airport Ltd welcomes and appreciates the feedback provided and has taken this on-board in the development of its final draft. A key theme of the feedback was a desire to identify new noise metrics and more precisely describe the aims, targets and outcomes of the actions. In response, GAL has added several actions as outlined below and in particular has:

- Expanded the scope of Action 39a, to aim to identify new noise metrics and reporting to complement the current noise contours and measure our future noise performance. These metrics could then be used to more precisely describe the aims, targets and outcomes of the actions within the END NAP. The identification of new noise metrics and reporting will be based upon a review of government policy and its implementation. Through this process we aim to reach a measure of consensus with community groups on future airport utilisation relative to noise impacts. Another key output from the feedback.
- Re-affirmed its ambition for the Noise Action Plan to be a 'living document' involving tracking, regular informal review and update. The first stage of this approach will be incorporation of the findings of Action 39a. Due to the importance of this work, GAL has designated this as a priority action. GAL confirms that we will discuss the priority of the remaining actions once the Action Plan has been accepted by DEFRA.

To support the measurement of our ongoing and planned noise management programs listed within the END NAP; GAL has committed to expanding its community noise monitoring program by procuring and deploying additional noise monitoring terminals. This will provide a vital asset to both understanding the current noise climate whilst measuring the benefits delivered by the Noise Action Plan can be measured and assessed.

To continue to drive continuous improvement, as part of Action 25, GAL was to explore options to reduce its departure noise limits with the DfT. Following the feedback, GAL notes that the DfT has confirmed that GAL can explore options to reduce these limits beyond the currently set levels and the corresponding action has been updated.

To confirm our commitment to improving our noise management we have also introduced Action 24a which aims to increase the fines that are levied against airlines that breach departure noise limits, be these the current or revised limits when they are introduced.

In response to feedback and to build upon the success delivered by the A320 fuel over pressure port (FOPP) retrofit. GAL has added Action 2a to identify, consult and implement corresponding charging penalties for any additional aircraft or manufacture specific noise defects which can be rectified by a modification. Finally, GAL has introduced Action 28a to confirm that the airport will undertake a review of its acoustic noise insulation programs by the end of 2019. With subsequent reviews considered every 5 years as noted in Action 28.

Through the feedback provided and the corresponding adaptation to the Noise Action Plan, GAL believes the final draft of the Noise Action Plan provides a comprehensive and effective overarching statutory driver for noise management and mitigation around the airport.

Next steps

The final draft END NAP will be presented to the 21 June 2018 meeting of the GATCOM Steering Group for consideration prior to it being presented for a final time to the full meeting of GATCOM, scheduled for 19 July 2018.

Should the final draft be accepted by GATCOM, regulations require that it be sent to the Secretary of State for DEFRA for formal "adoption". The Secretary of State for DEFRA, in liaison with the Department for Transport, will form a view regarding whether or not the submitted revised plan meets the requirements of the Regulations and, therefore, whether or not the plan is appropriate for adoption.

- If the Secretary of State for DEFRA considers that the requirements set out in the Regulations are met, they will notify the airport accordingly that the Action Plan has been adopted. The Action Plan should then be published by the Airport Operator as a public document in an electronic format within 28 days.
- If the requirements set out in the Regulations are not met, the airport operator will be required to make the necessary changes to the plan. Following revision, the revised plan will need to be resubmitted to the Secretary of State for DEFRA by an agreed date for further consideration.

REPORT FROM THE SECRETARIAT AND TECHNICAL ADVISOR OF THE GATWICK AIRPORT CONSULTATIVE COMMITTEE TO THE MEETING OF THE COMMITTEE HELD ON 19 JULY 2018

SUMMARY

Following GATCOM's consideration at the last meeting of Gatwick Airport Limited's (GAL) draft reviewed Environmental Noise Directive (END) Noise Action Plan (NAP), GAL has considered all the responses received to its consultation and has now produced a final version of the END NAP. The way in which GAL has taken into account GATCOM's comments was considered by the GATCOM Steering Group at its meeting on 21 June. This report sets out the views and recommendations of the Steering Group (see section 3), the on-going concerns of the NMB community noise groups (see section 4) and sets out a final GATCOM response in Appendix 2 for approval.

1. OVERVIEW

1.1 At the last meeting, the Committee's response to GAL's draft reviewed END NAP was agreed. In summary the key points of GATCOM's response was as follows:

- Overall, 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 at the time of publishing the draft document.
- Many of the actions proposed in the draft NAP are supported and the revised format which introduces new additional columns giving 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 is welcomed as it will assist in the monitoring process.
- Whilst a number of GATCOM's comments on GAL's proposed list of actions had been taken into account, GAL had not committed to specifying targets to be achieved and that some actions lacked clear indicators. GAL has been asked to review its "Aims" to make them "Targets".
- 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, GAL has been asked to identify some priority actions that would bring benefits to the noise climate early in the plan period. This 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.
- GAL should do more to pursue 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.

1.2 GATCOM also asked to see the Final Draft END NAP document before it being submitted to Defra for approval.

1.3 GAL has now produced the Final Draft END NAP which was considered by the GATCOM Steering Group at its meeting on 21 June together with GAL's covering report, which is attached at Appendix 1 for consideration. GATCOM is asked to consider and agree its final response to GAL.

2. FINAL DRAFT END NAP

2.1 A copy of the Final Draft END NAP together with the Annexes and GAL's covering report was circulated to all members and supporting officers on 29 June for consideration in advance of the GATCOM meeting.

2.2 The final version of the END NAP has now been split into 2 parts – part 1 is the main document and action plan – part 2 contains all the annexes. It is a comprehensive plan which sets out the overarching approach to noise management at Gatwick and the KPIs to be met on a variety of performance standards.

2.3 GAL's paper attached at Appendix 1 addresses the way in which it has taken account of the feedback received to the consultation on the reviewed draft END NAP. In particular, GAL has advised that:

- Defra's guidance does not require targets to be set as part of the action plan process.
- It has reaffirmed its ambition for the END NAP to be a "living document" involving tracking, regular informal review and update.
- It has expanded the scope of Action 39a relating to the identification of new noise metrics and reporting (a key priority of the Noise Management Board (NMB)).
- A greater commitment has been given under Action 25 to explore options to reduce noise limits beyond those currently set by the DfT.
- A commitment has been given in Action 24a to increase the fines for breaches in departure noise limits.
- A new commitment to implement corresponding charging penalties for any additional aircraft or manufacture noise defects which can be rectified by modification is given in Action 2a.
- A commitment in Action 28a has been given to undertake a review of the noise insulation program by the end of 2019.

