

Gatwick Area Conservation Campaign

GACC

**Campaigning for a better environment
for the whole area around Gatwick**

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The Gatwick Arrivals Review

A Response

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1. GACC, founded in 1968, has as members about 100 councils and community groups together with a growing number of individual members. All the councils, groups and individual members pay us an annual subscription. The community groups range from village amenity societies, through local flight path protest groups, to large environmental organisations such as CPRE Surrey, CPRE Sussex and CPRE Kent each of which has over 2,000 members.
2. Because we rely on calm, rational arguments, and because we represent the whole area around the airport, we have always had strong support from all the local members of Parliament and a substantial influence in Whitehall.
3. We welcomed the decision by Gatwick to set up the independent Review, and we welcomed the appointment of Bo Redeborn and Graham Lake to conduct it. We are satisfied that they have done so in an entirely independent and knowledgeable way. Their report was clear and constructive. In general we welcome the decision by GAL to accept all the Review recommendations. And we are pleased that Bo Redeborn and Graham Lake are to have a continuing role in ensuring that they are implemented.
4. Because we represent the whole area, and because we have members all over, we have always been careful not to support, or oppose, plans to move flight paths from one place to another. For that reason we decided to remain at arms-length from the Review. But that does not preclude us from commenting on the proposals.

5. This response has been approved by our committee. We have sent it in draft to all our members and to our 100 member councils and community groups, inviting their comments which have been incorporated.

A second runway?

6. We consider that a major failing of the Arrivals Review is that there is no discussion of how the situation would be altered if a second runway is built. This is almost deliberately misleading when GAL are spending millions of pounds lobbying for the new runway; and when they are publicly announcing their confidence that they will succeed. According to GAL and to the Airports Commission the aim is to double the number of aircraft using Gatwick: that would clearly negate the comparatively small benefits which will result from the Review proposals.

A wider swathe

7. The recommendation to widen the approach swathe from four miles wide (10-14 miles) to six miles wide (8-14 miles) is welcome, and will partially meet the demand from many local groups for a more fair and equitable distribution of flights.
8. The fundamental flaw in this proposal is, however, that there is no mechanism to achieve a fair and equitable distribution of flights across the full width of the swathe. In the past a random distribution of flight paths was achieved because aircraft arrived at haphazard times and were given varying routes in order to arrive at the runway at the correct time. But it is uncertain whether this will be replicated in future.

Cutting the corner

9. Since there is no mechanism to achieve a fair distribution within the swathe, there will be temptation for air traffic controllers where possible to bring flights in by the shortest route in order to maximise the use of the runway, and an incentive to pilots to use the shortest route in order to save time and fuel. Aircraft taking the shortest route will be lower and thus noisier. The noise will also affect communities closer to the airport. That is the fear expressed vehemently by the local protest group CAGNE to the west of the airport.¹ It is a valid anxiety which needs to be addressed.
10. Conversely there is a possibility - since NATS has stated that concentrating flights within the current 10-14 mile swathe enables them safely to maximise the use of the runway - that air traffic controllers will continue to direct almost all aircraft on current routes.
11. There are indications in the Review that air traffic controllers will be given encouragement to make greater use of the straight-in routes, especially at night. But it should not be assumed that this option is painless. GACC is already aware of

¹ There is no reciprocal local group to the east: from 2009 to 2012 there was a strong group 'Gatwick Can Be Quieter' based on the Marsh Green / Hever area which was disbanded when the ILS join point was moved further out.

complaints from villages to the east of Tunbridge Wells.

12. Because it is proposed that the distribution of flights will be left to the discretion of air traffic control, it is not feasible to produce maps in advance, and this adds to public anxiety. Maps showing how the new system is working should be published monthly, and should be reviewed by the Noise Management Board.

Timed arrivals

13. We note the recommendation to explore whether the system of timed arrivals (XMAN) can be deployed at Gatwick as it is already at Heathrow. Adjusting the speed of aircraft so that they arrive at the airport at exactly the time that a slot becomes available would be welcome in that it would reduce the need to stack, thus reducing noise and CO₂ emissions.
14. On the other hand, in the absence of any mechanism to ensure fair distribution of arrivals, it might tend to result in a single concentrated approach path to the south of the glideslope.
15. No timing is given for the introduction of XMAN but since it is already in operation at Heathrow it may be deployed at Gatwick soon. NATS will need urgently to devise a procedure whereby aircraft arriving under the XMAN system have their times of arrival varied so that they achieve a fair distribution across the full width of the swathe.

P-RNAV

16. We note that satellite navigation, P-RNAV, is likely to be introduced for Gatwick arrivals after 2022 but with the design of the new system taking place over the next few years. We also note the new CAA Guidance on the design of such routes states that multiple arrival routes 'would not be used to disperse traffic as ATC would operate one route at a time but those routes could vary throughout the day or week.'² We would support a respite option with each route used on a different day of the week, announced well in advance.
17. The CAA Guidance also states that 'at 3000ft relief routes would need to be at least c.1km away to be perceptibly quieter, c.2km away to be half as loud and c.4km away to be considered 'much quieter'. That would seem roughly to confirm the assumption in the Arrivals Review that (on both the east and the west) there might be three such routes plus the straight-in route.
18. Although the division of arriving aircraft into four routes might appear to achieve a fair distribution, each one of these routes would be concentrated with each aircraft following exactly the same track. For those unfortunate to be underneath one of the new routes the situation would be intensely annoying (although of course not as bad as for those under the glideslope).
19. We welcome the assurance that there will be full consultation before the introduction of new PRNAV routes. This should include clear maps to show: how many routes; how they will they be placed; at what frequency per route; and at what height.

