1. INTRODUCTION

1.1 At the last meeting of GATCOM Bo Redeborn, Independent Arrivals Review Team, gave an overview of the Review Team’s conclusions and recommendations that had been presented to a wide audience of interested parties prior to the last GATCOM meeting. A copy of the presentation slides given at the Review Team’s launch event were circulated to all GATCOM members together with a web link to the Review Team’s report on 29 January.

1.2 The Review Team has put forward 23 recommendations (20 recommendations and 3 aspirations for the future) which has given a basis on which GAL, CAA, NATS and DfT to work together to deliver possible outcomes to help reduce the impact of flight arrivals at Gatwick. The list of recommendations is set out in Appendix 1.

1.3 Following the GATCOM meeting, all members were invited to submit comments on the outcome of the Review and its recommendations to the Secretariat for consideration in the preparation of a possible GATCOM response to the Review.

1.4 One of the Review Team’s recommendations required GAL to publish by 31 March a description of the steps that it intended to take in response to the Review’s recommendations. GAL’s response was published on 31 March and is available on GAL’s website.

1.5 The GATCOM Steering Group met on the same day as GAL published its response. At that meeting the Steering Group considered the suggested response to the Review Team’s recommendations that had been prepared by the Secretariat which took into account the comments that had been received from GATCOM members and their organisations. The Steering Group was pleased that a number of the points raised in the initial suggested GATCOM response (which had been shared with GAL in advance of the meeting) had been addressed in GAL’s detailed response to the Review Team’s recommendations. The Secretariat has since considered GAL’s detailed response alongside the initial draft response and this has been revised and is set out in Appendix 2 for GATCOM’s consideration.

2. OUTCOME OF THE REVIEW

2.1 The Independent Arrivals Review was commissioned by GAL to examine both easterly and westerly arrivals into Gatwick to ensure that everything that can be done to alleviate the problems local communities are experiencing is being done by all parties with responsibilities in relation to the control, management and operation of Gatwick’s airspace. The Review has highlighted a number of areas and practical measures where improvements could be made to deliver a significantly better noise climate for residents living close to Gatwick’s flight paths. The Review Team’s recommendations are set out in Appendix 1.

2.2 Members will note that Recommendation Imm-19 asks GAL to publish by 31st March its response to the Review and an action plan of how it intends to take forward the various recommendations. GAL published its response on 31st March and will outline the detail of its response at the meeting. GAL has welcomed the findings of the review and has published a
detailed response and proposed Action Plan for the implementation of the review's 23 recommendations on its website. GAL is actively seeking feedback from the local community and other interested parties on the proposed action plan and is running a six weeks period of community engagement concluding on 16 May 2016. During this time residents, community representatives and elected representatives have the opportunity to comment on the proposed action plans and influence how they evolve. As part of that engagement GAL is hosting an event on 26 April 2016 to which a wide range of interested parties have been invited to attend, including all GATCOM members.

2.3 Members will also note that GAL has accepted Recommendation Imm-18 to establish a Noise Management Board (NMB) by Summer 2016. Work on setting up the NMB has already begun. It is proposed that the NMB be independently chaired by Bo Redeborn. An outline of the likely membership is set out in GAL’s response which includes representation from GAL, NATS, CAA, ANS, DfT, Gatwick based airlines, the Chairman of GATCOM, two community representatives and two local council representatives. It is also proposed that Graham Lake be the Secretary to the Board. An initial set up meeting of the NMB to consider its draft terms of reference, process and procedure for the constitution has been arranged for 18 May, which the Chairman of GATCOM has received an invitation to attend, with the first full meeting of the NMB scheduled to take place on 21 June.

2.4 Members attention is also drawn to Recommendation Imm-20 which asks GAL to publish a progress report on delivering the recommendations by the end of January 2017 including relevant updates from CAA, NATS and DfT as appropriate. GATCOM is asked to consider what mechanisms need to be put in place for GAL/NMB to regularly report on progress to GATCOM and/or NATMAG.