3. GATCOM STEERING GROUP'S COMMENTS

3.1 The further refinements to a number of the actions have been welcomed by the GATCOM Steering Group. They address more specifically aircraft noise and disturbance through a variety of management and mitigation techniques, all of which enhance the comprehensiveness of the END NAP. However a key matter on which the Steering Group and GAL have not been able to reach agreement is on having specific targets to support the delivery of the actions in the END NAP. GAL still refers to "aims".

3.2 GAL has stated in its paper at Appendix 1 that the Defra guidance confirms that no binding targets are required and no penalties are to be imposed. GAL has also stated:

"Expanded the scope of Action 39a, to aim to identify new noise metrics and reporting to complement the current noise contours and measure our future noise performance. These metrics could then be used to more precisely describe the aims, targets and outcomes of the actions within the END NAP. The identification of new noise metrics and reporting will be based upon a review of government policy and its implementation. Through this process we aim to reach a measure of consensus with community groups on future airport utilisation relative to noise impacts. Another key output from the feedback."

3.3 In addition to this GAL has re-affirmed its ambition for the Noise Action Plan to be a 'living document' involving tracking, regular informal review and update. The first stage of this approach will be incorporation of the findings of Action 39a and GAL has designated this as a priority action.

3.4 As regards GATCOM wish to see priority given to certain actions, GAL has confirmed that this will be the subject of discussion once the END NAP has been accepted by DEFRA.

3.5 Whilst the Steering Group welcomed GAL's approach in respect of the priority to be given to Action 39a and the scope to use the outcome of that work to describe the aims, targets and outcomes of the actions in the END NAP, it was disappointed that GAL had not taken the opportunity to set an overarching target in the END NAP against which the overall noise performance could be meaningfully monitored and tracked. It is acknowledged that neither the Environmental Noise (England) Regulations 2006 or Defra's Guidance refer to the setting of targets and that both documents only refer to the term "aim" (they are silent on the use of the term "target"), the Steering Group felt 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 was something that GAL should embrace. The Steering Group therefore recommends that this matter be raised in GATCOM's response to GAL.

3.6 The suggested draft GATCOM response is set out in Appendix 2 for consideration and approval.

3.7 The Steering Group was also of the view that the Government needed to have a greater oversight of the airport's noise performance generally to ensure that airports were managing the noise climate in accordance with the Government's policy objectives. It is therefore suggested that GATCOM raises this point with the Government and to seek clarification on how it intends to monitor the implementation and effectiveness of the Gatwick NAP to ensure it delivers the aims of Government policy.

4. NMB COMMUNITY NOISE GROUPS VIEW

4.1 As GATCOM is aware, the views of the NMB Community Noise Groups and Gatwick Area Conservation Campaign have been reported to GATCOM both at the time of considering the proposed draft list of actions ([January 2018](#)) and the reviewed Draft END NAP ([April 2018](#)). The NMB Community Noise Groups are still of the view that GAL's Final Draft END NAP is not compliant with Defra's guidance. They also believe that GAL's undertaking to develop new noise metrics and reporting (in Action 39a) is inadequate and cannot be relied on given GAL had previously committed to developing such metrics by 2011.

4.2 This view was again expressed at the recent meeting of the NMB held on 27 June which they wished to bring to the attention of GATCOM. The Committee is therefore asked to take their views into consideration in agreeing its final response to GAL.

RECOMMENDED

(1) that the suggested draft response to GAL's Final Draft END NAP as set out in Appendix 2 be approved; and

(2) that GATCOM writes to Defra and the DfT to highlight the need for a greater oversight of the airport's noise performance generally to ensure that the airport was managing the noise climate in accordance with the Government's policy objectives.

PAULA STREET
Secretariat

GATCOM RESPONSE TO FINAL DRAFT END NOISE ACTION PLAN

Tony Kershaw
Honorary Secretary

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Gatwick Airport Consultative Committee

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If calling ask for
Mrs. Paula Street

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24 July 2018

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.

cont'd...

VIA EMAIL

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

DX 30330 Chichester

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.

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,



Assistant Secretary

GATWICK AIRPORT LTD RESPONSE

Although GATCOM's comments on "aims" and "targets" are appreciated, GAL would like to re-iterate its desire to identify new noise metrics and more precisely describe the aims, targets and outcomes of the actions contained in the END NAP. We plan to do this using our "living document" approach which involves tracking, regular informal review and update. The first stage of this process is the integration of the currently ongoing growth and noise work captured by Action 39a which has been designated as a priority. This work will also aim to reach a measure of consensus with community groups on future airport utilisation relative to noise impacts, providing a first step towards the setting of overarching targets as requested by GATCOM. These adaptations will be tracked through the regular reporting of the END NAP on an annual basis.

In addition, we have noted our willingness to discuss priority actions with GATCOM once the END NAP has been agreed with DEFRA, at this time we can seek to prioritise actions 9, 25, 39 and, where possible, accelerate the implementation of these. Action 39a is already designated as a priority.

As an airport we operate within Government policy. Issues that arise from differing viewpoints on the interpretation of this policy create issues for all and as a result we welcome GATCOM's proposals to write the DEFRA and the DfT regarding the ongoing monitoring of the END NAP. GAL would like to extend an offer to work with and support GATCOM, the DfT and DEFRA in this piece of work.

ANNEX 10 – THE RESULTS OF PREVIOUS NOISE MAPPING

Figure 34: Estimated Total Number of People and Dwellings above Various Noise Levels, L_{den}

NOISE LEVEL (DB)	NUMBER OF DWELLINGS 2016	NUMBER OF PEOPLE 2016	NUMBER OF DWELLINGS 2011	NUMBER OF PEOPLE 2011	NUMBER OF DWELLINGS 2006	NUMBER OF PEOPLE 2006
≥ 55	5,450	13,500	4,500	11,300	4,700	11,900
≥ 60	950	2,300	850	2,000	1,300	3,200
≥ 65	250	600	200	500	250	600
≥ 70	<50	<100	<50	<100	50	100
≥ 75	0	0	0	0	0	0

Figure 35: Estimated Total Number of People and Dwellings above Various Noise Levels, L_{day}

NOISE LEVEL (DB)	NUMBER OF DWELLINGS 2016	NUMBER OF PEOPLE 2016	NUMBER OF DWELLINGS 2011	NUMBER OF PEOPLE 2011	NUMBER OF DWELLINGS 2006	NUMBER OF PEOPLE 2006
≥ 54	4,000	9,800	3,550	8,700	4,100	10,300
≥ 57	1,350	3,200	1,200	2,800	1,850	4,400
≥ 60	550	1,400	500	1,200	500	1,300
≥ 63	250	600	200	500	250	600
≥ 66	50	200	100	200	150	300
≥ 69	<50	<100	<50	<100	<50	<100
≥ 72	-	-	-	-	0	0
≥ 75	-	-	-	-	0	0

