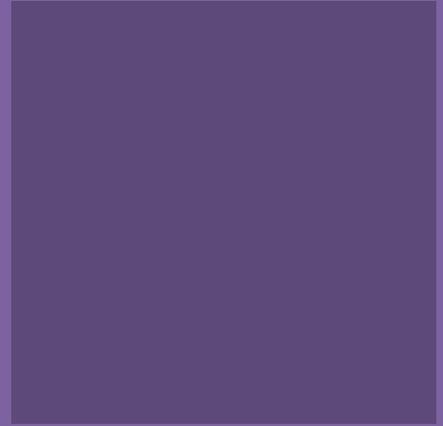
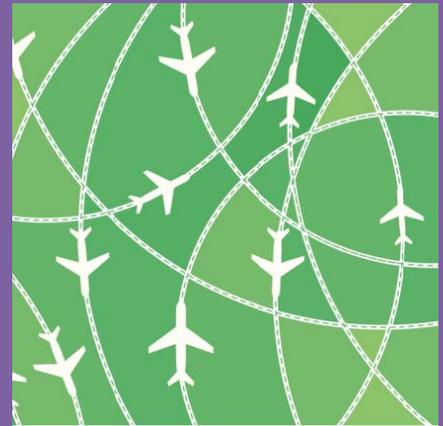


December 2014

London Airspace Change Gatwick Local Area Consultation

Final Report



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Overview of the Consultation

1 Overview of the Consultation

1.1 Background

This report relates to the “London Airspace Change - Gatwick Local Area Consultation” run by Gatwick Airport Ltd (GAL) between May and August 2014.

This consultation was the second part of a phased consultation strategy. The first phase was a broad consultation that GAL ran with NATS (the UK Air Traffic Control Provider) between October 2013 and January 2014; this was referred to as the London Airspace Consultation (LAC). That consultation aimed to uncover local requirements from a broad range of options to take into account in the on-going airspace design process.

The second phase of consultation covered some specific details relating to specific low altitude options developed on the basis of the feedback to the LAC; as it covered low altitude options only it was run by GAL alone.

In particular this low altitude consultation covered:

- a. noise contours and footprints
- b. population counts for the Noise Preferential Routes (NPRs)
- c. respite options and their effect on a and b (above)
- d. geographical areas not captured in the initial consultation
- e. potential adaptations of the Department for Transport (DfT) noise abatement requirements.

From herein references to “the Consultation” refers to the second phase of consultation that is the focus of this report.

The Consultation was owned and managed by GAL with Ipsos MORI contracted to analyse responses, and to prepare an independent report of the consultation findings. The consultation process followed the requirements documented in the Civil Aviation Authority’s (CAA) guidance on airspace change (CAP725) and was agreed with the CAA prior to launch.

The general public and stakeholder organisations were invited to participate in the Consultation. The consultation document and associated maps were designed to be as transparent as possible for a non-specialist audience, whilst still providing the detailed information about the proposals that CAA and DfT processes require.

This report was compiled by Ipsos MORI to provide an independent and objective analysis of the consultation’s responses. Ipsos MORI applied an impartial approach to the capture of the consultation responses, analysis, and reporting of the findings. The report excludes interpretation and opinion, instead reporting back the views and statements as received from individual members of the public and from stakeholder organisations that chose to part in the consultation.

The Consultation Process

2 The Consultation Process

2.1 Taking part in the consultation

The Consultation was launched on 23 May 2014. The purpose of the consultation was to give both individuals and organisations the opportunity to put forward their views and comments about the proposals for changes to airspace in the vicinity of Gatwick Airport.

A 60-page consultation document, providing details of the proposals, was made available on Gatwick Airport Ltd's website. A website and helpline were maintained by GAL throughout the consultation period. The website included a link to the online response form, as well as to the consultation document and associated maps. The website was: <http://www.gatwickairport.com/gatwickairspaceconsultation>.

There were a number of formal channels through which individuals and organisations could make known their views on the proposal options:

- Via the online **response platform** which could be accessed through the GAL website.
- Via a **written letter**. A freepost address was provided in the consultation document and the summary consultation document in order for individuals and organisations to post their response.
- By **email** via a dedicated address (gatwickairspacechanges@ipsos.com)

Responses sent directly to GAL during the consultation period were forwarded to Ipsos MORI for inclusion in the consultation analysis.

2.2 The response form and consultation questions

The online response form consisted of a series of questions relating to the different aspects of the proposed changes.

The consultation questions were divided into sections as follows:

- Questions about the proposed changes for **departures from Gatwick Airport**
- Questions about the proposed changes for **arrivals into Gatwick Airport**
- Questions about the proposed **realignment and reduction of existing NPR swathes**
- Additional comments

Overall, there were nine questions about the proposals. Each question cross-referenced the relevant section of the consultation document. Please refer to Appendix A for the questions that were asked as part of the consultation.

2.3 The timing of the consultation

The consultation ran from 23 May to 15 August 2014.

The consultation was originally due to close at 11.59pm on 14 August, but due to a minor technical outage of the online consultation system in the early hours of 14 August, the consultation was extended for an additional 24 hours, until 11.59pm on 15 August 2014. All responses dated and received within the consultation dates were treated as valid responses. In addition, to make allowance for any potential delays within the post or misdirection of emails and letters, these were accepted up until 5:00pm on Wednesday, 20 August. Responses forwarded from GAL were accepted as long as they had been originally submitted by the respondent before the consultation deadline and were received at Ipsos MORI by an agreed deadline.

The subsequent consultation extension was incorrectly reported by some media sources. Some websites stated that the consultation was being extended until midnight on 16 August – one day later than the actual extension. A small number of responses were received by email on Saturday 16 August. While these responses were technically too late to be included in the main analysis, they have instead been summarised and included in Appendix D of this report.

Responses to the Consultation

3 Responses to the Consultation

3.1 Number of responses

In total, **5,720 responses** were received within the consultation period. Responses were received via a number of different response channels, the breakdown of which is set out below:

Response Channel	Count
Online response form	2,880 *
Letters and emails sent to the consultation response address <i>Responses submitted by post not using the response form structure (letters, emails, postcards, reports)</i>	638
Organised campaign responses <i>Responses where it has been identified that many identical or near identical copies were submitted</i>	3,212 **
Responses from stakeholder organisations <i>Those classified as stakeholder organisations include elected representatives, action groups, aviation groups, community groups, and local government organisations, including county, district, parish and town councils</i>	122 ***
Total	5,720

* Please note that 1,132 respondents included a full or partial campaign response along with their submission. Campaign responses are summarised in Chapter 8.

** Includes campaigns submitted on the response form.

*** Two MPs also sent in letters from their constituents. These responses are included in the analysis in this report.

At the data processing stage, a number of duplicate responses were identified, where an individual or organisation had submitted more than one identical response via the same response channel. Where these instances were identified, the duplicate was removed from the final dataset and excluded from the final tally of responses.

3.2 Bespoke responses

Some respondents chose not to use the online response form and instead submitted bespoke written comments via letter and email. Respondents using the online response form were directed to the consultation document and answered specific questions about the proposals being consulted upon. It could not be known to what extent respondents submitting bespoke letters or emails were aware of or read the consultation document or whether they were aware of the wording of the questions on the consultation proposals.

3.3 Organised campaign responses

It is common in high profile public consultations for interest or campaigning groups to ask their members, supporters and others to submit responses conveying the same specific views. Where identically worded responses have been received (either as letters or emails) these have been treated as *organised campaign responses*. A total of **3,212** organised campaign responses are reported on separately from bespoke responses – please see Chapter 8.

Table 3.2 Organised campaign responses submitted as part of the Gatwick Local Area Consultation

		Total Responses	Email and Post	Online
Campaign 1	Planes Over Penshurst	1,347	1,338	9
	Map 1 - Chiddingstone	271	271	0
	Map 2 - Penshurst	595	595	0
	Map 3 - Broad Swathe	481	472	9
Campaign 2	CAGNE	1,223	271	952
	CAGNE	569	33	536
	CAGNE East	632	216	416
	CAGNE – Requested not to be part of campaign	22	22	0
Campaign 3	Gatwick Obviously Not	193	193	0
	Formal Complaint to CAA	181	181	0
	Delivery Discussion Paper	12	12	0
Campaign 4	London Airspace Change	155	149	6
	Penshurst Part 1	41	38	3
	Penshurst Part 2	35	35	0
	Chiddingstone	56	53	3
	Bidborough	23	23	0
Campaign 5	Betchworth / Brockham Parish Council	118	0	118
Campaign 6	Broad Swathe from the East	51	49	2
Campaign 7	Penshurst Parish Council Campaign	44	2	42
Campaign 8	The RWY08 Route	38	37	1
Campaign 9	Flights, Nights, Heights	16	16	0
Campaign 10	Hartfield Campaign	15	13	2
Campaign 11	Increased flights over Chiddingstone, Hever and Penshurst Campaign	12	12	0
Total		3,212	2,080	1,132

3.4 Analysis of responses

Analysis of the responses to the consultation questions required coding of the data. Coding is the process by which responses are matched against standard codes Ipsos MORI has compiled, so that their content can be summarised, classified and tabulated. Each of these codes represents a discrete issue or viewpoint raised by a number of respondents in their verbatim responses.

The complete coding frame is comprehensive in representing the whole range of issues or viewpoints given across all of the responses. The codes were continually developed throughout the consultation period as further responses were coded to ensure that any new viewpoints that emerged were captured and no nuances lost. Any one response may have had a number of different codes applied to it if a respondent made more than one point, or addressed a number of different themes or viewpoints. Comments were coded in the section of the code frame they related to rather than on a question-by-question basis.

The coding and data handling procedures are set out in more detail in Appendix B, and the list of codes into which responses were classified (together with the number of responses falling into each code) is provided in Appendix E. The same code frame was developed for analysing both response forms and letters/emails from the general public.

The responses from stakeholder organisations tended to be more detailed. While those who responded using the structured response form were coded using the code frame, our analysis of the 122 responses from stakeholder organisations, submitted online, by letter or via email were more qualitative in nature. The key themes and issues were drawn out, commented on and summarised, rather than being coded into the structured code frame. A full list of the stakeholder organisations that responded are found in Appendix C. The list excludes those that requested confidentiality.

3.5 Interpreting the consultation findings

While a consultation exercise is a very valuable way to gather opinions about a wide-ranging topic, there are a number of issues to always bear in mind when interpreting the responses received. While the consultation was open to everyone, the respondents were self-selecting, and certain types of people may have been more likely to contribute than others. This means that the responses are not representative of the population as a whole, as would be the case with a sample survey.

Typically with consultations, there can be a tendency for responses to come from those more likely to consider themselves affected and more motivated to express their views. In previous consultations, we have found that responses also tend to be more biased towards those people who believe they will be negatively impacted upon by the implementation of the proposals. Responses are also likely to be influenced by local campaigns.

It must be understood, therefore, that the consultation as reflected through the report can only hope to catalogue the various opinions of the members of the public and organisations who have chosen to respond to the proposals. It cannot measure in fine detail the exact strength of particular views or concerns amongst the general public, nor may the responses have fully explained the views of those responding on every relevant matter. It cannot, therefore, be taken as a comprehensive, representative statement of public and business opinion.

While attempts are made to draw out the variations between the different audiences, it is important to note that responses are not directly comparable. Across the different elements of the consultation, respondents

received differing levels of information about the proposals. Some responses are therefore based on more information than others, and may also reflect differing degrees of interest across respondents. The response form sign-posted relevant chapters of the full consultation document for the respondent, but of course it is not known to whether each respondent read the document, or the summary in full.

It is important to note that the aim of the airspace consultation processes is not to gauge the popularity of a proposal *per se*; rather it is a process for identifying new and relevant information that should be taken into account in the proposal alongside the existing guidance. All relevant issues are therefore considered equally whether they are raised by a single respondent or a majority; consultation is not a voting process.

3.5.1 Definition of stakeholder organisations

Those who responded on behalf of an organisation or group were classified as stakeholder organisation responses. Those classified as stakeholder organisations included elected representatives, action groups, aviation groups, community groups, and local government organisations (including county, district, parish and town councils). A full list of the organisations that took part (excluding those that requested confidentiality) can be found in Appendix C.

3.5.2 Definition of general public respondents

Respondents who said they were providing their own response in the online response form were generally classified as members of the public, unless it was clear from their response that they were responding on behalf of a group or organisation. Those who responded by email or letter (i.e. not using the online response form) were classified as members of the public, unless it was clear that they were responding on behalf of an organisation or group.

3.6 Free-text responses

The consultation included a number of free-text questions which were exploratory in nature and allowed respondents to feed back their views in their own words. Not all respondents chose to answer all questions, as they often had views on certain aspects of the consultation, and made their views on these clear, but left other questions blank. Therefore, there were many blank responses to certain questions. The figures in this report are based on all respondents commenting on the issues relating to the question (i.e. excluding those who did not answer) and this means that the base size (number of people the results for the question are based on) is different for each question.

While some figures may seem small given the scale of the overall consultation, all those reported on have been highlighted due to their importance relative to other themes.

A number of verbatim comments are included in this report to illustrate and highlight key issues that were raised. These are included in the report in italics. It is important to remember that the views expressed in these verbatim comments do not always represent the views of the group as a whole, although in each case the verbatim is representative of, at least, a small number of respondents.

3.7 Reading the report

Each of the main chapters of this report follows the individual sections of the online response form.

- **Chapter 4** contains a summary of responses about the options put forward for Runway 26 (RWY26) departures heading to the south, and Runway 08 (RWY08) departures heading to the east/north east.
- **Chapter 5** summarises responses about proposals for GAL to seek changes to the current DfT noise abatement requirements, so that night time arrival respite routes could be implemented for RWY26 and RWY08.
- **Chapter 6** contains a summary of responses about proposals to re-centre and narrow published NPRs, as well as shortened NPRs, and whether GAL should consider NPR swathes with variable swathes as a more accurate portrayal of where aircraft actually fly.
- **Chapter 7** covers a summary of the general points that were made which are beyond the scope of the issues consulted upon, or where it was not possible to link a response to a particular question. In a number of cases this will have been because the respondent did not make clear which questions they were referring to – and is most likely to be prevalent in unstructured responses via email and post. Ipsos MORI has attempted to assign responses to the questions in the consultation, but it is not always possible to do this. In a number of cases, respondents also have made points outside of the scope of the consultation. These points are also briefly covered in this chapter.
- **Chapter 8** includes a summary of each of the organised campaigns that were received during the consultation period (campaigns are also listed in Table 3.2 of this report). Where respondents made additional bespoke comments with campaigns, these have been coded and are included alongside the summary of each campaign wherever the additional points have been made.

Each of the main chapters (i.e. Chapters 4-7) are set out with commentary on stakeholder organisations, followed by members of the public who responded using the online response form. Responses from members of the public who responded by email or by letter are then summarised.

Given that stakeholder organisations are a diverse group with many different points to make, all responses to open/free-text questions, and to stakeholder emails and letters were summarised rather than being coded with the structured responses.

All responses have been analysed in full and the points made by members of the public who responded online, or by letter or email, have been coded and included in the marked-up code frames in Appendix E of this report. This includes responses to every question as well as general comments, and comments about how proposals might impact specific areas or places. All mentions of location have been included regardless of whether a location was just mentioned once by one respondent, or many times by a relatively large number of respondents.

3.8 Area analysis

Responses from members of the public have been further broken down by area to highlight responses where the postcode given was from within the area more likely to be affected by the particular options. Maps of the areas are provided in the relevant sections.

Area analysis was undertaken using the respondent postcode where provided. It is worth noting that some members of the public did not provide an address/postcode, and therefore cannot be included in the area analysis. Please note that all respondents are included in the main findings, regardless of whether or not they provided an address/postcode.

Analysis of Consultation Responses

4 Options for departures

4.1 Overview

This chapter provides a summary of responses to the consultation which addresses Question one and Question two on the response form, as well as unstructured responses via email and post that make reference to issues relating to options for departures heading to the south (Q1) and to the north / northeast (Q2).

Question wording (Response Form)

RWY26 Departures

Q1a.

Which ONE of the SIX alternative proposed options, if any, do you believe provides the best balance of benefits for RWY26 departures?

Q1b.

Which, if any, noise concerns do you believe to be the most important for Gatwick Airport Limited to consider when determining the best option for RWY26 departures heading to the south?

Q1c.

If Gatwick Airport Limited were to implement the proposed route, what width NPR swathe do you think is most appropriate?

Q1d.

If you have answered question 1c, what were the reasons for your choice?

Q1e.

What, if any, comments or suggestions do you have about the options put forward for RWY26 departures heading to the south?

RWY08 Departures

Q2a.

Compared with today's routes, do you believe the proposed realignment for RWY08 departures to the east/northeast of Gatwick Airport is better or worse?

Q2b.

Which, if any, factors do you believe to be the most important for Gatwick Airport Limited to consider when determining whether to realign the RWY08 departures to the east/northeast?

Q2c.

If Gatwick Airport Limited were to implement the proposed route, what width NPR swathe do you think is most appropriate?

Q2d.

If you have answered question 2c, what were the reasons for your choice?

Q2e.

What, if any, comments or suggestions do you have about the proposals for the realignment for RWY08 departures to the east/north east?

Summary of consultation responses

Stakeholder organisations

Presented with a list of options on the response form that would most provide the best balance of benefits for RWY26 departures, most stakeholder organisations that responded preferred *none of the options*, or *did not know*. Positive comments included that the proposal would lead to less over-flying of some areas, but others were negative as they believed the proposal would lead to increased air traffic over their own area. Key noise concerns included noise during the day that impacts quality of life; at night that disturbs sleep; and over populated areas. While some stakeholder organisations preferred wide NPR swathes for respite purposes, others preferred very narrow swathes as less people would be blighted by aircraft. A few stakeholder organisations were concerned that while proposals would lead to improved efficiencies for Gatwick Airport, this would serve to increase negative impacts for local residents and businesses as a result of increased departures.

While some stakeholder organisations indicated that they prefer wide NPR swathes for respite purposes, others indicated they preferred very narrow swathes as less people would be blighted by aircraft. In both cases the response has misinterpreted the role of NPRs. The consultation material described how the width of NPRs does not actually affect where aircraft fly as they are a primarily a containment area for assessing how well aircraft can adhere to the centre of the route. A wider NPR does not lead to more dispersal, nor does a narrower NPR lead to less. Please see Chapter 4 in the Consultation Document for more details.¹

More organisations said that the proposal to realign RWY08 would make things worse rather than better. Noise was again a key concern. Factors for GAL to take into consideration when determining whether to realign RWY08 included noise over Areas of Outstanding National Beauty AONBs and National Parks; noise in the day that affects quality of life; and noise over the countryside in the day time. As with proposals for RWY26, opinion was divided on the optimum NPR width, and similar concerns were raised about impact on house prices, tourism, and the local economy. Positive comments about the proposal included that previous concerns had been taken into account; that the proposal would lead to less noise; and that some settlements would not be over-flown. Negative impacts included more noise for those over-flown, and scepticism about the motives behind the proposal.

Members of the public

Most of those who responded to the question about the best option for RWY26 departures preferred *none of the options*, or *did not know*. Key noise concerns were noise in the day that affects quality of life; noise at night that disturbs sleep; potential noise impact on house prices; and noise over populated areas at night. Preferences were divided over the width of the NPR swathe that would be most appropriate for RWY26. While many preferred *none* of the widths, or *did not know*, a few respondents suggested that NPR swathes should be narrower than 500 metres, and others suggested they should be wider than 20km.

In terms of the Options for RWY26, a considerable number of negative comments were made – in

1

http://www.gatwickairport.com/PublicationFiles/business_and_community/all_public_publications/aircraft_noise/Airspace%20consultation/Airspace_consultation_document.pdf

particular about the ADNID Trials in terms of the negative impacts on areas over-flown.

More respondents believed that the impact of the proposal to realign RWY08 would be worse than better. Similar concerns about noise were raised that were also raised about RWY26. And as with RWY26 proposals, opinion was divided as to the optimum width of the NPR, with many again saying *none of these*, or *don't know*. Supportive comments were made by a small number of respondents, including that the proposal was a good idea, and would be welcomed; and that fewer people would be affected. A few members of the public also said that the proposals would benefit the countryside, and reduce impact on elevated areas. Negative comments included concerns about noise; general impact on local communities and on quality of life.

4.2 Stakeholder organisations: RWY26 Departures

The proposed options

There were 41 stakeholder organisations that answered **Question 1a** on the response form which asked about which one of the six alternative proposed options, if any, would best provide the best balance of benefits for RWY26 departures. Most stakeholder organisations said *none of these* or *don't know* (16 and 15 stakeholder organisations respectively). Of those that selected one of the six options, responses were as follows:

- Option A (2 responses)
- Option A with night time respite (3)
- Option B (none)
- Option B with night time respite (1)
- Option C (none)
- Option C with night time respite (4)

Noise concerns

There were 41 stakeholder organisations that answered **Question 1b** on the response form which asked about which, if any, noise concerns respondents believed to be the most important for GAL to consider when determining the best option for RWY26 departures heading to the south. The main concerns raised by frequency of response were:

- Noise during the day that impacts quality of life (24 responses)
- Noise at night that disturbs sleep (23)
- Noise over populated areas at night (21)
- Potential noise impacts on house prices (19)

A few stakeholder organisations provided additional comments at Question 1b. Seraphina Mind Studio said that they moved to their current location at Stane Street, Horsham specifically for the peaceful location due to the nature of their work and that they have invested in buying and renovating their premises. The Fordcombe Society mentioned a hospital and a nursing home within the village of Fordcombe that could be affected by aircraft noise. Farlington School Trust Ltd said that as Farlington School in Strood Park, Horsham was a residential school, the Trust would be concerned by noise both by day and night. Warnham Parish Council raised concerns about noise impact on Warnham Deer Park and the Warnham Conservation Area.

NPR swathes

There were 31 stakeholder organisations that answered **Question 1c** on the response form. This asked what width NPR swathe would be most appropriate if GAL were to implement the proposed route. Six stakeholder organisations said that a 2km wide NPR swathe would be most appropriate, three stakeholder organisations said 1km, and four suggested 500 metres. There were 11 stakeholder organisations that didn't know, and six said that none of the options would be appropriate.

There were 10 stakeholder organisations that made additional comments at Question 1c. Some of these organisations, including Godstone Village Association (claiming to represent the interests of the village of Godstone and its surrounding area), and the Councillor for Penshurst, Fordcombe and Chiddingstone Ward (Sevenoaks) said that NPR swathes should be as wide as possible to allow respite for those who live underneath the flight paths. Conversely, other stakeholder organisations, including Rowhook and Clemsfold Amenity Society (an organisation which claimed to represent all households in the villages of Rowhook and Clemsfold) said that smaller swathes are better as less people are affected. CAGNE and North Horsham Parish Council said that existing NPR swathes should not be changed.

No new NPRs...to narrow the swathe and concentrate the path of a constant stream of planes will bring total misery to the people below

CAGNE

Overall, 23 stakeholder organisations answered **Question 1d** which asked what their reasons were for their answer to Question 1c. These reasons were that NPR swathes:

- affect house prices (11 responses)
- should indicate potential noise impact from over-flights of nearby areas (7)
- should only cover areas that are likely to be directly over-flown (6)
- affect tourism (6)
- affect the local economy and investment in the area (2)

Additional comments and suggestions

A number of stakeholder organisations provided comments at **Question 1e** on the response form or via emails and letters that made reference to the proposed options for RWY26 departures. Withyham Parish Council, Park Lane Reigate Residents' Association (an organisation claiming to represent 60 households on Park Lane, Pilgrims' Mews, Stable Mews, Green Lane, Wesley Close and Littleton Lane - an area extending south from Reigate High Street to South Park), and Weald Action Group Against Noise (an organisation claiming to represent the views of residents of Sevenoaks Weald) said that the proposals were not relevant to them.

Some stakeholder organisations made specific comments on one or more of the proposed options. These are summarised below.

Option A

Rudgwick Parish Council said that while they would prefer no change to the current departure routes, if forced, the Council would have a slight preference for Option A (although the Council did not explain further why this was). Mole Valley District Council supported Option A as this would result in a reduction of overflight of residents living close to the southern boundary of the district, including Okewood Hill and Wallis Wood.

Surrey Hills AONB said that while Option A appeared to offer the least damage to the tranquillity of the Surrey Hills, it would still impose more noise than would be desirable. The organisation also said that while

the Surrey Hills AONB is not as populated as other areas in the Gatwick Airport area, many residents live there because of its relative peace and tranquillity.

Farlington School Trust Ltd said that while all of the proposed RWY26 departure options offered adversely impact on Farlington School (which is both an educational establishment with overnight boarding and a community resource), Option A would be the worst option.

Option B

Some organisations, including Seraphina Mind Studio and Rowhook & Clemsfold Amenity Society said that both Option B and Option A would be detrimental for residents and businesses, in particular those who are not currently under NPRs. These organisations were particularly concerned about increased noise if either option were to be implemented.

Option C

Tunbridge Wells Borough Council initially opted for Option C with night time respite. The Council said that it supported any initiative to get aircraft as high as possible as quickly as possible. However, the Council also said that it would favour an option that allowed day time respite for take-offs and night time respite for residential properties that are the worst affected by take offs at night, but that more information was needed in order to make an informed decision.

Burstow Parish Council said that areas not previously over-flown should be avoided unless it can be clearly shown to be over a much lower populated area or there is no option when all the airspace problems have been investigated. The Council said it chose Option C for this reason.

Waverley Borough Council raised concerns about Option C. The Council said that this option would result in an increase in the number of flights and frequency of over-flying. While it was acknowledged that noise that may result from increased flights in the future, this could be offset by the use of more modern aircraft which would be quieter and climb faster. However, the Council was concerned that the proposals would result in increase in noise for some residents in the day time, with negative impacts on quality of life, business and community facilities over-flown. The Council was also concerned about potential for sleep disturbance both in residential properties and residential community facilities at night.

Horsham District Council selected Option C with night time respite on the response form. However, the Council then sent a separate letter to GAL to clarify its position. In the letter the Council said that it felt unable to shape its response in a clear and structured way due to the format of the consultation.

Please note that our response to Question 1a was not in support of an option but was a considered view of the relative balance of benefits. We were concerned that by not answering question 1a we would be indicating that we were equally dissatisfied with ALL of the 3 options; when the reality is that we were more concerned with Options A and B and wished to reflect this in our response.

Horsham District Council

General comments and concerns about the proposal

Of the organisations that did make comments on the proposals, the main comments focussed on opposition to what was being proposed.

The Trustees to the Frontagers (an organisation claiming to represent householders in High Broom Lane, Crowborough) believed that none of the proposed options were in anyone's interest, and they disagreed

with proposed new NPRs and new flight paths. Keep Rusper Green (a group representing those living in the village of Rusper and the surrounding households within the Parish) were also opposed to all of the proposed options. The organisation made reference to the ADNID trial resulting in noise over new areas not previously over-flown, and made suggestions about alternatives ways that GAL could achieve its objectives.

