LONDON GATWICK

Shaping the future: have your say on London Gatwick's Route 4 Airspace Change

Stage 3 Consultation Document

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CAP 1616 Airspace Change Process

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Executive Summary

With over 40 million annual passengers, Gatwick Airport Limited (hereafter referred to as London Gatwick) is the UK's second busiest airport, providing a vital piece of national infrastructure. The operations of the airport and the airlines that carry these passengers rely on efficient and modern infrastructure both on the ground and in the sky.

London Gatwick is committed to continually improving the airport, investing and growing sustainably. It is also committed to working with local communities and stakeholders, ensuring that they are well informed on proposed changes and can continue to share in the benefits that London Gatwick delivers to the local community and wider economy.

London Gatwick is proposing to reintroduce satellite-based navigational procedures to Route 4 – one of its aircraft departure routes – through this airspace change proposal (ACP). This proposal is essential because the ground-based infrastructure which supports conventional navigation on Route 4 is gradually being phased out as part of a government-led drive to modernise airspace in the UK. All of London Gatwick's other arrival and departure routes which operate from the Main Runway have successfully adopted the new satellite-based navigation procedures.

This document outlines the options that have been shortlisted for Route 4 from earlier stages in the airspace change process, their potential benefits and impacts, and how you can take part in the consultation. London Gatwick is aiming to ensure everyone who wants to feedback has that opportunity and everyone's views are considered.

Following this public consultation, London Gatwick will use the public and stakeholder feedback to further evolve the Route 4 designs, before it selects a final option which will be submitted to the Civil Aviation Authority (CAA) for formal approval in the next stage of the airspace change process.

There is a complex history surrounding changes to Route 4 operations, as detailed in this Consultation Document. London Gatwick is committed to working with local communities and over the years has involved them in the development of the route options and Design Principles associated with this public consultation. London Gatwick looks forward to continuing this engagement with communities, industry officials and the CAA to progress this airspace change proposal.

If you would like to find out more about this consultation, please visit the Citizen Space consultation hub (route4acp.co.uk) where you can explore the proposals and provide feedback.

Thank you in advance for taking the time to consider London Gatwick's proposals. We look forward to hearing from you before the consultation period ends on 28 April 2026.

The Route 4 Project Team

1 Introduction

1.1 Background to this airspace change proposal (ACP)

1.1.1 UK airspace was designed in the 1950s using now outdated ground-based navigation technologies, also known as conventional navigation procedures. Since then, new navigational procedures – which use modern, satellite-based technology – have been introduced as part of a government-led drive to modernise airspace in the UK.

1.1.2 Due to these changes, all UK airports have been required to review and, in some instances, make changes to their airspace design. For London Gatwick, this has meant introducing satellite-based navigation procedures on all nine of the departure routes from its Main Runway so that aircraft can use the new technology to replicate the existing (or conventional) route positions.

1.1.3 To achieve this, in 2012, London Gatwick initiated a formal airspace change process, as defined and regulated by the CAA. The objective of this work was to introduce satellite-based navigation (or Performance Based Navigation (PBN)) routes that replicate the conventional ones as closely as possible.

1.1.4 In 2013, the introduction of the new Area Navigation (RNAV) procedures was approved by the CAA for all nine departure routes from the Main Runway at London Gatwick following an airspace change process and public consultation.

What is conventional navigation?
Conventional navigation uses ground-based navigation aids to guide aircraft. This form of navigation is being phased out as part of a government-led drive to modernise airspace in the UK.

What is Performance Based Navigation (PBN)?
PBN is the broad term used to describe the technologies that allow aircraft to fly flexible, accurate, repeatable and therefore deterministic three-dimensional flight paths using onboard equipment and capabilities.

What is Area Navigation (RNAV)?
RNAV enables aircraft to operate on any desired flight path using either satellite-based navigation, ground-based navigation, or a combination of the two. This flexibility allows for more efficient flight routes, reduced congestion, and improved access to airports without conventional navigation aids.

1.1.5 In 2015, the CAA conducted a Post Implementation Review of the changes to assess whether the new navigation procedures replicated the conventional procedures in practice.

1.1.6 The CAA approved most of the redesigned routes because the aircraft flying the redesigned routes were found to be following the track of the old routes. However, the CAA found that the track flown by aircraft on the redesigned Route 4 was, in some instances, up to 800m north of the Noise Preferential Route (NPR).

What is a Noise Preferential Route (NPR)?
An NPR is a track line on a map which aims to minimise the number of people overflown by departing aircraft. NPRs are set by the Government and have existed since the late 1950s, when the airports were in public ownership. NPRs are not within the scope of this consultation.

