

8 August 2014
FOIA reference: F0002024

Dear XXXX

I am writing in respect of your recent request of 5 August 2014, for the release of information held by the Civil Aviation Authority (CAA).

Your request:

"I am told that in 2012 Gatwick Airport undertook a public consultation into airspace changes. I am told this consultation resulted in the airport being given permission to introduce new flight paths outside the agreed Noise Preferential Routes (NPRs) that have existed since the 1960s.

My request is for the detailed response statistics showing the exact numbers of individuals, groups, and organisations responding to that public consultation".

Our response:

Having considered your request in line with the provisions of the Freedom of Information Act 2000 (FOIA), we are pleased to be able to provide the information below.

As part of the Airspace Change Process, Gatwick Airport undertook a stakeholder consultation associated with the implementation of RNAV Standard Instrument Departure Routes. A summary of the consultation feedback was subsequently published by the airport on its website. A copy of the report is attached.

It is important to note that the Airspace Change Process requires a stakeholder consultation, whereby the sponsor identifies representative organisations, rather than a public consultation. However, the sponsor is required to publicise the consultation to allow members of the public to participate in the consultation.

If you are not satisfied with how we have dealt with your request in the first instance you should approach the CAA in writing at:-

Mark Stevens
External Response Manager
Civil Aviation Authority
Aviation House
Gatwick Airport South
West Sussex
RH6 0YR

mark.stevens@caa.co.uk

The CAA has a formal internal review process for dealing with appeals or complaints in connection with Freedom of Information requests. The key steps in this process are set in the attachment.

Should you remain dissatisfied with the outcome you have a right under Section 50 of the Freedom of Information Act to appeal against the decision by contacting the Information Commissioner at:-

Information Commissioner's Office
FOI/EIR Complaints Resolution
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

www.ico.gov.uk/complaints.aspx

Should you wish to make further Freedom of Information requests, please use the e-form at <http://www.caa.co.uk/foi>.

Yours sincerely

Rick Chatfield
Information Rights and Enquiries Officer

CAA INTERNAL REVIEW & COMPLAINTS PROCEDURE

- The original case to which the appeal or complaint relates is identified and the case file is made available;
- The appeal or complaint is allocated to an Appeal Manager, the appeal is acknowledged and the details of the Appeal Manager are provided to the applicant;
- The Appeal Manager reviews the case to understand the nature of the appeal or complaint, reviews the actions and decisions taken in connection with the original case and takes account of any new information that may have been received. This will typically require contact with those persons involved in the original case and consultation with the CAA Legal Department;
- The Appeal Manager concludes the review and, after consultation with those involved with the case, and with the CAA Legal Department, agrees on the course of action to be taken;
- The Appeal Manager prepares the necessary response and collates any information to be provided to the applicant;
- The response and any necessary information is sent to the applicant, together with information about further rights of appeal to the Information Commissioners Office, including full contact details.

