**COMMUNITY GROUP COMMENTS ON GATWICK AIRPORT NOISE ENVELOPE GROUP OUTPUT REPORT**

1. The comments below are submitted jointly by the community groups that participated in Gatwick Airport Limited’s (GAL) noise envelope engagement process, other than CAGNE. A full list of those groups is below.
2. Individual groups may wish to submit supplementary comments in addition to these joint comments.
3. Submission of these comments should not be taken as endorsement of, or agreement with, the noise envelope engagement process undertaken by GAL or of its output report.
4. In our view GAL’s engagement was defective in numerous material respects. As a result, it did not comply with the CAA’s advice on noise envelope engagement or the Government’s requirements as set out in the Airports National Policy Statement (ANPS). Nor did it comprise “*another appropriate method*" of engagement as advised by the Planning Inspectorate in cases where the CAA’s guidance is not followed. The engagement GAL has carried out therefore does not, in our view, provide a sound basis for noise envelope proposals and GAL’s proposals cannot be considered to have been “*defined in consultation with local communities*” as required by the ANPS.
5. Whilst recognising that CAP1129 provides only guidance on the Noise Envelope engagement process, the CAA does make clear that, “*for an envelope to function as intended, it is essential that full agreement is achieved between all stakeholders on the envelope’s criteria, limit values and means of implementation and enforcement.*” In our view, GAL has shown little appetite to carry out this engagement process in a manner capable of delivering such agreement. Instead, GAL has conducted a process that, on the key issues, has failed to provide the time necessary to facilitate the collaborative discussions required to achieve broad stakeholder consensus. We are therefore of the view that GAL’s engagement process has been fundamentally flawed.