1.1.7 At the time, it was thought that this was due to a change in the earth's magnetic variation, caused by a shift in the earth's magnetic pole. This can change the position of the NPR because the NPR's and conventional routes are defined by reference to a magnetic bearing from a fixed ground position. If updates to different conventional procedures (e.g. NPRs, route definitions) are not coordinated, this may result in positional offsetting of routes in relation to each other, such as the case with Route 4 NPR and actual route. However, this was not the case and, because one of the key requirements of the airspace change in 2012 had been to replicate the existing routes as much as possible, the CAA concluded the changes to Route 4 had not delivered this objective and required further changes to be made.

1.1.8 Following the CAA's findings on Route 4, the redesigned route was further amended to follow the centre line of the NPR more closely. The CAA approved this following a Post Implementation Review in April 2017.

1.1.9 Then, in 2018, the community group 'Plane Justice' brought forward a successful legal challenge of the CAA decision which called for Route 4 to be returned to the conventional procedure it occupied up to 2012. The reason the CAA requested the Court quash its earlier decision can be read in full on the CAA's website[1], with a key extract set out below:

> *"Throughout the airspace change proposal (ACP) process commenced 30 November 2012 Gatwick Airport and the CAA accepted that magnetic drift was responsible for the displacement of traffic on Route 4 from the noise*

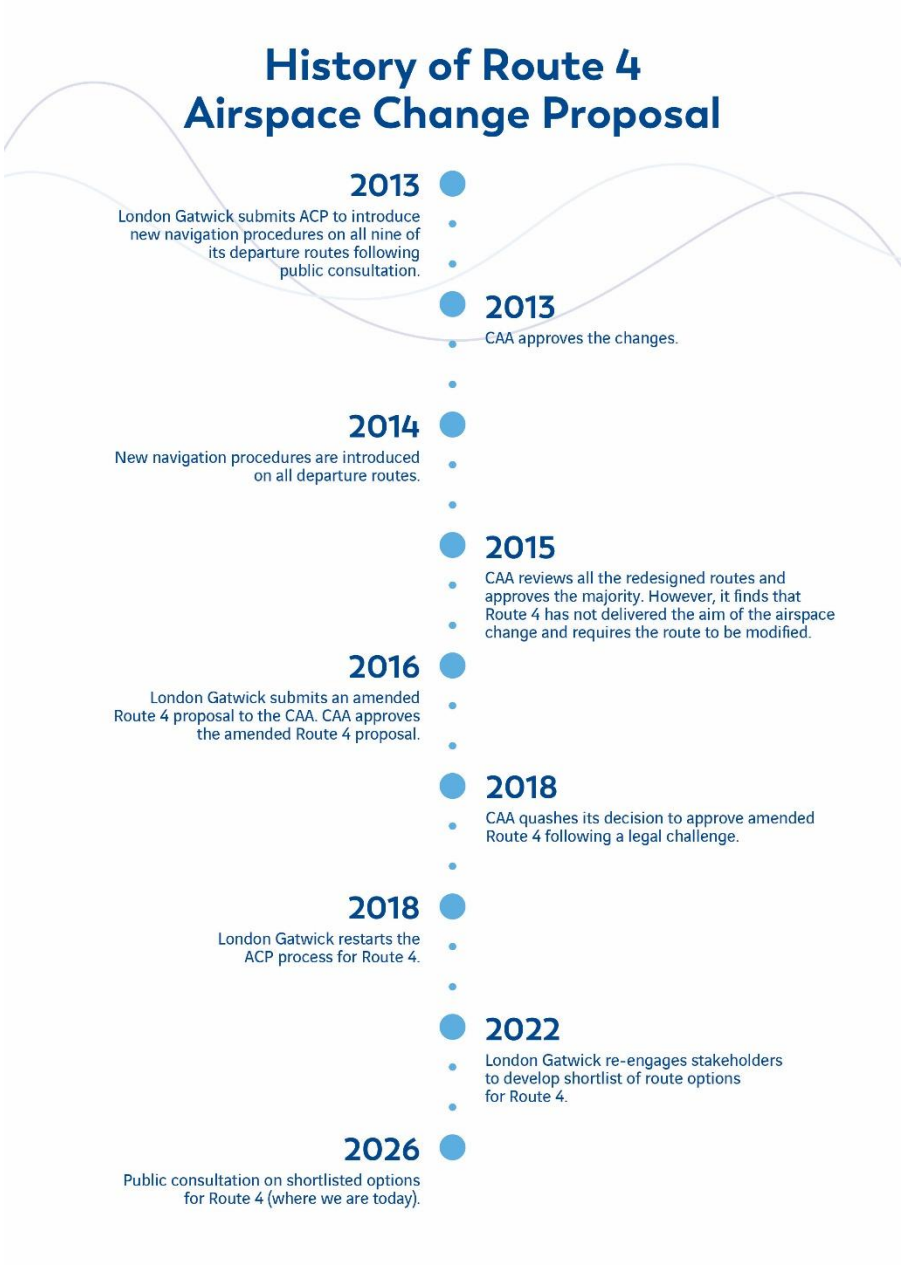
[1] CAP1531LETA: CAA letter to Gatwick Airport Limited dated 9 February 2018 | Civil Aviation Authority

preferential route (NPR). During the process of responding to litigation, the CAA has conducted detailed and lengthy investigations into the history of the conventional route and the changes that have occurred since records are available. In short, through that process, it has become apparent that magnetic drift was not the predominant factor causing displacement of Route 4 from the NPR. The CAA considered that it could not allow its decision to stand where such decision was based upon a misunderstanding of the relevant facts."

