

Dear Ed,

Thank you for providing a copy of your annual summary. I am responding as co-author of the Gatwick Airport Independent Arrivals Review, which was published in January 2016 and which addresses most of the fundamentals of your points in detail. I am also Secretary to the Noise Management Board and chair of the NMB Workplan Implementation Steering Group at Gatwick, the NMB oversaw the implementation of the Arrivals Review Recommendations. Given that your report takes a view on Gatwick's implementation of these Recommendations, it is appropriate that I respond to ensure that the outcomes are properly represented and that the question of expectations management is taken into account. I have copied this response to those cc'd in your original e-mail and, given that TWAANG has published your report, to ensure that full transparency and balance is served, I have asked that they also publish this response.

Following the Arrivals Review, in which Bo Redeborn and I made 23 recommendations, Gatwick Airport published a [Final Action Plan](#), accepting the report and its Recommendations. Establishing the Noise Management Board (NMB) was one of the early outcomes of this Plan (IMM 18). The NMB includes representatives from all industry, Government and regulatory stakeholders, as well as community representatives nominated by Noise Action Groups, including TWAANG. The full NMB has met formally 14 times in the three years from June 2016, TWAANG has been a community member of the NMB throughout. The NMB in addition has organised workshops, ad-hoc meetings and annual open meetings.

Gatwick has since 2016 published annual reports of progress with the implementation of the Recommendations of the Arrivals Review, and the details of additional actions agreed by the Noise Management Board. The [Gatwick Airport Arrivals review final Report](#) was published in 2017. I appreciate that your latest report involves a good deal of work and acknowledge that you raise some key issues. Unfortunately, your report includes several misleading and inaccurate claims which misrepresent what each Arrivals Review Recommendation (as documented) set out to achieve and, what is achievable. Your report also proposes assumptions, which if implemented would actually risk an increase of noise disturbance.

You have reported progress against the expectations that you have determined, rather than limiting your commentary to what the Arrivals Review or Gatwick actually said, or what Government policy permits, stating that your assertions have been agreed by Gatwick and were promised by the Arrivals Review, neither of which is true.

It is important to be clear that expectations for several outcomes that you set out, are not deliverable for Government policy and regulatory reasons. The Arrivals Review made Recommendations about what could be achieved by the stakeholders concerned – the art of the possible – and, in the narrative of its report, the reasons for these Recommendations were explained.

This response, primarily intended to address the misleading elements of your report, is also to seek your support, should your report be produced again, that any future version takes into account the actual basis on which noise reduction programmes are being advanced including the statutory and policy constraints, rather than a selection of metrics created to serve a community agenda.

I know from our past discussions that you appreciate that noise management issues are often intractable, with established Government policies sometimes being at odds with other policy objectives published by Government departments (for instance Policy for Land Use Planning in relation to aircraft noise, and Policy for new housing targets).

Your report takes a subjective view of the effectiveness of the Recommendations proposed in the Independent Review of Arrivals. The actual progress - against the outcomes foreseen - is clearly and factually reported in the Final Report of the Review released in 2017 (see link above) which describes the outcomes actually achieved, it is a helpful guide. Meanwhile it is useful to look at the actual current status of the Recommendations of the Arrivals Review through today's lens. I have prepared a summary table below which, contrary to your assertion that Gatwick has failed to make significant progress, shows in fact that, all but one of the Recommendations made in January 2016 has been progressed as proposed by the Review, not just by Gatwick, but by all the stakeholders involved, one reason why the CAA has reported that Gatwick's noise contours are reducing¹.

Recommendation Imm- 11 is the implementation exception. This Recommendation, intended to more fairly distribute traffic in conditions of nil wind, was rejected by the NMB because communities were unable to agree that moving traffic around was fair (perhaps an indication of how difficult the agreement of new arrival routes is likely to be). Nevertheless, the Arrivals Review outcomes envisioned and documented in 2016 for the remaining 22 Recommendations, which are described in detail in the [Report of the Independent Arrivals Review](#) have been delivered as expected. Your headline comment that "Gatwick has failed to make any significant progress in the majority of its key 2016 promises" is plainly and factually untrue.

There is of course more work to be done. The completion of the 23 Recommendations, does not mean that noise management initiatives have ceased, as the many NMB reports, as well as Gatwick's own publications make clear. The Government has recently approved Gatwick's proposed [Noise Action Plan](#), which in addition to established noise management topics, includes a number of further NMB collaborative actions identified as areas needing further work. For information, I have included as an Annex the report describing these current activities and their status, this was provided to NMB Members on July 24th.

