

London Airspace Change – Gatwick Local Area Consultation

Background

The 'London Airspace Change – Gatwick Local Area Consultation' sets out further proposed options for changes to preferred flight paths into and out of Gatwick Airport. This follows a related consultation between October 2013 and January 2014, which SDC responded to.

There are two modes of operation at Gatwick Airport – 'Runway 08' and 'Runway 26'. 'Runway 26' operation sees flights taking off to the west and arriving from the east. It is this mode that is most frequently used because of prevailing winds (approx. 75% of the time). Because of the lack of limits on the height of arriving aircraft, noise from arrivals from the east generally cause the greatest concern to residents in the south of Sevenoaks District. 'Runway 08' operation sees flights taking off to the east and arriving from the west. There are currently two Noise Preferential Routes (NPRs) for flights taking off to the east that cover parts of Sevenoaks District. One route runs south of Edenbridge, over Marsh Green and Penshurst (called DVR/BIG/CLN). The other route runs north of Edenbridge, over Crockham Hill (called LAM) (see appendix A).

Summary of Proposals and SDC's Proposed Response

There are a number of options for how different flight paths into and out of Gatwick can be amended, as well as a number of related technical questions raised. Some of the proposals set out in the consultation document do not directly affect Sevenoaks District.

One proposal that is of interest would see a more concentrated spread of departing flights to the east, near Markbeece, Penshurst and Chiddingstone (see appendix B). The proposed response (questions 2a-e) suggests that if it is possible for more concentrated flight paths to be identified then a number of alternative flight paths within the exiting DVR/BIG/CLN Noise Preferential Route area should be identified and consulted upon. This would provide the scope for planned respite for different areas at different times or on different days.

Another proposal would see the departure route to the north of Edenbridge, over Crockham Hill, no longer used. The proposed response (questions 2a-e) supports the principle of the closure of the route over Crockham Hill but objects to the flights previously using this route being redistributed onto the route over Markbeece, Penshurst and Chiddingstone. It is suggested that, as this area already bears the brunt of arriving aircraft, flights previously using the route to be closed should instead use routes to the north and south, which are outside of Sevenoaks District.

The third proposal that would affect areas of Sevenoaks District is a potential night time respite option when aircraft land from the east, which would see two routes used at

different times (appendix C). The respite route would centre over Cowden, which currently appears to be hardly affected by noise from arriving aircraft, and the other would centre over Penshurst, which is within the area that is currently affected. The proposed response (questions 3a-c) suggests that instead of respite routes being introduced that lead to new areas being affected, consideration should be given to whether respite routes can be identified within the areas currently affected, given that it is suggested that flight paths will become more concentrated. It is suggested that any proposals that are feasible should be published for consultation.

In addition to responding to proposals in the consultation document, the proposed response takes the opportunity to reiterate the following points made in previous responses:

- SDC does not consider that the primary objective of this review should be making best use of the existing runway. Instead, the objective must be to balance this with reducing the number of people and businesses significantly affected by aviation noise and the impacts on those people and businesses that will remain affected.
- Decisions on preferred flights paths should be made with the benefit of ground noise data.
- Night-time respite should be introduced by placing severe limitations on all night flights (arrivals and departures) at Gatwick and a meaningful period should be introduced in which there are no flights (for example 12AM to 6AM).
- Restrictions and meaningful penalties should be introduced to ensure that aircraft approach Gatwick at their maximum safe height at all times of the day.
- Effective use should be made of non-regulatory instruments such as differential landing fees to reduce night time noise further.

Recommendation

It is recommended that the proposed response, set out below, is sent to Gatwick Airport Limited.

Proposed Response

Questions 1a-e: These questions relate to departures to the west when the airport is in RWY26 mode (departures to the west; arrivals from the east).

These proposals do not directly affect areas in Sevenoaks District and Sevenoaks District Council (SDC) has no comments to make.

Question 2a: Compared with today's routes, do you believe the proposed realignment for RWY08 departures to the east/northeast of Gatwick Airport is better or worse?

SDC understands that this proposal would see the currently little used LAM route over Crockham Hill, amongst other places, removed. It is also understood that the 'spur' of the DVR/BIG/CLN route over Hever Castle and Chiddingstone Causeway, amongst other places, will be removed. SDC notes that the reason that the LAM route is little used is because it points climbing traffic towards a busy route for descending Heathrow arrivals. SDC would be concerned if a motive for removing this route was so that NATS (*who are responsible for the network of routes across the UK*) could consider a realignment of flightpaths or an increase in traffic related to Heathrow, or any other airport, over this area. We note that this is to be the subject of a later consultation, which makes it impossible to consider the consequences of any changes made through the consideration of airspace around Gatwick.

