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FREEPOST
ROUTE 4 CONSULTATION.

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14 April 2026

Dear Sirs

London Gatwick Route 4 Airspace Change Consultation (ACP-2018-86)

I am writing on behalf of Salfords and Sidlow Parish Council (S&SPC) who is elected to represent and respond on behalf of all our residents (1485 properties and over 2700 electors). Gatwick Airport is about 3 miles south from both villages and Route 4 flies over the Parish.

I can confirm that Parish Councillors have visited the website and reviewed all documents, attended exhibition events at Reigate Manor and Denbies Wine Estate and we also joined the consultation webinars.

We have answered your questions in line with the numbering for your online consultation.

Question 9 – Order of preference
We have ranked the four shortlisted options in order of preference with 1 being our most favoured option: -
1 – Option A
2 – Option B
3 – Option C
4 – Option D

Question 10 - Explain your response to Question 9

This ACP had to be carried out due to the acknowledged failure of the previous change to meet the original stated intention which was to replicate the conventional route. This is explained in CAP 1912 'Report of the CAA's Decision on the Post Implementation Review of London Gatwick's Airspace Change Proposal – Runway 26 Route 4 RNAV-1 Standard Instrument Departure Procedures' and summarised in its paragraphs 39 and 40

> *39. As a result of our analysis in determining that the modified Route 4 RNAV 1 SID implemented on 26 May 2016 is not a satisfactory replication of the Route 4 conventional SID, the ACP submitted by Gatwick Airport on 30 November 2012 relating to the Route 4 RNAV-1 SIDs (and as modified in accordance with the CAA's decision of 11 November 2015) is rejected.*
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> *40. The CAA has concluded that the Route 4 RNAV-1 SID has not achieved, to an acceptable standard, its original stated aim.*

The consultation document says the ACP seeks to replicate as closely as possible the existing route and minimise newly overflown people. Option A is our strongly preferred Option because it is the closest to the existing route and close to the legacy route and minimises newly overflown people.

The legacy route over Salfords and Sidlow gives minimal deviation from people's experience now and from 2012.

Option A also delivers many of the same environmental and noise benefits claimed for Option B while remaining closer to the established Route 4 corridors, thereby avoiding the same degree of impact redistribution.

We note that Option B is shown as performing more strongly in monetised terms against Gatwick Airport's stated design principles and modelling, and on that basis this could be our fallback option. However, Option A presents a more practical and balanced solution. It is less likely to create conflict between communities, avoids unnecessary polarisation, and aligns more closely with how the CAA typically applies its decision-making framework, ie considering proportionality, fairness, and not solely modelled outputs.

Option C's programmed dispersal at the turn means flying over different people at different times. It does not replicate the current or legacy routes. It is not an acceptable Option

Option D does not come close to replicating the legacy route and should therefore be discounted. It is not clear why this was included in the first place. Its only supposed benefit is in monetised terms. All four options fly similar distances but the monetised numbers make Option D so different in terms of CO2 and fuel burn. Option D appears to be 100 times better than Option A in terms of noise. This change in noise can only be from flying over fewer people but the methodology for this uses blocks of dwellings in post codes and cannot be relied on to give precise or meaningful results. This change also means flying over people not previously overflown.

The monetised numbers only have any meaning if the tracks for each option are followed precisely. Gatwick, the CAA and NATS are fully aware that this isn't the case for the authorised tracks now, nor would they be in future. Modifications to take off procedures have significantly reduced that amount of time aircraft spend below 4000 feet and Gatwick's own published data shows how NATs already send the majority of aircraft outside of the authorised tracks now. Gatwick has ignored the impact of vectoring in this calculation rendering it misleading for the purposes of decision making. We also note that monetisation is not based on a real-time calculation of actual aircraft flying, but rather a more unrealistic assessment of future unknown patterns which cannot be relied upon.

Also they only apply to a very short section of the overall route travelled and amount to a tiny percentage and well within the bounds of any margin of error.

Councillors believe the most crucial point to stress is not flying over new people. This is in two of the eight Design Principles compared to reduce the total number of people overflown which is only stated once.

It should also be made clear that none of the Options goes close to the towns of Reigate or Redhill and have no effect on them.

For these reasons Option A is the logical and defensible choice across all affected areas.

Question 11 - feedback or suggestions on how we can deliver further improvements on Option A

The Full Options Appraisal says it is intended to replicate, as closely as possible, the existing LAM 6M, 6V procedure which relies on ground-based navigation aids which will soon be withdrawn.

The 'Shaping the Future' document shows Option A 'follows the path over ground of the nominal track of the existing conventional procedure as closely as possible'.

Question 12 - feedback or suggestions on how we can deliver further improvements on Option B

Option B appears very similar to Option A in practical terms. Its higher monetisation score is understood to arise from the assumption, outlined during the consultations, that it overflies fewer people. While the modelling shows a measurable difference in monetised impact, the actual flight paths are closely aligned, calling into question how meaningful that difference is in reality.

A similar pattern is seen in the reported emissions and fuel-burn benefits, where Option B is presented as performing better than Option A based on modelled outcomes.

This raises a broader concern about the weight given to monetisation metrics. These figures do not represent real financial costs but are derived from modelling assumptions, including idealised flight paths, consistent weather conditions, and perfect pilot performance. In practice, such conditions are rarely achieved, and therefore the outputs will not reliably reflect real-world operations.

