

### CAA Analysis of feedback from stakeholders and members of the public

1. The CAA published a draft report of its Post Implementation Review (PIR) of Gatwick Airport Limited's Route 4 RNAV-1 SID Airspace Change Proposal (ACP) (available at [www.caa.co.uk/CAP 1872](http://www.caa.co.uk/CAP_1872)) and invited stakeholders to comment on the draft report's findings during a 28-day feedback window.
2. This exercise was not a requirement under the CAP 725 airspace change process that this ACP is being decided under. However, with the complex history of this ACP the CAA felt it was necessary to allow stakeholders the opportunity to raise matters they feel the CAA had missed, misunderstood or misinterpreted. This is more in line with the current Airspace change Process, CAP 1616.
3. The feedback survey closed on Monday 3 February 2020. A total of 627 responses were received. 59 responses were discounted due to duplicate responses from a single individual.
4. We have reviewed and considered the feedback received, detailed our findings and provided the CAA's response where appropriate. Our comments to the relevant feedback are in blue.

#### Summary of Survey questions and responses

5. The online survey invited respondents to answer 6 questions. Questions 1 to 5 asked for personal or organisational details of the respondent and question 6 provided a 'free-text' window for the respondents to state what, in their view, the CAA had missed, misunderstood or misinterpreted in the report and allowed the respondents to upload any supporting documentary evidence. The data from question 6 was analysed and the results are presented below.

#### Question 1 asked: "Are you responding in an official capacity on behalf of an organisation?"

6. 568 responders answered this question, with 547 completing the survey as an individual and 21 completing the survey on behalf of an organisation. 23% of respondents were content with the draft report of PIR of Gatwick Airport Limited's Route 4 RNAV-1 SID ACP.
7. The organisations that responded included:
  - UK Flight Safety Committee
  - Salfords and Sidlow Parish Council
  - Quiet Outwood Volunteers
  - Outwood Parish Council
  - Park Lane, Residents' Association
  - Grenehurst Park Residents Company Ltd
  - Nutfield Conservation Society
  - Holmwood Park Residents' Association

- Deepdene Wood Residents Association
  - Plane Justice (letter from Richard Buxton Solicitors outlines their response)
  - Norwood Hill Residents Association
  - Route 4 No More
  - Broome Hall Residents Association
  - Communities against Gatwick noise and emissions (CAGNE)
  - Campaign to Protect Rural England (CPRE) Mole Valley Committee of the Surrey Branch
  - Betchworth Parish Council
  - NATS (Swanwick)
  - Air Navigation Solutions Ltd
  - Plane Wrong
  - Gatwick Airport Limited
  - Surrey County Councillor for Reigate
8. Additional responses from Harrison Grant on behalf of Plane Wrong were received following the closure of the survey and were also considered by the CAA.
9. 12 respondents uploaded documents in support of their feedback.

### Themes from feedback

10. Inadequate Consultation. The main theme that emerged from stakeholders' feedback was about the approach that was taken to invite stakeholders to comment on the draft report's findings during a 28-day feedback window. The stakeholders misconceived an opportunity to provide feedback with a consultation on a decision to move Route 4. Consequently, many respondents stated that feedback window was not long enough, the ACP consultation was inadequate and was not widely advertised / communicated and requested to conduct a full consultation.

[CAA Comment: This was an opportunity to comment on the Draft Report and accords with the process outlined in CAP 1616 when the CAA publishes a Draft Decision and requests feedback.](#)

11. Noise & environmental impact. The other main theme that emerged from stakeholders' feedback was an increase in the noise impact from aircraft flying outside the NPR as well as air quality and other environmental impacts not being addressed. One stakeholder (NATS) stated that the removal of the Route 4 RNAV SIDs will bring an environmental disbenefits due to length of the conventional SID track compared to that of RNAV.

[CAA Comment: The CAA has considered the responses received in this regard and amended paragraph 37 in its decision \(CAP 1872\).](#)

12. Areas affected. Stakeholders stated that the revised path will fly over more densely populated areas than before, and as a result of moving the route north of the NPR referred to the following areas as now being affected by a significant increase in noise: Newdigate, Beare Green, Capel, Coldharbour, South Holmwood, Holmwoods, North Holmwood, Leigh, Brockham, Betchworth, Reigate, Reigate Heath, Redhill, Dorking, East Surrey Hospital, Leith Hill and Tower, Buckland, Salfords, the National Trust site at Holmwood Common, Betchworth, Brockham, North Downs Park, Earlswood Common, South Park and

Woodhatch (Reigate). Some respondents' views were that little regard was given to obtain accurate numbers of properties, and future developments, being overflown.