The very marginal (although not yet substantiated claims) of additional capacity simply cannot be justified by the number of flights that would pass down the new flight path...we feel that GAL should consider alternative ways of achieving its aims that do not necessitate new flight paths or changes to NPRs. Examples include less ambitious scheduling at peak periods and pricing regimes that would incentivise traffic away from the busy peak periods...we strongly encourage the adoption of the NADP1 protocol by the airport. We are also upset by the absence of any day time respite options.

Keep Rusper Green

Parish councils in particular were opposed to the proposals due to negative impact on local areas, and those over-flown, especially those who would be newly over-flown if proposals were implemented. Slinfold Parish Council rejected all of the options for RWY26 departures, opting for none of the proposed options. Warnham Parish Council also disagreed with the proposed options and said that no new flight paths would be needed, and that there is no proven case to change existing NPRs). Other parish councils, including West Grinstead, Newdigate, North Horsham and Capel did not support any of the options.

The Parish Council feels that there should be no new flight paths over areas that were previously unaffected

North Horsham Parish Council

A number of other organisations were also concerned by the proposal in terms of further noise impact and other negative consequences for local people and local communities over-flown or newly over-flown.

- Warwick Park Area Residents Association mentioned that areas of high population must not be over-flown, and specifically Royal Tunbridge Wells itself.
- Cranleigh Parish Council was concerned that if the proposals for RWY26 departures were to move flight paths closer to Cranleigh village, the Council would strongly object given negative impact on significant numbers of residents underneath the flight path.
- East Grinstead Town Council was concerned about any increase in air traffic as this would impact on East Grinstead residents.
- The Gatwick Area Conservation Campaign (GACC) asked GAL not to implement any proposal for new departures to the west as this would only serve to transfer negative impact from one set of villages to another. GACC stated that “*none of the proposed changes would be necessary or urgent, and that all of the proposed new routes would be environmentally unacceptable*”. It also said that “*...none of the proposed routes should be adopted, and that all flights should remain on the existing NPR*”.
- Langton Green Village Society (an organisation claiming to represent the residents of Langton Green Village) also said that the proposals would be unnecessary and that there was no proven need, other than proposals, if implemented, would benefit the airport at the expense of local communities.

- Holmwood Lodge Estate Residents Association (an organisation claiming to represent residents in North Holmwood, Dorking) was concerned that changes to RWY26 route DVR/BIG/CLN from previously flying over farmland, to over North Holmwood would have negative implications for residents.

Consequences of increased departures and improved efficiencies

A few organisations were concerned that the proposals would improve efficiency by increasing the number of aircraft departures in peak periods. Coneyhurst Concern Group (an organisation claiming to represent Coneyhurst residents) said that while proposals would not unreasonably impact on Coneyhurst, the organisation objected to one minute separation of aircraft departures given that it would result in more aircrafts taking off and consequently, increased noise.

Heathrow Airport Ltd made reference to paragraph 3.14 in the consultation document which stated that airspace change would accommodate more departures per hour during periods of high demand, and that it “requests assurance that a simulation of this increase has been undertaken by NATS and confirmation that this increase would have no impact on the Heathrow operation in terms of TC capacity and regulation”. The Communities Against Noise and Emissions group (CAGNE) also voiced concerns about increased departures.

Support for respite

Despite many of the stakeholder organisations being critical of, or against the proposed options, some of the organisations that responded mentioned that respite was extremely important to provide relief for communities over-flown.

The provision of respite for communities is vitally important but this needs to be carefully considered so as not to create situations where the use of different routes creates disturbance for communities not previously over-flown. It is considered that there is a need for respite and the need therefore for wide swathes to ensure greater potential for respite along routes rather than narrow swathes.

Tandridge District Council

4.3 Stakeholder organisations: RYW08 Departures

Proposed realignment of RYW08

There were 37 stakeholder organisations that answered **Question 2a** on the response form that asked respondents if they believed that the proposed realignment for RYW08 departures would be better or worse, compared to today's routes. Eight stakeholder organisations said the proposal would make it better, and twelve organisations said that the proposal would make it worse.

Noise concerns

A total of 38 stakeholder organisations answered **Question 2b** on the response form which asked respondents about the factors most important for GAL to consider when determining whether to realign the RYW08 departures to the east/northeast. The main factors raised by frequency of response were about noise:

- over AONBs or National Parks (20 responses)
- in the day that affects quality of life (16)
- over the countryside in the day time (16)
- at night that disturbs sleep (15)
- over the countryside at night (14)

Five stakeholder organisations made additional comments at Question 1b. Three of these organisations (Rowhook and Clemsfold Amenity Society / Seraphina Mind Studio / Rudgwick Parish Council) mentioned that the proposals would not affect them. Langton Green Village Society said that it was difficult to answer the question from the data provided. Hever Parish Council mentioned respite.

NPR swathes

A total of 26 stakeholder organisations answered **Question 2c** on the response form asking about what width NPR swathe would be most appropriate if GAL were to implement the proposed route. Two stakeholder organisations said that a 2km wide swathe would be most appropriate; one stakeholder mentioned 1.5km; three said 1km, and two said 500 metres. Eleven said that they didn't know, and seven said none of the options would be appropriate.

Twelve stakeholder organisations made additional comments at Question 1c. Many of these organisations (including Chiddingstone Castle; Sevenoaks Weald; Godstone Village Association; and The Fordcombe Society), said that they supported as wide an NPR swathe as possible to allow as much respite as possible to people over-flown.

Overall, 20 stakeholder organisations answered **Question 2d** which asked what their reasons were for their answer at Question 1c. By frequency of response, these reasons were

- NPR swathes should indicate potential noise impact from over-flights of nearby areas (9 responses)
- NPR swathes affect house prices (8)
- NPR swathes affect tourism (8)
- NPR swathes affect the local economy and investment in the area (6)
- NPR Swathes should only cover areas that are likely to be directly over-flown (6)

There were seven stakeholder organisations that provided additional comments at Question 1d. Reasons included for health reasons, and to reduce pollution; that maximum respite should be offered; and that there should be no increase in the number of people over-flown.

Maximum respite should be offered to the over-flown. In our view that can be achieved by multiple narrow NPRs to ensure maximum respite.

Chiddingstone Castle

Additional comments and suggestions

A number of stakeholder organisations provided comments at **Question 2e** on the response form asking respondents if they had any comments or suggestions to make about the proposals for the realignment for RWY08 departures to the east/north east.

Positive comments

Some stakeholder organisations provided positive comments about the proposal to realign RWY08. These included:

- Nutfield Conservation Society (an organisation comprising residents concerned about environmental threats to the parish of Nutfield) were pleased to note that previously expressed concerns regarding aircraft turning north at 4,000ft had been taken into account and that most departures to the east would now continue in that direction. The consultation summary refers to occasional flights being permitted by flight control to turn north but this will only involve aircraft flying at over 7,000ft which has considerably less impact on residents.
- Penshurst Parish Council provided support with the caveat that the swathe is directly linked to the fact that there will be no increase in the population that are affected and no increased intensity of over-flying for any population. Conversely, there would in fact be a decrease in the nuisance caused.
- Westerham Town Council strongly supported the removal of the North East LAM route and resultant traffic transfer to the DVR/BIG/CLN due East routing as shown on map 26 in the consultation document. Lord and Lady Harris of Peckham and Burstow Parish Council were also supportive of the proposed departure route.
- Hever Residents Association and Bidborough Parish Council both said they supported the alignment that has been drawn up on the basis of feedback from Kent County Council and other stakeholders. Both organisations said that there would be a decrease in nuisance caused, which would be positive.
- Crawley Borough Council said that while there was insufficient information to make a full and proper assessment, the realignment of RWY08 departures to miss settlements would potentially be a positive move. The Council said that if the proportion of diverging traffic to the north east was to remain similar to today, the route change would have some justification. But if the proposal was ultimately to direct all traffic along the new route, then the increased traffic over the latter half of the route would not be justified.

Negative comments, concerns and suggestions

Noise impact

Noise impact was a key concern amongst stakeholder organisations.

- Weald Primary School, Chiddingstone Church of England School, and Penshurst Primary School raised concerns about how the proposals would impact teaching and learning, as well as on the health of pupils and students given pollution and emissions from overhead flights.
- A few organisations, including Godstone Village Association, were concerned that realignment of RWY08 would unfairly blight people's homes and businesses, meaning more people would be affected without any compensation.
- Sir John Stanley, MP for Tonbridge and Malling was opposed to realignment of RWY08. He said that the proposal would aggravate the situation for constituents both during the day and at night *"(the proposal) will make the already intolerable noise disturbance...still more intolerable."*
- Other organisations were sceptical about the motives behind the proposals. This included Edenbridge Town Council that commented that proposals would add further noise contagion to the existing route configuration. *"The number of movements to be transferred to the west/east DVR/BIG/CLN route is not inconsiderable, adding further to the noise issues which this routing already creates...what it appears to be doing is to drag the existing centreline northward, closer to Marsh Green and south Edenbridge which already bear the considerable brunt of flights landing on RWY26 inbound activity and now it seems RWY08 outbound activity."*
- Kent County Council said that NPRs have long been established, therefore any changes to the boundaries will cause distress to those newly affected and this is not acceptable.
- Furpine Residents Association in East Grinstead said that in recent years, departing aircraft using the eastern segment of the 3km NPR swathe has had a major impact in terms of noise and pollution on residents of Felbridge and East Grinstead. *"The proposal changes to the NPR swathe outlined in the consultation document will result in a re-centering and narrowing of the current departure route (RWY08) will create an even greater impact on the communities of Felbridge and East Grinstead."*
- High Weald Councils Aviation Group and Chiddingstone Parish Council said they did not support the alignment that has been drawn up on the basis of feedback from Kent County Council and other stakeholders. Opposition was based on the 500m NPR indication that a negative population figure of -3,900 would be achieved by imposing an intolerable burden on those who remain over-flown.

Impact on the environment and heritage sites

A few stakeholder organisations were concerned that the proposals would have a detrimental impact on the environment and heritage sites.

- Hever Castle was concerned about the impact the proposals would have on the site. The organisation mentioned that it already suffers adversely from RWY26 arrivals, and that realignment of RWY08 would bring flights closer to the castle, which would be audible. While Hever Castle could see benefits of the proposals on areas to the south, such as Markbeeceh, it was concerned about further negative impacts on the castle.
- Some organisations were concerned about the impact of the proposals on elevated areas. Westerham Town Council mentioned that Kent High Chart and the North Downs would be adversely affected. The Council said that the assessment of noise levels against height above sea level is inappropriate in considering the impact on communities on these hills. The Ashdown Forest Tourism Association mentioned a need to safeguard the forest from excess noise, pollution and congestion caused by increasing numbers of staff and support agencies to Gatwick Airport, which they worried would happen as a result of the proposals. The National Trust was also concerned that the proposed route would lead to increased aircraft movements over National Trust property at Chartwell, Chiddingstone, Crockham Hill Common & Mariners Hill, Toy's Hill, Emmetts Garden, Ide Hill, Knole House & Park, Sevenoaks, Quebec House and Holmwood Common in Surrey. The National Trust said that these are places where people spend leisure time and deserve priority for compensation or mitigation to the built heritage environment.
- High Weald AONB Unit, was keen to point out the Ashdown Forest is a particularly sensitive area in terms of aviation. However, the organisation supported the proposals as they would lead to less over-flying in sensitive areas, and appeared to be the best solution.

The smaller villages and towns and sensitive spots such as Ashdown Forest, Hever Castle etc. appear to have less over-flying and, on the basis of these NPR having effective respite operations would be in general acceptable.

High Weald AONB Unit

Suggestions

Several stakeholder organisations made suggestions about the proposals to realign RWY08.

- Hever Parish Council said that RWY08 departure routes following the BIG/DVR/CLN NPR and RWY26 arrival routes should be as far apart as possible thus ensuring, when RWY08 is being used, that the maximum possible respite can be achieved for residents over-flown by arriving aircraft when RWY26 is in operation.
- Langton Green Village Society suggested that the need for additional runway capacity at Gatwick was not proven. The organisation suggested that the proposals were not in the interested of local communities, but for commercial gain of the airport.
- East Grinstead Town Council suggested that while the proposed realignment would appear to be better for East Grinstead, settlements north of the town would be further impacted. The Council said that “...realignment is not acceptable to simply shift a problem to another settlement or area.

Solutions must be sought and a commitment concerning mitigation for the environment is uppermost”.

- Cowden Parish Council said that the disruption today through noise and impact to the quality of life should not be further impacted.
- Tandridge District Council said that a number of parishes are affected by outbound noise in the southern part of the district. The Council said that these Parishes need special consideration in the on-going design process as do establishments in these Parishes, for instance St Piers School, St Piers College and Lingfield Notre Dame School in Dormansland Parish. Any change should not create more of an environmental impact on these residential areas and such establishments. It is considered that the current width of the existing NPR should be retained. The reason for this response is to allow flexibility for respite.
- Tonbridge Civic Society suggested that a central consideration of the proposals should be to ensure that there is no increase in population over-flown nor intensity of flights.
- High Weald Council’s Aviation Group suggested that maximum respite should be offered to the over-flown. *“In our view that can be achieved by multiple narrow NPRs to ensure maximum respite.*
- Sevenoaks District Council was supportive of the principle of the closure of the LAM route, on the basis that it would reduce the number of people in Sevenoaks affected by aircraft noise.

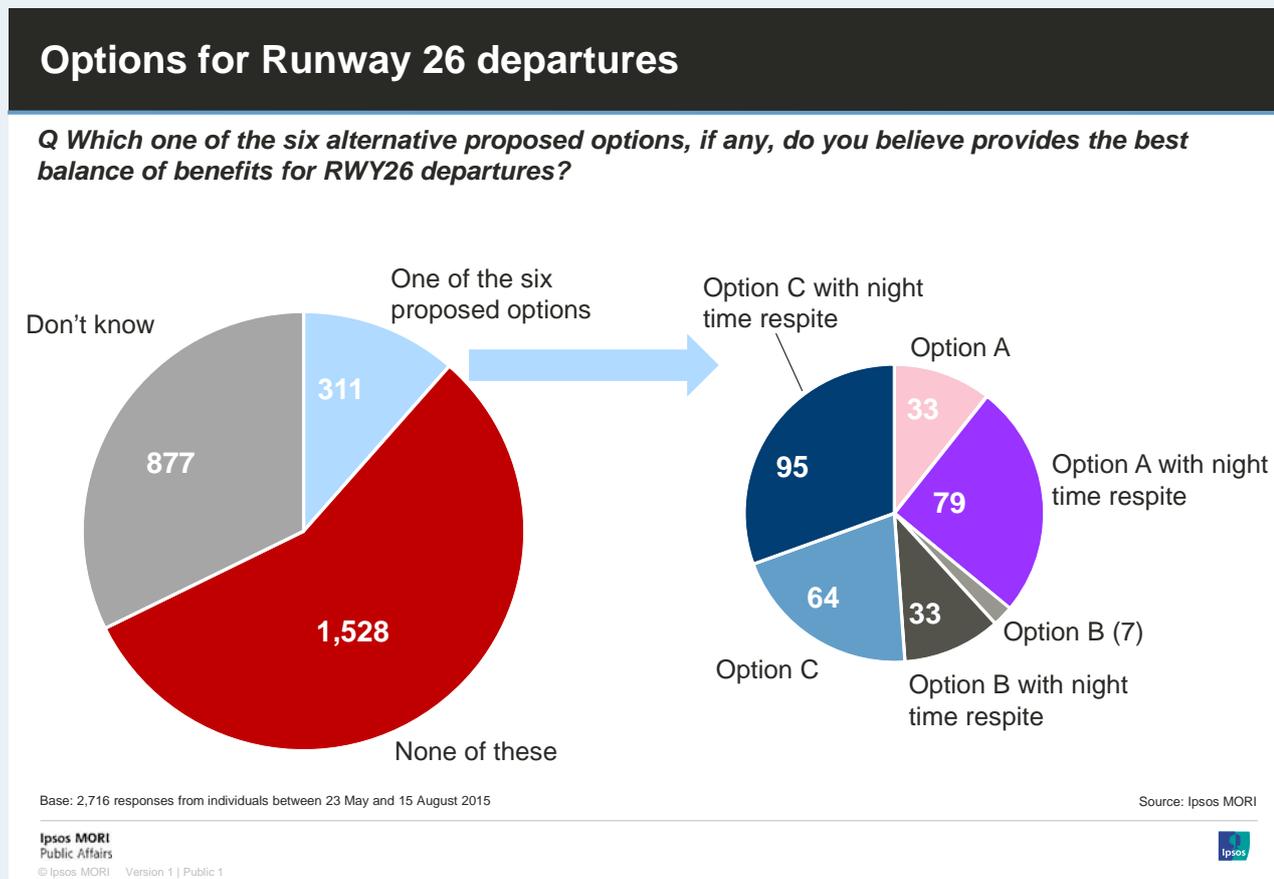
4.4 Members of the public: RWY26 Departures

Response form

There were 2,716 members of the public who answered **Question 1a** on the response form. The question asked about which one of the six alternative proposed options, if any, would best provide the best balance of benefits for Runway 26 departures.

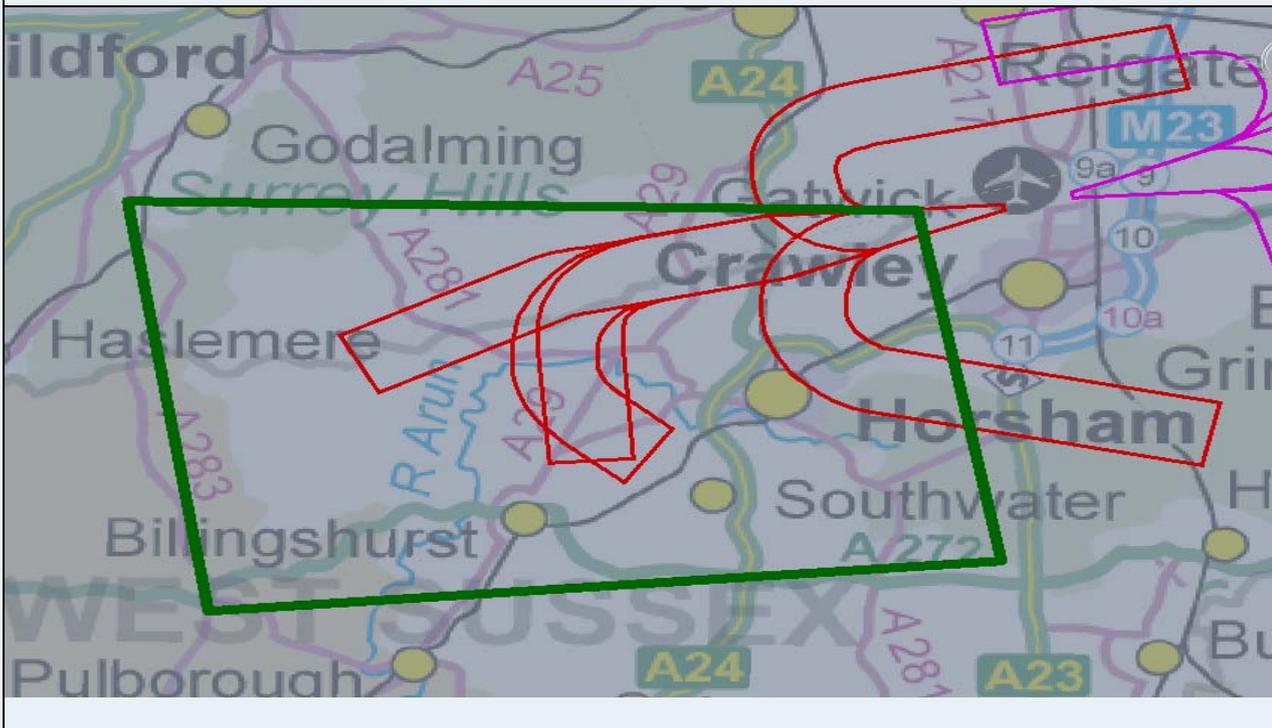
The consultation aimed to gain an understanding about respondent preferences with respect to different design options, however, a large proportion of respondents used the consultation to register a more general objection to any change at the airport, answering “*none of these*”.

The chart below shows these responses, but also shows a comparison of the presented options.



The map and chart below shows the responses to Question 1a for respondents with a postcode within the area most likely to be affected by the proposal.

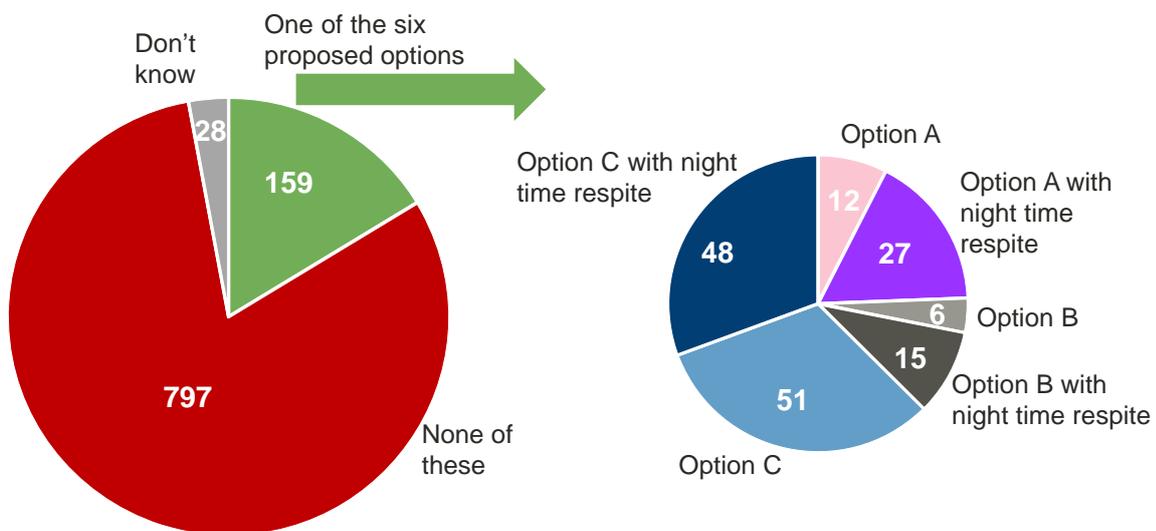
Map 4.1 – Geographical analysis of general public responses



Further analysis of the preferred options shows that Options A and C (and the respite variations of) were generally favoured over Option B. The response maps in Appendix E show that members of public responses were from the cluster of villages around the Alford/Ifold area nearest Option C, and the Warnham/Horsham area in the south which was closer to Option A.

Options for Runway 26 departures – Green Area

Q Which one of the six alternative proposed options, if any, do you believe provides the best balance of benefits for RWY26 departures?



Base: 984 responses from individuals between 23 May and 15 August 2015

Source: Ipsos MORI

A total of 2,713 members of the public completed **Question 1b** on the response form asking about which, if any, noise concerns respondents believed to be the most important for GAL to consider when determining the best option for RWY26 departures. This includes 980 members of the public who resided within the area most likely to be affected by the proposal (see Map 4.1).

Respondents were presented with a list of 14 possible options. By frequency of response, the top concerns are shown in the table for all respondents, and also specifically of those who reside in the green area as shown in Map 4.1.

Table 4.1 Top five noise concerns	
All respondents	Respondents who resided in the Green Area only
Noise in the day that affects quality of life (1,878)	Noise in the day that affects quality of life (924)
Noise at night that disturbs sleep (1,863)	Noise at night that affects sleep (892)
Potential noise impact on house prices (1,568)	Noise impact on house prices (807)
Noise over populated areas at night (1,524)	Noise over populated areas in the day time (765)
Noise over populated areas in the day time (1,463)	Noise over populated areas at night (761)

Respondents were able to provide additional comments at Question 1b. Overall, there were 271 members of the public who raised general concerns which included concerns about the impact of aircraft of local people and communities (173); concerns about noise or additional noise (127); and concerns about flight paths (34).

A total of 19 respondents made suggestions about issues they believed to be important for GAL to consider when determining the best option for RWY26 departures heading to the south. This included that noise should not be increased (6 comments); the airport should comply with government environmental policy and/or EU Directives (5); and that flight paths should be over the countryside and unpopulated areas (2).

Other comments and suggestions included:

- Opposition to any changes to flight paths/NPRs (26 comments)
- A preference for broad NPR swathes to disperse disturbance over a wider area (10)
- Opposition to narrow flight paths (8)
- Opposition to flight path trials (7)

There were 2,684 members of the public who answered **Question 1c** on the response form which asked about what width NPR swathe would be most appropriate if GAL were to implement the proposed route. The breakdown is shown in the table below.

Table 4.2 Width of NPR swathes - by area		
	All respondents	Respondents who resided in the Green Area only
<i>Base:</i>	(2,684)	(974)
2 Kilometres	193	56
1.5 Kilometres	43	18
1 Kilometre	90	27
500 Metres	208	107
Other answer*	2,159	770
Don't know	468	217
None of these	524	66

*Respondents were allowed to include additional comments, which means that some respondents did so in addition to answering the tick-box, closed part of the question. It means that summing the total numbers will add to more than the base. A summary of additional comments is provided below.

Overall, there were 524 members of the public who said they would prefer none of the NPR swathes, and a similar number of respondents (468) did not know.

Respondents were able to provide additional comments at Question 1c. Comments included:

- **Specific suggestions about the width of NPR swathes:** a few respondents suggested that the NPR swathe should be narrower than 500 metres (4 comments), while a few others (8) suggested that the NPR swathe should be at least 20 kilometres or wider. Others suggested an alternative, including wider than 3 kilometres (14), and 10 kilometres (4).
- **More general suggestions about the width of NPR swathes:** comments included support for wide NPR swathes to enable noise to be dispersed over a wider area (56), and conversely, support for narrow NPR swathes so that fewer people would be affected (10).
- **Concerns about the impact of aircraft:** 78 respondents made specific comments about impact of aircraft. This included comments about quality of life issues (30), general concerns about aircraft noise (24), and impact on local communities and residential areas (14).
- **Opposition to changes to flight paths:** including opposition to changes in flight paths (164), opposition to narrow flight paths (48), and opposition to flight path trials (33).
- **Alternative suggestions:** 28 respondents made suggestions including comments that multiple routes should be provided to spread disruption and provide respite (7); flight paths should avoid

residential areas (6); and that NPRs should be enforced (4). There were also a few comments from individual respondents including that planes should fly at higher altitudes before turning; flight paths should comply with government environmental policy and legislation; and that flight paths should avoid specific areas, including Crowborough, Horsham Langton Green and Tunbridge Wells.

Those who provided a response at Question 1c where asked for their reasons for their choice - 1,679 members of the public answered this question. By frequency of response, answers to the tick-box or closed part of the question are shown in the table below.