**APCAG**

**GACC**

**Gatwick Obviously Not**

**High Weald Councils Aviation Action Group**

**PAGNE**

**Plane Justice**

**Plane Wrong**

**TWANSG**

**Output report comments**

1. The comments below refer to GAL’s Noise Envelope Group Output Report dated 13 September 2022.

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|  | **Reference** | **Comments** |
| a | Slide 2 para 1 | In our view the report does not “*set out alternative approaches to, and additional detail for, the outline Noise Envelope proposal that was included in the Northern Runway Project Preliminary Environmental Information Report (PEIR)”.*  Although the report documents alternative approaches and additional details proposed by community groups and Councils, there is little indication of which, if any, of these GAL will adopt, and it has not put forward comprehensive new noise envelope proposals. None of the additional approaches to, or alternative details for, the noise envelope that are contained in the report change GAL’s outline proposals in a meaningful way. This comment should be removed. |
| b | - | In order to provide context and understanding for readers the report should set out prominently the reservations expressed repeatedly by community groups about the process followed by GAL. Inclusion of these comments solely in GAL’s proposed separate "Report on Engagement on the Noise Envelope", which we have not seen or had an opportunity to comment on, would be inadequate.  The output report should state:  “*Community Group participants in GAL’s engagement process repeatedly requested changes in the format of and timetable for the engagement so as to make it more compliant with CAA advice and government requirements. Amongst other things community groups asked for:*   * *the engagement terms of reference to be changed to comply with CAA advice* * *the process to be chaired by an independent party* * *the timetable to be extended substantially to enable issues to be explored in necessary detail, facilitating greater stakeholder understanding and allowing greater opportunity for consensus* * *a budget for technical advisory support to be provided*   *All of these requests were refused.*  *Community groups also requested additional data and analysis that, in their view, was essential to effective noise envelope engagement and which only GAL was able to provide in the time available. This was also refused.*  *Community groups made clear that the absence of additional information precluded properly informed engagement on metrics and limits and meant that GAL’s process would not be able to generate meaningful outputs.*  *Community groups consider that GAL’s engagement did not comply with the CAA’s advice on noise envelope engagement or the Government’s requirements as set out in the Airports National Policy Statement (ANPS). Nor did it comprise “another appropriate method" of engagement as advised by the Planning Inspectorate in cases where the CAA’s guidance is not followed. As a result, in their view, the engagement GAL has carried out does not provide a sound basis for noise envelope proposals and GAL’s proposals cannot be considered to have been “defined in consultation with local communities” as required by the ANPS.* |
| c | Slide 2 para 2 | We do not agree that “*Numerous topics were discussed with the aim of reaching agreement, …”*.  Given the inadequate timetable GAL imposed on the process, discussion was generally brief and consisted largely of each side stating their positions on key issues. Supplementary analysis proposed by community groups was refused and no response was provided to majority of points raised by groups and councils. There was little evidence that GAL had any interest in reaching agreement on key issues. |
| d | Slide 4 final para | We do not agree that “*All presentation and related material was disseminated 5 days prior to each sub-group meeting, allowing time for participants to review the material and raise questions where needed*”.  In addition, add after this point:  “*Community groups note that GAL only produced and circulated notes of two of the engagement meetings held throughout the process. The lack of record keeping significantly compromised groups’ ability to contribute effectively to the engagement process.* |
| e | Slide 7, 2nd main para | Amend to read:  *“The APF establishes the overall policy on aviation noise, requires a sharing of benefits as airports grow, and envisages using a noise envelope as a means of striking a balance between growth and noise reduction”. It specifically states* *“As a general principle, the Government therefore expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. This means that the industry must continue to reduce and mitigate noise as airport capacity grows.””* |
| f | Slide 7, final para | Change final sentence to:  *“In both cases there would be increases in noise when the runway opened, but in the longer-term leq contours would reduce to levels below those in 2019. Community groups made clear that in their view this did not amount to a reduction in noise, because Leq does not adequately represent the aircraft noise experienced by communities”.* |
| g | Slide 8, final para | Amend to read:  *“One particular Community opinion stated that within Gatwick’s proposal, the day period 51dB noise contour would be permitted to increase from 136km2 in 2019 (and forecast 120km2 in 2029) to 146.7km2, and that noise could potentially remain above historic levels indefinitely if the ATM threshold of 382,000 was not reached.”*  Please note that this is a statement of fact not an opinion. |
| h | Slide 8 | Add at the end:  *“Community groups presented analysis that, in their view, demonstrated that GAL’s proposals do not meet government policy on the sharing of benefits and the obligation to reduce noise as airport capacity grows.”* |
| i | Slide 9 first para | Amend as follows:  *“Government’s policy is to ~~attempt to~~ strike a fair balance between the negative impacts of noise (on health, amenity (quality of life) and productivity) and the positive economic impacts of flights.”* |
| j | Slide 9 second para | Amend as follows:  *“As a general principle, the Government expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. This means that the industry must continue to reduce and mitigate noise as airport capacity grows~~;~~. A~~a~~s noise levels fall with technological improvements, the aviation industry should be expected to share the benefits from these improvements.* |
| k | Slide 9 third para | We are not aware of any policy support for the assertion that “*policy success needs to be judged over the longer term*”. The document should reference any such support, if it exists.  We are not aware of support for the assertion that the Aviation Industry’s track record in improving noise “*is expected to continue*”.  We note that one industry response to GAL’s Autumn 2021 consultation stated “*it is … quite likely that in order to deliver significant aircraft efficiency improvements in the future, that aircraft noise may have to increase*”. |
| l | Slide 10 first para | Amend as follows:  *“This results in a noticeably smaller Leq noise footprint on the ground. However, it is generally accepted that a 3dB reduction in noise would be barely perceptible to people overflown as a change of 3dB is the minimum perceptible to humans under normal conditions.”* |
