

# Gatwick Route 4 Redesign of RNAV SIDs

## Design Principles Review Response



## Document Details

---

Reference	Description
<b>Document Title</b>	Gatwick Route 4 Redesign of RNAV SIDs
	Design Principles Review Response
<b>Document Ref</b>	71248 031
<b>Issue</b>	Issue 1 Final
<b>Date</b>	7 <sup>th</sup> June 2019
<b>Classification</b>	

# 1 Responses

As one of our key stakeholders, London Gatwick Airport appreciates the time and effort you have invested in helping us to develop Design Principles to support the Route 4 airspace redesign project. We would now welcome any further comments you may have to help us further develop the shortlist of Design Principles. These principles will serve as the framework against which detailed design work may commence. An opportunity for further involvement will be provided during the design work, and again during the formal consultation, which will include a much wider group of aviation and non-aviation stakeholders.

Please mark your response to each of the questions below and provide any additional comments you wish us to consider.

Send your completed document to [lgwairspace.rte4@gatwickairport.com](mailto:lgwairspace.rte4@gatwickairport.com) by 1700 hours on 28<sup>th</sup> June 2019.

Thank you for your continued support.

## Question 1

Do you agree that London Gatwick Airport has developed its Route 4 Design Principles in full accord with the process detailed in CAP 1616, Step 1B?

Response  Yes  No

Additional Comments: Gatwick has not engaged with residents outside of the route or impacted by other routes in the west. As such this departure route so not giving consideration to the impact some of the design principles now have on other communities already impacted by departure, and in part, arrivals with no respite, has only to those currently impacted the engagement. This design principle stage has not given consideration to the totality of aircraft noise all communities suffer, it has only considered that of route 4 and 3, as such it is flawed.

## Question 2

Do you agree that the comprehensive list of Design Principles captures the specific areas of concern you have articulated in either a questionnaire or during participation in one of the focus groups?

Response  Yes  No

Additional Comments: Point 11 We can no support flying in line with M25 and A24 as people also live here and you could be flying over new people. This route should be inside the NPR flying over areas historically flown over.

Point 21 we strongly oppose

Point 23 night flights should be distributed in a fair and balanced fashion taking into account the totality of aircraft noise over other westerly routes caused by Gatwick Airport 24/7 operations as other areas to the west have no respite from Gatwick's noise.

Point 24 all areas are noise sensitive/ ANOB and so it is difficult to understand how this is a fair and equitable distribution of aircraft noise – surely all should share

An additional point is that Government policy is noise up to 7,000ft. We therefore do not accept Gatwick dismissing this as noise should be the number one consideration over distance and fuel burn in line with government policy.

Route 4 already has respite when Gatwick is in easterly operations

### Question 3

Do you broadly support our reasons for not including certain Design Principles in the short list? If not, please provide further comment.

Response  Yes  No

Additional Comments: Point 16 proposes to fly over areas that already impacted by route 1. These communities do not have respite from Gatwick's operations as it receives arrivals and departures. This does not give any consideration to the totality of noise that others suffer whereby this route already offers respite. This would also fly over new communities as it turns east.

**Question 4**

Do you believe any of the items selected for the shortlist of Design Principles are inappropriate selections? If so, please explain why.

Response  Yes  No

Additional Comments: We strongly oppose points 5, 6, 8, 11, 16 and 17 – NPR have been in place for over 60 years and you have not consulted these residents you are now proposing to fly over. This is fundamentally wrong!

In line with FASIS – we oppose impacting communities, especially new communities for resilience/ to avoid airspace delay as this currently means flying ADNID – over new communities.

**Question 5**

Do you agree with the prioritisation that we have applied to the shortlist of Design Principles? If not, please add any comments and use Table 1 on page 8 to provide us with your preferred prioritisation.

Response  Yes  No

Additional Comments: We oppose points 8, 11, 16 and 17 – table completed to the best of our ability as technical details are not provided on some points to allow for an informed comment.

