

GATCOM**26 APRIL 2018****REVIEW OF END NOISE ACTION PLAN 2019-2024****REPORT BY SECRETARIAT AND TECHNICAL ADVISER****SUMMARY**

This paper summarises the way in which Gatwick Airport Limited (GAL) has taken into account in the draft reviewed Environmental Noise Directive (END) Noise Action Plan (NAP) GATCOM's comments on the proposed list of actions for inclusion in the reviewed END NAP which was discussed at the last GATCOM meeting. GAL's consultation draft reviewed END NAP document closes on 26 April. GATCOM is recommended to agree its response to the consultation as set out in Appendix 1.

1. INTRODUCTION

1.1 At its last meeting, GATCOM considered its response to GAL's consultation on the proposed list of actions to be included in the review of the Environmental Noise Directive (END) Noise Action Plan (NAP) to cover the period 2019-24. GATCOM agreed the following key points for inclusion in its response:

- A need to establish measures to link traffic growth to noise impacts with agreed workable metrics to assess performance against noise reduction targets and to which GAL may be held to account; and to ensure robust independent monitoring and challenge;
- GAL to review the wording of the proposed actions to make sure they are outcome based and measurable where possible;
- amongst other comments on specific actions, the inclusion of two new actions to address the need to publish updated N60 contours for the night period (new Action 39a) and the NMB's work on developing metrics to measure more effectively GAL's performance in managing the noise climate (new Action 31a);
- Certain actions to be identified as a priority to be taken forward early in the plan period. GATCOM suggested that Actions 9, 25, 31a, 39 and 39a be considered as priorities;
- The NMB's work being the main vehicle through which GAL, working with industry partners and community groups, to take forward noise reduction initiatives;
- The role of NATMAG in the regular monitoring of operational performance and identifying issues to be addressed; and
- The END NAP to remain a feature of the S106 agreement monitoring regime now and into the future.

1.2 The consultation on the proposed list of actions closed in early February. GAL has considered the responses it received and a reviewed [draft END NAP](#) has now been produced which incorporates a number of changes as a result of the feedback received. GAL is now consulting on the full draft document which was circulated to all GATCOM members on 6 March for comment. The closing date for comments is 26 April.

1.3 The Secretariat has sought comments from all GATCOM members on the draft document.

1.4 The GATCOM Steering Group gave initial consideration to the draft document at its meeting on 22 March and discussed the basis of the suggested GATCOM response given the fact that only a couple of comments had been received from members at the time of its meeting. The Steering Group considered how the Committee's comments on the proposed list of actions had been taken in to account by GAL and whilst a number of comments had been addressed the Steering Group remained concerned that GAL had not committed to specifying targets to be achieved and that some of the actions lacked clear indicators. GAL's comprehensive approach to managing the noise climate around Gatwick is supported but the Steering Group recommends to GATCOM that GAL be asked to review its "aims" to make them "targets" which will help drive behaviours to achieve the targets.

1.5 The Steering Group's comments, together with those comments subsequently received from members have been considered in the preparation of GATCOM's suggested response to GAL's

consultation. The suggested draft response is set out in Appendix 1 for GATCOM's consideration and approval.

1.6 GATCOM is also asked to consider whether it wishes to have the opportunity to review the final draft document before it is submitted to Defra for approval.

2. THE NOISE MAPPING PROCESS

2.1 This is the third round of noise mapping undertaken in England for the purpose of the END. In the case of Gatwick, at the request of GATCOM at the time of the production of first END NAP back in 2008, GAL includes in its END NAP actions to manage the noise effects of a ground noise as well as aircraft noise (arrivals and departures). There is no requirement under the provisions of the Directive to address ground noise as part of this process.

2.2 As previously reported to GATCOM, Defra requested that GAL undertake "a light touch" review of the END NAP. The process set out in Defra's guidance issued in 2017 requires airports to produce noise maps in 2017, using data from the 2016 calendar year.

