

## THE GATWICK AIR SPACE CONSULTATION 2014

### RESPONSE BY CAPEL PARISH COUNCIL

#### 1. Introduction

- 1.1 This most recent consultation relating to 'Airspace' changes (since 2012, "The Future Airspace Strategy" (FAS)) sets out a strategic framework that would enable NATS to create an airspace structure.
- 1.2 The then strategy (in 2012) considered the 'routing' of "***user preferred trajectories***" optimising the air space design in "Technical Manoeuvring Areas" (TMA's) to accommodate maximum use of improved ventricle performance linked to fuel efficiency and environmental benefits.
- 1.3 The representation now submitted by Capel Parish Council (CPC) details in the clearest possible terms, that the strategies referred to in 1.2 above only had taken into account NATS, Gatwick Airport Ltd. and the airline users. It is clear from the outset that no consideration has been given to the CPC community regarding the adverse environmental impact the proposal will have on the Parish and its residents.
- 1.4 The underlying issue is the impact and application of P-RNAV. P-RNAV is aimed to providing improvements in navigational technology to enable aircraft to fly with increased accuracy within the existing routes. It has been argued that the new wave of aircraft do not have the flexibility to fly the routes after take off from Gatwick other than the present proposals (unless a manual application is applied). We do not accept modern technology can impose such a restriction.

- 1.5 CPC will indicate that the application of P-RNAV, if applied to have regard to the parish environment, should have established a routing which avoids the village communities of Capel, Beare Green and Coldharbour. It will also refer to the impact the routing proposals have on the Leith Hill / Surrey Hills AONB.
- 1.6 The Gatwick Local Area Consultation, and the 'multiple' choice questions follow the format adopted by GAL regarding proposals for a second runway. The options are multi faceted and ambiguous. CPC has no doubt its intentions are aimed to mislead and result in findings favourable to NATS and GAL.
- 1.7 In response to the second Gatwick Airport runway consultation the 3 options generated approximately 8,400 replies, the majority (more than 75%) rejecting the options being promoted. Even in proportionate terms, therefore, little support was given to any expansion. In population/ratio terms the findings in support of the Gatwick strategy can only be discounted.
- 1.8 The relevance of making reference to the airspace consultation is twofold. Firstly, the methodology adopted, which we consider should be disregarded and secondly, the failure of the consultation to consider the implications of a second runway, an impact which could result in conditions of such adverse magnitude that the 'living' conditions of the community would be unacceptable.
- 1.9 Representations have been submitted by GACC in relation to the Air Space Consultation. CPC adopts those representations which relate to a wider area of impact than the specific concerns of the Parish.

## 2. **The 'Capel Parish' Objection**

2.1 The objections of CPC can be summarised as follows:-

- (i) Object to the report in its entirety as it fails to provide options other than those supporting the strategies of NATS;
- (ii) Paragraph 3.23 makes reference to the Airports Commission Report but no provision is made in the document for the implication of the outcome following the consultation;
- (iii) The precision of P-RNAV should allow flights to be taken away from the villages with a high degree of accuracy – this has not been considered as an appropriate means of minimising impact; Nor has consideration been given to the application of a 'Respite' strategy;
- (iv) While the application and impact of P-RNAV (now on trial) has demonstrated that routing can be precise we have also found that 20% of the flights (the flight-path) go outside the 'zone' (Reference DoTT);
- (v) Absent flexibility if the routes on trial are maintained it will have a serious detrimental impact upon the environment and amenity of residents and visitors to the Areas of Outstanding Natural Beauty. Indeed, flights already breach altitude criteria (4-7000 feet).

- (vi) In relation to Question 1A, none of the options allow for the routes being away from the villages. In addition, in relation to night time flights, the policy in relation to Heathrow should be adopted with NO flights between 23.00 and 06.00 hours;
- (vii) No reference is made to noise and its impact on schools. The schools in Capel and Beare Green are referred to in this submission.

2.2 Capel Parish Council referred to the National Air Transport (NATS) Consultation (2013), the Environmental Noise Directive (Action Plan), the proposed 'Changes to Gatwick Routes' and the proposals for P-RNAV in responding to the runway consultation and the precision proposed in relation to more precise routing (less flexibility).

