

GATCOM STEERING GROUP

25 JANUARY 2018

REVIEW OF END NOISE ACTION PLAN 2019-2024

REPORT BY SECRETARIAT AND TECHNICAL ADVISER

SUMMARY

This paper gives details of GAL's consultation on the proposed list of actions to be included in the draft reviewed Environmental Noise Directive (END) Noise Action Plan (NAP) and seeks comments on the suggested draft GATCOM response to the consultation. GATCOM is asked to consider and agree the suggested response and comments on GAL's proposed list of actions set out in Appendix 1.

1. INTRODUCTION

1.1 As reported at the last meeting of GATCOM, Defra has requested that GAL undertake a light touch review of the Environmental Noise Directive (END) Noise Action Plan (NAP). GAL has commenced the review process as required by Defra's guidance on how to revise the NAP and a period of consultation is now underway with interested parties on the proposed list of actions to be included in the draft revised END NAP. The consultation period on the draft plan closes on Friday 2 February.

1.2 GAL presented the [proposed list of actions](#) to be included in the draft revised END NAP to the last meeting of GATCOM and members were asked to provide comments to the Secretariat for initial consideration by the GATCOM Steering Group. The comments received from members were considered by the Steering Group at its meeting on 4 January. The proposed list of actions was also discussed at the meeting of the Noise Management Board on 11 January when the community noise groups raised concerns about the intended effectiveness of the END NAP and the need for the actions to be more measureable and outcome based.

1.3 The Technical Adviser and the Secretariat have reviewed the proposed list of actions, taken into account the comments of the GATCOM Steering Group and considered the concerns of the community noise groups. GAL's draft list of actions together with the suggested a draft response to GAL are set out in Appendix 1 for consideration.

1.4 GATCOM is asked to consider and agree its response to GAL's consultation.

2. PROPOSED DRAFT LIST OF ACTIONS

2.1 The END noise action planning process is designed to assist in the management of aircraft noise and to address the effects arising from aircraft departing from and arriving at airports based on the results of the strategic noise mapping undertaken by Defra every five years. This process supports the Government's aim, as set out in the Aviation Policy Framework (published in 2013) to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise. The purpose of the END NAP should identify whether there are any particular or additional measures that might be taken to meet this aim, including noise reduction if necessary.

2.2 Defra has issued to airport operators guidance on what the review and revision of the END NAP should include. It states that it should include details about the airport and its operation, the results of the noise mapping completed in 2016, the progress made against the actions in the current NAP, updated information about relevant legislation and standards, national and local policies, information about on-going actions and information about any new actions.

2.3 The revised NAP needs to include estimates of the number of people and properties exposed to the different noise bands specified in the END. To ensure consistency across airports and other transport sectors and Defra's reporting to the EU, Defra has provided GAL with an "Airport Noise Action Planning – Data Pack 2017" as it is unlikely that the data used by the CAA (in the production of the noise exposure contours regularly reported to GATCOM) will be the same as that used by Defra.

2.4 GAL's proposed list of actions has therefore been drafted on the basis of the data provided by Defra. The proposed list of actions is reproduced in Appendix 1 together with an additional column containing the suggested responses of the Technical Adviser and Secretariat which take into account the comments of the GATCOM Steering Group for GATCOM's consideration. The commentary at the beginning of the list of actions also addresses some of the concerns expressed by the community noise groups at the Noise Management Board meeting on 11 January.

2.5 To assist members' understanding, some of the data that has been provided by Defra for 2016 - the LAeq, Lnight and LDEN figures - is set out in Appendix 2 together with comparisons of the noise data from the strategic noise mapping exercise in 2006, 2011. Comparisons of the contour maps have not been provided for the purpose of this paper as they cannot easily be compared given the scale of the maps provided for the current exercise and previous exercises. It is disappointing however that the data provided by Defra only includes the numbers of dwellings and people within the noise contours and does not include the area covered by the various noise contours. It is the area covered by the noise contours that provides a more accurate measure as to whether the size of the noise contour has increased over a period of time. As members are aware over the past decade the population and the rate of housebuilding in the area has grown significantly. This was an issue which featured in the Arrivals Review when it became clear from feedback from local authorities and other organisations that other unrelated obligations from Government, for example to increase housing stock or to identify land for a new school or hospital, meant that effective use of land use planning tools in this context was extremely difficult to achieve and has resulted in development taking place in areas within the noise contours. This issue was discussed in detail at the NMB's Local Planning Authority Workshop held on 10 November 2016.

