

## **London Airspace Change – Gatwick Local Area Consultation**

### ***Response from Kent County Council***

David Brazier, Cabinet Member for Environment and Transport, Kent County Council  
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Kent County Council (KCC) welcomes the opportunity to respond to this consultation; however, has only sought to answer questions that affect Kent; and provides some general comments on this consultation.

This consultation has caused considerable stress and anxiety among residents in West Kent who feel that these airspace changes are being forced upon them. This consultation process, although accessible to those with some grasp of the technical issues, is highly inaccessible to the majority of the general public. KCC urges that Gatwick Airport Ltd embarks on a full engagement process directly with local people to alleviate their fears and take their views into account. This requires meeting with district and parish councils and visiting the communities that will be affected.

KCC raises a number of issues in its response to the consultation questions, including the contradictory position on single precision arrival routes versus dispersal of arrivals within a swathe before joining the final approach.

Although outside of the scope of this consultation, KCC would like to reaffirm its opposition to the large number of flights permitted at night as made clear to the Department for Transport (DfT) in its consultation on the night flying regime at designated airports last January.

In addition, alongside the technological advances in Performance Based Navigation (PBN) which have, in part, stimulated the proposals in the London Airspace Consultation, KCC urges that similar technological improvements should be investigated for increasing the angle of descent so that the geographical spread of noise impacts from the airport is reduced.

Technological improvements could also address specific issues with certain aircraft airframe noise. These retrospective modifications should be made to the applicable aircraft so that communities under flight paths can feel some improvement from the technological advances that so far only the aviation industry appears to be benefiting from.

**Q2a: 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?**

It is appreciated that effort has been taken to attempt to avoid settlements with the proposed realignment for RWY08 departures to the east of Gatwick, which will be beneficial to many communities. However, there will be those who are over-flown all of the time when on easterly operations, due to the concentration of flights with Performance Based Navigation (PBN); and Kent County Council (KCC) is opposed to this principle of concentration.

We acknowledge that concentration is Government policy in the Aviation Policy Framework (APF), albeit it should be pointed out that there is a caveat in the APF that states that “*in most circumstances*” it is desirable to concentrate aircraft along the fewest number of specified routes. “*In most circumstances*” does not mean that it has to apply in *all* circumstances and KCC argues that given the rural nature of the area around Gatwick, flight paths should be shared on a more equitable basis. KCC does not believe that concentration in every circumstance is an acceptable method of achieving the overall Government aviation noise policy objective to limit, and where possible, reduce the number of people affected by aviation noise.

If concentration of flight paths is the consequence of PBN, intended or otherwise, the technology should also be used to devise multiple precision routes so that respite is provided across the area within the departure swathes. This would go part way to relieving communities under the currently proposed single departure PBN route; as they would not have to suffer noise from direct over-flight of every single aircraft departure when on easterly RWY08 operations.

**Q2b: 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?**

KCC could not possibly select the most important factors that are listed in the consultation document as this would depend on individuals’ viewpoints and how they are personally impacted by aircraft over-flight. This information should be obtained by a widespread survey of individual households under the proposed flight paths.

**Q2c: If we were to implement the proposed route, what width Noise Preferential Route (NPR) swathe do you think is most appropriate?**

Given KCC’s opposition to concentration of flight paths, we could NOT endorse a narrowing of the width of the NPR that would surround the concentrated departure route. The 3km width of the NPR should be maintained and remain within its existing area.

**Q2d: If you answered question 2c, what were the reasons for your choice?**

Noise Preferential Routes (NPRs) have long been established, therefore any changes to the boundaries will cause distress to those newly affected and this is not acceptable.

**Q2e: What, if any, comments or suggestions do you have about the proposals for the realignment for RWY08 departures to the east/northeast?**

See comments in response to the main question on this issue in Q2a.

**Q3a: 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)?**

It is appreciated that the main arrival route for westerly RWY26 arrivals has been positioned to avoid the main population centres of Tonbridge and Royal Tunbridge Wells; and the consideration of attempts to reduce noise over Hever Castle is welcomed. However, the concentration of arrival routes into one main route is opposed by KCC. In respect to Hever Castle, the improvement would only be noticeable if aircraft joined the final approach to the west of the Castle so that this important heritage attraction is not over-flown; and the same applies to other heritage attractions such as Penshurst Place, Chiddingstone Castle and Chartwell, amongst the many attractions in West Kent.

Similarly, although we welcome the provision of a respite route, the concentration of this into only one route is not supported; and the position of the respite route over areas that currently experience low levels or no over-flight, will expose new populations to noise. The Aviation Policy Framework (APF) clearly states that *“it may be appropriate to explore options for respite which share noise between communities on an equitable basis, provided that this does not lead to significant numbers of people newly affected by noise”*; therefore the positioning of this respite route does not adhere to Government policy.

The respite route is also at night, therefore as well as exposing new populations to noise, will also be doing so at night when aircraft noise is most intrusive as it disrupts sleep. Night flights are not acceptable to KCC, unless restricted to the ‘shoulder’ periods at the very start and end of the night time period or for flights that have significant economic value to the UK and cannot practically arrive at other times, i.e. flights from long haul destinations but not short haul leisure flights.

The proposed respite route, along with its problems of exposing new populations to noise and only being at night time, is then further compounded by the need to amend the Department for Transport (DfT) noise abatement requirements with aircraft being lower than the specified 3,000ft at 10 nautical miles from the airport on joining the final approach. Therefore aircraft will also be very low over people's houses at night time that were not previously (or very rarely) flown over before – this is unacceptable to KCC.

