

# Appendix 2-2

Consolidated Stakeholder Feedback DPv0-2

Local Authorities-Ref 48-71

## 48 GATCOM Outline Design Principles \_ May19 - 20190517

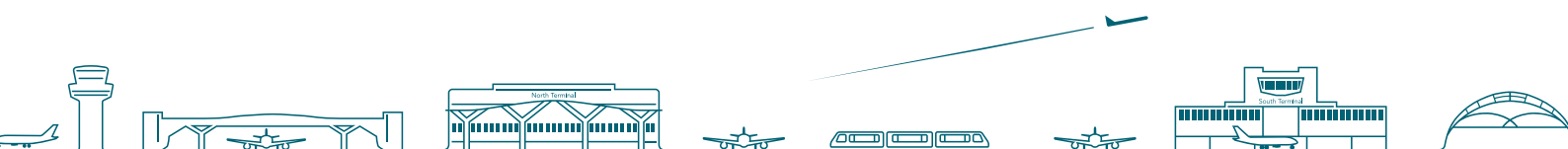
### **Airspace Modernisation - Gatwick Airport Outline Design Principles**

Thank you for giving us a further opportunity to comment on the development of design principles for the FASI-S project.

Given the timeframe within which to provide views as part of this second round of engagement, the comments set out in this letter have been agreed with the Chair and Vice-Chair of GATCOM, and GATCOM's Lead and Deputy Lead members for Noise.

I would first say that the points that GATCOM raised in its response to the first engagement document about:

- avoiding overflight of new areas not previously overflown, particularly at lower altitudes below 4000ft and that those significantly affected by noise, should be a high priority wherever possible.
- aircraft above 7,000 feet can still cause annoyance for some communities and this must be taken into account.
- the need to avoid overflight of densely populated areas and, as such we would oppose any change to the current overflight rules such as for Horley, Crawley and Horsham.
- The need for GAL to consider as part of the proposals development a compensation/mitigation package should proposed options come forward which will result in properties being newly overflown at a height below 7000ft.
- The need to seek a fair and equitable dispersion across the NPR swathe with continuous climb flight procedures to bring noise reduction benefits provided aircraft continue to follow the NPR trajectory. I would add that GATCOM has always advocated in response to DfT policy consultations the need for the current NPRs to remain in place so as to give certainty to planners and local residents as to where departing aircraft at lower levels should be flying over areas closest to the airport as this gives an indication as to where the greatest impact in terms of noise disturbance can be expected.
- Taking account of land use planning and areas of land earmarked for future housing development



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- Avoiding overflight of noise sensitive buildings such as hospitals, hospices and schools at lower altitudes and to preserve areas of tranquillity

remain key areas which GATCOM wish to see addressed and taken into account as part of the redesign of the airspace around Gatwick. It is appreciated that some of these points have been captured in some way as part of the revised design principles outlined in the second engagement document but GATCOM would nonetheless like to reiterate that the specific points outlined above must be addressed as work on developing design options commences.

GATCOM is also anxious to ensure that the final design principles will not result in any conflict with the NMB workplan actions or other noise reduction actions being progressed by GAL.

GATCOM's response to the questions posed in the second engagement document are as follows:

### **Q1. Should Gatwick include a principle that seeks to create an airspace design that aims to limit and where possible seek to reduce the adverse impacts of aircraft noise?**

Yes, the addition of a new core objective 'Limit adverse noise effects' is supported.

GATCOM is fully aware of the concerns of community noise groups about the need to ensure there is a balanced approach in the overall airspace design process which ensures that the negative impacts of aircraft noise and overflight are also considered. This new principle will therefore ensure that addressing noise impacts is also at the heart of airspace design. It is important however that the supporting text for this core design principle provides clarity on its aim. Firstly, it is suggested that the supported wording be revised to 'shall aim' rather than 'should'.

Secondly, as the FASI-S project is likely to be a once in a several generation change in airspace it is important for GAL to provide more clarity than is currently given in the document on the term 'adverse impacts of noise' and what is meant by 'limit'. For example, could reference be given to the need to avoid an increase in noise exposure, with the inner noise contours for Gatwick being given a higher priority? It is important to give recognition to the fact that not all noise is the same, someone overflown at 66dB suffers noise twice as loud as someone overflown at 56dB.

### **Q2. Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle?**

Yes, this must be the basis of all decision making to ensure a fair and balanced approach is given in airspace design.

### **Q3. Do you agree with the adjustments to the following design principles:**

**a. Safer by Design** - Yes

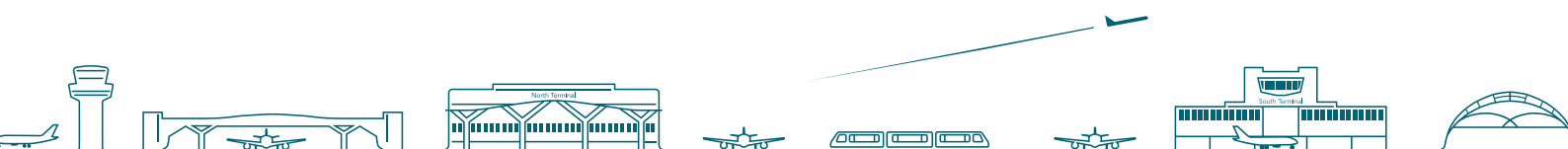
**b. Long-term Predictability & Adaptation** - Yes

**c. Optimise Use of Aircraft Capabilities** - Yes

**d. Deconfliction by Design** - Yes, but suggest that 'where possible' is included in the wording of the supporting text.

### **Q4. Should Gatwick adopt a principle to 'Build in Resilience' where practical?**

Yes, building in resilience to deal with disruptions is necessary as the consequences can result in further operational delays throughout the day for airlines and passengers and then late arrivals on the final turnaround which impacts negatively on communities.



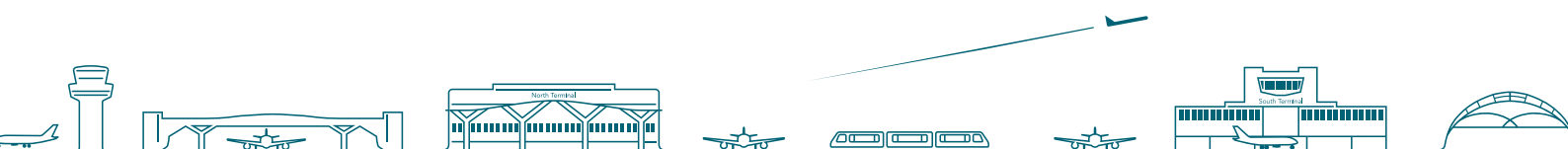
## 48 GATCOM Outline Design Principles \_ May19 - 20190517

### **Q5. Should Gatwick adopt a principle of 'Locally Tailored Designs'?**

Yes. Locally Tailored Designs are important as designing options/solutions for one route may not provide an appropriate solution for other routes particularly when taking into consideration the number and location of densely populated areas around Gatwick and the potential constraints created by flight path designs from other airports e.g Heathrow and/or other competing interests and objectives.

### **Q6. Do you believe any of the six non-core design principles warrant a higher relative priority?**

No. They are all of equal importance.



**50 Kent County Council Response to Gatwick Airspace Modernisation - Design Principle Development May 2019**

**1. Should Gatwick include a principle that seeks to create an airspace design that aims to limit and where possible seek to reduce the adverse impacts of aircraft noise?**

YES/NO

Additional Comments:

Kent County Council (KCC) strongly supports the inclusion of a design principle which seeks to limit adverse noise effects. Aviation noise may not be a statutory nuisance but that does not mean it does not cause substantial distress to local communities. Even with aircraft with the most enhanced capabilities, airspace design should also allow provision for multiple routes that offer respite for affected communities. GAL is therefore encouraged to create an airspace design that avoids where possible negative impacts for communities on the ground.