2.3 In relation to Noise Contours, CPC refer to the Option Plans which neither has regard to P-RNAV nor, the extant noise contours and the flight options "Wizard" and "Lambourne." The "Wizard" implications are important to Capel as flights taking off to the west routing south, south/east will minimise noise impact upon the Parish and other parishes to the east (north of Gatwick).

2.4 It is also important that Capel Parish is seen in the proximity context of Gatwick Airport.

2.5 Capel Parish comprises an area of 2,280 hectares, with a population of approximately 3,500, most of whom live in the villages of Capel, Coldharbour and Beare Green.

2.6 The Parish is located 6 kilometres to the west of the airport boundary (runway). Capel Village being 7.5 kilometres, Beare Green 8 kilometres respectively, from the western extent of the airport runway and the AONB less than 0.5 kilometres further to the north west.

2.7 As the villages are in an elevated position close to the Surrey Hills AONB (275mAOD) they are subject to adverse impact from aircraft westerly departures. Given the aircraft trajectory therefore when taking off from Gatwick (60mAOD) with the elevation of the land, which includes the highest point in Surrey – Leith Hill (292mAOD), it is significant in its noise and visual impact that the average height of aircraft is between 1800 feet (525m) and 2000 feet. For aircraft landing when passing over the Clock House Beacon (to the south of Capel Village) the maximum height is 2000 feet.

Noise monitor readings close to the villages and the AONB (copies attached) shows the magnitude of the noise guidelines being breached. The readings were taken between 22<sup>nd</sup> July and the 1<sup>st</sup> August, 2014.

2.8 The P-RNAV proposals insofar as they relate to the Parish will condemn its residents to live beyond the desirable limits of noise with little respite as they go about their daily activities. They would be environmentally disadvantaged.

2.9 Dwellings can, of course, in principle be insulated. However, to achieve a satisfactory noise environment depends upon windows and doors remaining shut. That plainly requires an unreasonable compromise as people should be able to open their windows and doors without enduring high levels of aircraft noise. Residents are, therefore, entitled to enjoy their gardens without being subjected to a very high level of aircraft noise and, of course, sound insulation offers no protection outside.

2.10 Building Bulletin 93 'Acoustic Design for Schools' has regard to acceptable noise levels (external and internal) and states ***“For new schools, 60dBLaeq should be regarded as an upper limit for use of external used (areas) for formal and informal outdoor teaching and recreations areas.”***

As conditions for existing schools will be worse (absent mitigating noise measures) the proposals now being promoted will impact on the schools in Capel and Beare Green to such an extent that conditions will be untenable at times when the aircraft route west out of Gatwick and follow the “Lambourne” direction.

2.11 In relation to areas of amenity (including the AONB), recreation areas generally, playing fields, open spaces and areas for formal and informal activity, the proposals are unacceptable. Although the emphasis of concern must have regard in the first instance to its existing population (and future residents) or visitors to the Surrey Hills have an expectancy of tranquillity.

2.12 Contrary to the principles of 'good planning' to allow P-RNAV west of Gatwick Airport to impact upon the population would inflict unacceptable, inescapable and permanent harm on residents.

2.13 The overriding interest must be to protect the countryside, the Green Belt, existing and new homes.

2.14 The proximity therefore must be to protect the community.

2.15 No reference is made in the Consultation to National Planning Policy (the NPPF). In our view this is a grave omission and an error of judgement. Paragraph 123 of the NPPF states (albeit in relation to planning decisions) that:-

- (i) noise should be avoided which gives rise to significant adverse impacts on health and the quality of life;
- (ii) areas of tranquillity should be protected (the AONB);
- (iii) air quality should be managed.