Question 13 - feedback or suggestions on how we can deliver further improvements on Option C

Option C does not replicate the current or legacy routes and should be discounted.

Question 14 - feedback or suggestions on how we can deliver further improvements on Option D

Navigation precision represents the most significant change. The historic route from the 1950s was inherently dispersed, with aircraft following broadly similar paths rather than a single defined track.

By contrast, Option D uses Performance-Based Navigation (PBN), concentrating aircraft along a narrow corridor and introducing different turn geometries. As a result, Option D does not replicate the legacy route.

Option D also appears to be driven in part by monetisation considerations. In practice, most aircraft will not precisely follow the defined centreline but will operate within the wider shaded area to the west before making corrective adjustments to rejoin the intended track. These additional corrections are likely to increase both noise and fuel consumption, undermining the stated objectives of the proposal. Furthermore, once aircraft reach approximately 4,000 feet, they are likely to be vectored south, extending the geographic spread of noise.

The primary effect of Option D is to redistribute noise rather than reduce it overall. It introduces new and more concentrated overflight for communities that have historically experienced little disturbance, while also removing established periods of respite for others.

This appears to conflict with the consultation's stated Design Principles, which require that proposals should:

- minimise impacts on previously unaffected populations; and
- avoid introducing new overflight when seeking to provide respite.

In addition the quantified benefits of Option D are marginal. The projected fuel-burn improvement is approximately 0.02% overall, equating to only a few litres per flight. At this level, the outcome is highly sensitive to reasonable variations in assumptions such as traffic forecasts, fleet mix, and climb performance. The consultation does not provide sufficient sensitivity analysis to demonstrate that such a small benefit is robust enough to justify introducing permanent new impacts on previously unaffected communities.

Comparisons between Option D and the historic route are not meaningful in terms of real-world impact. The historic route operated with less precise navigation, lower traffic volumes, and different aircraft performance characteristics. In contrast, modern PBN concentrates flights into a narrow corridor with higher and more consistent traffic levels. Even where alignments appear similar on paper, the resulting noise exposure experienced by communities is fundamentally different.

Question 15 - Comments regarding the Full Options Appraisal (FOA) and/or the technical assessments supporting this Airspace Change Proposal?

We do not believe the supposed marginal improvements from Options C and D justify new harm which arise from them.

Has Gatwick Airport taken into account new housing development such as Westvale Park in Horley and future housing expansion requirements for land east and west of Salfords for a total of 1,600 homes?

Question 16 - Further feedback or suggestions you wish to share with us regarding this Airspace Change Proposal

Airspace changes across the Southeast of England are expected to be implemented between 2032 and 2035. Gatwick Airport has indicated that trial arrangements may begin as early as 2029 to inform final decisions. In this context, there is a strong case for maintaining the current Route 4 alignment rather than introducing changes now that may be revisited again within a short timeframe.

Early experimentation with alternative routes risks creating unnecessary uncertainty and confusion for affected communities. Given the anticipated wider airspace redesign in the early 2030s, introducing new concentrated overflight at this stage—based on only marginal differences between options—is difficult to justify.

The previous High Court decision on Route 4 highlighted the importance of preserving established traffic patterns where options are broadly similar in impact. In this consultation, differences between options—particularly in fuel burn and emissions—are relatively small. It is therefore unclear why an option that introduces new concentrated overflight and departs from existing patterns should be preferred over one that maintains them.

We have also noted claims that residents affected by low-level Route 4 departures during westerly operations are the same as those affected by Route 3 during easterly operations. This is not correct. Route 3 lies to the north of all Route 4 options, with its NPR ending just west of the

A217. Any overlap in impact is limited and not comparable to the effects being suggested. Relying on these claims risks distorting the assessment of impacts. Anything that leans toward support for aircraft to fly further south such as Option D conflicts with the stated Design Principles.

Option D bears no resemblance to the legacy route and is similar to the alignment previously challenged and removed following legal action. Supporting it on the basis of supposed shared impacts between Routes 3 and 4 overlooks key Design Principles, particularly the need to give due regard to historic routings and to minimise impacts on previously unaffected populations.

For these reasons, the most consistent and proportionate approach is to support an option that:
- maintains established patterns of impact; and
- avoids introducing newly overflown people where possible;
- delivers environmental benefits without disproportionate trade-offs.

On that basis, Option A is the only choice.

Summary

- Option A is our strongly favoured option as it closely replicates the existing route, minimising change and avoiding newly overflown people.
- While Option B scores better in modelling and design principles, differences from Option A are small and based on uncertain assumptions.
- Monetisation, fuel burn, and emissions benefits are marginal and rely on idealised modelling that may not reflect real-world operations.
- Key priority: avoid introducing overflight to new communities; this outweighs small reductions in total numbers overflown.
- Option D is strongly opposed as it concentrates flights, redistributes noise, and introduces impacts on previously unaffected areas.
- Supposed benefits of Option D are minimal (~0.02% fuel saving) and do not justify increased noise and loss of respite.
- Given wider airspace changes expected (2032–2035), maintaining the current Route 4 alignment is the most proportionate and consistent approach.

Yours faithfully

Claire Baller
Clerks to Salfords and Sidlow Parish Council