

Appendix 2-4

Consolidated Stakeholder Feedback DPv0-2

Other Contributors – MPs, Parish Councils
& General Public

MP - 20190509 - Tom Tugendhat to Gatwick Airport, Airspace Modernisation

Thank you very much for taking the time to inform me, once again, of the second stage of the design principle development for the redesign of Gatwick's departure and arrival route procedures as part of the Airspace Modernisation programme.

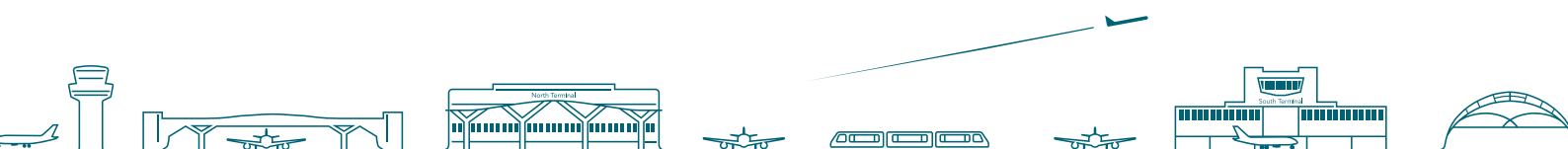
I thought it would be useful to share with you my thoughts on the six questions which have been proposed. My comment comes with regard to the first question, whether Gatwick should *"include a principle that seeks to create an airspace design that aims to limit and where possible seek to reduce the adverse impacts of aircraft noise"*.

I am very firm in the view that this is not the correct principle to include. The wording here is very similar to the national Aviation Police Framework 2013, which states that the Government's policy is to *"limit, and where possible, reduce the number of people in the UK significantly affected by aircraft noise."*

My specific concerns arise from the use of the term in Gatwick's definition 'seek to'. The government's policy is very clear in that noise should be limited and reduced when it can. Gatwick's draft principle only seeks to reduce the adverse impacts of aircraft noise. This will be of no comfort to communities who are blighted by aircraft noise. Consequently, I would ask that Gatwick Airport removes the words 'seek to' from its draft principle.

This change would allow Gatwick Airport to continue developing its outcomes in this important piece of work, but crucially also brings it closer in line with both government policy and the wishes of communities who notice their proximity to the airport. I trust this is a change which can be easily accommodated. Subject to this amendment, I would be able to agree that Gatwick could adopt the design principle to limit adverse noise as a core principle. It is essential that the affects of aircraft noise are at the centre of Gatwick's policy.

As ever, and in line with the comments I made in my letter of 26 March 2019, I have chosen to limit my thoughts to noise issues as these are the concerns which are raised with me most frequently.



MP - 20190517 - Greg Clark to Gatwick Airport, Airspace Modernisation

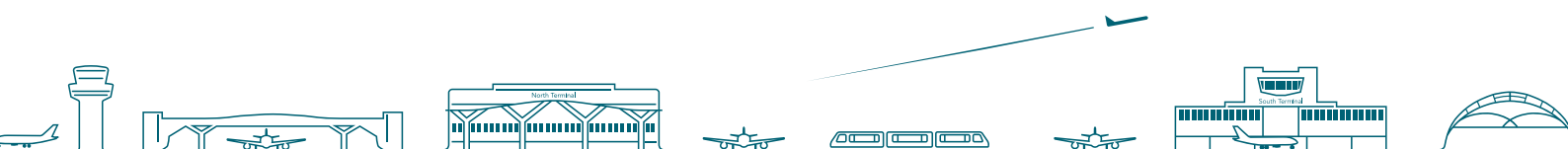
I write to you in my capacity as Member of Parliament for Tunbridge Wells, following the roundtable with the Aviation Minister on Wednesday regarding airspace modernisation and FASI-South.

Naturally, I appreciate that we are at a very early stage in a highly complex and technical process, and that further information and more detailed proposals will in time be put forward for consultation. However, I wanted to take the opportunity to offer my initial views on Gatwick's outline design principles, and follow-up on the wider discussion at the roundtable.

