

17TH AUGUST 2020

Peter Barclay
GACC Chair
Campaign Office
Charlwood
RH6 0EG

Dear Peter,

I hope this finds you well.

Thank you for your letter and recent follow up email addressed to Stewart. Stewart has asked that I respond on his behalf. Whilst many of the issues were raised and generally discussed as part of the broader discussion on COVID-19 impacts at the GATCOM Steering Group on 25 June, (see section 2 of the notes) and also raised and covered to some extent at the GATCOM meeting in July, for clarity I have set down below Gatwick's position on each of the specific points made in your letter.

I think it is appropriate that I start by explaining that Gatwick already has and will continue to have noise and environmental improvements contained within its plans. The points that you raise are not new and are already addressed in various ways – either through the various noise management measures currently in place or through our Decade of Change sustainability programme (most recently presented at the July GATCOM meeting). As a team we work hard to improve the Airports environmental performance, whilst at the same time ensuring local residents and the wider region benefits from the substantial economic and employment opportunities the Airport brings.

In addition, and in order to place my response to your points in the current broader context, I will reiterate the points made by Stewart at July's GATCOM meeting. The harsh reality of the effect of the COVID-19 pandemic on our industry is that we continue to see substantial reductions in passenger numbers and recovery to 2019 passenger levels is not forecast to return until 2024. This, of course, will have a dramatic effect, not just on our industry but also on local residents, communities and the local economy and will inevitably lead to more job losses and redundancies at the airport in addition to the hundreds of staff who have already left our business as we adapt to changes in passenger demand. Indeed, those jobs already lost in our business are only a small proportion of the thousands of job losses across the wider Gatwick campus and our industry partners. As a consequence, there will be a significant detrimental economic damage on the local area as well as impacting our ability to deliver some of the changes that we had previously anticipated.

I am pleased to note that the central premise of your letter supports growth at Gatwick delivered in a way that promotes sustainability and includes improvements to noise and environmental performance. I agree

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that this will be important as the industry takes the necessary steps along the road to recovery understanding of course that any 'additional traffic' to which you refer is probably some years away based on our pre-pandemic 2019 traffic levels. We too, support the Prime Minister's aim of "building back better" where businesses are encouraged to grow and have for example noted the Government's recent Manston Airport decision which gave considerable weight to both existing policy of making best use and the economic benefits of aviation.

In your letter you propose a number of actions which the Airport and our airline customers could take now to help minimise the environmental and noise impacts of additional air traffic in the short term as air traffic numbers start to increase again. For the purposes of clarity, I set out below the measures already in place taking in turn the points you raise:

1. *Keep the airport closed at night in order to avoid flights that have the greatest community and health impacts.*

Gatwick is a 24-hour operation. The scheduling of aircraft in the night period is a necessary element of the business model of many of the airlines that fly from Gatwick. We will, of course, continue to operate night flights in accordance with the Department for Transport (DfT) regime for night flight restrictions on air traffic movements and the quota count which encourages the use of quieter aircraft. From our briefings to GATCOM and the Noise Management Board (NMB) you and your members will be aware that this process is closely monitored by the DfT. As was explained at the GATCOM Steering Group meeting, a review of the night flight restrictions regime is expected to commence before the end of the year and we welcome the opportunity to contribute and share the lessons learned from the proactive approach taken by Gatwick in managing night noise.

As part of our commitment to noise management - which is distinct from the DfT's night flight restrictions - the Gatwick scheme of charges applied to night flights already encourages airlines to fly their quietest aircraft. As described in the recently published Gatwick 2019 Noise Exposure Contours the increased use of quieter aircraft during the night period is directly attributed for the reduction in noise impacts during 2019.

2. *Ask airlines to prioritise flying the quietest aircraft in their fleets.*

Measures to incentivise our airline customers to fly the quietest aircraft are in place through the aeronautical charging structures as promulgated in Gatwick's Conditions of Use. Furthermore, there is an obligation that forms part of the S106 Legal Agreement, to "maintain differentials in the charges on aircraft movements at the Airport, subject to any requirements of the Company's appropriate regulator so as to encourage airlines to use quieter and cleaner aircraft types".

You will be aware that in order to incentivise airlines to use the quietest aircraft at Gatwick during the night period we introduced changes to the airline charges regime that applies significantly higher noise charges all year round during the night. With effect from 1 April 2019 the proportion of noise charges collected

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from night flights increased (from 50%) by 5% per annum until 2021/22 when 65% of noise charges will be collected from night flights.