Figure 36: Estimated Total Number of People and Dwellings above Various Noise Levels, $L_{evening}$

NOISE LEVEL (DB)	NUMBER OF DWELLINGS 2016	NUMBER OF PEOPLE 2016	NUMBER OF DWELLINGS 2011	NUMBER OF PEOPLE 2011	NUMBER OF DWELLINGS 2006	NUMBER OF PEOPLE 2006
≥ 54	3,300	8,000	2,600	6,400	2,550	6,200
≥ 57	900	2,100	750	1,800	750	1,900
≥ 60	450	1,000	300	700	350	800
≥ 63	150	400	150	400	150	400
≥ 66	<50	100	<50	100	<50	100
≥ 69	0	0	0	0	<50	<100
≥ 72	-	-	-	-	0	0
≥ 75	-	-	-	-	0	0

Figure 37: Estimated Total Number of People and Dwellings above Noise Levels, $L_{Aeq, 16h}$

NOISE LEVEL (DB)	NUMBER OF DWELLINGS 2016	NUMBER OF PEOPLE 2016	NUMBER OF DWELLINGS 2011	NUMBER OF PEOPLE 2011	NUMBER OF DWELLINGS 2006	NUMBER OF PEOPLE 2006
≥ 54	3,850	9,400	3,300	8,100	3,550	8,900
≥ 57	1,200	2,900	1,050	2,500	1,550	3,700
≥ 60	550	1,300	450	1,100	450	1,200
≥ 63	200	600	200	500	200	600
≥ 66	50	200	50	200	100	300
≥ 69	<50	<100	<50	<100	<50	<100
≥ 72	-	-	-	-	0	0
≥ 75	-	-	-	-	0	0

Figure 38: Estimated Total Number of People and Dwellings above Various Noise Levels, L_{night}

NOISE LEVEL (DB)	NUMBER OF DWELLINGS 2016	NUMBER OF PEOPLE 2016	NUMBER OF DWELLINGS 2011	NUMBER OF PEOPLE 2011	NUMBER OF DWELLINGS 2006	NUMBER OF PEOPLE 2006
≥ 48	3,650	9,000	2,950	7,200	3,000	7,500
≥ 51	1,150	2,800	1,250	2,900	1,500	3,700
≥ 54	500	1,100	450	1,00	450	1,100
≥ 57	200	500	200	500	200	500
≥ 60	50	200	100	200	100	300
≥ 63	<50	<100	<50	<100	<50	<100
≥ 66	0	0	0	0	0	0
≥ 66	-	-	-	-	0	0

ANNEX 11 – SUMMARY PERFORMANCE REPORT OF THE PREVIOUS NOISE ACTION PLAN

Progress against the 62 Action Plan Action in the previous version of the Environmental Noise Directive Noise Action Plan is reported on a quarterly basis to the meetings of the Noise and Track Monitoring Advisory Group. An annual report is also prepared, published online and presented to the Gatwick Airport Consultative Committee.

The layout of the quarterly and annual reports list the Action Plan Action, in the order it is listed in the original Environmental Noise Directive Noise Action Plan, followed by a **Red / Amber / Green** status, an update on the previous reporting period and a plan for the upcoming period.

AS OF JANUARY 2018:

Four Action Plan Actions were identified as RED - Not on track. The rationale behind the rating is in italics beneath each Action Plan Action

30. We will continue to offer a range of contact options for complaints and enquires regarding aircraft noise including by post, email, lo-call voicemail facility and online on the noise website.

GATWICK AIRPORT COMMENT

As recommended by the Independent Review of Arrivals, all complaints are registered online through 'Casper' or by freepost.

37. By the end of 2011 we will review, develop and consult on alternative metrics for describing the impact of aircraft operations during the course of this action plan. We will work and liaise with other UK airports and the Department for Transport on the revised metrics whilst seeking review by Aircraft Noise Monitoring Advisory Committee (UK) ANMAC.

GATWICK AIRPORT COMMENT

As the issue of noise metrics is now being discussed at Government level, at a subgroup of Aircraft Noise Management Advisory Committee (ANMAC), we will continue to play an active role in the Aircraft Noise Management Advisory Committee sub-group (once resumed) as this, and other matters are progressed.

39. We will conduct customer service surveys for the FPT every three years commencing in 2010.

GATWICK AIRPORT COMMENT

This Action Plan Action has been placed on hold indefinitely due to the changes made to complaints handling arising from the Independent Review of Arrivals and the introduction of the Noise Management Board.

53. We will benchmark internationally and publish our ranking in aircraft noise communications with other comparable airports in 2010 and 2013.

GATWICK AIRPORT COMMENT

This Action Plan Action has been placed on hold indefinitely due to the changes made to how Gatwick communicates noise and airspace issues arising from the Independent Review of Arrivals and subsequent activities of the Noise Management Board.

Three Action Plan Actions have been identified as AMBER – Neither on track nor not on track.

19. d) Gatwick Airport Ltd will write to the Department for Transport requesting research be undertaken to fully understand the effects of aircraft noise on human health.

GATWICK AIRPORT COMMENT

The airport is awaiting the outcomes of the World Health Organisation Report on the effects of noise on human health prior to taking any further action regarding this issue.

44. We will publish on our website the night quota period 48dB (A) Leq contour.

GATWICK AIRPORT COMMENT

The annual 2016 noise contours were commissioned by the airport and calculated by the Civil Aviation Authority Environmental Research and Consultancy Department. The airport is in receipt of these and they will be published on the website in February 2018.

45. We will publish annually on our website the summer Leq contours as produced by the Department for Transport.

GATWICK AIRPORT COMMENT

The annual 2016 noise contours were commissioned by the airport and calculated by the Civil Aviation Authority Environmental Research and Consultancy Department. The airport is in receipt of these and they will be published on the website in February 2018.

The remaining fifty-three Action Plan Actions were all found to be GREEN – on track.

FURTHER INFORMATION

To access further information regarding Gatwick Airport's **noise reporting**, please visit <https://www.gatwickairport.com/business-community/aircraft-noise-airspace/noise-reports/fpt-reports/> on these webpages you can view:

- Minutes from the Noise and Track Monitoring Advisory Group
- END Noise Action Plan Annual Report
- Verification of 'Casper' – the Gatwick Airport Noise and Track Keeping system
- Community Noise Studies – as part of Gatwick's Community Noise Monitoring Programme
- Flight Performance Team Annual and Quarterly Reports

The interactive 'Casper' Noise Lab can be found at: <http://noiselab.casper.aero/lqw/>

On our **Sustainability** Pages at <https://www.gatwickairport.com/business-community/community-sustainability/sustainability/> you can view:

- Section 106 Annual Monitoring Reports
- Section 106 / Decade of Change Management Action Plans
- Decade of Change Reports

On our **Noise Management Board** webpages at <https://www.gatwickairport.com/business-community/aircraft-noise-airspace/noise-management-board/> there is a substantial amount of information relating the Independent Review of Arrivals, the Noise Management Board and minutes of meetings, meeting papers and details of studies and analysis undertaken.