² <http://publicapps.caa.co.uk/docs/33/CAP%201378%20final%20March%202016.pdf>

Overlap with departure routes

20. An overlap of departure and arrival routes is inevitable close to the airport but a possible adverse effect of the wider swathe could extend this problem to some areas south of the glide-slope, so that those overflown get no respite. We are therefore glad to see that GAL and NATS are to review this.

Time based separation

21. This is a procedure for reducing delays when there is a high wind. As such it is all to do with increasing the capacity of the airport, and nothing to do with noise reduction. A more simple solution would be to reduce the number of aircraft scheduled to use Gatwick. Since Stansted is only half full that would cause no problem.

Airbus 320

22. We welcome GAL's agreement to set a 'sunset date' for Airbus 320 aircraft not fitted with the noise reducing modification by December 2017, with a financial penalty thereafter on non-compliant aircraft. But this entirely depends on the severity of the financial penalty. Previous experience has shown that GAL is unwilling to impose any penalty which might result in loss of business. We suggest that airport charges on non-compliant aircraft should be doubled, and doubled again each subsequent year.

Start CDA higher

23. We welcome GAL acceptance of the recommendation to raise the start of CDA approaches from 6,000 feet to 7,000 feet and subsequently to 8,000 feet. This will mainly benefit people living at 18-25 miles from the airport.
24. We also welcome the intention to improve CDA procedures. At present an aircraft which descends at 1^o instead of the correct 3^o is counted as achieving CDA.

Stacks to be moved

25. Moving the Gatwick stacks out over the sea will benefit the South Downs National Park and also the Heathfield - Battle area. GACC members from that area regularly tell us how annoying the stack is. But it is disappointing that the only action proposed by GAL is to discuss this proposal with the DfT and CAA.

Point-Merge

26. We were pleased that the Arrivals Review recognised that this system would create 'absolute concentration of noise at the merge point' and therefore did not recommend it. It is disappointing that cancellation of the point-merge system was not included in the GAL response; indeed point-merge is not mentioned at all. This will cause continuing anxiety in the Haywards Heath - Crowborough area.

Night flights

27. It was surprising that night flights were almost excluded from the Arrivals Review. Indeed the proposal to widen the swathe does not apply at night. Night flights account for a disproportionately large part of the annoyance caused by arriving aircraft. The only recommendation concerned delayed flights which represent a tiny proportion of the total.
28. At the time of the last DfT consultation (end 2013) we warned that the unused headroom in the quotas would permit an increase in both the number and noise; and this is exactly what has happened. It is disappointing that the Government decision to make no change in the quotas since 2012 has meant that the previous steady annual reduction in the noise quota has been put on hold.
29. The DfT are due to undertake a new consultation this year. GACC will be making the case that ideally all night flights should be banned, and that until that can be achieved there should be a steady annual reduction in the quotas.

Planning

30. The recommendation that local councils should be better informed about aircraft noise when deciding where to locate houses, schools etc is misconceived. Houses and schools should last at least 100 years but flight paths are changed more frequently. For example, in the past two years departure route 4 has moved north and is now being moved back; the arrivals review itself recommends a change in arrival flight paths; and most important of all, how can councils be expected to take account of the flight paths related to a potential second runway when GAL refuse to publish where the new routes would be?

Complaints

31. We understand the problem that modern IT can enable one individual easily to record multiple complaints, and that this may skew the statistics. Nevertheless the decision by GAL to record only one complaint a day per person caused widespread anger, frustration and derision. People may well be irritated every time an aircraft passes overhead, and therefore submitting many complaints per day is a perfectly valid way of registering their annoyance.
32. We are therefore glad that GAL has agreed to improve the system and to employ more staff in the complaints department.

Noise Management Board

33. We support the concept of a Noise Management Board (NMB); and support Bo Redeborn as chairman and Graham Lake as Secretary. In the Arrivals Review it was implied that the NMB would have executive power, but it has now become clear that this is not so: instead it is hoped that it will 'provide an authoritative voice'. There is a risk that it may come to be seen as a mere 'talking shop.'

34. We suggest that:

- The NMB should in due course also deal with departures;
- The NMB should be combined with the existing Gatwick noise committee, NATMAG, in order to avoid duplication and muddle;
- Meetings of the NMB should be open to the public, with arrangements, as in council meetings, for limited public speaking;³
- Agenda and minutes should be made available to all interested parties;
- The NMB should meet quarterly to fit in with the cycle of meetings of GATCOM.

35. There is at present uncertainty about the role of borough and district councils (which often have the most expertise on noise issues). There is also confusion about the process of nominating the two community representatives. We hope this can be sorted out before the meeting on 18 May.

36. Instead of 'community representatives' we suggested that the NMB should report to regular seminars to which all the protest groups and members of the public could be invited. This should be a proper report on the implementation of specific proposals. We still consider that this would be the best solution for ensuring wide community representation, although to some extent this purpose would be met if NMB meetings were open to the public.

³ Procedure at different councils varies. Public question time may take place before or after a meeting. At planning committees it is normal practice to allow short speeches by the applicant and by objectors. Permission to speak may be required in advance.