2.3 GATCOM should be aware that Defra has recently clarified in an email to GAL that END NAPs should include evidence that the measures included in the NAP are challenging, objective, quantified (where reasonably practicable), subject to specific timescales, and have taken full account of the views of local communities. It should also be noted that paragraph 1.8 of Defra's 2017 Guidance to airports states "Noise, however, is an inevitable consequence of a mature and vibrant society. People enjoy and benefit from air transport and this benefit manifests itself in terms of business, leisure, the movement of goods and employment. When managing the environmental noise that arises from aircraft, a balance needs to be struck". GATCOM will therefore need to take both these factors into account when agreeing its response to GAL.

2.4 GATCOM's role in the process is:

- To comment on the revised draft END NAP; and
- To ensure that the airport has followed the process set out by Defra in its guidance.

2.5 GATCOM also has a role following Defra's approval of Gatwick's END NAP. As set out in the DfT's guidelines for airport consultative committees, the Government expects committees to monitor the implementation of airports' commitments made under the END NAP. Members will be aware that NATMAG regularly reviews progress with GAL and the GATCOM Steering Group considers GAL's [annual progress report](#) on delivering the END NAP actions and reports its deliberations to GATCOM. The annual progress report for 2017 has yet to be issued.

2.6 The effectiveness of the current NAP has been questioned by the community noise groups (CNGs) represented on the Noise Management Board. They 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. They have also stated that the CAA data shows that the noise environment around Gatwick has deteriorated since the current NAP came into effect. GATCOM is therefore asked to take this into account in its deliberations on the draft reviewed document.

2.7 An extract from the CNGs response to GAL's consultation on the draft document is set out in Appendix 2 for GATCOM consideration as part of its deliberations.

3. REVIEWED DRAFT END NAP 2019-24

3.1 Defra's guidance states that the END NAP 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 and updated information about relevant legislation and standards, national and local policies and information about on-going actions and information about any new actions. The action plan should address those areas near the airport which are affected by noise shown by the results of the noise mapping (effectively those places within the mapped contours i.e. those with noise exposures of 55 dB(A) Lden or more and 50dB(A), Lnight or more as referenced by the Defra guidance).

3.2 Given the information GAL is required to include in the END NAP, it is a very lengthy document but it does give a comprehensive oversight of the way in which the noise climate around Gatwick is managed and the initiatives being taken forward by GAL. GAL is also required to reflect

in the END NAP the comments raised as a result of consultation on the action plan together with its response to the issues raised. This is given in Annex 9 of the draft document.

How GATCOM's comments have been addressed

3.3 A number of the comments raised by GATCOM on the proposed list of actions have been included in the Draft Noise Action Plan but also a number have not been included. The suggested GATCOM response set out Appendix 1 includes a table detailing those actions on which GATCOM submitted specific comments following its last meeting and how they have been addressed by GAL.

3.4 Members will recall that in addition to submitting comments in respect of specific proposed actions, GATCOM's key concern, and also that of the CNGs, was the need for GAL to establish measures to link traffic growth to noise impacts with agreed workable metrics to assess performance against noise reduction targets and to which GAL may be held to account through a robust independent monitoring regime. GATCOM was also keen to ensure that the various actions were outcome based and measurable where possible and that priority was given to those actions that would bring benefits to the noise climate early in the plan period. In respect of the latter point about identifying priorities, members should note that GAL has not attached any priorities in the draft document and has stated that "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."

3.5 GAL has adapted the format of the draft document to take into account the recently clarified advice from Defra (referred to in paragraph 2.3 above) and to address concerns of GATCOM. Several new columns for each action have been introduced. The new columns are listed below:

NOS AFFECTED: This is the estimated area which could benefit from the proposed action and the theoretical number of people in that area.

EXPECTED BENEFIT AND COST; Self-explanatory and is a reasonable inclusion as with all noise control there should be a cost benefit analysis.

'EXPECTED SUPPORT REQUIREMENT'; identifies other organisations or groups to be involved in fulfilling the action.

'AIM'; This is an aspirational 'target'.

Whilst this clearer format is welcomed, it is disappointing that there is still a lack of clear indicators or targets against many of the actions and their potential benefit is unclear. It is suggested therefore that GATCOM requests that GAL reviews its "Aims" to make them "Targets" and consider introducing some overarching targets which will help drive the behaviour to achieve those targets.