	All respondents	Respondents who resided in the Green Area only
NPR swathes affect house / property prices	931	572
NPR Swathes should indicate potential noise impact from over-flights of nearby areas	475	171
NPR swathes should only cover areas that are likely to be directly over-flown	258	100
NPR swathes affect the local economy and investment in the area	206	71
NPR swathes affect tourism	166	53

Respondents were able to provide additional comments at Question 1d. Comments included:

- **General concerns:** including comments about impact of quality of life, health and well-being (47 comments); noise (41); flight path trials (18); impact on communities (18); and, comments about impact on property prices, particularly for areas that would be newly over-flown if the proposals were to be implemented (18).
- **NPR swathes / flight paths:** including support for wide swathes to alleviate noise (33); opposition to any flight path changes or changes to NPR swathes (29); and opposition to narrow NPR swathes because of economic implications (14) or negative impacts on quality of life (12).
- **Alternative suggestions:** including that NPRs should be enforced (9); flight paths should avoid residential areas (5); and noise impact should be reduced or mitigated (5).

There were 674 members of the public who provided comments or made suggestions about the options put forward for RWY26 departures heading to the south at **Question 1e**. Most of those who responded made comments about Option A. The number of respondents who made comments on each of the proposed options was:

- Option A / Option A with respite: 482 respondents
- Option B / Option B with respite: 35
- Option C / Option C with respite: 67

Option A

A considerable number of negative comments were made about Option A. In particular, many of these comments made mention of the ADNID trial that was happening at the time of the consultation. This included that the ADNID route / flight path trial is having a negative impact on quality of life, health and well-being (171); that the trial is having a negative impact on the residents of Horsham (62); the trial has increased the frequency and volume of flights over the local area (49); and that the trial is having a negative impact on residents and local communities (45).

A total of 140 respondents made comments that the flight path should revert to what it was before the ADNID trial.

Some respondents made comments about Option A without mentioning the ADNID trial specifically. The main comments here included that the option, if implemented, would have a negative impact on local people (18); that it would increase noise (12); and that it would have implications in terms of impact on health and quality of life (11).

Three positive or supportive comments were received about Option A, including that the flight path would follow major roads, and would be above areas of high ambient noise, hence having little additional impact.

Option B

There were 35 members of the public who made comments about Option B. Negative comments included that the route would be the worst option (8); that it would have a negative impact on local people (7); and that it would impact people not previously over-flown (5). Five respondents made positive comments about Option B, including that it would avoid residential areas such as Warnham (2), Capel (1), and Rusper (1). There were also a small number of comments that noise would be reduced.

Option C

This was the only option that received more positive than negative comments. Of the 67 respondents who provided comments, just under half (32) provided positive comments. The main positive comments by frequency of response were that the option would mean the least change and closest alignment to existing flight paths (11); that it would affect the fewest people (10); and that it was the best compromise (9). The main negative comments were that the option would impact on people not previously over-flown (8), and that it would have an impact of local communities in general (6).

Other comments / suggestions

There were 257 respondents who made other comments and suggestions about proposals for RWY26 departures heading to the south. The main comments focussed on opposition to all of the proposals. There were 120 comments against all options for change to RWY26 departures. Other, more specific negative comments included that all of the options would have a negative impact on residential areas (18); concerns about frequency and volume of flights for RWY26 departures (9); and that the maps in the consultation document were insufficient or lack detail to allow people to comment more fully on the proposals (5).

Some 53 respondents made a wide range of suggestions, including that southbound RWY26 departures should be spread as widely as possible so that air traffic is not concentrated over one particular area (12); and that departures should avoid populated or residential areas (10). Specific urban areas that should be avoided included Horsham (10 comments), Warnham (4), Loxwood (4), and Slinfold (2).

The table shows the top five comments by area that were made by those who responded to **Question 1e**.

Table 4.4 Top five comments by area	
All respondents	Respondents who resided in the Green Area only
ADNID route / flight path trial has increased noise in the area (173)	Negative impact of ADNID route on quality of life (138)
ADNID route / flight path trial is having a negative impact on quality of life / health and well-being / sleep (171)	ADNID route / flight path trial has increased noise in the area (125)
Criticism of the ADNID route / flight path trial (157)	Criticism of ADNID route (107)
Return to pre-ADNID trial flight path / routes / pre-February trial flight path (140)	Return to pre-ADNID trial flight path / routes / pre-February trial flight path (82)
Oppose / against any / all options for changes to RWY26 departures (120)	Negative impact of ADNID route on the residents of Horsham (62)

Responses from the public by email and post

Some 191 members of the public who responded by email or post made comments or suggestions about options put forward for RWY26 departures heading to the south. (75 of these respondents resided within the green area)

Many respondents made specific comments about one or more of the options, and these comments are included in this section.

Option A

There were 174 members of the public who provided comments on Option A. While one respondent said that this option was the “*least worst option*”, the vast majority of comments (from 143 respondents) were negative. Many of the negative or critical comments focussed on the ADNID trial including that the trial had a negative impact on quality of life (44); concerns that the trial has led to increased frequency of flights (21); and negative impact on unspecified local communities (14). A large number of specific areas/towns/villages were mentioned as being impacted by the trial. This included Rusper (24), Warnham (18), Horsham (16), and Slinfold (9). Please refer to the appended marked up code frame for more details on the areas mentioned.

There were 58 members of the public who called for the ADNID trial to cease, with the flight path to revert to how it was pre-February 2014.

Option B

Seven members of the public who responded by email or post provided comments on this option. One respondent said that Option B was the worst option, while two respondents said it was the best option, or the best compromise. Negative comments included concerns about impact on people/areas not previously over-flown (2); and impacts on quality of life (1).

Option C

There were 13 members of the public who provided comments on Option C. Four respondents provided support for Option C and three respondents opposed it. Positive comments included that it was the best compromise (5) and that it would have less impact on areas such as Rusper (3), Horsham (2) and Warnham (2).

Other comments and suggestions

Some 51 members of the public made other comments relating to all of the options. Again, as with comments on the specific options, most comments were negative or critical of the proposal. There were 32 comments opposing any changes to RWY26 departures. Other less frequently cited comments included concerns about the impact of noise (7); that all options would have negative impact on local people (4); and that options A/B/C were too similar (3).

A small number of suggestions were made. The main comment was that RWY26 departures should use the TIGER / DAGGA / WIZARD route (5). Other single suggestions included that Rusper and Capel should be avoided; and that more use of the BOGNA/HARDY-SFD should be made.

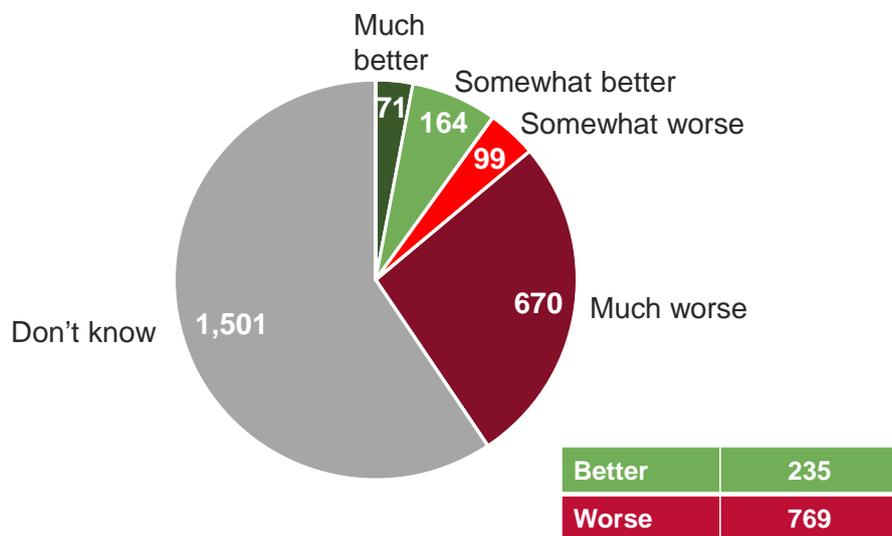
4.5 Members of the public: RWY08 Departures

Response form

There were 2,505 members of the public who answered **Question 2a** on the response form. The question asked respondents if they believed that the proposed realignment for RWY08 departures to the east/northeast of Gatwick Airport would be better or worse, compared to today's routes. Many of those who responded didn't know. Of those who did have a view, more members of the public believed the proposal would make things worse than would make things better.

Proposed realignment of Runway 08 departures

Q Compared with today's routes, do you believe the proposed realignment of RWY08 departures to the east/northeast of Gatwick Airport is better or worse?



Base: 2,505 responses from individuals between 23 May and 15 August 2015

Source: Ipsos MORI

Ipsos MORI
Public Affairs

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The map and chart below shows the answer to Question 2a for respondents with a postcode within the area most likely to be affected by the proposal.

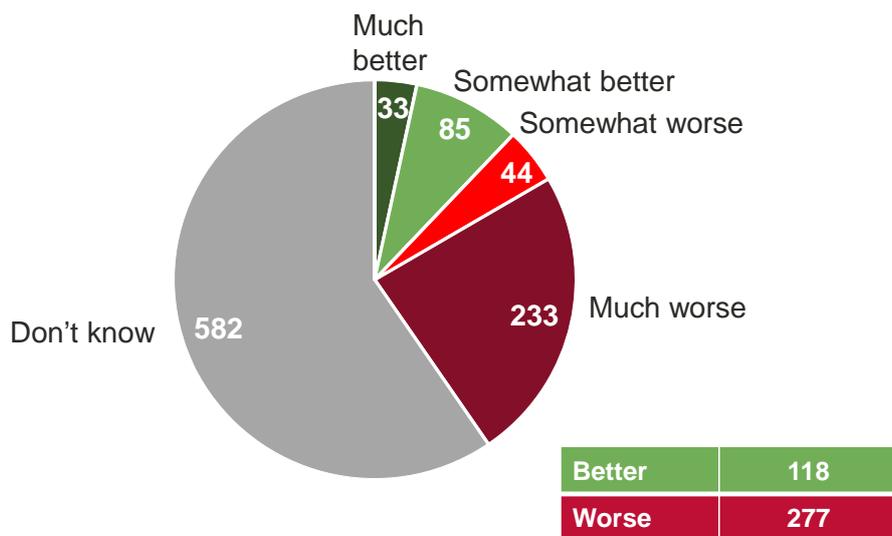
Map 4.2 – Geographical analysis of general public responses



The views of respondents in the blue area generally mirror those of all respondents – many did not know if the proposal would lead to improvements, or if it would make things worse. Of those who did have a view, more were critical than positive.

Proposed realignment of Runway 08 departures – Blue Area

Q Compared with today's routes, do you believe the proposed realignment of RWY08 departures to the east/northeast of Gatwick Airport is better or worse?



Base: 977 responses from individuals between 23 May and 15 August 2015

Source: Ipsos MORI

A total of 2,452 members of the public answered **Question 2b** on the response form which asked about the factors most important for GAL to consider when determining whether to realign the RWY08 departures to the east/northeast. Respondents were provided with a list of 14 factors, although they could also provide additional comments.

The table shows the top five concerns by frequency of response for all respondents, and for those who reside in the blue area as shown in Map 4.2.

Table 4.5 Top five noise concerns	
All respondents	Respondents who resided in the Blue Area only
Noise at night that disturbs sleep (1,513)	Noise in the day that disturbs sleep (794)
Noise in the day that impacts quality of life (1,502)	Noise in the day that affects quality of life (777)
Noise over populated areas in the day time (1,169)	Noise over AONBs / National Parks (648)
Potential noise impact on house prices (1,139)	Noise impacts on health (617)
Noise over the countryside in the day time (1,119)	Noise over the countryside in the day time (607)

Respondents were able to provide additional comments at Question 2b. Overall, there were 132 respondents who made general comments, including concerns about noise (42); impact on quality of life (24) and on air quality (23); concerns about the frequency and volume of flights (17); that all of the factors asked about at the question need to be considered (15); and concerns about flight paths (15).

Thirteen respondents made suggestions, including that there should be no increase in noise (5); that the airport should comply with government environmental policy (2); and flight paths should avoid populated areas (2).

There were 2,425 members of the public who answered **Question 2c** on the response form. This was the question which asked about what width NPR swathe would be most appropriate if GAL were to implement the proposed route. The table provides a breakdown of the responses from all respondents, and also those who specifically live in the blue area as depicted in Map 4.2.

Table 4.6 Width of NPR swathes - by area		
	All respondents	Respondents who resided in the Blue Area only
Base:	(2,425)	(960)
2 Kilometres	155	70
1.5 Kilometres	42	14
1 Kilometre	80	26
500 Metres	189	44
Other comments*	1,963	808
Don't know	475	168
None of these	761	122

*Respondents were allowed to include additional comments, which means that some respondents did so in addition to answering the tick-box, closed part of the question. It means that summing the total numbers will add to more than the base. A summary of additional comments is provided below.

Respondents were able to provide additional comments at Question 2c. Overall, comments included:

- **Specific suggestions about the width of NPR swathes:** a wide range of NPR widths were suggested from less than 500 metres (3) to greater than 20 kilometres (2). There were 16 comments that NPR swathes should be 3 kilometres as they are at present, and 10 comments that NPR swathes should be 5 kilometres.
- **More general suggestions about the width of NPR swathes:** including 49 comments that NPR swathes should be as wide as possible.
- **Concerns about the impact of aircraft:** including impact on quality of life (11); and noise impact (10).
- **Opposition to changes to flight paths:** including general concerns (4); and flight paths over AONBs and rural areas (4).
- **Alternative suggestions:** 30 respondents provided alternative suggestions, including that multiple routes are needed to spread disruption (13); flight paths should avoid populated areas (4); noise disruption should be reduced (3); and that noise disturbance should be spread over a wide area (2).

Those who provided a response at Question 2c were asked for their reasons for their choice at **Question 2d**. There were 1,163 members of the public who gave a reason or reasons for their choice. By frequency of response, answers to the tick-box or closed part of the question are shown in the table below.

Table 4.7 Reason for answer at Q2d		
	All respondents	Respondents who resided in the Blue Area only
<i>Base:</i>	(1,163)	(658)
NPR Swathes should indicate potential noise impact from over-flights of nearby area	402	169
NPR swathes affect house / property prices	387	134
NPR swathes should only cover areas that are likely to be directly over-flown	245	82
NPR swathes affect the local economy and investment in the area	174	81
NPR swathes affect tourism	146	84

Respondents were able to provide additional comments at Question 2d – comments included:

- **General concerns:** including comments about the impact on quality of life (19); impact on local communities (16); noise impacts (15); and concerns about people who bought property away from current flight paths who would be over-flown if proposals were implemented (8).
- **NPR swathes / flight paths:** including concerns about flight path trials (7).
- **Alternative suggestions:** including that multiple routes would be required to mitigate impact on one particular area (8); and that noise should be reduced (7).

Other comments / suggestions

There were 233 respondents who made other comments and suggestions about proposals for RWY08 departures to the east/north east. This included 84 respondents who resided in the blue area.

Eighteen respondents made positive or supportive comments about the proposals. Comments here included that the proposal was a good idea and/or would be welcomed (18); that fewer people would be affected (6); that there would be less noise disturbance than currently (3); and that the route would avoid the countryside and AONBs (2). In addition, 123 members of the public said that they would not be affected by the proposals.

Of those who provided negative comments, these included concerns about the impact of aircraft noise (12); general impact on local communities (9); and worries about impact on quality of life (6).

There were 17 respondents who made alternative suggestions, including that departures should be routed to the south-east (8); that departures should adhere to the NPR (2); and that departures should follow the flight path for longer before turning (2). Specific areas to be avoided included Tonbridge and Edenbridge.

The table shows the top five comments that were made by those who responded to **Question 2e**.

All respondents	Respondents who resided in the Blue Area only
I am not affected by RWY08 departures / departures heading East / North East / listen to views of those affected (123)	I am not affected by RWY08 departures / departures heading East / North East / listen to views of those affected (21)
Oppose / against RWY08 departure option heading East / North East (44)	Oppose / against RWY08 departure option heading East / North East (19)
Support RWY08 departures option / is a good idea / would be welcomed (18)	Support RWY08 departures option / is a good idea / would be welcomed (10)
Concerns about the impact of aircraft noise / flight paths for RWY08 departures (12)	RWY08 LAM departures should be routed south / east (8)
Concerns about the impact to the community for RWY08 departures (9)	Concerns about the impact of aircraft noise / flight paths for RWY08 departures (8)

Responses from the public by email and post

There were 31 members of the public who responded by email or post made comments or suggestions about options put forward for RWY08 departures heading to the east/north east. Of these respondents, 11 supported the proposals, nine opposed, and two said they would not be affected.

Positive comments included that the proposed changes would benefit the countryside (4); and that changes would reduce impact on elevated areas (2) and on Sevenoaks (2). There were also single comments that the changes would benefit Crockham Hill, Westerham, and historic buildings.

Negative comments included concerns that flight paths would be over Cowden (3); Penshurst (3); and general concerns about the impact of aircraft noise (2).

Five respondents made alternative suggestions including that LAM departure routes should be routed south or east (2); and individual comments that LAM departures should adhere to NPRs; that LAM departures route should be routed further north to avoid Lingfield; that departures should avoid using LAM; and that departures should follow DVR / BIG / CLN route for longer.

5 Options for arrivals – night time respite

5.1 Overview

This chapter provides a summary of responses to the consultation which addresses questions 3 and 4 on the response form, as well as unstructured responses via email and letter that make reference to issues relevant to these questions.

Question wording (Response Form)

Options for RWY26 arrivals – night time respite

Q3a.

Should Gatwick Airport Limited seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY26 could be implemented (as shown in Map 34 and Map 35)?

Q3b.

Which, if any, factors do you believe to be the most important for Gatwick Airport Ltd to consider when determining whether to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY26 could be implemented?

Q3c.

What, if any, comments or suggestions do you have about the proposals for Gatwick Airport Limited to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY26 could be implemented?

Options for RWY08 arrivals – night time respite

Q4a.

Should Gatwick Airport Limited seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY08 could be implemented (as shown in Map 38 and Map 39)?

Q4b.

Which, if any, factors do you believe to be the most important for Gatwick Airport Limited to consider when determining whether to seek changes to the current DfT noise abatement, so that the proposed night time arrival respite route for RWY08 could be implemented?

Q4c.

What, if any, comments or suggestions do you have about the proposals for Gatwick Airport Limited to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY08 could be implemented?

Summary of consultation responses

Stakeholder organisations

While some stakeholder organisations were in favour of GAL seeking changes to DfT noise abatement requirements, more were against. The main factors to take into account were noise at night which affects sleep; over the countryside at night; over populated areas; and over AONBs and populated areas.

Some stakeholders welcomed the proposal as it would lead to respite and a more equitable spread of aircraft noise. Others opposed because they were opposed to night flights altogether; it would allow aircraft to fly at lower altitudes for longer; and that some areas would receive no respite at all. Others suggested that the proposals should only be enacted as part of a package of multiple respite routes

Members of the public

More members of the public were opposed than in favour for GAL to seek changes to current DfT noise abatement requirements. Similar concerns about noise raised by stakeholder organisations were raised by members of the public, including impact at night that disturbs sleep, and over populated areas. Other concerns included impacts on quality of life; worries about increased pollution and air quality; and that some communities not currently over-flown would be if the changes were implemented.

5.2 Stakeholder organisations: Options for RWY26 arrivals

There were 39 stakeholder organisations that answered **Question 3a** on the response form that asked if GAL should seek changes to current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY26 could be implemented. Nine organisations thought that GAL should seek the changes (seven stated *yes - definitely*), whereas, 15 organisations were negative – all but one of these said *definitely not*. Nine organisations did not know.

A total of 39 stakeholder organisations answered **Question 3b** on the response form. This was a question which asked about factors most important for GAL to consider when determining whether to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY26 could be implemented. Respondents were presented with a choice of 14 tick-box responses on the response form. The top five answers by frequency of response were noise:

- at night that affects sleep (23 responses)
- over the countryside at night (19)
- over populated areas at night (19)
- over AONBs or National Parks (17)
- over the countryside in the day time (13)

Eight stakeholder organisations said they didn't know about which factors would be most important, and two said *none of these*.

Respondents could also provide additional comments via an "*other specify*" option at Question 3b. Seven stakeholder organisations provided additional comments. Keep Ruser Green and the Nevill Estate Company Ltd, based in Tunbridge Wells said that changes should only be considered if part of a package of multiple respite routes. Sevenoaks Weald Parish Council wanted night time flights between

midnight and 6am banned. Withyham Parish Council and Seraphina Mind Studio also raised noise concerns. Others mentioned the importance of respite.

There were 41 stakeholder organisations that answered **Question 3c** on the response form. This was the question which asked for comments or suggestions about the proposals for GAL to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY26 could be implemented.

Supportive comments

A number of stakeholder organisations welcomed the proposal to implement a night time respite route. Hever Parish Council supported the proposal as it would enable a more equitable spread of aircraft noise. Burstow Parish Council was also supportive and mentioned that “...with manufacturers producing quieter aircraft such as the A380 and B787 the noise environment will improve and, it is believed annoyance will not be such a factor when this regime is in full swing”.

Tunbridge Wells Borough Council said that the proposal probably should be implemented as it is essential to provide respite and changing the restrictions on the minimum distance an aircraft can join the approach could be beneficial particularly if the change improves the situation for people currently over-flown without placing additional burdens on those not currently over-flown. However, the Council added that it wished to see both day time and night time respite, and that more information on noise levels should be provided for arrivals, as was the case in a previous airspace consultation carried out in late autumn 2013.

Other stakeholder organisations, including Langton Green Village Society, and The Nevill Estate Company Ltd were supportive of the proposals provided that it could be proven that there would be a reduction in people adversely affected by aircraft noise. While Langton Green Village Society would prefer multi-path respite routes, the organisation said “...if it can be shown that by using a single respite path there would be a significant reduction in the people being adversely affected, we might be able to support a single respite route”.

Opposing comments – night flights

A few stakeholder organisations were against the proposal because they saw no need for it, or because they objected to increased air traffic. Others were opposed because they were opposed to night time flights altogether.

East Grinstead Town Council opposed night flights and said that the current 11:30pm to 6:00am restriction was not long enough to allow people to have restful sleep.

Withyham Parish Council was also opposed to night time flights for a number of reasons including that concentrated flight paths would swap from one part of the parish to another; that changes would allow aircraft to fly at lower altitude and therefore affect the population of Withyham; and, that the proposed night respite flight path would lie within Ashdown Forest Special Area of Conservation and Special Protection Area. The Council was therefore particularly concerned that little, if any, evidence had been gathered regarding the effects of the proposed changes to the nitrogen levels of the forest “the Council therefore cannot understand how Gatwick can consider seeking changes to noise abatement requirements without first considering where the arrivals will go and who will be affected”.

Westerham Town Council and Coneyhurst Concern Group were also opposed to night flights. In the latter's case, only emergency cases should be permissible at night.

Opposing comments – other factors

A number of stakeholder organisations provided negative comments about the proposals including that it would permit aircraft to fly at lower altitudes for longer, create more noise, and that respite would not be a solution.

Kent County Council was also opposed to the proposal as it would permit aircraft to fly lower than 3,000ft at 10 nautical miles from the airport on joining final approach *“therefore aircraft will also be very low over people's houses at night time that were not previously (or very rarely) flown over before – this is unacceptable to Kent County Council.”*

Other stakeholder organisations, including Cowden Parish Council said that respite would not be a solution and that proposals would lead to additional communities being blighted by aircraft.

GACC considered the benefits of respite were over-rated, and that while the procedure of using alternate routes may be welcome to some people, it won't be for others *“too often it appears to be promoted by the aviation industry as a cure-all for the extra noise cause by airport expansion plans. In the current consultation the only respite routes offered are on arrival routes and would see one route being used every day and another every night. We feel that those who would suffer every night flight would regard that as a funny sort of respite.”*

Rowhook and Clemsfold Amenity Society were concerned about current aircraft noise.

Penshurst Church of England Primary School was concerned about the proposed departure route being over Penshurst on days when RWY26 is not in operation. The school said that this would mean no respite for Penshurst which would be “manifestly unjust.”

Comments about multiple respite routes

Some stakeholders were opposed to a single respite route, and called for multiple respite routes to be implemented.

Leigh Parish Council opposed a single respite route, calling for multiple respite routes to be considered. The Council was also cautious about change in that *“any change must have as its objective a reduction in sleep being disturbed. The change to the noise abatement requirements should be that the fewest number should be affected. The requirement should be no increase in noise burden on any of those in the controlled area, this should be achieved by multiple narrow NPR across the controlled area and by the enforcement of aircraft flying at their maximum safe height until landing”.*

High Weald Council's Aviation Action Group (HWCAAG) requested that noise burden should not be increased as a result of the proposal. The organisation said that this *“...should be achieved by multiple narrow NPRs across the controlled area and by the enforcement of aircraft flying at their maximum safe height until landing.”* Other stakeholders including Chiddingstone Church of England School, and the Councillor for Penshurst, Fordcombe and Chiddingstone Ward (Sevenoaks) concurred with HWCAAG's comments.

A number of other organisations made the same or very similar comments in support of multiple respite routes, and made reference to previous consultation findings. These organisations included Peshurst Parish Council, Hever Castle Limited, Hever Residents Association, and Bidborough Parish Council.

Tonbridge Civic Society said that it believed there should not be a single respite path. However, if it were part of a multi-respite swathe it could be supported if it could be demonstrated that fewer people would experience noise nuisance.

Sevenoaks District Council said that *“a number of respite routes should be considered within the area currently affected by night time noise, and if feasible then consulted upon, before options that would involve disturbance to new communities are considered”*.

Other suggestions

Additional comments and suggestions were made about the proposal. These included that there should be no changes to current night time flight restrictions; that night flights should be minimised or banned due to their anti-social nature; that aircraft with higher levels of noise should be forced to make modifications to make them quieter, and that any changes made should be within existing NPRs.

Edenbridge Town Council suggested that if the aviation industry wants to provide practical solutions to the problem of night noise, it would need to introduce more effective noise abatement measures, including ruling out night time operations by the operators of noisier aircraft such as the A320 series whose characteristic whine is a major irritant. The Council also suggested that if aircraft do not fly higher, for longer, then night quotas should be reduced by voluntary means (as operative at Heathrow Airport), or by regulation if necessary.

Heathrow Airport Ltd said it was concerned that as Gatwick, Heathrow and Stansted are all designated for noise under the Civil Aviation Acts 1982-2006, that this consultation would only provide the viewpoint of Gatwick’s stakeholders. Heathrow Airport Ltd said that *“as NPR’s are one of the noise restrictions placed on the airport under section 78 of the Act, and as the final decision on the dimensions of an NPR rests with the DfT any new shape should also take account of the existing current track keeping performance at the airport and the purpose of the NPR. It is important that any new definition of an NPR takes adequate account of the views of the specific surrounding local communities which could be different for the 3 designated airports”*.

While Crawley Borough Council welcomed the proposal for respite, it said that the proposed swathes would be too wide covering areas previously less frequently over-flown, and that they should be narrower. The Council also mentioned that *“...there is unreasonable focus on the various effects respite would have on Hever, giving the impression that respite zones are designed specifically to benefit Hever”*.