2.6 The data on the area covered by noise contours is however available in the annual noise exposure contour reports prepared by the CAA's ERCD (produced following noise monitoring over a 16 weeks period during the busy summer months) which have revealed for the 57dBA "actual" noise contour:

- 2010 – decrease of 3% in the area – due to traffic decline at Gatwick
- 2011 – increase by 2%
- 2012 – increase by 2% - due to higher number of Airbus A320
- 2013 - decrease by 1% - due to reductions departures of Airbus A320c and higher than usual number of easterly movements
- 2014 – increase by 3% - due to higher number of movements as well as the ADNID departure route trial
- 2015 – increase of 1% - due to increase in movements

2.7 At the time of issuing this report, the 2016 noise exposure contours had not yet been published.

3. COMMENT

3.1 The draft list of actions address a wide range of issues associated with the airport's operation in terms of the impact of aircraft noise for both arrivals and departures and airport ground noise. Many of the proposed actions can be supported as they provide clear commitments from GAL over the longer term to manage the noise impact around Gatwick. The END NAP forms part of a suite of documents prepared by GAL (the suite comprising the END NAP, the Section 106 agreement, the Decade of Change strategy, the NMB work plan and the Flight Performance Team's Quarterly and Annual reports), and is viewed as the overarching statutory, strategic, plan that sets out how GAL will address and manage the noise climate around Gatwick over a five year period. Defra sets out the process for the END NAP review and the Secretary of State is required to approve the final END NAP.

3.2 As the NMB's annual work plan is very much concerned with driving forward the consideration of new initiatives to develop measures to help improve the noise climate over the shorter term and within the policy framework provided by the Government, and NATMAG has a key role in the day to day monitoring of noise and track keeping issues and investigating new issues and trends arising from noise complaints, it is appropriate for those groups' work to be referenced in the END NAP list of actions. It is the work of these groups and that of GATCOM that seek to find local solutions to local problems.

3.3 The GATCOM Steering Group gave initial consideration to GAL's proposed list of actions and the form of GATCOM's response to GAL's consultation at its meeting on 4 January. The Steering Group was presented with the full response from the environmental and amenity groups' representative (collectively submitted by GACC and the NMB community noise groups – attached at Appendix 3) and was specifically asked whether the proposed list of actions was fit for purpose.

3.4 Overall, members agreed that the draft list of actions addressed a wide range of issues associated with the airport's operation in terms of the impact on noise for both arrivals and departures and airport ground noise. The Steering Group agreed the suggested comments of the Technical Adviser, particularly those comments relating to Actions 9, 39 and 39a, all of which related to night flights.

3.5 In addition to this the Steering Group was asked to identify certain actions that GAL should treat as a priority, to be taken forward early in the plan period. Members identified action 25 - review of departures noise limits - GAL to seek to introduce its own lower limits if the DfT would not support a change, and actions 9 and 39 and 39a mentioned above.

3.6 The Steering Group was also concerned about the amount of housebuilding and development taking place in areas close to the airport, particularly in those areas that fell within the noise exposure contours which will automatically result in increases in the number of people/households exposed to aircraft noise. Members have therefore suggested that GATCOM writes to the Government to express concern and to seek a more joined up policy on housing, planning and noise.