As you know from our previous correspondence and discussions, aircraft noise continues to be a major issue in Tunbridge Wells and the surrounding areas. Therefore, the inclusion of 'Limit Adverse Noise Effects' as one of the three core design principles is of course welcome. However, I do think the inclusion of "*seek to*" in the broader definition of "*aim to limit and where possible seek to reduce the adverse impacts of aircraft noise*", has the effect – whether intentional or otherwise – of appearing to weaken the strength of this commitment.

This is particularly important given the Government's overarching objective on noise, as set out in the Aviation Policy Framework 2013, is "*to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise*". Though the wording is similar, the inclusion of "*seek to*" in the design principles gives the impression of this being more of an aspiration than a key objective. I would therefore be grateful if this wording could be reconsidered.

In addition, I note that the noise reduction design principle includes a specific emphasis on reducing overflying – both in terms of numbers of people and frequency. Given this is also in line with Policy Framework's key objective on noise, I hope the FASI-South process proves an opportunity to consider the fact that Tunbridge Wells is the most populated area under the westerly arrivals swathe. I appreciate this will be more of a point to consider when proposing specific routes, but given my constituency experiences significant overflying in a manner affecting a large number of people, I felt it appropriate to reiterate it at this stage.

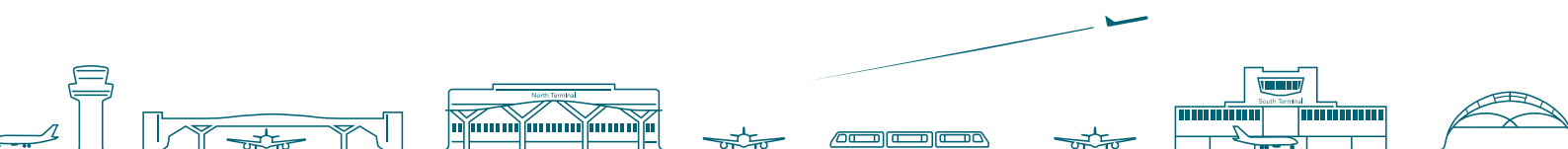


MP - 20190517 - Greg Clark to Gatwick Airport, Airspace Modernisation

Finally, with regard to the next stages in the process, it was clear at the roundtable that Gatwick, the CAA and the Department for Transport are extremely eager for this to be an open and transparent process. I would, therefore, be grateful for the following:

- Prior notification of the opening dates and duration periods of any consultation processes, with details of how I can direct and encourage my constituents to have their say.
- The opportunity of a briefing between stages 2 and 3 when, as I understand it, potential routes will first be made public. I would like to opportunity to inspect these, on a confidential basis, before they are put out for wider comment. As you will appreciate, as a Member of Parliament I will more than likely be the first port of call for peoples' first reactions to the proposals, and as such for me to have advanced sight of them would be mutually beneficial.

I look forward to continuing to engage with you regarding FASI-South and on Gatwick's plans for the future.



x1 Slinfold Parish Council - Feedback DP2 - 20190513

Additional comments from Slinfold Parish Council

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: Reducing noise for all communities in a balanced way taking into account all airspace factors, ambient noise measures and frequency of overflight has to be included as a core principle in any airspace design

This could be done by finding the 3 routes of least exposure to the whole of the population in a departure swathe. This can be done by:

1. Mapping population centres (e.g. > 500) within 25 miles of runway
2. Create zones (bubbles) of relative peace around these centres. Zone radius will vary according to typical altitude of planes at that population centre location.
3. Attempt to find at least 3 routes through avoiding zones (within swathe of population previously over flown during pre P-RNAV)
4. Approach could be computerised with the help of GIS software, customised to filter population centres and to allow experimentation of radius of zones.
5. Relative peace has been assumed to be 58dB dBLmax for the calculation of zone/bubble radii (could be less could be more)

