

CAGNE Communities Against Gatwick Noise and Emissions

umbrella community group for Sussex and Surrey

Airspace Modernisation – Gatwick Airport Design Principle Development

Gatwick have only given until 5th April, less than 3 weeks, for CAGNE Town and Parish Council Aviation Forum to consult and respond. .

<https://airspacechange.caa.co.uk/PublicProposalArea?pID=54>

This is the first stage – ‘Define’ - of the Civil Aviation Authority six stage CAP 1616 consultation process. Gatwick inform us that they are not consulting individual parish or town councils but are relying upon district and county councils, MPs, community groups and AONB organisations. The public and parish/ town council will be consulted in stage 3 of the public consultation.

We are very concerned by the lack of time being allowed for this important stage of the CAP1616 as part of FAS-IS. Gatwick has set less than 3 weeks to engage and have cherry picked who they seek to engage leaving out locally elected councils in favour of community groups of the NMB. This would suggest that the design principles will not be fair or have a geographically spread due to the make up and dominance of some areas of airspace concern, route 4, arrivals east and west at 14nm+ that Gatwick which the NMB has been in breach of Terms of Reference 25 for the past 3 years.

The timescale is not adequate to allow county and district council's time to consult parish and town councils. There would not be a council meeting before the Gatwick deadline of 5th April and they would not have the opportunity to add this subject to the agenda as council elections take place in May.

Many county councils are also up for election; as such they would be restricted to participating in consultations/ engagements. These bodies/ council officers are not necessarily au fait with all the issues of aircraft noise in their county or of airspace workings; as such they are not best placed to be consulted exclusively as they will be replying blind to what is a very important stage of CAP 1616. It should also be noted that many councils have a vested interest in the airport's growth through funding as do the majority of the airports consultative committee.

Gatwick has also instigated this stage 1 process at a time when councils are under going an election process, as such the timing permitted does not allow time for FAS-IS to be added to agendas or discussed by elected members or officers.

Gatwick is also engaging members of Parliament. These elected members are heavily involved with Brexit currently and will undoubtedly be unable to spend time consulting their constituents to respond extensively.

Gatwick are also consulting areas of outstanding natural beauty, but we understand that these are receiving Gatwick funding and so could now be deemed as having a vested interest in the airports growth, similar to local authorities, and thus could place greater influence in protecting their areas to the detriment of other communities.

The decisions made in this stage one will shape the design principles for Gatwick's airspace for many years to come. Given the correct time and engagement Gatwick could help many communities to escape the onslaught of aircraft noise by raising all airspace in the southeast. But with the lack of time and comprehensive detail, what is asked by this Gatwick document will have serious ramification for communities, especially as Gatwick seeks to fly over new areas with concentrated departure routes.

Introduction to CAGNE

CAGNE was formed on the 17th February 2014 due to the ADNID trial departure route being instigated by Gatwick Airport for a PRNAV route (concentrated flight path) over rural areas not previously flown over.

CAGNE has grown and diversified since as an umbrella community group to embrace the many issues that Gatwick presents through their desire for growth including new flight paths, changes to flight paths, increases in noise, and a major campaigning/lobbying force opposing the second and third runway for environmental reasons.

CAGNE has an extensive network of members covering areas to the east, west, north and south, in rural and urban areas, of the airport concerned with totality of aircraft noise produced by arrivals and departures, environmental issues, airspace and surface access for Sussex and Surrey and beyond.

The CAGNE committee consists of volunteers/residents to the east and west of the airport coming from many professional backgrounds including aviation.

An Annual General Meeting open to the public takes place each year in February where the chair and committee are elected.

CAGNE sends out informative newsletters to members, consult its members to formalise responses, and is active on social media – Facebook, twitter and instagram.

CAGNE also operates an independent forum (www.cagnepcforum.org.uk) to engage and consult with town and parish councils called the CAGNE Town and Parish Council Aviation Forum. This is for councils and is run by councillors.

CAGNE is not just concerned with Gatwick Airport, but all airspace and gets involved in other airports in the UK and overseas; the environmental damage aviation has on climate change and air quality worldwide.

We work closely with CPRE Sussex and Surrey and other CPRE offices as well as other bodies such as SE Climate Alliance, Airport Watch, Aviation Environment Federation, Members of Parliament, local authorities and other aviation community groups in the UK and overseas. CAGNE has a seat on Gatwick groups – Noise Management Board and attends GATCOM.

The CAGNE response:

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Q - 1a Do you agree that airspace design must be safe and further promote safety management systems?

Q - 1b Should 'Safer by Design' attract the highest design principle priority?

- 1a Yes – Safety should not feature in this engagement as safety has to be paramount in all operations to safeguard all concerned from drones, old planes, terrorism, etc. Having said that, when issues arise Gatwick should ensure resilience is in line with not flying over new areas when NPR exists to be flown on.
- 1b The safety of those that chose to fly and those that live under flight paths should be paramount when it comes to the flying of drone, old planes, weather conditions and terrorism.

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Q - 2 Should Gatwick adopt the most beneficial form of enhanced navigation standards as the foundation of its designs?

- 2 Yes to benefit communities in a fair and balanced way without flying over new areas on departures or outside of the existing arrival swathe

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Q - 3 Should Gatwick adopt a design principle that offers long term predictability of flight paths and enables beneficial system adaptations?

- 3 No – This is misleading to what is being asked. It would suggest flying over new people below 4,000ft that are unaware of this process and will not necessarily be consulted, as they are not currently overflown.

This process is all about Gatwick growth, which is not sustainable or factual. It uses concentrated flight paths to unfairly target rural and urban communities with increased aircraft movements.

Respite is unfair in the fact that it dictates who will be impacted and when they can be outside to enjoy tranquility all to allow Gatwick to grow.