1.1.10 In December 2019, following the outcome of this legal challenge, RNAV procedures were withdrawn from Route 4, and Route 4 departures returned to the conventional procedures they followed prior to 2012.

1.1.11 Since then, London Gatwick has undertaken extensive work to progress an ACP to reintroduce RNAV procedures on Route 4 and overcome issues identified in the legal challenge.

Figure 1 – History of the Route 4 airspace change proposal



1.1.12 This ACP is essential because the ground-based infrastructure which supports conventional navigation is being phased out. All of London Gatwick's departure and arrival routes from its Main Runway have already adopted satellite-based navigation procedures, leaving Route 4 as the only one at risk.

1.1.13 In addition to the navigational standard upgrade, this ACP also aims to bring about additional benefits which align with the Design Principles developed and agreed with community representatives and industry bodies at earlier stages of the airspace change process for this ACP. These include:

- improvements to aircraft and passenger safety (in accordance with Design Principle 1);
- delivering targeted noise reduction for communities by avoiding built up areas and providing opportunities for wider track dispersal and relief;
- limiting and seeking to reduce, where possible, the environmental impact on local communities; and
- providing better long-term predictability of flight paths and greater compliance with the noise preferential route (NPR).

What are Design Principles?
Design Principles encompass the objectives that are being sought as part of an airspace change proposal. They help airspace designers to create and compare different route options. Design Principles include policy, safety, environmental and operational factors. The Design Principles must also consider the local context for the airspace change to take account of priorities within the affected area. Design Principles are developed during Stage 1 of the airspace change process, in collaboration with representatives from local communities and other key stakeholders.

1.1.14 London Gatwick has been developing this ACP in accordance with the process set out in version five of Civil Aviation Publication *CAP1616: The Process for Changing the Notified Airspace Design* (known as 'CAP1616'), which was originally published in December 2017, with the latest version coming into effect on 2 January 2024[2]. This document and the overall airspace change process is published and overseen by the CAA. More information on how the airspace change process works and London Gatwick's activity to date can be found in Section 2 of this document.

1.1.15 During Stages 1 and 2 of the airspace change process, London Gatwick engaged community representatives and industry bodies to agree and test the Design Principles underpinning the options for the future operation of Route 4. Based on those Design Principles, London Gatwick developed a shortlist of options for the future of Route 4. You can read about the Design Principles and the work carried out as part of Stages 1 and 2 in Section 2 of this document.

1.1.16 London Gatwick is now at Stage 3. It is required to undertake a formal public consultation to gather feedback from communities and stakeholders on its

[2] CAP1616: The Process for Changing the Notified Airspace Design (https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=12387).

shortlisted route options, before submitting a preferred option to the CAA for formal approval.

1.2 How to use this document

1.2.1 London Gatwick recognises airspace change is a complex topic. To address this, it has produced a suite of consultation materials with differing levels of detail to make it easier for the public and stakeholders to understand and engage with the proposals and provide informed views.

1.2.2 This is the Main Consultation Document. It provides detail on this ACP and the shortlisted options presented in this consultation. This document is broken down into the following main sections:

- **Section 1: Introduction**
  - Introduces the purpose and objectives of this ACP.
- **Section 2: Understanding airspace change**
  - Outlines the CAP1616 airspace change process and the requirements of each stage. This section also summarises where the Route 4 ACP currently is within the airspace change process, and the engagement London Gatwick has undertaken so far.
- **Section 3: Understanding the baseline for this airspace change proposal**
  - Explains the scenario against which the four options presented as part of this consultation have been assessed.
- **Section 4: The Route 4 options London Gatwick is seeking feedback on**
  - Describes the different options for Route 4 that London Gatwick is consulting on in this consultation.
- **Section 5: Assessing the options**
  - Explains the processes followed in undertaking an assessment of the options, alongside a summary of the impacts (positive and negative) of each option.
- **Section 6: The results**
  - Summarises the results of the options appraisal.
- **Section 7: Conclusion**
- **Section 8: How to participate in this consultation**
  - Explains how to take part in this consultation and provide your feedback, plus information on what will happen once this consultation closes.
- **Section 9: Next steps**
  - Explains the next steps in the ACP process, and describes how this consultation will impact the plans moving forward.

- **Section 10: Abbreviations**
- **Section 11: Glossary of terms**
- **Section 12: Appendices**

1.2.3 This document aims to explain the proposed changes in a way that those not familiar with aviation terminology can understand. To assist with this, London Gatwick has included a list of abbreviations and a glossary of terms at the end of this document. London Gatwick recommends using this list while reading the Main Consultation Document to help you understand some of the technical terminology used throughout this and other consultation materials.