#### **Air Noise Contours and P-RNAV**

- 2.16 Departures are particularly noisy close to the airport (Capel is 6km from the airport). Because of this they should follow Noise Preferential Routes (NPRs) until they reach 4000 feet. The NPRs were established long ago, when aircraft were fewer but noisier than now and followed wide corridors 3km (nearly 2 miles) across. Flights were widely distributed within those corridors and provided respite to the residents who live under flight-paths.
- 2.17 While more concentrated flight-paths will (or should) facilitate more accurate aircraft navigation, the tracks will have a severe impact upon Capel Parish. This is already being experienced due to an increased concentration of flights over the villages (+ 20%) (The consequence of runway expansion will exacerbate what are already unacceptable conditions).
- 2.18 As indicated the NATS 'Airspace Consultation' does not have regard to the GAL Runway Consultation. Accordingly, the net effect will be more noise from more aircraft.
- 2.19 The London Airport Gatwick "Environmental Noise Directive 2010-2015" outlined a strategic approach to "Aircraft Noise Management." It refers to a 'Noise Insulation Scheme' and to AONB's.

2.20 With aircraft flying directly over the village, an insulation scheme will not have any benefit to NES nor will it have any benefit to Capel Parish. As regards to the AONB (Surrey Hills/Leith Hill) the very acceptance of noise impact upon the expected tranquillity of the area is compounded by the failure to identify its topographical character.

**The impact of Noise on the Community**

2.21 The World Health Organisation (WHO) "Guidelines for Community Noise" apply to Capel Parish. The Guidelines state that "**noise levels exceeding 50dBA will cause nuisance**". The noise levels proposed by GAL will, therefore, result in unacceptable conditions for the Parish.

2.22 The levels will:-

- interfere with auditory communication;
- will result in sleep disturbance effects;
- will impact upon social behaviour;
- will have a critical impact on sleep;
- will impact on quiet outdoor areas, parklands and conservation areas (AONB's – PC reference);
- will impact on outdoor living areas.

2.23 The P-RNAV proposals will be a breach of WHO 'Guidelines.'



### **Alternative Routing**

2.24 It is advocated that the application of P-RNAV facilitates an accurate routing of aircraft. This has been seen by Capel as an accurate statement but to the detriment of the villages as we are experiencing intolerable conditions. The solution to the impact is, therefore, achievable by ensuring within a designated flight corridor that:-

- (i) the corridor is either east of Capel Village;
- (ii) south of Capel Village;
- (iii) the increased application of 'Wizard.'
- (iv) the provision of the 'respite criteria;
- (v) adherence to minimum height requirements (over the villages and the AONB) following 'Wizard.'

2.25 The application of the above options would minimise the impact of flight departures from Gatwick. Commercial (impact) consideration of the Gatwick users (the airlines) would be minimal. The management of the routes by NATS and the airlines are achievable.

### **Night Flights**

2.26 We believe that the high number of movements permitted at Gatwick at night has serious consequences for the health of people whose sleep is disturbed by them. At present we are recording flights through the night. It seems probable that those whose sleep has been disturbed once will be more easily disturbed by subsequent flights, particularly if they are frequent.

It only takes one noisy aircraft to disturb sleep and, if several follow (as is now the case), it may be impossible to get back to sleep, especially in the early mornings and in the wider area around Gatwick where there is little background noise.

The 'Heathrow' restricted policy in relation to night flights should prevail at Gatwick, i.e. no departures between 23.00 and 0600 hours.

### **Conclusion**

- 3.1 The overriding consideration must be without compromise to the community. Anything less would be unacceptable.
- 3.2 The graph of the noise measurements taken over a longer period (90 minutes) on Sunday morning to get the Leq is nearer to the one that Gatwick would do over a 16 hour day. It shows the impact of the plane noise with peaks up to 70dBA+ against the background of around 45dBA.
- 3.3 Before the routes are formalised following the Airspace Consultation the community, which suffers the worst impact (Capel Parish) must be further consulted and be satisfied all reasonable measures have been taken to minimise the unacceptable conditions which now prevail, and must be avoided in the future.
- 3.4 No explanation has been given as to why the most modern aircraft cannot follow the original NPF or, indeed, alternative routes which avoid population impact. In our view the answer is simple, commercial considerations are seen to be of greater importance than those of residents.