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

YES / NO

Additional comments: Reducing noise for all communities in a balanced way taking into account all airspace factors, ambient noise measures and frequency of overflight has to be included as a core principle in any airspace design

It is noticeable that other environmental impacts are not explicitly stated or reflected in a design principle. This is concerning and disappointing especially in the light of recent events, those being: The Intergovernmental Panel on Climate Change report spelling out the dire consequences of exceeding 1.5C average global warming; Parliament's recognition of a state of climate and ecological emergency; and the CCC's advice that it is 'necessary' for the UK to reach net zero emissions by 2050

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

a. Safer by Design

YES / NO

b. Long-term Predictability & Adaptation

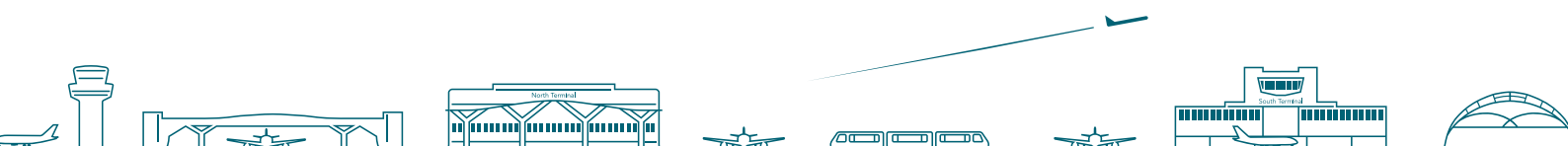
YES / NO (Has this changed?)

c. Optimise Use of Aircraft Capabilities

YES / NO

d. Deconfliction by Design

YES / NO



x1 Slinfold Parish Council - Feedback DP2 - 20190513

Additional comments:

As long as time based operations and de-conflict by design do not take priority over the core principle of minimising noise exposure to the SID swathe.

Within the Deconfliction by Design Principle the term 'Significantly' must be defined.

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

YES / NO

Additional comments : So long as Time Based Operations and De-conflict by Design do not take priority over the core principle of minimising noise exposure to the SID swathe .

Please explain what 'adequate contingencies' will mean practically

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

YES / NO

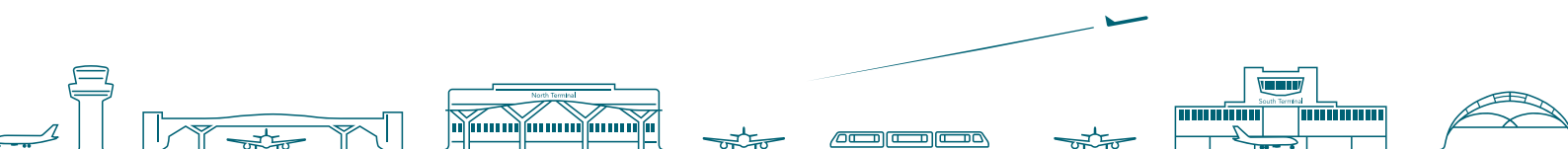
Additional comments : The statement ... " " how aircraft noise is best distributed " " should say to be quantitatively achieved minimum exposure to all population in a swath. This can be achieved by NATS by reducing noise for all communities in a balanced way taking into account all airspace factors, ambient noise measures and frequency of overflight

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

YES / NO

Please explain why: Tailoring Design Locally to fit circumstances should be highest priority of the six, then:

- Time Based Arrivals
- Deconfliction by Design
- Predictable & Adaptable Routes
- Optimise Use of Aircraft Capabilities
- Resilience Built in



x3 Salford&Sidlow - LGW airspace consultation SSPC final - 20190517

Re: Airspace Modernisation - Gatwick Airport - Outline Design Principles – Part 2

I am writing to you on behalf of Salfords and Sidlow Parish Council.

