

LONDON AIRSPACE CONSULTATION

By Gatwick Airport Ltd (GAL) and National Air Traffic Service (NATS)

Important Brief for GACC members.

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Introduction

1. London Airspace Consultation <http://www.londonairspaceconsultation.co.uk/> concerns the design of new flight-paths into and out of Gatwick Airport. It is sponsored by Gatwick Airport Ltd (GAL) and National Air Traffic Service (NATS).
2. It is important because it contains the possibility that some people will suffer less noise and that others will suffer far more noise than at present. But the consultation deals only with broad principles for the design of new flight-paths and does not reveal where those flight paths might be. What's worse, GAL and NATS do not intend consulting again when their intended flight-paths are known (except if very restricted circumstance).
3. GACC has protested that such drastic changes to existing flight-paths can not be handled adequately in this way and we have said that this consultation should be followed by a second, when the proposed new flight-paths are known. We are pleased to say that this idea gained the backing of the Airport Consultative Committee but we do not yet know how GAL and NATS will react.
4. Please do not wait. It makes sense to respond to this consultation on flight-path design as well as to any subsequent consultation on the proposed flight paths. The deadline is 21 January 2014.
5. GACC will be responding but **you need to respond too** in respect of your own back yards. Remember, NIMBYs are not bad people. If they don't look after their own back yards, nobody will and the whole environment will suffer. GACC will make general points for the whole region but you need to speak up for your own areas.
6. Please do not imagine that this does not affect you, because you are not presently over-flown; the new flight paths will certainly be different. The new routes could be placed anywhere between Chichester and Tonbridge. People that are not affected by Gatwick at present may find themselves over-flown every couple of minutes. Not only will this be distressing but it will also impact on the value of homes.
7. Departures are particularly noisy close to the airport. Because of this they follow Noise Preferential Routes (NPRs) until they reach 4000 ft. Those NPRs were established long ago, when aircraft were fewer but noisier than now. The NPRs are wide corridors 3 Km (nearly 2 miles) across and planes are widely distributed within those corridors. Once they reach 4000 ft they head off towards their destination, which cause them to be even more widely distributed.
8. Arrivals follow a very precise track for final approach (from around 17 miles out) and so people living on that track experience frequent disturbance (often nearly one a minute). Arrivals also cause disturbance as they approach the final approach path, generally from the South where they have

often been held in stacks. They do so in a wide swathe but some people get over-flown very often within the wide swathe.

9. The maps on pages B7 to B10 show the present flight paths for Gatwick. Do not be confused by the references to runway 08, runway 26 and to both runways. They are the same piece of tarmac operating in different directions. When aircraft take off and land towards the west the runway is called 26. When they take-off and land towards the east it is called 08.

The proposals

10. These plans, which are nothing to do with a second runway, include:

- ➔ New flight paths over areas which are at present peaceful – in order to increase the number of aircraft able to use the runway.
- ➔ More concentrated flight paths based on more accurate aircraft navigation.
- ➔ A major reform of the pattern of aircraft queuing up to land.
- ➔ The possibility of ‘respite’ by using two flight paths on alternate days.

11. An important feature is the “Point Merge” system. It involves getting arriving aircraft to fly round an arc (a portion of a circle) and calling each of them off towards the final approach path so that there is sufficient space between them. As they are called off, they will each head towards a single merge point and then will follow a single track to the final approach path. The single track might be developed into two tracks for respite purposes.

Why is this being done?

12. NATS and GAL offer several reasons for redesigning the airspace around Gatwick.
 - The number of flights has grown enormously since the existing flight paths were designed.
 - EU rules require new technology (satellite navigation) to be introduced so that aircraft can be routed more accurately and efficiently.
 - Redesign of flight-paths will – it is claimed - make it possible to reduce noise and pollution.
 - The more precise navigation and reorganisation will make it possible for aircraft in the Gatwick area to fly higher for more of the time.
13. But one of the main motives for redesigning the airspace is to allow the number of flights to continue to grow. It is our task to press for design criteria that minimise noise and pollution, even if this limits the potential for growth to some degree. It is wrong that aviation should be allowed unfettered growth (not to mention tax concessions that encourage greater growth) at the expense of the health and wellbeing of people on the ground.
14. So don’t concede the need for growth. The case for health and wellbeing is stronger, particularly in view of the fact that the money people spend on holidays abroad is money they don’t spend on the high street at home. There is nothing wrong with the occasional foreign holiday but our high streets and quality of life need support too.

Why now?

15. The deadline for the introduction of changes is 2020 but GAL and NATS would like to be ahead of the game. If any new runways are built in the South East the exercise would need to be repeated, in part, depending on where the new runway was to be built. But it is not possible to complete a new runway before 2025.

What is the scope of this consultation?

16. For the Gatwick area this consultation concerns all arrivals from where-ever and all departures except those going north. The area covered is shown in the map on page A6 of the consultation document and covers much of Surrey, all of East and West Sussex some of Hampshire and much of Kent. All GACC members should consider themselves within the scope.

What will GACC say?