ANNEX 12 - COMPARISON OF OLD AND NEW ACTION PLAN ACTIONS

In revising this Noise Action Plan, Gatwick Airport Ltd has decided to undertake a full refresh of the Action Plan Actions therein to ensure they remain relevant as the airport grows.

This table fulfils Gatwick’s obligation to publish details of removed, retained, amended and new Action Plan Actions. The left hand column contains all of the previous Noise Action Plan Actions and the right the retained, amended or new Action Plan Actions.

- **26 previous Action Plan Action have been removed.**
- **The 8 retained Action Plan Actions are in black.**
- **The 18 amended Action Plan Actions are in blue.**
- **The 32 new Action Plan Actions are in green.**

Figure 39: Comparison of old and new Action Plan Actions

Old Action Plan Action	New Action Plan Action
1. We will develop and consult with airlines on policy prioritising airlines operating Chapter 4 aircraft, or equivalent when introducing new business to Gatwick with the aim of increasing the percentage of Chapter 4 or equivalent aircraft operating at Gatwick to 83% by 2015.	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.
2. We will consult with our airline partners on the voluntary phase out of Chapter 3 high aircraft in favour of Chapter 4 or equivalent at Gatwick.	4. 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.
3. We will review the landing fee differential at least every five years commencing in 2010. From 2015 onwards this will be with due regard to CAP 119.	3. We will review the landing fee differential at least every five years.
4. In conjunction with our airline partners we will seek to introduce a ‘fly quiet and clean’ programme. This will rank our airline partners in relation to their overall performance for noise and emissions impacts using metrics such as compliance with abatement techniques, fleet age, engine fit and passenger loads per km. critical to this programme will be the continued delivery of high CDA performance through partnership work with airlines.	5. 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.
4. a) Gatwick Airport Ltd will write to its largest fleet operators of A320 family aircraft seeking their intentions to retrofit A320 family aircraft with vortex generators to eliminate noise created by air passing over the Fuel Tank Pressure Equalisation Vents.	2. We will continue to apply and report upon charging penalties to those aircraft operators of Airbus A320 family aircraft that have not had the Fuel Over Pressure Protector (FOPP) modification retrofitted.

Old Action Plan Action	New Action Plan Action
5. We will continue to promote adherence to the Arrivals Code of Practice and in particular the achievement of Continuous Descent Operations through forums such as the Flight Operations Performance and Safety Committee, the Gatwick Airport Pilots Forum, Sustainable Aviation and other communication events.	13. We will continue to promote adherence to the Arrivals Code of Practice through groups such as Flight Operations Performance and Safety Committee (FLOPSC), Sustainable Aviation and other engagement events.
6. We will continue to promote, monitor, seek to improve and report on adherence to the departure noise abatement procedures detailed in the Gatwick Aeronautical Information Publication. The detail of this is described within the main body of this (END Noise Action Plan) document.	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.
7. We will continue to promote, monitor, seek to improve and report on adherence to the arrival noise abatement procedures detailed in the Gatwick Aeronautical Information Publication. See section six (of the END Noise Action Plan).	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.
8. We will continue to administer the Department for Transport night restrictions regime and ensure that the number of operations at night is within the limits prescribed. We will also be actively involved in the Government night noise consultation in 2010.	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.
9. We will continue to monitor adherence to and review the effectiveness of our ground noise operational controls.	10. We will continue to monitor adherence to and review the effectiveness of our ground noise operational controls.
10. In conjunction with our partners in Sustainable Aviation we will continue to lobby for and seek to support continual improvements in technology and operations towards the ACARE goal of 50% reduction in perceived external noise by 2020 based on new aircraft of 2020 relative to equivalent new aircraft in 2000.	ACTION REMOVED AS GATWICK AIRPORT LTD REMAINS A COUNCIL MEMBER OF SUSTAINABLE AVIATION AND WILL CONTINUE TO WORK WITH THE ALLIANCE THROUGH THE VARIOUS WORKING GROUPS TO ACHIEVE THIS COLLECTIVE OBJECTIVE.
11. We will continue to fine aircraft in breach of the Department for Transport departure noise limits, and we will seek to increase the fining levels with the aim of penalising repeat offenders or departure noise infringements in 2010 and review levels every five years.	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.

Old Action Plan Action	New Action Plan Action
<p>12. We will work with our partners in Sustainable Aviation to develop and promote low noise flight procedures through evaluation of future operational methods and implementation of best practice, e.g., evaluating the feasibility of introducing a steeper approach as part of an international initiative. Gatwick Airport will implement any recommendations resulting from feasibility studies in conjunction with the Civil Aviation Authority and the Department for Transport as and when they are released.</p>	<p>ACTION REMOVED AS GATWICK AIRPORT LTD REMAINS A COUNCIL MEMBER OF SUSTAINABLE AVIATION AND WILL CONTINUE TO WORK WITH THE ALLIANCE THROUGH THE VARIOUS WORKING GROUPS TO ACHIEVE THIS COLLECTIVE OBJECTIVE.</p> <p>THE FUTURE WORKPLAN OF THE NOISE MANAGEMENT BOARD, AGREED ANNUALLY, MAY CONSIDER FEASIBILITY STUDIES WITH THE INTENTION OF INTRODUCING LOW NOISE FLIGHT METHODS. ANY SUCH ACTIVITIES WOULD BE SHARED WITH SUSTAINABLE AVIATION, AS APPROPRIATE.</p>
<p>13. In conjunction with our airline partners and NATS (air navigation services provider) we will undertake a review in 2010 of our stand planning procedures to identify any opportunities to prioritise stand allocation so as to minimise ground noise impacts.</p>	<p>ACTION REMOVED – THIS WORK IS UNDERTAKEN BY GATWICK AIRPORT LTD AS PART OF ITS 'BUSINESS AS USUAL' ACTIVITIES TO ENSURE MAXIMUM UTILISATION OF AVAILABLE RESOURCES WHILE ENSURING THAT GROUND NOISE IMPACTS ARE NOT ADVERSELY AFFECTED.</p>
<p>14. We will make a financial contribution towards the acoustic insulation all eligible properties within the boundary of our new residential noise insulation scheme. This is scheduled for launch in January 2014 and benefits from a larger scheme boundary than in previous schemes.</p>	<p>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.</p>
<p>15. We will request that the Department for Transport review and explore in conjunction with Gatwick Airport the possibility of updating the current departure noise limits.</p>	<p>25. Through engagement with the Department for Transport, Aircraft Noise Management Advisory Committee and/or through unilateral action review our departure noise limits.</p>
<p>16. We will continue to offer households subject to high levels of noise (69dB(A) L_{eq} or more) assistance with the costs of relocating.</p>	<p>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(A) L_{eq} or more) and a large increase in noise (3dB(A) L_{eq} or more), In accordance with the Terms of Reference of the Property Market Support Bond and Home Owners Support Scheme.</p>
<p>17. We will request that the Department for Transport review and explore in conjunction with Gatwick Airport the possibility of updating the current night departure noise limits.</p>	<p>ACTION REMOVED – THIS HAS BEEN SUPERSEDED BY THE AMENDED ACTION 25</p> <p><i>“We will engage with the Department for Transport and the Aircraft Noise Management Advisory Committee to review departure noise limits at Gatwick Airport.”</i></p>
<p>18. We will continue to offer acoustic insulation to other noise sensitive buildings such as schools and hospitals, exposed to medium to high levels of noise (63dB(A) L_{eq} or more).</p>	<p>29. We will continue to offer acoustic insulation to noise sensitive buildings within the 60L_{Aeq} noise contour.</p>