3.7 At the meeting of Gatwick Noise Management Board on 11 January, the community noise groups outlined their concerns about the proposed draft list of actions, echoing the comments made in their letter attached at Appendix 3, which then led to further discussion on response the community groups had received from the Minister for Aviation on concerns about traffic growth and noise (see also paragraphs 5.4 – 5.9 of the report of the GATCOM Steering Group at agenda item 4). GAL has given a commitment to the NMB to establish measures to link traffic growth to noise impacts but this is a complex issue. GAL has undertaken a detailed assessment of the government's aviation noise policy, its compliance requirements and Gatwick's performance relative to the policy requirements and is now exploring preliminary options for potential airport utilisation/noise performance metrics. Given the importance of this work it is suggested that it is reflected in the END NAP and a new additional action, to be treated as a priority, has been suggested – Action 31a.

3.8 GATCOM is asked to consider and agree its response set out in Appendix 1.

4. THE NEXT STEPS

4.1 The deadline for responses to the proposed list of actions for inclusion in the revised draft END NAP is Friday 5 February. GAL will then review the responses it has received from consultees and other interested parties and will update the list of actions as appropriate for inclusion in the draft reviewed END NAP. The full reviewed draft document will then be reported to GATCOM at its April cycle of meetings for review and final comment. The full document will include an annex setting out the responses received as a result of its consultation on the draft list of actions with a comment as to how the comments have been addressed.

4.2 GAL is required to submit the final draft END NAP to Defra by Friday 31 August 2018.

RECOMMENDED

That, subject to the comments raised at the meeting, the suggested response to GAL's consultation on the draft list of actions for inclusion in the review of the END NAP as set out in Appendix 1 be agreed.

**PAULA STREET
SECRETARIAT**

REVISED DRAFT END NOISE ACTION PLAN

CONSULTATION ON THE DRAFT LIST OF ACTIONS - SUGGESTED GATCOM RESPONSE

General Overview

The opportunity to consider and comment on the draft list of actions for inclusion in the revised END Noise Action Plan (END NAP) to cover the period 2019 – 2024 is welcomed. GATCOM notes that Defra only requires a “light touch review” of the current END NAP but the Committee is pleased to note that from the 53 proposed list of actions, 27 are new actions which reflect the different circumstances and impacts arising from the airport’s current operation.

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

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

Proposed Actions

The proposed actions are supported as they provide clear commitments from GAL over the longer term to manage the noise impact around Gatwick. However, it is important that the actions are outcome based and measurable. As currently drafted the wording of some actions does not clearly provide an indicator to satisfactorily measure success of delivering improvements to the noise climate. For example, Action 31 is the implementation of new initiatives but how will the success of the implementation of new initiatives be measured? GATCOM therefore requests that GAL reviews the wording of the actions to ensure they are outcome based and/or measurable.

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

GATCOM acknowledges the concerns of local communities about the need for GAL and the industry to address the impact of incremental traffic growth on the noise climate. To help give confidence to communities that GAL is actively and seriously addressing this concern and to pick up a new work stream of

the NMB, the Committee suggests an additional action – new Action 31a. The inclusion of this action will bring into the END NAP process GAL’s work to identify noise metrics and reporting which will enable the airport’s growth and noise reduction performance to be more robustly measured and tracked.

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

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

GATCOM looks forward to having the opportunity to consider the Final Draft Reviewed END NAP before it is agreed for submission to Defra.

DRAFT

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

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

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

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

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

Proposed Environmental Noise Directive Action Plan Actions 2019 – 2024

ACTION	IMPACT	TIMESCALE	PERFORMANCE INDICATOR	
QUIET FLEET				
1. We will maintain a charging differential in our published airport charges which incentivises the use of aircraft with the best in class noise performance.	Arrivals, Departures and Ground	On-going	Track fleet mix including % of Chapters 4 and 14 aircraft	<i>Publishing the track fleet mix would allow year on year comparison. Could use an index which uses the QC system to calculate average for summer/winter.</i>
2. We will continue to apply charging penalties to those aircraft operators of Airbus A320 family aircraft that have not had the Fuel over Pressure Protector Modification retrofitted.	Arrivals, Departures and Ground	On-going	Percentage of A320 fleet retrofitted or delivered with modification in place	<i>Yes</i>
3. We will review the landing fee differential at least every five years.	Arrivals, Departures and Ground	5 yearly	Publication of landing fees	<i>Or in response to a change of circumstances (i.e. FOPP)</i>
4. In conjunction with our airline partners we will seek to re-introduce, by the end of this Noise action Plan period a programme that will rank our airline partners in relation to their overall performance for a range of noise and emissions impacts potentially including, but not limited to metrics such as compliance with abatement techniques, fleet age, engine fit and passenger loads per km.	Arrivals, Departures and Ground	2019 (part of NMB 2017/18 workplan)	Publication of Quiet and Clean Gatwick League Tables	<i>This is welcomed but the focus should be to encourage the less good performers to keep up with the good performers.</i>