PRNAV Standard Instrument Departure Implementation at LGW

Consultation Feedback

Issue 1

Prepared by:
Gatwick Airport Limited

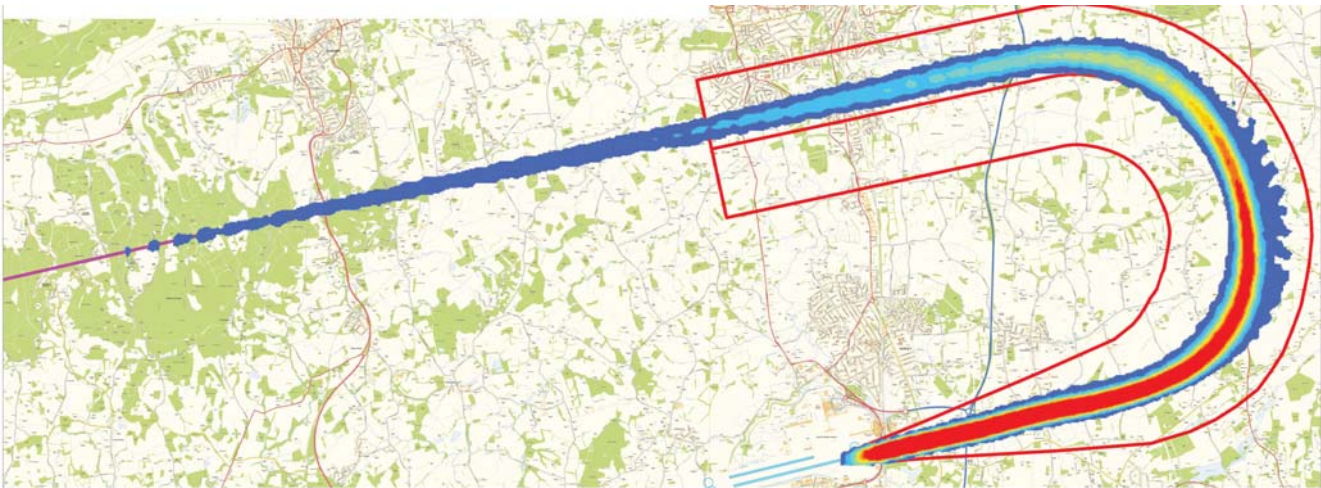


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1. Executive Summary

Gatwick Airport Limited (GAL) is currently developing an airspace change proposal (ACP) to replicate the current standard instrument departure routes (SIDs) from Gatwick Airport. The aim of this is to provide an airspace structure in line with modern aircraft navigational capabilities, with more accurately defined routes utilising the improved navigational capabilities of modern aircraft (Precision Area Navigation, P-RNAV). To allow for aircraft which are not yet PRNAV equipped the conventional SIDs will remain available until such time as the PRNAV equipage rate is close to 100%. This document provides feedback to all stakeholders who participated in the consultation. (Note the consultation document can be viewed at <http://www.gatwickairport.com/prnav/>)

The Consultation ran for a period of 13 weeks commencing on the 19th July 2012 and concluding on the 19th October 2012. Responses received after the 19th October up to the 12th November 2012, have also been included in the statistics and analysis. A minimum twelve week consultation period is recommended¹ in order to allow organisations to solicit feedback from their members, and to allow the proliferation of the consultation material. The consultation was initially distributed to a total of 32 stakeholder organisations. The list of stakeholders who were sent the consultation material is available in Appendix C of the consultation document. A further 46 stakeholders who were not on the original list also contributed.

In total 71 responses to the consultation were received. The sentiment of responses from those who responded are shown in Figures 2 and 3.

As a result of careful consideration of all the feedback, GAL will be proceeding with the proposed implementation of P-RNAV replications of the existing SIDs as described in the original consultation document. The airspace change proposal will be submitted to the CAA DAP for consideration.

In the event that a stakeholder wishes to present **new** evidence or data to the Director of Airspace Policy, for consideration prior to making his decision; the representative Organisation must submit the information in writing, to the following address:

The Director (ref Gatwick PRNAV SID replications)
Directorate of Airspace Policy
CAA House
45-59 Kingsway
London
WC2B 6TE

¹ <http://www.bis.gov.uk/files/file47158.pdf> Government Code of Practice for consultation.

2. Introduction

During July-October 2012, GAL conducted a consultation process soliciting feedback on proposals to modify the current SIDs from Gatwick Airport to use more accurately defined routes, utilising the improved navigational capabilities of modern aircraft (P-RNAV). This document provides feedback to stakeholders who participated in this Consultation exercise. It will be sent to all stakeholders who participated in the Consultation, and will be published on the GAL website at <http://www.gatwickairport.com/prnav/>.

This document should be read in conjunction with the Stakeholder Consultation document (available from the above website). All technical terms and acronyms are explained in full in the stakeholder consultation document.

