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Dear Sir/Madam,

LONDON AIRSPACE CONSULTATION

Thank you for providing us with the opportunity to comment on the important matter of changes to airspace across south east England and in particular around Gatwick Airport.

GATCOM (the Gatwick Airport Consultative Committee) is the statutory advisory body for Gatwick Airport and comprises representatives from local authorities, the aviation industry, passengers, business, environmental interests and other users of the airport. We provide a forum for informed discussion leading to the provision of advice to the Government, Gatwick Airport Ltd and other organisations on a range of matters concerning the operation and future development of Gatwick. As GATCOM represents a broad church of interests and local communities, GATCOM has agreed that its response should only relate to the process and comments providing a strategic overview on concepts rather than on specific routes/areas.

Whilst GATCOM is not in a position to provide detailed responses to the questions posed in the consultation document we offer the following points for NATS/GAL and the CAA to take into account in further developing the final routes:

Consultation Process

While GATCOM supports the early consultation on the concepts being considered, there has been a significant level of concern expressed across our membership about the consultation process and, particularly the lack of detail about the final proposed routes to be flown. A delegation from GATCOM comprising our Chairman, Vice-Chairman, GATCOM's Lead Member for Noise, GATCOM's Independent Technical Adviser and the Secretariat, have discussed this in more detail with Andy Taylor, NATS and Tom Denton, Gatwick Airport Limited. While GATCOM acknowledges the principle of the approach to the consultation and has, to a degree, been reassured that the consultation on "routes" (swathes) is consistent with the CAA's CAP 725 (which has been formally confirmed to GAL in writing from the CAA) provided the suggested approach as set out below is taken on board prior to any submission to the CAA for approval.

By EMAIL

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Once the detailed routes have been designed, particularly in relation to those below 7000 ft, NATS/GAL give public notification of the outcome of the consultation and of the final route design to be submitted to the CAA for approval and at the same time undertake a separate consultation on proposals for respite on those final proposed routes.

As P-RNAV will enable aircraft to fly more precisely resulting in a concentration of overflight along a certain route, there is a vital need to explore options to provide some form of respite for those living under the flight paths for both arrivals and departures. GATCOM therefore urges GAL/NATS to identify forms of respite and the use of multiple paths within the detailed design of the routes which should be subject to a further separate consultation, to include other organisations and individuals who may represent people living underneath the proposed flight paths up to 7000 ft. This will enable affected communities to feedback on the way in which proposed routes are to be used rather than on the location of the proposed final design of a specific route. This would be consistent with the advice given in the DfT's Guidance to the Civil Aviation Authority on Environmental Objectives Relating to the Exercise of its Air Navigation Functions.

In respect of the detailed design of routes at lower altitudes, GATCOM also strongly suggests that a second round of consultation be undertaken particularly in respect of changes to the NPRs and SIDs as required by the CAA's CAP 778.

If, in the event that GAL/NATS decides that this suggested notification and consultation on the use of routes should not be pursued, GATCOM is of the view that the current consultation exercise does not satisfactorily fulfil all the requirements of CAP 725 or CAP 778.

Location of Point Merge Arcs and use of airspace over the sea

It is acknowledged that it is proposed to replace conventional holds or stacks with a new design concept, Point Merge which will change the spread of flight paths across South East England. While the potential environmental benefits of this concept compared with the existing holding/stack arrangements are recognised, a number of our members have questioned whether greater use could be made of the airspace over the sea, particularly in respect of the future location of the Point Merge Arcs, to further reduce the impact of overflight on local communities. It is understood that in the later phases of redesign Heathrow's airspace there may be potential options to further explore the location of Point Merge Arcs over the sea at a much higher level as the barriers that currently exist as a result of the Heathrow/Gatwick traffic will have been resolved. GATCOM therefore requests that NATS gives further consideration to this point but only if it does not result in a concentration of flights at low altitudes over greater distances over the land.

Design of final routes

GATCOM urges NATS/GAL to avoid wherever possible designing flightpaths over areas not previously overflown or that will increase overflight significantly over areas that currently experience little overflight.

Preserving the noise climate for AONBs and areas of tranquility

GATCOM fully supports the principle of designing routes that avoid densely populated areas and improves or preserves the noise climate for AONBs and areas of tranquility where the ambient noise levels are lower and over other sensitive areas. It is hoped therefore that in developing the final design of routes the advice contained in the DfT's Guidance to the Civil Aviation Authority on Environmental Objectives Relating to the Exercise of its Air Navigation Functions is taken into account together with the key aim of reducing the overall impact for communities.

Respite

GATCOM fully supports the concept of providing respite or identifying the use of multiple tracks within a route. As part of this and as mentioned above, GATCOM urges NATS/GAL to avoid wherever possible designing flightpaths over areas not previously overflown or

that will increase significantly overflight of areas that currently experience little overflight.

Mitigation/compensation

While it is acknowledged that there is no legal requirement to pay compensation to people who feel they may be disadvantaged by airspace changes, GATCOM urges NATS/GAL to consider forms of compensation/mitigation for those people not previously overflown (or to be significantly overflown) that will be impacted by the proposals.

Noise impact studies and the need for research

At the time of the operational introduction of P-RNAV departures at Gatwick Airport in 2012 GATCOM highlighted the need for there to be a positive take up of the procedure by airlines so that the monitoring of implementation over the next few years could provide meaningful data on which to base decisions for the future. GATCOM believes it important that a full assessment of the noise and disturbance impact is measured and explained to those under the NPRs so that an informed decision can be made on the future NPRs and what mitigation or amelioration schemes are required for those who suffer the negative impacts.

In order to demonstrate that noise and other impacts have been taken into account in the final design of routes as part of this consultation and to give confidence to affected communities that the right routes have been identified, GATCOM urges NATS/GAL to undertake noise impact studies into the likely effects of noise on a range of route options overflying rural and urban areas and different topographies to ensure that the negative impacts on sensitive areas (urban or rural) can be minimised. It is also hoped that the data being collected from the operation of P-RNAV on departure routes at Gatwick is also considered.

In addition to this, there needs to be research to assess and weigh the positive noise and air quality impacts of reducing the area currently over-flown against the negative noise and air quality impacts of intensification in frequency of flights along a single path. This should additionally include full consideration of appropriate respite and other feasible mitigation measures.

GATCOM has also highlighted to the Government and the CAA the urgent need for research to be commissioned into the effects of aircraft overflight on communities looking beyond the effects of noise and examining the causes and costs of annoyance. GATCOM believes there is a need to improve understanding of how people become annoyed by aircraft noise and hopes that NATS/GAL can through the results of this consultation urge the CAA to work with the industry to support independent research to improve understanding to enable the industry to respond and communicate its work.

Finally, GATCOM would like the opportunity to be consulted again in the later phases of LAMP when the departure routes for Heathrow are being examined as there may be implications for the altitude of Gatwick's aircraft.

Yours faithfully,



Assistant Secretary