

# LEIGH PARISH COUNCIL

*Clerk to the Council*  
**Mrs Louise Kleinschmidt**

**2 Bothy Cottages  
Threshersfield  
Chiddingstone  
Kent. TN8 7NE  
Tel: 01892-871651  
Email: [louise.leighclerk@hotmail.com](mailto:louise.leighclerk@hotmail.com)  
[www.leighkent.org.uk](http://www.leighkent.org.uk)**

12<sup>th</sup> August, 2014

Gatwick Consultation  
Ipsos MORI  
Research Services House  
Elmgrove Road  
Harrow  
HA1 2QG

Dear Sirs

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

Leigh Parish Council wishes to highlight some general points.

Firstly, we are very concerned at the proposal to narrow the current swathe within which arrivals for RWY 26 are channelled. Narrowing the swathe will intensify the frequency of the over-flying nuisance to our community is subjected. As noticed on Sunday, 3<sup>rd</sup> August, the nuisance is appreciably reduced when aircraft are only one or two miles to the south or north of the village. Hence we believe the burden of overflight should be spread out as far as possible by using as many variations in the flight paths as feasible.

We believe that Gatwick Airport should encourage the use of larger quieter aircraft to minimise the need for an increase in the number of take offs and landings while generating increased capacity for passengers and freight. Airport charges should be geared to meet this objective.

Leigh Parish Council believes that the fundamental principle to be applied to any change is that there should be no increase in the populations overflown or the intensity of overflights.

### **Leigh Parish Council's 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.

*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?*

Leigh Parish Council supports 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 support is based on the 500m NPR indication that a negative population figure of - 3900 will be achieved against a 0 (zero) figure of those newly affected. This proposal is much better than the current system but does not address the question of respite which would be more preferable still.

*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

The level of noise and the frequency of occurrence need close attention. For example, a quieter noise at night can be much more intrusive than a louder noise by day.

*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?*

Leigh Parish Council believes that maximum respite should be offered to the overflown. In our view that can be achieved by multiple narrow NPRs to ensure maximum respite. This should result in many people being affected to a lesser extent but fewer to an intolerable extent. It should also be fundamental to any decision that there should be no increase in people being overflown or the intensity of those overflown.

*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. Further, Leigh Parish Council believes that, because of the large population living around Gatwick, Gatwick is not appropriate for night flights

*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?*

Leigh Parish Council strongly considers that the best form of respite is to have a zero quota between midnight and six am. Any change must have as its objective a reduction in sleep being disturbed

*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 should be that the fewest number should be affected. The requirement should be no increase in noise burden on 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. Further, please see our response to 3a and 3b above.

*Questions 4a, 4b, 4c are not relevant to the Leigh parish 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. If simply narrowing the NPRs leads to a higher concentration of noise for a minority of residents; GAL should not go ahead. If narrowing enables a greater number of respite routes being available and used, provided that there is no increase in noise pollution for anyone, this would be welcome.

*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?*

Leigh Parish Council considers that no-one should suffer excessive noise. And, subject to this, an overall reduction of noise pollution should be the principle aim.

*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 while minimising the effect on as many people as possible. Further, to take advantage of improvements in aircraft navigation systems, the narrow NPRs should be routed to minimise overflying centres of population even down to village or hamlet levels.

*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. Unless there is a reduction in noise pollution, there is little point in making this change.

*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. Consideration needs to be given to the extra noise and pollution generate by an increase in the engine power maybe needed for a sharp turn

*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 noise abatement in relation to 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. The effect of differing noise levels resulting from the distance from the airport should be factored in rather than just considering the size of populations.
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.
- 7.

#### **Noise monitoring, enforcement and consultation:**

Leigh Parish Council is in favour of the following technical improvements to the consultation, implementation, monitoring and enforcement regimes supporting:

1. a revision of the terms of reference and management of Airport Consultative Committees to make them independent, representative, transparent and effective.
2. 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. 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. more research into health management issues with regard to aviation noise.
5. research into the likely environmental impact of the increase in aircraft flying below 7000 feet on our communities.

Colin Stratton-Brown

Chairman

Leigh Parish Council

12<sup>th</sup> August 2014