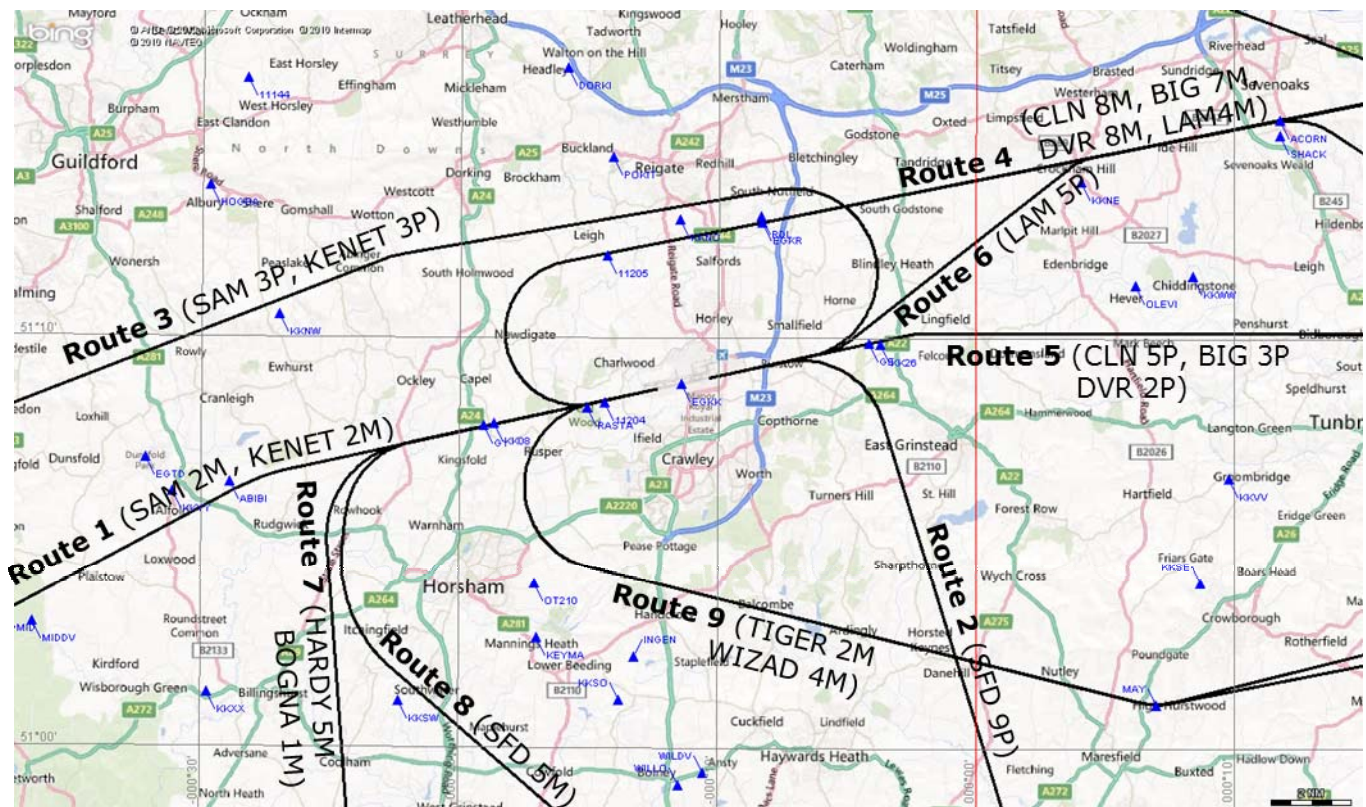


Figure 1 Map showing all of the SIDs proposed to be changed (current SID designators in brackets).

Figure 1 shows the routes which are the subject of the proposal. The route numbers shown correspond with the numbers used in the consultation material.

3. Overview of Responses

The consultation was launched through the Gatwick Airport consultative committee (GATCOM).

The organisations represented on GATCOM are:

East Sussex County Council	South London Business
Surrey County Council	Association of British Travel Agents
West Sussex County Council	Gatwick Diamond Business
Kent County Council	British Air Transport Association
Crawley Borough Council	Environmental and Amenity Groups
Horsham District Council	International Air Carriers' Association
Mid Sussex District Council	Which? Magazine
Mole Valley District Council	London Chamber of Commerce and Industry
Reigate and Banstead Borough Council	Passenger Representative
Tandridge District Council	Trades Union Congress S & E Regional Council
Horley Town Council	Coast to Capital Local Economic Partnership
Burstow Parish Council	Tourism South-East
Charlwood Parish Council	Gatwick Airline Operators Committee
Rusper Parish Council	Department for Transport's Representative:

The following Local Authorities were also sent the information:

Salfords and Sidlow Parish Council	Ockley Parish Council	Arlington Parish Council
Horley Town Council	Wotton Parish Council	Berwick Parish Council
Amberley Parish Council	Bletchingley Parish Council	Buxted Parish Council
Ashington Parish Council Ashurst:	Caterham Valley Parish Council	Chalvington with Ripe Parish Council
Billingshurst Parish Council	Chaldon Parish Council	Chiddingly Parish Council
Bramber PC	Dormansland Parish Council	Crowborough Town Council
Broadridge Heath Parish Council	Felbridge Parish Council	Cuckmere Valley Parish Council
Coldwaltham PC	Limpsfield Parish Council	Danehill Parish Council
Colgate Parish Council	Lingfield Parish Council	East Dean & Friston Parish Council
Cowfold Parish Council	Nutfield Parish Council	East Hoathly with Halland Parish Council
Henfield Parish Council	Outwood Parish Council	Fletching Parish Council
Itchingfield PC	Oxted Parish Council	Forest Row Parish Council
Lower Beeding Parish	Tandridge Parish Council	Framfield Parish Council
North Horsham Parish Council	Tatsfield Parish Council	Frant Parish Council
Nuthurst Parish Council	Titsey parish meeting	Hadlow Down Parish Council
Parham PC	Warlingham Parish Council	Hailsham Town Council
Pulborough Parish Council	Woldingham Parish Council	Hartfield Parish Council
Rudgwick Parish Council	Addington Parish Council	Heathfield & Waldron Parish Council
Rusper PC	Aylesford Parish Council	Hellingly Parish Council
Shermanbury Parish Council	Borough Green Parish Council	Herstmonceux Parish Council
Shipley Parish Council	Birling Parish Council	Hoe Parish Council
Slinfold Parish Council	Burham Parish Council	Horam Parish Council
Southwater PC	Ditton Parish Council	Isfield Parish Council
Steyning PC	East Malling Parish Council	Laughton Parish Council
Storrington & Sullington PC	East Peckham Parish Council	Little Horsted Parish Meeting
Thakeham Parish Council	Hadlow Parish Council	Long Man Parish Council
Upper Beeding Parish Council	Hildenborough Parish Council	Maresfield Parish Council
Warnham Parish Council	Kings Hill Parish Council	Mayfield & Five Ashes Parish Council
Washington Parish Council	Leybourne Parish Council	Ninfield Parish Council
West Chiltington Parish Council	Mereworth Parish Council	Pevensey Parish Council
West Grinstead Parish	Offham Parish Council	Polegate Town Council
Wiston PC	Platt Parish Council	Rotherfield Parish Council
Woodmancote Parish Council	Plaxtol Parish Council	Selmeston Parish Meeting
Abinger Parish Council	Ryarsh Parish Council	Uckfield Town Council
Betchworth Parish Council	Snodland Town Council	Wadhurst Parish Council
Brockham Parish Council	Stansted Parish Council	Warbleton Parish Council
Buckland Parish Council	Trottscliffe Parish Council	Wartling Parish Council
Capel Parish Council	Wateringbury Parish Council	Westham Parish Council
Charlwood Parish Council	West Malling Parish Council	Willingdon & Jevington Parish Council
Headley Parish Council	Wouldham Parish Council	Withyham Parish Council
Holmwood Parish Council	West Peckham Parish Council	
Leigh Parish Council	Wrotham Parish Council	
Mickleham Parish Council	Alciston Parish Meeting	
Newdigate Parish Council	Alfriston Parish Council	

