



17 December 2015

Response to the CAA's report of November 2015 in respect of the introduction of PBN for Gatwick Departures

Summary

1. We welcome the decision of the CAA to require Gatwick Airport Limited (GAL) to change the westerly departure route (Route 4) and call for this to be implemented rapidly so that residents do not have to suffer the noise for another summer.
2. We are, however, dismayed at their decision in respect of Route 3. The fact that many more people are significantly affected by the change appears to have been entirely ignored
3. We have considerable doubts as to some of the methodologies employed to reach both these decisions.

The methodologies used

- 1 At no stage of the PIR process has the CAA considered noise actually measured on the ground. All their findings about noise have been based on theoretical models. We believe that this methodology may (in part) account for the considerable difference between what people are actually suffering and the CAA's apparent views as to what they are experiencing.
- 2 The above failure to measure noise is compounded by the CAA's selective interpretation of the Government's Aviation Policy Framework. (See paragraph 4.37.) This interpretation provides their reasoning for stating that the environmental effect of the changes they authorised in August 2013 has not been significant.

Their choice of the 57dB LA_{Eq 16 hour} test set out in paragraph 3.17 of the APF combined with the unrelated noise test set out in paragraph 3.39 sets a high bar which greatly reduces the chances of noise which actually is significant being treated as significant by the CAA.

Route 4

- 1 Although we are pleased that the CAA accepts that, under plans they originally approved, a large quantity of aircraft have been flying outside a long



established NPR swathe since May 2014, we cannot understand why – as appears to be the case – the CAA is so relaxed about long suffering residents having to put up with another summer season (i.e. when windows and doors are open and when flights are at their most frequent) in which the NPR is regularly flouted. We think that to allow another season of stress caused by excessive aircraft noise in a once tranquil environment would be both unacceptable and unnecessary.

- 2 The changes the CAA have asked for should therefore be completed in the shortest possible time and ideally before the 2016 summer season starts in April. We are aware that, following discussions with the CAA, GAL has produced a revised design that is expected to take the route back inside the established NPR and we understand that the CAA requires this to be tested in simulators for both Boeing and Airbus. However, we do not know when this work will take place.

Also, whilst we know that approval from the CAA will be required after the simulation work and that there is then a 2 month period that has to elapse before implementation, we do not know how long this is expected to take.

It would be logical and helpful if the CAA and Gatwick were to collaborate and let local community groups see a draft timetable which would progress from today's currently unsatisfactory position, via consultation with the public, to a new route being in place.

- 3 Nonetheless, we understand that it is likely that the new route within the NPR will benefit from only a limited degree of lateral dispersal. We believe that on balance an element of dispersal (similar to that which existed prior to the changes) would benefit the communities who live under or close to the flight paths.

The main reason for the new route being concentrated seems to be that the CAA and Gatwick are agreed on an industry-friendly interpretation of government policy. We do not accept that interpretation.

Further, we support all efforts to change government policy, so that it is accepted that there should be a fair and equitable lateral dispersal of aircraft both arriving and departing.

Route 3

- 1 As we say above, we are dismayed by the CAA's conclusion that the easterly departure route does not need to be changed.
- 2 Their reasoning here seems to be that outlined above - that their modelling does not indicate that the flightpath changes have made any previously quiet



locations noisier, and even if they have, these locations are not significantly noisier. This erroneous reasoning is compounded by the methodology used to analyse the sources of noise complaints; here, the CAA simply made the decision not to associate any complaints arising in the Reigate and Redhill area with Route 3 flights. Given the increased number of complaints from this area since May 2014, this is perverse.

- 3 That there should be an increased number of complaints from this area is only to be expected. The new route affects more people significantly than the old one did partly because it is more concentrated (as the CAA accept – see para 9.33) and partly because more flights are flying closer to Reigate and Redhill.
- 4 So we urge the CAA to revisit their conclusions.