

Cllr Allen Kay
Deputy Leader

By email

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Our ref: EP/Policy/Aviation
Date: 31 December 2014

Dear Mr Swan,

Re: CAA Post implementation review of P-RNAV, Gatwick Departure Routes

I am writing with regard to the introduction of P-RNAV at Gatwick Airport. My comments relate to the impact of recent changes on Reigate and Banstead borough, which lies immediately to the north of the airport, and includes the towns of Horley, Redhill and Reigate. Specifically, I am concerned at the effect that the use of P-RNAV precision route navigation is having on residents in the borough on both of the northern wrap-around routes.

The introduction of P-RNAV has had the effect of concentrating flight paths (and therefore noise for many individuals) within a narrower corridor and on a different centreline than has historically been the case. Those residents who live underneath the main flight paths now suffer from more regular overflights. As a Council, we have received a dramatic increase in the number of complaints about aircraft noise since May this year, in particular from the south Redhill and Reigate areas. These are areas that have always been overflown, but which are now experiencing significantly more noise disturbance than before.

I recognise the longer term European requirements to introduce performance based navigation systems and – in general terms – the benefits of implementing new technologies. However I strongly believe that more thought needs to be given to the impact of the flight path concentration on distinct areas, and that the Post Implementation Review stage provides an opportunity to do this.

When Gatwick Airport consulted on the early implementation of P-RNAV, an integral part of this was a post implementation management oversight process, such that should any change be deemed to be of detrimental effect, it could be withdrawn. This approach was supported by the Gatwick Airport Consultative Committee.

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There is now clear evidence that the changes have a detrimental impact on some local communities. Not only has this Council received an increased level of complaints, but Gatwick Airport's own figures also show a notable increase in the levels of complaint since P-RNAV was introduced. The Casper tracking system demonstrates that Gatwick departing aircraft are taking a more northerly route with those overflying Redhill often at heights as low as 4,000ft. The noise levels of those aircraft overhead, and in particular their increased frequency as a result of concentration is clearly overwhelming for many residents.

Reigate & Banstead Borough Council therefore urge that **the recent changes be withdrawn** to allow for detailed review of the relative noise impacts of concentrated versus dispersed air traffic.

We also request that, as part of this review, and in your capacity as Directorate of Airspace Policy, you give serious consideration to **reversion to the original dispersed system** with wider, more southerly noise preferential routes (NPRs) on both 026 and 08 runways out of Gatwick Airport. In support of this request, we note that the recent DfT Guidance¹ clearly states that "While the CAA should follow a policy of concentration in most cases, the Government recognises that there may be local circumstances where the advantage lies in dispersing traffic, such as for the purposes of providing noise respite over areas which may be considered to be particularly noise sensitive. It is important that any decisions about whether to concentrate or disperse traffic take account of the local context alongside the operation and generic environmental objectives presented in this Guidance. This local context may become apparent through appropriate consultation with the local community."

Reigate & Banstead Borough Council is committed to continuing to participate in discussions on this issue, including through the Gatwick Airport Consultative Committee. However, I hope you will also be able to take our comments, and the amenity of our local communities, into account as part of your Post Implementation Review. I would be happy to discuss the experiences of Reigate & Banstead residents with you – if this would be helpful, please do not hesitate to get in touch.

Yours sincerely,

Allen Kay

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¹Guidance to the Civil Aviation Authority on Environmental Objectives Relating to the Exercise of its Air Navigation Functions, January 2014, section 7.8