

## **GATWICK RNAV 1 SIDs AIRSPACE CHANGE PROPOSAL**

Regarding proposals to change the departure routes from Gatwick, I formally object to the:

- cancelling of the LAM Noise Preferential Route
- changes to the BGN/CLN/DVR Noise Preferential Route
- Route 4 changes to the north of airport
- effectiveness of the Consultation process
- statement that *'There is no change to existing controlled airspace'*
- freedom given to Gatwick to be both Judge and Jury

Dear Mr Swan (Director, Airspace Policy,CAA)  
(cc Mrs Anne Weston (UK Airspace Policy, DfT)

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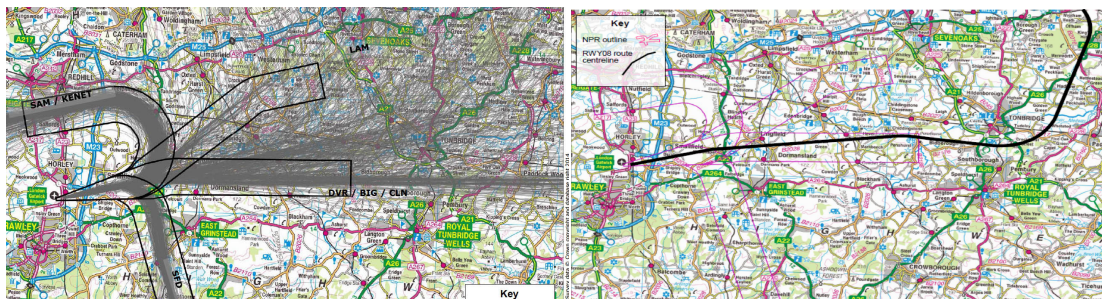
I write in reference to the CAA's Post Implementation Review of departure routes from Gatwick, for which you have agreed to accept submissions from the public until 5<sup>th</sup> January 2015. Thank you for that.

### **Grounds for Objection**

- 1. Cancelling of the LAM Noise Preferential Route**
- 2. Changes to the BGN/CLN/DVR Noise Preferential Route**

10 Downing Street wrote to me on 2<sup>nd</sup> December stating, that *'As respite is not currently defined in Government policy, the Government expects airports to engage with local communities to design a solution [to flight path noise] that fits local circumstances'*

The changes proposed which you are reviewing fail to reflect that direction from the Prime Minister's office as the plans below, (taken from Gatwick's website) demonstrate that no respite is envisaged for those over flown by the new departure superhighway. (I fully accept that this direction came some 15 months after your initial 'Decision' but it does come within your review period).



Indeed the proposals shown above can only lay claim to creating a noise ghetto from the incessant flights overhead, focused as they are on a continuous narrow path some 500m wide.

You may argue that Government policy is to *'limit and, where possible to reduce the number of people in the UK significantly affected by aircraft noise'*

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/153776/aviation-policy-framework.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/153776/aviation-policy-framework.pdf)

However **it explicitly does not state** that all flights for any given route should be concentrated over a narrow 500m width, leading to the inevitable persecution of the minorities below.

I discussed this very issue at the Department for Transport in November, following which the Secretary of State, The Rt. Hon. Patrick McLoughlin wrote to me advising *'...in the meeting you made some strong points on what we recognise is a complex issue which needs to be considered further. I wish to assure you that officials are looking into the question of concentration versus dispersal...'*

(Both letters available on our website [www.gatwickobviouslynot.org](http://www.gatwickobviouslynot.org))

You may question my use of the term 'incessant' and whether it is justified. It is, and for this reason; the proposal for this single superhighway for Easterly departures means that on the days the *arrivals* are not from the East into Gatwick, the *departures* will be in place to the East, hence ensuring 100% noise affliction for those under the departure route as **much of the proposed departure superhighway shown above mirrors the arrivals route**. This 'incessant' noise is also compounded by the fact that Air Traffic Control often send departures on the same routes East as arrivals going West on the same day at the same time, simply at different altitudes.

This is manifestly unjust.

### **3. Route 4 changes to the north of airport**

On both Easterly and Westerly departures (depending on the wind direction), planes then double back on themselves if they need to go West or East for their final destination.

This inevitably means those overflowed have no escape from aircraft noise. Compound this with the inability of some aircraft to stay within the Noise Preferential Routes (accepted in your Decision Letter) and it means many more newly overflowed people are affected. This is contrary to Government guidance.

RWY26 DVR/CLN/BIG/LAM must revert to being within the existing Noise Preferential Route and any changes to this NPR rejected.