| m | Slide 11 | For the avoidance of doubt we do not support the noise objective set out on this slide.  The report should record community groups’ views that GAL’s proposed regulation 598 objective cherry picks government policy by:   * omitting the policy requirement to reduce noise as airport capacity grows * omitting the policy requirement for the benefits of growth to be shared * omitting the policy requirement that the total adverse effects on health and quality of life from aviation noise should be limited and where possible reduce.   And that the objective is therefore inappropriate and needs substantial amendment. |
| n | Slide 13 para 1 | We do not agree that the noise envelope within the PEIR was an outline proposal. The PEIR does not describe GAL’s proposal as “*outline*”. |
| o | Slide 15 para 1 | The report should report the proportion of consultation respondents who supported GAL’s noise envelope proposals. |
| p | Slide 15 para 2 | Amend as follows:  *“The ~~GACC~~ community groups paper noted “a noise envelope should comprise, or be derived from, multiple metrics and limits rather than a single metric, in line with CAA guidance”.* |
| q | Slide 15 para 2 | Amend as follows:  *“GAL explained that the CAA noise model is not valid at levels as low as Leq16hr 45dB but has not responded to other community group proposals on metrics other than to restate its own preference for a single Leq metric.”* |
| r | Slide 15 | Add:  *“Community groups argued that there was no policy support for GAL’s proposal to define the noise envelope solely by reference to a single method of measuring noise – Leq. In their view Leq does not represent aircraft noise as experience by communities. Sole use of Leq is inconsistent with CAA advice that a combination of parameters should be used and with the ANPS requirement for an envelope to be tailored to local priorities and to be defined in consultation with local communities. It is also inconsistent with government policy, in the Aviation Policy Framework, that average noise contours should not be the only measure used by airports, and that alternative measures should be developed in consultation with consultative committees and local communities.*  *Community groups also rejected GAL’s view that use of Leq is supported by the CAA’s 2014 Survey of Noise Attitudes. They noted ICCAN’s view that SoNA was not designed to consider the change in noise attitudes caused by an airport undergoing a period of volatility in its operation, such as expansion. They also noted ICAO’s views first that exposure-response relationships are not applicable to assess the effects of a change in the noise climate, for instance where a new runway is opened and secondly that common noise exposure variables (such as Leq) only account for about one third of community impacts. Finally they noted that the evidence around Gatwick is that more frequent noise events is a more significant cause of community impact than increases in average noise.*  *In their view SoNA provides no evidence that Leq is a reliable indicator of community impact over a period in which an airport is growing.* |
| s | Slide 16, final para | We do not agree with the assertion that *“The concept of supplementary noise metrics was discussed, with broad agreement that additional supplementary noise metrics, that do not have limits, should be reported in the Noise Envelope to help foresee problems and manage noise”.*  Our view is that the noise envelope should comprise a suite of metrics. Each of these metrics should have binding limits. Secondary metrics without limits are of no meaningful value to communities. |
| t | Slide 17, para 3 | Amend to read:  *“The community groups ~~GACC~~ argued that the noise envelope should be based ~~set~~ on a best case, strongly incentivised, fleet transition scenario designed to ~~the Central Case or lower to provide an incentive; noise envelopes should~~ incentivise airlines to introduce the quietest suitable aircraft as quickly as is reasonably practicable, in line with CAA advice. In their view by defining the noise envelope based on a slow fleet transition, Gatwick’s proposals achieve the opposite effect, i.e. of disincentivising the introduction of quieter aircraft.”* |
| u | Slide 18 opening sentence | Amend as follows:  *“~~GACC~~ Community Group Key Presentation Points and Opinions:”* |
| v | Slide 18, fourth bullet | Amend to read:  *“Hourly aircraft movements should be limited at all times of day to levels that achieve a progressive ~~ensure the~~ reduction of aircraft noise in all locations to less than the limits recommended by the WHO. GAL challenged if this was reasonable, as to reduce noise levels to the WHO guidelines at properties very close to the airport would require no flights”* |
| w | Slide 19, second para | Delete:  *“The community methods showed a lower proportions with, for example, GACC calculating 30% sharing of benefit for the daytime contour in 2038.”*  Insert:  *“Community groups illustrated that GAL’s proposals did not share benefits between the aviation industry and local communities, as required by government policy. In 2032 GAL and its customers would benefit from a 55% increase in passenger capacity compared to 2019, whilst communities would suffer a 7.9% increase in the day period Leq contour and only a 1.2% improvement in the night period Leq contour. By 2038 those figures would be 62%, 7.6%, and 14.6% respectively. If noise were measured on a meaningful basis (rather than using Leq alone) community groups would suffer disbenefits in all periods.*  *Community Groups noted that the engagement's curtailed timescale resulted in a failure to discuss and agree a target sharing percentage. ”* |
| x | Slide 21 last para | Amend as follows:  *“Community Groups’ ~~GACC’s~~ view was that achievement of noise envelope limits must be enforceable, not subject to …”* |
| y | Slide 23, para 3 | Amend to read:  *“GAL proposed that the primary metric for assessing effects should be the areas of the day and night LAeq noise contours. Following consideration of stakeholder views, Gatwick ~~agreed~~ proposed that additional secondary metrics, including N65 day and N60 night should also be reported by the noise envelope process, but it ~~Gatwick~~ does not agree that these metrics should form part of the noise envelope. Communities did not agree with this proposal, arguing that the noise envelope should comprise a suite of metrics, in line with CAA guidance, each of which should have binding limits.”* |
| z | Slide 23, second part | Add after second bold para:  “*Communities did not agree with GAL’s summary of the purpose of reviews. Amongst other things they consider that reviews should ensure that noise and noise impacts reduce continually as airport capacity grows. Communities also consider that reviews should ensure overall benefits are shared between the aviation industry and local communities, as required by government policy, not just any benefits arising from the introduction of new aircraft technology.* ” |
| aa | Slide 24 | Add:  *“Communities recognise the need for a review body. They emphasis the importance of engagement on the body’s decision-making framework and note that no proposals in this respect have yet been put forward by GAL.”* |
| ab | Slide 25 | Add at the end: *“GAL has not provided feedback on these points.”* |