SDC is supportive of the principle of the closure of the LAM route, on the basis that it will reduce the number of people in Sevenoaks District affected by aircraft noise. It will also put an end to flights over some of Sevenoaks District's important tourist attractions, such as Chartwell. However, communities under the DVR/BIG/CLN flightpath, such as Penshurst, already bear the brunt of arrivals into Gatwick (which are considered in more detail later in this response). As a result, SDC would object strongly to flights that would previously have used the LAM route now using the DVR/BIG/CLN route. These should instead be redistributed between the SFD and SAM/KENET routes, which go west of East Grinstead and south of Redhill, respectively. These areas appear not to be affected by arriving aircraft.

The narrowing of the preferred route swathes should lead to less people being affected by noise from departing aircraft, as your analysis shows. However, it is logical that this will also result in some areas being more consistently overflowed, with greater resulting impacts on people and businesses. SDC would like to see consideration given to the possibility of identifying a number of narrower swathes within the existing DVR/BIG/CLN preferred route swathe so that options for respite can be consulted upon before any decision is made. This should be presented alongside actual ground level noise metering so that the actual impacts on communities can be better considered.

Question 2b: Which, if any, factors do you believe to be the most important for us to consider when determining whether to realign the RWY08 departures to the east/northeast?

There are clearly numerous impacts that are felt by people as a result of aircraft noise and SDC agrees with Edenbridge Town Council's view that it is almost impossible to rank these because people's susceptibility to noise will differ. Noise that affects health and disturbs people's sleep is clearly a major factor, which is why SDC will continue to lobby Government for significant reductions in the number of night flights into and out of Gatwick. In addition, SDC is very concerned about the impact of aircraft noise on business and tourism, including regionally important tourist attractions like Hever Castle and the tranquil areas of the Kent Downs and High Weald Areas of Outstanding Natural Beauty.

Question 2c: If we were to implement the proposed route, what width NPR swathe do you think is most appropriate?

As noted in the response to question 2a, SDC would like to see consideration given to the possibility of identifying a number of narrower swathes within the existing DVR/BIG/CLN preferred route swathe so that options for respite for different communities within that area can be consulted upon before any decision is made. This would not increase the number of people affected from current levels but may help to manage the disturbance by providing planned respite.

Question 2d: If you answered question 2c, what were the reasons for your choice?

SDC's position and justification is explained above.

Question 2e: What, if any, comments or suggestions do you have about the proposals for the realignment for RWY08 departures to the east/north east?

SDC's position on this proposal is set out above.

Question 3a: Should we seek changes to the current DfT noise abatement requirements, so that the proposed night-time arrival respite route for RWY26 could be implemented (as shown in Map 34 and Map 35)?

Section 8 of the consultation document appears to consider two distinct proposals. The first proposal is that arrival flight paths will in the future be much more concentrated than they are today because of the introduction of Performance Based Navigation (PBN). The consultation questions do not relate to this proposal. The second proposal is that an alternative route for arrivals from the east is introduced at night to provide respite. It is this proposal that the consultation questions relate to.

SDC considers that night-time respite should be introduced by placing severe limitations on all night flights (arrivals and departures) at Gatwick and a meaningful period should be introduced in which there are no flights (for example 12AM to 6AM). It is recognised that Gatwick currently operates within restrictions set by Government. SDC will continue to lobby for these restrictions to be amended whenever the issue is being considered. SDC also considers that restrictions and meaningful penalties should be introduced to ensure that aircraft approach Gatwick at their maximum safe height at all times of the day.

SDC considers that an explanation needs to be provided for why a number of day-time respite routes within the existing affected areas (as shown on maps 34 and 35) could not be introduced if it is going to be possible to provide more concentrated arrivals routes in the future. This would not increase the number of people affected from current levels but may help to manage the disturbance that they suffer.

The night-time respite option proposed in the consultation document would see areas that are currently hardly affected by noise from aircraft approaching Gatwick overflown frequently. Not only would these communities and businesses (including Hever Castle)

be much more regularly overflowed than at present, they would be overflowed at a lower height than those communities under the 'main' arrival routes (as shown on maps 34 and 35 of the consultation document). Aircraft would also be turning at these lower heights, which would further increase the noise and disruption that it causes. A number of respite routes should be considered within the area currently affected by night-time noise, and if feasible then consulted upon, before options that would involve disturbance to new communities are considered.

Question 3b: Which, if any, factors do you believe to be the most important for us to consider when determining whether to seek changes to the current DfT noise abatement requirements, so that the proposed night-time arrival respite route for RWY26 could be implemented?