Summary of status of Arrivals Review Recommendations

Recommendation	Description	Status	Comment
Imm 01	Additional noise fee for A320 series aircraft not FOPP modified	Complete	
Imm 02	GAL proposal to DfT calling for Europe wide FOPP modification of A320 series	Complete	

1

https://www.gatwickairport.com/globalassets/publicationfiles/business_and_community/all_public_publications/aircraft_noise/lgw_2018_annual_contours_report_final.pdf

2

Imm 03	Review of Land Use Planning	Complete	Further work proposed in NMB Workplan
Imm 04	GAL publish a noise booklet for Homebuyers, estate agents and solicitors	Complete	
Imm 05	Increase the altitude of CDA commencement from 6000 ft to 7000 ft	Complete	
Imm 06	GAL to Collaborate with NATS to identify further CDA improvements	Complete	Gatwick is the UK's best performing airport for CDA compliance
Imm 07	Raise the CDA Commencement altitude to 8000 ft when feasible	Task handed to FAS team	Objective included in draft UK Future Airspace Strategy (FAS) plan
Imm 08	GAL propose change to CDA description to improve noise effectiveness of procedure	Complete	UK is now developing a national Low Noise Approach metric for adoption across Europe to deliver improved noise performance of descending aircraft
Imm 09	CAA arrival track design criteria to achieve better noise dispersal	Complete	CAP 1378 published
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.	Complete	Implemented in 2016, on average <20% of arrivals now join the ILS between 8-10nm from touchdown
Imm 11	New runway protocol to more fairly and equitably distribute traffic east and west of the airport	Rejected by NMB	This recommendation would have modestly increased the usage of the easterly runway
Imm 12	New KPI to determine the number of flights delayed into the night period	Complete	Spill over delays are now monitored, but more work needed to reduce delays
Imm 13	Evaluation of XMAN to reduce Arrival bunching	Complete	XMAN is expected to be deployed by NATS for Gatwick arrivals
Imm 14	Evaluation of TBS for Gatwick implementation	Complete	TBS will be implemented by NATS for Gatwick
Imm 15	Academic study on the effects of height perception and outlier aircraft	Complete	Published in 2018
Imm 16	GAL appoint additional personnel for noise management	Complete	Several additional staff and experts
Imm 17	GAL established an enhanced complaints policy	Complete	New Noise and Track Keeping system also deployed

Imm 18	Establish a Noise management Board	Complete	
Imm 19	GAL publish its planned response to the Independent Review of Arrivals	Complete	
Imm 20	GAL publish a report of progress by January 31 st 2017	Complete	
Aspire 21	The adoption of carefully designed RNAV routes to the ILS	Task handed to FAS team	Expected to be part of FAS implementation
Aspire 22	Increase altitude of Holding and relocate over sea if possible	Task handed to FAS team	Expected to be part of FAS implementation
Aspire 23	Integrate AMAN/DMAN for Gatwick	Task Planned	Part of Gatwick/NATS Masterplan

Returning to the issues outlined in your report, there are several areas that I wish to explore further here. With respect to distribution of aircraft approaching runway 26 at Gatwick and their specific dispersal in the Tunbridge Wells area, you make several points for which it is important to set realistic expectations. You assert that:

1. That Government Policy requires a different distribution of traffic

- Aircraft dispersal at Gatwick already complies with all applicable Government policies and with all applicable airspace regulations
- Recommendation Aspire 21 proposes that RNAV tracks be established to provide more predictable respite and dispersal of flights. This remains the GAL objective and is part of the government’s proposed Future Airspace Strategy Implementation - South - (FASI-S) work. This national programme will take *a number of years* to implement, the time taken is in part to meet the statutory consultation requirements of Government, related to Airspace Change Policy

2. That alternative flight paths are available

- The permanent planned redistribution of flights constitutes an airspace change which requires consultation (see above) the introduction of different flightpaths will be associated with the changes proposed in FASI-S. It is important to set realistic expectations in the context of all government policy. You should not expect flightpaths to change until FASI-S has been agreed, that is still a number of years away.