The list of consultation stakeholders targeted for the initial distribution of the consultation material was in was agreed in advance² with the CAA.

The consultation was open to everyone, and in order to maximise awareness a press release was issued to local media. This outlined what the consultation was about, the consultation process and the deadlines for feedback. GAL also contacted a number local authorities and parish councils notifying them of the consultation. The consultation material was publically available for download from the GAL website www.gatwickairport.com/prnav and from GATCOM's website, www.gatcom.org.uk.

GAL met with several representative groups to present PRNAV to communities around the airport and to give people the opportunity to ask questions and seek clarification. Meetings were held with GATCOM, Dormansland PC, Leigh PC, Capel PC, Felbridge PC, Domewood PC, East Grinstead TC.

A total of 32 stakeholders were contacted in the initial distribution of the consultation. A full list of these stakeholders is available on page 40 of the Consultation Document. In total 94 stakeholders were involved in the Consultation. 25 of the stakeholder organisations did not respond to the consultation. 69 stakeholders responded, of which 10 responses indicated a neutral position (no comment or no objection). 6 respondents said they supported the proposal and 53 had an objection to at least one of the routes (see Figure 2).

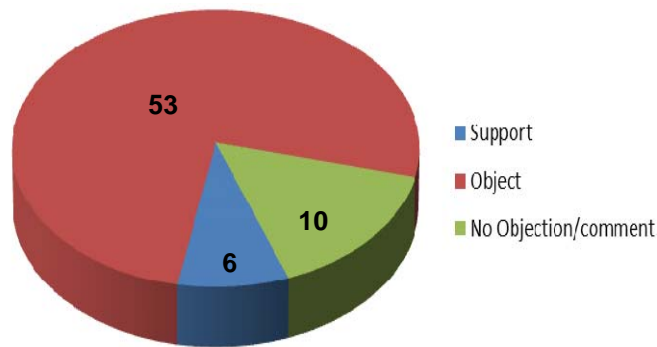


Figure 2. All stakeholders' responses pie chart

Figure 3 shows the breakdown of the responses to the individual routes. This shows that for seven of the routes there was little objection, the majority of the objections were specifically related to route 2.

² In accordance with the Future Airspace Strategy process agreed with the CAA. (Policy for the Application of Performance-based Navigation in UK_Irish Airspace - Signed 111013.pdf)