### **4. The (in)effectiveness of the Consultation process**

In your 'CAA Decision Letter' of 14<sup>th</sup> August 2013 you say that *'The overall assessment of the consultation process by the CAA was that it was satisfactory and I am content that it met my requirements.'*

[http://www.caa.co.uk/docs/2111/20130814DecisionLetterLGW\\_RNAV1\\_SIDs.pdf](http://www.caa.co.uk/docs/2111/20130814DecisionLetterLGW_RNAV1_SIDs.pdf)

However you admit that only 5 objections were received to these proposals for Route 5. I suggest this is from lack of dissemination and hence knowledge, not from lack of objection and all the proposals you are reviewing **must be halted until a full and proper Consultation is enacted.**

We experienced the very same issue with Gatwick's 'Consultation' in the summer of 2014 – a consultation deemed '*unfit for purpose*' by a Cabinet minister and subsequently halted due to public 'resistance', according to the CAA's Peter Gardiner

*'You will have seen in the news however that Gatwick have postponed such a submission for change following significant local resistance'*

Peter Gardiner, Business Manager to the Chair and CEO, CAA, 1st October 2014

We stumbled over that Consultation very late in the day, immediately formed a Campaign group and alerted the villages and towns all around us to the devastating proposals. Gatwick have just released the final report and analysis for this Consultation and it clearly shows that it was through Campaign groups, not Gatwick's dissemination, by which people became aware of that Consultation. The table below shows that 'planes over penshurst' (which evolved into 'gatwick obviously not') and several other campaign groups were responsible for the great majority of responses.

Similarly the Consultation for the changes you are now reviewing went by almost silently.

**It simply failed in its single duty to 'consult' those who would be affected by its proposals.**

Table 3.2 Organised campaign responses submitted as part of the Gatwick Local Area Consultation				
		Total Responses	Email and Post	Online
Campaign 1	Planes Over Penshurst	1,347	1,338	9
	Map 1 - Chiddingstone	271	271	0
	Map 2 - Penshurst	595	595	0
	Map 3 - Broad Swathe	481	472	9
Campaign 2	CAGNE	1,223	271	952
	CAGNE	569	33	536
	CAGNE East	632	216	416
	CAGNE – Requested not to be part of campaign	22	22	0
Campaign 3	Gatwick Obviously Not	193	193	0
	Formal Complaint to CAA	181	181	0
	Delivery Discussion Paper	12	12	0

<http://www.gatwickairport.com/business-community/aircraft-noise/consultations-and-schemes/airspace-consultation/> 'Appendix 1 Main Report'

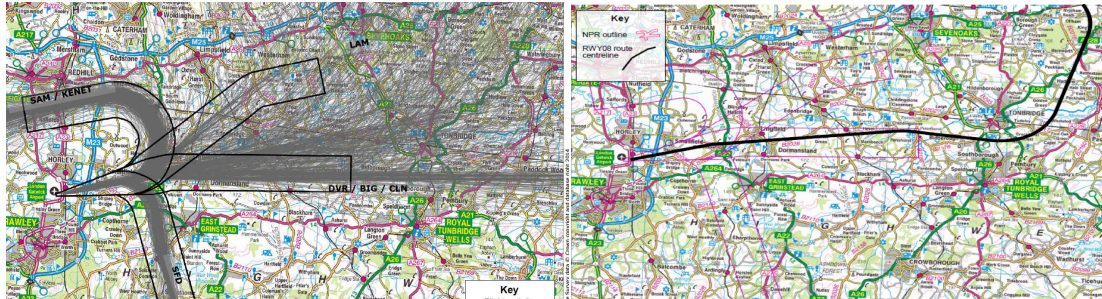
Indeed in your Letter, for Route 4 you admit that '*Feedback from the consultation for this route was extremely low; one member of the public from Leigh objected due to the prospect of additional noise resulting from concentration of more aircraft overflying his village*'

One person! Does this not demonstrate the woeful effectiveness of the Consultation? If the proposal goes ahead, Leigh village will be over flown either by arrivals or by departures depending on the wind direction – do you not consider that if only 1 person responded to this devastating proposal that perhaps word had not go out?

## 5. 'There is no change to existing controlled airspace'

para 3.4.1.,CAA Decision Letter, 14<sup>th</sup> August 2013, Mark Swan

[http://www.caa.co.uk/docs/2111/20130814DecisionLetterLGW\\_RNAV1\\_SIDs.pdf](http://www.caa.co.uk/docs/2111/20130814DecisionLetterLGW_RNAV1_SIDs.pdf)



No change to airspace? Take another look at these plans. Are you sure? Common sense suggests otherwise. I will leave this issue for you to ponder over as our legal team are looking into challenging the CAA on this and it may shortly become sub judice

## 6. Freedom for Gatwick to be both Judge and Jury

I quote again from your 'CAA Decision Letter' of August 2013,

*'2.4 A post implementation management oversight process proposed that should any RNAV1 SID be deemed to be of detrimental effect, it could be withdrawn. The CAA has asked GAL to confirm these arrangements and provide clarity on what GAL deems to be a detrimental effect.'*

This is a very simple one to argue; I totally refuse to accept that it is right, fair or just to allow Gatwick – of all people! – to decide what is a 'detrimental effect' upon the thousands of people who will suffer severe and repeated noise disturbance (if the CAA accept the proposals) as a result of their drive for greater and greater income on which they pay no Corporation Tax and which is destined for offshore havens.

**Please advise: Where is the incentive for them to fairly judge what they 'deem to be a detrimental effect'?**

Perhaps you should ask the people potentially overflowed what they term to be a 'detrimental effect' – via a full and proper Consultation?

While this is the final one of six grounds of objection, I see it as perhaps the most important as it clearly demonstrates the flawed process upon which all the other decisions have been based – the 'Consultation'

Yours sincerely

Martin Barraud

Leader

gatwickobviouslynot.org