1.3 Other consultation materials available

1.3.1 As part of this consultation, London Gatwick has published a Full Options Appraisal (FOA) providing a detailed, qualitative and quantitative assessment of each route option being taken forward. Other documents available as part of this consultation include:

Table 1 – Overview of the consultation materials

Document	Summary of Content
Consultation Newsletter	The Consultation Newsletter introduces this ACP to the public and stakeholders and provides information on how to engage with the consultation, how to access the consultation materials and how and when to respond.
Consultation Summary Document	The Consultation Summary Document provides a short summary of this ACP.
Main Consultation Document (this document)	The Main Consultation Document (this document) provides more detail on this ACP and explains how London Gatwick has reached the final options now being consulted on.
Full Options Appraisal (FOA)	The Full Options Appraisal (FOA) is a highly detailed document which provides significant technical evidence and analysis on all the options considered as part of this ACP.

1.3.2 Further information on how you can access the consultation materials and respond to this consultation is provided in Section 8, together with information on how you can contact London Gatwick with any questions about this ACP.

2 Understanding airspace change

2.1 What is airspace?

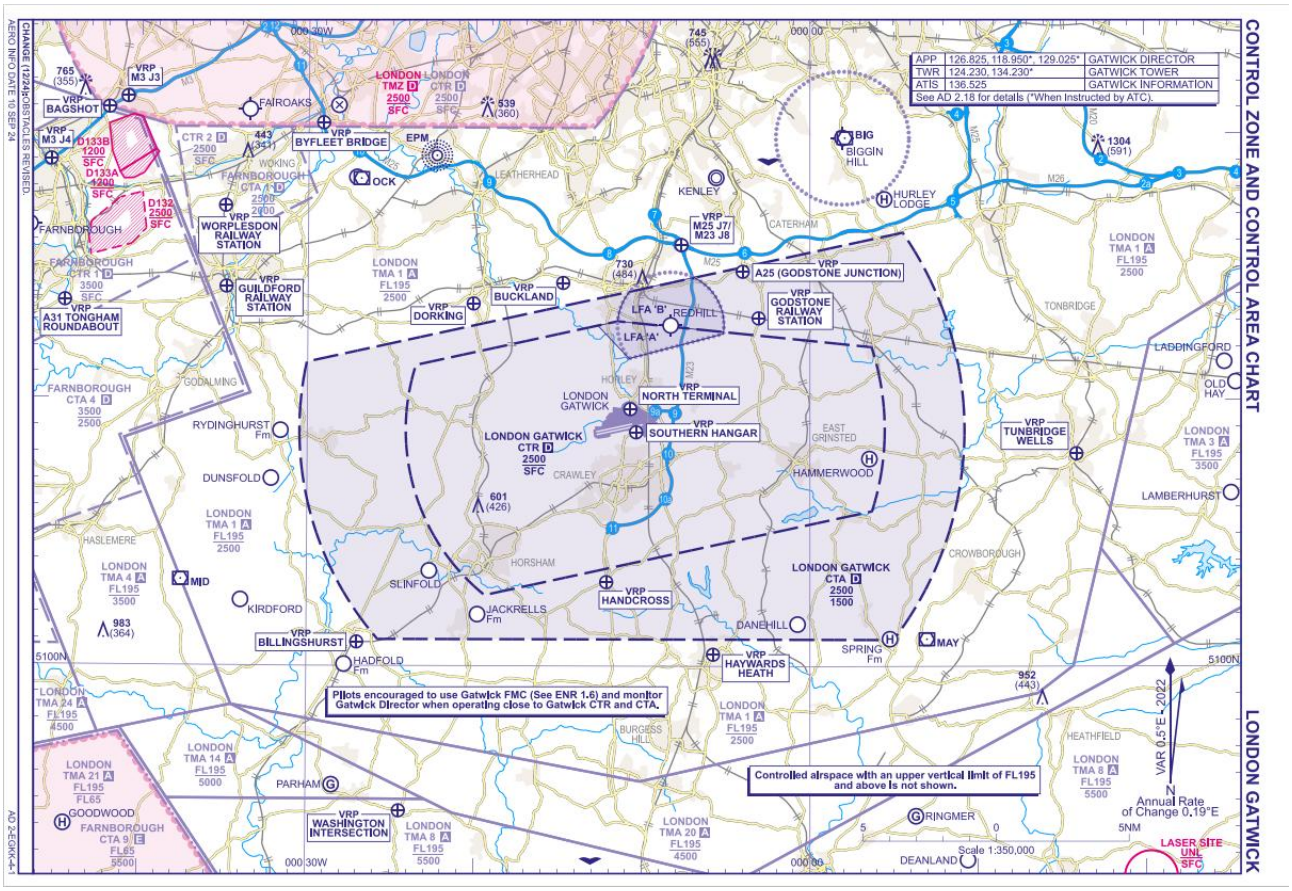
2.1.1 Airspace is the invisible infrastructure in the sky which helps aircraft navigate safely. This includes the flight paths that aircraft use when taking-off, flying and landing, as well as the holding patterns occasionally used by aircraft before landing.

