

HIGH WEALD COUNCILS AVIATION ACTION GROUP (HWCAAG)

High Weald Councils Aviation Action Group consists of the constitutionally elected representatives of resident and business communities within the defined area boundaries of Bidborough, Chiddingstone, Dormansland, Hever, Leigh, Penshurst, Sevenoaks Weald and Speldhurst Parish Councils¹. The group represents a population of 18,031, and an electorate of 12,341 across the eight parishes.

This represents the agreed response to the consultation

LONDON AIRSPACE CHANGE – GATWICK LOCAL AREA CONSULTATION Issue 1, May 2014

HWCAAG wish to highlight some general points.

Firstly, we are extremely concerned at the proposal to narrow the current swathe within which arrivals for RWY 26 are channelled. Narrowing the swathe will intensify the frequency with which our community is subjected to the nuisance of over-flying. It is unfair, unjust and unnecessary to concentrate flights over any community within the controlled area. We challenge the rationale for the changes, including the notion of CO2 emission savings. Whilst the impact on our communities is already significant, as representatives of all communities in the area we believe we should continue to share the burden of overflight through defined multiple respite routes.

We have serious concerns about the “consultation” process. In our view, the stated purpose and formula for fair consultation have been ignored. Vital information has not been provided to stakeholders at the same time as their views were sought. Previous responses from stakeholders have been substantially ignored, particularly in relation to the overwhelming desire to ensure that one community is not unfairly blighted by aircraft noise. On question 11A of the previous airspace consultation ‘Making best use of Gatwick Airport Runway 26,’ of the 492 online responses from the public 86% did not support the proposal.

The consultation is not clear enough; it does not provide the right information from which to make an informed contribution and in our view should not be considered a basis on which to make further decisions on airspace management. Given this is the second attempt at this process it is our view that this is a deliberate obfuscation which renders this consultation invalid

The stated primary objective of the Point Merge proposals is to increase runway efficiency, so that another 5 flights can operate each hour. In our opinion, the resulting CO2 emissions from increased flights will be substantial adding tens of thousands of tons to the millions already produced by aircraft movements from GAL and negating any alleged CO2 emission benefits of the Point Merge system.

HWCAAG response to questions:

Question 1a: Which ONE of the SIX alternative proposed options, if any, do you believe provides the best balance of benefits for RWY26 departures?

For questions 1a, 1b, 1c & 1d we believe that as these proposals are not relevant to our area, they are best responded to by those affected.

¹ Councils to be added on receipt of minuted endorsement of this response by any Council who wish to support this response.

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?

We do not support the alignment that has been drawn up on the basis of feedback from Kent County Council and other stakeholders. This alignment is shown in Maps 26 and 27 and in the forecast route usage as shown in Table 7 and the Population Counts as shown in table 8. Our opposition is based on the 500m NPR indication that a negative population figure of - 3900 will be achieved by imposing an intolerable burden on those who remain overflown. We advocate maximum respite routes within the controlled airspace area.

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?

This list is not in order of priority or represents an exclusive list, we believe that many factors should be taken into account including:

- Noise that affects health
- Noise at night that disturbs people's sleep
- Noise in the day that impacts people's quality of life
- Noise in the daytime that affects our schools and community facilities
- Noise over Areas of Outstanding Natural Beauty, National Parks and historic houses and gardens

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

We support the most practical width that causes the least disturbance to those being overflown. This can be achieved either through the widest possible NPR but preferably through multiple narrow NPRs in the designated controlled airspace in which people are already affected.

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

It is the agreed position of the councils that maximum respite should be offered to the overflown. In our view that can be achieved by multiple narrow NPRs to ensure maximum respite.

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)?

We do not consider that a single respite route is appropriate. Our position is that multiple respite routes should be considered. The map is very misleading as a 500m NPR would have a dramatically different impact to the version shown. In the original consultation question 'On Arrivals Based on Point Merge at Gatwick,' of the online responses from the public only 8.5% strongly supported Point Merge, 17% tended to support but almost 75% did not support Point Merge.

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 position of the councils is that the best form of respite is to have a zero quota between midnight and six am.

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?

