

██████████  
Manager Airspace Regulation  
Civil Aviation Authority  
CAA House  
45-59 Kingsway  
London  
WC2B 6TE

3 July 2019

Dear Stuart,

**Airspace Change Proposal – ‘Route 4’ SIDs at Gatwick Airport (ACP-2018-86)**

I refer to your letter dated 14 June 2019 in which you confirmed the instruction that Gatwick Airport Ltd (GAL) undertake a review of the conventional Route 4 Standard Instrument Departures (SIDs) in accordance with the original airspace change process relating to the implementation of RNAV-1 SIDs at Gatwick Airport initiated in November 2012. Your letter states that you will not permit the Airspace Change Proposal (ACP) initiated in 2018 in respect of the Route 4 SIDs (CAA reference: ACP-2018-86) to progress through the Stage 1 Gateway of the airspace change process without appropriate design principles considering the conventional SIDs.

In response to your letter and as outlined in my note of 23 March 2018 we have concerns regarding the initiation of an ACP, focussing on the Route 4 conventional SIDs, at the same time as the current ACP as we expect this would give rise to confusion amongst those stakeholders with whom we would be required to consult. I am also cognisant that, despite our best intentions, we run the risk of ‘consultation fatigue and overload’ on the part of those same stakeholders. This is all the more pertinent given that we would have to consult as part of the ACP for a set of SIDs that would never, in reality, be flown.

In my note I mentioned that in order to reduce the risk of confusion amongst local stakeholders our intention, if a review of the conventional SIDs in accordance with the CAP 1616 Airspace Change Process is unavoidable, that the Route 4 RNAV SIDs ACP (Ref: ACP-2018-86) and the proposed review of the conventional SIDs should be conducted separately.

Having given this matter due consideration, we are concerned that the link established in your letter between the ACP initiated in November 2012 and the current Route 4 ACP (Ref: ACP-2018-86) increases risk to the successful and timely completion of the current ACP. At the very least, if we were to belatedly include a review of the conventional Route 4 SIDs, as instructed, as part of our current Route 4 ACP (ref: ACP-2018-86) then we believe it would be prudent to repeat Stage 1B of the process adding significant delay to an already challenging timescale thus potentially exposing both our organisations to understandable frustration from our local communities who are looking to us for a swift resolution to this matter.

Given the significant risks we believe that the course of action you have instructed us to undertake would introduce into the current Route 4 ACP (Ref: ACP2018-86), I can confirm that on behalf of GAL we have decided not to review the conventional SIDs as requested. We expect

that this decision will allow the CAA to respond to the Judicial Review Pre-action Protocol served on behalf of Plane Justice and to draw to a close the 2012 ACP in relation to the introduction of R-NAV1 SIDs at Gatwick Airport. We anticipate that following a CAA decision we will be required to denotify the current temporary Route 4 RNAV SIDs leaving airlines to fly their own coded overlays. We await your response and decision in this regard.

It remains our expectation that this course of action will de-couple entirely the 2012 implementation of RNAV-1 SIDs at Gatwick Airport from the 2018 Route 4 ACP (Ref: ACP-2018-86) notwithstanding the relevant factors identified under the terms of the consent order which should be taken into account as cited in the ACP-2018-86 Statement of Need. I would be grateful if you would confirm this is the case.

If you wish to meet to discuss the contents of this letter then please contact me directly.

Yours sincerely,



**Head Airspace Strategy and Engagement  
Gatwick Airport Ltd**