

**Withyham Parish Council**

**Response to Gatwick consultation – deadline 14<sup>th</sup> August**

**For questions 1 AND 2 I suggest we tick other and write:**

**Questions 1a, 1b, 1c & 1d do not affect Withyham Parish and its residents, therefore the Council is not responding to these questions.. and**

**Question 2a, 2b, 2c & 2 d do not affect Withyham Parish and its residents therefore the Council is not responding to these questions.**

**Question 3a: Should we seek changes to the current DfT noise abatement requirements, so that the proposed night-time arrival respite route for RWY26 could be implemented (as shown in Map 34 and Map 35)?**

Yes – definitely

Yes – probably

No – probably not

No – definitely not **X**

Don't know

**Question 3b: Which, if any, factors do you believe to be the most important for us to consider when determining whether to seek changes to the current DfT noise abatement requirements, so that the proposed night-time arrival respite route for RWY26 could be implemented?**

Noise in the day that impacts my quality of life

Noise at night that disturbs my sleep **X**

Noise in the day that affects my business or company /the business or company within which I work

Noise at night that affects my business or company / the business or company within which I work

Noise in the day that affects a community facility (e.g. hospital) **X**

Noise at night that affects a community facility (e.g. hospital) **X**

Noise over the countryside in the daytime

Noise over the countryside at night **X**

Noise over populated areas in the daytime

Noise over populated areas at night **X**

Noise over Areas of Outstanding Natural Beauty or National Parks **X**

Noise that impacts my health **X**

Potential noise impact on house prices

Potential noise impact on local tourism

Other – please specify **X**

All items ticked have been issued raised with the Council. If the height of aircraft is lowered as proposed by the suggested respite option all the above issues would be of enormous importance to our population.

None of these

Don't know

**Question 3c: What, if any, comments or suggestions do you have about the proposals for us to seek changes to the current DfT noise abatement requirements, so that the proposed night-time arrival respite route for RWY26 could be implemented?**

Withyham Parish Council does not support any change to rules that allows flights to arrive throughout the night. The Council does not support any change that allows arrival flight paths to be more concentrated than they are today on a narrow band flying continually over the same area. Withyham Parish Council does not support the proposal that the concentrated narrow flight paths should swap from one part of its Parish to the other. Noise abatement changes should only be considered if they form part of multi respite option on a broad swathe as has historically been operational.

The consultation admits that “no noise preferential routes for arrivals have been defined and therefore there is no consistent basis for performing population counts”. The Council therefore cannot understand how Gatwick can consider seeking changes to noise abatement requirements without first considering where the arrivals will go and who will be affected. It seems to be a licence to do what Gatwick wants without any checks or balances.

The Council believes that that the effect of changes of the noise abatement requirements will allow aircraft to be unacceptably lower severely impacting the population of Withyham with or without respite.

**Question 4a: Should Gatwick Airport seek changes to the current DfT noise abatement requirements, so that the proposed night-time arrival respite route for RWY08 could be implemented (as shown in Map 38 and Map 39)?**

**Yes – definitely**

**Yes – probably**

**No – probably not**

**No – definitely not**

**Don't know** **x**

**Question 4b: Which, if any, factors do you believe to be the most important for Gatwick Airport Ltd to consider when determining whether to seek changes to the current DfT noise abatement, so that the proposed night-time arrival respite route for RWY08 could be implemented?**

**Noise in the day that impacts my quality of life**

**Noise at night that disturbs my sleep**

**Noise in the day that affects my business or company /the business or company within which I work**

**Noise at night that affects my business or company / the business or company within which I work**

**Noise in the day that affects a community facility (e.g. hospital)**

**Noise at night that affects a community facility (e.g. hospital)**

**Noise over the countryside in the daytime**

**Noise over the countryside at night**

**Noise over populated areas in the daytime**

**Noise over populated areas at night**

**Noise over Areas of Outstanding Natural Beauty or National Parks**

**Noise that impacts my health**

**Potential noise impact on house prices**

**Potential noise impact on local tourism**

**Other – please specify** **x**

**This does not directly affect the Parish**

**None of these**

**Don't know**

**Question 4c: What, if any, comments or suggestions do you have about the proposals for Gatwick Airport Ltd to seek changes to the current DfT noise abatement requirements, so that the proposed night-time arrival respite route for RWY08 could be implemented?**

This does not directly affect the Parish.