The change to the noise abatement requirements that is required is to challenge that the fewest number should be affected. The requirement should be no increase in noise burden of any of those in the controlled area, this should be achieved by multiple narrow NPR across the controlled area and by the enforcement of aircraft flying at their maximum safe height until landing.

Questions 4a, 4b, 4c are not relevant to our area and are best dealt with by those affected.

Question 5a: Should Gatwick Airport Ltd re-centre and narrow the published NPRs to take account of aircraft performance on the modern PBN routes in place at Gatwick Airport?

The NPR should be maintained and respite routes run within it using the new technology in order to reduce the noise burden. Simply narrowing of NPRs leads to a higher concentration of noise for a minority of residents; GAL should not go ahead.

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?

Respite and enforcement.

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)?

There should be multiple narrow NPR over as broad an area as possible

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

A shortened NPR should not be based on observed climb but on ground noise monitoring. The current regime of monitoring and enforcement is unsatisfactory until the noise on the ground is understood any shortening of the NPR would be arbitrary.

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?

NPR swathes should indicate actual noise impact from over-flights of nearby areas and not of observed climb performance.

GAL Questions 7a, 7b and 7c are not relevant to our area and are best dealt with by those affected.

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?

Yes – probably.

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?

NPR swathes should indicate actual noise impact from over-flights of nearby areas.

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?

Nothing further to add.

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

We would like to reiterate our position in relation to noise abatement for all activity at Gatwick including airspace management:

1. **No Second Runway:** Rejecting the second runway application by Gatwick Airport Ltd. on the grounds that it will cause too great an increase in noise, and therefore be too damaging to our environment, tranquillity and quality of life.
2. **Maximum Respite:** Advocating the introduction of a policy that offers maximum respite for all communities and individuals affected, and is based upon geography rather than size of population. It should include:
 - a. The provision of a **programme of planned rolling respite** for all blighted communities
 - b. The abandonment of the current policy, which unfairly targets rural areas, areas of tranquillity and areas of low-density population by concentrating flight paths over them.
3. **Maximum Safe Height:** Advocating the introduction of a regulatory discipline to control noise and disturbance. This should include:
 - minimum height restrictions for aircraft preparing to land.
 - significant and effective financial penalties for noise-related incidents, so that unnecessary noise from low flying aircraft is reduced to a minimum.
4. **Noise Measuring:** Advocating the adoption of noise measurement standards to replace noise averaging (as represented by the current use of the 57dB LAeq yardstick), so as to reflect better the actual impact of individual noise events. The assessment of impact would be based upon the latest technical opinion on Noise Disturbance and its correlation with health issues. This, along with the use of more meters, would make noise reduction targets more realistic.
5. **No Night Flights:** The cessation of all night flights between the hours of midnight and 6.00 a.m., in order to eliminate the most disturbing aircraft noise for the benefit of our communities.
6. **Aircraft modification:** Advocate a national policy within the United Kingdom whereby all the Airbus 318, 319 and 320 aircraft, and those with a similar airframe, which call at UK airports, are to be retrospectively fitted with a modification to reduce FOPP cavities and similar aircraft noise.

Noise monitoring, enforcement and consultation:

We are **in favour** of the following technical improvements to the consultation, implementation, monitoring and enforcement regimes:

1. We support a **revision of the terms of reference and management** of Airport Consultative Committees to make them independent, representative, transparent and effective.
2. We support **the establishment of an Independent Authority** to oversee the management and delivery of Noise Action Plans and Airport Master Plans, with effective powers of enforcement.
3. We support **greater public involvement** in all stages of selection of inbound and outbound flight routes as part of the changes arising from the London Airspace Consultation.
4. We support **more research into health management issues** with regard to aviation noise.
5. We support **research into the likely environmental impact** of the increase in aircraft flying below 7000 feet on our communities.
6. HWCAAG will forward all concerns, issues and aspirations to the elected constituency, ward and division representatives – Members of Parliament, and County and District/Borough Councillors – so that they are made aware of the feelings of their local communities, and are thus in a position to influence Central and Local Government policy makers on aviation matters.
7. HWCAAG will link with other local Parish, Town, District and Borough Councils to achieve a common voice which is **reasonable, consistent, measurable, factual and objective**.

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High Weald Councils Aviation Action Group

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