**2. Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle?**

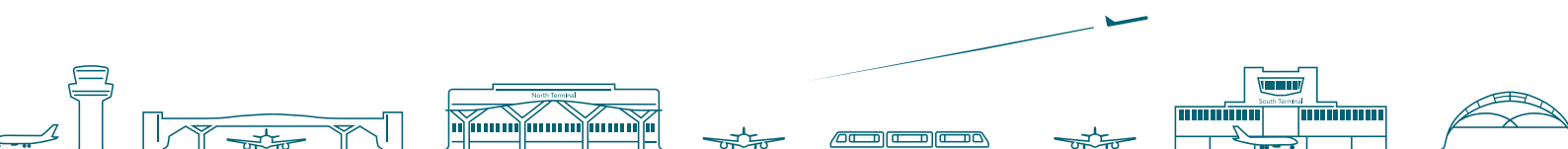
YES/NO

Additional Comments:

There is continually emerging evidence of the impacts of aviation noise that strongly demonstrates the real health costs felt by individuals. Ultimately these costs are picked up by the National Health Service (NHS) and by the wider economy in reduced productivity. The opportunity to modernise Gatwick's airspace by limiting adverse noise impacts as a core design principle could ultimately have a positive effect on improving local economic productivity and the health of local communities. We would also encourage Gatwick to fully consider the impact of night flights and design airspace in a way which attempts to lessen the noise impact at night – the most unacceptable kind of noise.

**3. Do you agree with the adjustments to the following design principles?**

- |  |               |
|--|---------------|
| a. Safer by Design                       | <u>YES/NO</u> |
| b. Long-term Predictability & Adaptation | <u>YES/NO</u> |
| c. Optimise Use of Aircraft Capabilities | <u>YES/NO</u> |
| d. Deconfliction by Design               | <u>YES/NO</u> |





## 50 Kent County Council Response to Gatwick Airspace Modernisation - Design Principle Development May 2019

Additional Comments:

### Safer by Design

*'Airspace design must at least maintain, and ideally enhance, aviation safety, by reducing or removing safety risk factors, provided enhancement does not have a disproportionately detrimental impact on other benefits'*

KCC remains in full support of the 'Safer by Design' design principle. We appreciate there is the risk other benefits may be diluted or lost at the expense of small safety improvement, including those benefits in relation to minimising and mitigating the environmental and community impacts of aircraft movements. However, Gatwick should where possible utilise alternative opportunities to strengthen the existing safety culture beyond current national and international regulatory standards.

### Long-term Predictability & Adaptation

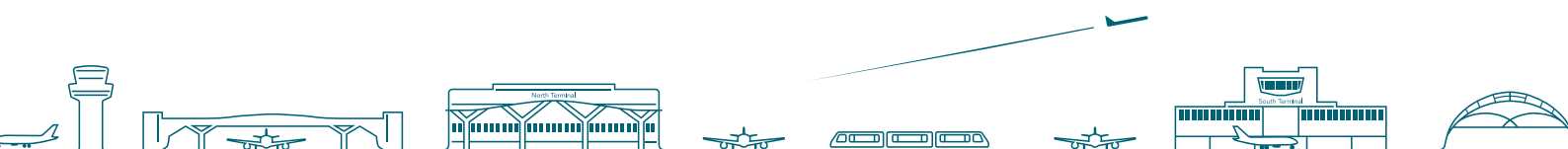
*'Airspace design should offer long term predictability of flight paths and respite and offer adaptation for the future airport development scenarios outlined in our draft Masterplan'*

Whilst KCC supports the inclusion of greater predictability of respite for local communities, we are concerned about Gatwick's draft Masterplan and the impact of additional aviation noise on our communities in west Kent. The proposal is for the emergency runway to be used for departures only, which on average are towards the west. However, this would release capacity on the main runway for arrivals and these predominantly affect the east of the airport. Noise forecasts produced show that in this scenario the noise environment around Gatwick would be broadly similar to today, i.e. the benefits of quieter aircraft would not be felt by the communities around the airport. This is not in keeping with the ethos of sustainable growth that is promoted in the draft Masterplan and draft design principles.

### Optimise Use of Aircraft Capabilities

*'The airspace design should enable aircraft operators to optimise the capabilities of their fleets to improve operational efficiency and environmental performance'*

KCC agrees with the adjustments made to the 'Optimise Use of Aircraft Capabilities' design principle, in particular the enhanced focus on improving environmental performance. However, future growth means that despite the benefits of aircraft operators optimising the capabilities of their fleet, an increase in future aviation movements caused by growth will lead to some communities still being negatively affected. The South East in particular is an area where the demand for more flights is being focused on a densely populated region. Therefore, Gatwick is encouraged to ensure airspace design makes provision for multiple routes that offer respite for those affected communities.



## 50 Kent County Council Response to Gatwick Airspace Modernisation - Design Principle Development May 2019

### Deconfliction by Design

*'The airspace design should seek to deconflict routes by design below 7000ft, and the prevalence of overflight of a community by flights on different routes and/or by neighbouring airport traffic, provided this does not significantly extend a departure route'*

West Kent remains significantly impacted by a continuous increase in overflight and subsequent noise exposure. A rise in the number of aircraft movements both at Gatwick and neighbouring airports such as Heathrow should not be allowed to negatively impact communities. Throughout the opportunity it has to modernise its airspace Gatwick should seek to deconflict routes by design below 7000ft, whilst still encouraging shorter flight tracks and continuous ascents/descents where possible to reduce levels of aviation noise. This should especially be the case at night as the new night noise regime will not reduce the movement allowance at Gatwick, and in fact, permits growth in the winter season.

The height at which aircraft fly along designated flight paths is also an issue for those overflown (as the lower the aircraft, the more noise). There is increasing evidence from complaints from residents that aircraft are flying lower than they should. There needs to be stricter enforcement of the heights aircraft fly, especially on approaches to Gatwick over west Kent, which experiences low flying aircraft on a regular occurrence.

#### **4. Should Gatwick adopt a principle to 'Build in Resilience' where practical?**

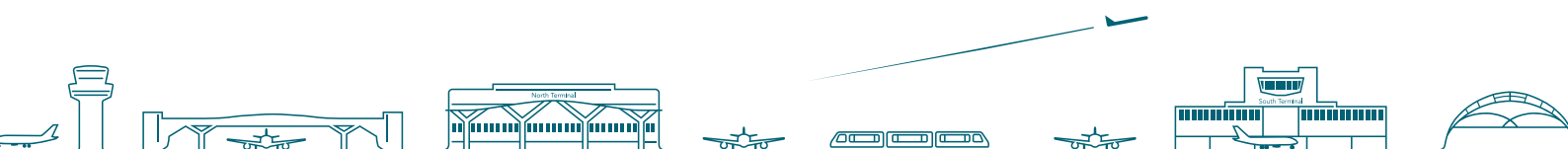
*Given the strong support for embedding resilience measures, where practical, into the airspace design we are proposing a principle that states:*

*'The airspace design should be materially unaffected by most disruptions, including poor weather and technical failures, through the provision of adequate contingencies'*

YES/NO

Additional Comments:

Airspace should be designed to ensure disruption does not negatively impact on local communities through an increase in overflight and usage of holds. Therefore, KCC would strongly support the adoption of a principle to build in resilience.



## 50 Kent County Council Response to Gatwick Airspace Modernisation - Design Principle Development May 2019

### 5. Should Gatwick adopt a principle of 'Locally Tailored Designs'?

*In light of the stakeholder feedback on multiple pathways, overflight management and the view on balancing the requirement to facilitate both operational efficiency and minimise local and global environmental impact, we propose a principle that states:*

*'Airspace design should enable decisions which affect how aircraft noise is best distributed to be informed by local circumstances and consideration of different options including multiple routes and the management of overflights (as per principle 3)'*

YES/NO

Additional Comments:

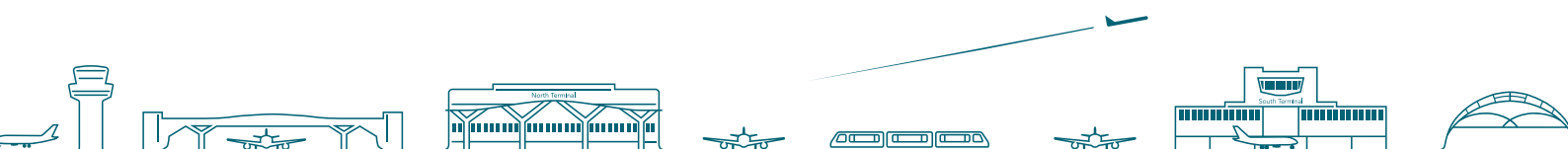
KCC is largely supportive of a principle which allows local authorities and communities the opportunity to influence decisions affecting the distribution of aircraft noise and management of overflights.

### 6. Do you believe any of the six non-core design principles warrant a higher relative priority?

YES/NO

Please explain why:

The six non-core design principles should not be a straightforward priority list, but rather should be addressed concurrently to ensure maximum benefit to local communities as soon as possible.





