

To: Ed Crutchley

Cc: Stewart Wingate, GAL
TWAANG
Andy Sinclair, GAL

30th September 2019

Dear Ed

You have asked for clarification of some of the points made in my response to your 2019 report. I have been away on leave so not able to respond until now. I would like to reiterate the basis on which I have responded to you in my last communication in which I have explained the position, both in the context of the Independent Arrivals Review and the subsequent action by GAL, NATS, Airlines, the CAA and DfT. The Arrivals Review said:

The review has led us to conclude that there are real opportunities to alleviate significantly the noise issues from Gatwick arrivals which have given rise to so many complaints and concerns. These opportunities can be realised to the full only if all of the parties involved work together in new and more effective means of cooperation. We urge everyone involved to agree a programme of action as a matter of urgency and to implement those actions in the same spirit.

Bo and I made 23 recommendations which, in our professional opinion, could alleviate noise disturbance and improve the flow of information related to arrivals at Gatwick. None of the institutions involved (GAL, NATS, CAA, DfT, Airlines or ANS) were obliged to adopt or implement these Recommendations.

GAL published its action plan in June 2016 in which it said:

GAL has accepted all of the recommendations of the Independent Arrivals Review. "The period of community engagement has confirmed that the responses to the findings and recommendations of the Independent Arrivals Review, as well as feedback on the resulting Proposed Action Plan, have been largely positive. Even so, feedback suggested that further analysis was necessary to quantify the full impact of implementation of some recommendations, and to understand better the effects of Recommendation Imm-10 in particular...

..Although the Independent Arrivals Review was commissioned by GAL, other parties including the CAA, NATS, ANS and the DfT, as well as airlines and local Government, have key roles which are identified in the recommendations and in this Final Action Plan. Each of these organisations has cooperated fully in the Independent Arrivals Review and the subsequent engagement process, and GAL looks forward to their continued collaboration and engagement. This will be important for the achievement of the steps recommended as a result".

I explained in my August response to your report, that among my reasons for responding is that, setting community expectations by accurately representing what has been said and agreed, is an important consideration.

The work involved in delivering the Arrivals Review Recommendations has highlighted the simple fact that achieving consistent noise reduction is complex, it requires wide collaboration involving many organisations, each of whom is obliged to operate within a strictly controlled rules-based and legally enforceable system.

I have no doubt that the organisations involved are continuing to take all reasonable steps to reduce disturbance further, certainly as far as their legal and other constraints permit. As a result of this

work, a number of noise reduction and related objectives have been agreed and already implemented, or are in implementation. Equally, I have no doubt that the views you have expressed are honestly held. The challenge, as ever, is to identify and deliver viable mechanisms to reduce noise.

GAL, nor any other of the institutions involved has *promised* or is in a position to *promise* changes or improvements. To report progress, as you do against *promises* that you claim have been made, is misleading readers of your report and is an inaccurate interpretation of both the Arrivals Review and the GAL Action Plan.

A good deal of useful work is still underway, for instance the recently announced upgrade to the GAL Noise Complaints System, undertaken at considerable cost, addresses issues identified in the Arrivals Review and subsequently by the NMB. For the first time at any airport in UK, a resident impacted by Gatwick can now search for aircraft noise events by postcode. Work is also continuing on planning for the Future Airspace Strategy Implementation, which will enable changes that Gatwick believe should reduce noise impact for many people.

I have addressed your specific questions below.

Sincerely

A handwritten signature in black ink, appearing to be 'G. Lake', written in a cursive style.

Graham Lake
30th September 2019

1. Are you suggesting that a 3-degree descent angle (beyond the ILS line) is not relevant to noise perceived at ground level and will not apply to Gatwick?

No, I said that using the 3-degree metric to assess arrivals noise performance is misleading, especially in areas beyond the ILS final approach track. A fixed descent angle at the greater range could, dependent on other factors, either increase or reduce noise. A more sophisticated measure is needed, which is why the Low Noise Approach Metric (See NMB workplan) is being developed.