Respite is a fashionable word that aviation has adopted to allow 'sustainable growth'. The reality is that more communities are to be impacted to facilitate airport growth and profit whilst communities receive no compensation and suffer a decline in house value and wellbeing as a result.

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Q - 4 Should Gatwick adopt a design principle that seeks, through its airspace design, to promote the adoption of enhanced aircraft capabilities that benefit communities and the more efficient management of air traffic?

- 4 No – This should be used to get planes higher quickly on departure and keep planes high longer for arrivals. This is however based purely on concentrated flight paths and so is a major concern. Continuous Climb Operations on departures is not guaranteed, as it will be reliant upon Heathrow airspace demands in the west and north of Gatwick's airspace.

CCO should not be used as an excuse for new departure routes or routing outside of NPR (Noise Preferential routes only exist up to 3/4,000ft after this height planes can already vector/ turn)

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Q - 5 Should Gatwick adopt a design principle that seeks to deconflict by design all Gatwick arrival and departure routes below 7000 feet to reduce the prevalence of overflight of a community by airport traffic on different routes and/or by neighbouring airport traffic?

- 5 Yes but this should not lead to new flight paths outside of NPRs. Overflight exists mostly above 4,000ft, as such if planes can fly higher quicker there will be less overflight of the same communities of departures and arrivals further out from the runway (14nm+). It is closer into the runway where communities are really impacted by multiple routing, but to solve this with new routes can only lead to newly impacted communities at very low heights, less than 4,000ft. This is totally unacceptable as there is no true full house value compensation offered. These areas are mostly rural as they sit outside of NPRs as such residents have paid a premium to live away from aircraft noise. New flight paths would remove this value.

As there are fewer residents they would not have such a loud voice as urban areas making the stage 1 bias to urban residents. To feed data into WebTag would also be bias to urban dwellings, thus targeting rural areas that surround Gatwick.

Point 3.8.2 refers to 'regardless of which runway' this suggests that there is more than one runway to be used during this process. This needs to be clarified, as it would seem misleading.

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Q - 6 Should Gatwick adopt a design principle that seeks to create an arrival route design compatible with time based operations?

- 6 Yes – If this allows holding stacks to be removed then this should be supported to save CO2 and reduce noise from circling planes.

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Q - 7 To what extent should Gatwick consider multiple pathways on: (a) departures and (b) arrival procedures?

This is the most misleading question of the engagement, as it does not explain the ramification of multiple routes on departures as new routes over new areas.

- 7a Yes – a single route up to 4,000ft would keep planes inside the NPR
And No – Multiple routes, as you detail, would mean flying outside of NPRs (Noise Preferential routes only exist up to 3/ 4,000ft after this height planes can already vector/ turn) at low heights over new areas with new routes. There are already issues with PBN on departure routes that cause considerable new noise outside of NPR due to the concentration of noise of aircraft flight, CAP1498, introduced by Gatwick in 2014.
- 7b No – Single routes on arrivals is pure concentration and no rotation of routing ie joining the ILS at 8nm then 10nm then 12nm then 14nm than 16nm is being offered in these design principles. Airlines/ Helios have stated that they would not agree to the increase in fuel costs to allow for a fair and equitable distribution of arrivals across the full swathe which suggests that it is highly unlikely that there will be a fair distribution of arrivals across the full swathe. Any other system of arrival, arks, point merge would be impacting new areas. Joining the ILS at less than 8nm would be impacting those that already suffer the severity of the noise created by Gatwick Airport.

And Yes to multiple routes across the full swathe in a fair and equitable distribution and rotation.

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Q - 8 In what order would you prioritise these 5 overflight management options? Either singularly or groups

- 8 A, C – all other options target rural areas. Respite is a tool to allow Gatwick to unconditionally grow with no consideration for the environmental impact as any CO2 saved will be lost with increases in aircraft movements. Plane manufacturers are encouraged to focus on new fuel but not reducing noise of new technology planes.

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Q - 9 Are there other options we should consider and how would you prioritise themt relative to your response to Q 8?

- 9 Not to fly over new areas with departures; keep NPRs; cap Gatwick's growth in number of movements per departure route; spread arriving traffic in a fair and equitable way across the full current swathe giving rotation of routing; stop night flights.

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Q - 10 Where on the spectrum of A – E would you wish Gatwick airport to prioritise

these factors?

- 10 D, E, A, C – There can be no trade offs, communities have to come first; noise reduction must be the number one consideration.

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Q - 11 Where on the spectrum of A – E would you wish Gatwick Airport to prioritise operational resilience?

- 11 B, C, D, E, A – No new overflight should take place.

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Q - 12 What are your top 5 Airspace Modernisation objectives?

- 12 These all seek growth, modernisation of airspace eg concentrated flight paths and growth which does not benefit communities, especially those in rural areas that are being targeted by these design principles. Areas of Outstanding Natural Beauty and National Parks are important but the balance has to be fair with urban dwelling taking some of the aircraft noise burden.

Category E suggests community benefits from the process, but the reality is that modernisation of airspace is purely to increase aircraft movements day and night. This continues to have serious, negative impacts on community's wellbeing and house values.

Initiatives offered such as CDO and CCO are in reality only possible if airspace can lift substantially in height. We have grave concerns to the north and west of Gatwick that this will not be feasible for departure routes due to Heathrow and north west arrivals to Gatwick as well as Farnborough traffic at peak times.

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Q - 13 What other Airspace Modernisation objectives do you believe we should consider?

- 13 Cap on growth of movements; restriction of movements per departure route; a fair and equitable distribution of arrivals using the full swathe in a rotation of routing; resilience must not be at cost to communities tranquility.

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