3. COMMENTS FOR CONSIDERATION

3.1 The Review has addressed a range of complex and competing demands and has put forward a package of common sense recommendations in seeking to find workable solutions to the disturbance suffered by a number of communities around the airport. It is suggested that GATCOM commends the way in which the Arrivals Review Team has conducted this comprehensive review and welcomes the publication of the Review Team’s report and GAL’s detailed response to it. It is also suggested that the majority of the recommendations be supported in principle but that GATCOM highlights the need for further work by GAL, its partners and the NMB to better understand the full implications of the recommendations on the use of Gatwick’s airspace as a whole, including the current impact of aircraft departures, ground noise and how implementation of the arrivals review recommendations will impact on other areas around Gatwick. This is vitally important if the overall aim is to find a fair and equitable distribution of flight paths.

3.2 Following the Secretariat’s call for comments from GATCOM members and their organisations immediately following the last GATCOM meeting, a number of comments/concerns were received. The key points raised by members are summarised briefly below:

- That further work be undertaken on the full implications of the recommendations on the use of Gatwick's airspace as a whole including the current impact aircraft departures.
- Requests for a review of aircraft departures.
- Concern about the implications of changing the ILS joining point in that new areas would be overflown closer to the airport where communities already experience disturbance from aircraft departures.
- Support for the increase in height of CDA procedure.
- Addressing land use planning could be problematic given the lack of guidance on the definition of “significant” and the onset of annoyance.
- As the Gatwick noise contours shrink development takes place closer to the airport thereby bringing residential properties closer to the airport and flight paths.
- Concern that the production of an information booklet to provide reference information on flight routes, terminology and other aspects of the airport operation relevant to communities could deflate the value of housing in areas around the airport.
- Concern about the implications of the change in landing direction on those areas that experience overflight by aircraft departures.
- Concern about the potential for penalties for airlines that have not achieved the A320 vortex generator retrofit prior to the sunset date.
- Frequency of overflight and the noise disturbance need to be addressed.
• Reference to the hours covered by the night period need to be clarified and consistently used.
• Concern that the establishment of the NMB could add another tier of bureaucracy and that it could affect the importance of GATCOM.
• Support for both elected councillors and residents being members of the NMB.
• Clarification needed as to whether the changes to use of arrivals flight paths would require formal consultation.
• Work on an enhanced noise complaints handling policy should be taken forward at the earliest possible time.
• The need to ensure that the requirements of the Data Protection Act are observed in developing greater transparency for the noise complaints handling system so as not to disclose the precise address of a complainant.
• Gatwick holding areas should be relocated to enable holding aircraft to dwell over water rather than over Sussex, and if that is not possible that they should be significantly higher (Aspire-22 refers).

3.3 A number of the comments raised by members are captured in some way in GAL’s detailed response and action plan which is to be welcomed as it gives reassurance that recognition is given to the fact that many of the recommendations concerning operational airspace management require further consideration and analysis in respect of the potential impacts on communities, both positive and negative. Those matters where it is felt that further clarity or consideration is needed are:
• A320 - further clarification is needed on how GAL intends to incentivise airlines to deliver the vortex generator modification. It states on page 4 of GAL’s response that they will “use financial mechanisms to encourage”.
• Change in Landing Direction – whilst it is accepted that GAL’s action plan stated that “the draft protocol will consider and take into account any related impacts”, there needs to be clearer recognition that there could be potential implications for those residents overflown by aircraft departures during the day and then may be faced with disturbance from aircraft arrivals during the night period.
• NMB – the need for the Board to maintain some form of direct dialogue with communities.
• Noise complaints handling policy – GAL’s action plan does not address the Review Team’s further guidance on achieving greater transparency for noise complaints handling system which is of concern (see p71 of Review Team’s report).
It is therefore suggested that these matters be included in GATCOM’s response to GAL.

3.4 As part of the Review, the Team engaged with an extensive range of organisations, individuals, parish/town, district/borough, and county councils, MPs, airlines as well as the other key parties – GAL, NATS, CAA and DfT. The analysis of the feedback received from this engagement has led the Review Team to conclude that the communities’ sensitivity to, perception of and reaction to aircraft noise has increased. As members are aware the causes of annoyance and the need for research to better understand this has been a matter raised by GATCOM to the DfT and CAA on a number of occasions. Members may recall the DfT advised at GAL’s Airspace Change Seminar last year that Defra’s 2014 Survey of Noise Attitudes (SoNA) carried out between October 2014 and February 2015 included questions about aviation noise. The results of this survey are awaited. The DfT, at that time, gave a commitment to report the results of the survey to GATCOM once they are published. It is suggested that the DfT be urged to work with Defra to arrange for the publication of the SoNA results at the earliest possible time.