Sevenoaks District Council suggested that restrictions and meaningful penalties should be introduced to ensure that aircraft approach Gatwick Airport at their maximum safe height at all times of the day. The Council also requested an explanation as to why a number of day time respite routes within the existing affected areas (as shown on maps 34 and 35) could not be introduced if it is going to be possible to provide more concentrated arrivals routes in the future.

Other suggestions included that there should be a no-fly zone over AONBs, and urban areas including Groomsbridge, Speldhurst and Peshurst.

5.3 Stakeholder organisations: Options for RWY08 arrivals

There were 38 stakeholder organisations that answered **Question 4a** on the response form which asked if GAL should seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY08 could be implemented. Eight stakeholder organisations were in support of the proposal, and 16 were opposed. A further 14 organisations didn't know.

A total of 33 stakeholder organisations answered **Question 4b** on the response form. This question asked about factors most important for GAL to consider when determining whether to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY08 could be implemented. Respondents were presented with a choice of 14 tick-box responses on the response form. The top five answers by frequency of response were:

- noise at night that affects sleep (22 responses)
- noise over populated areas at night (22)
- noise over the countryside at night (17)
- noise impact on house prices (15)
- noise over AONBs or National Parks (14)

Seven stakeholder organisations said they didn't know about which factors would be most important.

Respondents could also provide additional comments via an "other specify" option at Question 4b. Eight stakeholder organisations provided additional comments - five of these organisations said that the proposals did not affect them. Sevenoaks Weald Parish Council said flights should cease at night. Farlington School Trust Ltd said that as they were a residential school, and community, they would be concerned about noise during the day and at night.

There were 38 stakeholder organisations that answered **Question 4c** on the response form which asked for comments or suggestions about the proposals for GAL to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY08 could be implemented.

Supportive comments

A few stakeholder organisations provided comments in support of the proposal. Crawley Borough Council said the Council was supportive because no new population would be exposed to over-flights. Loxwood Parish Council agreed with the proposal to enable a night time respite arrival route for RWY08 to enable respite. However, it added that the same night time restrictions that apply at Heathrow Airport should also apply at Gatwick as it is known that disturbed sleep is detrimental to health. Chichester District Council also supported the proposal so that night time respite route could be implemented.

Opposing comments

Several stakeholder organisations were opposed to the proposal for similar reasons to those that were opposed to the proposal to implement a night time arrival respite route for RWY26. Sevenoaks Weald Parish Council and East Grinstead Town Council were opposed to the proposals and requested a minimum no-fly night time restrictions over and above current limits (from 11:30pm to 6:00am).

Others including Westerham Town Council said that they did not understand the need to change this requirement to implement the respite routes. And some organisations including Godstone Village Association, The Trustees of the Frontagers, and Hildenborough Parish Council opposed the proposal.

Other comments and suggestions

Several stakeholder organisations made additional comments and suggestions. These included that any changes made should be within existing NPRs; that existing flight paths should be retained; and that aircraft engine noise could be reduced if airspeed was reduced, which would not have implications for safety. Specific suggestions included:

- Hever Castle Ltd was concerned about the impact the proposals could have in terms of reduced visitors given aircraft blight. It suggested that increased over-flight would risk the castle's ongoing viability as well as other attractions in places such as Penshurst and Chiddingstone *"...collectively we must get about 500,000 visitors a year and their demise would result in a huge hole in the local economy and almost more importantly the loss of an internationally important part of our history that is currently very accessible. Further consideration needs to be given to planes avoiding these heritage attractions as particularly in Hever Castle's case if it were to have a reputation for airplane noise I have no doubt that would ultimately result in its closure."*
- Heathrow Airport Ltd repeated its suggestion made about proposals for night time arrivals to RWY26 *"It is important that any new definition of an NPR takes adequate account of the views of the specific surrounding local communities which could be different for the 3 designated airports. HAL is already engaging the CAA and DfT on this subject to ensure our views, and those of our stakeholders are made clear"*.
- Tunbridge Wells Borough Council said it would not be affected, it assumed that residents under the flight path would have similar requirements to their own residents. The Council said that the information given was not fully comprehensive, and as such, their comments are based upon the information available which did not include data tables of the sort included in the departures sections of the consultation document. The Council suggested that one of the fundamental problems of the consultation was that it overly relies on older metrics that did not adequately reflect growing community intolerance to aircraft noise.

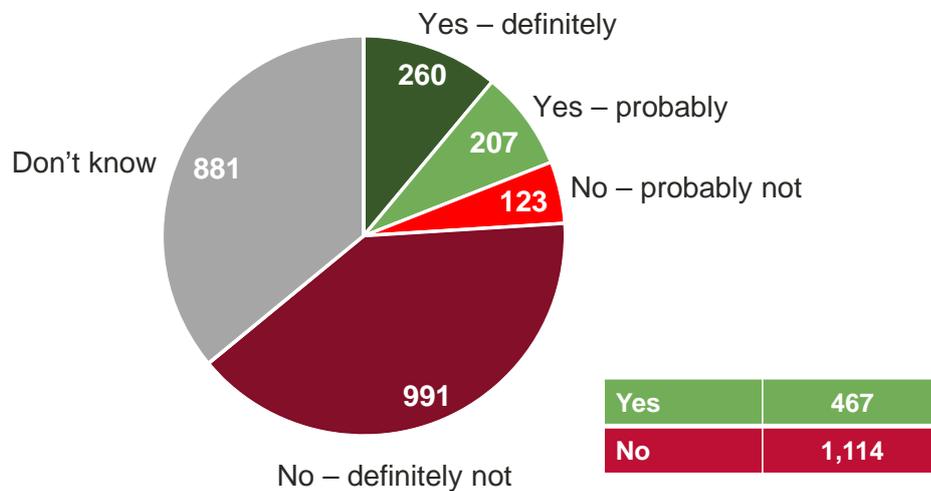
5.4 Members of the public: Options for RWY26 arrivals

Response form

There were 2,462 members of the public who answered **Question 3a** on the response form. This was the question which asked if GAL should seek changes to current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY26 could be implemented. Many respondents didn't know. Of respondents who did have a view, the balance of opinion was that GAL should not seek the changes.

Changes to noise abatement requirements for Runway 26

Q Should Gatwick Airport Limited seek changes to the current DfT noise abatement requirements, so that the proposed night-time arrival respite route for RWY26 could be implemented?



Base: 2,462 responses from individuals between 23 May and 15 August 2015

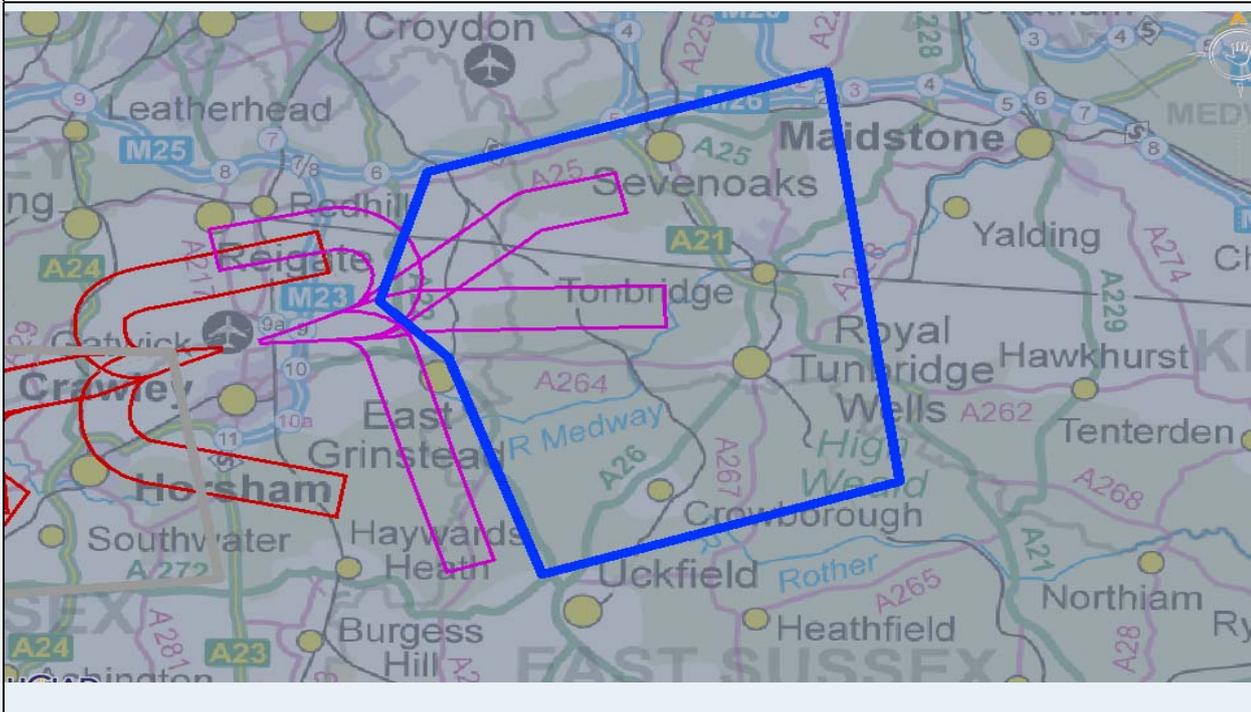
Source: Ipsos MORI

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The map and chart on the next page shows the answer to Question 3a for respondents with a postcode within the area most likely to be affected by the proposal.

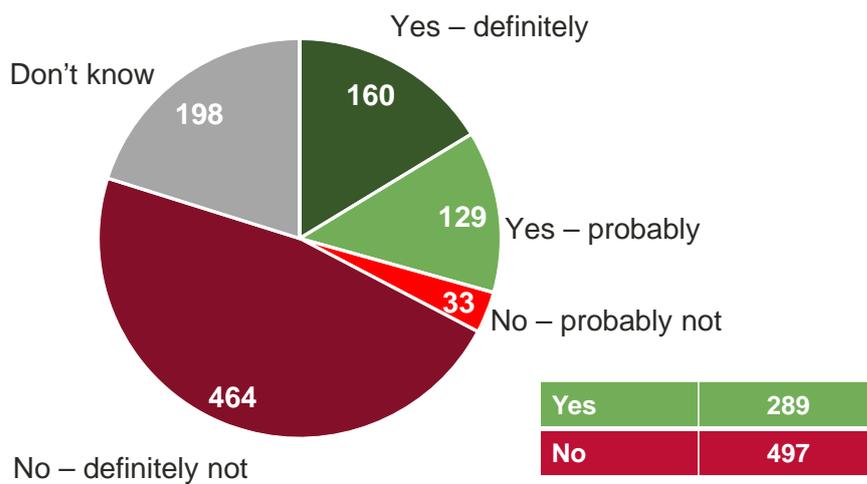
Map 5.1 – Geographical analysis of general public responses



As with all respondents, those who resided in the blue area were also more likely to be against, than for the proposal.

Changes to noise abatement requirements for Runway 26 – Blue Area

Q Should Gatwick Airport Limited seek changes to the current DfT noise abatement requirements, so that the proposed night-time arrival respite route for RWY26 could be implemented?



Base: 984 responses from individuals between 23 May and 15 August 2015

Source: Ipsos MORI

A total of 2,430 members of the public answered **Question 3b** on the response form which asked about factors most important for GAL to consider when determining whether to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY26 could be implemented. Respondents were provided with a list of 14 factors, although they could also provide additional comments. The table shows the top five concerns by frequency of response.

All respondents	Respondents who resided in the Blue Area only
<i>Noise at night that disturbs sleep (1,673)</i>	<i>Noise at night that disturbs sleep (807)</i>
<i>Noise over populated areas at night (1,362)</i>	<i>Noise over populated areas at night (653)</i>
<i>Noise over the countryside at night (1,156)</i>	<i>Noise impacts on health (605)</i>
<i>Noise impacts on health (1,155)</i>	<i>Noise over the countryside at night (599)</i>
<i>Noise in the day that impacts my quality of life (1,047)</i>	<i>Noise in the day that affects quality of life (423)</i>

Respondents were able to provide additional comments at Question 3b. Of these who provided additional comments, 142 members of the public made general comments, including concerns about additional aircraft noise (46); concerns about early morning or night flights (35); that all factors need to be considered (11); and concerns about the frequency and volume of flights (10).

Some 56 respondents commented upon the direct impact of the proposals. A wide range of comments were made, including concerns about quality of life issues (23); pollution and air quality (13); about impact on areas not currently over-flown (9); and impact on local people and communities (6).

Other comments included opposition to changes to flight paths (28); specific opposition to night time or early morning flights (25); and support for wide/broad NPRs to disperse noise disturbance (14). A total of 27 members of the public specifically mentioned that the proposal would not affect them.

There were 18 members of the public who made alternative suggestions. These included that noise should be reduced (4); that aircraft should avoid residential areas (4); and that aircraft should be quieter (3).

Additional comments and suggestions

There were 209 members of the public who answered **Question 3c** on the response form. This was a question that asked about proposals for GAL to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY26 could be implemented.

Overall, there were 48 respondents who said they were not affected by the proposal. Other comments and suggestions included 33 respondents who said they opposed RYW26 arrivals proposal, and a further 19 who specifically said they opposed the proposal for night time respite for RWY26. On the other hand, 18 members of the public said they supported the proposals for night time respite, and four said they supported RWY26 arrivals options without specifying night time.

Overall, five members of the public provided conditional support for the proposals provided noise would not be increased and 76 members of the public provided negative or critical comments. Comments included concerns that the arrivals swathe would increase which would impact those directly beneath (15); and that proposals would lead to impacts in unspecified areas (11). A number of different areas were mentioned as being negatively impacted by the proposals, including Peshurst (9), Fordcombe (5), Langton (5), and Hever or Hever Castle (4).

A total of 44 members of the public made suggestions about the proposal. This included many comments that day time and/or night time respite should be given to specific areas, including Hever, Peshurst and Tonbridge. There were also 23 comments suggesting that RWY26 arrivals should be spread or dispersed as widely as possible so that impact is not concentrated in one particular area.

The table shows the top five comments that were made by those who responded to **Question 3c**.

All respondents	Respondents who resided in the Blue Area only
I am not affected by RWY26 arrivals / listen to views of those affected (48)	Support – Proposed RWY26 arrivals night time respite options (15)
Oppose - Proposed RWY26 arrivals options (33)	Oppose - Proposed RWY26 arrivals options (14)
RWY26 arrivals should be spread as widely as possible / to disperse / not concentrate negative impact (23)	Concerns about the impact of aircraft noise / flight paths for RWY26 arrivals (13)
Oppose - Proposed RWY26 arrivals night time respite options (19)	Proposed narrow RWY26 arrivals swathe will increase / concentrate impacts for those directly beneath / on the ground (13)
Concerns about the impact of aircraft noise / flight paths for RWY26 arrivals (19)	Oppose - Proposed RWY26 arrivals night time respite options (9)

Email and post

There were 50 members of the public who responded by email or post who made comments or suggestions on the proposal for GAL to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival route for RWY26 could be implemented. A total of 16 respondents said they opposed the RWY26 arrivals option, and a further two respondents specifically said they opposed the option for the night time arrival route. Just two respondents said they supported the proposals, one of whom said that the proposal would benefit Hever.

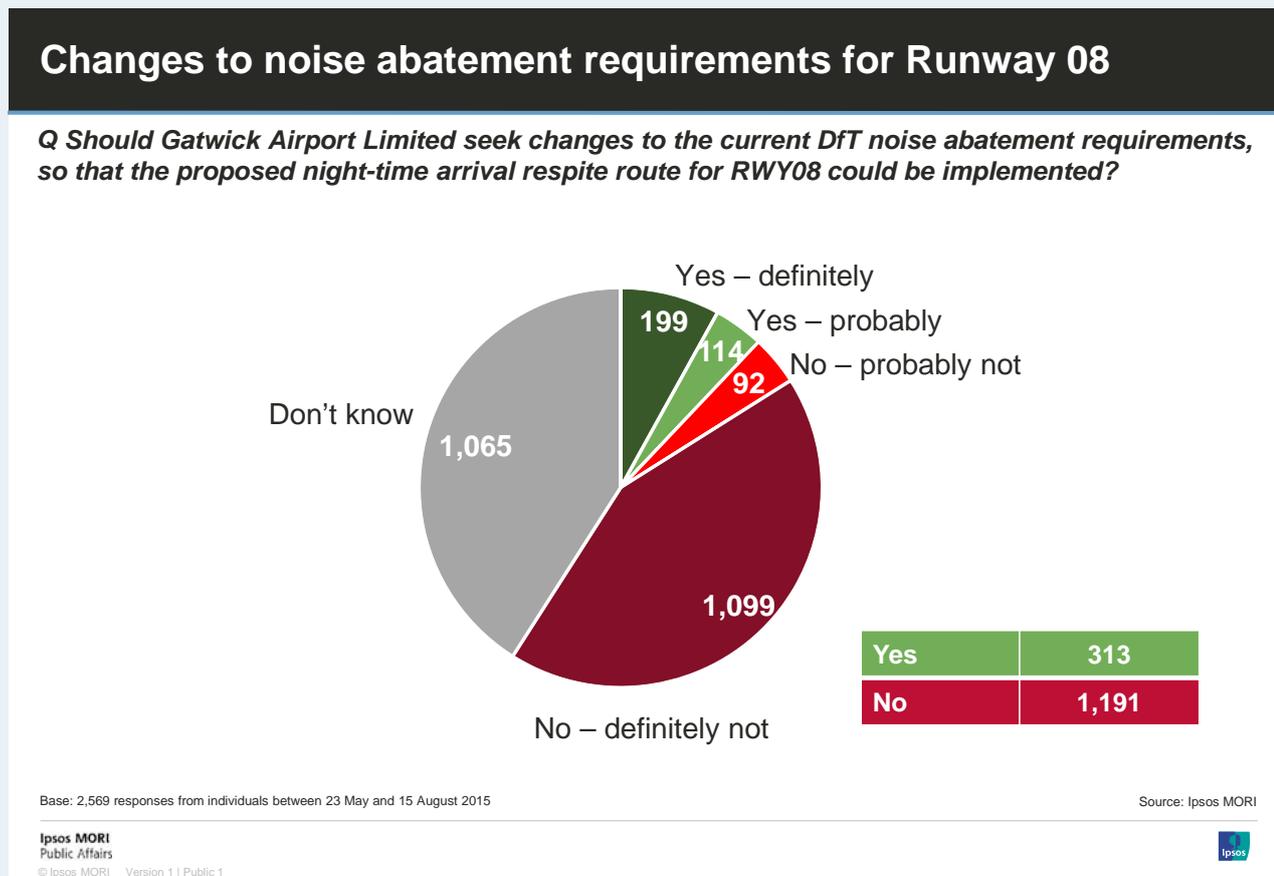
Overall – there were 39 negative comments made about the proposal. The main comments here were that the proposal would concentrate impact on those underneath given narrow swathes (15); that proposals would negatively impact Langton Green (8); general concerns about noise (7); and Groombridge would be affected (5).

Fourteen respondents made alternative suggestions, including that arrivals should be spread as widely as possible (6); that flight paths should be moved further west (5); that arrivals should have a steeper approach (2); and that arrivals should avoid Crowborough (2).

5.5 Members of the public: Options for RWY08 arrivals

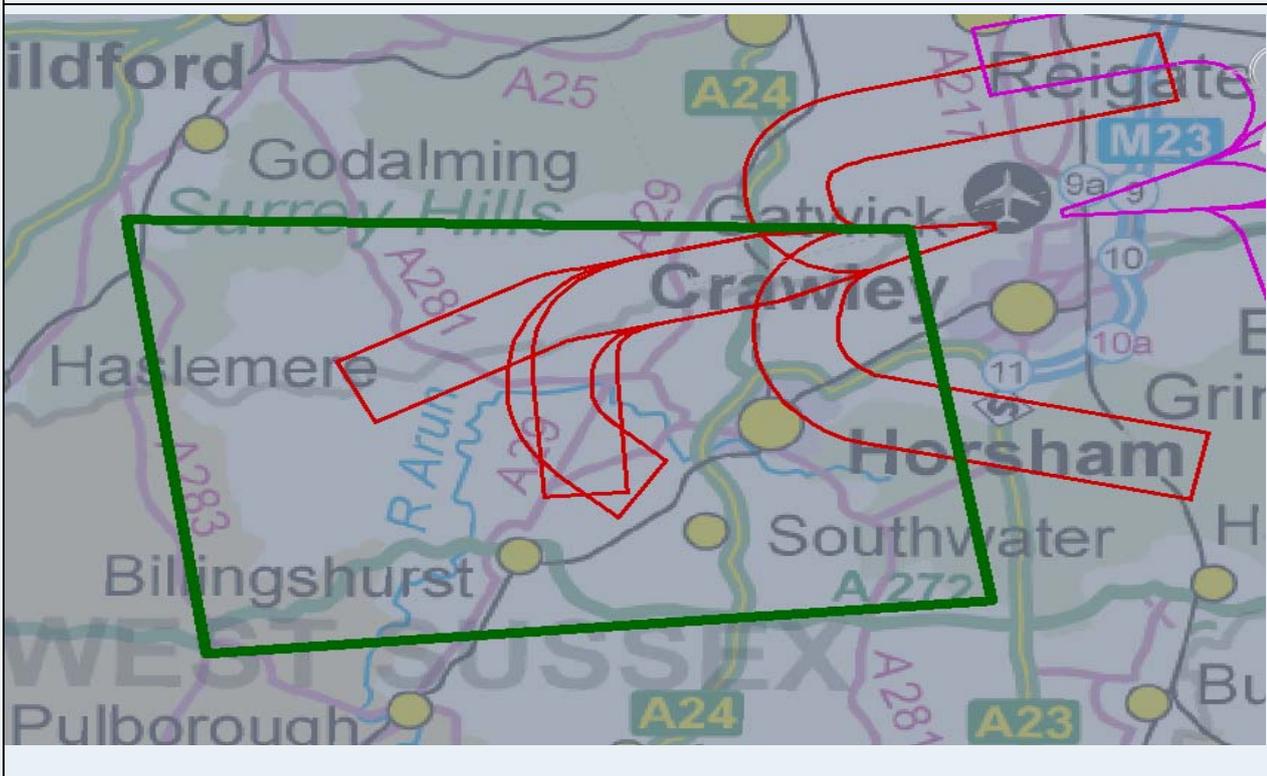
Response form

There were 2,569 members of the public who answered **Question 4a** on the response form which asked if GAL should seek changes to current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY08 could be implemented. Many respondents did not know if GAL should seek the changes or not. Of those who did have a view, more were against, than for the proposal.



The map and chart on the next page shows the answer to Question 3a for respondents with a postcode within the area most likely to be affected by the proposal.

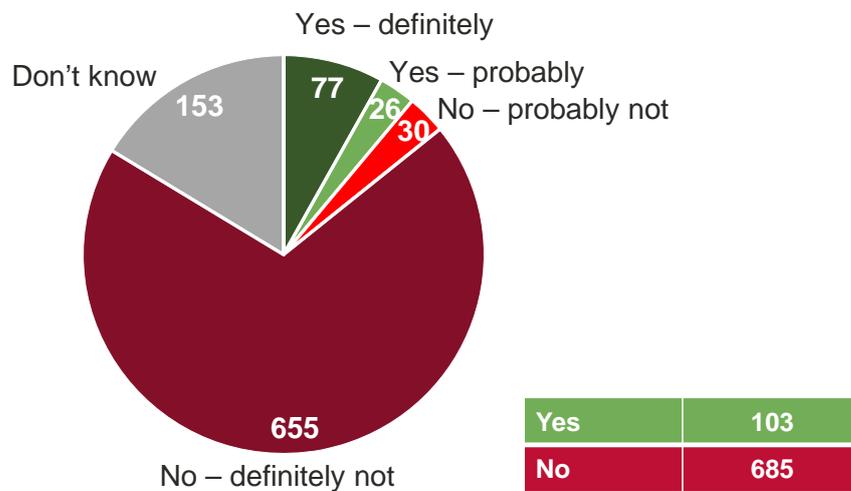
Map 5.2 – Geographical analysis of general public responses



More respondents in the green area were against, than for the proposal. As a proportion of those who responded, respondents in the green area were more likely to have a view than to not know.

Changes to noise abatement requirements for Runway 08 – Green Area

Q Should Gatwick Airport Limited seek changes to the current DfT noise abatement requirements, so that the proposed night-time arrival respite route for RWY08 could be implemented?



Base: 941 responses from individuals between 23 May and 15 August 2015

Source: Ipsos MORI

A total of 2,560 members of the public answered **Question 4b** on the response form. This asked about the factors most important for GAL to consider when determining whether to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY08 could be implemented. Respondents were provided with a list of 14 factors to consider, although they could also provide additional comments. The top five factors are shown in the table below.

All respondents	Respondents who resided in the Green Area only
<i>Noise at night that disturbs sleep (1,660)</i>	<i>Noise at night that disturbs sleep (776)</i>
<i>Noise over populated areas at night (1,365)</i>	<i>Potential impacts on house prices (675)</i>
<i>Potential impacts on house prices (1,280)</i>	<i>Noise over populated areas at night (669)</i>
<i>Noise impacts my health (1,240)</i>	<i>Noise impacts my health (645)</i>
<i>Noise in the day that affects quality of life (996)</i>	<i>Noise in the day that affects quality of life (372)</i>

Respondents were able to provide additional comments at Question 4b. Of these who provided additional comments, 85 members of the public made general comments, including concerns about impact as a result of the proposals (39), and specifically, additional aircraft noise (35). Other specific comments about impact included concerns about air quality and emissions (14); and about impacts to quality of life (13).

Fifteen members of the public made comments about respite, with the main comment being that dispersal of noise over a wide an area as possible would reduce noise disturbance, and would be fairer (9).

Of the 68 members of the public who were critical of the proposal, the main comments were in opposition to night flights and/or early morning flights (26); and opposition to any changes to flight paths and NPRs (25). Nine members of the public made suggestions about the proposal including that noise should be reduced (3); and that the frequency/volume of flights should be reduced (2). A total of 32 members of the public said that they would not be affected by the proposals.

Additional comments and suggestions

There were 213 members of the public who answered **Question 4c** on the response form. This was a question that asked for any comments of suggestions respondents had about proposals for GAL to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY08 could be implemented.

There were 39 respondents who opposed any changes to the current noise abatement requirements; 26 respondents opposed RYW08 arrivals options; and 14 respondents specifically mentioned that they were opposed to night time respite options.

Some respondents said they supported the proposals including support for night time respite options (14); support for changes to the noise abatement order (9); and support for the proposed arrivals options (6).

A total of 53 members of the public provided negative comments about the proposal. The main comments were concerns about the impact of aircraft noise (15); about quality of life impacts (11); that the proposal isn't needed (8); and that the proposal is inadequate, and won't make things better for local people (8).

There were 23 members of the public who made alternative suggestions relating to the proposal for RWY08. Suggestions included that arrivals should be spread out or dispersed as widely as possible (8); that RWY08 arrivals should avoid populated/residential areas (7); and that arrivals should have a steeper approach (5).

