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Gatwick Airport Consultative Committee

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Dear Sir/Madam,

LONDON AIRSPACE CHANGE – GATWICK LOCAL AREA CONSULTATION

I would first say that GATCOM very much welcomes this second stage consultation on the proposals for departure and arrivals routes at Gatwick and thanks GAL for listening to the Committee's concerns raised in first stage London Airspace Consultation.

As GATCOM represents a wide cross section of interests and local communities, the Committee 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.

Developing changes to London's airspace is a highly complex and sensitive issue and one that requires the provision of clear and concise information and proactive publicity in a way that can be understood by lay persons and the wider communities around Gatwick. Given the complexities of the subject and the technical information and jargon contained in the consultation document it was unfortunate there was not an opportunity or scope in the proposal development timetable for GAL to seek the views of NATMAG and/or GATCOM Steering Group on the content and readability of the draft document. GATCOM members have received much feedback from their communities about the difficulties they have had in fully appreciating and understanding the proposals and the implications. There have also been concerns about the consultation document only being available on-line.

Concentration Policy

GATCOM supports in principle the Government's policy of limiting and where possible reducing the number of people significantly affected by aircraft noise and to minimise noise/overflight over densely populated areas. The concentration of flight paths through the use of performance based navigation (PBN) gives rise to a number of new environmental challenges. The capability of aircraft to fly very accurate tracks with minimal intervention by ATC means that noise preferential routes (NPRs) can be narrowed, as is suggested in the consultation document. GATCOM acknowledges that whilst this brings benefits for some residents as routes become more concentrated as they will experience fewer flights, which are to be supported, other residents living under the centreline of a narrower flight path will experience significantly more traffic and

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disturbance. For those communities under a flight path, serious consideration must be given to mitigation and compensation measures.

Design of final routes

GATCOM urges NATS/GAL to avoid wherever possible designing flightpaths over areas not previously overflowed. If new routes do feature in the final design, GATCOM urges GAL/NATS to avoid areas of population and it must be demonstrated that the new route would bring significant positive benefits for a greater number of communities/population compared with the population that would suffer the disbenefit. The current departures trial known as ADNID uses a new route over areas not previously overflowed to a great extent. This has resulted in a significant number complaints from communities about the frequent and excessive disturbance suffered and residents have serious concerns that if made a permanent route under the airspace change proposal this would have a detrimental impact on the tranquillity of the area, property values and the health and well-being of residents. This is a matter that must be addressed and a solution found to protect financial loss in the case of newly overflowed properties.

Respite

GATCOM fully supports the concept of providing respite or identifying the use of multiple tracks within a route. The provision of respite for communities is vitally important but this needs to be carefully considered so as not to create situations where the use of different routes creates disturbance for communities not previously overflowed.

It is acknowledged that the consultation document is seeking comments on the width of NPRs. It is also noted that the CAA is carrying out research to develop the evidence base for the possibility of introducing narrower NPRs. Whilst this research is being undertaken and evidence gathered, GATCOM would suggest that at this stage in the process retaining the current breadth of the NPR is important as it ensures greater potential to provide respite opportunities along routes.

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.

Mitigation/compensation

Whilst GATCOM advocates developing local solutions to local problems, the Government, working with the CAA and industry, needs to consider the impact of its policy of concentrating flight paths and the implementation of the CAA's Future Airspace Strategy on those communities worst affected by airspace changes and what principles should inform compensation schemes particularly for those communities not previously overflowed, or experienced little overflight under the current arrangements.

There is currently no legal requirement to pay compensation to people who feel they may be disadvantaged by airspace changes particularly if they suffer loss of property value.

Noise impact studies and the need for research

As mentioned in GATCOM's response to the first stage London Airspace Consultation, 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 and the impact on health and well-being. 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 are expected to be implications for Gatwick's arrivals and departures and hence for the surrounding communities.

Yours faithfully,



Assistant Secretary