## 50 Kent County Council Response to Gatwick Airspace Modernisation - Design Principle Development May 2019

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YES/NO

Additional Comments:

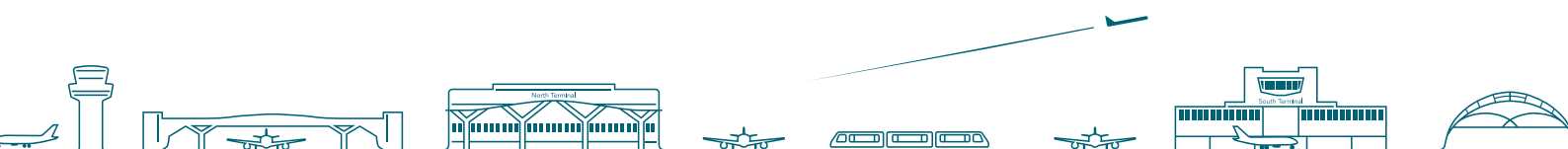
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51 Surrey CC Gatwick Airspace Modernisation Feedback Consultation response DP2 - 20190517

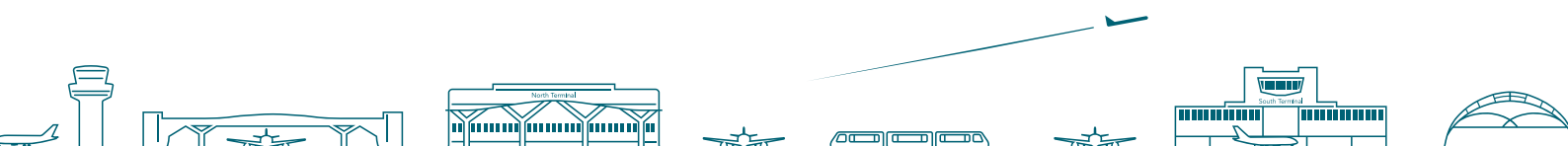
**Surrey County Council’s Response to the Airspace Modernisation Outline Design Principles at Gatwick Airport: Feedback Consultation April 2019**

Thank you for consulting Surrey County Council on the latest version of the design principles for airspace modernisation at Gatwick Airport. Our comments in response to the questions set out in the consultation document are included in Annex 1 attached to this letter and follow on from the response we submitted to GAL on 5<sup>th</sup> April 2019.

We recognise and welcome changes made to the airspace modernisation document that introduce a new core design principle to ‘Limit Adverse Noise Effects’ and focuses one of the three core design principles on noise, reflecting Surrey County Council’s primary concern relating to airspace change impacts. We also welcome Gatwick’s recognition of the importance of respite from noise, both as part of the new core principle and as mitigation for local communities who might experience greater concentration of flight paths.

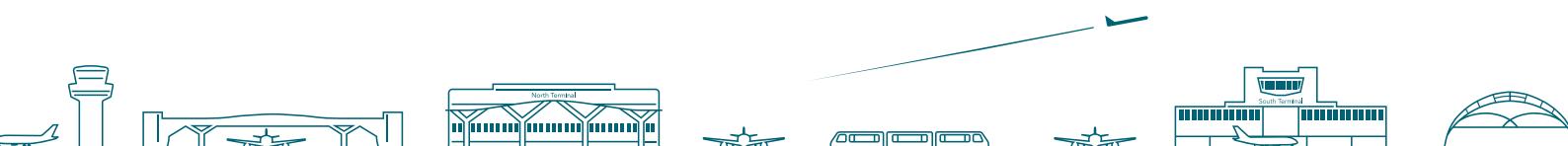
We must however reiterate that we would like to see the burden of aviation noise shared over as wide an area as possible to avoid unacceptable impacts of flightpath concentration. We would also reiterate that every effort must be made to ensure that all Surrey communities likely to be affected are kept informed of future consultations on airspace change proposals at Gatwick Airport and that residents are given the opportunity to attend events local to them to enable their full participation.

Question	Response
<p>1. Should Gatwick include a principle that seeks to create an airspace design that aims to limit and where possible seek to reduce the adverse impacts of aircraft noise?</p>	<p>Yes.</p> <p>We support the inclusion of this principle as it reflects a key County Council concern regarding the impact noise can have on the health and quality of life of our local communities.</p> <p>We anticipate that the new core principle will comprise mitigation measures including minimising the number of people newly overflown, managed dispersal and respite and using noise efficient operational practices. We expect the extent to which it is intended to ‘limit’ the adverse impacts of aircraft noise and the way that these impacts will be reduced ‘where possible’ will be made clearer as the design for the airspace change is finalised.</p>



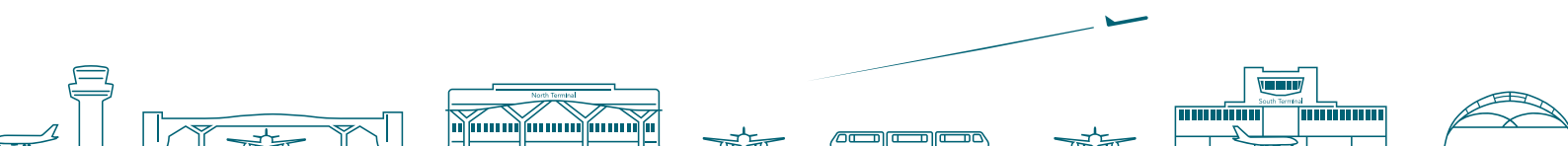
51 Surrey CC Gatwick Airspace Modernisation Feedback Consultation response DP2 - 20190517

<p>2. Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle?</p>	<p>We welcome the adoption of the design principle to limit adverse noise impacts as a core principle. This reflects the County Council's highest priority relating to airspace change impacts.</p> <p>We consider reductions in noise and respite to be key to mitigating existing and increased operations at Gatwick along with sharing routes over a wider area.</p>
<p>3. Do you agree with the adjustments to the following design principles:</p> <ul style="list-style-type: none"> <li>a. Safer by Design</li> <li>b. Long-term Predictability &amp; Adaptation</li> <li>c. Optimise Use of Aircraft Capabilities</li> <li>d. Deconfliction by Design</li> </ul>	<p>We recognise the improvements made in the adjustments to all four principles.</p> <ul style="list-style-type: none"> <li>a. Safer by Design – we welcome the addition of a balanced approach that takes into consideration the other design principles that need to be weighed against safety. Nevertheless the paramount importance of the safety of both travellers and residents is fully recognised. We would anticipate that safety considerations would extend the need to take account of the health impacts of noise and air pollution to those living and working in the vicinity of the airport.</li> <li>b. Long-term Predictability &amp; Adaptation We welcome the added reference to respite from noise and we accept that circumstances may arise that require adaptations. However, we would want to ensure that the allowance for flexibility would not lead to an increase in noise impacts on communities.</li> <li>c. Optimise Use of Aircraft Capabilities</li> </ul>



51 Surrey CC Gatwick Airspace Modernisation Feedback Consultation response DP2 - 20190517

	<p>Our primary concern is to minimize the noise impacts on our local residents and we would therefore welcome any operational efficiencies that lead to a reduction of noise impacts for local communities. The priority should be on improving environmental performance rather than operational efficiency. We would reiterate the importance of incentivising airlines to make investments that reduce noise impacts.</p> <p>d. Deconfliction by Design – we appreciate that designs should not result in unreasonably long departure routes and that the balance between the objectives of reducing the impacts on local communities and saving fuel will need to be considered and consulted on at a more detailed stage in the design process.</p>
<p>4. Should Gatwick adopt a principle to 'Build in Resilience' where practical?</p>	<p>Yes.</p> <p>We understand the need for Gatwick to design in a level of resilience to cope with unforeseen events, but we would be concerned if this were to be at the expense of local communities routinely experiencing more adverse noise effects.</p>
<p>5. Should Gatwick adopt a principle of 'Locally Tailored Designs'?</p>	<p>Yes.</p> <p>We welcome the potential of this principle in combination with the new core principle to reduce the impact of aviation noise for local communities whilst taking into account the unique aspects of those communities.</p> <p>However, further discussions will be required to determine what these unique uses comprise and how flight paths can be managed to avoid them.</p>
<p>6. Do you believe any of the six non-core design principles warrant a higher relative priority?</p>	<p>We would prioritise the principle of predictable and adaptable routes as it is critically important that residents and businesses have the opportunity to anticipate and plan around long-term predictable periods of respite.</p> <p>We also favour the new design principle that caters for locally tailored designs, ensuring that noise becomes a key determinant of different options including multiple routes and the management of overflights.</p>



## 52 West Sussex Airspace Modernisation - Gatwick - Design Principle Development - Part 2 - 20190517

Thank you for the opportunity to comment on the evolving design principles. The following is the officer-only response from West Sussex County Council.