Noise Management Board (NMB)
3.5 As mentioned above, it is proposed that the NMB be independently chaired by Bo Redeborn and with the membership comprising up to 12 members with representation from GAL, NATS, CAA, ANS, DfT, Gatwick based airlines, the Chairman of GATCOM, two community representatives and two local council representatives. It is also proposed that Graham Lake be the Secretary to the Board. Members should note that GAL is already in the process of setting up the NMB and is currently seeking representation from the key players identified.

3.6 It is suggested that proposed Chairman and Secretary be endorsed. A membership comprising up to 12 members involving the key parties is also considered appropriate to ensure an effective, constructive operation of the NMB and debate. However, GATCOM acknowledges the difficult task of seeking representation from local authorities and community groups. This is a highly sensitive and complex matter in view of the wide range, and in some cases, disparate views
amongst the various local authorities/community groups. There is concern about GAL’s current thoughts on the representation being sought for these groups in that it does not provide the opportunity for all tiers of local authorities to be involved in the selection process.

3.7 It is considered important that all tiers of local authorities are offered the opportunity to collectively nominate representatives to represent the collective views of local authorities whose areas are overflown by aircraft arrivals and departures in a way that between them there is geographical coverage around the airport. Such an arrangement to collectively appoint representatives has been used on a smaller scale in seeking nominations from the Surrey and West Sussex county and district/borough councils for representatives to serve on the Gatwick Area Community Trust which has worked well. It is accepted that extending such an arrangement to a wider group of local authorities further afield is more complex but applying the same principles could assist in the appointment process. GATCOM is therefore asked to consider the suggestion that the principal authorities (county/borough/district councils) to the east of the airport (i.e. in Kent and East Sussex) should come together to appoint one representative to the NMB, and that the principal authorities to the west of the airport (i.e. in Surrey and West Sussex) should do the same. It is suggested that this principle also be used for the local councils (town/parish councils) and community groups’ appointment of their representatives to the NMB. Such a process would help to ensure a good geographical coverage and representation across the Gatwick region.

3.8 It is also felt that in order to provide clarity on the role of the local authority and local community representatives on the NMB that both sets of members agree, and that this is featured in the NMB’s terms of reference, that they represent wider interests than their own patch and that they should actively engage with others to ensure all interests are represented.

3.9 It is also suggested that the representatives from the key parties (CAA, NATS, ATC, DfT and airlines) need to be of a senior level so as to ensure that they can speak with authority to give a clear direction and to enable decisions to be made by the NMB in a speedy manner.

3.10 As regards the appointment of the nominated alternate members, it is felt the alternate member should not be from the same organisation in the case of local authority and local community group representation as the main serving member and that alternate members should receive copies of all the agenda papers for the NMB so that they are kept up-to-date with the work of the Board.

3.11 The objective of the NMB to develop, agree and oversee a coordinated noise management vision and consequent strategies for Gatwick is to be supported. It is essential however that the work of the NMB does not duplicate or replace the work of NATMAG and FLOPSC, as well as GATCOM, but gives oversight and direction to those Groups. There is concern however that GAL’s action plan does not refer to the roles of NATMAG and FLOPSC as all the actions appear to be allocated to the NMB. Whilst it is accepted that the NMB should provide an oversight of airspace/aircraft methodologies, airport efficiencies and unintended or unexpected consequences of noise mitigation initiatives as well as an overview monitoring function of the delivery of GAL’s action plan there are several recommendations that require detailed consideration and analysis which would normally fall to NATMAG to consider. It is suggested therefore that GAL be urged to give consideration to the roles of NATMAG and FLOPSC in finalising the action plan.

3.12 An issue that would merit further consideration is how to maintain a proactive engagement with the various residents’ and community groups across the Gatwick region. It is important that local residents’/amenity groups are given the opportunity to voice their concerns direct with the NMB. It is suggested that the proposal put forward by the Gatwick Area Conservation Campaign for the NMB to hold public forum/seminars two or three times per year be considered by GAL and the NMB as this would facilitate a direct two-way dialogue between the NMB and the various groups.