Aircraft should be kept as high as possible to reduce the noise impact on the ground, therefore KCC does not support any initiative that would permit aircraft to be lower than existing guidance, especially given that it is at night; and turning aircraft at lower altitude will then create even more noise as they join the final approach. That said; as stated in the DfT Guidance to the Civil Aviation Authority (CAA) on the Environmental Objectives Relating to the Exercise of its Air Navigation Functions (January 2014); the principle of varying the point at which aircraft join the final approach in order to provide respite is supported, although not in the circumstances of the route proposed in this consultation.

Respite is a principle that KCC strongly supports, although as previously stated in relation to departures, arrivals respite could be implemented by making use of the PBN technology in order to devise multiple precision routes so that respite is provided across the area within the arrival swathes. This would go part way to relieving communities under the currently proposed single main and night-time respite arrival routes; as they would not have to suffer noise from direct over-flight of every single aircraft arrival when on westerly RWY26 operations. This type of rotating respite should be applied at different times of the day, not simply dual daytime and night-time routes.

The provision of a main route and respite route within two 'swathes' as presented in the consultation document is also misleading. Although it is acknowledged that arriving aircraft cannot be held on such a precise route as departing aircraft due to factors beyond the pilot's control, the consultation document implies that the main and respite route could be anywhere within the two swathes, or indeed outside the swathes in some instances, with the concentration of flights along the centre the displayed 'block arrows'.

It was KCC's understanding from Phase 1 of the London airspace consultation that PBN will allow a single precision route and one alternative respite route, despite KCC's request for multiple routes, which we were informed by Gatwick Airport Ltd and NATS – that it is too complicated to have more than two routes. If this is the case, then not displaying these single routes in this consultation and instead presenting the likely route with a 'block arrow' is deceitful; and is not alerting those under the precision route to the likely situation that they will find themselves in. If however, as stated in the consultation, it is that aircraft could be flown anywhere within the two swathes (or outside of them in some instances); then this alludes that it is possible to provide multiple routes so that the burden of over-flight can be spread and predictable rotating respite throughout the day and night is possible by varying the point at which aircraft join the final approach.

**Q3b: 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 arrivals respite route for RWY26 could be implemented?**

As stated in response to previous questions, KCC could not possibly select the most important factors that are listed in the consultation document as this would depend on individuals' viewpoints and how they are personally impacted by aircraft over-flight. This information should be obtained by a widespread survey of individual households under the proposed flight paths.

**Q3c: 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?**

See comments in response to the main question on this issue in Q3a.

**Q5a: Should Gatwick Airport Ltd re-centre and narrow the published NPRs to take account of aircraft performance on the modern Performance Based Navigation (PBN) routes in place at Gatwick Airport?**

As stated in response to questions 2c and 2d, given KCC's opposition to concentration of flight paths, we could NOT endorse a narrowing of the width of the NPR that would surround the concentrated departure route. The 3km width of the NPR should be maintained and remain within its existing area.

**Q5b: Which, if any, factors do you believe to be the most important for us to consider with respect of re-centring and narrowing published NPRs to take account of aircraft performance on the modern PBN routes?**

Similar to previous questions that required respondents to select the most important factors, KCC could not possibly select factors that are listed in the consultation document as this would depend on individuals' viewpoints and how they are personally impacted by being within an existing NPR or potentially being within a new NPR. This information should be obtained by a widespread survey of individual households under the existing and proposed NPRs.

**Q5c: 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 on what the optimal width for NPR swathes should be)?**

As previously stated in response to questions 2c and 2d, Noise Preferential Routes (NPRs) have long been established, therefore any changes to the boundaries will cause distress to those newly affected and this is not acceptable.

**Q6a: Should we implement shortened NPRs to take account of the observed climb performance of the flights at Gatwick Airport?**

Shortened NPRs could have benefits if all aircraft have climbed to above 4,000ft by the time that they reach the end of the shortened NPR. However, if this is not the case for all aircraft, there could be a situation whereby departing aircraft, having not attained 4,000ft altitude by the end of the shortened NPR, will then be directed to continue climbing along any route rather than within a full length NPR as is currently the case. However, with PBN this should not occur and aircraft should remain on a course that falls within the NPR, therefore on this basis and on the basis of our response to previous questions on narrowing of the NPR, KCC's position is that NPRs should remain as they are.

**Q6b: 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?**

As previously stated, KCC could not possibly select the most important factors that are listed in the consultation document as this would depend on individuals' viewpoints and how they are personally impacted by being within an existing NPR or potentially being within a new NPR. This information should be obtained by a widespread survey of individual households under the existing and proposed NPRs.

**Q6c: What, if any, comments or suggestions do you have about the proposal 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?**

See comments in response to the main question on this issue in Q6a.

**Q8a: Should Gatwick Airport Ltd consider NPR swathes with more variable width, dependant on sharpness of turns on each route, as a more accurate portrayal of where aircraft actually overfly?**

Given KCC's opposition to concentration of flight paths, we could NOT endorse a variable width NPR that would surround the concentrated departure routes. The 3km width of the NPRs should be maintained and remain within its existing areas.

**Q8b: 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?**

As previously stated, KCC could not possibly select the most important factors that are listed in the consultation document as this would depend on individuals' viewpoints and how they are personally impacted by being within an existing NPR or potentially being within a new NPR. This information should be obtained by a widespread survey of individual households under the existing and proposed NPRs.

**Q8c: 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?**

See comments in response to the main question on this issue in Q8a.

**Q9: What, if any, additional comments do you have that are relevant to this consultation and that you would like to make?**

Please see general comments at the start of this submission.