**Q1.** Should Gatwick include a principle that seeks to create an airspace design that aims to limit and where possible seek to reduce the adverse impacts of aircraft noise?

Yes (in part) – it is agreed that there should be a principle that addresses noise. However, terms such as ‘adverse impacts’ and ‘limit’ are open to varying interpretations and they (and any other terms) should be clearly defined.

More importantly, it is considered that the current wording of the icon does not accurately reflect that, as with other principles, there are potentially competing interests and objectives with regard to noise. These include: minimising impacts on more noise sensitive buildings and areas (such as AONBs); reducing the overflight of currently affected communities; avoiding densely populated areas; minimising the overflight of new communities; and dispersing noise impacts more equitably.

Therefore, it is suggested that wording of the icon, the principle, and the supporting text should better reflect the need for a balanced approach to be taken to minimising and managing the adverse impacts of noise. For example, the icon could be amended to read ‘Minimise and Balance Noise Impacts’ and the principle could be amended as follows (or similar) - ‘The airspace design should seek to minimise adverse noise impacts and aim to achieve a balanced, fair and equitable distribution of aircraft noise’.

**Q2.** Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle?

Yes (in part) – the inclusion of a principle that addresses noise is agreed but see comments under Q1 re the aims and wording of the principle.

**Q3.** Do you agree with the adjustments to the following design principles:

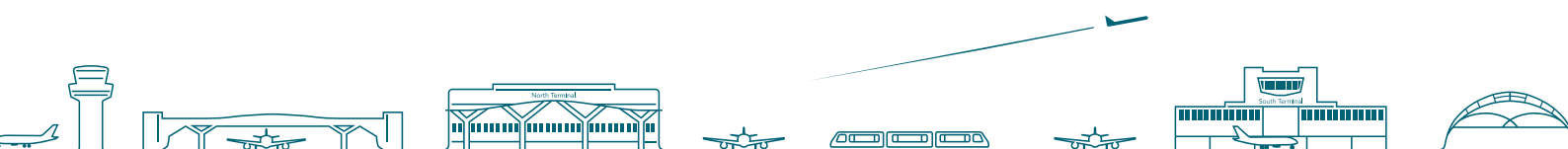
a. Safer by Design

Yes – it reflects the need for a balanced approach to be taken.

b. Long-term Predictability & Adaptation

Yes – it is agreed that long-term predictability is important because it provides certainty about noise impacts (and respite) and the need for mitigation.

c. Optimise Use of Aircraft Capabilities



## 52 West Sussex Airspace Modernisation - Gatwick - Design Principle Development - Part 2 - 20190517

Yes – the inclusion of the reference to environmental performance is important.

### d. Deconfliction by Design

Yes – although application of the principle will need to be balanced with others, particularly the 'noise' one.

### Q4. Should Gatwick adopt a principle to 'Build in Resilience' where practical?

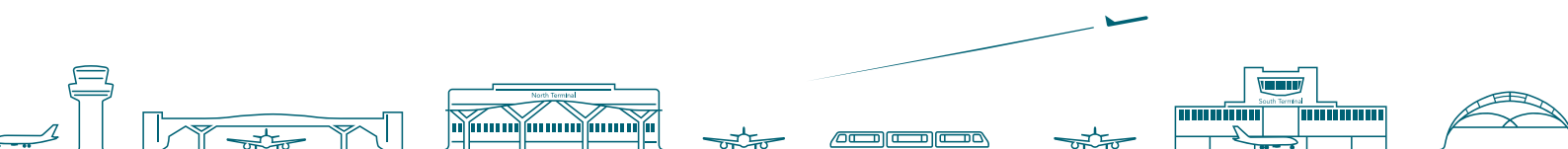
Yes – provided that the potential impacts of the 'adequate contingencies' are fully understood, including on local communities.

### Q5. Should Gatwick adopt a principle of 'Locally Tailored Designs'?

Yes – it is considered that the design must take account of local circumstances.

### Q6. Do you believe any of the six non-core design principles warrant a higher relative priority?

No – given that there are three separate core principles, there does not appear to be any benefit in then prioritising the remaining principles (which all have merit).



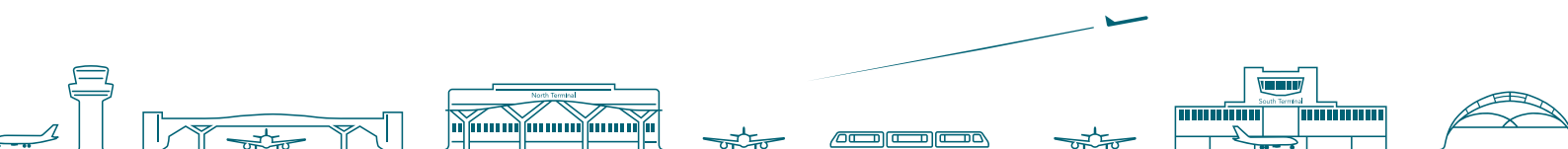


## 57 Lewes BC - Design Principle Development - Part 2 - 20190509

Thank you for your recent invitation to consult on Part 2 of Gatwick's design principles development.

Having reviewed the documents we do not plan to submit a response to your consultation, although we remain broadly in agreement with the principles being set.

I trust this is sufficient for your requirements, but please do let me know if you require any further clarification.



## 58 Guildford Airspace Modernisation - Gatwick - Design Principle Development - Part 2 - 20190517

Thank you for engaging with Guildford Borough Council in respect of the process of Design Principle Development for the Airspace Modernisation of Gatwick airport.

This is an officer-level response only in respect of the document 'Airspace Modernisation 'Gatwick Airport: Outline Design Principles' dated 26 April 2019.

We are responding with respect to the following questions:

**1.** Should Gatwick include a principle that seeks to create an airspace design that aims to limit and where possible seek to reduce the adverse impacts of aircraft noise?

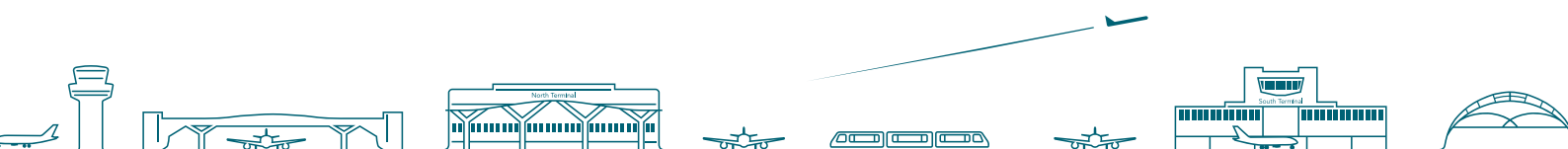
Response: Yes.

**2.** Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle?

Response: Yes.

We are not in a position to offer responses to the other questions.

We would like to put on record that we would not want any communities in Guildford borough to experience any noticeable increase in noise levels or changes in flight patterns from aircraft resulting from the Airspace Modernisation of Gatwick Airport. In the event that Gatwick Airport's proposals might adversely affect the borough in this manner, we would expect to be given the opportunity to review and respond to detailed quantification and assessment of the potential noise exposure impacts.



## 60 Horsham District Council's Consultation Response DP2 - 20190514

### *Introduction*

The Government and the Civil Aviation Authority (CAA) are co-sponsoring the Airspace Modernisation Programme and will be responsible for delivering 15 integrated initiatives by the end of 2024. The airspace above London and the South East is some of the busiest in the world and has not undergone significant change for over 50 years. Analysis undertaken by the Department for Transport on [Upgrading UK Airspace: Strategic Rationale](#) sets out that, without fundamental change to this airspace, there will be air traffic delays and increasing passenger disruption leading to both personal and commercial costs. Against this backdrop there are a range of drivers contributing to this requirement to deliver airspace modernisation, including passenger demand, existing design constraints, technological capabilities, operational requirements, carbon reduction ambitions and adoption of EU regulation changes.