**Question 5a: Should Gatwick Airport Ltd re-centre and narrow the published NPRs to take account of aircraft performance on the modern PBN routes in place at Gatwick Airport?**

**Yes – definitely**

**Yes – probably**

**No – probably not**

**No – definitely not x**

**Don't know**

**Question 5b: Which, if any, factors do you believe to be the most important for us to consider with respect to re-centring and narrowing published NPRs to take account of aircraft performance on the modern PBN routes?**

**NPR swathes should only cover areas that are likely to be directly over-flown**

**NPR swathes should indicate potential noise impact from over-flights of nearby areas x**

**NPR swathes affect house prices**

**NPR swathes affect the local economy/investment in the area**

**NPR swathes affect tourism**

**Other – please specify**

**None of these**

**Don't know**

**Question 5c: What, if any, comments or suggestions do you have about the proposals for Gatwick Airport Ltd to consider re-centring and narrowing published NPRs to take account of aircraft performance on the modern PBN routes (please provide any views you have on what the optimal width for NPR swathes should be)**

The narrowing of the flight path width will directly impact on the quality of life of the Parish, with or without respite. The Council does not accept that narrow band widths cannot be within a wider swathe. PBN routes are accurate therefore it should be possible to use several variations within the historical wider swathe reducing the impact on any particular part of the population.

**Question 6a: Should we implement shortened NPRs to take account of the observed climb performance of the flights at Gatwick Airport?**

**Yes – definitely**

**Yes – probably**

**No – probably not**

**No – definitely not**

**Don't know**

**Question 6b: Which, if any, factors do you believe to be the most important for us to consider when determining whether to implement shortened NPRs to take account of the observed climb performance?**

**NPR swathes should only cover areas that are likely to be directly over-flown**

**NPR swathes should indicate potential noise impact from over-flights of nearby areas**

**NPR swathes affect house prices**

**NPR swathes affect the local economy/investment in the area**

**NPR swathes affect tourism**

**Other – please specify**

**None of these**

**Don't know**

**Question 6c: What, if any, comments or suggestions do you have about the proposals for Gatwick Airport Ltd to consider when determining whether to implement shortened NPRs to take account of the observed climb performance of the flights at the Airport?**

This does not directly affect Withyham Parish as described in the consultation document

**Question 7a: The existing PBN route for RWY26 DVR/CLN/LAM departures means that aircraft fly outside the NPR; should we re-centre and narrow the published NPR to correct this anomaly?**

**Yes – definitely**

**Yes – probably**

**No – probably not**

**No – definitely not**

**Don't know**

**Question 7b: Which, if any, factors do you believe to be the most important for us to consider, with respect to correcting the published NPR for the RWY26 DVR/CLN/LAM route, so that it captures where aircraft actually fly?**

**NPR swathes should only cover areas that are likely to be directly over-flown**

**NPR swathes should indicate potential noise impact from over-flights of nearby areas**

**NPR swathes affect house prices**

**NPR swathes affect the local economy/investment in the area**

**NPR swathes affect tourism**

**Other – please specify**

**None of these**

**Don't know**

**Question 7c: What, if any, comments or suggestions do you have about the proposals for us to consider, with respect to correcting the published NPR for the RWY26 DVR/CLN/LAM route, so that it captures where aircraft actually fly?**

Any changes should be within existing NPR's

**Question 8a: Should Gatwick Airport Ltd consider NPR swathes with variable widths, dependant on sharpness of turns on each route, as a more accurate portrayal of where aircraft actually overfly?**

Yes – definitely

Yes – probably **x**

No – probably not

No – definitely not

Don't know

**Question 8b: Which, if any, factors do you believe should be the most important for us when considering NPR swathes with variable widths, dependant on sharpness of turns on each route, as a more accurate portrayal of where aircraft actually overfly?**