3. That aircraft are too low

- This topic has been analysed in depth over a number of years, a detailed [Height Perception Report](#) has also been published by Gatwick at the behest of NMB. This provides objective, detailed and validated information on actual descent performance. Associated work to address the very small percentage (<3%) of aircraft that are at sub-optimum altitude is underway, Gatwick and the NMB have already done a good deal of work in this area and progressive remedies are expected. However, complete elimination of the issue is also dependent on airspace change. See caveats above

4. That there is a best practice for aircraft altitude on approach and that a 3-degree glide path is the international best practice

- Gatwick already measures the optimum vertical profile specific to its runways and uses that data when assessing noise performance
- There is no international best practice related to aircraft altitude on approach at Gatwick or other airports. Noise recommendations at many airports relate to use by pilots of low power and low drag procedures for the aircraft and, to use of continuous descent where possible. The performance will improve when pilots and air traffic controllers have a more reliable basis to measure actual distance to run for each arriving aircraft, the availability of such a facility is again largely a function of airspace change (envisioned with FASI-S)
- The NMB has prepared a Reduced Night Noise Trial, expected to begin in March 2020, to validate the impact of the use of P-RNAV arrival profiles on the elimination of flights operating below the optimum levels between the arrival holding areas and the extended centreline
- Further changes to make descent profiles more consistent, will require introduction of P-RNAV (3D profiles) which will require the application of airspace change regulations (see above)
- No further significant change in descent profiles should be expected in the short term, Gatwick is already among best performing airports in the UK and beyond, for descent management intended to reduce noise disturbance

5. That angle of descent is a viable metric for assessing aircraft noise

- A three degree angle of descent is not a reliable measure for aircraft noise performance, nor is it a basis with which to ensure that noise is reduced

6. That no discernible shift in aircraft dispersal has been achieved related to pre 2013

- The 2013 shift related to aircraft joining position on the Instrument Landing System (ILS). Until 2013, during the day, aircraft could join the ILS at a minimum of 7nm from touchdown. This was changed to 10nm in 2013 and then to 8nm (7nm was not permitted by CAA) after the Arrivals Review in 2016. The change in 2016 had the expected effect at the ILS with consistently more than 20% of arrivals now joining between 8-10nm. Clearly the change in 2016 has had a measurable impact which is reported each month to NaTMAG. However, the variable location of aircraft – in the swathe - away from the ILS, will continue to be a function of traffic density and weather, and is random, as explained in the

Arrivals Review. Distribution of aircraft away from the ILS is dealt with in Recommendation Aspire 21 (see table above). The issues, are also described in much more detail in sections 1.9 and 2.4 of the report of the Arrivals Review. The aspects described remain valid today

- No further significant change of distribution can be expected until airspace change (through FASI-S) is agreed and implemented, as reported multiple times to NMB and publicly, further change is several years away and contingent upon prior public consultation

7. That new housing is proposed in areas affected by aircraft noise

- The NMB has also concluded that Land Use Planning Policies are ineffective, planners are obliged to meet new housing targets and, absent the availability of development land, are often obliged to grant approvals to meet government's new housing targets, in areas subject to aircraft noise. The NMB is expected to do more work in this area

8. Spill over of flights into the night period (after 23:30)

- Gatwick is a designated airport, it is the Government that establishes designated airport night flight restrictions (not the NMB, nor the airport)

Taking all these issues into account, the areas of focus most likely to yield further improvements to noise performance at airports in the UK, relate to taking advantage of existing technologies to create a more efficient airspace infrastructure – the so-called Future Airspace Strategy Implementation, and more effective application of Land Use Policy. The NMB has acknowledged that airspace change enabling aircraft to be operated in ways that further reduce noise, is the priority which is most likely to unlock the further improvements that all stakeholders are seeking. Your annual report *could* contribute to these objectives by helping communities to appreciate what has been achieved already within the limits of what industry stakeholders have the ability to influence, where any further improvements could be made and, how Government might help to serve that endeavour.

Setting realistic expectations that fairly reflect the policies and laws that we are all obliged to respect is a responsibility for *all* stakeholders, implying as your 2019 report currently does, that industry stakeholders are, to the detriment of communities, guilty of some kind of delinquency, whether it be ignoring policy or legal obligations, is not accurate and does not help serve the noise improvement agenda. I hope that your 2020 report is able to set out a more informed and balanced view, rather than as it does today, attempt to justify why noise should be moved away from a particular community (to the detriment of others).

In the interests of constructive outcomes, I would be pleased to offer advice in future, for any area, where your work references the report of the Arrivals Review, and for which you are assessing what has been delivered, or not, as a result of that work.