3.13 Overall GAL’s detailed response and action plan is comprehensive and sets out a clear path for all stakeholders to follow and it is suggested that GATCOM welcome GAL’s response. However there are a few points that require further consideration in the finalisation of the action plan which are set out above. Those comments have been incorporated in the suggested response at Appendix 2. GATCOM is asked to consider and approve the response.
RECOMMENDED

(1) That the Review Team be commended for the way in which the Arrivals Review had been undertaken and that the publication of the Team’s Report be welcomed;

(2) That GAL’s detailed response and action plan be welcomed in that it sets out a clear path for all stakeholders to take forward the various actions;

(3) That, subject to the inclusion of comments of arising at the meeting, the suggested response set out in Appendix 2 be approved and submitted to GAL for consideration before finalising the action plan;

(4) GATCOM writes to the DfT urging the publication of the SoNA results at the earliest possible time; and

(5) GAL be asked:
   (a) to report progress on delivering the package of recommendations to the quarterly meetings of GATCOM Steering Group;
   (b) to advise the GATCOM of the way in which it intends to manage the implementation of changes to flight procedures and of the process to modify such changes if they result in detrimental impact for affected communities.

PAULA STREET
Secretariat
ARRIVALS REVIEW TEAM’S RECOMMENDATIONS

Consolidated Recommendations
Immediate > 12 months

Noise at source

Imm-1
That as an indication of GAL commitment to noise reduction, as a further tangible indication to local communities that the noise impact of the airport is taken seriously and to incentivise an accelerated noise modification by all airlines using A320 family aircraft at Gatwick, GAL should establish an earlier sunset date for unmodified Airbus 320 family aircraft using the airport of December 31st 2017.

Imm-2
That GAL to engage with DfT, consider proposing to the European Commission the establishment of a sunset date of December 31st 2020 for the operation in Europe of Airbus 320 series aircraft without the Fuel Over Pressure Protector (FOPP) cavity vortex generator noise modification.

Land Use Planning

Imm-3
That planning authorities for communities impacted by aircraft noise from Gatwick, coordinate to conduct their own joint review of the application of land use policy in context of Gatwick aircraft noise, with the objective of identifying steps that will enable the increase of its effective use and the improvement of the aircraft noise awareness for existing and potential land users.

Imm-4
That Gatwick develop, publish and maintain with annual updates an information booklet intended for planning authorities, home buyers, estate agents and conveyancing solicitors, to provide reference information on flight routes, terminology and other aspects of the airport operation relevant to communities. NATS and the CAA should also be encouraged to participate, and to verify those elements of the content that reflect their own areas of activity.

Noise Abatement Operational Procedures

Imm-5
That as soon as possible, the altitude for commencement of CDA at Gatwick should be increased from the current 6000 feet to 7000 feet (FL070).

Imm-6
That GAL collaborates with NATS, CAA and airlines, within 12 months, to agree incremental improvements, to the application of CDA procedures at Gatwick.

Imm-7
That GAL work with NATS and CAA to raise the Gatwick CDA commencement altitude to 8000 feet when feasible.

Imm-8
That GAL propose a subsidiary CDA taxonomy which includes the commencement altitude of the procedure, e.g. CDA 6000, be established by the CAA to improve lay understanding and to better benchmark later improvements

Imm-9
That GAL considers proposing to the CAA, the establishment in airspace design criteria, of a minimum distance between arriving tracks for aircraft, to deliver for arrivals; both a meaningful dispersal and an opportunity for respite. This is likely to apply to aircraft before they have joined the final approach track, which for Gatwick will therefore be at 3000 feet or above.
Imm-10  
That GAL explore with NATS the potential for aircraft to be vectored to be established on the ILS at a minimum of 8nm from touchdown outside of night hours, rather than the current 10nm. This adaptation to vectoring methodology should extend the arrival swathe 2nm closer to the airport and increase the arrivals dispersal to more closely emulate the operations prior to the 2013 change. Hence the arrival swathe would normally extend from a minimum of 8nm to 14nm, with aircraft joining on a straight in approach when traffic permits.