NPR swathes should only cover areas that are likely to be directly over-flown **x**

NPR swathes should indicate potential noise impact from over-flights of nearby areas **x**

NPR swathes affect house prices

NPR swathes affect the local economy/investment in the area

NPR swathes affect tourism

Other – please specify

None of these

Don't know

**Question 8c: What, if any, comments or suggestions do you have about whether we should consider NPR swathes with variable widths as a more accurate portrayal of where aircraft actually overfly?**

And when showing flight paths diagrammatically, indicate flight paths in different colours in six hour period to help proper balanced approach to planning and analysis

**Question 9: What, if any, additional comments do you have that are relevant to this consultation and that you would like to make?**

The east part of the parish is directly under the proposed day flight path and the west part of the parish would be directly affected by the respite option.

The Council notes that no population assessments have been done prior to making this proposal. Withyham Parish Council is appalled that a potential life altering and health damaging decision is being proposed without any proper assessment of the effect on the people most affected. The Council question whether this is in fact a proper consultation due to the lack of definitive information on the narrowed flight paths.

It is the view of the Council that very little if any value has been placed on the fact that the whole of the proposed route over Withyham Parish lies in an Area of Outstanding Natural Beauty, the highest designation after national park with many SSSI's protected by European Habitats regulations.

Withyham Parish is aware that the suggested height for aircraft over such an area is over 7,000 feet, save in exceptional circumstances. No aircraft arriving at Gatwick is following that recommended height over Withyham Parish. Exceptional in normal parlance does not mean every.

For the last two years the Council has been receiving complaints about the increased frequency of flights (including broken sleep patterns and an inability to quietly enjoy their gardens and homes during the day). Whilst this is being denied by Gatwick, flight tracker devices are showing a consistent narrow flight path over Groombridge and a low trajectory, in fact sometimes below 4,000 feet and way below 7,000 feet. Flights have always come over this area and the population of Groombridge and its environs have lived with the noise and disruption of the historical flight paths due to the fact that the low flight path was occasional not constant. The Parish Council does not oppose any flights over its area, just the proposal for narrow band width within a narrow swathe. Narrow flight bands will only be acceptable if these are moved within a broad swathe at high altitude so as to not affect the same population every day. The periods for each flight path should be evenly distributed throughout the swathe.

At the edge of our Parish in Groombridge Old Village lies Burrswood Hospital for recuperation of patients as well as the care of the terminally ill. In addition the Horder Centre, a hospital renowned for joint replacements and care throughout the country is situated in St John's Crowborough. Each of these important health facilities will be affected by the proposed narrow flight paths.

In addition the Parish contains three primary schools, St Johns in Crowborough, St Michaels in Withyham and St Thomas' in Groombridge. It is the only Parish within East Sussex that has three Primary schools within its boundaries. The children who attend do and will have their education disrupted by continual noise pollution.

Withyham Parish Council believe that Gatwick have failed to place sufficient weight to the quality of life of any population living under a flight path or the effect that such a narrow aerial motorway would have on the health and well-being of the population of this Parish which will be severely affected. The Government recommend 57 (decibel) dcb 16 hour contour as average. The World Health Organisation recommend 50 to 55 dcb and 10 dcb lower at night. The relative tranquillity of an AONB makes the sound of low flying aircraft far more prominent than in a town and the Council urges Gatwick to apply the World Health standards as a minimum in the light of this fact and consider the weight it places on the quality of life of people affected by its indeterminate proposals. The proposal that appears to have been made by implication from the maps is that there should be a narrow NPR swathe directly over this Parish which would have an unacceptable impact on our residents during the day or at night.

Part of Withyham Parish lies within the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA). All planning issues in Withyham are affected by the European Habitats Directive which affects all decisions within 7 km of the Ashdown Forest. The Council note that no evidence has been gathered on the effect of the proposed changes to the nitrogen levels on the Forest and therefore no consideration has been given to the European Habitats Directive.