Old Action Plan Action	New Action Plan Action
19. We will request that the Department for Transport review current airspace utilisation around Gatwick.	52. We will participate in all activities relating to ‘LAMP 2’ – 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 structure that has capacity to accommodate forecast traffic levels beyond 2040.
19. a) We will explore the feasibility of providing ‘rotating respite’ to those communities affected by noise from arriving aircraft.	ACTION REMOVED – REFER TO ACTION 31. <i>“In conjunction with the Noise Management Board we will explore innovative methods to reduce both inbound and outbound aircraft noise levels.”</i>
19. b) In conjunction with the London Airspace Management Programme we will explore innovative new methods to control both inbound and outbound aircraft to strive for operational best practice with a view to minimising their impact on the communities below.	31. In conjunction with the Noise Management Board we will explore innovative methods to reduce both inbound and outbound aircraft noise levels.
19. c) We will consult appropriately in respect of actions 19a and 19b.	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.
19. d) Gatwick Airport Ltd will write to the Department for Transport requesting research be undertaken to fully understand the effects of aircraft noise on human health.	ACTION REMOVED AS GATWICK AIRPORT LTD IS AWARE, THROUGH SUSTAINABLE AVIATION THAT THE WORLD HEALTH ORGANISATION IS UNDERTAKING A STUDY THAT WILL DETAIL, AMONG OTHER MATTERS, THE EFFECTS OF AIRCRAFT NOISE ON HUMAN HEALTH.
20. To address the impacts of future growth we will continue to offer acoustic insulation to any residential property which suffers from a medium to high level of noise (66dB(A) L_{eq} or more) and a large increase in noise (3dB(A) L_{eq} or more).	ACTION REMOVED – REFER TO ACTIONS 28 AND 30. <i>Action 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.”</i> <i>Action 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(A) L_{eq} or more) and a large increase in noise (3dB(A) L_{eq} or more), In accordance with the Terms of Reference of the Property Market Support Bond and Home Owners Support Scheme.”</i>

Old Action Plan Action	New Action Plan Action
<p>21. 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(A) L_{eq} or more) and a large increase in noise (3dB(A) L_{eq} or more), In accordance with the Terms of Reference of the property market support bond and home owners support scheme.</p>	<p>ACTION REMOVED – REFER TO ACTION 30.</p> <p><i>“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(A) L_{eq} or more) and a large increase in noise (3dB(A) L_{eq} or more), In accordance with the Terms of Reference of the Property Market Support Bond and Home Owners Support Scheme.”</i></p>
<p>22. We will undertake and publish a feasibility study to assess the potential economic and environmental costs and benefits of operating a runway preference by the end of 2010.</p>	<p>ACTION REMOVED – REFER TO ACTION 31.</p> <p><i>“In conjunction with the Noise Management Board we will explore innovative methods to reduce both inbound and outbound aircraft noise levels.”</i></p>
<p>23. We will continue to engage with our aviation partners through the Flight Operations Performance and Safety Committee to seek to improve adherence to the Aeronautical Information Publication.</p>	<p>18. We will continue to promote adherence to the Departures Code of Practice through groups such as FLOPSC, Sustainable Aviation and other communication events.</p>
<p>24. We will develop a strategy to minimise Auxiliary Power Unit use in order to reduce ground noise and local air quality emissions, and replace with and roll out through 2010. Impacts will be reviewed on an annual basis.</p>	<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>
<p>25. We will publish each quarter on our website the level of adherence with the noise abatement procedures in the Gatwick Aeronautical Information Publication.</p>	<p>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.</p>
<p>26. We will continue to keep abreast of government research and guidance in relation to issues of tranquillity and overflight of Areas of Outstanding Natural Beauty (AONB).</p>	<p>ACTION REMOVED – AONB GUIDANCE CONTINUALLY MONITORED AS PART OF THE AIRPORT’S ‘BUSINESS AS USUAL’ ACTIVITIES. THE LATEST GUIDANCE IS LISTED WITHIN THE 2017 AIR NAVIGATION GUIDANCE.</p>
<p>27. We will continue to engage with local community representatives on air noise through appropriate consultation groups, such as the Gatwick Airport Consultative Committee, Noise and Track Monitoring Advisory Group and the Flight Operations Performance and Safety Committee.</p>	<p>46. We will continue to engage with local communities through the established noise governance groups.</p>
<p>28. We will report on the progress of the (Environmental Noise Directive) action plan to the Noise and Track Monitoring Advisory Group as a standing agenda item.</p>	<p>ACTION REMOVED – REFER TO ACTION 38.</p> <p><i>“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.”</i></p>

Old Action Plan Action	New Action Plan Action
<p>29. We will continue to engage with the Gatwick Airport Consultative Committee on noise management providing quarterly reports of performance and the work of the Flight Performance Team, Noise and Track Monitoring Advisory Group and the Flight Operations Performance and Safety Committee.</p>	<p>ACTION REMOVED – REFER TO ACTION 38.</p> <p><i>“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.”</i></p>
<p>30. We will continue to offer a range of contact options for complaints and enquires regarding aircraft noise including by post, email, lo-call voicemail facility and online on the noise website.</p>	<p>42. We will continue to offer various methods for complaints about aircraft noise events.</p>
<p>31. We will continue to provide public access to flight track information (delayed by 20 minutes) via the online flight tracking facility.</p>	<p>33. We will continue to provide public access 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.</p>
<p>32. We will continue to provide a Flight Performance Team service and implement service improvements where identified. The Flight Performance Team will continue to provide accurate and timely data to aid strategy development and noise complaint handling.</p>	<p>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.</p>
<p>33. We will continue to log all complaints relating to aircraft operations and publish the statistics on our website quarterly.</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>34. We will seek to respond to at least 95% of all complaints and enquiries within eight working days of receipt and publish our performance in Flight Performance Team quarterly reports.</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>35. Through our work with the Noise and Track Monitoring Advisory Group and the Gatwick Noise Monitoring Group we will seek to further develop our community noise monitoring programme to help gain greater understanding of the impacts in communities affected by Gatwick operations.</p>	<p>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.</p>