Imm-11  
The development, publication and implementation by GAL of an operating protocol to define the occasions when a change of landing direction will be implemented at Gatwick for noise reasons, if weather, safety requirements and other conditions permit. The objective of the protocol being to achieve a more even split of arrivals, and to fragment the otherwise continuous use of one runway direction or another because of long term weather patterns. The impact should be monitored by GAL and the results regularly reviewed by the Noise Management Board (NMB). The target implementation of the protocol should be during 2016 following engagement with airlines, air traffic control and communities.

Operating Efficiency

Imm-12  
That the Gatwick Flight Performance Team introduce a KPI, enabling the monitoring and reporting of the number of flights delayed from planned daytime arrival, into a night movement (after 23:30 local) and that GAL initiate measures to identify and agree steps, including enhanced use of time based operations, with airlines and with the airport’s scheduling committee for implementation within 12 months, to effectively and progressively reduce unplanned night arrivals at Gatwick.

Imm-13  
That within 6 months, GAL and NATS conduct a joint investigation to establish and agree whether the XMAN extended arrivals manager is an effective tool to reduce arrival holding at Gatwick and if so; to agree and publish within 9 months when XMAN can be deployed for Gatwick and what results can be expected.

Imm-14  
GAL and NATS should evaluate the potential efficiency benefits of an earlier implementation of advanced TBS technology (timescale for completion of evaluation within 12 months)

Other

Imm-15  
To better inform stakeholders, independent academic research should be undertaken to validate the reasons why arriving aircraft are often perceived by residents to be lower than in the past and to identify measures to establish the actual facts in a controlled analysis with community involvement.

Community relations

Imm-16  
That GAL allocates additional manpower, as soon as possible, to strengthen the Airport’s Community engagement capability.

Imm-17  
That Gatwick should establish an enhanced complaints policy and fully transparent procedure, as soon as possible, using an on-line form as the primary medium, requiring sufficient detail to allow the location (postcode) of the complainant, the date and time of day of the incident, such that the aircraft in question can be identified and established with the location, to allow empirical data to be developed and analysed so that noise mitigation action can be taken. There should be no limit to the number of complaints per household. For residents not possessing computer access, postal submissions should be accepted, but should be required to contain the basic information outlined above.
Imm-18
The establishment of a Noise Management Board (NMB) by summer 2016, to be operated under independent chairmanship and comprising representatives from each of the institutions able to effect change for Gatwick arrivals, as well as the chair of the Airport Consultative Committee (GATCOM), and both elected council members and residents’ representatives.

Imm-19
That Gatwick should publish not later than March 31st a description of the steps that it is intended to take in response to the arrivals report and which, if any of the recommendations it plans to pursue.

Imm-20
In the interests of improved community relations that; GAL publish not later than January 31st 2017 a report of overall progress towards delivery of the steps recommended in this report, including relevant status updates from CAA and NATS, with where appropriate the basis for any related decisions.

Aspirational

Aspire-21
The adoption of carefully designed routes from the approach holding fixes used for Gatwick, to the ILS final approach tracks, provides real opportunity to reduce noise, to disturb fewer people, to deliver fair and equitable dispersal of noise, and, to deliver well defined respite measures. The London Airspace Management Programme should be developed by NATS and GAL to incorporate alternative proposals, to those published in 2013, as soon as reasonably possible, for consultation, agreement and implementation for Gatwick arrivals.

Aspire-22
That the Gatwick holding areas should be higher, or should be relocated to enable holding aircraft to dwell over water, rather than over Sussex.

Aspire-23
That the requirements specification of any system upgrade to, or replacement of, any sequencing tools must take full account of the need to integrate the AMAN at Swanwick and DMAN at Gatwick, such that they are each fully informed of, and take into account the capacity allocations of both arrival and departure functions.
SUGGESTED RESPONSE TO THE ARRIVALS REVIEW TEAM REPORT AND RECOMMENDATIONS

Overall
1. GATCOM commends the way in which the Arrivals Review Team has conducted this comprehensive review of aircraft arrivals and welcomes the publication of the Review Team’s report. The Review has addressed a range of complex and competing demands and has put forward a package of common sense recommendations in seeking to find workable solutions to the disturbance suffered by a number of communities around the airport. The majority of the recommendations are supported in principle but it is recognised that a number of the recommendations will require further work by Gatwick Airport Limited (GAL) and its partners to better understand the full implications of their effects both positive and negative.