Salfords & Sidlow Parish Council is the third tier of local government which is equivalent to a Town Council. Being under two of the busiest departure route swathes (Routes 3 and 4) we represent communities that will undoubtedly feel the impact of any subsequent re-design on airspace. As highlighted in our previous response, we are commenting on this consultation because the final result will impact on our communities so we must be given the opportunity to contribute to the over-arching strategy. As such, Salfords & Sidlow Parish Council believe it is imperative that we contribute now and submits the following response.

Salfords & Sidlow Parish Council is in East Surrey; Salfords is located between Redhill & Horley along the line of the A23 whilst Sidlow is a rural area to the south west of Salfords with the A217 running through it. We serve 1400 households and an electorate of 2658 all living within a few miles of Gatwick airport.

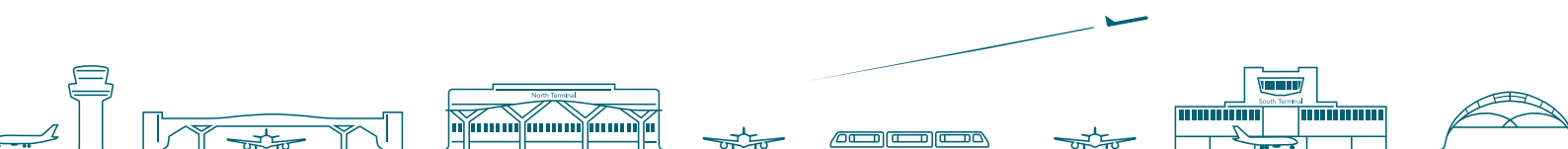
This consultation says it concerns *'the evaluation of design options for airspace modernisation at Gatwick Airport'*. The following comments are made on that basis. The questions deal with very general concepts of airspace modernisation which inevitably lead to generalised responses. Salfords & Sidlow Parish Council have already made specific comments on Route 4 elsewhere.

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.

Residents have been given repeated assurances that the increase in air traffic (which Gatwick does predict) will be more than offset by the improvements in aircraft technology leading to quieter, more fuel efficient and less polluting aircraft and that is what should happen.

It is not just a simple matter of seeking to reduce the adverse impacts of aircraft noise, and reducing adverse impacts of aircraft noise on those already affected, it is also a matter of not inflicting noise on people who were not previously adversely affected.



x3 Salford&Sidlow - LGW airspace consultation SSPC final - 20190517

- Safer by Design - NO
- Long-term Predictability & Adaptation - NO
- Optimise Use of Aircraft Capabilities - NO
- De-confliction by Design - NO

All of these should be incorporated within the design without the need to make any adjustments to the routes. They may change the numbers of aircraft on each route at any particular time but overall the improvements which these advances offer should lead to a reduction in overflights and corresponding reductions in both noise and pollution.

Long-term predictability & adaptation, optimised use of aircraft capabilities, time based operations and de-confliction by design should all lead to a reduction in stacking, more direct routes and consequent environmental benefits, they should reduce adverse effects and avoid the need for newly overflown people.

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

YES

Build in resilience should lead to long term predictability and reassurance for people on the ground. This would provide clarity about which areas are and are not adversely affected by noise and pollution.

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

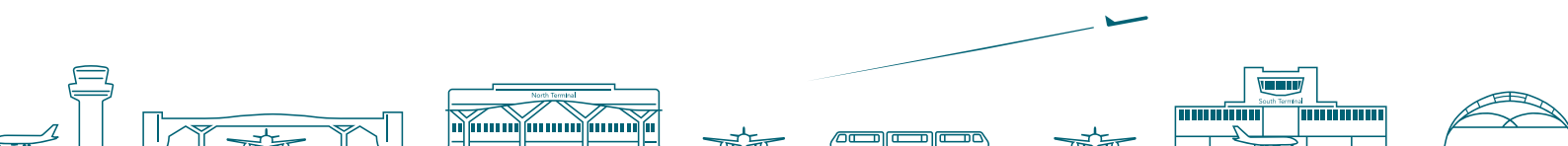
Yes

Locally tailored designs must recognise the existing routes.

