

Dear Sir,

[Consultation on Proposal to modify NATS' planning and reporting requirements](#)

This letter is a response to the NATS's consultation process on the above.

The most fundamental issue is the over-complicated governance arrangements relating to air traffic planning and management arising, in large part, from the number of organisations involved and their different remits - the Department of Transport, the CAA, NATS and even the airports themselves who initiate the scheduling of aircraft. This leads to a lack of transparency and, in consequence, causes a barrier to public engagement, particularly local communities, prior to important decisions being taken that can seriously affect their quality of life. In practice this often means that basic and fundamental decisions about numbers of flights, scheduling and flight paths are made before any public consultation and also leads to incomplete and deficient controls. An example of the latter is the limited empowerment of NATS to direct aircraft on flight paths and aircraft height: NATS can only advise because it is ultimately the pilots decision as the latter is responsible for aircraft safety. Certainly at Gatwick this is often abused by pilots leading to aircraft approaching far below the minimum height limit.

Community groups and members of the public should be consulted at all stages on all issues relating to airports and the use of airspace and there should be one unitary authority that coordinates this. There needs to be a unitary authority with a strategic overview.

NATS have a potential conflict of interest - taking economic and safety as priority and giving little weight to the detrimental impact on local communities and giving little opportunity for community engagement.

There should be a recommended list of relevant and measurable performance indicators on the NATs performance in responding to environmental issues - relevant to those that have the misfortune to live under or near a flight-path - this involves effective monitoring and the results of the monitoring should be published annually. Measurable performance indicators should include the numbers of people affected by aircraft noise, aircraft movements by time of day (& night) and proportion of aircraft who fly under a minimum prescribed height for different ranges of set miles from the runway by time of day and night and, similarly, the proportions and numbers that stray from the designated flight path. Reports on these performance measure relating to the environmental impact of passenger aircraft should be submitted to a consultative committee and corresponding committees with respect to the different airports. The committees should include representatives from relevant communities.

Yours Sincerely

**Gatwick Area Nighflight Nightmare (GANN).**