Old Action Plan Action	New Action Plan Action
<p>36. We will continue to direct all money raised by noise infringements to the Gatwick Airport Community Trust.</p>	<p>ACTION REMOVED – REFER TO ACTIONS 24 AND 26.</p> <p><i>“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></p> <p><i>“We will work with our airlines and noise governance groups to explore the feasibility of introducing supplementary 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.</i></p>
<p>36. a) In conjunction with the Gatwick Noise Monitoring Group and the Noise and Track Monitoring Advisory Group we will continue to commission noise studies to gain an insight into the noise climate in a particular area and we will publish these on our website.</p>	<p>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.</p>
<p>37. By the end of 2011 we will review, develop and consult on alternative metrics for describing the impact of aircraft operations during the course of this action plan. We will work and liaise with other United Kingdom airports and the Department for Transport on the revised metrics whilst seeking review by Aircraft Noise Management Advisory Committee.</p>	<p>39a. We will aim to reach a measure of consensus with community groups on future airport utilisation relative to noise impacts. In order to achieve this we will conduct a review of Government policy including how Government policy should be interpreted and how that policy has been applied in practice. Following the establishment of a workable policy baseline we will aim to develop new noise metrics and reporting to complement the current noise contours and measure our future noise performance. This work will be used to more precisely describe outcomes to support this END Noise Action Plan.</p>
<p>38. We will continue to engage with local community representatives on ground noise issues through the ground noise agenda item of the Noise and Track Monitoring Advisory Group.</p>	<p>ACTION REMOVED AS THE GROUND NOISE REPORT ISSUED BY AIRSIDE COMPLIANCE IS A STANDING AGENDA ITEM OF NATMAG.</p>
<p>39. We will conduct customer service surveys for the FPT every three years commencing in 2010.</p>	<p>ACTION REMOVED – INDEPENDENT REVIEW OF ARRIVALS EXAMINED GATWICK’S NOISE COMMUNICATION STRATEGIES WITH LOCAL COMMUNITIES AND RECOMMENDED AREAS FOR IMPROVEMENT, ALL OF WHICH WERE ACCEPTED.</p>
<p>40. We will host a local focus forum/seminar every two years, inviting local interest groups and other key stakeholders.</p>	<p>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.</p>

Old Action Plan Action	New Action Plan Action
41. We will commission and publish night forecast contours for ground noise for 2015 in 2010.	39. 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 previous year. - Summer Night 10 year average modal split Leq
42. We will commission and publish summer 16 hour day forecast L _{eq} contours for air noise for 2015 in 2010.	<p>ACTIONS REMOVED – REFER TO ACTION 39.</p> <p><i>“We will update to our website the following noise contours:</i></p> <ul style="list-style-type: none"> • Summer 16 hour day forecast L_{eq} contours for air noise • Night forecast contours for ground noise • Forecast L_{den} contours for air noise • Night quota period 48dB (A) L_{eq} contour”
43. We will commission and publish forecast L _{den} contours for air noise for 2015 in 2010.	
44. We will publish on our website the night quota period 48dB (A) L _{eq} contour.	
45. We will publish annually on our website the summer L _{eq} contours as produced by the DfT.	
46. We will continue to engage with local planning authorities in order to ensure they are well informed about noise issues at Gatwick Airport.	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.
47. We will continue to monitor adherence and review the effectiveness of our ground noise operational controls and publish data in the Noise and Track Monitoring Advisory Group meeting minutes.	11. We will report on a quarterly and annual basis the following: <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 APU runs identified. • The number of aircraft engine runs undertaken.
48. We commit to maintaining a suitable Noise and Track Keeping system to manage noise, track-keeping and to provide an online self-service flight tracking / complaint facility. We will also enhance this service when upgrades become available.	32. We will ensure that our Noise and Track Keeping systems are suitable, relevant and reliable, providing updates as appropriate.
49. We will continually review and amend as appropriate the Gatwick Airport Directives relating to noise management.	<p>ACTION REMOVED – REFER TO ACTION 12.</p> <p><i>“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.”</i></p>
50. We will continue to operate and enhance our Noise Management systems.	<p>ACTION REMOVED – REFER TO ACTION 32.</p> <p><i>“We will ensure that our Noise and Track Keeping systems are suitable, relevant and reliable, providing updates as appropriate.”</i></p>

Old Action Plan Action	New Action Plan Action
51. We will monitor the performance indicators listed within the action plan and where we determine that a discouraging trend is emerging, we will seek to set an annual target to help address it.	ACTION REMOVED – REFER TO ACTION 38. <i>“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 web pages.”</i>
52. We will benchmark internationally and publish our ranking on operational noise management with other comparable airports in 2010 and 2014.	ACTION REMOVED – THE 2015 INDEPENDENT REVIEW OF ARRIVALS EXAMINED GATWICK’S OPERATIONAL NOISE MANAGEMENT STRATEGIES AND RECOMMENDED AREAS FOR IMPROVEMENT, ALL OF WHICH WERE ACCEPTED.
53. We will benchmark internationally and publish our ranking in aircraft noise communications with other comparable airports in 2010 and 2014.	ACTION REMOVED – THE 2015 INDEPENDENT REVIEW OF ARRIVALS EXAMINED GATWICK’S NOISE COMMUNICATION STRATEGIES AND RECOMMENDED AREAS FOR IMPROVEMENT, ALL OF WHICH WERE ACCEPTED.
54. We will participate fully, through groups such as the Aircraft Noise Management Advisory Committee in discussing arrival and departure policies.	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 consultations, engagement exercises and recommendations arising from those activities.
55. We will continue to monitor Government research into the effects of noise on human health where applicable and appropriate we will adopt the findings of any research and adopt the guidelines outlined by latest World Health Organisation reviews.	ACTION REMOVED - World Health Organisation (WHO) GUIDANCE CONTINUALLY MONITORED.
	21. In conjunction with our partners and the Noise Management Board we will adopt a preferred Noise Abatement Departure Procedure.
	22. We undertake to explore opportunities to remove the altitude restrictions on Routes 3 and 4 intended to reduce the noise impact of departing aircraft.
	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.
	15. In conjunction with the Noise Management Board, Gatwick Airport will identify a reduced 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.