2.1.2 Airports generally have areas of Controlled Airspace around the airport to create a safe environment for aircraft operations. This airspace usually consists of a Control Zone (CTR), established from surface level to a specified upper level, around the airport, and Control Areas (CTA), which usually sit on top of and around the CTR, and generally extend further from the airport. The CTAs provide protection to aircraft climbing out from the airport by joining the low-level control zone to the nearest airways or other blocks of Controlled Airspace.

2.1.3 In the case of London Gatwick, the CTR extends from the surface to 2,500 ft and the CTA extends from 2,500 ft upwards. When aircraft exit the CTA, they enter Controlled Airspace known as the London Terminal Manoeuvring Area (LTMA) which is established to control the high density of traffic that operates to and from the major London airports, including London Gatwick. London Gatwick has no control over the LTMA.

2.1.4 Within these controlled elements of airspace, most airports operate a series of pre-defined departure and arrival routes, known as Standard Instrument Departure (SID) routes and Standard Arrival Routes (STARs), that departing and arriving aircraft will follow in the immediate vicinity of the airport.

Figure 2 – Image showing the different types of controlled airspace in the vicinity of London Gatwick

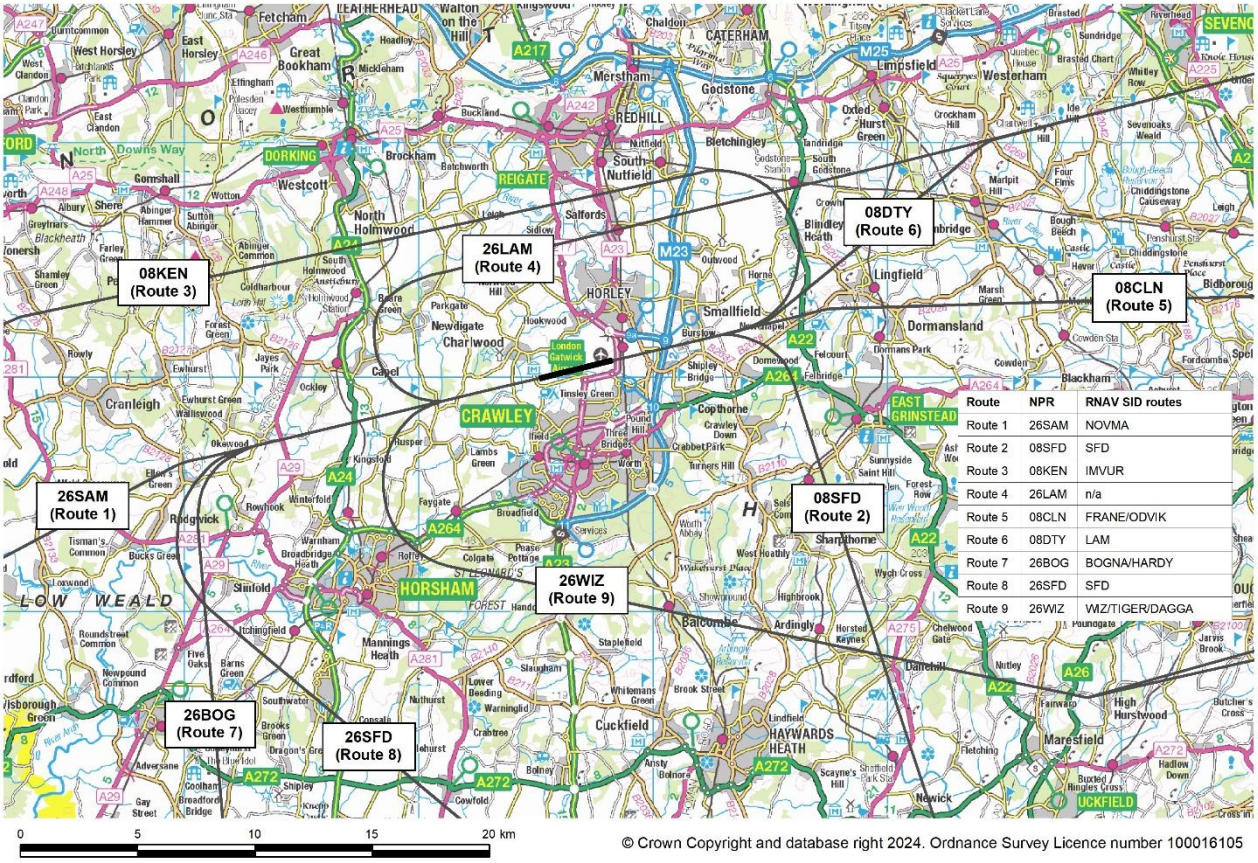


2.2 What is Route 4?

2.2.1 London Gatwick utilises a single runway for its operations, predominantly the Main Runway, also known as Runway 26L or 08R, depending on which direction aircraft are taking off and landing in. London Gatwick also operates its Northern Runway (26R/08L), but only when the main runway is unavailable.