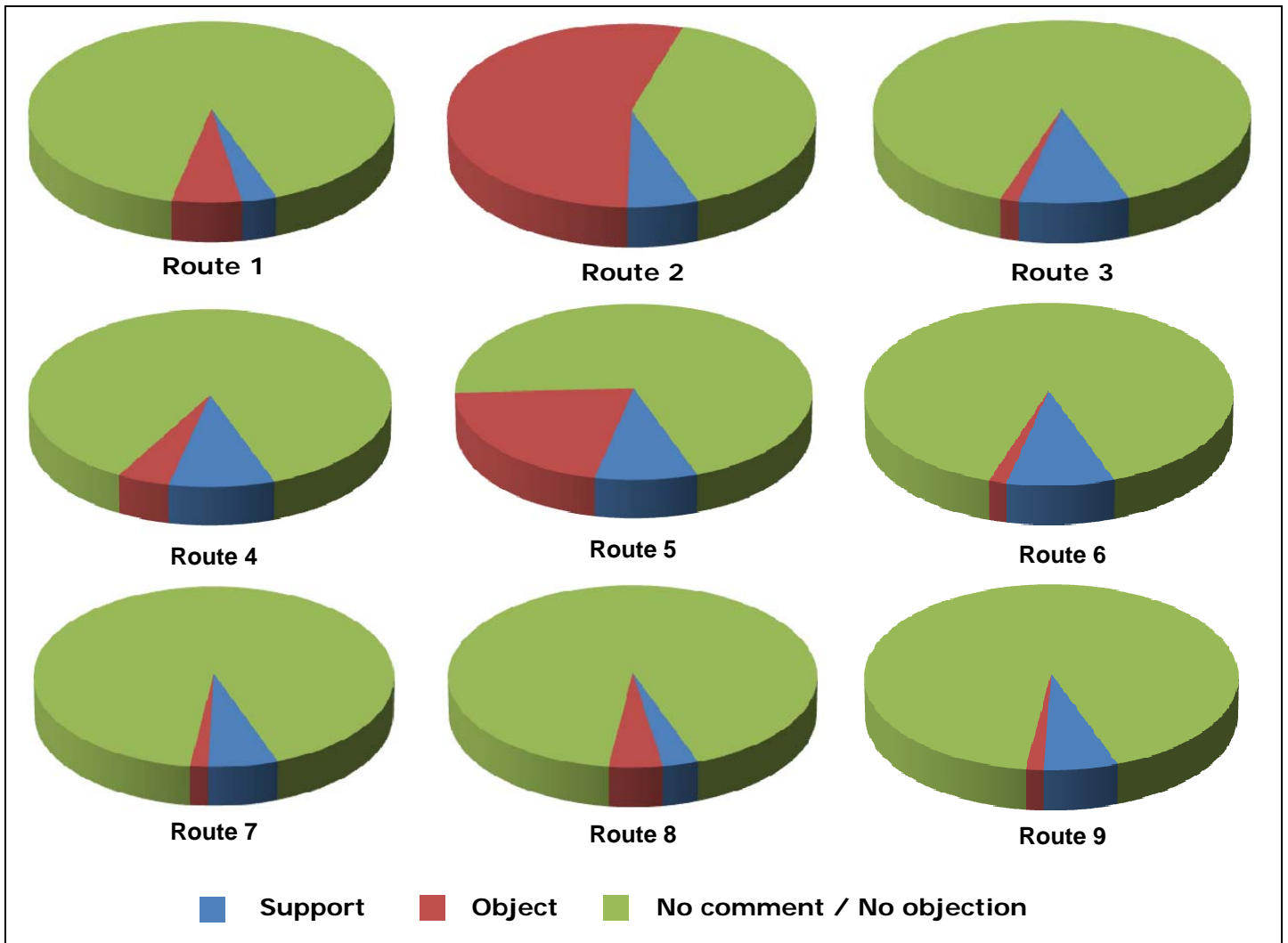


Figure 3. Stakeholder responses to each route

3.1 Key themes arising from objections

Figure 4 and Figure 5 below show the breakdown of the responses from organisations and members of the public respectively. Route 2 and 5 received the majority of the objections, the other routes received only 1 or 2 objections (which includes one stakeholder who objected to all routes).

Route 2

Of the nine routes proposed, route number 2 received the most objections (5 from organisations and 32 from individuals). This route passes just west of East Grinstead. The proposed PRNAV centreline positions aircraft to the left of the NPR centreline whereas previously (utilising conventional navigation) the traffic was more dispersed to the right of the NPR centreline. Using PRNAV the distribution of traffic is more concentrated, and it is contained entirely within the NPR.

It should be noted that route 2 was one of the routes included in the PRNAV trial, and as such a proportion of aircraft have been flying the PRNAV procedure since 2007.

Note: the PRNAV trial is not related to the change in operations of EasyJet as reported in the East Grinstead Courier & Observer 13-Sept-2012 which claimed that they had recently changed their route.