3.5

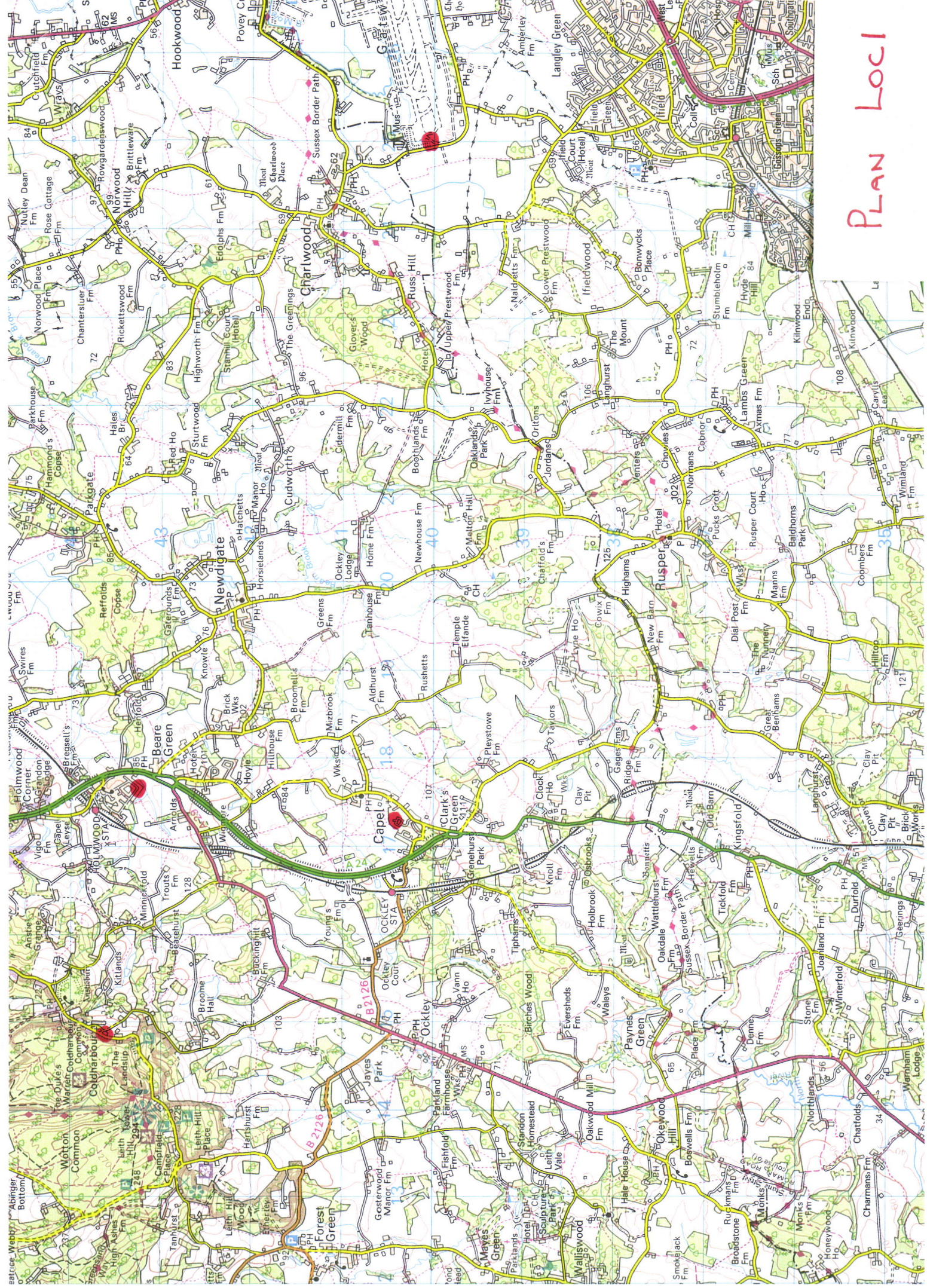
If P-RNAV is to be implemented then the routing west of Gatwick must avoid the villages. Commercial considerations can only be secondary. The environment of residents is the only acceptable consideration.

Capel Parish Council

August 2014

cc Sir Paul Beresford, M.P.