<p>5. Gatwick Airport Ltd will consult with its airline partners annually regarding the Airport Charges Structure. The Noise Management Board will also be asked for its feedback.</p>	<p>Strategic Approach</p>	<p>Annually</p>	<p>Publication of annual aeronautical charges and Airline / Noise Management Board participation</p>	<p>Yes</p>
<p>NIGHT TIME OPERATIONS</p>				
<p>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.</p>	<p>Arrivals and Departures</p>	<p>On-going</p>	<p>Publication of night time flying reports</p>	<p>Yes</p>
<p>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).</p>	<p>Arrivals</p>	<p>Quarterly / Annually</p>	<p>Publication of statistics to the Noise and Track Monitoring Advisory Group</p>	<p>Yes</p>
<p>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.</p>	<p>Arrivals and Departures</p>	<p>On-going</p>	<p>Publication of statistics to the Noise and Track Monitoring Advisory Group</p>	<p>Yes but also suggest include reference to reporting to FLOPSC</p>
<p>9. We will implement a voluntary ban on operations of Quota Count 4 aircraft within the core night period by the end of 2024.</p>	<p>Arrivals and Departures</p>	<p>2024</p>	<p>Implementation of such a ban Quota Count 4 aircraft are already subject to a scheduling ban in the night period</p>	<p><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></p>
<p>GROUND NOISE CONTROL</p>				
<p>10. We will continue to monitor adherence to and review the effectiveness of our ground noise operational controls.</p>	<p>Ground</p>	<p>On-going</p>	<p>Performance tracked through quarterly meetings of the Noise and Track Monitoring Advisory Group (Ground Noise Standing Agenda item) Statistics reported annually in the Section 106 Annual Monitoring Report</p>	<p>Yes</p>
<p>11. We will report on a quarterly and annual basis the following:</p> <ul style="list-style-type: none"> • Fixed Electrical Ground Power availability. • The amount of Ground Power Unit dispensations granted. • The number of audit checks of aircraft auxiliary power unit running. • The number of non-compliances of aircraft auxiliary power unit runs identified. • The number of aircraft engine runs undertaken. 	<p>Ground</p>	<p>On-going</p>	<p>Performance tracked through quarterly meetings of the Noise and Track Monitoring Advisory Group (Ground Noise Standing Agenda item) Statistics reported annually</p>	<p>Yes</p>