3.6 In respect of improving performance indicators, GAL has made the following comment: *"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."*

3.7 The draft document sets out the Key Performance Indicators (KPIs) (Section 16 of the document) that are already published annually through the S106 agreement Annual Monitoring Report and the Flight Performance Team reports. Some of the KPIs are also published within the Decade of Change Annual Report. These are set out in the following table:

Key Performance Indicator	Round 1 2006	Round 2 2011	Round 3 2016
Percentage of Chapter 4 (or equivalent) aircraft	3%	96%	99%
Percentage of Chapter 14 aircraft ⁵	-	-	-
Area inside the 55dBA L _{den} contour (km ²)	94.5km ²	85.6km ²	104.9km ²
Area inside the 48dBA L _{night} night-time (winter & summer seasons combined) contour (km ²)	41.3km ² <small>*2003 figure</small>	34.1km ²	73.2km ²
Area inside the 57dB LAeq 16 hour daytime summer contour (km ²)	46.7km ²	40.4km ²	44.2km ²
Average quota count of aircraft operating during the night quota period (2330-0600)	0.82	0.65	0.59
	Winter 2005/6	Winter 2011/12	Winter 2016/17
	0.71	0.53	0.44
	Summer 2006	Summer 2011	Summer 2016
Number of infringements of the daytime departure noise limit	9	0	0
Number of infringements of the shoulder and night period	2	4	1
Percentage of aircraft achieving a CDO (24 hour period)	81.0%	90.5%	88.6%
Percentage of aircraft achieving a CDO Day / Shoulder period	79.9%	90.2%	88.2%
Percentage of aircraft achieving a CDO during the core night period	89.6%	94%	93%
Percentage of departing aircraft on-track (all routes)	98.2%	97.4%	98.6%
1,000ft Infringements (No.)	11	3	0
1,000ft Infringements (No. below 900ft)	6	1	0
Number of individual callers making noise related enquiries	587	343	2,324
Total noise complaints received	4,791	2,673	17,715
Percentage of noise related enquiries responded to within eight working days	94.5%	98.42%	46.55%

3.8 In addition to the above KPIs a number of 'expected outcomes' have been identified as a way of measurement of the success of the revised END NAP:

- No operations in 2024 by Chapter 3 aircraft.
- At least 80% of aircraft movements by Chapter 14 or equivalent aircraft by 2024.
- Performance against the noise abatement procedures in the UK Aeronautical Information Publication (AIP) will consistently be maintained and where practicable improved against a 2016 baseline.
- No daytime infringements against 94dB (A) daytime departure noise limit.
- 24 hour CDO achievement of no less than 90%.
- Track Keeping of no less than 98%.
- The 48dB (A) 6.5 hour night contour (winter and summer combined) will be within 47km².

However some of these 'expected outcomes' are already being achieved and will just maintain the positive steps already being taken by GAL.

3.9 The removal of all Chapter 3 aircraft is welcome as is the move to 80% Chapter14 aircraft. However the final outcome concerning the 48dB 6.5hr night contour being within 47km² is questioned given the different references in Annex 6 of the draft document which refers to the Local Authority Planning Conditions and the table in Figure 24 which shows that in Summer 2015 and Winter 2016 the combined 48dB L_{eq,6.5hr} contour area was 35.2 km². As night noise is one of the major sources of annoyance for local communities it would be reasonable to expect that this contour area should remain the same at the very minimum and preferably reduced over the next 5 years. It is suggested that this point be included in GATCOM's response to the consultation.

3.10 GATCOM also asked that GAL identify certain actions to be taken forward as a priority early in the plan period to help secure improvements in the noise climate at the earliest possible time. GAL's response to this suggestion is that "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." It is suggested that GATCOM maintains its request to attach priorities to certain actions without circumventing the clear NMB role in helping to agree noise mitigation priorities as part of its work plan which is also captured by the NAP.

3.11 The other comments GATCOM raised in respect of specific proposed actions, GAL's response to those comments and the suggested GATCOM approach in respect of the current consultation are set out in the last column of the table in Appendix 1. GATCOM is asked to agree the proposed responses set out in the table.