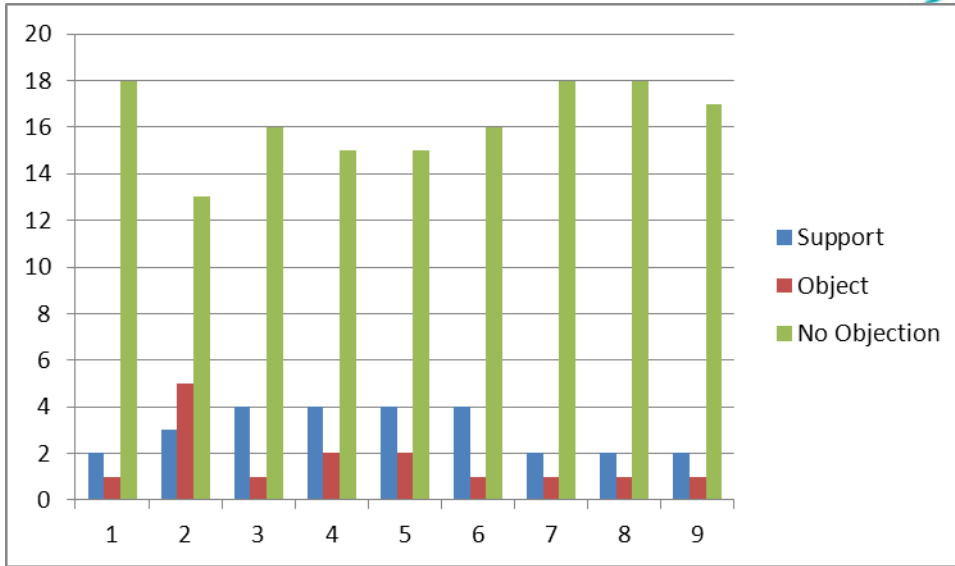


Figure 4 Responses from Organisations to each proposed route

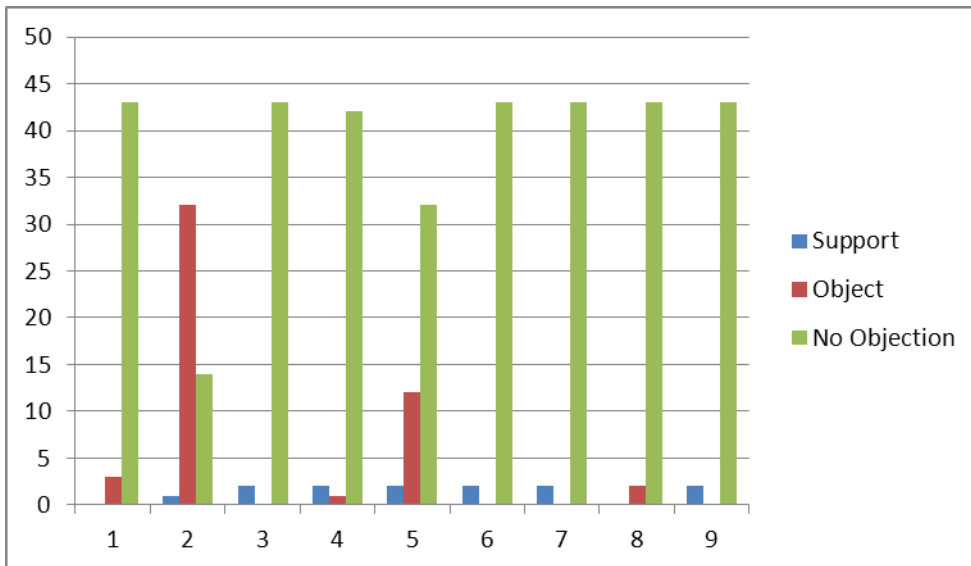


Figure 5 Responses from Members of the Public to each proposed route

4. Comments on particular issues

The objections were categorised according to the key themes identified in Figure 6 below. One response could include several themes & hence would be counted in each category. There were five recurring themes for objections, which were (in order of frequency): noise pollution; traffic concentration issues; air pollution /emissions; impact on property prices and process compliance. 53 responses included an objection to one or more of the routes. The pre-eminent reason given for objections was on the grounds of noise pollution. This was cited in almost all responses where any reason for the objection was given.

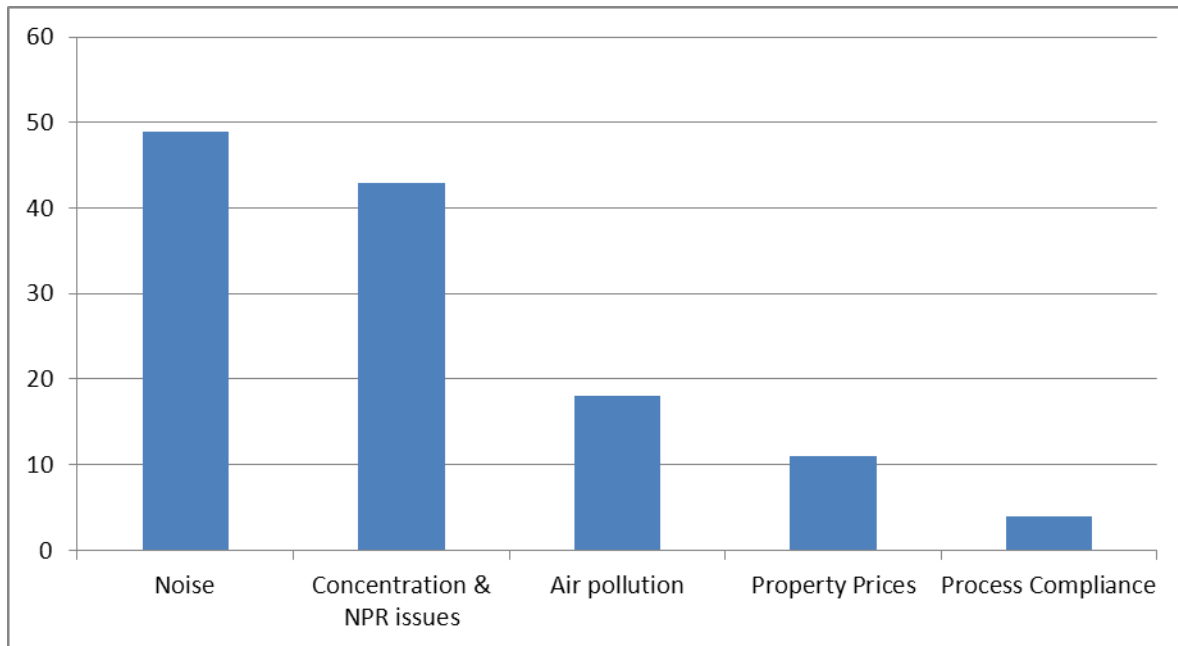


Figure 6. Key themes arising from objections

Within each of the themes, particular and recurring issues could be identified. These are summarised below, with comments.