A total of 61 respondents said that they would not be affected by the proposal.

The table shows the top five comments by area that were made by those who responded to **Question 4c**.

All respondents	Respondents who resided in the Green Area only
I am not affected by RWY08 arrivals / listen to views of those affected (61)	I am not affected by RWY08 arrivals / listen to views of those affected (14)
Oppose - Changes to current DfT noise abatement requirements (39)	Oppose - Changes to current DfT noise abatement requirements (11)
Oppose - Proposed RWY08 arrivals options (26)	Proposed RWY08 arrivals flight paths / NPRs are unnecessary / not needed (8)
Concerns about the impact of aircraft noise / flight paths from RWY08 arrivals (15)	Oppose - Proposed RWY08 arrivals options (7)
Support - Proposed RWY08 arrivals night time respite options (14)	Proposed RWY08 arrivals will negatively impact quality of life (6)

Email and post

There were 38 members of the public who provided comments or made suggestions about proposals for GAL to seek changes to the current DfT noise abatement requirements, so that the proposed night time arrival respite route for RWY08 could be implemented. As with views on other proposals, more respondents opposed than supported the proposal. One respondent mentioned Penshurst Parish Council's support for multi-respite paths, and two respondents mentioned Tunbridge Wells Borough Council's support for multiple respite paths.

The main negative comments were concerns that more people would be negatively impacted or affected by the proposal (5); general concerns about the impact of aircraft noise (2); about consequences for quality of life (2); and concerns about the impact of the proposal on Loxwood.

6 Proposed realignment and reduction of existing NPR swathes

6.1 Overview

This chapter provides a summary of responses to the consultation which addresses questions five, six, seven, and eight on the response form, as well as unstructured responses via email and letter that make reference to issues relevant to the reduction and realignment of NPR swathes for departures from Gatwick Airport.

Question wording (Response Form)

Realignment and reduction of existing NPR swathes of RWY26 and RWY08 departures

Q5a.

Should Gatwick Airport Limited implement shortened NPRs to take account of the observed climb performance of the flights at Gatwick Airport?

Q5b.

Which, if any, factors do you believe to be the most important for Gatwick Airport Limited to consider with respect to re-centring and narrowing published NPRs to take into account aircraft performance on the modern PBN routes?

Q5c.

What, if any, comments or suggestions do you have about the proposals for Gatwick Airport Limited to consider re-centring and narrowing published NPRs to take into account aircraft performance on the modern PBN routes (please provide any views you have on what the optimal width for NPR swathes should be)?

Q6a.

Should Gatwick Airport Limited implement shortened NPRs to take account of the observed climb performance of the flights at Gatwick Airport?

Q6b.

Which, if any, factors do you believe to be the most important for Gatwick Airport Limited to consider when determining whether to implement shortened NPRs to take account of the observed climb performance?

Q6c.

What, if any, comments or suggestions do you have about the proposals for Gatwick Airport Limited to consider when determining whether to implement shortened NPRs to take account of the observed climb performance of the flights at Gatwick Airport?

Q7a.

The existing PBN route for RWY26 DVR/CLN/LAM departures means that aircraft fly outside the NPR. Should Gatwick Airport Limited re-centre and narrow the published NPR to correct this anomaly?

Q7b.

Which, if any, factors do you believe to be the most important for Gatwick Airport to consider, with respect to correcting the published NPR for the RWY26 DVR/CLN/LAM route, so that it captures where aircraft actually fly?

Q7c.

What, if any, comments or suggestions do you have about the proposals for Gatwick Airport Limited to consider, with respect to correcting the published NPR for the RWY26 DVR/CLN/LAM route, so that it captures where aircraft actually fly?

Q8a.

Should Gatwick Airport Limited consider NPR swathes with variable widths, dependant on sharpness of turns on each route, as a more accurate portrayal of where aircraft actually overfly?

Q8b.

Which, if any, factors do you believe to be the most important for Gatwick Airport Limited when considering NPR swathes with variable widths, dependant on sharpness of turns on each route, as a more accurate portrayal of where aircraft actually overfly?

Q8c.

What, if any, comments or suggestions do you have about whether Gatwick Airport Limited should consider NPR swathes with variable widths as a more accurate portrayal of where aircraft actually overfly?

Summary of consultation responses

Stakeholder organisations

For each of the closed questions in this section, the majority of respondents indicated that they opposed the proposals as they understood them, and for each the reasoning given was consistent – that they believed NPR swathes should indicate potential noise impact from over-flights of nearby areas; that NPR swathes affect house prices; and that NPR swathes should only cover areas that are likely to be directly over-flown.

In relation specifically to re-centring and narrowing NPRs, a key concern was the impact that this might have on the quality of life of those living directly beneath a narrowed NPR.

With regard to shortened NPRs a major concern was that not all aircraft would be capable of reaching the required height in a shorter distance, potentially leaving them able to fly in a dispersed fashion at a relatively low altitude while they continue to climb.

Regarding the re-centring and narrowing of the Performance Based Navigation (PBN) route NPR, some stakeholder organisations considered that there was merit in adjusting NPRs to accurately reflect flight paths, others said it was undesirable to adjust it to regularise 'rogue-flying'.

When reflecting on variable width NPR swathes concerns included that variable widths should only be considered if there was a genuine operational requirement and that variable widths would undermine the purpose of NPRs. A number said that they should only be located within existing NPR swathes.

Members of the public

For Questions 5 and 6 of the closed questions in this section the majority of respondents indicated that they opposed the proposals. For Question 7 the biggest single group was support, and for Question 8 there was an almost equal balance between support and opposition. For all questions the reasoning given was consistent – that NPR swathes should indicate potential noise impact from over-flights of nearby areas, that NPR swathes affect house prices and that NPR swathes should only cover areas that are likely to be directly over-flown.

In relation to re-centring and narrowing NPRs the primary concerns were noise, that it would be negative impacts would be intensified on those living beneath and have a negative effect on their quality of life.

For shortened NPRs there was a division between those who said shorter NPRs would reduce noise by getting aircraft to higher altitudes quicker and those who felt that by climbing more quickly aircraft would make a greater noise.

Regarding the re-centring and narrowing of the PBN route NPR, some respondents said that it would be beneficial for NPRs to give an accurate depiction of the routes actually flown by aircraft. On the other hand there were concerns that it might impose noise impacts on people previously unaffected, and increase them for others.

Again, opinion was divided in relation to variable width NPR swathes. Some felt it would be positive if NPRs were an accurate representation of routes, others were concerned that it might increase uncertainty for people as to where aircraft fly, and possibly spread negative impacts to a greater number of people.

6.2 Stakeholder organisations

6.2.1 Re-centre and narrow NPRs

Of the stakeholder organisations that used the response form to respond to the consultation, 39 answered **Question 5a** regarding re-centering and narrowing the published NPRs. Most of the stakeholder organisations were opposed to the proposal, with 22 saying definitely or probably not. Stakeholders responded as follows:

- Yes – definitely (5 responses)
- Yes – probably (6)
- No – probably not (3)
- No – definitely not (19)
- Don't know (6)

Of the stakeholder organisations that used the response form to respond to the consultation, 33 answered **Question 5b**. This was the question which asked which, if any factors respondents believed to be the most important for GAL to consider when re-centring and narrowing published NPRs. The factors raised by frequency of response were:

- NPR swathes should indicate potential noise impact from over-flights of nearby areas (19 responses)
- NPR swathes affect house prices (15)
- NPR swathes should only cover areas that are likely to be directly over-flown (11)
- NPR swathes affect tourism (9)
- NPR swathes affect the local economy/investment in the area (8)
- None of these (3)
- Don't know (4)

Of the stakeholder organisations that used the response form to respond to the consultation, nine suggested factors additional to those provided in Question 5b. Nutfield Conservation Society stated that it would be advantageous to utilise modern technology to limit flights to a narrower area. North Horsham Parish Council believed that any changes to NPRs were likely to have a negative impact and Seraphina Mind Studio said that the proposals would be severely detrimental to the quality of life of those living beneath a revised NPR. The effect on quality of life was echoed by Park Lane Reigate Residents' Association. Both Rudgwick Parish Council and a Parish Councillor for Sevenoaks Weald Parish Council

preferred NPR swathes to be widened rather than narrowed, in order for the negative impacts to be spread between a greater number of people and to enable those affected some periods of respite. Farlington School Trust Ltd was concerned about noise during both day and night and Chiddingstone Castle stated simply that respite and enforcement should be taken into consideration.

A number of stakeholder organisations provided comments or suggestions on the proposals to consider re-centering and narrowing published NPRs. These stakeholder organisations responded by email or post and made comments directly relating to this issue. No stakeholder organisations chose to answer **Question 5c** of the response form. Of the organisations that did make comments on the proposals, many were critical of the proposals with stakeholders such as High Broom Lane Road Association, Hildenborough Parish Council and Warnham Parish Council expressed their clear opposition to the proposals. Others such as Westerham Town Council and Nutfield Conservation Society expressed their support for narrowed NPR swathes.

Rowhook and Clemsfold Amenity Society stated that any noise increase will have a negative impact. Chichester District Council suggested that they would be amenable to the proposals if PBN routes lead to environmental benefits and the use of modern, quieter aircraft. Similarly Leigh Parish Council stated that they would be supportive of narrowed NPRs only if there was no increase in noise for anyone. Hever Parish Council would prefer that NPRs gave an accurate indication of areas affected by aircraft noise, and said that narrowing swathes would give a false impression of noise impact.

Many stakeholders expressed concern that narrowed NPRs would have significant impacts on some members of the community. While it was acknowledged that some people would benefit there was concern that for those worst affected the negative effect could be significant. CAGNE was concerned about the impact of those living directly beneath narrowed NPRs, suggesting that they would have extremely negative impacts on those people's lives. Similarly Edenbridge Town Council was concerned about the potential impact of narrower swathes on people's lives, particularly as it was thought narrower NPRs would also limit the scope for respite. Gatwick Area Conservation Group also referred to negative impacts on resident's lives, referring to the recent trial which they said had seen a 'continuous stream of aircraft' pass over people's homes. They preferred the historic situation which they felt spread flights over a wider area and which they stated many people found tolerable.

Bidborough Parish Council and Penshurst Parish Council thought that NPR swathes should give an accurate representation of impacts experienced by those living beneath them. Langton Green Village Society, Tonbridge Civic Society and Nevill Estate Company Ltd said that impacts on populations should be a key factor in determining the width of an NPR swathe. Stakeholders including Sevenoaks District Council said that any decision needs to balance making more efficient use of runways and airspace with consideration for the impacts on local people. Tandridge District Council suggested that consideration should be given to compensation and mitigation for those who would be negatively impacted by the proposal. Several stakeholders including Tunbridge Wells Borough Council suggested that there has been insufficient data provided to truly determine the size of the populations affected and the level of respective noise impact. Alford Parish Council suggested that there was insufficient research to justify narrowing NPRs for environmental and social reasons. Coneyhurst Concern Group said they were primarily concerned about increased noise over rural areas rather than urban ones.

Park Lane Reigate Residents' Association noted that a reduced swathe could be beneficial to people, but only if it is routed away from residential areas. Similarly, Warwick Park Area Residents' Association (an organisation claiming to represent residents of the southern area of Tunbridge Wells) advocated routing

away from concentrations of population, in particular Tunbridge Wells, to reduce noise, pollution and safety impacts.

East Grinstead Town Council indicated that they supported narrowed NPRs in order to reduce the impact of 'rogue flying' and to minimise the number of people who experience disruption from aircraft noise. Cowden Parish Council and easyJet advocated utilising modern technology for precision navigation and quieter aircraft engines. High Weald AONB Unit considered the indicated routes to be a satisfactory 'best fit' considering the various sensitive locations in the area and was supportive of narrower NPRs on the condition that respite routes are provided.

A Parish Councillor for Sevenoaks Weald was concerned that narrowing swathes would limit the opportunity for respite routes and advocated no reduction in NPRs in order to give as broad a scope for respite as possible.

Some stakeholders provided alternative ideas including;

- Enforcing adherence to existing NPR swathes (Brockham Park Residents Management Committee, High Weald Council's Aviation Group)
- Multiple narrow NPRs within a broad area to spread impacts and provide respite (Chiddingstone Castle, Chiddingstone Church of England School, Chiddingstone Parish Council, Kent County Council, Withyham Parish Council, Hever Residents Association, Leigh Parish Council)
- Make swathes as wide as possible (Rudgwick Parish Council)
- Respite (unspecified) (High Weald Council's Aviation Group)

6.2.1 Shortened NPRs

Of the stakeholder organisations that used the response form to respond to the consultation, 41 answered **Question 6a** which asked whether shortened NPRs should be implemented. Most of the stakeholder organisations were opposed to the proposal, with 19 saying either definitely or probably not. Stakeholders responded as follows:

- Yes – definitely (8 responses)
- Yes – probably (6)
- No – probably not (7)
- No – definitely not (12)
- Don't know (8)

Of the stakeholder organisations that used the response form to respond to the consultation, 34 answered **Question 6b** which asked which, if any factors respondents believed to be the most important for GAL to consider when determining whether to implement shortened NPRs. The factors raised by frequency of response were:

- NPR swathes affect house prices (17 responses)
- NPR swathes should indicate potential noise impact from over-flights of nearby areas (16)
- NPR swathes should only cover areas that are likely to be directly over-flown (13)
- NPR swathes affect the local economy/investment in the area (10)
- NPR swathes affect tourism (10)
- None of these (3)

- Don't know (5)

Of the stakeholder organisations that used the response form to respond to the consultation, 10 stakeholder organisations suggested factors additional to those provided in Question 6b. These included The Nevill Estate Company Ltd, Langton Green Village Society and Chiddingstone Castle which state that they believe that NPR swathes should serve as reliable indicators of potential noise experienced on the ground. North Horsham Parish Council was concerned that shortened NPR swathes might lead to nearby residents being adversely affected. Similarly Betchworth Parish Council said that shortened NPRs might make flight paths less predictable and therefore lead to more residents in Betchworth being over-flown. A Parish Councillor for Sevenoaks Weald suggested that swathes should be increased in order to give respite to local people. Nutfield Conservation Society was sceptical that long-haul aircraft would be able to climb to the required altitude within the length of the shorter NPR. Farlington School Trust Ltd was concerned about noise both during the day and at night. Park Lane Reigate Residents' Association was concerned with the impact on quality of life.

A number of stakeholder organisations provided comments at **Question 6c** on the response form or via emails and letters that made reference to shortened NPRs. Of the organisations that did make comments on the proposals, several explicitly stated their opposition, including Hildenborough, Bidborough and Penshurst Parish Councils and Kent County Council.

A number of stakeholders voiced concern about what aircraft would do once they had passed the end of a shortened NPR, in particular that it would free aircraft to fly across a far broader area of airspace closer to the airport. There was a concern that this would lead to dispersal above a far larger geographic area. Furpine Residents Association and Betchworth Parish Council were concerned that shortened NPRs would lead to a loss of the 'predictability principle' and vectoring would see aircraft flying over a greater number of areas of Betchworth. Kent County Council recognised that there might be benefits were all aircraft to have reached an altitude of 4,000ft by the end of the NPR, but that if some aircraft did not attain this altitude by this point then they could be free to continue climbing on a non-fixed course. Mole Valley District Council was concerned that a shortened NPR would reduce the safeguards for those living in line with, but beyond the NPR. It stated that there could be an increased experience of noise for these residents.

Westerham Town Council considered it inappropriate to make changes based on the performance ability of some aircraft, when other, particularly older aircraft are not considered to be able to meet the same noise and performance levels. Similarly, Newdigate Parish Council noted that aircraft performance has improved, and that it has led to a reduction in noise associated with the use of thrust at take-off. However it was concerned that the introduction of a shortened NPR had the potential to force aircraft use a greater level of thrust, and therefore generate an increase in noise, in order to reach 4,000ft earlier. Edenbridge Town Council considered that the proposal was too optimistic in its assessment of aircraft performance. It considered that while these standards are obtainable by modern aircraft, less capable aircraft are currently in service and potentially could remain so for several decades.

Many stakeholders expressed concern about the proposal to shorten NPRs in relation to experience of aircraft disturbance at ground-level. A number including Leigh Parish Council, Chiddingstone Church of England School and High Weald Council's Aviation Group stated that NPRs should be based on experience of noise rather than aircraft performance or that NPR swathes should provide an accurate reflection of the areas that may experience disturbance. Burstow Parish Council thought that the ultimate aim of the NPRs should be to be able to act as a guide to people looking to buy property. There was a desire from organisations including Cowden Parish Council for noise impact to be reduced or at most kept

to existing levels. Others suggested that NPRs should also represent where there is potential for noise resulting from over-flights of nearby areas.

East Grinstead Town Council was concerned that residents may feel misled if they expected noise impacts to be lessened if shortened routes are then used by aircraft which are either unable to reach the required altitude before the end of the NPR or which reach the correct altitude only by flying at full throttle and therefore producing comparatively greater volumes of noise. Weald Action Group Against Noise and Tunbridge Wells Borough Council endorsed aircraft climbing as fast as possible as it considered this would reduce the impact on noise for local people, although Tunbridge Wells Borough Council said that airplanes should continue to climb to higher altitudes as it believes that noise still represents a problem for any people at 4,000ft, which means in practice that NPRs would probably need to be extended.

Coneyhurst Concern Group is concerned that too much attention is paid to mitigating noise impacts in built-up areas at the expense of rural ones. Warnham Parish Council did not express a preference as it felt that there was not sufficient information available.

6.2.2 Re-centre and narrow PBN route NPR

Of the stakeholder organisations that used the response form to respond to the consultation, 38 answered **Question 7a**. This was the question which asked whether NPR should be re-centred and narrowed to correctly reflect the route of aircraft on the PBN route for Runway 26 DVR/CLN/LAM departures. Stakeholder organisations who expressed a preference were evenly split between those which were supportive (12) and those which were opposed to the proposal (12). However, the single most chosen option was definitely not (10). Many stakeholder organisations indicated that they did not have an opinion (14). Stakeholders responded as follows:

- Yes – definitely (7 responses)
- Yes – probably (5)
- No – probably not (2)
- No – definitely not (10)
- Don't know (14)

Of the stakeholder organisations that used the response form to respond to the consultation, 32 answered **Question 7b**. This was the question which asked which, if any factors respondents believed to be the most important for GAL to consider when determining whether to correct the published NPR for the Runway 26 DVR/CLN/LAM route. The factors raised by frequency of response were:

- NPR swathes affect house prices (15 responses)
- NPR swathes should indicate potential noise impact from over-flights of nearby areas (15)
- NPR swathes should only cover areas that are likely to be directly over-flown (10)
- NPR swathes affect the local economy/investment in the area (7)
- NPR swathes affect tourism (9)
- None of these (2)
- Don't know (8)

Of the stakeholder organisations that used the response form to respond to the consultation, nine stakeholder organisations suggested factors additional to those provided in Question 7b. Godstone Village Association, Park Lane Reigate Residents' Association and Seraphina Mind Studio were concerned about the impact on properties or the people who lived below the NPR. Betchworth Parish Council was concerned that shorter NPRs would lead to more people being affected by flights,

particularly in Betchworth. A Parish Councillor for Sevenoaks Weald Parish Council suggested that swathes should be widened in order to give respite to local people.

A number of stakeholder organisations provided comments at **Question 7c** on the response form or via emails and letters that made reference to re-centring and narrowing NPRs to correctly reflect the route of aircraft on the PBN route for Runway 26 DVR/CLN/LAM departures. A number of these organisations, including Hever Residents Association, Langton Green Village Society, Nutfield Conservation Society, The Nevill Estate Company Ltd and Tonbridge Civic Society said that the proposals were not relevant to them. Hildenborough Parish Council stated that it did not support the proposal.

Several stakeholders including Ashdown Forest Tourism Association, Burstow Parish Council and Westerham Town Council reflected on their experiences of aircraft flight paths, accepting that there was evidence that there is a discrepancy between the published NPR and the routes that many aircraft actually fly. Conversely Betchworth Parish Council considered that the majority of flights do follow the NPR, pointing to figures published by GAL. It argued that failure of a small minority of flights to follow the route is insufficient justification for change.

Crawley Borough Council stated that NPRs are not formal routes, but a method of monitoring aircraft flight-paths, on this basis it agrees that an NPR serves no function if it does not reflect actual flight paths and therefore should be updated. However, it stressed that such changes should not happen without consultation. Westerham Town Council agrees that NPRs should accurately reflect flight paths. In contrast, Withyham Parish Council stated that any modification should remain within the footprint of the existing NPR. East Grinstead Town Council and Tunbridge Wells Borough Council stated that any route should be designed in a considered fashion and aircraft expected to adhere to it. It stated that amending the route in response to 'rogue flying' was a very good reason as this activity creates considerable anger amongst local communities. Tunbridge Wells Borough Council added that potentially an increased number of people could be affected by the proposal and that it thought that communities' interests should be put before commercial imperatives.

Other stakeholder organisations discussed impacts on communities. Reigate & Banstead Borough Council and Burstow Parish Council both referred to existing tension in local communities regarding noise in locations such as Horley. Park Lane Reigate Residents' Association opposed the over-flying of residential areas by aircraft. It endorsed a narrow corridor avoiding populated areas. Warwick Park Area Residents Association stated areas of high population should be avoided, particularly Tunbridge Wells.

6.2.3 Variable width NPRs

Of the stakeholder organisations that used the response form to respond to the consultation, 41 answered **Question 8a**. This was the question which asked whether to consider NPR swathes with variable widths. Stakeholder organisations who expressed a preference were fairly evenly split between those which were supportive (15) and those which were opposed to the proposal (18). Stakeholders responded as follows:

- Yes – definitely (5 responses)
- Yes – probably (10)
- No – probably not (5)
- No – definitely not (13)
- Don't know (8)

Of the stakeholder organisations that used the response form to respond to the consultation, 35 answered **Question 8b**. This was the question which asked which, if any factors respondents believed to be the

most important for GAL to consider when determining whether to introduce variable width NPR swathes. The factors raised by frequency of response were:

- NPR swathes should indicate potential noise impact from over-flights of nearby areas (18 responses)
- NPR swathes affect house prices (15)
- NPR swathes should only cover areas that are likely to be directly over-flown (9)
- NPR swathes affect tourism (9)
- NPR swathes affect the local economy/investment in the area (7)
- None of these (2)
- Don't know (8)

Of the stakeholder organisations that used the response form to respond to the consultation, six stakeholder organisations suggested factors additional to those provided in Question 8b. Chiddingstone Castle was keen for NPR swathes to accurately indicate noise-impacts over local areas. High Broom Lane Road Association was especially concerned about potential noise over Crowborough and Park Lane Reigate Residents' Association said quality of life was an important factor to consider.

Some stakeholder organisations provided comments at **Question 8c** on the response form or via emails and letters that made reference to variable width NPRs. A number of these organisations, including Rudgwick Parish Council, The Wiggonholt Association and Tonbridge Civic Society said that they could not comment or the proposal was not relevant to them or that they were not able to comment.

Several stakeholder organisations, including Hildenborough Parish Council, Langton Green Village Society and Kent County Council stated clear opposition to variable width NPRs.

Kent County Council said that the current 3km width, and location of NPRs should be retained. Similarly, The Trustees to the Frontagers said that any changes that were implemented should be within the boundaries of existing NPRs.

Other stakeholder organisations advocated retaining existing NPRs, making a series of points, including that; NPRs were determined for specific purposes and aircraft should not be allowed to transgress from them, that any changes should be made within the confines of the established NPRs, that NPR swathes lack value or are misrepresentative if they do not indicate the location of noise disturbance, and that wider swathes are fairer ways to distribute the negative noise impacts. Godstone Village Association advocated the spreading of noise impacts. It suggested that NPRs should be wide enough so that more people are affected but at a lower level than would be the case with narrow swathes. High Weald AONB Unit noted that narrow swathes could reduce the number of residents within the AONB impacted by noise. While it stated that it considered broad swathes fairer in spreading impacts it could support narrow swathes so long as respite options were to be included.

Burstow Parish Council said that variable width NPRs would increase confusion. It preferred modifying NPRs to routes that are practical for aircraft but without any change to width. Park Lane Reigate Residents' Association was concerned that variable NPRs would result in there being less control over aircraft and a possible growth in disturbance. easyJet stated that the adoption of RNP1 with RF technology would negate the need for variable width swathes. Weald Action Group Against Noise stated that they wish for all swathes to be as narrow as possible.

Several stakeholder organisations, including Chiddingstone Parish Council and Hever Residents Association indicated they thought variable swathes should probably be considered and that NPR swathes should indicate actual noise impact from over-flights of nearby areas. Similarly Keep Ruser

Green and Leigh Parish Council stated that NPRs should reflect where noise is experienced. Keep Ruspur Green suggested that it would find it acceptable for NPRs to narrow slightly as altitude increased.

Crawley Borough Council suggested that it made sense for NPRs to be the width required for all aircraft to be able to operate within when flown in a reasonable fashion. Edenbridge Town Council stated that it would be supportive of the proposal if it enabled aircraft to operate at lower noise levels due to easier manoeuvres.

Leigh Parish Council said that NPR widths should be determined by the approach that minimises disturbance to those over-flown, in their opinion either the widest possible or preferably a series of multiple narrow NPRs over the areas already affected by noise.

A couple of stakeholder organisations commented on the level of information provided to aid comprehension of the proposal. Betchworth Parish Council stated that information was too general and that it could not comment without details for specific NPRs and noise data. CAGNE said that it did not find the information provided useful and that questions were too difficult for non-specialists to understand. Tunbridge Wells Borough Council stated that it would like more research conducted into the potential noise impact of the proposal on communities. Withyham Parish Council made a suggestion for improving the flight path diagrams.

6.3 Members of the public

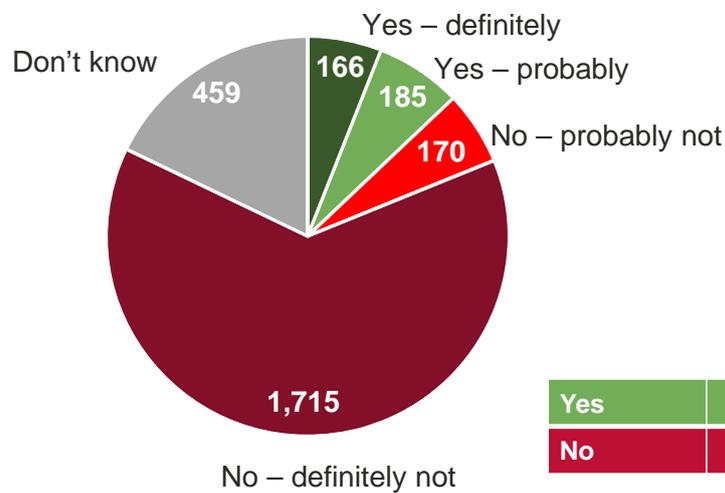
6.3.1 Re-centre and narrow NPRs

Response form

There were 2,695 members of the public who answered **Question 5a** on the response form which asked about the extent to which the respondent supported re-centring and narrowing the published NPRs. A total of 351 respondents supported re-centring and narrowing the published NPRs, and 1,885 were opposed. Around one in six didn't know.