The factors that respondents to this question are asked to choose from are misleading. The consultation document does not put forward proposals for day-time arrivals respite routes but the question asks respondents to rank factors that include 'noise over populated areas in the daytime'.

As noted in SDC's response to question 2b, it is very difficult to rank the impacts of noise. However, the impact of noise on sleep, and the impact that this can have on people's health, is clearly a major factor at night. The impact on the vast majority of businesses would not be as great at night but the impact on tourist accommodation and, therefore the number of people visiting this part of the District, is likely to be significant.

Question 3c: What, if any, comments or suggestions do you have about the proposals for us to seek changes to the current DfT noise abatement requirements, so that the proposed night-time arrival respite route for RWY26 could be implemented?

As noted above, SDC considers that night-time respite should be introduced by placing severe limitations on all night flights (arrivals and departures) at Gatwick and a meaningful period should be introduced in which there are no flights (for example 12AM to 6AM). Effective use of non-regulatory instruments such as differential landing fees should be used to reduce night time noise further.

Restrictions and meaningful penalties should be introduced to ensure that aircraft approach Gatwick at their maximum safe height at all times of the day.

Questions 4a-c: These questions relate to night-time arrivals from the west when the airport is in RWY08 mode (arrivals from the west; departures to the east)?

These proposals do not directly affect areas in Sevenoaks District and SDC has no comments to make.

Question 5a: Should Gatwick Airport Ltd re-centre and narrow the published Noise Preferential Routes (NPRs) to take account of aircraft performance on the modern Performance Based Navigation (PBN) routes in place at Gatwick Airport?

As suggested previously, SDC would like to see greater consideration given to whether it is possible to identify a number of routes within the existing NPR swathes. This would not increase the number of people affected from current levels but may help to manage the disturbance by providing planned respite.

Question 5b: Which, if any, factors do you believe to be the most important for us to consider with respect to re-centring and narrowing published NPRs to take account of aircraft performance on the modern PBN routes?

As noted above, the Council considers the key factor to be the opportunity to identify a number of routes within the existing Noise Preferential Routes in order to provide the opportunity for respite within the areas already affected.

Question 5c: What, if any, comments or suggestions do you have about the proposals for Gatwick Airport Ltd to consider re-centring and narrowing published NPRs to take account of aircraft performance on the modern PBN routes (please provide any views you have on what the optimal width for NPR swathes should be)?

SDC responded to the previous 'London Airspace Consultation' to say that it does not consider that the primary objective of this review should be making best use of the existing runway. Instead, the objective must be to balance this with reducing the number of people and businesses significantly affected by aviation noise and the impacts on those people and businesses that will remain affected. This remains the case.

Question 6a: Should we implement shortened NPRs to take account of the observed climb performance of the flights at Gatwick Airport?

The length of NPRs should be set in relation to ground noise monitoring rather than observed climb. This would better take account of the thrust required to get aircraft to certain heights and the noise impact of this. SDC is supportive of restrictions and meaningful penalties being introduced to ensure that aircraft approach Gatwick at their maximum safe height at all times of the day.

Question 6b: Which, if any, factors do you believe to be the most important for us to consider when determining whether to implement shortened NPRs to take account of the observed climb performance?

SDC has no further comments to add to those in its response to 6a.

Question 6c: What, if any, comments or suggestions do you have about the proposals for Gatwick Airport Ltd to consider when determining whether to implement shortened NPRs to take account of the observed climb performance of the flights at the Airport?

SDC has no further comments to add to those in its response to 6a.

Questions 7a-c: These questions relate to departures to the west when the airport is in RWY26 mode (departures to the west; arrivals from the east)

These proposals do not directly affect areas in Sevenoaks District and SDC has no comments to make.

Question 8a: Should Gatwick Airport Ltd consider NPR swathes with variable widths, dependant on sharpness of turns on each route, as a more accurate portrayal of where aircraft actually overfly?

Question 8b: Which, if any, factors do you believe should be the most important for us when considering NPR swathes with variable widths, dependant on sharpness of turns on each route, as a more accurate portrayal of where aircraft actually overfly?

Question 8c: What, if any, comments or suggestions do you have about whether we should consider NPR swathes with variable widths as a more accurate portrayal of where aircraft actually overfly?