2.2.2 Aircraft departing London Gatwick are required to follow flight paths aligned to Noise Preferential Routes (NPRs) unless directed otherwise by Air Traffic Control (ATC). NPRs are set by the Government and were designed to minimise noise disturbance to local communities. London Gatwick's SID routes are designed to comply with the published NPR routes until they climb above a specific altitude. The London Gatwick SID routes that typically terminate at 4,000 ft (some terminate at 3,000 ft), with their associated NPRs, are illustrated below.

Figure 3 – Map showing all nine of London Gatwick's SID routes from its Main Runway (and their associated NPRs)



Route	NPR	RNAV SID routes
Route 1	26SAM	NOVMA
Route 2	08SFD	SFD
Route 3	08KEN	IMVUR
Route 4	26LAM	n/a
Route 5	08CLN	FRANE/ODVIK
Route 6	08DTY	LAM
Route 7	26BOG	BOGNA/HARDY
Route 8	26SFD	SFD
Route 9	26WIZ	WIZ/TIGER/DAGGA

2.2.3 Route 4 is one of nine SID routes for aircraft taking off from London Gatwick. It applies to aircraft taking off to the west from Runway 26L but ultimately heading east on their journey. Soon after take-off, aircraft flying Route 4 turn 180 degrees northwards and head east, flying in the vicinity of South Holmwood, Leigh, Redhill and Reigate before flying on towards their destination.

2.2.4 Current Route 4 comprises three conventional SID routeings: LAM 6M6V, FRANE 1M1V and MIMFO 1M1V servicing destinations to the north, northeast and south/east of the airport respectively, from either runway in the westerly runway direction.

2.2.5 Historical, current and future operations described in this proposal follow the same initial procedure for all Route 4 SIDs up to a waypoint - ACORN for conventional procedures and SUNAV for RNAV procedures, after which the SIDs diverge.

2.2.6 For simplicity and to avoid unnecessary duplication throughout the documentation, LAM SID designator is used where needed and represents all Route 4 SIDs (LAM, FRANE and MIMFO).

2.2.7 On average, Route 4 accounts for around 27% of aircraft departures from London Gatwick. As a departure route, Route 4 does not account for any aircraft arriving at London Gatwick.

2.3 Why changes to Route 4 are needed

2.3.1 As described in Section 1, the introduction of satellite-based navigational procedures for Route 4 reflects a wider, government-led drive to modernise aircraft navigation performance and phase out conventional forms of navigation which date back to the 1950s. As part of this wider drive, the ground-based infrastructure which supports conventional navigation is in the process of being phased out.

2.3.2 For London Gatwick, this has meant introducing satellite-based navigation procedures on all of the arrival and departure routes from its Main Runway so that aircraft can use the new technology to replicate the existing (or conventional navigation) route positions.

2.3.3 With the exception of Route 4, all of the departure and arrival routes from the Main Runway at London Gatwick have already successfully adopted satellite-based navigation procedures.

2.3.4 Failure to adopt satellite-based navigation procedures on Route 4 would, barring Government or CAA intervention, result in aircraft being unable to utilise this departure route once the ground beacons supporting the Route 4 conventional procedure are decommissioned. This would be an unacceptable outcome if the integrity of the London Gatwick operation is to be maintained.

2.3.5 A detailed history of Route 4, including the challenges associated with adopting the new navigation procedures on Route 4, and further explanation of why changes to Route 4 are needed is provided in Section 1 of this document.

2.4 What is not within the scope of this consultation

2.4.1 This ACP is distinct from and not related to the Northern Runway Project Development Consent Order (DCO) application being brought forward by London Gatwick, which seeks permission to reposition the existing Northern Runway, along with lifting the current restrictions on its use, to enable dual runway operations at the Airport. This ACP is only concerned with re-introducing RNAV

based departure procedures for Route 4 from the Main Runway, as explained in the previous section. The need for this ACP, and its proposed implementation, is not affected by, or dependent on, the Northern Runway Project. Further information on the Northern Runway DCO application can be found here.

2.4.2 Additionally, NPRs are out of scope for this ACP and do not form part of this consultation. Changes to the NPR are the responsibility of the Department for Transport (DfT). It is anticipated that DfT will set any changes to the Route 4 NPR upon successful implementation of this airspace change.

2.5 What is the process for making changes to airspace design?

2.5.1 The CAA – the UK's independent aviation regulator – has responsibility for deciding whether to approve changes to the design of airspace in the UK.

