

Letter Seeking CAA Response – Route 4 Stage 2

Introduction

On 28 February 2020 CAA published the outcome statement to GAL's Stage 2 Gateway submission, where it was concluded that:

- The Change Sponsor did not demonstrate to the CAA's satisfaction that a consistent approach was adopted in relation to stakeholder engagement.
- The Change Sponsor has failed to produce to the CAA's satisfaction, a design principle evaluation showing how its design options have responded to the design principles.
- In considering the comprehensive list of options and the baseline, the sponsor has failed to adequately produce a 'Do Nothing' option.

Whilst we are able to more readily address points 1 and 2 above the issue of the 'Do Nothing' option is more challenging to reconcile.

In the statement and subsequent debrief the CAA highlighted that traffic flying the Route 4 temporary RNAV1 Standard Instrument Departures (SID) cannot properly represent the baseline (Do Minimum) scenario for the purpose of options appraisals. As discussed at the Gateway meeting we believe this explanation contradicts the CAP 1616 guidance (paragraph B27) where a baseline is meant to '...largely reflect the current-day scenario...'.

The definition of a 'baseline' in CAP 1616 is not consistent, for example describing it in paragraph B27 as '...a current-day scenario...', which is then contradicted in paragraphs E21 and E22 wherein CAP 1616 allows for '...informed view of the future and the minimum changes required to address the issues identified..' and "...The baseline must be considered in relation to its context, which may be changing..."

We are unsure how to interpret the terms 'current' and 'today' in the context of the Route 4 ACP, given that the current-day scenario at the time of the Stage 2 Gateway in February 2020 has been deemed inappropriate, while CAP 1616 offers conflicting guidance.

An additional complexity, following the the Stage 2 Gateway, relates to the publication CAP 1912 in May 2020 which requires denotification of the 2016 Route 4 RNAV1 SIDs. This means that after the implementation of the CAP 1912 requirements, the tracks that can be used to reflect a baseline that local communities can recognise and relate to, will have been removed. You will understand that, as in all probability that airlines will fly the remaining Route 4 conventional SIDs using the unregulated 'coded overlays', the variations in the instrument flight procedure coding (not published by Gatwick in the UK Aeronautical Information Publication) mean that we are unclear what resulting tracks may be flown.

It has since been determined that the use of modelling to simulate likely baseline traffic is also not viable because this will not align with stakeholder observations of what currently happens and has been since 2013.

In summary, on reflection given the various descriptors applied, we are unsure how to progress this Airspace Change Proposal (ACP) without obtaining further clarification from CAA on the correct definition of 'baseline' that applies to this specific airspace change.

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We are seeking CAA guidance and clarification in two areas which we believe are essential if this project is to progress in a manner that will be timely and transparent for stakeholders, namely:

- Response to and (hopefully) ratification of GAL's proposed definitions of the 'baseline' for the purposes of this airspace change, described below;
- Clarification on any CAA decision for the project to progress independently beyond Stage 2, being mindful of the new guidance on restarting paused ACPs.

Issue 1 - Baseline

As mentioned in the introduction, the term 'baseline' is used in CAP 1616 in different contexts: it can represent the current situation (B27) as well as the projected situation at the point of implementation (E21/22).

For the purpose of determining flight paths and tracks over ground, GAL proposes to interpret the 'Do-Minimum' option to mean the state after implementation of the CAP 1912 requirements, with conventional SIDs LAM, FRANE and MIMFO servicing the traffic on Route 4.

Furthermore, for the purposes of environmental assessments we propose that we will need to extrapolate the 'Do-Minimum' situation to the time of implementation in terms of likely volumes of traffic utilising the route. This is especially relevant now, since COVID has significantly reduced the traffic volumes and the air traffic is not expected to reach 2019 levels for several years.

In summary, the 'Do-Minimum' option will consist of post CAP 1912 traffic routeings on Route 4 extrapolated to the expected traffic levels at the time of implementation. This will subsequently form the baseline for comparison against all other proposed options. Is this a correct interpretation of the CAP 1616 guidance in relation to this ACP?

We also expect that we need to reflect the 'current situation' - the 'Do-Nothing' option representing the situation between 2013 and February 2021, pre-CAP 1912 implementation. We expect we need to provide an assessment of this option against the 'Do-Minimum' as described above, as per CAP 1616 E21. The point of this being to help those engaged and consulted through this process to understand the differences between the different traffic scenarios. Are we correct in our interpretation?

In addition, GAL also seeks a CAA confirmation on the following points concerning how we will proceed with the Stage 2 of this ACP:

1. GAL plans to gather flight track data over a 3-month period after CAP 1912 is implemented (March - May 21) to determine the traffic routeing post CAP 1912 implementation. We will then project the traffic volume forward to the implementation date and produce a combined scenario which will form a 'Do-Minimum' baseline for comparative purposes. GAL will present the 3 months of flight track data as outlined above to ERCD to conduct all the required environmental assessments. We propose that 3 months of real flight data is sufficient for this work. Does the 3-month dataset, as described here, suffice to extrapolate the data and model noise contours and environmental assessments in accordance with the CAP 1616a requirements?
2. Is the data set described above sufficient for ERCD to extrapolate as necessary and model an "average summer day over the period from 16 June to 15 September inclusive, for traffic in the busiest 16 hours

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of the day, between 0700 and 2300 local time”, as stipulated in CAP 1616A; and the similar calculation for the night time period, and in both cases the situation 10 years post implementation?

Issue 2 – Progression beyond Stage 2


We understand the CAA guidance on restarting a ‘paused’ ACP is applicable to the Route 4 project, as indicated on the CAA website “Airspace modernisation update – October 2020”.

We do not believe Route 4 is a ‘paused’ ACP in this regard but welcome the CAA view and clarification.

3. We also seek clarification in relation to the original Route 4 Statement of Need for this ACP. We anticipate that no additional work is required despite the impact of the COVID pandemic. Is this correct or does CAA expect the Statement of Need to be updated?
4. Finally, would the lack of an Airspace Modernisation Masterplan constrain progress with the Route 4 ACP in any way?

Yours sincerely




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