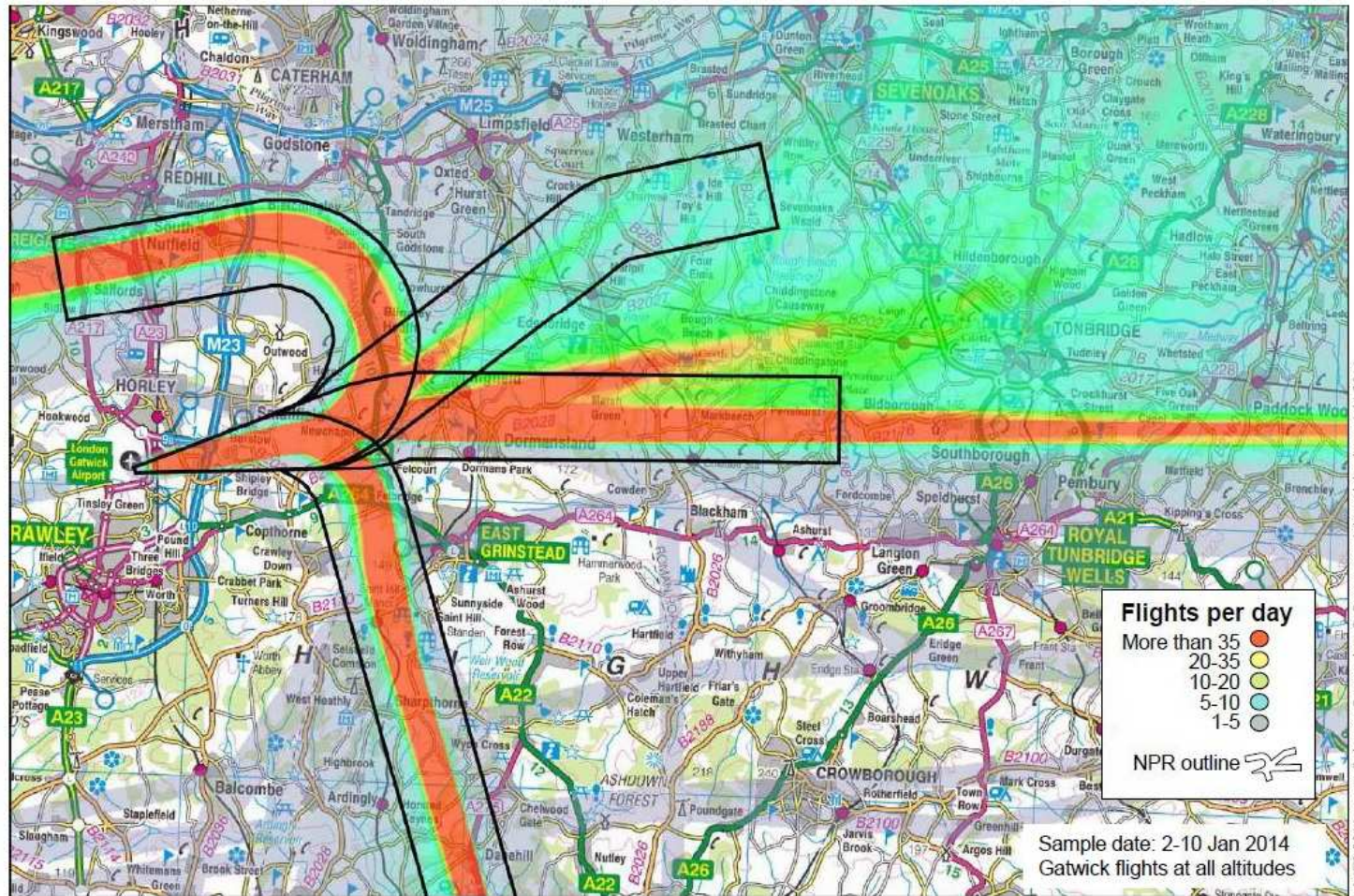
Noise preferential routes should be set with regard to noise impacts on the ground, which should be established by ground level monitoring.

Question 9: What, if any, additional comments do you have that are relevant to this consultation and that you would like to make?

SDC has no further comments but would like to reiterate a number of key general points:

- SDC does not consider that the primary objective of this review should be making best use of the existing runway. Instead, the objective must be to balance this with reducing the number of people and businesses significantly affected by aviation noise and the impacts on those people and businesses that will remain affected.
- Decisions on preferred flights paths should be made with the benefit of ground noise data.
- Night-time respite should be introduced by placing severe limitations on all night flights (arrivals and departures) at Gatwick and a meaningful period should be introduced in which there are no flights (for example 12AM to 6AM).
- A number of narrower preferred routes should be identified (and published for consultation) for both arrivals and departures within the existing NPRs and the existing 'main' arrival swathes. This would not increase the number of people affected from current levels but may help to manage the disturbance by providing planned respite.
- Restrictions and meaningful penalties should be introduced to ensure that aircraft approach Gatwick at their maximum safe height at all times of the day.
- Effective use should be made of non-regulatory instruments such as differential landing fees to reduce night time noise further.

