

To: Graham Lake, Gatwick Airport
Copy: Stewart Wingate, Andy Sinclair, Gatwick Airport
Copy: Irene Fairbairn, Angus Stewart, TWAANG, Tunbridge Wells

September 1, 2019

Dear Graham

Monitoring Gatwick's Promises: Air Traffic over West Tunbridge Wells

Thank you for your reply of August 21, 2019 in relation to my Third Annual Report sent to you on the 12th.

You accuse me of misrepresentation of Arrival Review recommendations, making assumptions which would risk an increase of noise disturbance, and making assertions wrongly stated as agreed by Gatwick. You also accuse me of creating metrics to serve a community agenda.

I had taken upon myself to document as factually and accurately as practical any trends that have occurred since the 2013 flightpath changes that inflicted the community in which I live. For this I had chosen publicly available data and supplemented it with my own observations, either derived from segments of that data, or through my own observations such as of the Airbus 'whine'. Any of this would have shown positive change towards your 2016 objectives had there been any. This has indeed been the case with the Airbus 'whine', as well as a gradual decrease in night-time over-spill percentage (which I did not herald and perhaps should have).

Since the publication of your 2016 promises I had focused on presenting the bottom line. I had therefore limited my latest reports to what I considered to be most important considerations for local communities newly exposed to arrivals noise in relation to key objectives stated in your 2016 Action Plan. These are (a) where and when the aircraft fly, and (b) how they are flying with respect to measures for noise abatement.

Hence:

1. Action Plan references Imm-6 and Imm-7 (CDA improvement)

In the Plan you refer to working with CAA and NATS in order to agree on CDA improvements. Both these bodies refer to a 3-degree descent angle (among other measures such as Low Power and Low Drag) for optimal noise abatement, and this angle happened to be followed (on average) by 30 other major airports I examined. It has a bearing on altitude, and the associated parameters, unlike Low Power and Low Drag, are readily available from flight data. I therefore maintain that I was not off-reservation in considering them.

Most importantly:

- Are you suggesting that a 3-degree descent angle (beyond the ILS line) is not relevant to noise perceived at ground level and will not apply to Gatwick?

- Are you suggesting that (all other factors being equal) lower altitude does not imply more noise perceived at ground level?
- Are you suggesting that (all other factors being equal) a shallower descent angle will not be detrimental to noise perceived at ground level?

If so for any of these, I stand to be corrected, but would request a clear explanation of your reasoning.

2. Action Plan reference Imm-10 (Aircraft vectoring)

I respectfully remind you of the very clear statements you made in the Action Plan with regards to anticipated improvements, namely:

“ . . . will increase the arrivals dispersal to more closely emulate the circumstances prior to 2013 change.”(Page 22 of the Final Action Plan),

and

“This recommendation is intended to reverse much of the aircraft concentration and noise consequences of the approach stabilisation initiative taken by GAL and NATS in 2013, thereby more closely emulating the distribution of arriving aircraft that occurred previously.” (Page 23 of the Final Action Plan).

These statements were addressed to all communities newly affected since 2013 (most of whom had made representations to you and were recipients of the Action Plan), not just those closest to the ILS.

I therefore compared flight concentration patterns from year to year following your Action Plan. I chose a specific swathe relevant to West Tunbridge Wells. Gatwick's claims of improvement have been dispelled for this swathe. The above stated objectives have not been met for West Tunbridge Wells. Period.

Furthermore:

- With respect to Government Policy regarding community exposure, are you claiming that the original 2013 flightpath changes *did not* ignore it when exposing tens of thousands more residents to aircraft noise?
- With respect to my assertion that alternative flightpaths are available during summer night hours for the 25 or so that directly cross Tunbridge Wells, are you saying that ‘tromboning’ routes, such as daily practiced outside the ‘night quota period’, and often during it, cannot be more systematically employed so as to avoid population centres?

If so for any of these, I stand again to be corrected, but once again I would request a clear explanation of your reasoning.

3. Action Plan reference Imm-12 (Spill-over):

I respectfully remind you of the equally clear statement you made in the Action Plan, which I used as a basis for my comparisons, as follows:

“The objective is to reduce the numbers of late arrivals . . .” (Page 39 of Final Action Plan).

Most importantly:

- Are you suggesting that I should have looked at an alternative timeslot to the one I used because the results would have been different?
- Have you seen anywhere in the report where I have commented on the number itself of night flights as you claim?

If so for any of these, I stand again to be corrected, but I would again request a clear explanation of your reasoning.

Finally, I would like to thank you for your offer to collaborate in the future, which I decline. My sole intention remains to factually report on what I believe communities in West Tunbridge Wells experience and to do so from independently available data. Your 2016 Action Plan gave us hope. Gatwick has so far achieved precious little. The feedback I receive convinces me that the majority view is that we have been totally deceived.

Sincerely

Edward Crutchley