2. GATCOM also welcomes GAL’s detailed response and action plan which is comprehensive and sets out a clear path for all stakeholders to follow. GATCOM particularly welcomes the fact that GAL has accepted or is minded to accept all of the Review Team’s recommendations and has given timeframes in which to deliver the various actions to implement the recommendations. The regular monitoring of the delivery of the action plan and publishing progress is of key importance if communities are to be assured that GAL and the key parties are actively endeavouring to bring forward solutions to help mitigate the disturbance caused by aircraft arrivals. However there are a few points that require further consideration in the finalisation of the action plan which are set out below.

General Comments
3. It is acknowledged that the scope of the review was to consider aircraft arrivals and the recommendations flowing from the review are essentially in respect of improving the noise climate associated with arrivals, it is important that GAL and the other key parties – CAA, NATS, ATC and the DfT - consider the full implications of the recommendations on the use of Gatwick’s airspace as a whole, including the current impact of aircraft departures, ground noise associated with aircraft movements at the airport and how implementation of the arrivals review recommendations will impact on other areas around Gatwick. This is vitally important if the overall aim is to find a fair and equitable distribution of flight paths/noise disturbance.

Airbus A320 Retrofit Programme
4. Incentives to accelerate the noise modification by all airlines using A320 family aircraft at Gatwick by 31 December 2017 is fully supported. However, GATCOM is anxious about the recommended introduction of a penalty for non-compliant aircraft immediately following the sunset date and would prefer GAL to consider other forms of incentives to further encourage airlines to complete their retrofit programme at the earliest possible date ahead of the recommended European Commission’s sunset date. GAL’s action plan currently states that “use financial mechanisms to encourage” airlines to complete the retro-fit but it does not clarify what form of incentives are to be used.

Arrivals Operations
5. GATCOM is aware of the concern expressed by some communities, particularly to the west of the airport, about the recommendation to move the joining point to the ILS from 10 nautical miles to 8 nautical miles which would closely emulate the arrivals operations prior to 2013. Whilst widening the arrivals swathe should be welcomed, GATCOM is concerned avoid the situation where the noise and overflight disturbance suffered by communities is not moved from one area to the detriment of another area and that the implementation of the recommendation does not result in aircraft flying over areas not previously overflown. GATCOM therefore urges GAL and the NMB to consider in more detail the historical arrivals flight path patterns to ensure that no new areas will be subjected to overflight.

Change of Landing Direction
6. The recommendation to develop an operating protocol to define the occasions when a change of landing direction could be implemented at Gatwick is welcomed as an essential step towards providing one form of respite to local communities to both the east and west of the airport. However, it is suggested that one specific reason given, that is, “to achieve a more even split of arrivals” should be treated with caution as arrivals noise cannot be isolated from the total
aircraft noise impact. As an example a scenario can be imagined whereby an area subjected to disturbance from aircraft departures during the daytime becomes one in which that is followed by disturbance from arrivals during the night period due to a desire to achieve only a ‘more even split of arrivals’. Therefore, careful consideration needs to be given to the principle of changing the landing direction.

7. GATCOM therefore urges GAL and the NMB to carefully consider the potential consequences and noise impacts in developing the operating protocol.

**Noise Management Board (NMB)**

8. GATCOM supports the establishment of the NMB to give oversight to a coordinated noise management vision and consequent strategies for Gatwick.

9. The proposal that the NMB be independently chaired by Bo Redeborn and with the membership comprising up to 12 members with representation from GAL, NATS, CAA, ANS, DfT, Gatwick based airlines, the Chairman of GATCOM, two community representatives and two local authority representatives is supported as is the proposal that Graham Lake be appointed as Secretary to the Board.

10. GATCOM acknowledges the difficult task of seeking representation from local authorities and community groups. This is a highly sensitive and complex matter in view of the wide range, and in some cases, disparate views amongst the various local authorities/community groups.

11. It is vitally important that all tiers of local authorities are offered the opportunity to collectively nominate representatives to represent the collective views of local authorities whose areas are overflown by aircraft arrivals and departures in a way that between them there is geographical coverage around the airport. Such an arrangement to collectively appoint representatives has been used on a smaller scale in seeking nominations from the Surrey and West Sussex county and district/borough councils for representatives to serve on the Gatwick Area Community Trust which has worked well. It is accepted that extending such an arrangement to a wider group of local authorities further afield is more complex but applying the same principles could assist in the appointment process.