CEO/MVDC



PLAN LOCAL

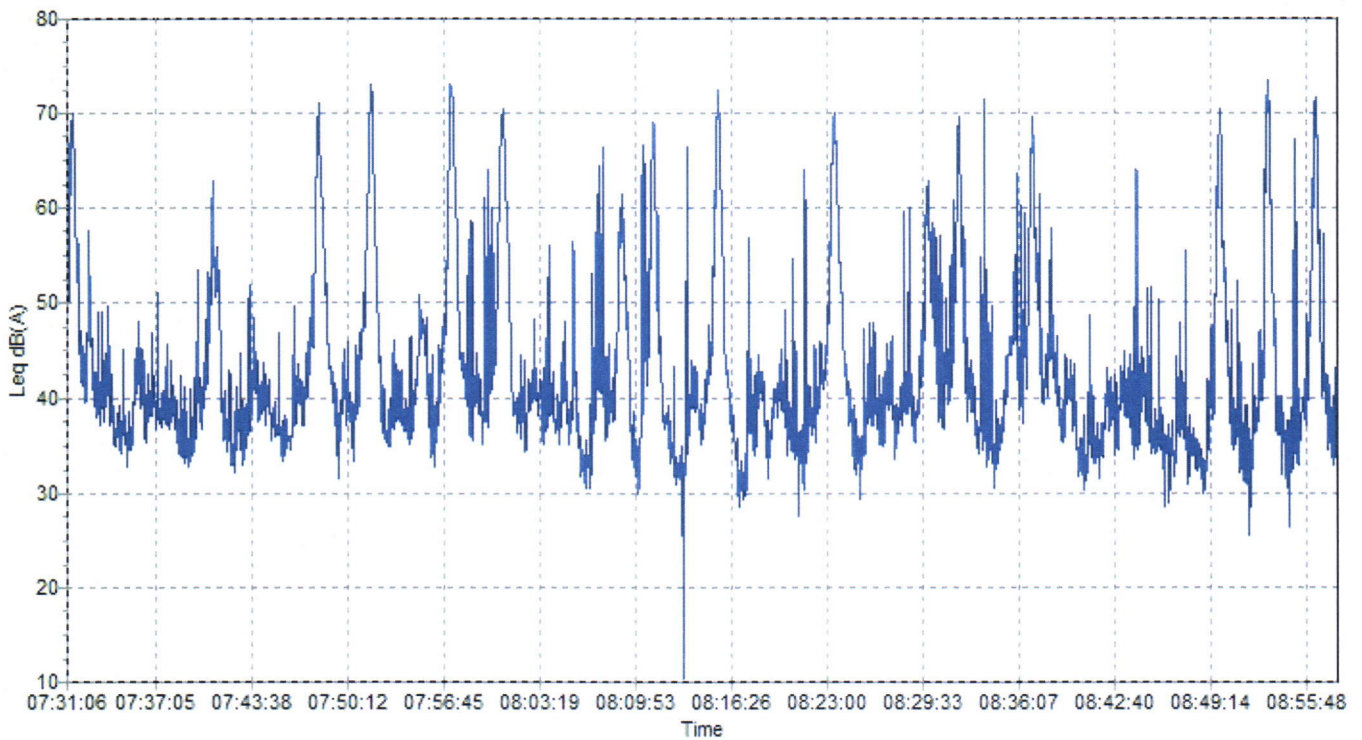
# Measurement Report

## Measurement Details

Date and Time: 03/08/2014 07:31  
Sound Level Meter: Cirrus Research plc  
Recalibration Due: 30/11/2013  
Run Duration: 01:26:52 hh:mm:ss  
Range: 30-100 dB  
Overload: no

## Data

Leq	56.7 dBA	L1.0	70.3 dBA
Lepd	49.3 dBA	L10.0	55.8 dBA
LAE	93.6 dBA	L50.0	39.0 dBA
LAFmax	74.8 dBA	L90.0	32.9 dBA
Peak	95.1 dBC	L95.0	31.5 dBA
		Lmin	27.0 dBA