Old Action Plan Action	New Action Plan Action
	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.
	17. We will implement agreed recommendations of the Noise Management Board Work Plan solutions that are intended to reduce the noise impact of arriving aircraft.
	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).
	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.
	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.
	26. We will work with our airlines and noise governance groups to explore the feasibility of introducing supplementary 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.
	35. We will improve the availability of, and access to, airspace and noise related data.
	47. We will continue to support the existence of, and engage with a Noise Management Board, the work plan and meeting papers, which will be adequately published to our other noise governance groups and online.
	48. We will continue to engage with and provide noise data as required to local Environmental Health Officers through the Gatwick Noise Monitoring Group.
	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.

Old Action Plan Action	New Action Plan Action
	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.
	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.
	27. We will continue to provide a vortex-damage repair scheme to repair roofs that have been damaged by aircraft vortices.
	9. We will implement a voluntary ban on operations of Quota Count 4 aircraft within the core night period by the end of 2022.
	2a. If additional aircraft or manufacturer specific noise defects which can be rectified by a modification are identified (similar to the FOPP) we will seek to identify, consult and implement corresponding charging penalties.
	24a. We will review and increase the fines currently levelled against airlines which breach departure noise limits with all such monies passed to the Gatwick Airport Community Trust.
	28a We will undertake a review of our acoustic noise insulation programs by the end of 2019. With subsequent reviews considered every 5 years as noted in Action 28.
	37a. We will seek to expand the Community Noise Monitoring Scheme with additional noise monitoring terminals and update the reporting process to include holistic noise reports for the area around Gatwick Airport.

ANNEX 13 – DETAILS OF THE REVISION PROCESS OF THE DRAFT NOISE ACTION PLAN AS COMMUNICATED TO THE VARIOUS NOISE GOVERNANCE GROUPS

REVISION OF THE ENVIRONMENTAL NOISE DIRECTIVE NOISE ACTION PLAN 2019 – 2024

Update dated 7 November 2017 to the Gatwick Airport Consultative Committee, Noise and Track Monitoring Advisory Group, the Noise Management Board, Crawley Borough Council and West Sussex County Council.

BACKGROUND

Under the Environmental Noise (England) Regulations 2006, Gatwick Airport Ltd is required to produce a Noise Action Plan, 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 work plan of the Noise Management Board and our Decade of Change Sustainability Strategy.

Gatwick Airport's first Environmental Noise Directive Noise Action Plan was published in June 2010 and covered the period 2010 - 2015. This action plan was subsequently updated to cover the period 2013 - 2018. This is the third revision to the action plan and has been devised in line with the latest guidance provided to airport operators by the Department for Environment, Food and Rural Affairs (DEFRA).

ROUND THREE CYCLE

On 26 July 2017, Gatwick Airport Ltd received notification from DEFRA that the airport should revise its Noise Action Plan.

In accordance with the published guidance, the purpose of this revised Noise Action Plan is to manage and where possible reduce the impact of noise from aircraft at Gatwick Airport over the five year period from 2019 – 2024, building on the actions of the 2010 – 2015 and 2013 - 2018 action plans.

REVISING A NOISE ACTION PLAN

The current plan should be reviewed and revised to include, as necessary:

- updated details about the airport and its operation;
- the results of the noise mapping completed in 2017;
- the progress made against the actions described in the current Action Plan;
- updated information about relevant legislation and standards;
- updated relevant national and local policies;
- information about on-going actions; and
- information about any proposed new actions.

As Gatwick Airport already has a Noise Action Plan in place, DEFRA has proposed that a relatively light touch “review and revise” updating process is undertaken. This does not preclude the airport from undertaking a more detailed review and update should the need arise.

CONSULTATION

Section 3.4 of the Guidance for Airport Operators on how to revise Noise Action Plans under the Environmental Noise (England) Regulations 2006 (as amended) states, inter alia:

“It is envisaged that once the plan has been revised it will be presented to the Airport’s Consultative Committee for comment, and any other appropriate bodies depending on the extent and nature of the revisions. The Airport Operator should summarise the comments received in the revised plan together with their response to the issues raised.”

COMMENCEMENT OF THE CONSULTATIVE PROCESS

This paper is to be presented to the meeting of the Gatwick Airport Consultative Committee, scheduled to take place on Thursday 9 November 2017. It will then be presented to the subsequent meetings of the Noise and Track Monitoring Advisory Group for discussion and the Noise Management Board for information.

For the avoidance of doubt, 9 November 2017 is deemed to be official commencement of the consultative process. Comments on the draft list of actions to be included in the revised draft noise action plan are required to be submitted to GAL by Friday 2 February 2018.

During this period, feedback will also be sought from Crawley Borough Council and West Sussex County Council, both being the Lead Authorities for the purposes of the Section 106 Memorandum of Understanding with the other Local Authorities whose areas are significantly affected by the activities of the Airport.

The feedback received will be considered by Gatwick Airport Ltd and included in Annex 9 of the main Environmental Noise Directive Noise Action Plan document. A draft of Annex 9, together with the final list of proposed actions, will be presented to the GATCOM Steering Group, scheduled for 22 March 2018, for initial consideration and then reported to the main GATCOM meeting, scheduled for 26 April 2018 for consideration and approval.

RECEIPT OF FEEDBACK

It is anticipated that feedback will be received via:

- The Gatwick Airport Consultative Committee,
- The Noise and Track Monitoring Advisory Group,
- Crawley Borough Council,
- West Sussex County Council.

As mentioned above, this paper will be presented to the Noise Management Board. If the Noise Management Board has any comments on the draft list of actions these will be referred to Gatwick Airport Ltd and also reported to the Gatwick Airport Consultative Committee through the usual report back process of the deliberations of the Noise Management Board.

Should members of the public wish to provide feedback on the Environmental Noise Directive Action Plan Actions then it is proposed they provide these to their Gatwick Airport Consultative Committee Representative in the first instance. Feedback received directly by the airport will be considered and included in Annex 9 of the main Environmental Noise Directive Noise Action Plan document.

GATWICK AIRPORT LTD RESPONSE TO FEEDBACK RECEIVED

As detailed in the guidance to airport operators, Gatwick Airport Ltd will provide appropriate responses to the key themes of feedback received and include these in annex 9 of the main Environmental Noise Directive Noise Action Plan document.