Changes to the published NPRs

Q Should Gatwick Airport Limited re-centre and narrow the published NPRs to take account of aircraft performance on the modern PBN routes in place at Gatwick Airport?



Base: 2,695 responses from individuals between 23 May and 15 August 2015

Source: Ipsos MORI

Ipsos MORI
Public Affairs
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Of the members of the public who used the response form to respond to the consultation, 2,610 answered **Question 5b**. This was the question that asked which, if any factors respondents believed to be the most important for GAL to consider when re-centring and narrowing published NPRs. The factors raised by frequency of response were:

- NPR swathes affect house prices (1,364 responses)
- NPR swathes should indicate potential noise impact from over-flights of nearby areas (1,277)
- NPR swathes should only cover areas that are likely to be directly over-flown (483)
- NPR swathes affect the local economy/investment in the area (446)
- NPR swathes affect tourism (354)
- None of these (91)
- Don't know (260)

Of the members of the public that used the response form to respond to the consultation, 147 made general comments about the factors most important for GAL to consider with respect to re-centring and narrowing published NPRs. These comments included comments about noise (50), and impact on quality of life (49).

A total of 13 respondents expressed concern about the frequency or volume of flights, both in general (6) and in relation to specific locations; Brockham (2); Sevenoaks (2); and Earlswood, Nutfield and Tonbridge (1 comment each). There were concerns about the impact of on quality of life, sleep and health (49), and on local people and communities in residential areas in general (17). In contrast 15 comments were concerned about the impact on rural and countryside areas. Some people were specifically concerned about the impact on those people who chose to buy a property away from flight paths, including those who paid a higher price in order to achieve this (18). Others stated their opposition to the ADNID flight path trial and advocated a return to the previous routes (19).

Supportive comments were made in favour of narrow NPRs (8), variable width NPRs (4) and night time respite (3).

Negative comments included opposition to change of NPRs in general (65), opposition to narrow NPR swathes: in general (17); because they would create a noise disturbance for people living beneath them (37) or affect the health or quality of life of those living beneath them (17). Similarly some respondents explicitly stated their support for wider NPR swathes to distribute impacts to a greater number of people but at an overall lower level (34).

There were 48 members of the public who suggested alternatives for reducing the impacts on people including routing flight paths away from built-up areas (3), or from rural areas (4); reducing or minimising noise impacts (5) and reducing the frequency or volume of flights (3). Other suggestions included ensuring planes stick within the boundaries of NPRs (8) or using multiple routes in order to provide respite to those over-flown (6).

Of the members of the public who used the response form to respond to the consultation, 610 provided a response to **Question 5c**. Where respondents clearly stated support or opposition to the proposal 39 were in support, and a further 22 indicated that they supported the idea conditionally. However 189 respondents stated that they opposed narrower NPR swathes and a further 24 that they opposed re-centring or realignment of NPRs.

Of those who welcomed narrowed and/or re-centred NPRs, 25 respondents provided reasons for their support. This is mostly because it was thought that narrower NPRs would reduce the number of people affected by aircraft noise (24) or that they would directly benefit people living in Capel specifically (1).

Just over half of respondents suggested a negative impact that they thought would occur (323). These included; noise (193), including noise impact on those directly beneath the route (165); the impact on the quality of life, health and well-being of those living beneath the routes (115); that it would concentrate general impacts on those living beneath either NPRs (30), or beneath arrivals flight paths specifically (11). Sixteen comments expressed doubt that narrower NPRs would be practicable as they didn't think that aircraft necessarily adhere to NPRs.

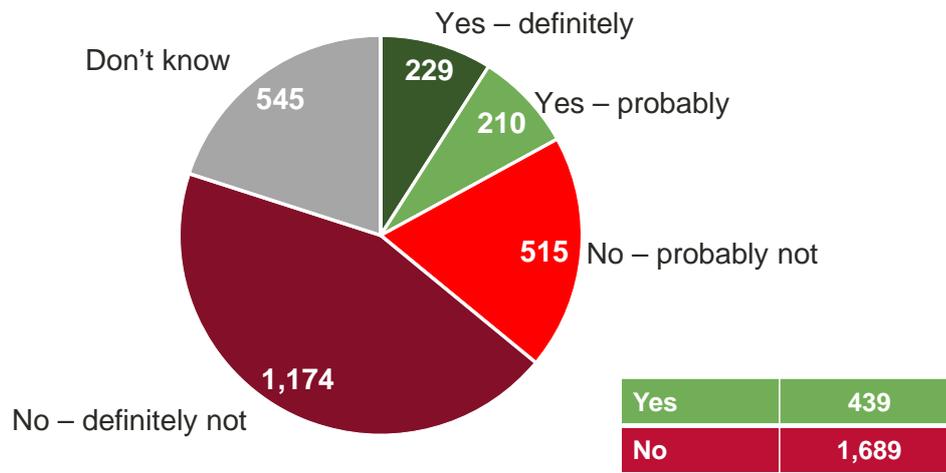
Respondents made a number of suggestions for alternatives or modifications to the proposals. Chiefly that they would prefer to see the use of wider NPR swathes in order to distribute negative impacts across a greater area. Many saw this to be fairer (259). Similarly, there were 48 comments that wider NPRs would benefit more people. Others suggested that narrower NPR swathes should only be introduced if further evidence to justify them is provided (15), or if multiple narrow NPRs were introduced so that people living under the narrowed NPR have the opportunity for respite (14). Thirteen comments remarked that new PBN departure routes should be located within the existing NPRs.

6.3.2 Shortened NPRs

There were 2,666 members of the public who answered **Question 6a** on the response form which asked whether shortened NPRs should be implemented. There were 439 respondents who supported shortened NPRs - 1,689 opposed.

Implementation of shorter NPRs at Gatwick

Q Should Gatwick Airport Limited implement shortened NPRs to take account of the observed climb performance of the flights at Gatwick Airport?



Base: 2,673 responses from individuals between 23 May and 15 August 2015

Source: Ipsos MORI

Ipsos MORI
Public Affairs

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Of the members of the public that used the response form to respond to the consultation, 2,577 answered **Question 6b**. This was the question which asked which, if any factors respondents believed to be the most important for GAL to consider when determining whether to implement shortened NPRs. The factors raised by frequency of response were:

- NPR swathes affect house prices (1,302 comments)
- NPR swathes should indicate potential noise impact from over-flights of nearby areas (931)
- NPR swathes should only cover areas that are likely to be directly over-flown (482)
- NPR swathes affect the local economy/investment in the area (406)
- NPR swathes affect tourism (333)
- None of these (78)
- Don't know (338)

Of the members of the public that used the response form to respond to the consultation, 139 made general comments. There were 60 respondents who raised concerns about noise, including about its general impact (45 comments), and impact in areas where aircraft noise has not previously been considered a problem (6).

There were several issues related to quality of life including: the impact on communities and residential areas (10) and on the health, sleep and well-being of people (43). Ten comments raised concern about the negative impact on people who had chosen to buy, and often paid a premium in order to do so, a

property away from flight paths. Some respondents were concerned about the ADNID flight path trial and suggested that routes revert to those previously used (15).

Some respondents stated their support for shortened NPRs (3), or conditional support (4). Specific reasons for support included reducing the area over which impacts are experienced (3) and minimising the impact of noise (6).

Eighteen comments were critical of shortened NPRs because they thought that the steeper climb involved would lead to aircraft producing increased volumes of noise, additional comments suggested that this noise would mean that this increased noise would be experienced by people at ground level (8). Some respondents simply opposed any changes to existing NPRs (47), their opposition was to any increase in noise (10). Others stated that they favoured wider NPR swathes as they thought this would more fairly disperse negative impacts of flight paths (17).

Of the members of the public that used the response form to respond to the consultation, 258 provided a response to **Question 6c**. Of those who clearly stated support or opposition to the proposal, 39 respondents stated support for shorter NPRs, and a further seven respondents indicated that they supported the idea conditionally. However, 67 respondents stated that they opposed.

Those who provided comments to explain their support for shortened NPRs suggested that the steeper climb would reduce the ground area affected (14) and mean a reduction in disturbance, including noise at ground level (37).

Those who were critical suggested that the shortened NPR would lead to aircraft climbing at full throttle in order to climb quickly enough and that this would mean that aircraft were making more noise than if climbing at a lesser rate, and therefore noise experience at ground level would actually be greater (103). Some respondents stated that a shortened NPR would produce a negligible improvement (10).

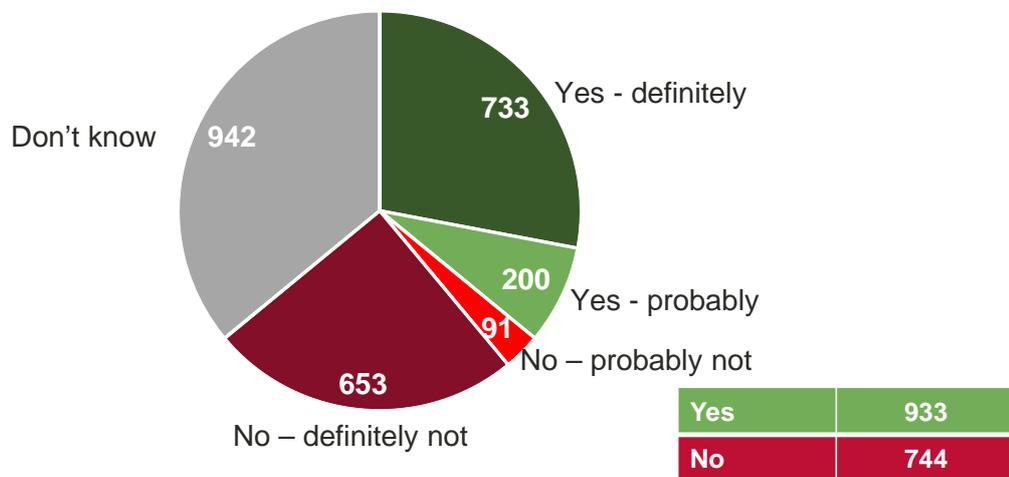
A number of alternative suggestions were made. These included; only shortening NPRs if noise disturbance was actually reduced (20), or that more evidence needs to be presented first (5), if shortened NPRs are introduced they must be enforced to ensure they are adhered to (7). Two comments suggest that shortened NPRs should only be introduced over the existing NPRs.

6.3.3 Re-centre and narrow PBN route NPR

There were 2,612 members of the public who answered **Question 7a** on the response form. This was the question which asked whether NPR should be re-centred and narrowed to correctly reflect the route of aircraft on the PBN route for Runway 26 DVR/CLN/LAM departures. A total of 930 respondents said that they supported re-centring and narrowing the route and 743 said they opposed it. One-third of those who responded to the question said that they didn't know.

Changes to the PBN route for Runway 26

Q The existing PBN route for RWY26 DVR/CLN/LAM departures means that aircraft fly outside the NPR. Should Gatwick Airport Limited re-centre and narrow the published NPR to correct this anomaly?

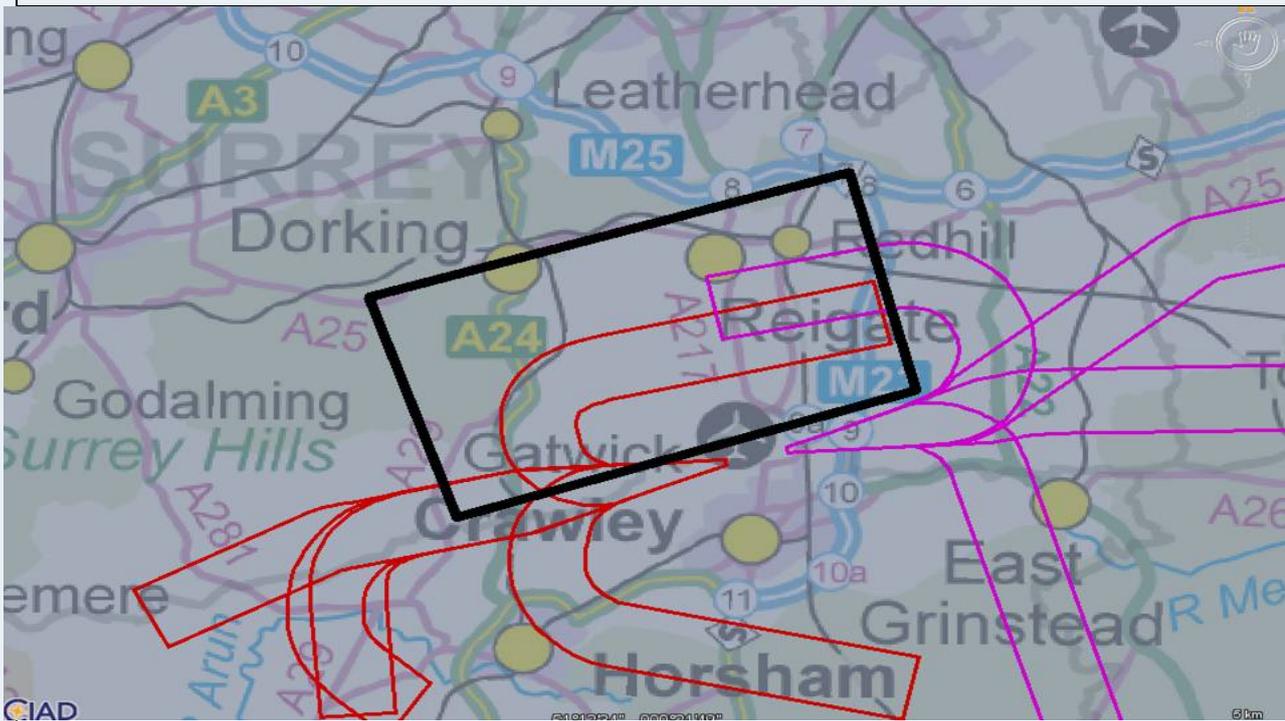


Base: 2,619 responses from individuals between 23 May and 15 August 2015

Source: Ipsos MORI

The map and chart on the next page shows the answer to Question 7a for respondents with a postcode within the area most likely to be affected by the proposal.

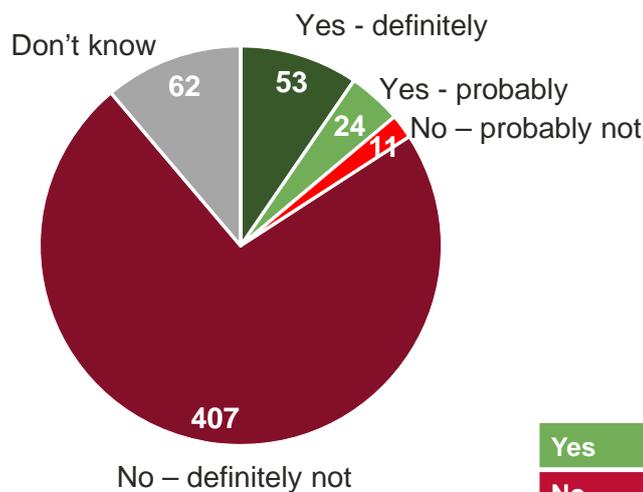
Map 6.1 – Geographical analysis of general public responses



While more respondents overall were in favour than against the proposal, this was not the case for those who resided in the black area as shown on the map. Many more respondents were against, than for the proposal.

Changes to the PBN route for Runway 26 – Black Area

Q The existing PBN route for RWY26 DVR/CLN/LAM departures means that aircraft fly outside the NPR. Should Gatwick Airport Limited re-centre and narrow the published NPR to correct this anomaly?



Base: 557 responses from individuals between 23 May and 15 August 2015

Source: Ipsos MORI

Of the members of the public that used the response form to respond to the consultation, 2,315 answered **Question 7b**. This was the question which asked which, if any factors respondents believed to be the most important for GAL to consider when determining whether to correct the published NPR for the Runway26 DVR/CLN/LAM route. The most important factors raised by frequency of response are shown in the table.

Table 6.1 – Most important factors for GAL to consider

All respondents	Respondents who resided in the Blue Area only
NPR swathes affect house / property prices (950)	NPR swathes should indicate potential noise impact from over-flights of nearby areas (250)
NPR swathes should indicate potential noise impact from over-flights of nearby areas (855)	NPR swathes affect house / property prices (244)
NPR swathes should only cover areas that are likely to be directly over-flown (468)	NPR swathes affect the local economy and investment in the area (137)
NPR swathes affect the local economy and investment in the area (392)	NPR swathes should only cover areas that are likely to be directly over-flown (125)
NPR swathes affect tourism (314)	NPR swathes affect tourism (99)

Overall, of the members of the public who used the response form to respond to the consultation, 115 made general comments. Noise was a significant concern to respondents (36). Of these, 17 were general in nature while others were concerned about impact on locations previously considered to be unaffected by noise (10). Others were concerned about the frequency of flights (12). A number of respondents referred to potential impacts on local people and communities (13), as well as to specific impacts on people including impact on quality of life, sleep, health and well-being (32) and potential impacts on people who chose to buy a house away from flight paths and aircraft noise, and who may have paid a premium in order to do so (14). Conversely ten comments expressed concern about the potential impact on rural areas. Some respondents were concerned by the ADNID flight path trial and expressed a wish for flights to return to the previously used routes (18).

Two respondents expressed support for the correction of NPRs in general while there was some support for ensuring that NPRs do accurately reflect where aircraft actually fly (5) or the impact of noise (2). A total of 54 responses objected to the proposed changes to NPR swathe in general. Others opposed increased noise (6), narrowed NPRs. Some opposed in general (4) while others opposed because of the noise and disturbance to people at ground level (10) or quality of life impacts (6). Alternatives suggested included routing flight paths further to the south of Leigh (8) or ensure that aircraft noise is reduced (6). Others wanted to see NPRs enforced (15).

Of the members of the public that used the response form to respond to the consultation, 338 provided a response to **Question 7c**. Of those who clearly stated support or opposition to the proposal, 19 comments supported correcting the published NPR for the Runway26 DVR/CLN/LAM route. However 63 respondents stated that they opposed shorter NPRs. Others challenged the need for NPR revision in general (96).

Of those who welcomed revision of the published NPR for the Runway26 DVR/CLN/LAM route states that it will mean that where aircraft actually fly is accurately published (32), or similarly, that the routes published would give an accurate depiction of where noise impacts were felt (7). One comment refers to the revision of the Runway26 DVR/CLN/LAM route to reflect modern PBN standards in November 2013. It suggests that this revision has led to reduced fuel emissions for aircraft using that route.

Critical comments often refer directly to the changes made to the Runway26 DVR/BIG/CLN introduced in November 2013 to reflect changes due to modern PBN standards. Some expressed concern that those changes were introduced without consultation (53). Some suggested that the revisions have increased the number of people affected by aircraft (9) including areas considered to previously be unaffected by aircraft (21), including specific locations like Holmwood (5).

Many made complaints about the increased volume of flights in their area (29), as well as the effect the revision has had on their experience of noise either in general (34) or in specific locations including Betchworth (17), Brockham (16), Holmwood (9) and Capel (6). Worsened experience of night time and early morning flights in general was also raised (9), including in specific locations including Brockham (9), Betchworth (3) and Leigh (2). Forty-nine comments suggested that there has been a worsening of people's quality of life including health, sleep and well-being. Others suggest that the revision has negatively impacted on rural areas.

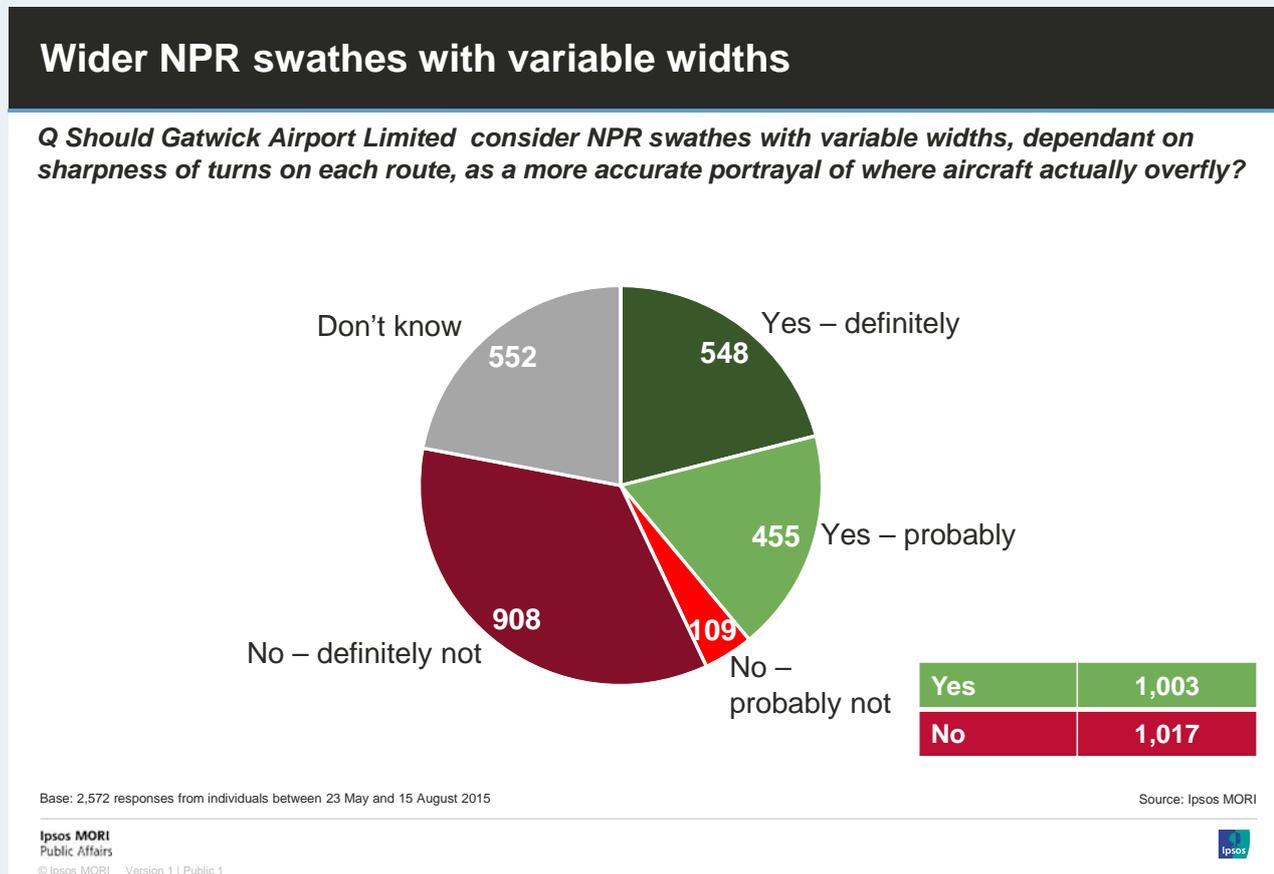
A number of alternative suggestions were made by respondents such as; that NPRs should be adhered to by aircraft, and deviation should potentially be penalised (33); that rather than modify existing NPRs to reflect modern PBNs, these PBNs should be modified so that they fit within the historic NPRs (16); that the revised route should avoid flying over residential and populated areas, and instead pass over the countryside (5); that departures on this route should turn sooner, or fly further south (9); that aircraft should climb higher, or travel further north before turning (2). The table shows the top five comments that were made by those who responded to Question 7c.

Table 6.2 Top five comments by area

All respondents	Respondents who resided in the Black Area only
Oppose correction of NPRs / changes to NPRs are unnecessary / not needed / leave NPRs as they are (96)	Oppose correction of NPRs / changes to NPRs are unnecessary / not needed / leave NPRs as they are (52)
Oppose changes to RWY26 north / northeast bound DVR / CLN / BIG / LAM departures (63)	Oppose changes to RWY26 north / northeast bound DVR / CLN / BIG / LAM departures (51)
Concerns about lack of prior consultation on RWY26 DVR / CLN / LAM NPR change (53)	RWY26 DVR / CLN / LAM NPR change has negatively impacted quality of life / health and well-being / sleep (44)
RWY26 DVR / CLN / LAM NPR change has negatively impacted quality of life / health and well-being / sleep (49)	Concerns about lack of prior consultation on RWY26 DVR / CLN / LAM NPR change (32)
RWY26 DVR / CLN / LAM NPR change has increased aircraft noise (34)	RWY26 DVR / CLN / LAM NPR change has increased aircraft noise (31)

6.3.4 Variable width NPRs

There were 2,565 members of the public who answered **Question 8a** on the response form. This was the question which asked whether GAL should consider NPR swathes with variable widths. Nine hundred and ninety-eight respondents supported variable width NPRs, and 1,016 were opposed. One in five of those who responded to the question said that they didn't know. Members of the public responded as follows:



Of the members of the public that used the response form to respond to the consultation, 2,494 answered **Question 8b**. This asked which, if any factors respondents believed to be the most important for GAL to consider when determining whether to introduce variable width NPR swathes. The factors raised by frequency of response were:

- NPR swathes affect house prices (1,269 comments)
- NPR swathes should indicate potential noise impact from over-flights of nearby areas (1,257)
- NPR swathes should only cover areas that are likely to be directly over-flown (471)
- NPR swathes affect the local economy/investment in the area (402)
- NPR swathes affect tourism (326)
- None of these (65)
- Don't know (325)

Of the members of the public that used the response form to respond to the consultation, 102 made general comments. Key concerns included noise (36), of which the majority were concerned with the potential increase in noise impact (19). Concerns about impacts on residential areas in general (15), and the health, sleep and well-being of residents specifically (30) were also raised. Additionally there were concerns raised about the ADNID flight path trial, with a number advocating the return to the previous routes (14).

Positive comments included support for variable width swathes (8) as well as support for correctly NPRs to accurately reflect where aircraft fly (3) or to accurately reflect noise impacts (2).

Negative comments included general opposition to changes to NPR swathes (38), opposition to narrow NPRs; because of noise impacts (8) or impacts on people's quality of life such as health, sleep or well-being (11).

Alternative suggestion included minimising the number of turns made by aircraft (3), ensuring aircraft stay within NPRs (8) and reducing noise or the impact of noise (4).

Of the members of the public that used the response form to respond to the consultation, 126 provided a response to **Question 8c**. Of those respondents that clearly stated their support or opposition, 21 comments indicated support of the proposal for variable width NPR swathes, with a further five supporting the idea conditionally. However 43 respondents stated that they opposed variable width NPR swathes.

A number of respondents outlined suggested benefits of variable width NPRs. These were; agreement with the idea that published NPRs should accurately represent where aircraft fly in practise (36); that variable widths would enable larger turning circles for aircraft that do, or otherwise would find tight turns difficult (4); that wider NPR swathes would mean negative impacts would be dispersed over a wider area and between a greater number of people (19); and that fewer people would be affected negatively by noise (5).