12. We will continue to minimise aircraft auxiliary power unit use in order to reduce ground noise and local air quality emissions via Gatwick Airport Directives and monitoring of compliance.	Ground	On-going	Publication of Gatwick Airport directives pertaining to Auxiliary power unit usage and audit findings reported to the Noise and Track Monitoring Advisory Group	Yes
ARRIVING AIRCRAFT				
13. We will continue to promote adherence to the Arrivals Code of Practice through groups such as FLOPSC, Sustainable Aviation and other engagement events.	Arrivals	On-going	Reports to the Flight Operations Performance and Safety Committee, Noise and Track Monitoring Advisory Group and contributions to Sustainable Aviation publications	Yes
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.	Arrivals	On-going	Adherence to the noise abatement procedures - reported in quarterly and annual Flight Performance Team Reports	Yes
15. In conjunction with the Noise Management Board, Gatwick Airport will identify a low noise arrival procedure which will capture Low Power Low Drag measures and result in a metric which will supplement Continuous Descent Operations as an additional measurable target.	Arrivals	2024	Introduction of such an enhanced procedure and measure which will be included in subsequent reporting	Yes
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.	Arrivals	On-going	Continuous Descent Achievement rates monitored and reported to the Flight Operations Performance and Safety committee (bi-monthly) and to the Noise and Track Monitoring Advisory Group (quarterly) and published online in Flight Performance Team reports	Yes
17. We will implement agreed Noise Management Board Work Plan solutions that are intended to reduce the noise impact of arriving aircraft.	Arrivals	2019 - 2024	Delivery of agreed Noise Management Board Work Plan activities.	Yes
DEPARTURES				
18. We will continue to promote adherence to the Departures Code of Practice through groups such as FLOPSC, Sustainable Aviation and other communication events.	Departures	On-going	Reports to the Flight Operations Performance and Safety committee, Noise and Track Monitoring Advisory Group and contributions to sustainable Aviation publications	Yes
19. We will continue to promote, monitor, seek to improve and report on adherence to the departure noise abatement procedures detailed in the London Gatwick Aeronautical Information Publication.	Departures	On-going	Adherence to the noise abatement procedures - reported in quarterly and annual Flight Performance Team Reports	Yes
20. We have an annual limit of no more than 5% off-track departures. In future, we will compare on an annual basis the	Departures	2019 - 2024	Track keeping statistics	Yes

percentage of off-track departures against the average performance over the previous five years.				
21. In conjunction with our partners and the Noise Management Board we will adopt a preferred Noise Abatement Departure Procedure.	Departures	2019	Adoption of a specific Noise Abatement Departure Procedure	Yes
22. We undertake to explore opportunities to remove the altitude restrictions on Route 3 and 4 intended to reduce the noise impact of departing aircraft noise.	Departures	2020	Opportunities converted into airspace change proposals to implement such changes	Yes
23. We undertake to explore the feasibility of introducing an alternative Standard Instrument Departure routes within our Noise Preferential Routes in order to provide dispersions and / or respite.	Departures	2019 (part of NMB 2017/18 workplan)	Introduction of alternate Standard Instrument Departure routes within the extant Noise Preferential Routes	Yes
AIRLINE SUPPLEMENTARY CHARGES				
24. We will continue to fine aircraft in breach of the Department for Transport departure noise limits with all such monies passed to the Gatwick Airport Community Trust	Departures	On-going	Aircraft noise infringements identified by the airport Noise and Track Keeping system and monies paid to the Gatwick Airport Community Trust	<i>With modern aircraft there is no excuse exceeding the departure limits. A review of the fines should be carried out and they should be set at a level that would far exceed any benefit that maybe gained from exceeding the noise limits.</i>
25. We will engage with the Department for Transport and the Aircraft Noise Management Advisory Committee to review departure noise limits at Gatwick Airport.	Departures	2024	Revision of departure noise limits	<i>GAL could introduce its own lower limits if the DfT will not support a change. Also suggest that the target date is brought forward to 2020.</i>
26. We will work with our airlines and noise governance groups to explore the feasibility of introducing supplementary 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	Departures	On-going	Departure infringements identified by the airport Noise and Track Keeping system and monies paid to the Gatwick Airport Community Trust	Yes
MITIGATION SCHEMES				
27. We will continue to provide a vortex-damage repair scheme to repair roofs that have been damaged by aircraft vortices.	Community assistance scheme	On-going	Applications received for damage repair	Yes
28. We will continue a scheme that helps with the cost of acoustically insulating homes	Community noise mitigation	2019 - 2024	Number of properties receiving insulation assistance	Yes