FURTHER ROUND OF CONSULTATION

It was agreed at the meeting of GATCOM on 26 April 2018 that the draft Noise Action Plan, having been updated in response to the feedback received, be presented to the 21 June 2018 meeting of the GATCOM Steering Group for consideration prior to it being presented for a final time to the full meeting of GATCOM, scheduled for 19 July 2018. The effect of this additional stage of consultation is that there has been three stages of consultation; commencing with the circulation of a proposed list of Action Plan Actions, the circulation of an initial draft Noise Action Plan and culminating in the final draft of the Noise Action Plan being presented.

ANNEX 14 – ADDENDUM TO THE 2019-2024 END NOISE ACTION PLAN

POST SUBMISSION DEVELOPMENTS

In the time since this Noise Action Plan was submitted to DEFRA, there have been two key developments that are relevant to the growth and operation of the airport and the Noise Action Plan and therefore warrant inclusion in this annex document.

GATWICK AIRPORT DRAFT MASTERPLAN

As part of the airport planning process - and reflecting industry best practice - Gatwick Airport Ltd creates and regularly publishes a 'masterplan' to show how the airport intends to develop and grow in the longer term. The masterplan also helps to inform the wider regional and local planning process.

The 2018 draft masterplan sets out proposals for the airport's ongoing development and sustainable growth. It explains the latest thinking on how the airport can meet the increasing demand for air travel and provide Britain with enhanced global connectivity. This draft masterplan is also a direct response to the Government's call in June 2018 for UK airports to look at 'making best use of their existing runways'⁷ and this masterplan therefore explores how Gatwick Airport could grow across three scenarios:

1. MAIN RUNWAY: USING NEW TECHNOLOGIES TO INCREASE CAPACITY

In the near term, the airport has explored how deploying new technology could increase the capacity of the main runway, offering incremental growth through more efficient operations.

2. STANDBY RUNWAY: INNOVATIVE PLAN TO BRING EXISTING STANDBY RUNWAY INTO USE

Under its current planning agreement, the airport's existing standby runway is only used when the main runway is closed for maintenance or emergencies. However, the 40-year planning agreement that prevents the simultaneous use of the two runways will come to an end in 2019. The draft master plan sets out for the first time how we could potentially bring the existing standby runway into routine use for departing flights, alongside the main runway, by the mid-2020s.

3. ADDITIONAL RUNWAY: SAFEGUARDING FOR THE FUTURE

While the airport is not actively pursuing the option of a building a brand new runway to the south of the airport - as was suggested through the Airports Commission process – the airport believes it is in the national interest to continue to safeguard this land for the future as part of its masterplan. A period of public consultation and associated public sessions has taken place and in 2019, the airport will publish a final masterplan document which will consider the feedback received during the consultation period.

For the avoidance of doubt, should options two or three be implemented at Gatwick Airport, these would be deemed to be a 'major development' as set out in section 1.11 of the 'Guidance to Airport Operators on how to revise Noise Action Plans under the Environmental Noise (England) Regulations 2006 (as amended)' that states:

“Action Plans must be drawn up by the airport operators and be based on the results of the noise mapping. The Regulations also require the Action Plans to be reviewed at least every five years and revised if necessary and whenever a major development occurs affecting the existing noise situation.”

⁷ <https://www.gov.uk/government/publications/aviation-strategy-making-best-use-of-existing-runways>

For the purposes of clarity, the term ‘major development’ is not defined in the Regulations or the Environmental Noise Directive but it would include, for example, the use of a new runway.

NEW AVIATION STRATEGY

On 17 December 2018, the Department for Transport (DfT) announced that it is seeking feedback on its green paper which outlines proposals for a new Aviation Strategy. The strategy will set out the challenges and opportunities for aviation to 2050 and beyond and will emphasise the significance of aviation to the UK economy and regional growth.

The first step in the process of developing the strategy was the publication of an initial call for evidence in July 2017 on the strategy’s aims and objectives. The government then published a ‘next steps’ document in April 2018 which set out some of the specific issues to be considered as part of the policy development process.

The consultation document, issued on 17 December 2018, forms part of the government’s final consultation on the policy proposals for the Aviation Strategy. It is structured around the original objectives of the strategy, updated to reflect the feedback that the government has received to date on their relevance and priority.

The strategy will focus on:

- developing a partnership for sustainable growth which meets rising passenger demand, balanced with action to reduce environmental and community impacts
- improving the passenger experience, including through technology and innovation, a new passenger charter and action to reduce delays at the border
- building on the UK’s success to establish new connections across the world and create greater choice for consumers.

The consultation document⁸ states that demand for aviation has grown significantly since 2010 and while the government welcomes growth in the sector, it advises that this growth must be sustainable. Achieving this requires a partnership between the government, the regulator, the industry and other interested parties to work within a comprehensive policy framework to better manage the environmental impacts of the sector.

The consultation therefore:

- outlines the government’s preferred approach for developing a framework for sustainable growth and the respective roles for the government and the industry
- makes the case for making the most efficient use of infrastructure, including by considering the system for slot allocation at airports and continuing to support the industry in improving resilience
- describes the approach being taken to modernise airspace to deliver capacity and environmental benefits
- sets out a robust policy framework and package of measures to reduce the harmful effects of aviation on the environment, such as carbon emissions, air quality and noise
- sets out the government’s expectations that communities living close to airports should benefit directly from growth.

The consultation period is scheduled to run until 11 April 2019. A final white paper version of the aviation strategy will be published by the middle of 2019.

⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765253/aviation-2050-web.pdf

ANNEX 15 – ADOPTION OF THE 2019 – 2024 END NOISE ACTION PLAN



Dr Thérèse Coffey MP
Parliamentary Under Secretary of State
for the Environment

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Lee Howes
Airspace and Environmental Performance Manager
Gatwick Airport
Horley
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RH6 0NP

11 February 2019

Dear Mr Howes,

EU ENVIRONMENTAL NOISE DIRECTIVE (2002/49/EC): ADOPTION OF ROUND 3 AIRPORT NOISE ACTION PLAN

I am writing to inform you that I have formally adopted the Noise Action Plan for Gatwick Airport, as required by the Environmental Noise Directive and the Environmental Noise (England) Regulations 2006 (as amended).

In line with the updated guidance for airport operators on revision of airport Noise Action Plans, I am formally requesting that the final plan be published in an electronic format within 28 days.

The action planning process has provided a valuable opportunity for airports to bring together all their noise management activities into one living document. As living documents, the plans must be reviewed and, if necessary, revised with the participation of the public, whenever a major development occurs affecting the existing noise situation, and at least every five years.

Yours sincerely,

A handwritten signature in blue ink that reads 'T. Coffey'.

DR THERESE COFFEY MP

Issued by Gatwick Airport Ltd
Corporate Affairs, Planning and Sustainability
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YOUR LONDON AIRPORT
Gatwick

www.gatwickairport.com/noise

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