3.12 New comments that have arisen in response to the Secretariat's consultation on the draft document relate to the need for remedial plans in the event that an action is found through the monitoring arrangements not to be on track to be achieved within the plan period; the absence of actions to explore respite options for those that suffer the greatest impact of aircraft overflight

below 4000ft, and the perceived reluctance of GAL to pursue the opportunity to explore bespoke, airport-specific arrangements for night flights as advocated in the Government's night flights decision last year. All these points have been incorporated in the suggested GATCOM response set out in Appendix 1.

5. THE NEXT STEPS

5.1 The deadline for responses to the revised draft END NAP is Thursday 26 April. GAL will then review the responses it has received from consultees and other interested parties and will update the draft document as appropriate. Should GATCOM feel that more significant changes are needed to be made to the draft document prior to its submission to Defra for approval, GAL will be asked to present the final draft document to the next cycle of GATCOM meetings. GAL is required to submit the final draft END NAP to Defra by Friday 31 August 2018.

RECOMMENDED

(1) That, subject to comments raised at the meeting, the suggested response set out in Appendix 1 be agreed and submitted to GAL; and

(2) That GATCOM's views are sought on whether it wishes to review the final draft plan at its next meeting prior to its submission to DEFA for approval.

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CONSULTATION ON DRAFT REVIEWED END NOISE ACTION PLAN - SUGGESTED GATCOM RESPONSE

Dear,

GATWICK END NOISE ACTION PLAN 2019 - 2024

1. 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.

2. 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.

3. 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.

4. 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.

5. 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."

6. 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.

7. 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.

8. 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.

9. 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.

10. 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.

GAL’S RESPONSE TO COMMENTS RAISED BY GATCOM ON THE PROPOSED LIST OF ACTIONS

	Action	GATCOM Comment	GAL Response	Suggested GATCOM Approach
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
24.	We will continue to fine aircraft in breach of the Department for Transport departure noise limits with all such monies passed to the Gatwick Airport Community Trust	<i>With modern aircraft there is no excuse exceeding the departure limits. A review of the fines should be carried out and they should be set at a level that would far exceed any benefit that maybe gained from exceeding the noise limits.</i>	No amendment made to Action.	See comments under Action 25
25.	We will engage with the Department for Transport and the Aircraft Noise Management Advisory Committee to review departure noise limits at Gatwick Airport.	<i>GAL could introduce its own lower limits if the DFT will not support a change. Also suggest that the target date is brought forward to 2020.</i>	No amendment made to Action.	Recommend that GAL seeks confirmation from the Secretary of State for Transport whether they can set their own limits over and above those by the Secretary of State. See also the comments in the covering letter. GATCOM also recommends that this action is treated as a priority by GAL.
29.	We will continue to offer acoustic insulation to noise sensitive buildings within the 63LAeq,16hr Summer noise contour.	<i>2014 scheme expanded to include the 60dB LAeq16hr.</i>	Action amended to read: We will continue to offer acoustic insulation to noise sensitive buildings within the <u>60LAeq noise contour</u> .	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	<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 overflowed 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.

	Home Owners Support Scheme.			
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.
39a.		Action recommended by GATCOM: <i>We will produce updated N60 contours for the night period (and 60dB LASmax average</i>	New Action partially included We will conduct a review of Government policy to identify new noise metrics and reporting to	Accept but see comments in covering letter about the need for general overarching targets

		<i>contours for the most frequent aircraft types (5% or more of total movements) using Gatwick at night (23:00-07:00).</i>	compliment the current noise contours and measure our noise performance.	and the need for this to be a priority item.
42.	We will continue to offer various methods for complaints about aircraft noise events.	<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>	Recommendation included in 'AIM': Implementation of a complaints phone line by the end of 2018.	Accept

EXTRACT FROM THE NMB COMMUNITY NOISE GROUP'S COMMENTS ON DRAFT GATWICK NOISE ACTION PLAN 2019-2024

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. *[N.B. For the purpose of reporting to GATCOM not all the appendices are attached. This extract includes the covering overarching paper in response to the draft END NAP document and also the views previously expressed in the covering paper in response to the proposed list of actions.]*

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.

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 reductions¹ 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.
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.

¹ 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.

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.

Additional specific comments

Additional comments on GAL's draft 2019-2024 NAP actions are marked against the individual actions in the table below.

Finalisation of the NAP

We request that there should be full engagement with the CNGs in parallel with the GATCOM NAP discussions planned for March and April 2018.