## YOUR LONDON AIRPORT Gatwick

Manager Airspace Regulation Civil Aviation Authority CAA House 45-59 Kingsway London WC2B 6TE

25 September 2019

Dear

## Airspace Modernisation Design Principles – FASI-South Gatwick

Thank you for your letter dated 29 July 2019 in which you highlighted the need to align airport airspace change design principles with the strategic objectives of the Airspace Modernisation Strategy.

We are pleased that the CAA acknowledges that Gatwick has already made clear reference to the objectives of the Airspace Modernisation Programme and the importance of working together with NERL and other airports to collectively ensure that flights are 'Quicker, Quieter and Cleaner'.

Your quotes referenced the supporting text we included in our Statement of Need and how we summarised the importance of the programme in our second engagement document. We would also refer you to the three Statement of Need objectives that form the overarching requirement for our involvement on the FASI-South Programme. These objectives, in addition to promoting airspace efficiency and environmental benefits, also cited the need to 'Efficiently integrate with LAMP airspace design and make best use of enhanced network system capabilities'.

Our proposal, dated 12 June 2019, also reiterated the requirement for this airspace change to support the specific lower and terminal airspace change objectives, as set out in Airspace Modernisation Strategy. The proposal went on to demonstrate, in Section 4, the alignment between design principles and these objectives; these objectives were also used to shape how the design principles were prioritised.

We believe that we have already fully apprised 'our stakeholders' of the connection between Airspace Modernisation and our design principles and the way in which they will be applied.

We also believe that the design principle you are mandating is already covered by the airport's requirement to ensure that, as part of an airspace change proposal, we act and comply with CAP 1616 and obligations on the CAA as set out in Section 70 of the Transport Act 2000. These requirements are included in our methodology for developing and appraising concepts and options.

Accordingly we believe there is no need to develop an addition design principle and in the interest of not wishing to confuse and place further unnecessary burden on our stakeholders we are choosing not to write specifically to stakeholders to advise them of your request. However, we will be explaining your sentiment when we re-engage in October to explain the Stage 2 process and outline the method we will adopt to evaluate each option, which will include how the

objectives of the strategy will be included. This methodology recognises the high level of importance attributed to the adherence to Airspace Modernisation Strategy objectives.

We expect to share our evaluation methodology with the CAA in December as part of our submission at the end of Stage 2A. This will remain a live document and will be appropriately updated during stages 3 and 4.

To conclude, we have taken time to carefully consider your request, but in recognition that we have already completed the 'Define' Gateway and the extensive referencing we have already made to the Airspace Modernisation Strategy objectives, our view is that the requested course of action is inappropriate and unnecessary, and the adjustment of the design principles would have limited value. We therefore, will not be formally including the design principle you propose, but will ensure that the options assessment recognises the importance of the Airspace Modernisation Strategy and its objectives.

If you wish to meet to discuss the contents of this letter then please contact me directly.

Yours sincerely,



Gatwick Airport Ltd