

Civil Aviation Authority
Aviation House
Beehive Ringroad
Crawley
West Sussex
RH6 0YR

By: E mail

18th September, 2019

Dear Sirs

Gatwick Airport – Proposed Reduced Night Noise Trial

As Chairman of People Against Gatwick Noise and Emissions (PAGNE), a Community Noise Group member of Gatwick’s Noise Management Board, I am writing to you to make you aware of our deep and on-going concerns in relation to Gatwick Airport’s proposed Reduced Night Noise Trial. We have previously raised these concerns directly with the airport, but in our view, the response received has failed to effectively address our concerns, is rather dismissive in tone and as a result is wholly inadequate.

I can confirm that, our last communication with the airport, dated 27th August, 2019, received neither a reply nor an acknowledgement. Consequently, we have been left with no alternative, but to escalate our issues and concerns to yourselves. We acknowledge that, per the CAP1616 process, airports are not required to consult with local stakeholders. However, given the sensitivities which surround night flights and the very direct community impacts resulting from the proposed trial, I believe that, as a minimum, we should be provided with full responses to all of our concerns together with an opportunity to discuss these responses directly with the airport.

I detail below the concerns we have raised:

1. Number of Night Trial Flights – Gatwick’s original Statement of Need indicated that circa 1,150 flights would participate in the six-month trial. We have always been informed by Gatwick, that nightly trial flight numbers would range from 5 – 15, numbers which was supported by Gatwick’s website which stated “Some nights only a handful of aircraft will take part in the trial. At most the trial will involve around 12 to 15 aircraft a night”. However, with the trial now being scheduled for Mar – August 2020 and Gatwick’s continued insistence on the accuracy of their flight numbers, we felt it appropriate to complete our own analysis of night flight numbers. This we have done (3 months to end August) and it is clear that the total number of flights will be substantially greater than that suggested by the airport and is very likely to be closer to 2,500. The average number of trial flights per night is in excess of 20, double Gatwick’s suggested figure and total nightly trial flights range up to 48 per night, not 15 as Gatwick continue to suggest. It is evident that the trial flight numbers currently being quoted by Gatwick are substantially underestimated and are therefore highly misleading.

	June	July	August	3 Months
Total No. of Night Flights	1,553	1,902	1,827	5,282
Total No of Trial Flights	527	725	663	1,915

Average Trial Flights per Night	18.2	23.4	22.1	21.3
Range of Trial Flights	8 - 30	12 - 48	11 - 40	8 - 48

2. Period of Trial - the scope and purpose of the trial has changed significantly from when it was first proposed some 18 months ago. Taking account of both the additional flight concentration and the increased number of arrival flights, we have requested that the trial does not take place over the busiest summer months. However, despite raising these concerns, the airport appears to be targeting a March to August 2020 trial i.e. during the airport's busiest period.

3. Noise Benefits - we would question whether the trial will provide any near-term benefits for residents. The original stated purpose, was to discover whether PBN can reduce noise by eliminating outliers in distribution of altitudes. The fact that PBN can very accurately control height is not disputed. From other trials it's already evident that height profiles can be effectively managed, so in our view, there is no need to have a trial to establish the noise benefits at Gatwick. These benefits could more easily be determined via a desktop modelling exercise which would ensure no community impact. It is clear to us that the core purpose of the trial is not to determine potential noise improvements, but as Gatwick has said, is to "further develop the NMB's understanding of arrivals PBN" and 'identify and address the planning, implementation and operational challenges associated with PBN arrival transitions and inform future planning.'" Following completion of the trial (August 2020) arrivals will return to using current vectoring protocols with no change in operational procedures and therefore zero noise benefits for communities. It's therefore evident that, rather than delivering noise benefits for residents, the real purpose of the trial is to help shape the airport's arrivals strategy as part of the longer-term FASI(S) airspace modernisation programme.

4. Flight Concentration - The RNN Trial will result in both increased lateral and vertical concentration. The trial is predicated on locating the PBN arrival routes over those areas already receiving the bulk of night flights, so as a direct result, these unfortunate residents are going to suffer even greater sleep deprivation together with the associated adverse health impacts. From a vertical concentration perspective, there will hopefully be less planes flying at low altitudes, but we would also assume that any planes flying too high will reduce altitude. To date, Gatwick have provided no data on programmed approach altitudes and we are therefore concerned that average arrival altitudes may actually worsen.

5. Trial Routes - despite numerous requests for greater detail re the proposed routes, we are yet to receive maps with the necessary topography to determine the impacts on individual communities. The maps seen so far do not have the appropriate level of detail and, from what we have been told, we are only likely to see the necessary data after the trial has been approved by the CAA.

6. Community Engagement – the community engagement process in relation to the RNN Trial has failed. We would not dispute that the trial has been discussed on numerous occasions, but discussions have been sporadic and have lacked the necessary continuity to facilitate an effective sharing of viewpoints. At the Noise Management Board meeting held on 9th January, 2019, Gatwick committed to arranging a separate session to address all remaining community

concerns. This has never materialised. It is clear that Gatwick's focus is to proceed with the trial in order to enhance their understanding of PBN based operations. As a consequence, it feels as though we are being "talked to" rather than being "listened to".

In summary, we feel that we have raised very legitimate concerns relating to what would be a highly significant trial. There are very many things wrong with this trial, from its objectives, its basic concept, its timing and not least the negative health impacts the increased night flight concentration will have on the communities already bearing the brunt of Gatwick night flights. On that basis, we would request that Gatwick's proposed Reduced Night Noise trial does not proceed, but rather you instruct the airport to engage with communities, as they have previously committed to do, allowing our on-going concerns to be addressed.

We look forward to your feedback.

Yours faithfully

Atholl Forbes
Chair - PAGNE
People **A**gainst **G**atwick **N**oise and **E**missions