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Gatwick Airport Consultative Committee

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26 January 2026

Dear Airspace Modernisation Team,

Consultation on proposed changes to the Air Navigation Directions and Air Navigation Guidance– GATCOM response.

The Gatwick Airport Consultative Committee (GATCOM) membership brings together a broad range of interests including local authorities, local community and environmental groups, businesses, tourism, airlines, passengers, and other users of the airport to discuss a wide variety of matters concerning the operation and future development of Gatwick Airport. This broad range of interests inevitably results in differing views on many issues.

Regarding significant consultations such as this one, we encourage and hope that many GATCOM member organisations submit full and detailed responses directly so that all views are included.

GATCOM did not have a scheduled full meeting during this consultation period, but we have sought members views via email and a draft response was discussed by the GATCOM Steering Group on 26 January. GATCOM would like to make the following comments in relation to the proposals and hope they can be considered as part of the DfT's consultation process.

Strategic Prioritisation and changes to altitude-based priorities

This proposes replacing Altitude-Based-Priorities with a new system called Airspace Design Priorities and to simplify the criteria from three to two categories, with noise prioritised up to 4,000ft and flight efficiency (to reduce carbon emissions) prioritised above that altitude.

There is significant concern amongst community groups and some elected Councillors around Gatwick that removing noise as the priority above 4,000ft will have a disbenefit for communities under flight paths and that residents are currently annoyed by aircraft up to 7,000ft. We also feel there is a lack of evidence that amending the

altitude priorities in the way proposed would reduce emissions. In addition, there is concern that communities would not have a voice in relation to any ACP above 4000ft.

Whilst we are aware that Gatwick Airport already have Continuous Descent for arrivals, which is beneficial for both noise and emissions, this is not the case for all departing aircraft, which also cause greater noise, and we understand and hope that Airspace Modernisation seeks to resolve this shortcoming by deconflicting traffic using other airports.

Noise Preferential Routes (NPRs) at the three designated London airports –
The proposal is for airports to publish track-keeping information as well as de-notify the NPRs.

Gatwick Airport already publish track-keeping information via a quarterly Airspace report that is available on their website. This is something GATCOM supports, and we review regularly via participation in a Noise and Track Monitoring Advisory Group.

Gatwick Airport is one of the designated London airports. The presence of published NPR's gives assurance and predictability to the public about those areas which will be affected by noise from relatively low flying aircraft i.e. below 3,000 or 4,000ft. Therefore, to remove these is obviously concerning for residents. These NPRs are a key, practical control on where aircraft turn and climb immediately after take-off. If NPRs are removed, the replacement should be equally enforceable with binding low altitude design rules, enforceable UK-metric tests, and transparent monitoring, as well as ideally delivering the same or better protection for communities below 4,000ft.

GATCOM has previously written to the CAA and the DfT following the publication of the Fair and Equitable Distribution study that was published in February 2025 (CAP2971). Those letters requested that the FED Framework be embedded into regulation, and this is something we still hope can be achieved. GATCOM members continue to hold this view but in addition, we feel that more research would be needed into the community noise impacts of single or multiple flight routes.

Consultation Process and use of 3rd Parties - The consultation is considering whether there would be benefit in consultation with individuals and/or their representatives via Local Authorities (LAs).

GATCOM wholeheartedly supports the aim of better engagement. However, it is important to give assurances that all stakeholder and local community views and concerns will be heard. Any enhanced role for local authorities should not exclude categories of stakeholder, such as local community groups, from direct engagement and consultation processes.

LAs should not be expected to shoulder the full delivery burden of engagement and consultation. If the DfT decides that LAs be given a greater role, consideration needs to be given to provide funding for them to undertake the role, including potential to access funding from the Airspace Modernisation Fund. Types of engagement mechanisms would also need to be clearly defined. If adopted, then joint engagement could be considered, with CAA or UKADS technical support, and LA led interface to ensure timely engagement that reflects local circumstances.

Also as highlighted in our previous letters in relation to embedding FED frameworks into regulation, GATCOM would want to see engagement and consultation at an early stage.

Airspace Trials and Temporary Changes to Structures

When airspace trials and temporary structures are being extended, the impacts in the first part of the trial period should be considered.

If 3-year trials are permitted, GATCOM suggests an annual monitoring review should be a mandatory condition of the approval.

Some GATCOM members also feel that there should be provision to halt trials and temporary changes if they have material community impacts and that monitoring and reporting of noise complaints during a trial or temporary airspace change does not provide adequate protection for communities.

Environmental Assessments

GATCOM disagree that environmental impacts should be disregarded entirely for the proposals for trials. In any Environmental Impact Assessment or Strategic Environmental Assessment, you would still give due consideration to impacts even when they occur on a temporary basis, so duration is not a legitimate reason to ignore the impacts.

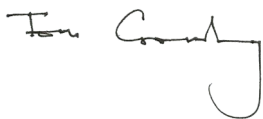
Other Issues

We note that the consultation or guidance does not mention compensation. GATCOM has previously raised the issue about compensation for people whose properties would be subject to new or more intensive flight paths. In other infrastructure sectors, people whose properties are impacted would be compensated and this is something that GATCOM believes Government should consider in relation to Airspace Change.

We hope these comments are helpful and will be considered and addressed as part of the consultation.

I am happy for this letter to be published as the GATCOM response to the consultation.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Tom Crowley". The signature is written in a cursive style with a large, sweeping flourish at the end.

Tom Crowley
GATCOM Chairman