against the effects of aircraft noise. We undertake to review the scheme every 5 years to ensure it remains appropriate and relevant.	initiative			
29. We will continue to offer acoustic insulation to noise sensitive buildings within the 63L _{Aeq,16hr} Summer noise contour.	Community noise mitigation	2019 - 2024	Number of properties receiving insulation assistance	<i>2014 scheme expanded to include the 60dB LAeq16hr.</i>
30. To address the impacts of future growth we will continue to offer to purchase those properties suffering from both a high level of noise (63dB L _{Aeq,16hr} or more) and a large increase in noise (3dB L _{Aeq} or more), in accordance with the Terms of Reference of the Property Market Support Bond and Home Owners Support Scheme.	Community noise mitigation Initiative	On-going	Applications received for the scheme	<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>
NOISE REDUCTION MEASURES				
31. In conjunction with the Noise Management Board we will explore innovative methods to reduce both inbound and outbound aircraft noise levels. <i>31a Work to identify noise metrics and reporting to support the measurement of, and track the progress of, the NMB work plan and Noise Action Plan initiatives.</i>	Arrivals Departures <i>Arrivals Departures</i>	2019 – 2024 <i>2019-2020</i>	Implementation of any new initiatives as detailed in the Noise Management Board work plan <i>Implementation of noise metrics to start measuring and tracking progress of the airport's noise reduction performance from a base year to be agreed by the NMB</i>	<i>Yes but also include reference to publishing the annual report of the NMB which will list the successes of work programme.</i>
MONITORING AND REPORTING OUR PROGRESS				
32. We will ensure that our Noise and Track Keeping systems are suitable, relevant and reliable, providing updates as appropriate.	Arrivals Departures	On-going	Provision of the Noise and Track Keeping service, including updates where appropriate Feedback from relevant stakeholders	Yes
33. We will continue to provide public access 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.	Arrivals Departures Ground	On-going	Provision of flight track information and noise related material online Feedback from relevant stakeholders	Yes
34. We will continue to provide a Flight Performance Team (FPT) service and implement service improvements where identified. The FPT will continue to provide accurate and timely data to aid strategy development and noise complaint handling.	Arrivals Departures Ground	On-going	Provision of FPT services including but not limited to: <ul style="list-style-type: none"> • Support to NMB initiatives • Noise Abatement Reporting • Ad-hoc Analysis • Night Flight Administration • Complaints Handling 	Yes
35. We will improve the availability of, and	Strategic	2020	Publication of data in the improved format	Yes

access to, airspace and noise related data.	Approach			
36. We will explore the feasibility of introducing an information service for local communities. This could include updates on airport operations, e.g. scheduled northern runway operations, change in runway direction, meteorological information, scheduled number of aircraft movements during the day and night periods, reported thunderstorm activity etc.	Arrivals Departures Ground	2022	Publication of information	Yes
37. We will continue to provide a Community Noise Monitoring Scheme, operated under the supervision of the Noise and Track Monitoring Advisory Group and the Gatwick Noise Monitoring Group.	Arrivals Departures	On-going	Deployment of mobile noise monitoring terminals to locations around the airport as proposed by the Gatwick Noise Monitoring Group and agreed by the Noise and Track Monitoring Advisory Group	Yes
38. We will report progress against the published Noise Abatement Procedures contained within the London Gatwick Aeronautical information Publication and this Noise Action Plan on a quarterly basis to the Noise and Track Monitoring Advisory Group, the Gatwick Airport Consultative Committee and on our webpages.	Arrivals Departures Ground	On-going	Reports produced, published and circulated	Yes
39. We will update to our website the following noise contours: <ul style="list-style-type: none"> • Summer 16 hour day forecast L_{Aeq} contours for air noise • Night forecast contours for ground noise • Forecast L_{den} contours for air noise • Night quota period 48dB L_{Aeq} contour (07:00-23:00) • Summer L_{eq} contours 	Arrivals Departures Ground	On-going	Noise contours published and any emerging trends identified	<i>The Night contours should be for the whole night period (23:00-07:00) rather than the Quota Period (23:30-06:00).</i> <i>'Summer Leq contours' are a repeat of the Summer 16hr Leq contours above</i>
39(a) We will produce updated N60 contours for the night period (and 60dB L_{ASmax} average contours for the most frequent aircraft types (5% or more of total movements) using Gatwick at night (23:00-07:00).	Arrivals Departures	2020	Noise contours published	The 60dB contour equates to an internal noise level of 45dB L_{Amax} with the windows open, which is recognised as the level that will give rise to sleep disturbance. This Action is to help inform the understanding of sleep disturbance on the residents surrounding Gatwick.
MANAGING AIRCRAFT NOISE COMPLAINTS				
40. We will seek to respond to at least 95% of	Arrivals	On-going	Performance tracked	Yes