The suggestion of using WIZAD illustrates how the engagement has been conducted only with those that are impacted by routes 4 and 3. WIZAD is not used even for safety reasons. If it were it would stop Gatwick flying over new communities with ADNID routes as is regularly operated by Gatwick due to resilience and weather. If WIZAD was used along with route 1, 7, and 8 it would sandwich those communities that already have the full totality of Gatwick's departure procedures, approx. 80% according to your document although it fails to mention that

these areas, in part, also receive arrivals so misleading residents engaged with who are concerned only with routes 4 and 3. For this reason this engagement is flawed and no consideration by Gatwick has been given to the totality of noise suffered by some communities that others seek to move noise over.

### Question 6

Are there other Design Principles not included in the long list list that you feel should be considered as candidates for the final shortlist? If so, please provide your comments.

Response  Yes  No

Additional Comments: Dispersal needs to be kept inside NPRs.

A newly designed route must stay within the NPR

CCO must not be used to fly over new areas as planes reach 4,000ft quicker closer to the runway, and noise of CCO needs to be considered as this impacts those closest to the runway eg Rusper, Capel, etc.

Sensitive areas and ANOBs must share the burden of noise if they have historically been flown over before.

This route already has respite

Night flights should be banned at Gatwick Airport

Noise must be the number one consideration over fuel burn.

### Question 7

Do you have any other comments on how the CAP 1616, Step 1B process has been conducted to date?

Response  Yes  No

Additional Comments:

This process is flawed as Gatwick has only engaged with those that already impacted by this departure route/ route 3. This allowing for design principles to go unchallenged in proposals to move noise from one community over another, eg route 1/ WIZAD, with no consideration to the totality of noise already suffered by other communities. Gatwick has strategically not allowed these communities to have a voice in the process by not engaging them. These design principles are not set out to be fair or equitable to all communities as it takes a departure route in isolation.

Below is an example of the biased format of this Design Principles ' **Table 1 on the next page lists the Design Principles initially prioritised according to the volume of responses (greatest volume at the top of the list) returned in questionnaires and from comment during discussions at the recent focus groups.'**

As communities to be impacted have not been engaged by Gatwick Airport they have not been given an opportunity to provide counter suggestions such as making all departures to the west fair and equitable in the number of planes flown on each route, for example in 2018 52,414 flew on routes 1, 7 and 8 (these communities also receive arrivals) and 34,946 flew route 4 that does not receive arrivals. If the routes were fair in departure routing then each route would have 21,840 flights a year, but if we take into account totality of flights then those under route 1, and in part 7 and 8, also receive on average 84,000 arrivals as well.

Table 1 on the next page lists the Design Principles initially prioritised according to the volume of responses (greatest volume at the top of the list) returned in questionnaires and from comment during discussions at the recent focus groups.

If you agree that the Design Principles have been prioritised correctly, then please indicate this by marking the table with a comment.

If however, you believe an item should have a higher priority, then please use the right hand column to indicate this.

Prioritised No (a)	Design Principle (b)	Your priority (c)
1	Route 4 options will be designed safely with full regulatory compliance	1
2	Designs should be built to manage dispersion below 7,000 ft	3
3	New Route 4 designs should give due regard to the historic routings in use before 2012	5
4	Designs should seek to minimize overflight of previously unaffected locations	2
5	Designs will seek to avoid overflight of notified noise sensitive areas	
6	Route 4 designs should seek to minimise the impact of adverse noise on the Surrey Hills AONB	
7	Route 4 designs should consider neighbouring airports procedures to ensure adequate deconfliction	6
8	Routes should include an extended westerly climb profile before a later easterly turn	oppose
9	Designs should not include respite options that place routes over newly overflown populations	4
10	Overflight protections already contained in the UK AIP must be maintained	
11	Route 4 procedures should follow M25 and A24 corridors where background noise already high	oppose
12	Designs should be built to concentrate dispersion below 7,000ft	7
13	Procedures should include RF legs	
14	ARINC 424 coding must ensure aircraft follow the desired lateral and vertical paths	
15	Routes should be designed to limit the wrap around turn to no more than 180°	
16	Route 4 designs must consider FASI-S objectives and ensure alignment	oppose
17	Route 4 designs should not be constrained by the lateral dimensions of the existing NPR to 4,000ft	oppose

Table 1 - Stakeholder Prioritised Shortlist of Design Principles

Thank you for completing this table.