Taking into account these drivers and the emergence of better integration of navigation systems and tools, there is an increasing requirement to create airspace design more appropriate to modern day air travel.

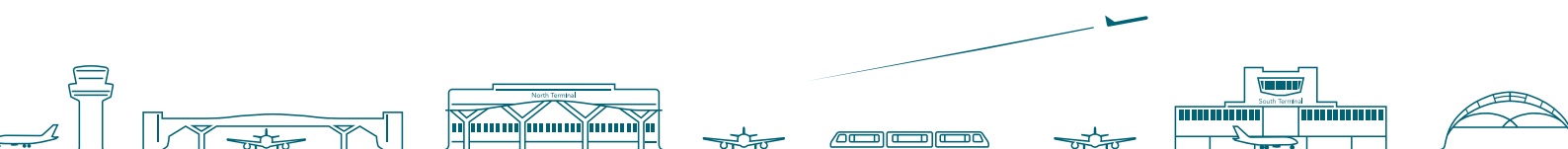
Gatwick Airport Limited (GAL) has therefore proposed a process of Design Principle Development and is consulting with key stakeholders over three phases. The first phase was the Introduction to Design Principles and GAL required feedback by 5<sup>th</sup> April 2019. Horsham District Council chose not to respond to this consultation, intending to submit comments in the next phase. The second phase which this response has been prepared for, concerns the Outline Design Principles. GAL released the feedback from the previous phase, together with the next set of questions on 27 April 2019 and requires feedback by 17 May 2019 in order to submit a proposal to the CAA by 13 June 2019.

The design principles are intended to support the evaluation of design options for airspace modernisation at Gatwick Airport.

### *Potential impact on local communities*

Thank you for providing the opportunity to submit our comments on the development of Design Principles for Gatwick as part of the FASI-S programme of airspace modernisation. We welcome the opportunity to respond on this important issue.

The Council acknowledges that this is an important and essential body of work to ensure that the design of airspace can take advantage of new technologies, meet increasing passenger demand and meet environmental objectives. New technology undoubtedly brings a range of benefits, but it is important to consider the requirement for airspace modernisation in the wider context of Gatwick's plans for growth, which are significant. Horsham District Council recently responded to the Draft Gatwick Airport Master Plan in which three scenarios for growth of the airport have been set out. At the time of writing, we understand that GAL is analysing over 5,000 responses to the consultation with the likely intention of progressing a Development Consent Order (DCO) application to operationalise the second growth scenario to bring into



## 60 Horsham District Council's Consultation Response DP2 - 20190514

routine operation the standby runway. Given the potential scale of growth anticipated by GAL it is understood that there will be a significant increase in the number of flights to accommodate this level of growth. Whilst it is acknowledged that there may be noise benefits for some people as a result of airspace redesign, and new technology plays an important role in delivering this, there will also be increased noise for others and the potential for people not currently overflown to be overflown in the future.

As we have highlighted in previous consultations, we agree with the general principle that less noise should be experienced by more people, however, given the relative tranquillity of the rural environment in large areas of Horsham District, change in the noise environment is also an important consideration and rural communities are likely to be significantly adversely impacted if they are newly overflown.

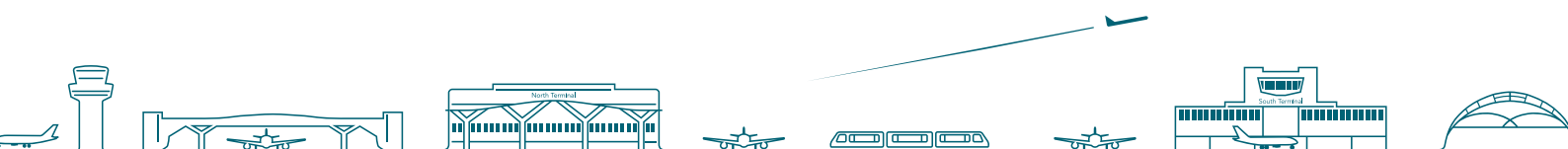
GAL must ensure transparency in providing accurate information about the possible impacts as a result of airspace modernisation. Communities should be able to fully understand the potential effect of these proposals. This includes benefiting from ensuring predictability for local communities on flight routes in the long term and robust and meaningful mitigation measures to minimise the impact on affected communities.

Newly overflown communities as a result of airspace modernisation should be minimised but for those that are affected, it is imperative that GAL puts in place a compensation package for those newly or increasingly affected. Although not a national policy requirement, funding for local communities and compensation packages represent good corporate social responsibility as recognised in the government's green paper, [Aviation 2050: The future of UK Aviation](#). According to the green paper, the government intends to create a stronger and clearer framework which incentivises industry to reduce noise or to put mitigation measures in place. Given the scale of GAL's plans for growth and the potential impact on local communities, the Council recommends that GAL does not wait for policy direction from the Government but proactively addresses this and puts in place a robust mitigation strategy.

### *New housing requirements*

The Government has committed to providing 300,000 per annum and has created a standard housing methodology to help local authorities calculate the local housing need for their administrative areas. Horsham District is an area with high housing need and worsening affordability ratios. The Council is required to plan for the delivery of sufficient housing to meet this need. The Council is currently conducting a local plan review and is considering a number of strategic scale sites. Undoubtedly, it will only be possible to meet some of this housing requirement by building on greenfield land.

Given the current stage of the local plan review and the large body of work that needs to be undertaken we are not able to confirm where these sites will be at the time of writing this response. What is important to note however, is that allocating new strategic scale sites could result in the creation of new communities under flight paths. We therefore urge GAL to continually engage with local authorities to understand new housing growth and to ensure that the delivery of new housing is taken into consideration when developing an airspace strategy.



## 60 Horsham District Council's Consultation Response DP2 - 20190514

### *Consultation feedback*

On a final note, the Council wishes to highlight that the timescales for consultation are considered insufficient. This series of consultations for the development of Design Principles is targeted at key stakeholders, which includes local authorities. Given the functions and organisation of district and borough councils it is very difficult to provide an effective and informed response in less than 3 weeks which this consultation has provided.

Please note therefore that the comments in this response are made without prejudice and are given as an officer-level response to the consultation.

### *Horsham District Council's response to the Feedback Question Summary*

1. Should Gatwick include a principle that seeks to create an airspace design that aims to limit and where possible seek to reduce the adverse impacts of aircraft noise?

***Yes, the Council considers that the design of airspace should limit, and where possible reduce, the adverse impacts of aircraft noise.***

2. Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle?

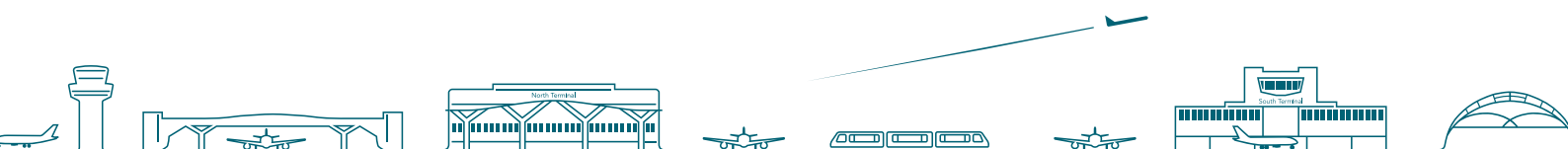
***Yes, this should form a core design principle.***

3. Do you agree with the adjustments to the following design principles:

- a. Safer by Design
- b. Long-term predictability & Adaptation
- c. Optimise Use of Aircraft Capabilities
- d. Deconfliction by Design

***Yes, we agree with the above design principles. However, we recommend that the number of people newly overflowed is minimised and this should form a core design principle. A significant adverse response to aircraft noise occurs when there is a change in the noise climate. This adverse response can manifest in a number of different ways including stress, anxiety, sleep disturbance and impact on children's learning and is evidenced by numerous studies including those undertaken by the CAA and Dr Charlotte Clark for the Airports Commission.***

***The Council considers long term predictability an important principle as this will enable GAL to put in place robust mitigation strategies that will seek to minimise the impact on affected communities. Mitigation should include respite options, noise insulation schemes and in the case of newly overflowed residents, financial measures to compensate for any negative impact on property values.***



60 Horsham District Council's Consultation Response DP2 - 20190514

4. Should Gatwick adopt a principle to 'Build in Resilience' where practical?

***Whilst we agree with the principle of optimising the aircraft technological advances, advances in precision based navigation has led to concentration of aircraft over some areas. It is acknowledged that other aircraft capabilities that have environmental benefits are welcomed but often take many years to infiltrate the entire fleet using the airport.***