Sincerely

Graham Lake 21st August 2019

Annex

Workplan Implementation Steering Group Report

Review of NMB 2019/2020 Workplan Activities

Date: 22 July 2019

1. Introduction

During NMB/14 on 8th May 2019, the NMB reviewed the conclusions of the Sub-Committee's Terms of Reference recommendations for the NMB, and the additional Governance considerations that had been identified in the Committee's letter to the NMB Chair. The NMB was not able to reach a position on the adoption of the Committee's recommendations and the NMB meeting was closed by the Chair, handing the decision on how to proceed further with the NMB to the sponsor, GAL.

Since NMB/14, GAL have informed WISG that it should continue to govern and progress with the NMB Workplan activities, overseen by the NMB Chair and Secretary, while options for next steps for the NMB are considered by GAL in more detail.

This report from WISG provides an overview on progress of the 2019/2020 NMB Workplan activities since NMB/14.

2. Review of 2019/2020 NMB Workplan Activities

Activity 1 - Review and validate the Low Noise Arrival (LNA) Metric

- A Technical Workshop was held on 11th June to discuss study progress and results of the LNA Metric study. CAA ERCD presented three categories of descent performance based on noise data for different aircraft types, and NATS demonstrated a dashboard to illustrate arrival performance at a number of different airports, based on the criteria defined by the CAA. Refinement of the criteria and dashboard was carried out following the workshop and was presented to SA in early July.
- Further work by the CAA is underway, and development of the final report has commenced with expected completion by the end of the year.
- Next steps for the study include validation of the metric. Helios are in the process of scoping out the validation work on behalf of Gatwick Airport, in line with the NMB workplan.

Activity 2 - Reduced Night Noise (RNN) Trial

- A technical workshop was held in early May to discuss technical, procedural and operational aspects of the trial with industry stakeholders, to support continued planning and preparation for implementation in early 2020.
- Formal industry consultation, required under CAP 1616, commenced in late May for 4 weeks, and concluded at the end of June. Helios are currently collating the feedback which will be captured in the Trial Submission Pack.
- Development of a Trial Submission Pack is underway, containing details of the trial engagement, industry consultation, IFP designs, environmental and safety assessments, trial procedures and activity timescales. A meeting will be held in late July with the CAA to discuss and review the format and content of the Trial Submission Pack, to ensure that it aligns with CAA expectations.
- Noise modelling, required under CAP 1616, is underway.
- Noise monitor site selection is ongoing and noise monitor equipment for the trial had been secured, with anticipated deployment expected in August/September.
- Noise monitor equipment has been sourced for the trial and monitor deployment is underway. Indicative sites have been identified to the East of the airport and assessment of sites to the West of the airport is ongoing. Noise monitor thresholds will be identified to ensure that data capture is maximised.
- Indicative routes have been designed to both the Northern and Southern Runway in order to provide a procedure for when the proposed scheduled Main Runway Works begin in Q2 2020.
- The trial is proposed to start in Q1 2020 (no earlier than March 2020).
- Funding for the trial has been secured through Future Airspace Strategy (FAS); Sustainable Aviation (SA) is the trial sponsor.

Activity 3 - Incentivise the use of quieter aircraft

- Helios have conducted a review of the departure noise limits at which fines are levied at Gatwick. A number of draft conclusions and recommendations were presented to Gatwick in June.
- Engagement with airlines and the DfT to develop options is ongoing and is an activity shared with, and reported through, NaTMAG in line with the Noise Action Plan.

Activity 4 - Define FED in an RNAV Environment

- To be scoped.

Activity 5 - Improve departure continuous climb

- This activity will be scoped following presentation of the Departures Review summary and conclusions, conducted by Trax, at the GAL update meeting on 24th July.

Activity 6 - Review of Land Use Planning (LUP)

- Further steps to be scoped.

Activity 7 - Balance growth and noise

- This activity is ongoing and 2019 supplementary noise contours have been commissioned alongside LGW annual contours. It is anticipated that CAA ERCD will provide the Summer 2019 noise contours by Q3 2020.

Activity 8 - Facilitate NMB engagement with Future Airspace Strategy Implementation (South) (FASI(S))

- FASI(S) updates are ongoing through the ACP CAP1616 process. This activity will be further defined following constitution of the second term NMB.

Activity 9 - Strengthen community engagement

- A NMB Communications Working Group is proposed as part of the second term NMB structure to help strengthen engagement. In particular to provide further specification of which information, in what format should be made available to improve consistency and presentation, as well as reflecting new national criteria (as evolving through ICCAN) to ensure transparency and clarity.