Negative comments made included; that variable widths would increase the uncertainty of where and when aircraft would fly (4); that they mean that aircraft would over-fly more areas, including areas not previously affected (2); that variable swathes would be impractical to implement (2); and that they would increase noise levels (1).

Several alternative suggestions were made. These were for variable swathes to only be considered for specific parts of the NPR (2) and for variable width NPRs to be used only if it means that there will either be no change on, or a reduction of the impacts on people (2).

6.4 Responses by email and post

6.4.1 Re-centre and narrow NPRs

Of the members of the public who responded to the consultation by sending an email or a letter, 222 made a comment regarding re-centring and narrowing published NPRs. Where respondents clearly stated their support or opposition to the proposal 13 comments were supportive of narrow NPR swathes, and a further one provided conditional support. Some 77 respondents stated that they opposed narrow NPRs and a further 13 opposed re-centred or realigned NPR swathes.

Respondents identified the condensing of impacts into a smaller area and therefore reducing the number of individuals negatively experiencing aircraft noise as the positive benefit of narrowed NPR swathes (9).

Half of respondents (110) identified potential negative impacts resulting from narrowed and re-centred NPRs. Of these, issues related to noise were the most cited. There were concerns that noise would be concentrated on a smaller number of people who would experience an increased impact (41) and some identified communities including Penshurst (10), Langton Green (6) and Brockham (4), where this might be felt specifically. Similarly 22 comments suggested that a particular aspect of the lives of those living beneath that would be affected would be their quality of life including sleep, health and well-being (22).

Others suggested that narrower NPRs will mean noise has an impact on more people (5). Eight comments expressed concern about the impact a narrowed NPR would have on rural areas. Ten comments raised concerns about the impact on noise sensitive areas, or on the character of the local area (2). Eight comments indicated a belief that modern technology would be capable of working alongside a broad swathe approach and so it doesn't necessarily justify the introduction of narrow NPRs.

Some respondents suggested alternatives. The majority of these advocated introducing wider NPR swathes, because they were seen to be fairer in how they distribute impacts or provide the possibility of respite (118). Four comments stated that swathes should not be narrowed unless multiple routes are introduced in order to offer people the chance for respite. Others thought that narrow NPRs should only be introduced within existing NPR swathes (6) or NPR swathes should be a maximum of 1 kilometre in width (1).

6.4.2 Shortened NPRs

Of the members of the public who responded to the consultation by sending an email or a letter, 36 made a comment regarding shortened NPRs. Where respondents clearly stated their support or opposition to the proposal three indicated their support and 22 their opposition.

The positives of shortened NPRs were seen to be that aircraft would climb, and therefore reduce the size of the area on the ground affected (1) and reduce the level of disturbance experienced (2).

Seven respondents suggested negative consequences of the proposal. These were; that in order to climb faster aircraft engines would need to be set to full throttle, meaning that engines would be producing a greater level of noise which would ultimately increase the level of noise experienced at ground level (6); and that shortened NPRs would achieve a negligible improvement (2).

In addition a couple of respondents suggested alternative approaches; that NPRs should only be shortened if noise is reduced (1) and evidence has been made available (1).

6.4.3 Re-centre and narrow PBN route NPR

Of the members of the public who responded to the consultation by sending an email or a letter, 74 made a comment about re-centring and narrowing NPRs. Where respondents clearly stated their support or opposition to the proposal seven indicated their support and 32 their opposition.

Critical comments often refer directly to the changes made to the Runway26 DVR/BIG/CLN introduced in November 2013 to reflect changes due to modern PBN standards. Thirteen comments were made about the lack of consultation around those changes. Respondents also commented on how the changes had led to an increased volume of flights in the area generally (11) and in the level of noise experience in the area in general (7); as well as in specific locations such as Brockham (6), South Holmwood (5), Beare Green (3), Holmwood (3) and Reigate (3). Six comments stated that aircraft now impact on areas previously unaffected by flights. Some said that the changes had affected peoples' quality of life (6); on the environment (4); and rural and protected areas (5).

Alternative suggestions were that any revised NPR should be routed away from populated areas (3); that rather than change NPR to reflect actual flight paths aircraft should instead ensure they stay on course (8) or the PBN route should be made to fit within the existing NPR (2).

6.4.4 Variable width NPRs

Of the members of the public who responded to the consultation by sending an email or a letter, 18 made a comment about variable width NPRs. Where support or opposition was clearly stated seven respondents supported variable width NPRs and eight opposed.

Seven respondents detailed positives that variable swathes might have. They suggested that they would better reflect where aircraft actually fly (4), and that they would spread negative impacts over a wider area (3).

7 General comments

7.1 Overview

This chapter provides a summary of responses to question 9 on the response form which asked for additional comments relevant to the consultation. It includes response received via email and post that do not directly address any of the consultation questions.

Question wording (Response Form)

RWY26 Departures

Q9.

What, if any, additional comments do you have that are relevant to this consultation and that you would like to make?

Summary of consultation responses

A large number of other comments were made by stakeholder organisations and members of the public. Some respondents tended to repeat points they had already made at specific questions, and others provided comments about the consultation itself. Others still made comments and suggestions beyond the scope of the consultation. These comments are briefly summarised in this chapter.

Stakeholder organisations

Some stakeholder organisations made general comments and suggestions about departures and arrivals. These included comments about the angle of trajectory of departures; that P-RNAV had not been considered as an appropriate means of minimising negative impacts from aircraft; and concern that some flights fly at very low altitude. There were also concerns about narrow swathes; that the consultation focussed too much on departures at the expense of arrivals; and that the present system of arrivals should be retained.

Other comments and suggestions were made about respite, night flights, flight paths and NPR swathes, and concerns about pollution. Many different areas were mentioned as being impacted currently, and/or that would be impacted as a result of the proposals. A number of suggestions were made, including that there should be a policy that offers maximum respite for all communities; that airports and airlines must enable improvements to minimise noise; and that people over-flown as a result of any proposal should be compensated.

A number of stakeholder organisations criticised the consultation document and process. Concerns raised included that the consultation was vague, complicated, unfair or inaccurate. Others mentioned that the consultation was too premature, given the pending Government decision on additional runway capacity in the south east next year.

A number of stakeholders that responded endorsed the response/views of other organisations, including High Weald Area Action Group, GACC and GATCOM, as well as a number of parish council responses.

Members of the public

A large number of respondents made additional comments, many similar to those made by stakeholder organisations. Again, many different areas were cited as being impacted and blighted by aircraft, and in particular, by aircraft noise. Some respondents provided positive and supportive comments, but many others were critical. Concerns raised included impact of night flights; increased frequency or volume of flights; impacts on local communities from aircraft blight included negative impacts on the environment, and on house prices. Many respondents were also critical about the consultation and process, raising similar points to those raised from stakeholder organisations.

7.2 Stakeholder organisations

A number of stakeholder organisations that responded to the consultation made additional comments. A brief summary of comments follow.

Departures

Several stakeholder organisations made comments about aircraft departures. These comments included:

- That effort should be made to investigate the feasibility of increasing the angle of trajectory for departing aircraft, which once the Heathrow ceiling is reached, could enable aircraft to ascend faster, which would reduce noise impact on local communities.
- That while P-RNAV should be able to take flights away from villages accurately, this has not been considered as an appropriate means of minimising impact.
- Adverse impact of westerly departures over elevated land, such as Leith Hill given that average height of aircraft over-flying is 1,800-2,000ft.
- Concern that for RWY08 departures (route DVR/BIG/CLN), traffic would be concentrated along a single path, resulting in more noise for those over-flown. On the upside, it was recognised that flights using the LAM route directly over the Kent Downs AONB would be reduced.
- That there would be very little change for people who live near Gatwick Airport, unless steeper departures are adopted. Burstow Parish Council suggested that while steeper departures would lead to more noise over Smallfield, those who live further away from the airport would benefit. The Council added that *“With steeper departures, care will need to be taken that aircraft are not vectored away so soon that they then fly over routes not previously over-flown at relatively low heights”*.
- Concern that flights fly well below 2,000ft and as a consequence produce significant health impacts for those over-flown.

Arrivals

A number of stakeholder organisations responding to the consultation, made comments and suggestions about aircraft arrivals. This included:

- Concerns about the proposal to narrow the current swathe within which RWY26 arrivals are channelled.
- Worries that continuous overflight of arriving aircraft into Gatwick causes detrimental impact for the residents of West Kent
- A suggestion from Coneyhurst Concern Group that that arrivals should be dispersed over a wider area / over multiple routes to lessen impact on local people *“we urge dispersal in the interest of all communities, not concentration in the interest of urban communities and/or Gatwick flight controllers’ convenience”*.
- An argument that as respite routes for day time arrivals are not possible because of the volume of day time traffic, that the present system of arrivals should be retained so that communities and recreational areas are not burdened with new or worsening concentrated arrival routes.
- Concern about gradual extension over the past decade or so of the glide path for arriving aircraft which brought arriving aircraft over new areas of west Kent, and has caused, and is causing, great anger among residents, especially in the area from Lingfield to Tunbridge Wells, and in the High Weald AONB.
- Capel Parish Council was concerned about aircraft landing over Clock House Beacon as low as 2,000ft.
- Chiddingstone Parish Council questioned why it is proposed to use PBN to manage arrivals on one specific narrow route, e.g. 500m wide NPR for arrivals when there is no stipulation in the CAA’s PBN Policy that this is a requirement of using PBN (Policy for the Application of Performance Based Navigation in UK/Irish Airspace) for safety, environmental or noise abatement reasons
- Tunbridge Wells Borough Council was concerned that the consultation focused too much on departures, and has *“...not addressed the big issue of landings which are lower and longer”*.
- Natural England said that while the proposed options for RWY26 arrivals which currently fly over the High Weald AONB would allow aircraft to more consistently join the final approach to the east or west of Hever Castle, during the day and night respectively, air traffic along these would be more concentrated over less densely populated areas.

Respite

A small number of the stakeholder organisations made specific comments about respite.

- Charwood Parish Council said that there is no metric available, nor adequate research, to provide evidence that respite offers any benefit to people on the ground *“for the communities such as ours there is no respite as whatever the inbound or outbound routing of the aircraft the noise is still present. To suggest that respite might allow a greater number of night flights must not even be considered”*.
- IATA supported in principle the proposal for respite departure routes to improve noise management where feasible and deemed appropriate as long as the design of respite route does not introduce significant inefficiencies.
- Coneyhurst Concern Group sought commitment that GAL would consult on the dispersal of arriving flights, and not to concentrate them without consultation.

Night flights

A few comments were received about night flights.

- Leigh Parish Council asked for the cessation of all night flights between midnight and 6am *“in order to eliminate the most disturbing aircraft noise for the benefit of our communities”*. Capel Parish Council suggested that there should be no night flights between 11pm and 6am,
- Hadlow Down Parish Council was concerned that the consultation focussed on night flights only having a noise impact up to 4,000ft, particularly as disturbance in the countryside can be at a substantially higher altitude (7,000ft+), and at night when ambient noise is low.

Flight paths / NPR Swathes

A number of comments were made about flight paths and NPR swathes. Comments included:

- The Trustees to the Frontagers were concerned about the impact aircraft would have on care homes in Crowborough and surrounding district. The organisation said that *“it would be uncaring and contemptuous by those who blithely determine where flight paths go without giving this major consideration”*.
- Some organisations, including Rudgwick Parish Council said that they *“...did not wish to have narrow flight paths which will be more aggravating to those directly underneath them. A spread is considered more appropriate”*.
- A number of stakeholder organisations, including Sundridge with Ide Hill Parish Council, were opposed to any changes to flight paths that would add to the number of people impacted. Rowhook and Clemsfold Amenity Society were also opposed to changing existing NPRs, and suggested that quality of life should be the first consideration. GACC said they would be sending their response to the Secretary of State, asking for any changes to flight paths to be vetoed. North Horsham Parish Council said that it would like to *“...re-iterate its opposition to all the proposed options for changes to the existing flight paths and NPRs”*.

- One organisation (that asked to remain anonymous) was concerned that by reducing the width of NPR swathes, this did not take into account increased noise and disturbance experienced by communities living directly below these routes. And Chichester District Council said that “...have found it difficult to specify which option is the more favourable as each of them affects different parishes within the Chichester District in different ways. If a narrow swathe is chosen, those unfortunate enough to be directly under the preferred routing are likely to experience more noise on a daily basis therefore the preference is for a wider swathe as this is likely to dilute the impact across a wider area”.
- Withyham Parish Council said it was “...appalled that a potential life altering and health damaging decision is being proposed without any proper assessment of the effect on the people most affected”. The Council question whether this is in fact a proper consultation due to the lack of definitive information on the narrowed flight paths.

Altitude

A number of concerns were made about the altitude of aircraft including:

- Concern about a high pitched whine from the A319/320/321 series of aircraft up to 25 miles from the airport.
- Cowfold Parish Council said that “...aircraft heights are so low that photographs have been taken which allow the underside markings to be read with ease”. And Chiddingstone Parish Council questioned why GAL need to fly more aircraft at low altitude in existing NPRs far away from the final approach path, given CAA guidance on continuous descent approach (CDA).
- Planes flying directly over the Tower of a Grade 1 Listed Church in Rusper Village at only 1,600ft, without consideration of impact on worshippers, as well as on occasions such as marriages, christenings and funeral ceremonies.
- Frant Parish Council stated that their residents “...have noted that aircraft appear to be stacking in the vicinity. Whilst it is appreciated that aircraft may have to wait before a descent is possible, it seems that they are concentrating in one area.”
- GACC stated that many new routes would be likely to be over elevated rural areas of Sussex, including the High Weald AONB. As such, aircraft would be lower than 4,000ft. On the other Hand, Crowborough Town Council said it was pleased that flights over highly populated areas will cease. The Council mentioned that due to Crowborough’s elevation, it has been adversely affected by low-flying aircraft.

Concerns raised

Stakeholder organisations raised a number of concerns, and highlighted a number of areas that could be impacted by the proposals. These included:

- Noise disturbance
- Impact on community buildings, schools and nursing homes. This included Burrswood Hospital in Groombridge and Tunbridge Wells Spire Hospital at Fordcombe
- That respite would not be a solution for arrivals
- Concerns about an increased number of flights
- Worries about pollution and emissions from aircraft

A number of areas that would be impacted included:

Area	Impact of the proposals
Chiddinghurst	CO ₂ emissions
Crawley	Noise
Dormansland	Concentration of inbound flights
Frant Parish	Increased flights
Areas immediately to the north west of Gatwick Airport (incl. Holmswood, Coldharbour, Leigh, Brockham, Betchworth)	Noise impact. Disturbance in the early morning and late at night.
Land west of Cophorne Land north of Horsham	Impact on proposed development sites
Newdigate Parish	Impact on greenbelt, rural area.
South of Mole Valley, and Waverley in Surrey	Noise impact
Tonbridge	Night flights have detrimental impact and sleep disturbance of people over-flown.
Wisborough Green	Noise/ increased volume and frequency of flights / impact from low flying aircraft
Area boundaries of Bidborough, Chiddingstone, Dormansland, Hever, Leigh, Penshurst, Sevenoaks Weald and Speldhurst Parish Council	Impact of residents

Other comments included

- That the proposal for the centre of a flight path over Langton Green, Spelthurst, Rusthall and Bidborough would be unacceptable as it would result in many thousands of people being blighted by noise
- Complaints about the ADNID trial
- That some people will particularly suffer given concentration of flight paths

- No meaningful evidence was presented in terms of assessing environmental impact as a consequence of the proposals. Heathrow Airport Limited (HAL) asked about specific AQ and Climate Change analysis GAL undertook to support paragraph 7.11 in the consultation document. This paragraph stated that changes to RWY08 Departures will have a negligible CO2 impact. HAL mentioned that there was no reference to any report or findings to substantiate this
- That local people would not benefit from the proposals
- Criticism of GAL's communication and how it has dealt with queries
- Opposition to a narrow Point Merge System for flight path arrivals

Endorsements:

A number of organisations endorsed the partial or full response of one or more other organisations. These included:

Stakeholder Organisation	Response Endorsed
Chiddingstone Parish Council Sundridge with Ide Hill Parish Council Chiddingstone Church of England School Chiddingstone Castle	HWCAAG
Lingfield Parish Council	Edenbridge Town Council
Speldhurst Parish Council	Penshurst Parish Council
Dormansland Parish Council Newdigate Parish Council CPRE Aviation Group Cllr Helen Clack, Surrey County Council	GACC
Gregory Barker MP	Charles Hendry MP
Tonbridge and Malling Borough Council	Kent County Council
Cllr Alison Cook, Seven Oaks District Council	Leigh Parish Council
Penshurst CE Primary School Hildenborough Parish Council	Tunbridge Wells Borough Council
Waverley Borough Council	GATCOM
Hildenborough Parish Council	Chiddingstone Parish Council

Other comments included:

- British Airways welcomed the introduction of Performance Based Navigation (PBN) as the basis for the design of departure and arrival routes with the aim to improve the safety and efficiency of operations at and around airports.
- Natural England were satisfied that the proposed options did not present a significant change to low altitude air traffic already experienced from within the affected protected landscapes, and as such are not likely to significantly impact on the special qualities for which they are designated.

Suggestions

Stakeholder organisations made a number of suggestions. These are briefly summarised below and included:

- That there should be a policy that offers maximum respite for all communities and individuals affected, and is based upon geography rather than size of population.
- That airports and airlines must enable improvements to reduce aircraft noise.
- Rather than making best use of the runway, one stakeholder organisation considered that the objective of the review must be to balance efficiencies with reducing the number of people and businesses significantly affected by aviation noise, and the impacts on those people and businesses that will remain affected.
- Another stakeholder organisation said that Gatwick Airport is big enough, and that the region cannot take any more flights without a very detrimental effect on people and the environment.
- Avocation of the introduction of a policy that offers maximum respite for all communities and individuals affected. The effect of differing noise levels resulting from the distance from the airport should be factored in rather than just considering the size of populations.
- Introduction of a regulatory discipline to control noise and disturbance to include: minimum height restrictions for aircraft preparing to land; significant and effective financial penalties for noise-related incidents, so that unnecessary noise from low flying aircraft is reduced to a minimum; the adoption of noise measurement standards to replace noise averaging; cessation of night flights; and a national policy within the UK whereby all Airbus 320 series of aircraft are retrospectively fitted with equipment to reduce their noise.
- Whatever the outcome of London airspace changes there will be many voices raised in concern so it is preferable to present a solution that is understood without any, or few, variables. This also applies to heights at which aircraft are vectored away as some are at 3,000ft and others at 4,000ft and are also dependent on the time within the 24 hour cycle. The departure heights on NPRs should be uniform and, preferably higher than they are currently (particularly at 3,000ft). As the heights have been lower partly due to Heathrow departures, where the departing aircraft must also be capable of climbing faster, there should therefore be sufficient leeway to raise the height of Gatwick departures now. As suggested earlier, with aircraft achieving vectoring heights more quickly, care needs to be taken not to 'cut corners' and affect those who were not previously affected by departing aircraft.
- A need for a mechanism to provide financial compensation to owners of dwellings not previously over-flown.

Comments about the consultation

A number of the stakeholder organisations made comments about the consultation. These comments included:

- That the consultation should be extended so that it is effect and compliant with CAA guidelines.
- That some questions were missing such as not having a question about specific point merge arrivals corridors. *“The original consultation documentation did not show specific Point-Merge arrival corridors, showing only the existing broad swathes. The current consultation does not contain a specific question on this. We feel this is a considerable deficiency in the consultation process.”* Tonbridge Civic Society.
- The consultation is a whitewash and/or biased or flawed.
- Concerns about the design of the consultation or questions asked (e.g. too vague/ complicated/ unfair/ inaccurate).
- A complaint about Ipsos MORI’s system not being able to accept responses.
- Concern that some of the routes referred to did not appear on the maps. And that it took time to download maps.
- Concern that the consultation was premature pending Government decision on additional runway capacity at Heathrow or Gatwick.
- Worries that there was insufficient weight afforded to AONBs and heritage assets.
- A view that the consultation did not meet all of the seven criteria that the HM Government Code of Practice on Consultation stipulated.

7.3 Members of the public

Response form

There were 2,066 members of the public who made additional comments and suggestions and/or comments beyond the scope of the consultation. These comments and suggestions are briefly summarised here and included comments about:

- **General flight paths and NPRs:** 1,290 members of the public made comments about flight paths and NPRs in general. A small number of these respondents provided supportive comments about flight path changes. But most respondents provided negative or critical comments. The main comments and concerns focussed on opposition to changes to flight paths and NPRs; concerns about impact on quality of life in general (457), and about changes to NPRs that would impact quality of life and sleep (352). Other concerns included that aircraft do not adhere to NPRs (54); and NPRs do not reflect a true picture of noise (51). Over 65 specific locations were mentioned as in need of being avoided. These included Tunbridge Wells (35); Horsham (25); and Crowborough. A further 242 respondents made comments that flights and existing flight paths impact on quality of life.
- **Noise:** 1,272 members of the public made general comments about noise. The main comments were centred around general concerns about aircraft noise (235); that noise would affect areas previously unaffected by noise (119); and opposition to increased aviation noise (105). Some 860 members of the public also made comments about existing aircraft noise, in terms that it has got worse (178), that it affects quality of life (178), and that it impacts the countryside (137). Many different areas were mentioned as being impacted by existing aircraft noise. Suggestions included that it should be reduced or kept to a minimum (103); that it should be reduced over populated areas (21); monitored (19); and that it should be taken into account as a primary factor when designing new flight paths and NPRs.
- **The local community:** 649 members of the public made comments about the local community. The main comments were that the proposed changes were not in the interest of local people, but in the commercial interests of Gatwick Airport (311). There were also 216 respondents who were concerned about the impacts of the proposals on the local community, including local schools. A large number of different areas were mentioned.
- **Night flights / respite:** 620 members of the public made comments and suggestions about night flights and respite. There were 35 respondents who supported night time respite, and 33 respondents said that respite in general was a good idea. Some respondents mentioned that respite would benefit their local area, including Tunbridge Wells (4) and Tonbridge (2). There were 384 respondents who provided negative or critical comments. These comments included that night flights and/or early morning flights impact quality of life and affect sleep (164); and general concerns about the impact of these flights (42).
- **Frequency and volume of flights:** 602 members of the public made comments about the frequency and volume of flights. This included 272 respondents who said that flights have increased recently; and 119 members of the public said they opposed any changes to the frequency or volume of flights. A large number of areas were mentioned as being affected by this, including Brockham (11), Langton Green (11), and South Holmwood (5). A total of 43 members of the public said that the volume and frequency of flights should be reduced.

- **Housing and property:** 594 members of the public raised concerns about the impact of aircraft and the proposals on property. There were 278 comments about the impact of the proposal on house prices. And there were concerns that the proposals would affect new areas and impact people who had paid a premium to avoid being blighted by aircraft (235). Specific areas included Betchworth (22), Brockham (14), and Horsham (13). There were 68 comments that compensation should be made to those who suffer from negative impacts.
- **Environment:** 399 members of the public made comments about the environment. Comments included concerns about the impact to air quality and pollution (177); and concerns about impact to the countryside, rural areas and AONBs (137); and general environmental impact (89). Other concerns included concerns about impact on cultural heritage (39); and impacts on wildlife and biodiversity (29).
- **Existing impacts:** 223 members of the public made comments about existing impacts, before any proposals are implemented. Comments included that flights are increasing recently (102); and night flights and/or early morning flights already impact the area (69). A number of suggestions were made to alleviate the impact of these flights, including that there should not be any night flights (53); that these flights should avoid residential areas (13); and that there should be penalties for airlines that breach night flight restrictions (12).
- **Aircraft in general:** 185 members of the public made comments about aircraft in general. These comments included concerns about older aircraft that are noisy (22) and/or being unable to reach 4,000ft in shortened NPRs (11). There were also a number of comments relating to aircraft in terms of modern aircraft being able to navigate more accurately (39); and are capable of steeper climbs and descents (28). Suggestions included that airlines should invest in quieter aircraft (53); and that quieter aircraft should be used (33).
- **Altitude:** 177 members of the public made comments about the altitude of aircraft. The main comment was about concerns over low flying aircraft for departures and/or arrivals (117). A number of different areas were mentioned including Tunbridge Wells (16) and Crowborough (14). There were also 36 comments that aircraft altitude has been decreasing recently.
- **Departures / arrivals:** 105 members of the public who made comments about general departures. These comments included concerns about the impact of aircraft noise relating to departures (36); opposition to new departure routes and changes to NPRs (34); and opposition to changes in the frequency of aircraft departures (10). 127 members of the public also made comments about general arrivals. These comments included concerns about aircraft noise from arrivals (20); and opposition to single flight paths (16). Suggestions included that arrivals should have a steeper approach (36); arrivals should be dispersed across a wide area (16); and that arrivals should maximise continuous decent approach (13).
- **The consultation:** 785 members of the public made comments about the consultation itself, including about the consultation document (635) and the consultation process itself (476). The main comments about the consultation document were that it was too long and/or confusing (386); and that it lacks detail which means more information would be required (268). Other less frequently cited comments about the consultation document included that maps were lacking in detail (73), were inaccurate (66), and complicated (26). There were also 156 respondents who were critical of the consultation questionnaire. In terms of the consultation process, there were

358 comments about the credibility of the consultation; and that the consultation was inadequate (146). Additionally, there were also 34 comments relating to problems with the consultation website.

- **Other comments:** these included that changes are not necessary (146); mentions of wind direction (41); concerns about safety (34); and that more research needs to be carried out before proposals are implemented (23).
- **Out of scope comments:** 316 members of the public made comments which were not related to the consultation, and as such, were categorised as out of scope. These included comments about a second runway at Gatwick Airport (132) and opposition to a second runway at the airport (111); comments about building a new airport in the Thames Estuary (59); and comments about under-used capacity at Gatwick Airport and/or other airports (36).

Unstructured responses from the public via email and post

There were 467 members of the public who responded by email or post who made additional comments and suggestions and/or comments beyond the scope of the consultation. These respondents did not use the consultation response form, and hence their responses are summarised here, separate to those who took part via the response form. These comments and suggestions are briefly summarised below:

- **Noise:** 407 members of the public made comments about noise. Comments included that previously unaffected areas would be blighted by noise if proposals went ahead (20). There were 307 members of the public who made comments relating to current aircraft noise.
- **Flight paths / NPRs:** 396 members of the public commented on flight paths and NPRs. The main concern was about the impact on quality of life (148). A large number of areas were mentioned, including Langton Green (6), Penshurst (5), Reigate (2), and Loxwood (2). 126 members of the public also made comments about how existing flight paths impact quality of life, with a number of different areas mentioned. 168 members of the public made suggestions about flight paths and NPRs. Most of these comments were about flight paths which should avoid areas, including the countryside (38); peaceful areas (14), and the Surrey Hills AONB (10).
- **Frequency and volume of flights:** 300 members of the public commented about the frequency and volume of flights. There were concerns about the frequency and volume of flights if proposals went ahead (119), and many different areas were cited. There were 25 comments made in opposition to any change in the frequency of aircraft. There were 50 members of the public who made comments about how they are affected by current flights – again, many different areas were mentioned. 175 members of the public made comments about the volume of flights having increased recently.
- **Comments about community and people:** 288 members of the public made comments about local communities and local people being affected by aircraft. Concerns raised included worries about local businesses and the tourism industry being affected, including Penshurst place (26), Hever/Hever Castle (21), and Chiddingstone Castle (18). There was also criticism that changes would be for the benefit of GAL, and not local people (143).
- **Comments about night flights / respite:** 233 members of the public commented about night flights and respite routes. There were a few positive comments about respite, but most comments

were negative or critical. Concerns included that night flights affect quality of life (41); opposition to night flights (23); and worries about the impact of night flights or early morning flights (22). Some 131 Members of the public also made comments about the impact of existing night flights. The main comment was about concerns that the number of night flights had increased. Other comments included concerns about the impact of night flights on many different locations, including Speldhurst (9), Rusper (5), and Beare Green (4).