4.1 Noise Pollution

Noise pollution is recognised as being the most significant impact of overflying aircraft at low levels. Government policy³ for the minimizing the impact of noise pollution from aircraft at low level on the population, is to encourage concentration of flights in a few narrow corridors as opposed to dispersal across wider areas. Gatwick Airport is designated under section 80 of the Civil Aviation Act 1982 for the purposes of section 78 of that Act, giving rise to the descriptor “designated airports”. Section 78 empowers the Secretary of State to regulate noise and vibration connected with aircraft taking off or landing at designated airports. As Gatwick is a designated airport, Noise Preferential Routes (NPRs) have been defined by the Department for Transport, within which aircraft are required to stay until they achieve a given altitude (4000ft for the Gatwick NPRs). The NPRs are defined as 3km wide swathes. The purpose of the NPRs is to define corridors in which people can expect to see over-flying aircraft.

The PRNAV routes proposed are designed to keep flights within the NPR corridors. Due to the greater accuracy of PRNAV navigation, aircraft will be kept within the NPR with improved reliability.

4.2 Changes in traffic concentration

The recurring theme of most of the objections to the proposal for route 2, were centred on the

³ <http://www.caa.co.uk/docs/7/DTLREnvironmentalGuidance.pdf> (page 13)

movement of the flight concentration within the NPR swathe. In particular, that if the proposed PRNAV SID that had been trialled, were permanently adopted, the average centreline would be east of the NPR centreline.

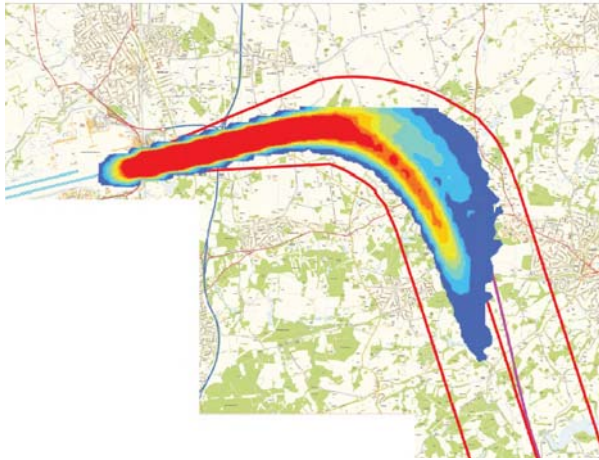


Figure 7: Route 2 dispersal – all flights

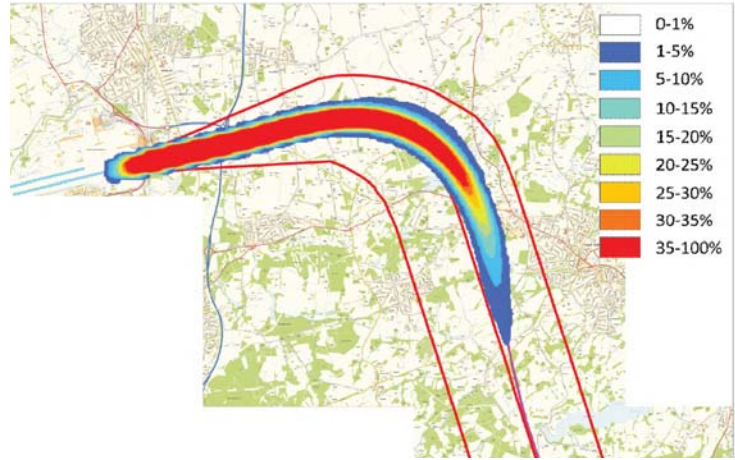


Figure 8 : Route 2 dispersal – PRNAV flights only

Figure 7 shows that using conventional navigation, flights are dispersed more widely across the width of the NPR. Figure 8 shows that flights using PRNAV navigation maintain a much more consistent trajectory, and are concentrated closer to the NPR centreline. While this keeps aircraft close to the centre of the NPR, the change does bring the tracks slightly closer to East Grinstead. Due to the required design constraints for PRNAV procedures⁴ it is not possible to match exactly, the NPR centreline (see Figure 9 below). As a result, the PRNAV SID design centreline is positioned slightly to the east just after the initial turn. The maximum distance of the PRNAV procedure centreline from the NPR centreline is 370m.

