

Tony Kershaw  
Honorary Secretary

County Hall  
Chichester  
West Sussex  
PO19 1RQ



Gatwick Airport Consultative Committee

Telephone 01243 752703  
Website: [www.gatcom.org.uk](http://www.gatcom.org.uk)

---

If calling ask for  
Mrs. Paula Street  
e-mail: [paula.street@gatcom.org.uk](mailto:paula.street@gatcom.org.uk)

5 November 2012

Dear Stewart,

### **PRNAV DEPARTURE SID IMPLEMENTATION AT GATWICK**

GATCOM welcomes the opportunity to comment on GAL's consultation on the implementation of P-RNAV (precision area navigation) departure SID routes at Gatwick.

#### **General Overview**

In principle a significant majority of GATCOM members have no objection to the implementation of P-RNAV on all the departure SIDs at Gatwick in advance of the national implementation post 2018. The concentration of flight paths is in accordance with current Government policy which states that the balance of social and environmental advantage lies in concentrating aircraft taking off from airports along the fewest possible number of specified routes and that these routes should avoid densely populated areas as far as possible. It also reflects the CAA's current flight procedure policy in that P-RNAV should become the standard for flight in the future in the London Terminal Airspace when conventional navigation procedures (including SIDs) are to be withdrawn from around 2018. P-RNAV therefore reinforces the Government's policy of concentration but to an extreme as in future all flights will be concentrated over the same line rather than spread over a 3km wide swathe of the noise preferential route (NPR). GATCOM acknowledges that this will mean that for those living directly under a P-RNAV line the disturbance currently suffered will increase.

GATCOM welcomes the provision to enable a P-RNAV route to be permanently withdrawn and traffic reverted back to the conventional procedure if it is deemed to have a significant detrimental impact on communities. This is an important feature and will give confidence to local communities that the routes being flown during the interim period can be reconsidered.

It is noted that only a small percentage of aircraft are currently flying the P-RNAV routes in part because this trial procedure is not currently flight planable. There is concern that

#### **Via Email**

Stewart Wingate  
Chief Executive Officer  
Gatwick Airport Limited  
Gatwick Airport  
West Sussex  
RH6 ONP

without significant take-up by airlines of the P-RNAV procedure, it will mean that the monitoring of implementation over the next few years will not provide meaningful data on which to base decisions for the future. GATCOM therefore requests that GAL raise the importance of the matter at the Flight Operations Performance and Safety Committee and to try to encourage airlines at Gatwick to adopt the procedure and revise their flight plans. It is also suggested that GAL raise this matter with the CAA.

### **Management Oversight**

GATCOM recognises that the implementation of P-RNAV ahead of 2018 will provide GAL, NATS and communities with a unique opportunity to monitor the implementation over the next few years to determine whether the P-RNAV routes being flown are the right routes within the NPR swathe. The proposed management oversight set out in the consultation document is supported. GATCOM would however welcome more details about the criteria to be used if it is decided that a P-RNAV route needs to be permanently withdrawn because of the detrimental effect it had on the communities overflowed.

GATCOM welcomes the fact that GAL will be able to feed the results of its monitoring and recommendations into the development of the wider national P-RNAV roll out in 2018. GATCOM would like to be kept informed of the results of the monitoring and GAL's recommendations prior to them being fed into the national development programme.

As part of the management oversight, GATCOM feels it is important that a full assessment of the noise and disturbance impact is measured and explained to those under the NPRs over the next few years so that in 2018 when P-RNAV is fully implemented nationally, an informed decision can be made on the future NPRs and what mitigation or amelioration schemes are required for those who suffer the negative impacts. In order to give confidence to communities it is suggested that GAL considers the appointment of a suitably qualified Acoustic Consultant to calculate or measure the relative gains and losses in conjunction with NATMAG and the Gatwick Noise Monitoring Group.

In addition to this, some communities are concerned about the impact P-RNAV will have on air quality. GATCOM therefore suggests that GAL, through NATMAG considers whether there is potential for increased concentration of pollution levels and whether there is a need to undertake specific air quality monitoring.

### **Mitigation and amelioration**

As mentioned above, there are very few departures flying P-RNAV at present so residents on the ground will be experiencing little difference. However over the next 5 years as the take-up of P-RNAV slowly increases those communities directly under the flight line will begin to notice the difference. It will then only become clear whether the routes being flown are right and avoid the most populated areas. GATCOM acknowledges that although P-RNAV will bring significant improvements to some communities because overflight will be reduced, some individuals will be impacted by noise disturbance more frequently due to the concentration of tracks and improved accuracy. Consideration therefore needs to be given to ways in which the impact can be mitigated and what amelioration schemes could be put in place. GATCOM therefore requests that GAL and the CAA give consideration to this.

We trust our views will be taken into account.

Yours sincerely,



Assistant Secretary