- **Housing and property:** 206 members of the public made comments about property being impacted. Concerns raised included impact on people who had paid a premium to avoid aircraft noise (28). Others mentioned that compensation would be inadequate (37); and that noise insulation and double-glazing is insufficient (15).
- **Environment:** 195 members of the public were concerned about environmental impact. Comments included concern about air quality and pollution (98); impact to the countryside, rural areas, and AONBs (68); concerns about impact to wildlife and biodiversity (26); and that nature reserves, National Parks, SSSIs and SPAs would be affected (13).
- **General comments about altitude:** 171 members of the public made comments about altitude of aircraft. The main comment related to concerns about low flying aircraft (68). A large number of different areas were cited as being impacted. There were also 119 respondents who made comments about aircraft flying at lower altitudes than before. Areas mentioned as being affected included Coldharbour (9), Crowborough (7) and Tunbridge Wells.
- **General comments about aircraft:** 49 members of the public made general comments about aircraft. Comments included that older aircraft are louder and create more noise (5) and that modern aircraft do not climb more quickly because of a desire to save fuel (2). The main suggestion was that airlines should invest in quieter aircraft and /or be fitted with noise reduction equipment (23).
- **General comments about departures / arrivals:** 21 members of the public made general comments about departures, and 84 members of the public made general comments about arrivals. The main comments about departures related to opposition to changes to departure routes; and concerns about impact of aircraft noise (6). For those who made comments about arrivals, the main comments were negative or critical and included opposition to single flight paths (33); opposition to point merge (17); and concerns about noise (11). A number of suggestions were made, including that arrivals should have a steeper approach (10); arrivals should maximise continuous descent approach (9); and that arrivals should be spread as widely as possible (5).
- **The Consultation:** Some members of the public made comments about the consultation document (211), and the consultation process (183). The main comments about the document were that it was too long, complicated, or confusing (152), and that it was lacking in detail (80). There were also 45 comments that the document was misleading, contradictory, or flawed. In terms of the consultation process, comments again were critical. There were 147 comments that the consultation was flawed and lacked credibility. Other comments included that it was inadequate, with additional consultation and/or independent review being necessary (66); and that it divides communities (11). There were also 64 members of the public who were critical of the consultation questionnaire.

- **Other general comments:** 201 members of the public made other comments. These comments included that changes are not necessary (62); mentions of a super highway or motorway in the sky (59); and endorsements of local authority, parish and town councils' responses – Tunbridge Wells/Tonbridge/Capel/Penshurst/Alford/Edenbridge (21).
- **Out of scope comments:** 131 members of the public made comments and suggestions beyond the scope of the consultation. These comments included general mentions of a second runway at Gatwick Airport (75); opposition towards a second runway at Gatwick Airport (53); and mentions of developing other airports, including a new airport in the Thames Estuary (34).

8. Organised campaigns

8.1 Overview

This chapter provides a summary of each of the organised campaigns that were received as part of responses to the consultation. Overall, Ipsos MORI received **3,212** campaign responses from 11 different campaigns listed in Table 8.1 below. Some of the campaign responses consisted of slight variations - these variations have been listed out separately under the main campaign heading if/as applicable.

Please note that the name assigned to each campaign was done so based on either the name of the campaign or, if this was unclear, a name was assigned by Ipsos MORI based on campaign content.

A number of those who sent generic campaign responses also provided additional, bespoke comments. These comments have been analysed and included in the commentary alongside each campaign summary in this chapter.

Table 8.1 Organised campaign responses submitted as part of the Gatwick Local Area Consultation

		Total Responses	Email and Post	Online
Campaign 1	Planes Over Penshurst	1,347	1,338	9
	Map 1 - Chiddingstone	271	271	0
	Map 2 - Penshurst	595	595	0
	Map 3 - Broad Swathe	481	472	9
Campaign 2	CAGNE	1,223	271	952
	CAGNE	569	33	536
	CAGNE East	632	216	416
	CAGNE – Requested not to be part of campaign	22	22	0
Campaign 3	Gatwick Obviously Not	193	193	0
	Formal Complaint to CAA	181	181	0
	Delivery Discussion Paper	12	12	0
Campaign 4	London Airspace Change	155	149	6
	Penshurst Part 1	41	38	3
	Penshurst Part 2	35	35	0
	Chiddingstone	56	53	3
	Bidborough	23	23	0
Campaign 5	Betchworth / Brockham Parish Council	118	0	118
Campaign 6	Broad Swathe from the East	51	49	2
Campaign 7	Penshurst Parish Council Campaign	44	2	42
Campaign 8	The RWY08 Route	38	37	1
Campaign 9	Flights, Nights, Heights	16	16	0
Campaign 10	Hartfield Campaign	15	13	2
Campaign 11	Increased flights over Chiddingstone, Hever and Penshurst Campaign	12	12	0
Total		3,212	2,080	1,132

8.2 Campaign Summaries

The summary of each campaign received has been set out in order of the number of responses received.

8.2.1 Planes over Peshurst (1,347 responses overall)

In total Ipsos MORI received 1,347 Planes over Peshurst campaign responses. Three very slight variations of this campaign were received.

i) Planes Over Peshurst – Map 1 Chiddingstone (271 responses)

The campaign did not support any of the proposals, instead supporting a broad swathe approach as advocated by Tunbridge Wells Borough Council. The campaign also endorsed part of Peshurst Parish Council's response which was: *"It would be grossly unfair on those whose lives would be devastated with a continuous stream of overhead flights from a Point Merge when they previously had the substantial relief from the tactically vectored flight paths across a broad swathe. The current system is a proven, safe and a fairer distribution of incoming flights..."*

The campaign was concerned that a proposed narrow flight approach to RWY26 and the narrow 'superhighway' for RWY08 would mean that there would be no respite at all for locations such as Peshurst, Leigh, Groomsbridge, Chiddingstone and Hever. It suggested that a heritage corridor to the east of East Grinstead to include Groombridge Place, Peshurst Place, Chiddingstone Castle, and Hever Castle should be considered as a designated "Noise Sensitive Area". Map 28a outlining the 500m potential NPR width for RWY08 option, with text indicating the locations of Chiddingstone, Leigh and Peshurst was provided to support these comments, as was a map outlining the potential "Noise Sensitive Area".

ii) Planes over Peshurst – Map 2 Peshurst (595 responses)

The second variation of the "Planes over Peshurst" campaign was identical to the first (Map 1 Chiddingstone), but with a slight variation of Map 28a and there was no map outlining the proposed "Noise Sensitive Area".

Some respondents added additional comments alongside both the Map 1 and Map 2 variations of this campaign. These included opposition to the proposed single entry / point merge system (2 comments); opposition to further night time or early morning flights (2); comments about the current experience, including five comments about the effect of night time and early morning flights, particularly over Peshurst (4) and four comments about impacts on quality of life. It was suggested that airlines should invest in quieter aircraft or fitting noise reducing technologies (4), concern about the volume of flights (9). A total of 19 comments complained about the impact of noise in general.

iii) Planes over Peshurst – Map 3 Broad Swathe (481 responses)

The third variation of the "Planes over Peshurst" campaign had all the contents of the first (Map 1 Chiddingstone), except for the exclusion of the map outlining the proposed "Noise Sensitive Area", and some additional text.

It was stated that the redesign of airspace over Gatwick was premature because it should form part of a holistic re-consideration of future air space changes at Heathrow Airport and Biggin Hill Airport. There were also suggestions that a direct route down the Thames Estuary could be a viable alternative, as well

as the adoption of a Continuous Descent Approach (CDA) that would start over the English Channel and would reduce noise impacts. There was opposition to the number of flights per hour.

Some respondents added additional comments. These included opposition to the proposed single entry / point merge system (8 comments), that the proposed respite options are insufficient (5) and concern about how changes to flight paths might impact on residents' quality of life in general (19), or in specific locations such as Langton Green (9). Twelve comments were critical of Gatwick Airport Ltd, including arguing that the proposed changes are motivated by the desire to increase profit. Others were concerned about the potential increase in the volume and frequency of flights (16), impact on local people and communities (14) noise over populated areas (8), on cultural and heritage sites (14) while 18 were concerned about the impact on rural areas.

8.2.2 CAGNE and CAGNE East campaign responses (1,223 responses overall)

i) CAGNE (591 responses)

CAGNE (Communities Against Noise and Emissions) provided a template response for those who shared their views on proposed flight path changes at Gatwick Airport. Of the 591 CAGNE campaign responses received, 22 responses, while being identical in their content, requested that they did not wish to be treated as part of the campaign.

The CAGNE campaign response as a whole disagreed with the introduction of any new flights paths and any new NPRs. It was stated that none of the six options presented would provide the best balance of benefits for RWY26 departures. It was also stated that the most important noise considerations when deciding on the best options for RWY26 departures heading to the south were quality of life, impacts on health and sleep, noise over populated areas and the potential effect of increased noise on houses.

A number of comments were made about NPRs, including:

- A preference for no changes, and that if changes did happen, then the NPR swathe should be as narrow as possible to minimise impact on those areas below the flight path.
- That GAL should definitely not seek changes to the current DfT noise abatement requirements for the proposed night time arrival respite route for RWY08, and that any changes to respite routes should take place within existing NPRs. The factors believed to be most important when considering if to seek changes were noise at night that disturbs sleep; over populated areas at night; impacts my health; and potential impact on house prices
- That GAL should definitely not seek to re-centre and narrow the published NPRs to take account of aircraft performance on the modern PBN routes. The campaign suggested that narrow swathes are unbearable for those living below them
- That NPRs should not be shortened. The most important factor to consider when determining whether to implement shortened NPRs was thought to be the effect on house prices. It was suggested that residents in elevated locations would be much closer than stated to flights and so would be negatively impacted. However, it was believed that the published NPR should be re-centred and narrowed to correct the anomaly of aircraft flying outside the NPR for the existing PBN route for RWY26 DVR/CLN/LAM departures; with any changes made within existing NPRs.

Other points made included that the map set for Appendices D1-D2 and that map E references to ADNID trial were unacceptable; that the impact of noise on the rural environment should be given greater recognition than the impact of noise on urban areas; and that the strongest considerations should be those previously mentioned in the response with the quality of life being the first consideration and the negative impact on housing being a major concern.

Some respondents added additional comments. These included; concerns about the impact of night time or early morning flights on populated areas (26 comments) or quality of life (29). Twenty six comments made expressed opposition to the proposed NPR changes. Six comments were critical of Gatwick Airport Ltd including arguing that the proposed changes were driven by the motivation for increased profit. Four were concerned about the impact on the local transport system, air quality and pollution (7).

ii) CAGNE East (632 responses)

CAGNE East was set up by concerned residents of Bidborough in Kent, to provide campaign support to a growing network of residents, communities, campaign groups, Parish Councils and NGOs who are concerned about Gatwick expansion. The campaign supported the proposed realignment for RWY08 departures to the east/northeast of Gatwick Airport with the caveat that only if the data provided by GAL that the number of people affected by noise would be reduced is indeed correct. Suggested factors for GAL to consider when proposing to realign RWY08 to the east and north east were noise that; affects health; at night that disturbs people's sleep; in the day that impacts quality of life, has an impact on schools and community facilities; has an impact over AONB, National Parks and historic houses and gardens.

The campaign argued against a single respite route for arrivals to RWY26. Instead it suggested that there should be multiple flight paths both day and night across a broad swathe – with the proviso that there would be no increase, and preferably a reduction, in the number of people affected by aircraft noise.

A number of points were made about proposals for NPRs and included:

- A neutral position was taken on the re-centring and narrowing the published NPRs to take account of aircraft performance on the modern PBN routes. However it was stated that if narrowing the NPR swathes would lead to a higher concentration of noise for a minority of residents, then the proposals should not go ahead.
- That NPR swathes should indicate noise impacts from over-flights of nearby areas.
- The campaign disagreed that NPRs should be shortened, but agreed that GAL should consider NPR swathes with variable widths. The campaign supported the most practical NPR width that would cause least disturbance.

There was concern that the proposed flight path for RWY26 would lead to the overflight of many village primary schools (in Bidborough, Langton Green, Speldhurst, Fordcombe, Penshurst, Chiddingstone and Hever). It was also stated that proposals would lead to negative impacts for tourist attractions such as Hever Castle, Chiddingstone Castle and Penshurst Place, and that GAL had not taken into account how the proposals would impact on tourism in West Kent.

The campaign suggested that with the benefits of precision navigation it would be possible to 'spread the load over many routes' to ensure minimal disturbance to all. Additionally they would like to see policies to get steeper descent angles and point merge over the sea.

The fairness of the consultation was called into question because that specific point merge arrival corridors have not been shown in the documentation.

Some respondents added additional comments. These included; concerns about night and early morning flights (49 comments), particularly on quality of life; concern about the number of people who might be affected by the proposed NPR changes (25), especially their impact on quality of life (22). It was suggested that NPR swathes should indicate potential noise impacts from over-flight (41). Other concerns included: the impact on local businesses and tourist industry (7), including locations such as Hever Castle and Penshurst Place; impacts on the local community (15), cultural heritage (42) local infrastructure (42), rural areas (49) and protected environmentally designated areas (41).

8.2.3 Gatwick Obviously Not – Formal Complaint to the CAA (181 responses)

This campaign was sent to the Consultation email address and to the Civil Aviation Authority's airspace policy email address (airspace.policy@caa.co.uk).

This campaign response was a formal complaint to the CAA arguing that the consultation was not compliant with the criteria outlined in the Airspace Change Process (ACP) documentation. The letter quoted the ACP, specifically 'Stage 3 (Preparing for the consultation)'. The following reasons were given to support the assertion that consultation did not meet the HM Government Code of Practice for consultation:

- No clear proposals or their impacts had been outlined in the consultation. As such, it was mentioned that there would be no ability to influence the outcome of the proposals.
- The consultation should have been extended as the ability for some people to reply to it was impacted by the end date falling within the summer holidays.
- The proposed changes were obscured by technical language, making the proposals difficult to understand. Furthermore it was believed that the proposed changes were not clearly outlined and that no justification was given to them. It was also suggested that the response scales negatively impacts the ability of stakeholders to influence changes.
- That stakeholders had not been consulted adequately. It was suggested that this includes a lack of consultation in communities which would be impacted by the proposals.
- It was suggested that the information was vague and inadequate making it difficult for any respondent to respond meaningfully.

The response concluded with the following statement:

"I would like to ask for your reassurance that the points that I have raised above will be taken into account if the GASC ends on 14th August 2014 and GAL submits their proposals using the results of their existing online consultation, during Stage 5 of the Airspace Consultation Process, the Regulatory Decision, as you indicate that if the appropriate level of consultation has not taken place this will be taken into account during the decision whether to implement the proposals submitted by GAL."

Gatwick Obviously Not also produced a response to the Airports Commission's Discussion Paper 07 – Delivery of New Runway Capacity July 2014. Twelve copies of this were received by Ipsos MORI and it has been appended to this report along with further campaign responses, but not commented on in this section as it is considered to fall outside the scope of this consultation.

Some respondents added additional comments. These included; support for respite (1 comment) and the suggestion that this could be helped by the provision of more routes for night time and early morning flights (1); and reporting of increased night time and early morning flights (1).

8.2.4 London Airspace Change (155 responses overall)

There were several variations of this campaign response which Ipsos MORI believes may have originated from a letter published on the Chiddingstone Parish Council website.

i) Chiddingstone Parish Council full campaign response (91 responses)

The campaign stated that none of the proposals outlined would be supported. However, the broad swathe approach advocated by Tunbridge Wells Borough Council was supported. The campaign also endorsed Chiddingstone Parish Council's response about multiple respite routes being necessary to provide relief to those people over-flown. A sub-set of this campaign differed only in that the text referred to 'the parish council' rather than Chiddingstone Parish Council.

Some respondents added additional comments. These included; the suggestion that arrivals should maximise continuous decent approaches (1 comment); opposition to night time and early morning flights (2); concern about their frequency (2) and the impact these flights have on quality of life (2) and local communities (3).

ii) Penshurst Parish Council additional comment (38 responses)

This variation of the Chiddingstone Parish Council's response again stated that none of the proposals would be supported and that instead, the broad swathe approach outlined by Tunbridge Wells Borough Council was favoured. However, unlike the full campaign response, it did not support for Chiddingstone Parish Council's response, instead there was an endorsement of Penshurst Parish Council's response.

Some respondents added additional comments. These included; opposition to single entry / point merge flight control system (3 comments); references to the current impact of flights on quality of life (2) in Fordcombe (1) and Penshurst (1).

iii) Concern about the narrowing of RWY26 swathe (23 responses)

This variation of the Chiddingstone Parish Council's response again stated that none of the proposals would be supported, but that instead the broad swathe approach outlined by Tunbridge Wells Borough Council was favoured.

This variation did not explicitly state support of Chiddingstone Parish Council's response. Instead, concern about the proposal to narrow the current swathe which arrivals for RWY26 are channelled was raised. It also argued that it would be 'unjust' to concentrate flights over any community and that all communities should continue to share the burden of overflight.

8.2.5 Betchworth Village campaign (118 responses)

This campaign stated that Betchworth is a peaceful village that would be disproportionately impacted on by the increased noise due to its quiet background noise. There were no additional comments made.

8.2.6 Broad swathe from the east campaign (51 responses)

This campaign expressed support for the broad swathe approach for flight paths into Gatwick Airport from the east, rather than the proposals, which were described as 'super highways'. It was suggested that the consultation was difficult to understand, and that both it and the proposals were 'grossly unjust'.

Some respondents added additional comments. These included; support for spreading arrivals to avoid concentrating negative impacts (1 comment) and concerns about the number of people affected by the proposed NPR changes (1).

8.2.7 Penshurst PC campaign (44 responses)

This campaign favoured the continuation of the broad swathe approach for arrivals into Gatwick Airport as it was believed that the proposal to re-centre and narrow the flight path would be unfair on those over-flown. Respite options for night time flights were also favoured.

8.2.8 The Runway 08 Route (38 responses)

This campaign supported the abolition of the LAM route, as well as supporting the concentration of flight paths. It opposed proposals for respite routes.

Gatwick Airport's proposal for the removal of the LAM route was supported as the campaign believed that it was outdated, and had it had been superseded by DVR/BIG/CLN. Other reasons given for the supporting the abolition of the LAM route included that north east flight paths that they believed would have over-flown significant areas of the Kent AONB and elevated areas within the south east would not be utilised; that these proposals will avoid a number of National Trust properties in Kent, that may have otherwise been over-flown; and that a considerable number of geese, swans and other birds in the south side of Kent AONB and in Sevenoaks Wild Life Reserve that may have also been impacted upon. Under proposals put forward in the London Airspace Consultation, would be avoided

It was also suggested that previously proposed flight paths, in the London Airspace Consultation, would have impacted upon National Trails and recreational paths, which the campaign suggested would have had significant impacts on the air quality of the Kent Downs.

The campaign opposed night time respite flight paths for RWY26 as it was suggested that this would impact unfairly on those not already over-flown. It stated that while it would offer respite to those who are currently over-flown, these people are used to flights and their house prices factored in the disruption. However, respite routes over areas not presently experiencing over-flown would lead to loss of quality of life and house price values in areas such as Cowden and Penshurst.

The proposal to take advantage of satellite navigation to narrow, shorten, and concentrate flight paths was supported as it was believed that fewer additional people would be impacted if flight paths were concentrated.

Some respondents added additional comments. These included; opposition to the respite proposals (2 comments); concerns about the number of people potential adversely affected by changes to NPRs (3);

that NPRs should avoid rural areas (4), concerns about the impacts on rural areas in general (6), impacts on businesses in Sevenoaks (4), impacts on cultural heritage (5) and the frequency of flights over Sevenoaks (4).

8.2.9 Flights, Nights, Heights (16 responses)

This campaign was concerned about proposals to change arrivals to a 'single narrow superhighway corridor'. It worried that the consequences would be many more people being over-flown; that property prices would be impacted; and that no compensation would be received.

There was concern that the actual route of flight paths was not shown, and this had created uncertainty, and that the consultation document was too complex and designed to put people off completing it.

Concern was expressed about the current perceived impact of emissions of air flight on Ashdown Forest. It was believed that more research should be carried out looking at this issue and that Ashdown Forest should not be over-flown at all, due to perceived impact of overflight on flora and fauna. The campaign set out a series of suggestions which included:

- GAL should avoid implementing proposals which have not been properly evaluated. It was suggested that research should be carried out to understand the impacts of proposed changes before any actual changes are made.
- A multi-path point merge system should be used over the coast rather than a 'single narrow corridor'.
- Planes should fly higher for longer, and be subject to financial penalties if they don't comply.
- Adoption of continuous flight descent
- That night time flights are limited and eventually banned

The responses concluded with a statement that summarised the views on the consultation and proposal:

"It is difficult to think of a situation where there is so little protection over what should be a fundamental human right to a relatively peaceful existence. These changes will be imposing intolerable conditions on potentially tens of thousands of people who currently don't experience major aircraft noise issues. With minimal non transparent consultation and lack of research both Gatwick and Government need to abandon the single flight path arrival option."

Some respondents added additional comments. These included; concern about the impact of night time and early morning flights (1 comment) or day time flights (1) on quality of life; a suggestion that flights should be ceased between certain hours of the night (1) and concerns about low flying aircraft over Nutfield (1) and Crowborough (1).

8.2.10 Hartfield campaign (15 responses)

This campaign objected to the proposed changes to the NPR for departing flights and the 'joining' point for RWY26 night time arrivals.

It was believed that changes to the joining point criteria for RWY26 night time flights would result in aircraft being brought into the final approach prior to 10 nautical miles from touch down. It was perceived that this would cause aircraft to pass over homes at low altitudes and, as a result, have a potentially significant impact on the health of the local communities and property prices.

There was concern over the way proposed changes to the NPR were presented as departing flights and their tracks which are believed to have a noise impact on the ground, but were not indicated in the published swathe parameters. It was believed that this would set a precedent for future changes.

In both cases there was concern that the proposals were in contravention of government policy, namely Section 78 of the Civil Aviation Act of 1982. It was suggested that any changes to the NPR and joining point should be consulted on by DfT and not Gatwick Airport.

No respondents provided additional comments with their campaign response.

8.2.11 Increased flights over Chiddingstone, Hever and Penshurst campaign (12 responses)

This campaign objected to the proposals because of the perceived impact on the AONB areas of Chiddingstone, Hever, Penshurst, surrounding villages and areas. It was suggested that the proposed changes could be ruinous to these areas due to the impact that the proposed changes could have on tourist attractions and tourism within the area. It was stated that concentrating flights over the communities would be unacceptable and that flight paths should be spread across a wider area as at present.

Glossary of Terms

Glossary of Terms

ADNID Trial	<p>Gatwick Airport ran a six month trial of a departure route called 'ADNID'. This trial ended on 8 August 2014 and all departing flights from Gatwick have now reverted to standard routings.</p> <p>The ADNID route, which was trialled on westerly departures from Gatwick, has been tested to gather data as part of wider work looking at how to use UK airspace more effectively and efficiently, as well as how to make the most of Gatwick's single runway capacity.</p>
Area of Outstanding Natural Beauty (AONB)	An area of countryside in England, Wales or Northern Ireland that is designated under the National Parks and Access to the Countryside Act of 1949 if its natural beauty and distinct character are deemed of sufficient value.
CAA	Civil Aviation Authority
CAP725	CAA Airspace Change Process Guidance document
Campaign	An organised action group within which two or more individuals responded with an identical or similar response.
CDA	Continuous Descent Approach
Coding	The process whereby responses are categorised by themes.
Consultation Document	The document published in April 2014 entitled ' <i>A Second Runaway for Gatwick</i> '. It outlines the purpose of the consultation, the runaway options, and how to respond.
DfT	Department for Transport
Direct airport related employment	Employment directly for employers with a specific reason to locate on or around the airport.
FAS	Future Airspace Strategy – a strategy developed between the CAA and the UK's aviation industry to achieve a number of efficiencies in the airspace system over the UK, encompassing advancing aviation and aircraft technologies.
GA	General Aviation
GAL	Gatwick Airport Ltd
Ipsos MORI	The organisation who independently received, analysed and reported on the consultation responses.
LAMP	London Airspace Management Programme
PBN	Performance Based Navigation
RNAV-1	A navigation standard, part of the Performance Based Navigation (PBN) system

NATS	NATS is a public private partnership, which provides air traffic control services to aircraft arriving and departing Gatwick and other UK airports
Noise exposure contour or Noise contour	A graphical depiction of areas exposed to a given noise level.
NPR	Noise Preferential Route
NPR Swathe	A DfT defined lateral and vertical area around an NPR that indicates the limits to which departing aircraft below 4,000ft are considered to be accurately adhering to the NPR
Online response form	Online response – any response submitted using the online response form.
Organisation or group	An establishment who responded on behalf of a group of people.
Performance Based Navigation (PBN)	PBN is a generic term for modern navigation standards
Point Merge	A system for organising arrivals into an efficient sequence from an initial arc shaped route
P-RNAV	P-RNAV is a further development of Basic Area Navigation (B-RNAV). It is being implemented in Terminal airspace to obtain the increased operating capability and environmental benefits arising from route flexibility.
Respite Route	Additional routes established to spread traffic in a predictable way, so that areas beneath the original track get predictable periods of respite
Route	A published route which an aircraft plans to follow
Runway 08 (RWY08)	The name given to the main runway at Gatwick when operating in a 'easterly' direction (i.e. taking off and landing on the easterly heading of 080°)
Runway 26 (RWY26)	The name given to the main runway at Gatwick when operating in a 'westerly' direction (i.e. taking off and landing on the easterly heading of 260°)
SIDs	Standard Instrument Departures (SIDs). A route for aircraft to follow straight after take-off as specified in the UK's Aeronautical Information Publication www.ais.co.uk
Site of Special Scientific Interest (SSSI)	A protected conservation area of the best wildlife and geological sites. Natural England identifies and protects them.
Special Area of Conservation (SAC)	Sites strictly protected chosen by the EC Habitat's Directive to conserve habitats and species.
Stakeholder organisations	Those who responded on behalf of an organisation or group.
VFR	Visual Flight Rules