As illustrated by Gatwick's night flight charges regime we have, and will continue to, encourage our airlines to take environmentally friendly choices through our contracts and commitments. This includes building on initiatives such as Gatwick's differential aeronautical charges to encourage the A320 FOPP modification programme.

We will continue to work, and with the NMB, to create a range of means to encourage our airlines to optimise the operation of their aircraft for noise. Initiatives that we have been progressing include: developing an Airline Noise League Table; with cross industry support, a Low Noise Arrival Metric to encourage best in class operation for arrivals; and the development of new noise limits for departing aircraft.

3. *Put in place incentives that encourage airlines permanently to retire older, noisier and more polluting aircraft.*

Over the fleet procurement time cycle there have been significant improvements in the noise performance in airline fleets and it is already in the interests of airlines to continue to do so. For example, in 2008 each aircraft movement generated on average 177m² of noise towards the total 57 dBA Leq noise contour area of 46.7km². If this fleet had still been operating in 2019, then the 280,700 air traffic movements would have given rise to a contour of 49.7km², ie some 28% larger than the 38.7km² area observed last year.

As commercial aviation begins its recovery it is important to bear in mind that aviation noise around Gatwick will begin to return to normal patterns following the extended temporary period of reduced flying. The perception of this noise may be that it is louder or more frequent than before the COVID-19 crisis. This is a distortion brought about by the irregularity of flights throughout the crisis. Indeed, many airlines have brought forward the retirement of older, noisier aircraft. As a result local communities will benefit from some of those changes, for example the withdrawal of the B747 from the Gatwick schedule - there were just over two thousand B747 flights at Gatwick in 2019 - will reduce noise impacts and in particular outlier events, ie those that are noisier than the average flight.

4. *Work with your air traffic control partners to disperse aircraft, achieve higher, quicker, departures and adopt noise-minimising arrival procedures to the maximum extent possible, recognising that airspace will be far less congested. These procedures should be consistent with the arrangements and targets discussed extensively with the previous Noise Management Board (NMB) and their achievement should be reported on regularly.*

Due to the reduced traffic levels, NATS air traffic controllers try to provide optimum routings. This is in line with the CAA approved Manual of Air Traffic Services which asks air traffic controllers to deliver traffic in a safe and expeditious manner. This means that when skies are less busy more direct routings and optimised climb profiles will be used where possible within the constraints of existing noise abatement procedures.

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As presented at GATCOM, NATS air traffic controllers are taking the opportunity to climb aircraft higher more quickly and dispersing the Gatwick traffic on departure by offering more direct routings once aircraft are above the minimum vectoring altitude which is 3000 or 4000ft depending on which departure route is being flown. In the evidence presented at GATCOM using one of the departure routes as an example, this has resulted in higher altitudes being achieved earlier in the climb.

5. *Reconvene the NMB bodies so they can monitor these measures and consider additional initiatives, in line with ICCAN's advice that engagement should continue during this period.*

Since the pause of NMB governance meetings GAL has continued to keep the situation under review and has re-commenced NMB meetings with effect from August. This will include a series of bi-lateral meetings between the NMB Chairs and community representatives ahead of an already scheduled NCF meeting on 23 September followed by a NEX in October.

The NMB bodies form only one part of the noise management and oversight function at Gatwick. Both GATCOM and the GATCOM Steering Group have met and a meeting of the NaTMAG took place on 6 August. Notwithstanding this pause the Airspace Office has continued to exercise its airspace and noise monitoring function responding to enquiries throughout the period. Reporting in relation to noise management requirements, such as night flight restrictions, is executed through the NaTMAG and were presented when the group met on 6 August.

I hope that the above sets out where we already have measures in place to address the points that you have made. Gatwick has over recent years worked hard, and successfully, to reduce noise impacts as shown for example by the latest CAA Noise Exposure contours. Our aim is to continue to deliver reductions to the noise impacts around the airport, however, the new environment for the industry will make the collaborative activities - necessary to deliver effective operational and airspace improvements – even more challenging. Nevertheless, you can be assured of our commitment to the ongoing endeavour to deliver environmental benefits as well as economic recovery and jobs for local residents.

I have also copied this letter to Tom Crowley at GATCOM and to both Jonathan Drew and Warren Morgan at the NMB.

Yours sincerely

Tim Norwood
Chief Planning Officer
Gatwick Airport