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Date 5 April 2019

Dear Sir/Madam

**Airspace Modernisation - Gatwick Airport
An Introduction to Design Principle Development**

Thank you for the opportunity to engage with Gatwick Airport, in developing the design principles that will shape changes linked to the modernisation of the airspace over the South East of England (FASI-South).

Tonbridge and Malling Borough Council is concerned about impacts upon local communities that are overflown by aircraft below 7000ft. Any improvements that are implemented in due course, to ensure that communities in our borough are not overflown at low level would be welcomed.

Please find below our response to the questions that are set out in the airspace modernisation document (March 2019). Please note that this is an officer level response. Our members will be updated on this matter at the next meeting of our Planning and Transportation Advisory Board to be held in June.

We look forward to hearing further from you regarding this matter.

Yours sincerely

Bartholomew Wren
Principal Planning Officer

Questions

1a - Do you agree that airspace design must be safe and further promote safety management systems? **Yes**

Additional comments: TMBC has no further comment.

1b - Should 'Safer by Design' attract the highest design principle priority? **Yes**

Additional comments: TMBC has no further comment.

2 - Should Gatwick adopt the most beneficial form of enhanced navigation standards as the foundation of its designs? **Yes**

Additional comments: As long as this is also beneficial to over flown communities, allowing departure and arrival paths to be optimised below 7000 ft.

3 - Should Gatwick adopt a design principle that offers long term predictability of flight paths and enables beneficial system adaptations? **Yes**

Additional comments: It is helpful for statutory partners and local communities to have a predictable understanding of flight paths.

4 - Should Gatwick adopt a design principle that seeks, through its airspace design, to promote the adoption of enhanced aircraft capabilities that benefit communities and the more efficient management of air traffic? **Yes**

Additional comments: As long as these are proven safe by international regulatory bodies and the CAA. Nobody wishes for a repeat of the recent 737 Max 8 incidents, or similar due to a technical fault with complex on-board systems.

5 - Should Gatwick adopt a design principle that seeks to deconflict by design all Gatwick arrival and departure routes below 7000 feet to reduce the prevalence of overflight of a community by airport traffic on different routes and/or by neighbouring airport traffic? **Yes**

Additional comments: It is anticipated that in practice this could be difficult to achieve, as all local authorities in the South East are challenged with the requirement to accommodate significant housing and employment growth. In considering routes below 7000ft, Gatwick and NATS need to have an awareness of existing and proposed communities, which are identified in Local Authority development plans.

6 - Should Gatwick adopt a design principle that seeks to create an arrival route design compatible with time based operations? **Yes**

Additional comments: TMBC has no further comment.

7 - To what extent should London Gatwick consider multiple pathways on:

(a) Departure procedures – yes, subject to further consultation with partner organisations and use of enhanced navigation standards.

(b) Arrival procedures – yes, subject to further consultation with partner organisations and use of enhanced navigation standards.

8 - In what order would you prioritise these 5 overflight management options?

A (2) B (1) C (3) D (5) E (4)

9 - Are there other options we should consider and how would you prioritise them relative to your response to Qu 8? Option B is preferable, even if this may not result in the most direct flight paths below 7000ft.

10 - Where on the spectrum of A – E would you wish Gatwick airport to prioritise these factors? A () B () C (X) D () E ()

11 - Where on the spectrum of A – E would you wish Gatwick airport to prioritise operational resilience? A () B () C (X) D () E ()

12 - What are your top 5 Airspace Modernisation objectives?

1 - E

2 - K

3 - A

4 - G

5 - H

13 - What other Airspace Modernisation objectives do you believe we should consider?

TMBC has no further comment.

14 - What other design principles do you believe we should consider and why?

TMBC has no further comment.