

## Summary of oral representation at Open Floor Hearing 2 May 2024

Ed Winter representing Plane Wrong.

Plane Wrong is a community noise group, formed in 2014 in response to the noise impact caused when Gatwick introduced Performance Based Navigation (PBN) departures.

In simple terms, PBN, being far more accurate than conventional navigation, means that all aircraft follow pretty much exactly the same path through the sky as opposed to earlier systems giving a level of dispersion of actual tracks. The predictable accuracy of PBN provides greater traffic capacity within airspace.

Prior to the introduction of PBN, the majority of residents in the Gatwick area were pretty tolerant of the noise associated with Gatwick. But things have changed since that time with numerous Community Noise Groups forming to voice concerns over noise both on departure and arrival routes. The volume of flights has also grown over that period. I will cover the issues created to the north of Gatwick but other groups could give similar accounts of other areas.

Our approximately 600 members reside in a primarily rural area including ANOBs to the North along Gatwick departure Routes 3 and 4. One of these routes is always in use, so that means that many of our members get absolutely no respite at all from aircraft noise.

Route 4 is Gatwick busiest departure route, carrying around 30% of annual departures and is in use for approximately 2/3rds of the time. That means that when Route 4 is in use roughly half of all departures fly along Route 4. Similarly, Route 3 carries around 10% of annual departures and is in use for approximately 1/3rd of the time. That means that when Route 3 is in use roughly 30% of all departures fly along Route 3. At ISH 5 the Applicant stated that the proposal is based on the intensification of current routes, therefore we assume that the proposal is to significantly increase the number of flights using this route. If this proposal is allowed, in order to derive the planned benefits, the Applicant will need to optimise the rate of departures. When the Westerly runway is in use, especially at peak periods, Route 4 will need to be used at its maximum potential - that will mean one flight every three minutes for long periods of time. In order to achieve this, the

applicant will need to reintroduce a PBN departure procedure on Route 4. The overall effect will be creation of an intense noise corridor along the route with residents facing an absolutely intolerable increase in noise.

A further consideration is that Route 3 and 4 fly along the narrow corridor of airspace between Gatwick and Heathrow. Gatwick aircraft are restricted to low levels - 4000ft and below where noise is deemed to be the highest priority by government when considered air routes – this is to allow Heathrow to use the airspace above.

Fitting even the current level of traffic into this hugely crowded airspace creates very significant environmental issues. Attempting the proposed increase in traffic in this already overcrowded airspace is total folly.

The leisure traffic market, and in particular the low-cost airline market, is Gatwick's dominant customer. There may be a business traffic element to the low-cost airline passenger inventory but it is small. The leisure travel market has a very high price elasticity and the low-cost airlines, with their highly honed skills in dynamic pricing, are experts at creating demand from out of nowhere. If the pricing and marketing messages are right, passengers can very easily be drawn into making journeys that they hadn't even thought about before. There are 2 other significant low-cost airports serving London – Stansted and Luton. There is also plenty of capacity available at regional airports throughout the UK. It would appear that Gatwick's proposal is to draw passengers from Stansted and Luton's catchment areas as well as from further afield in the UK. This proposal is not based on predicted natural demand from Gatwick's catchment area the South East – it is based on the ability to create new demand. This would be environmentally totally wrong and absolutely unfair on the residents around Gatwick, forced to suffer the very significant environmental effects of the proposed expansion in order for Gatwick's shareholders to reap the benefits of drawing traffic from throughout the UK.

Gatwick should not be permitted to grow unless and until it is able to demonstrate that it could do so whilst at the same time reducing, in a proportionate and balanced way, all adverse environmental, noise and other impacts of any growth.

If the proposal is allowed everything that can be done to alleviate the environmental noise impact should be done:

- All departure and arrival routes should have an element of dispersal to avoid intense noise corridors
- and night flights should be banned for a full 8-hour period.

Thank You