Date	Time	Run Time	Leq	Lmax
22/07/2014	14:37	00:00:44	58.40	73.90
03/08/2014	07:31	01:26:52	56.70	74.80
29/07/2014	15:28	00:01:13	56.80	68.50
05/08/2014	19:12	00:00:39	73.20	84.20
05/08/2014	16:36	00:00:40	67.80	77.80
03/08/2014	20:45	00:00:53	68.10	79.50
03/08/2014	18:49	00:01:27	59.70	71.50
03/08/2014	09:05	01:50:40	55.60	85.70
03/08/2014	07:22	00:01:20	54.70	75.70
01/08/2014	09:07	00:00:08	64.30	71.00
01/08/2014	09:05	00:00:18	62.40	77.60
01/08/2014	08:59	00:00:45	56.90	68.40
30/07/2014	16:40	00:00:31	45.20	63.00
29/07/2014	15:32	00:00:48	63.10	72.80
29/07/2014	15:25	00:00:36	60.60	70.70
29/07/2014	15:23	00:00:34	61.90	70.60
29/07/2014	15:18	00:00:31	61.50	70.60
29/07/2014	15:14	00:00:28	64.70	75.20
29/07/2014	15:11	00:01:05	65.80	79.50
29/07/2014	15:10	00:00:31	62.50	70.00
29/07/2014	15:07	00:00:34	61.90	70.50
29/07/2014	15:04	00:00:25	60.30	66.80
29/07/2014	14:46	00:00:43	63.50	73.40
29/07/2014	14:40	00:00:39	66.80	80.40
29/07/2014	14:31	00:00:32	62.60	71.90
29/07/2014	14:29	00:00:12	53.80	63.80
27/07/2014	20:44	00:00:30	70.60	81.80
27/07/2014	20:37	00:00:27	67.70	72.00
27/07/2014	20:31	00:00:26	68.00	89.70
27/07/2014	20:27	00:00:14	67.00	80.90
27/07/2014	20:25	00:00:33	62.50	69.30
27/07/2014	20:22	00:00:20	60.80	63.50
27/07/2014	20:18	00:00:21	58.40	62.20
27/07/2014	20:11	00:00:21	58.00	61.70
27/07/2014	20:09	00:00:23	63.00	67.30
27/07/2014	20:07	00:00:30	66.40	86.80
27/07/2014	19:58	00:00:30	60.90	69.30
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27/07/2014	19:41	00:00:23	66.00	70.90
27/07/2014	19:34	00:00:23	65.40	70.40
27/07/2014	19:17	00:00:16	65.20	70.70
27/07/2014	19:14	00:00:15	68.30	75.60
27/07/2014	19:04	00:00:41	65.10	72.20
27/07/2014	19:01	00:00:24	64.30	72.30
27/07/2014	18:55	00:00:36	63.50	70.50
27/07/2014	18:53	00:00:29	61.30	68.70

27/07/2014 16:33	00:03:08	52.60	75.00
27/07/2014 16:31	00:00:38	64.30	73.00
27/07/2014 15:30	00:00:25	60.30	65.90
27/07/2014 14:47	00:00:42	70.00	78.20
27/07/2014 14:30	00:00:32	59.80	67.90
27/07/2014 14:28	00:00:38	60.90	69.00
27/07/2014 14:14	00:00:53	57.00	66.80
27/07/2014 09:50	00:00:36	64.70	72.00
27/07/2014 09:43	00:00:55	39.20	59.30
27/07/2014 09:42	00:00:29	64.90	71.70
27/07/2014 09:30	00:01:07	62.40	72.20
27/07/2014 08:11	00:00:34	64.30	73.90
27/07/2014 07:47	00:00:25	60.00	76.70
26/07/2014 22:31	00:02:52	68.30	92.60
26/07/2014 21:43	00:00:22	62.50	73.40
26/07/2014 20:46	00:00:36	66.10	80.80
26/07/2014 20:28	00:00:38	63.90	71.30
26/07/2014 20:09	00:00:42	66.00	71.00
26/07/2014 20:07	00:00:33	61.90	66.70
26/07/2014 19:57	00:02:20	67.80	90.50
26/07/2014 19:55	00:00:25	54.90	60.40
26/07/2014 19:40	00:00:48	61.50	70.50
22/07/2014 15:57	00:00:05	59.30	67.30
22/07/2014 15:56	00:00:19	65.90	76.90
22/07/2014 14:39	00:00:10	52.10	63.40

Total Run 1	Total Leq d	Highest LMax
04:03:09	59.5173	92.60