***From reading the supporting documentation accompanying this consultation, it is considered that there is an implied conflict between operational efficiency versus environmental impact. Both considerations should be considered important and taken into account when seeking the agreement and development of design principles.***

***Whilst time-based operations may provide operational efficiency for the airport, it may not provide the optimum solution for the communities that are overflowed. Newly overflowed properties would not only be impacted by the range of health implications associated with noise disturbance, such as poorer sleep and increased anxiety but also a potential reduction in property values***

5. Should Gatwick adopt a principle of 'Locally Tailored Designs'?

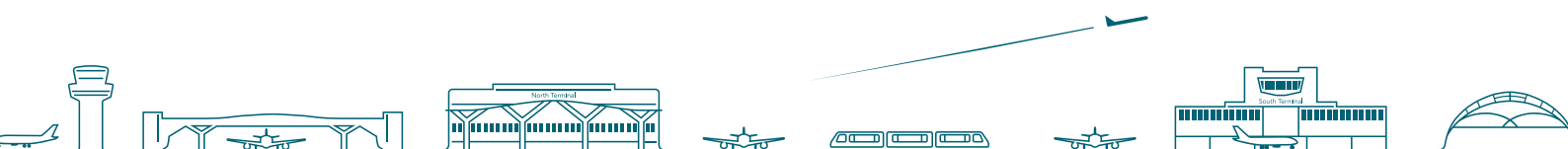
***Yes, we agree that Gatwick should develop a principle of 'Locally Tailored Designs'.***

6. Do you believe any of the six non-core design principles warrant a higher relative priority?

***We agree that safety should warrant the highest priority. We also agree that, second to this, limiting the adverse noise effects is an important priority, which we understand is being equated with the enhanced navigation standards design principle.***

***The others we believe warrant a higher relative priority are:***

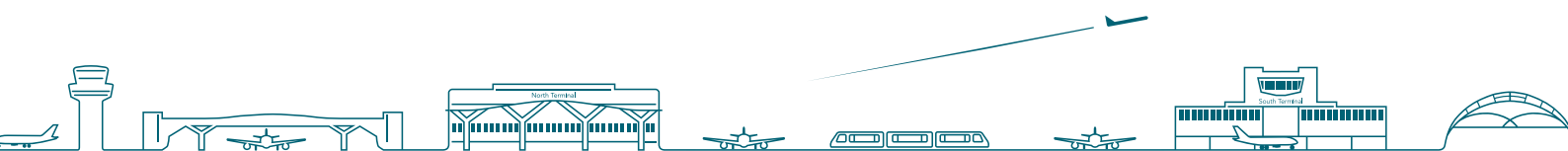
***Locally Tailored Design  
Deconfliction by Design  
Predictable and Adaptable Routes***





**61 Maidstone RE Airspace Modernisation - Gatwick - Feedback Reminder - Design Principle Development (Part 2) - 20190515**

Maidstone has decided not to respond at this time.



63 MVDC Response to GAL Outline Design Principles May 2019 - Final - 20190516

**Airspace Modernisation – Gatwick Airport: Outline Design Principles**

I am writing on behalf of Mole Valley District Council (MVDC) to respond to Gatwick Airport Limited (GAL)'s focused engagement with key stakeholders on outline design principles that forms part of the Future Airspace Strategy Implementation – South (FASI-S) process.

**Q1 – Should Gatwick include a principle that seeks to create an airspace design that aims to limit and where possible seek to reduce the adverse impacts of aircraft noise?**

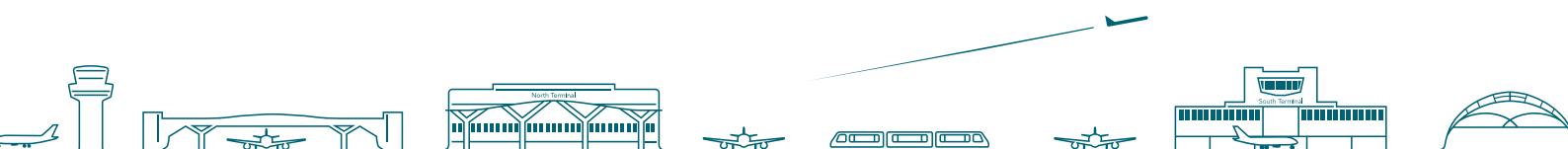
Yes. The airspace redesign process is an important opportunity to alleviate noise impacts on communities close to airports as well as noise sensitive areas such as Areas of Outstanding Natural Beauty. It is also important to ensure that no new communities are overflowed by aircraft, and that the frequency of overflight is reduced by the equitable and fair distribution of aircraft across the Noise Preferential Route (NPR) swathes.

**Q2 – Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle?**

Yes, this should be of the utmost priority when redesigning airspace.

**Q3 – Do you agree with the adjustments to the following design principle?**

- a. **Safer by Design** – Yes, safety should be a core principle however enhancement should not have a disproportionately detrimental impact on other benefits.
- b. **Long-term Predictability & Adaptation** – Long-term predictability should include adaptation to growth scenarios outlined in GAL's draft Master Plan. However, the inclusion of 'respite' within the design principle is not accepted. As with MVDC's previous response, we do not feel comfortable commenting on the provision of managed respite and the restriction of route availability at certain times owing to the lack of detailed information of each, and the lack of engagement at this early stage with Parish Councils that represent areas to be most affected by such a design principle.



63 MVDC Response to GAL Outline Design Principles May 2019 - Final - 20190516

- c. **Optimise Use of Aircraft Capabilities** – No, reference to ‘aircraft capabilities that benefit communities’ should not be removed from the design principle. It is important to recognise that aircraft operators optimising the capabilities of their fleets improves operational efficiency and environmental performance and this should therefore remain in the design principle, however there should also be a specific reference to benefitting communities as there was previously, else ‘environmental performance’ could relate to savings in fuel burn but not noise impacts on local residents.
- d. **Deconfliction by Design** – Yes, it is agreed that departure routes should not be significantly extended for deconfliction purposes. However, the emphasis of this design principle should be on the opportunity to reduce noise impacts on local communities as stated in our previous response.

**Q4 – Should Gatwick adopt a principle to ‘Build in Resilience’ where practical?**

Yes, a principle to ‘build in resilience’ is practical for times of disruption. This resilience should not be disproportionately at the expense of communities close to the airport, however.

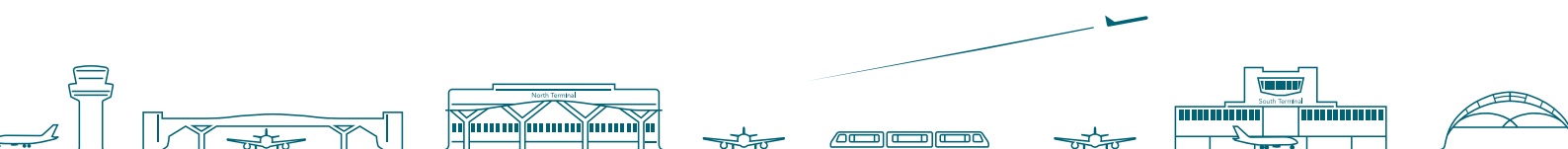
**Q5 – Should Gatwick adopt a principle of ‘Locally Tailored Designs’?**

Yes – locally tailored designs should be utilised to minimise local environmental impacts whilst also improving operational efficiency.

**Q6 – Do you believe any of the six non-core design principles warrant a higher relative priority?**

The six non-core design principles should each be considered on their merits. However, higher priority should be given to those that improve the noise climate for communities that are affected by aircraft overflight, with less consideration given to principles that worsen the noise impacts suffered by residents.

Please do not hesitate to contact me should you require any clarification on the points raised in this response. We look forward to further engagement and consultation in due course.