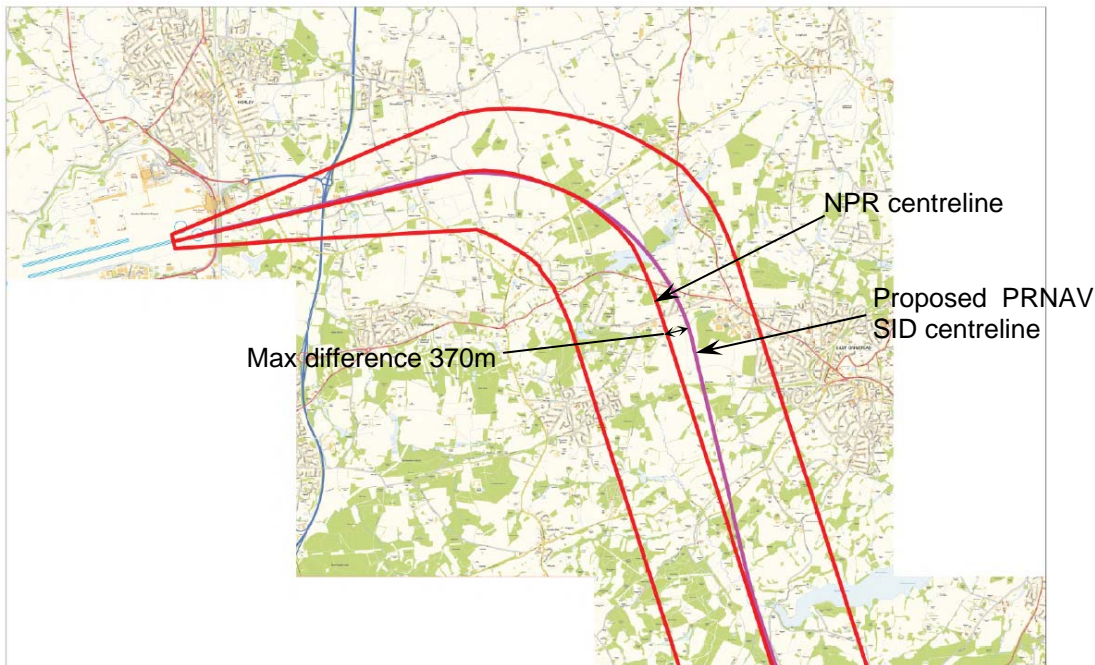


Figure 9 Route 2, NPR & PRNAV SID centrelines

⁴ ICAO PANS-OPS, Doc 8168

4.3 Air pollution (Local Air Quality)

Some members of the public were concerned about possible air pollution resulting from the proposed change in the SIDs. The quality of the air around the UK's major airports is closely monitored. There is one Air Quality Management Area (AQMA) adjacent to Gatwick Airport – the Horley Gardens AQMA designated by Reigate and Banstead Borough Council. An AQMA is a legally defined area in which air quality is strictly monitored by the Local Authority and the airport operator. The impact of aircraft operations at the airport, both on the ground and during the take-off and landing cycles, has a potential to impact on the air quality in the AQMAs. However the majority of the impact is due to operations on the ground and at altitudes below 1000ft. Once airborne, due to mixing and dispersion in the atmosphere, the impact of emissions on local air quality of aircraft above 1000ft is much less.

The ICAO Airport Air Quality Manual states that:

“Differences to emissions above 1000 AGL will have little impact on changes in ground-level concentrations.”

The design criteria for PRNAV procedures require that aircraft climb straight, along the runway extended centreline to more than 1000ft agl before turning. Hence the changes suggested by this proposal would not have an effect on the local air quality at ground level. For this reason detailed Local Air Quality assessment was not required by the CAA.

4.4 Property prices

Some respondents expressed concern that the price of their property would be adversely affected by the proposed change. While it is understood that aircraft noise could (amongst many other factors) influence the value of a particular property, property prices on their own (as distinct from noise impact) are not considered when making airspace changes. Government policy directs the sponsors of airspace changes to strive to minimize the noise impact on populations. However since the two are inter-related, the corollary of minimizing the noise impact on the population is also to minimize the impact on property prices.

4.5 Process compliance, consultation.

Some respondents to the consultation objected on the grounds that they had not been adequately consulted with. However the list of stakeholders identified as primary recipients of the consultation material was agreed with the CAA in accordance with CAA guidance. The consultation material was distributed to an extensive list of stakeholders and the responses received are evidence that the information has been disseminated widely.

Stakeholders who came forward during consultation have been included in the dialogue alongside those who were contacted initially, and their input has been given equal weighting.

5. Summary of intended Airspace Change Proposal

As a result of careful consideration of all Consultation responses, GAL intends to proceed to submit an Airspace Change Proposal (ACP) to the CAA. The basis of this proposal will be for the introduction of new PRNAV SIDS which replicate the existing conventional SIDs as closely as possible (as described in the consultation document). This ACP will be considered by the CAA and they will reach a decision in spring 2013.

To allow for aircraft which are not yet PRNAV equipped, the conventional SIDs will remain available until such time as the aircraft PRNAV equipage rate is close to 100%. This will facilitate a gradual, managed transition to PRNAV. The proposed implementation date for the PRNAV SIDs to be introduced is 04 April 2013. However this is dependent on many factors, including CAA approval of the proposed change.

The consultation period for this airspace change proposal closed on 19th October 2012, if you have any further comments you may wish to make, these will still be accepted, and if they present new evidence, may still influence the final airspace change proposal. All responses submitted will be forwarded to the CAA Directorate of Airspace Policy who will consider the merits of this proposal.