Appendix A: Current Noise Preferential Routes and Flight Density Plots for 'Runway 08' Departures



Map 25: existing RWY08 NPR and flight density plots to the east/north east

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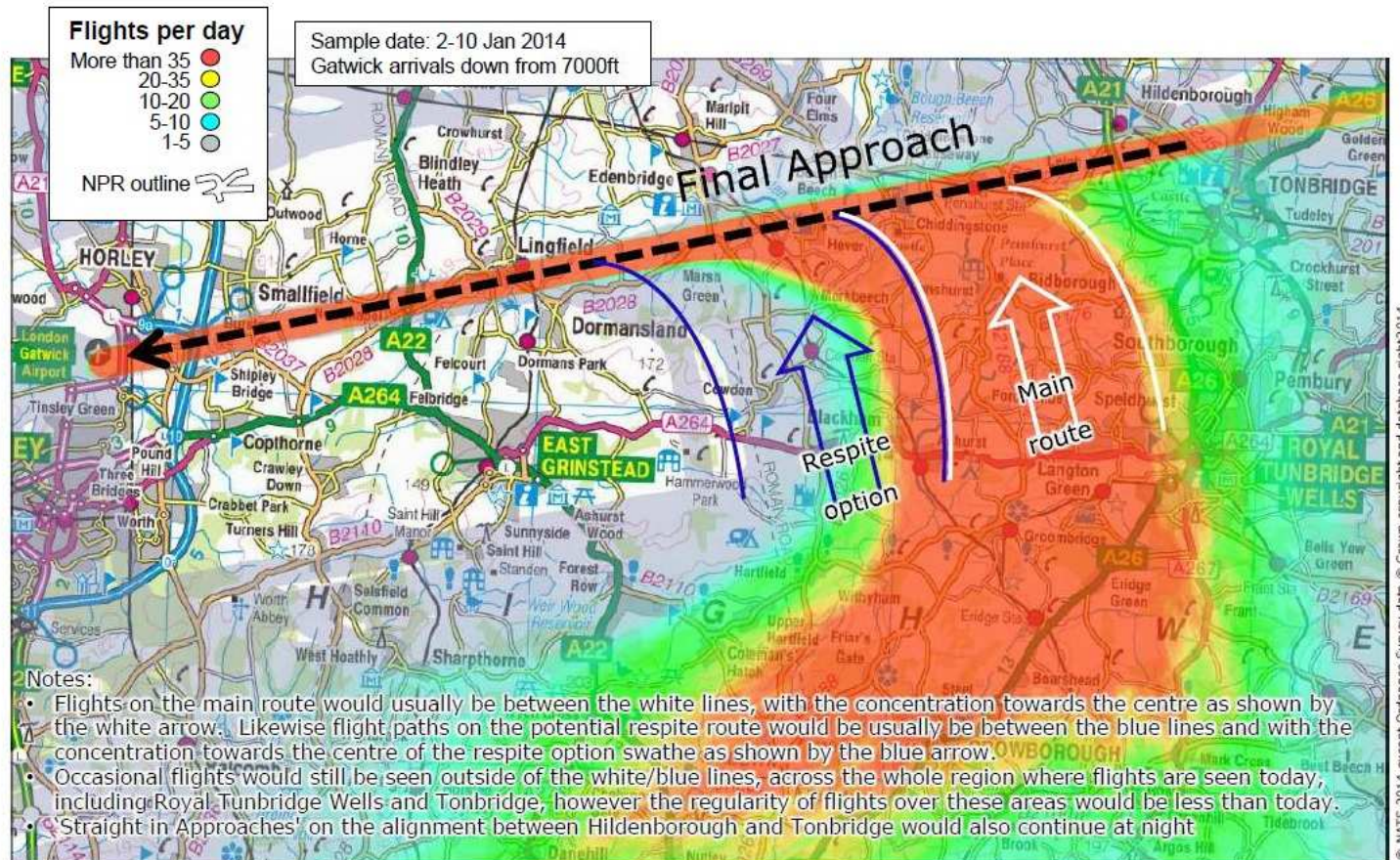
Appendix B: Proposed Route Centreline for 'Runway 08' Departures and Existing Noise Preferential Route Outlines



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Map 26: RWY08 route centreline compared to existing NPR 1:250k

Appendix C: Existing Arrivals Flight Density Plots and Proposed Respite Options



Map 34: RWY26 arrivals and respite option overlaid existing RWY26 arrivals flight density plots (below 7,000ft, 1:250K background)

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