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.	Departures Ground		through quarterly FPT reports and published online	
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.	Arrivals Departures	On-going	Performance tracked through quarterly FPT reports and published online	Yes
42. We will continue to offer various methods for complaints about aircraft noise events.	Arrivals Departures Ground	On-going	Available options utilised by noise complainants	<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>
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.	Strategic Approach	On-going	Updates to the Complaints Handling Policy	Yes
ENGAGEMENT				
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.	Strategic Approach	On-going	Engagement with Government, the Regulator, Sustainable Aviation and such ad-hoc reviews that may be established and input to the consultations, engagement exercises and recommendations as appropriate	Yes
45. Gatwick Airport will implement relevant recommendations resulting from feasibility studies in conjunction with the CAA and the DfT as and when they are released.	Strategic Approach	On-going	Implementation of recommendations as required	Yes
46. We will continue to engage with local communities through the established noise governance groups.	Arrivals Departures Ground	On-going	Participation with the established noise governance groups	Yes
47. We will continue to support the existence of, and engage with a Noise Management Board, the workplan and meeting papers, which will be adequately published to our other noise governance groups and online.	Arrivals Departures Ground	On-going	Maintenance of the Noise Management Board and delivery of outputs	Yes

<p>48. We will continue to engage with and provide noise data as required to local Environmental Health Officers through the Gatwick Noise Monitoring Group.</p>	<p>Strategic Approach</p>	<p>On-going</p>	<p>Operation of the Gatwick Noise Monitoring Group, circulation of noise data and publication of reports as appropriate</p>	<p>Yes</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>Arrivals Departures Ground</p>	<p>On going</p>	<p>Publication of annual noise studies</p>	<p>Yes</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>	<p>Arrivals Departures Ground</p>	<p>On going (annually)</p>	<p>Hosting of the event</p>	<p>Yes</p>
<p>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.</p>	<p>Strategic Approach</p>	<p>On-going</p>	<p>Quarterly S106 steering group meetings</p>	<p>Yes</p>
<p>FUTURE AIRSPACE CHANGE</p>				
<p>52. We will participate in all activities relating to 'LAMP2' – the redesign of the London Terminal Manoeuvring Area (LTMA) and en-route airspace to eliminate chokepoints, alleviate areas of intensive aircraft concentrations, and to create a structure that has capacity to accommodate forecast traffic levels beyond 2040.</p>	<p>Arrivals Departures Ground</p>	<p>2024</p>	<p>LAMP 2 airspace implemented</p>	<p>Yes</p>
<p>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.</p>	<p>Arrivals Departures Ground</p>	<p>2024</p>	<p>Evidence of community engagement</p>	<p>Yes</p>

**COMPARISONS OF THE NOISE DATA FROM THE STRATEGIC NOISE MAPPING EXERCISE
IN 2006, 2011 AND 2016**

TABLE 1: 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

TABLE 2: 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	1,000	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

TABLE 3: 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

ENVIRONMENTAL NOISE REGULATIONS 2006: NOISE ACTION PLANS

PAPER BY GATWICK NOISE MANAGEMENT BOARD COMMUNITY NOISE GROUPS AND GACC

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”¹.

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.

¹ Consultation Response on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace. October 2017

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*”².

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

² Aviation Policy Framework page 55

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 dBA day contour³ has increased every year, by over 27% in total;
- the area covered by the 57 dBA 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.

³ 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:

1. **The NAP should commit to noise impact outcomes.** It should specify clear, binding, noise impact reductions⁴ 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

⁴ 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.

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. **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.

NOISE MANAGEMENT BOARD COMMUNITY NOISE GROUPS, GACC

15 December 2017