## 64 Reigate & Banstead Airspace Modernisation - Gatwick Airport Outline Design Principles - 20190517

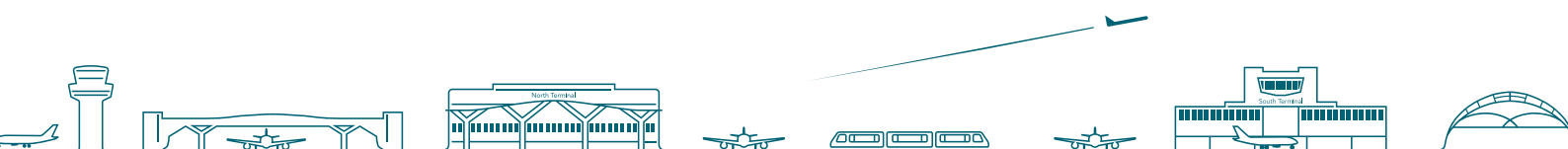
### Airspace Modernisation – Gatwick Airport: Outline Design Principles

Thank you for the opportunity to comment on Gatwick Airport's 'Airspace Modernisation: Outline Design Principles'.

I attach our answers to the questionnaire. I would just like to take the opportunity to highlight the following aspects of our response:

- We welcome inclusion of a core design principle about noise, however believe that this should go further. Airspace design should have community noise benefits at its heart as that there is no commercial incentive for airlines to address noise impacts (unlike, for example, emissions). For that reason we consider that the core noise principle should include that any changes should not increase, and should where possible reduce, noise disturbance to communities and residents; and minimise the number of newly overflown people, and the total population overflown. We also highlight in our questionnaire response the opportunity to better reflect the consideration of community benefits across the other proposed design principles.
- As highlighted in our previous response, we support Salfords & Sidlow Parish Council's position that, in relation to Route 4, future routes should reflect the pre-2012 'legacy' position towards the northern edge of the current NPR. We also support the position of Horley Town Council that the 'no overflying of Horley' principle should be retained, reflecting the urban character of this area and ongoing growth plans for the town. However, we are aware that some of our other communities may be impacted by airspace modernisation, and therefore would be very happy to provide information about what we consider to be the most sensitive locations across the borough, to factor into your options assessment work.

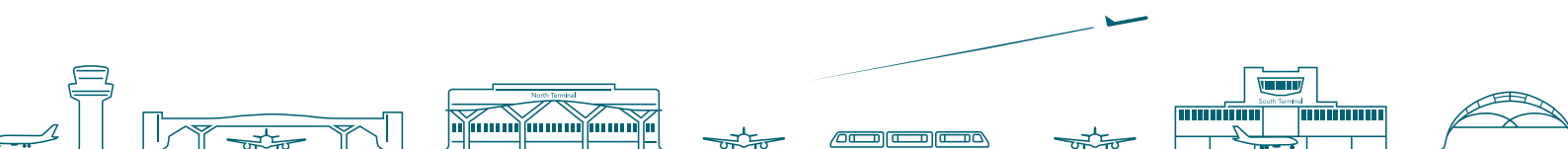
Notwithstanding the above and the attached response, we reserve our position in relation to future changes to Route 4 given that no information is currently available about the potential level of local impact. It is vital that - in reviewing its airspace - Gatwick provides sufficient information for local stakeholders and residents to understand the amount and level of disturbance that may be experienced, including compared to the 'baseline' situation.



## 64 Reigate & Banstead Airspace Modernisation - Gatwick Airport Outline Design Principles - 20190517

We would also reiterate our comments from the earlier engagement exercise that the short amount of time provided for us to comment has provided challenges, particularly due to the overlap with local elections. On this basis our comments are provided without prejudice to any future engagement or consultation responses from the Council. We request that future engagement and consultation is undertaken in a transparent and comprehensive manner that allows meaningful input from the wide range of local stakeholders. This will be even more important given the recent demise of the Noise Management Group.

I would be very happy to discuss our comments with you further should that be helpful.

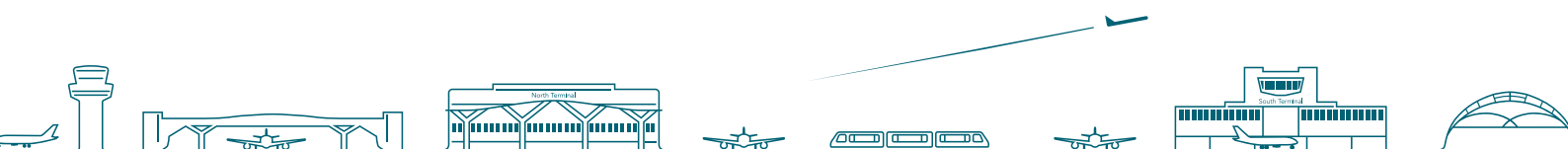


67 Tandridge DC response to part 2 engagement on design principles May19 - 20190517

As part two of our engagement on design principles we are asking for specific feedback on the following questions:

1	Should Gatwick include a principle that seeks to create an airspace design that aims to limit and where possible seek to reduce the adverse impacts of aircraft noise?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
	Additional comments: _____	
2	Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
	Additional comments: <u>IN RECOGNITION OF IMPORTANCE OF NOISE IMPACT TO LOCAL COMMUNITIES.</u>	
3	Do you agree with the adjustments to the following design principles: a. Safer by Design b. Long-term Predictability & Adaptation c. Optimise Use of Aircraft Capabilities d. Deconfliction by Design	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
	Additional comments: _____	

4	Should Gatwick adopt a principle to 'Build in Resilience' where practical?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
	Additional comments: _____	
5	Should Gatwick adopt a principle of 'Locally Tailored Designs'?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
	Additional comments: _____	
6	Do you believe any of the six non-core design principles warrant a higher relative priority?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
	Please explain why: <u>GIVING GREATER WEIGHT TO THOSE PRIORITIES WHICH REDUCE CO2 EMISSIONS/FUEL BURN WOULD RECOGNISE INCREASING EMPHASIS ON FACTORS CONTRIBUTING TO CLIMATE CHANGE</u>	





## 68 Tonbridge & Malling 190517 - Gatwick Airspace Modernisation

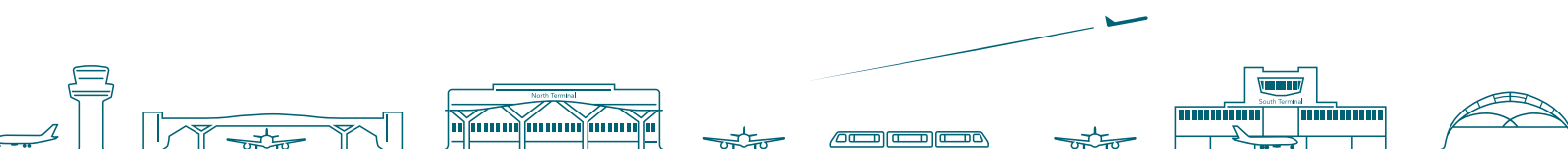
### Airspace Modernisation - Gatwick Airport Outline Design Principles

Thank you for the further opportunity to engage with Gatwick Airport, in developing the design principles that will shape changes linked to the modernisation of the airspace over the South East of England (FASI-South).

Tonbridge and Malling Borough Council remains concerned about impacts upon local communities that are overflown by aircraft below 7000ft. Any improvements that are implemented in due course, to ensure that communities in our borough are not overflown at low level would be welcomed.

Please find below our response to the questions that are set out in the airspace modernisation document (April 2019). Please note that this is an officer level response. Our members will be updated on this matter at the next meeting of our Planning and Transportation Advisory Board to be held in June.

We look forward to hearing further from you regarding this matter.



## 68 Tonbridge & Malling 190517 - Gatwick Airspace Modernisation

### Questions

1 - Should Gatwick include a principle that seeks to create an airspace design that aims to limit and where possible seek to reduce the adverse impacts of aircraft noise? **Yes**

Additional comments: TMBC would strongly supports this.

2 - Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle? **Yes**

Additional comments: TMBC strongly supports this, as noise impacts are the key issue for overflown communities in the west of Tonbridge and Malling borough.

3 - Do you agree with the adjustments to the following design principles?

- a. Safer by Design **Yes**
- b. Long-term Predictability & Adaptation **Yes**
- c. Optimise Use of Aircraft Capabilities **Yes**
- d. Deconfliction by Design **Yes**

Additional comments: TMBC has no further comment.