2.5.2 Proposals to change airspace design must follow a detailed process as set out in the CAA's *CAP1616: The Process for Changing the Notified Airspace Design*[3]. This public consultation has been developed and planned in line with the fifth edition of this document, which came into effect on 2 January 2024.

2.5.3 This ACP has also been developed in line with the CAA's guidance documents, namely *CAP1616f: Guidance on Airspace Change Process for Permanent Airspace Change Proposals*[4], and other guidance and legislation as outlined in CAP1616.

2.5.4 Effective engagement and consultation with stakeholders and communities is a vital part of the airspace change process. CAP1616 requires change sponsors to engage stakeholders and the wider public at key stages of the process to explain the proposed changes and gather feedback.

What is a change sponsor?
Changes to the design of UK airspace are proposed by a change sponsor, usually an airport or a provider of air navigation services (including air traffic control).

London Gatwick is responsible for the flight procedures for airspace in the vicinity of Gatwick Airport, which is why London Gatwick is bringing forward this ACP.

2.5.5 Further detail about how London Gatwick has planned for and will deliver this public consultation, including information on how to take part, is set out in Section 8 of this document.

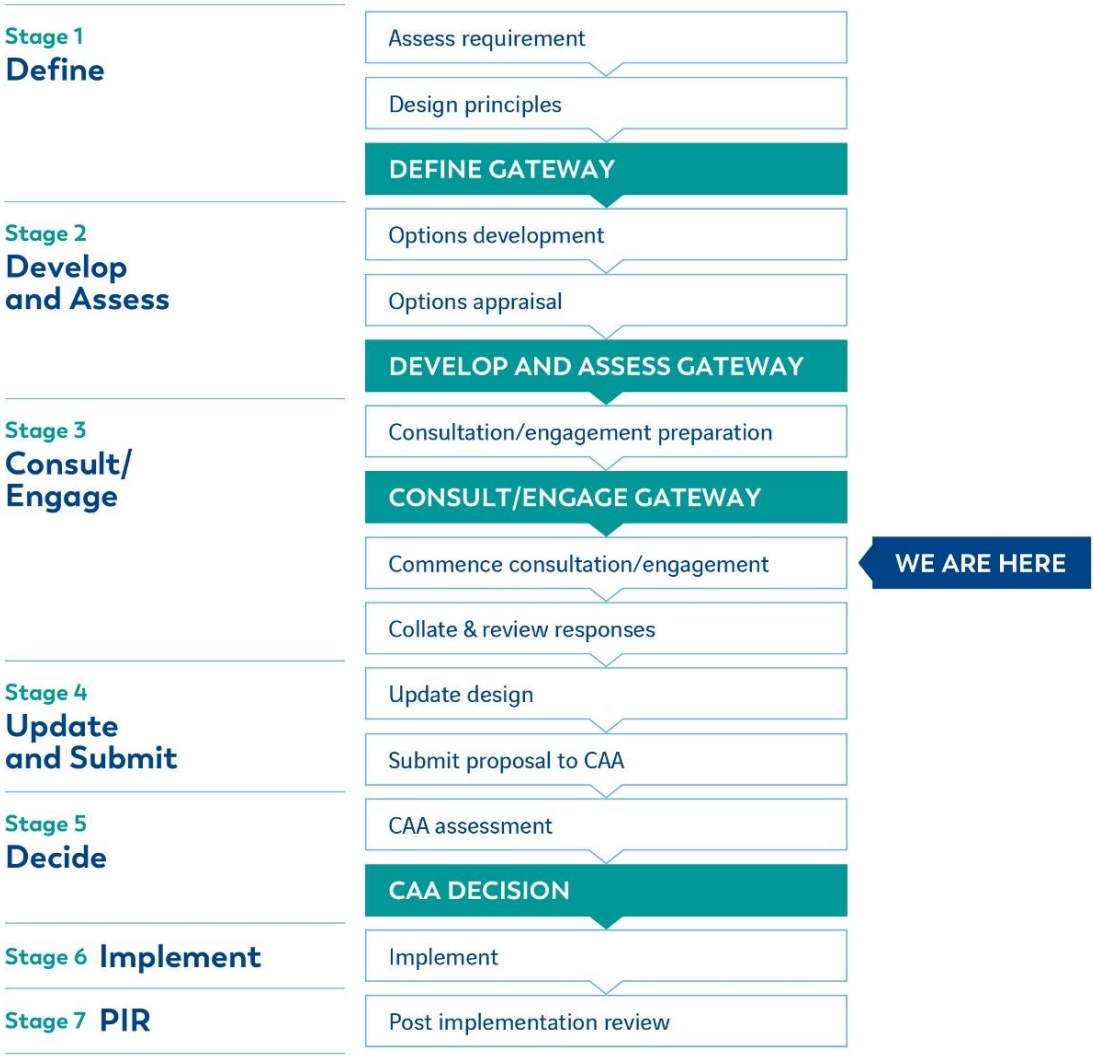
[3] CAP1616: The Process for Changing the Notified Airspace Design (https://www.caa.co.uk/publication/download/20735)
[4] CAP1616f: Guidance on Airspace Change Process for Permanent Airspace change proposals (https://www.caa.co.uk/publication/download/20863)

2.5.6 The CAA evaluates the progress of every ACP through a series of stages and gateway assessments. At each gateway assessment, the ACP sponsor must satisfy the CAA that it has followed the process correctly and met all the requirements before it can move to the next stage. At the end of the process, the CAA will make a decision on whether the proposed changes can be implemented.