12. GATCOM therefore suggests that the principal authorities (county/borough/district councils) to the east of the airport (ie in Kent and East Sussex) should come together to appoint one representative on the NMB, and that the principal authorities to the west of the airport (i.e. in Surrey and West Sussex) should do the same. It is suggested that this principle also be used for the local councils (town/parish councils) and community groups appointment of their representatives to the NMB. Such a process would help to ensure a good geographical coverage and representation across the Gatwick region.

13. In view of the limited membership numbers it is important that both sets of members agree, and that this is featured in the NMB’s terms of reference, that they represent wider interests than their personal domestic vicinity and actively engage with others to ensure all interests are represented.

14. GATCOM also suggests that the representatives from the key parties (CAA, NATS, ATC, DfT and airlines) need to be of a senior level so as to ensure that they can speak with authority to give a clear direction and to enable decisions to be made by the NMB in a speedy manner.

15. As regards the appointment of the nominated alternate members, it is felt the alternate member should not be from the same organisation in the case of local authority and local community group representation as the main serving member and that alternate members should receive copies of all the agenda papers for the NMB so that they are kept up-to-date with the work of the Board.

16. The objective of the NMB to develop, agree and oversee a coordinated noise management vision and consequent strategies for Gatwick is to be supported. It is essential however that the work of the NMB does not duplicate or replace the work of NATMAG and FLOPSC, as well as GATCOM, but gives oversight and direction to those Groups. There is concern however that GAL’s action plan does not refer to the roles of NATMAG and FLOPSC as all the actions appear to be allocated to the NMB. Whilst it is accepted that the NMB should have oversight of airspace/aircraft
methodologies, airport efficiencies and unintended or unexpected consequences of noise mitigation initiatives as well as an overview monitoring function of the delivery of GAL’s action plan there are several recommendations that require detailed consideration and analysis which would normally fall to NATMAG to consider. For example Recommendations Imm 5, 6, 7, 10, 11, and 12 are actions in respect of which NATMAG should undertake the detailed consideration/analysis then refer their key messages to the NMB (and GATCOM). GATCOM therefore asks that GAL give consideration to the roles of NATMAG and FLOPSC in finalising the action plan.

17. An issue that would merit further consideration is how to maintain a proactive engagement with the various residents’ and community groups across the Gatwick region. It is important that local residents’/amenity groups are given the opportunity to voice their concerns direct with the NMB. It is suggested that the proposal put forward by the Gatwick Area Conservation Campaign for the NMB to hold public forum/seminars two or three times per year be considered by GAL and the NMB as this would facilitate a direct two-way dialogue between the NMB and the various groups.

Noise Complaints Handling Policy
15. GATCOM fully supports the review of GAL’s noise complaints handling policy as there is an urgent need to restore credibility and public confidence in the complaints handling system. GATCOM therefore urges GAL to commence the review of the policy at the earliest possible time.

16. The way in which noise complaints are logged and analysed is an important feature of the system and it is essential that a complainant can log more than one complaint and more than one reason per event as this will help to provide GAL with a better and more complete picture of the nature of concerns.

17. The Review Team’s suggested further guidance on complaints handling is noted. However, GATCOM has reservations about the suggestion that “Any public user of the system shall be able to see the postcode … of every complaint”. It is questioned whether this would be permissible under the requirements of the Data Protection Act as some postcodes are unique to one property or a couple of properties so it would be possible to deduce whether an individual has complained. GATCOM therefore asks GAL to carefully consider the best means of operating a transparent complaints handling system which protects the identity of individuals.

18. In this regard we feel that all the data, in general terms, should be accessible online and live, with any statistics, tables, graphs and other presentations being automatically generated and presented in real time. Further, complainants should be able to make complaints through a passworded login system and see a summary of their own complaint history.

Aspirations
19. The recommended aspirations are supported but in respect of Aspire-22 GATCOM believes that Gatwick holding areas should be relocated to enable holding aircraft to dwell over water rather than over Sussex, and if that is not possible then aircraft should be held significantly higher in the holding area to achieve noticeable noise reductions for residents.