Use of the 3-degree glide path in official documentation refers to the final approach track (normally the extended runway centreline) and, is a global practice, which is why and how both CAA and NATS refer to it. CAA Publication CAP 1554 provides a relevant description and highlights the noise considerations. The CAP document (and the GAL Action Plan) discusses the role of both continuous descent and of low power low drag. I have not said that the 3-degree descent angle is not relevant to Gatwick, it is used as a standard, but is not in itself (as you imply) a reliable basis to reduce noise beyond the extended centreline of the runway. This is why (as a result of IMM-08) that GAL, NATS, CAA and airlines are working to define a low noise approach metric that can be used as an effective measure of flight profiles that are able to consistently deliver noise reduction.

2. Are you suggesting that (all other factors being equal) lower altitude does not imply more noise perceived at ground level?

As noted above, noise reaching the ground will always depend on the power and drag configuration of the specific flight and aircraft type as well as the aircraft height above the ground and weather conditions. A fixed descent angle may oblige the aircraft to be ineffectively configured for noise reduction purposes.

3. Are you suggesting that (all other factors being equal) a shallower descent angle will not be detrimental to noise perceived at ground level?

See above

“... will increase the arrivals dispersal to more closely emulate the circumstances prior to 2013 change.”(Page 22 of the Final Action Plan),

“This recommendation is intended to reverse much of the aircraft concentration and noise consequences of the approach stabilisation initiative taken by GAL and NATS in 2013, thereby more closely emulating the distribution of arriving aircraft that occurred previously.” (Page 23 of the Final Action Plan).

These statements were addressed to all communities newly affected since 2013 (most of whom had made representations to you and were recipients of the Action Plan), not just those closest to the ILS.

The expected outcomes identified from the Arrivals Review (above) according to objective measures have been achieved, the flight tracks do more closely emulate the circumstances prior to 2013, when compared with the 2013-2016 period, and much of the aircraft concentration and noise consequences of the Approach Stabilisation Initiative has been successfully addressed to the extent permissible by CAA. The Arrivals Review made clear that predictable Fair and Equitable Distribution (FED) of aircraft (in the so-called swathe) is a function of Future Airspace Strategy and cannot be

delivered before its implementation as set out in the Report of the Arrivals Review (Sections 1.9 & 2.4). A viable definition of FED has not yet been achieved, nor has any operating concept for its implementation. The issue remains on the NMB Workplan, but is still likely to be several years away for reason previously explained.

4. With respect to Government Policy regarding community exposure, are you claiming that the original 2013 flightpath changes did not ignore it when exposing tens of thousands more residents to aircraft noise?

I said that: *Aircraft dispersal at Gatwick already complies with all applicable Government policies and with all applicable airspace regulations.*

That was also the case in 2013. However, regulations concerning the planned permanent redistribution of flights have changed since 2013. The minimum joining point changes made in 2013 would probably not now be permitted without the prior application of the Airspace Change Process, which based on the consultation requirements, may or may not permit such a move. This also applies to the Imm-10 changes made in 2016 to reduce the impact of 2013.

5. With respect to my assertion that alternative flightpaths are available during summer night hours for the 25 or so that directly cross Tunbridge Wells, are you saying that 'tromboning' routes, such as daily practiced outside the 'night quota period', and often during it, cannot be more systematically employed so as to avoid population centres?

Yes, again as set out the Report of the Arrivals Review, the methodology, based on the systems and procedures available for use today will continue to result in a random rather than prescribed dispersal of arriving aircraft. This will remain the case at least until FASI-(S) - specifically P-RNAV to the ILS - is implemented. The reasons are described in some detail in sections 1.9 and 2.4 of the Report of the Arrivals Review. The Airspace Change Process, introduced since the Arrivals Review was published, will be an additional consideration in planning and implementing any changes.

6. Are you suggesting that I should have looked at an alternative timeslot to the one I used because the results would have been different?

I did not make any comment on the timeslots you had used. I said that the Government sets the requirements and measures performance on that basis:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/627890/night-flight-restrictions-at-heathrow-gatwick-and-stansted-decision-document.pdf

7. Have you seen anywhere in the report where I have commented on the number itself of night flights as you claim?

I am not clear what you are referring to here. I made only two remarks about night flights, the first related to government role for Gatwick as a Designated Airport, and the second acknowledging that more needs to be done over and above the KPI initiative.