4 - Should Gatwick adopt a principle to 'Build in Resilience' where practical? **Yes**

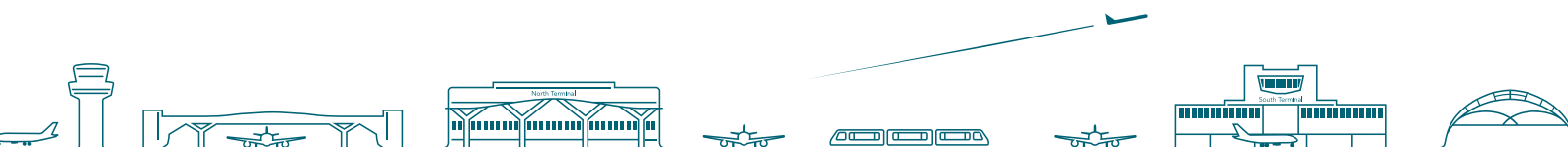
Additional comments: TMBC has no further comment.

5 - Should Gatwick adopt a principle of 'Locally Tailored Designs'? **Yes**

Additional comments: It is important that the way airspace is managed, is reflective of the impacts upon local communities.

6 - Do you believe any of the six non-core design principles warrant a higher relative priority? **Yes**

Please explain why: The six potential principles are all relevant, and play a part in hopefully designing of more efficient airspace that serves Gatwick airport. In terms of priority 'predictable and adaptable routes' and 'locally tailored designs' should have a higher relative priority, as these should help to support outcomes that mitigate noise impacts.



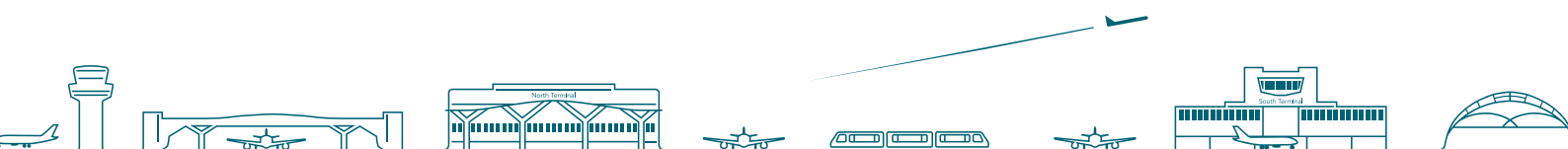
## 70 Waverley RE Airspace Modernisation - Gatwick - feedback - 20190514

Please find attached details of the feedback on your consultation from economic development team at Waverley Borough Council.

### Section 4 - Feedback Question Summary

As part two of our engagement on design principles we are asking for specific feedback on the following questions:

- 1 Should Gatwick include a principle that seeks to create an airspace design that aims to limit and where Y E S possible seek to reduce the adverse impacts of aircraft noise?
- 2 Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle? YES
- 3 Do you agree with the adjustments to the following design principles:
  - a. Safer by Design Y E S /
  - b. Long-term Predictability & Adaptation Y E S
  - c. Optimise Use of Aircraft Capabilities Y E S
  - d. Deconfliction by Design Y E S
4. Should Gatwick adopt a principle to 'Build in Resilience' where practical? YES
- 5 Should Gatwick adopt a principle of 'Locally Tailored Designs'? YES
- 6 Do you believe any of the six non-core design principles warrant a higher relative priority? Y E S
  - Locally tailored designs
  - Optimise aircraft capacities



## 71 Wealden Design Principle Feedback 170519

### Introduction

Gatwick Airport are consulting with stakeholders on the second part of their Airspace Modernisation Strategy, which relates to the design principles to be adopted through airspace design. The design principles form a qualitative framework that will be used to assess the suitability of airspace design options against a range of strategic outcomes. The airspace change process requires Gatwick Airport to consider all available options including the 'do nothing' and 'do minimum' scenarios. In order to assess the options that offer the most benefit and least impact, Gatwick Airport use a range of perspectives to assess detailed options.

In the last round of consultation there was full consensus that 'Safety by Design' should be adopted as a design principle and that this was the highest priority. Gatwick Airport have further developed its definition of its Core Design Principles to the following:

'Airspace design must at least maintain, and ideally enhance, aviation safety, by reducing or removing safety risk factors, provided enhancement does not have a disproportionately detrimental impact on other benefits'

There was strong support for the adoption of enhanced navigation standards, and a recognition that this could enable a number of positive impacts. The proposed design principle has remained as:

'Airspace design should adopt the most beneficial form of enhanced navigation standards for arrival and departure routes'

As a result of direct feedback from the last consultation stage Gatwick Airport are proposing a new Core Principle that seeks to reduce the adverse impacts of aircraft noise, as this was identified as an overarching theme from a number of consultation responses (Please refer to Question 1). This is an important element for Wealden District Council because of the environmental sensitivity of the High Weald Area of Outstanding Natural Beauty.

Further to these Core Design Principles, Gatwick Airport is seeking feedback from stakeholders on specific potential design principles before detailed proposals are brought forward. Gatwick Airport is looking to submit its Design Principle Proposals to the Civil Aviation Authority on the 13 June 2019 for review by the end of June 2019.

Wealden District Council's response to the current consultation questions on design principles are provided as follows:

### Further Specific Consultation Questions

1. Should Gatwick include a principle that seeks to create an airspace design that aims to limit and where possible seek to reduce the adverse impacts of aircraft noise?

YES / NO

Additional comments:

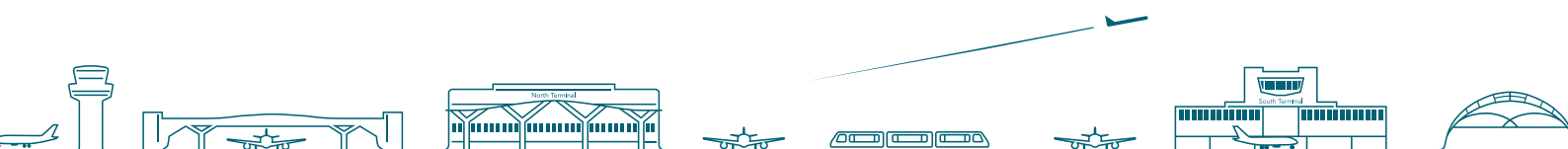
This is strongly supported. As highlighted in the consultation document this was fed back as a key area of concern at the previous consultation stage by a number of respondents, including Wealden District Council. The current wording of the design principle should be amended as follows: 'The airspace design should aim to limit and where possible seek to reduce the adverse impacts of aircraft noise' to be more proactive and committed to mitigating impacts of aircraft noise.

2. Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle?

YES / NO

Additional comments:

This core design principle should be adopted, subject to the suggested amendments outlined in Question 1.



## 71 Wealden Design Principle Feedback 170519

3. Do you agree with the adjustments to the following design principles:

- a. Safer by Design **YES** / NO
- b. Long-term Predictability & Adaptation **YES** / NO
- c. Optimise Use of Aircraft Capabilities **YES** / NO
- d. Deconfliction by Design **YES** / NO

Additional comments:

The adjustments to the design principles have been made in line with the consultation responses, which highlighted a high level of support for the design principles, subject to small amendments.

- Safer by Design – The Council support the amendment to highlight that the application of safety measures should not be at the expense of other benefits;
- Long Term predictability – The Council support the amendment to recognise that measures to manage the impact of aircraft noise on affected communities are addressed, in that route predictability should be linked to the respite predictability.
- Aircraft Capabilities – The Council support the amendment to the design principle to highlight that promotion of aircraft capabilities should primarily be used to mitigate the environmental impacts of aviation.
- Deconfliction by design - The Council support the amendment to recognise the potential adverse impacts of a significantly longer departure route, and an awareness of the proposed communities which are identified in Local authority Development Plans which will be affected.

4. Should Gatwick adopt a principle to 'Build in Resilience' where practical?

**YES** / NO

Additional comments

The Council support the addition of a design principle to build in resilience, especially in relation to the volatility of weather and climate, and the efficiency and effectiveness of technology. This will ensure that other impacts are kept to a minimum, for example, flight delays.

5. Should Gatwick adopt a principle of 'Locally Tailored Designs'?

**YES** / NO

Additional comments:

The Council support an approach which manages multiple pathways and overflight and seeks to balance operation efficiency and the local/global environmental impacts. This however appears to be a recurring theme in the design principles, as suggested in response to Question 6.

6. Do you believe any of the six non-core design principles warrant a higher relative priority?

**YES** / NO

Please explain why:

Apart from design principles relating to safety, the core design principles are of equal importance. However, there is a recurring theme coming through the previous consultation responses in relation to reducing the impact of aircraft noise and disturbance, and seeking to balance the environmental impacts with operational efficiency. As such it is relevant to link these to the overarching Core principles which should seek to balance the economic and environmental impacts of improved airspace design.