13. AONB Stakeholders said that the Draft Decision demonstrated a misunderstanding of the impact the changes would have on the peace and tranquillity enjoyed by residents of and visitors to the Surrey Hills Area of Outstanding Natural Beauty.
14. Interaction with Route 3. Respondents were concerned that the revised Route 4 will increase overlap with Route 3 and the areas that are already overflown by Route 3 will be affected by routes in both directions. Stakeholders stated that to judge the impact of a departure route in isolation is misrepresentative, and no assessment had been made of the cumulative noise impact. Also, no account was being taken of Heathrow departures or the Ockham stack.

CAA Comment: Based on historical track data, it is correct to state the removal of the 2016 RNAV 1 SID and reversion to the original conventional SID may move the majority of Route 4 departures approximately 800m north taking them closer to Route 3. However, ACP-2018-86 is proposing to redesign Route 4 RNAV SIDs seeking to limit and where possible reduce the environmental impacts on local communities in the vicinity of Route 4. It is also noted that Route 3 and Route 4 cannot operate simultaneously.

It is noted that the decision considers only whether the ACP has met, to an acceptable standard, its original stated aim.

15. Keeping Route 4 as it is. There were multiple requests to leave Route 4 SID as it currently is, closer to the airport, and not move it to the northern edge of the NPR swathe due to the noise impact from overflight. Some respondents also commented that there was not enough explanation provided as to why the decision has been reversed.
16. Content with the Draft Report / in support. Some stakeholders believed that the Draft Report was complete, and no matters had been missed, misunderstood or misinterpreted. They supported speedy implementation.
17. Technical nature of report/errors contained in the Civil Aviation Authority's (CAA) Draft Decision Report. Feedback was received that the Draft Report was too technical to understand and provide meaningful responses to.
18. Impact of increased noise on physical and mental health and on quality of life. Respondents referred to the impact on their well-being (including inability to enjoy their gardens) together with the health, well-being and learning outcomes of children in schools. Some stakeholders referred to deterioration of their quality of life.

19. Properties value affected by change/noise. Stakeholders were concerned that moving Route 4 over the areas that were previously not impacted would have an impact on the value of properties, due to aircraft noise.

20. NPR alignment should be agreed with the Department for Transport Respondents referred to Paragraph 29 of the Draft Decision that NPR alignment is a matter for Gatwick Airport to agree with the Department for Transport.

CAA Comment: NPRs at designated airports (of which Gatwick is one) are decided by the Secretary of State (SoS) under Section 78 of the Civil Aviation Act 1982; therefore, any change to the location of an existing or new NPR at Gatwick Airport will need to be approved by the SoS. However, the Government is keen to ensure that, as with noise controls, NPRs are determined at the local level. Whilst ownership of the NPRs has not been transferred to designated airports, any proposals for changes to the existing NPRs, or proposals for new NPRs, will be expected to come from the airport. Providing that the airport can demonstrate that it has fully consulted communities and other stakeholders on its proposed amendments to the NPR arrangements, the Government is likely to give serious consideration to the proposal.

One response highlighted a potential error in the description of the NPR in the AIP and the CAA has raised this with the Department for Transport.

21. 2019 Conventional SID – Respondents stated that the conventional SID being used to judge the RNAV-1 SID was not a valid comparison as it was based on combined historical errors, had not been the subject of a public consultation or environmental assessment and that the CAA had failed to take proper account of the NPR when establishing the position of the 2019 (old 2012) conventional SID. It should not be used as a benchmark to compare RNAV SID against. The only effective comparison is with the clearly defined NPR.

CAA Comment: The 2019 conventional SID is in the same location as the conventional SID from 1999 – 2017.. The CAA notes that the original stated aim of the ACP under consideration was whether the RNAV SID is a satisfactory replication of the conventional SIDs, not the NPR.

As stated in the 2014 Air Navigation Guidance<sup>1</sup>, where an NPR centreline no longer reflects the published SID route, consideration must be given to realigning the NPR so that it appropriately reflects the SID being implemented or amended. This is a matter for the Department for Transport.

The CAA reiterates that this decision does not affect the location of the Conventional SID.

22. CAP 1346 (Report of the CAA's Post-Implementation Review of the Implementation of RNAV – 1 Standard Instrument Departures at Gatwick Airport) published in 2015. Respondents said that the Draft Decision did not take account of the modification to the design which would bring the track further away from communities such as Leigh, Reigate

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<sup>1</sup> Guidance to the Civil Aviation Authority on Environmental Objectives Relating to the Exercise of its Air Navigation Functions

and Redhill that would be more in line with where traffic would be expected to be (Chapter 10, para 9.50).

23. Delay

It was proposed that the CAA should postpone its decision until the conclusion of ACP-2018-86; as a potential outcome of that decision may result in another change to the flow of air traffic on Route 4 in the future.

CAA Comment: The CAA has considered this position and will not postpone the decision. ACP-2018-86 is in its early stages of development and the CAA cannot predict its outcome nor potential conclusion date, particularly given the current state of the aviation industry as a result of COVID-19, which is likely to introduce delay.

This ACP was commenced in 2012 and must be brought to a conclusion without further indeterminable delay.