Q6. Do you believe any of these six non-core design principles warrants a higher relative priority.

The priority must be to use the means available to reduce the adverse effects of aviation at Gatwick Airport, not to reduce the noise for some by inflicting it over a wider population.

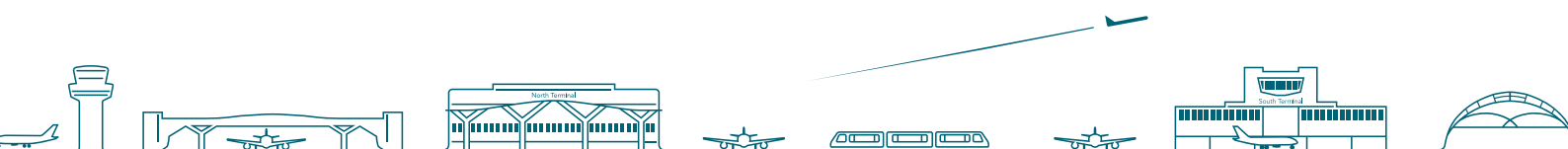
Section 1.3 includes the puzzling statement '*Whilst the Government analysis indicates that passenger demand is expected to steadily increase this does not automatically translate into additional aircraft movements*'. Gatwick Airport's Draft Master Plan 2018 targets more passengers and more aircraft movements. In section 2.4 Airlines are saying '*. . . there should be no constraints to efforts to . . . maximise capacity . . .*' Growth in both passengers numbers and aircraft movements seems inevitable unless there is Government action to prevent. It is incumbent on those who cause the problems that arise to do everything they can to mitigate them.



x7 Horley Town Council - Airspace Modernisation - Gatwick - Outline Design Principles - part 2 response

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

1	<p>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>Additional comments: Somewhat of a conflict in that there is a requirement to impact the least number of people yet government policy is to reduce the impact on areas such as an AONB which may be less densely populated. No easy solution in the increasingly densely populated south east of England. The question of respite or concentration can be an emotive subject dependent upon where a person lives and to which there is no solution that will satisfy everyone.</p>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
2	<p>Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle?</p> <p>Additional comments: _____</p>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
3	<p>Do you agree with the adjustments to the following design principles:</p> <p>a. Safer by Design b. Long-term Predictability & Adaptation c. Optimise Use of Aircraft Capabilities d. Deconfliction by Design</p> <p>Additional comments: We support the proposed small change with reference to Deconfliction by Design but add 'where possible' after the words airspace design.</p>	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"/>
4	<p>Should Gatwick adopt a principle to 'Build in Resilience' where practical?</p> <p>Additional comments: _____</p>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
5	<p>Should Gatwick adopt a principle of 'Locally Tailored Designs'?</p> <p>Additional comments: We support this proposal; the best solution for one route e.g. 3 or 4 may not be appropriate for others when taking into consideration the number and location of densely populated areas and possible constraints created by flights from other airports. We would oppose any changes to the current rules regarding the overflight of Horley.</p>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
6	<p>Do you believe any of the six non-core design principles warrant a higher relative priority?</p> <p>Please explain why: _____</p> <p>_____</p> <p>_____</p>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>



z3 Public - FASI design input DP0-2 - 20190515

Qu 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. 200% yes. This should be done by finding the 3 routes of least exposure to the whole of the population in a departure swathe. This can be done by:

1. Map population centres (eg > > 500) within 25 miles of runway
2. Create zones (bubbles) of relative peace around these centres. Zone radius will vary according to typical altitude of planes at that population centre location.
3. Attempt to find at least 3 routes through avoiding zones (within swathe of population previously flown over during pre P-RNAV)
4. Approach could be computerised with the help of GIS software, customised to filter population centres and to allow experimentation of radius of zones.
5. Relative peace has been assumed to be 58dB dBLmax for the calculation of zone/bubble radii (could be less could be more)

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

Yes. 200% yes.

