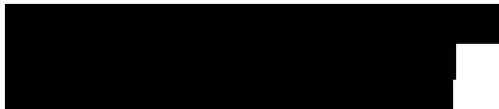


Safety & Airspace Regulation Group
Airspace, Air Traffic Management and Aerodrome Division



By email:



[Redacted]
Regulatory Lead
Gatwick Airport Limited
Destinations Place
Gatwick Airport
West Sussex
RH6 0NP

12 June 2020

Dear [Redacted],

Thank you for your letter dated 02 June 2020 detailing GAL's response to CAP 1912, the CAA's Decision on the PIR of Gatwick Airports Runway 26 Route 4 RNAV-1 SID.

Delay

Although we note that there was a delay publishing CAP 1912 whilst we processed the large volume of responses received in relation to the draft decision, GAL have been aware of the likely outcome for some time, and we do not consider the delay to final publication a justification for further delay.

We accept that the unprecedented impact of COVID-19 could give rise to delay if the deployment of required changes detailed in your letter were appropriate; however, the CAA requires further information to understand your concerns as detailed below.

NATS AIRAC Capacity and Associated Resource

The CAA is unclear on the basis for which you assert that denotification of the RNAV SIDs requires a NAS AIRAC update, rather than an ordinary AIRAC cycle; including AIRAC 11/2020 which avoids the September NAS build. Please explain the justification and safety concerns to evidence that a NAS AIRAC is required to deploy the denotification change.

ANSL & GAL Safety Work

The Conventional Route 4 SIDs at Gatwick are pre-existing and not amended by the denotification of the RNAV SIDs. If there are "industry acknowledged" issues with RNAV overlay coding, why have these not been addressed earlier? Please detail the specific safety issues mentioned in your letter and please articulate why other forms of mitigation cannot be utilised instead of delaying denotification.

Truncation of the CLN and DVR Conventional SIDs

CAP 1912 relates only to the Route 4 RNAV SIDS, if GAL wish to truncate the CLN and DVR SIDs it should do so via the CAP 1616 SID Truncation Policy. Absent a specific safety issue, the CAA does not consider this relevant to the CAP 1912 timeline for denotification.

Retention of the BIG 2X SID for Positioning Flights Only

This is the first time GAL has raised the potential retention of the BIG 2X RNAV SID, despite opportunities to do so before the decision was finalised. The CAA is not minded to reopen its decision, however, please detail the consequences if this were removed, and why have the considered alternatives not been progressed when GAL have been aware that this denotification was pending.

Conclusion

Your letter does not adequately justify departure from the CAP 1912 timeline to implement denotification of the Route 4 RNAV-1 SIDs. Additional detail is required in articulating your safety concerns, so a more detailed understanding can be gained on consequences and workload issues, as well as an explanation as to why these safety arguments are now being presented.

Yours sincerely,



Manager Airspace Regulation

Civil Aviation Authority

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