17. The first thing we shall say is that a consultation on basic principles is a good thing but can not replace consultation on the eventual flight-path proposals. It would be wrong for the new flight-paths to subject new areas to noise without notice and the opportunity to comment – so there must be a second consultation on the proposed flight-paths, when they have been worked out. We will make this point to NATS and GAL and we suggest you include it in your responses too. We will also make the point formally to the Civil Aviation Authority and to local MPs and the Department for Transport.
18. We shall say that research is needed into the impact of noise in varying circumstances. We hope you will endorse our case for research as well as defend your own interests. If you live in a town you may wish to defend the present practice of avoiding towns. If you live in the country you may want to speak up for the value of tranquil areas and point out that towns people use the countryside for recreation. Access to the countryside is one of the greatest assets of the region.
19. We will suggest that home owners who are newly over-flown should be compensated and that the design of new flight-paths should have, as a high priority, the avoidance of areas that have not previously been over-flown. Please endorse the case for compensation.
20. International Standards Organisation guidance is that noise limits in rural areas should be 10db lower than in urban residential areas and we will suggest that routes should take account of this. We will also point out the value of the Areas of Outstanding Natural Beauty (AONBs) surrounding Gatwick – not only to those who live within those areas but also to visitors and businesses provided for those visitors. Such businesses are important to the economy. And where AONBs are hilly the noise is even greater. You may wish to endorse these points, depending upon your own circumstances.
21. Paragraph 3.22 of the consultation document makes the point that the new routes will be narrow paths rather than broad corridors so anybody located under the path will find that every aircraft passes directly overhead. We will make the point that at any altitude below 7000 ft a single path would be intolerable and damaging to the health of the people concerned. But again research is needed to determine whether some means of ameliorating would help in varying circumstances. Please back the case for research into ways of ameliorating the concentration of flight paths.

22. The proposal at paragraph 3.6 on page B11 would put a number of departing aircraft over the east of Horsham and is certain to cause considerable annoyance to a new set of people. It might reduce the traffic near Capel and Ockley but since the purpose of this change is to enable more flights to take off in the early morning there may be no winners in this. GACC will not be suggesting which areas should be over-flown but we will point out that people who are newly disturbed would have a case for compensation. You may wish to defend your own local position.
23. No change is proposed for departures taking off towards the east.
24. The diagrams B6 and B7 on page B14 of the document show how respite routes might work. As indicated in paragraph 22 above, we are concerned that narrow flight-paths could create intolerable situations and that some amelioration is required. This could take the form of simultaneous load sharing between several paths or of alternating use of paths so that people have predictable respite. You may wish to state which you prefer or to back our case for research into which works best.
25. Paragraphs 3.26 and 3.27 on page B16 of the document acknowledge that a second consultation may be required, but only in respect of changes to the noise contours around Gatwick. These contours only extend beyond the airport a few miles east and west but annoyance caused by aircraft extends about 20 miles in every direction. As indicated in paragraph 16 above we will insist that a second consultation is needed when new flight-paths are proposed.
26. The box on page B20 of the document invites views on areas or places that should receive special consideration. GACC will make the point that flights over high ground cause more noise disturbance than over low ground and that this should receive consideration. You may wish to endorse this point and to add other candidates for special consideration.
27. The box on page B21 is similar but contemplates avoiding sensitive locations at certain times (e.g. weekends). GACC will not be making suggestions but our members may have interests that they will wish to express.
28. GACC has concerns about the proposed Point Merge system. The reduction in holding and in stepped descents would be welcome (reduced noise and pollution) but we are very concerned that every arriving aircraft would pass over the merge point and take exactly the same path from there to the final approach path. This could make life intolerable for those immediately underneath. GACC will draw attention to this concentration of flights and will suggest that the merge point may be unnecessary and that aircraft could approach the final approach path on a variety of routes. Our experience is that many people are disturbed by the number of aircraft flying over them rather than the volume of the noise they emit. This makes concentration of flight paths undesirable. We hope you will support us in your responses.
29. The consultation document suggests that Point Merge is desirable because it makes it easier for controllers to handle an increased number of flights. We shall say that we have no problem with making life easier for controllers but not at the expense of increased concentration of flights so that people are driven to distraction in their homes and gardens or are unable to enjoy the recreation facilities of the surrounding countryside and particularly the Areas of Outstanding Natural Beauty (AONBs) and National Parks. Please support us in this.
30. GACC will also suggest that the arcs that replace holding stacks should be located out at sea rather than over the South Downs, as at present. Please support this.
31. Paragraph 3.18 suggests that Point Merge helps in avoiding sensitive areas and provides the possibility of respite routes to which we give a cautious welcome. It also boasts that the area over-

flown would be reduced but this might not be beneficial if it means that arriving aircraft would all follow the same track. Paragraphs 3.23 to 3.26 of the document suggest that Point Merge for arrivals could facilitate continuous climb for departures. This would be welcome but we doubt whether Point Merge and particularly merge points are essential.

32. Paragraph 3.32 points out that avoiding sensitive areas (urban areas and valuable tranquil areas) involves extra miles, more fuel and extra emissions. But the extras are trivial compared with those for the flights in total. We shall say that avoiding sensitive areas should take precedence up to 7000 ft. Please support us in this.