Qu 3 Do you agree with the adjustments to the following design principle?

- Safer by Design
- Long-term Predictability & Adaptation
- Optimise Use of Aircraft Capabilities
- Deconfliction by Design

Yes. As long as time based operations and de-conflict by design does not take priority over the core principle of minimising noise exposure to the SID swathe.

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

Yes - As long as time based operations and de-conflict by design does not take priority over the core principle of minimising noise exposure to the SID swathe.

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

Yes. However the statement ... " " how aircraft noise is best distributed " " should say to quantitatively achieved minimum exposure to all population in a swath. This can be done by NATS using the bubble analysis as outlined in q1 answer.

Qu 6 Please provide your feedback on whether you believe any of these six design principles warrants a higher relative priority.

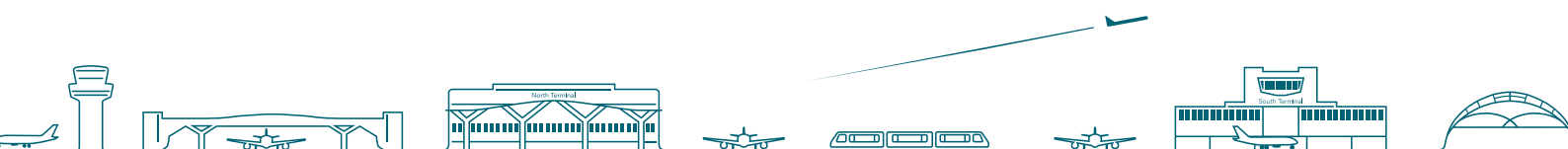
Tailoring design locally to fit circumstances should be highest priority of the six, then time based arrivals

Deconfliction by Design

Predictable & Adaptable Routes

Optimise Use of Aircraft Capabilities

Resilience Built in



z5 Public - Response to DPv0-2 - 20190427

1	<p>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"/></p> <p>Additional comments: <u>IN PARTICULAR WHERE CONCENTRATED ROUTES HAVE RECENTLY BEEN INTRODUCED (SUCH AS ROUTE 4) AND RESIDENTS UNDER SUCH ROUTES ARE NOW EXPERIENCING A VAST INCREASE IN TRAFFIC OVERHEAD, THIS SHOULD BE REVERTED TO THE PREVIOUS "SPREAD OUT" TRAFFIC CONCEPT.</u></p>
2	<p>Should Gatwick adopt the design principle to limit adverse noise impacts as a core principle? YES <input checked="" type="checkbox"/> / NO <input type="checkbox"/></p> <p>Additional comments: _____</p>
3	<p>Do you agree with the adjustments to the following design principles: YES <input checked="" type="checkbox"/> / NO <input type="checkbox"/></p> <p>a. Safer by Design YES <input checked="" type="checkbox"/> / NO <input type="checkbox"/></p> <p>b. Long-term Predictability & Adaptation YES <input type="checkbox"/> / NO <input checked="" type="checkbox"/></p> <p>c. Optimise Use of Aircraft Capabilities YES <input checked="" type="checkbox"/> / NO <input type="checkbox"/></p> <p>d. Deconfliction by Design YES <input checked="" type="checkbox"/> / NO <input type="checkbox"/></p> <p>Additional comments: _____</p>

4 Should Gatwick adopt a principle to 'Build in Resilience' where practical? YES / NO

Additional comments: _____

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

Additional comments: _____

6 Do you believe any of the six non-core design principles warrant a higher relative priority? YES / NO

Please explain why: LOCALLY TAILORED DESIGNS SHOULD BE PRIORITISED. THIS CONCEPT ESPECIALLY APPLIES WHERE PREVIOUSLY THERE WAS A VERY WIDE BAND (SEVERAL KILOMETERS) WHERE TRAFFIC FLEW, BUT NOW THIS IS A CONCENTRATED/NARROW BAND DESTROYING THE PEACE CONTINUOUSLY OF RESIDENTS UNDERNEATH IT.