2.5.7 Having successfully met the requirements of three assessment gateways, London Gatwick has now commenced Stage 3 - Consult/Engage.

2.5.8 The diagram below provides an overview of the airspace change process:

Figure 4 – Overview of the airspace change process



2.6 Summary of London Gatwick's work to date

Stage 1 - Define

2.6.1 At Stage 1, the change sponsor outlines its formal explanation as to why it needs to change the airspace by producing a Statement of Need. It then works with representative stakeholders to develop a set of Design Principles against which the route options will be developed and assessed in the subsequent stages.

2.6.2 In December 2018, London Gatwick submitted a Statement of Need (SoN) and the CAA indicated that an airspace change was appropriate to achieve the objectives set out within this document. A copy of the Statement of Need and

other associated documentation can be viewed on the CAA Airspace Change Portal here.[5]

2.6.3 In March 2019, London Gatwick invited relevant stakeholders – including community representatives, airline representatives, aviation stakeholders, councils, public officials, environmental groups and campaign groups – to participate in the development of Design Principles. The full list of the organisations invited to participate are recorded in Appendix 1 of the Design Principles Report which is available on the CAA airspace change portal.

2.6.4 In April 2019, London Gatwick distributed a questionnaire seeking these stakeholders' views on topics related to this ACP. Stakeholders were then invited to attend one of three focus group in May 2019 to share their views on the ACP and the emerging Design Principles.

2.6.5 Following this, London Gatwick developed a longlist of Design Principles, to provide high-level criteria that the proposed route options should meet. London Gatwick refined the longlist of Design Principles into a shortlist by listening to the priorities and concerns expressed by stakeholders. Stakeholders were then invited to comment on the shortlist over a six-week period between June and July 2019.

2.6.6 The final shortlist of Design Principles is shown in the table below. Design Principle 1 (DP1) is the main priority for London Gatwick and the CAA. As part of the safety requirement, London Gatwick will consider neighbouring airspace procedures to minimise potential conflicts as part of the design process. The numbering of the other Design Principles should not be taken to imply any relative priority.

Table 2 – Design Principles for this ACP

	Design Principle
1	Route 4 options will be designed safely with full regulatory compliance
2	Designs should be built to facilitate dispersion below 7,000 ft
3	New Route 4 designs options should give due regard to the historic routings in use prior to the introduction of RNAV routes in 2012
4	Route 4 designs should seek to minimise the adverse impact of noise on previously unaffected populations and seek to reduce the total number of people overflown
5	Designs should seek to minimise the impact of noise on particularly sensitive areas
6	Route 4 designs should enable transition to a vertical profile that allows an efficient, and potentially faster, climb to higher altitudes

[5] CAA Airspace Change Portal (https://airspacechange.caa.co.uk/PublicProposalArea?pID=111)

7	Designs that seek to provide respite should not overfly previously unaffected populations
8	Route 4 designs should not be constrained by the existing NPR to 4,000 ft

Stage 2 - Develop & Assess

2.6.7 At Stage 2, the change sponsor develops a comprehensive list of options that address the Statement of Need and align with the Design Principles from Stage 1. The change sponsor then carries out an initial appraisal of each option. At Stage 2, the change sponsor is required to re-engage with representative stakeholders to gather feedback on how the route options perform against the Design Principles. A key outcome of Stage 2 is to discount the least suitable options from further development.

2.6.8 In July 2022, initial design concepts (or route options) were created, and each option was evaluated against the Design Principles from Stage 1 as part of a Design Principles evaluation to understand the benefits and impacts of each option. Eight route options were presented to the same set of stakeholders engaged during Stage 1, alongside Option A, which follows the path over ground of the nominal track of the existing conventional procedure as closely as possible, as the 'do minimum' option. Option A became a stand-alone option (rather than the defined baseline) following clarification from the CAA that the temporary RNAV procedure (2016) could not be used as a baseline for comparative purposes. There is more information on the 'do minimum' scenario in Section 3 of this document. The outcomes of this engagement activity are detailed in the Design Engagement Document.[6]

2.6.9 In October 2022, London Gatwick completed an Initial Options Appraisal[7] (IOA) of each of the viable route options identified. Each option was considered against the 'do minimum' scenario to understand the potential impacts. The IOA contains qualitative assessments of the different route options to highlight to stakeholders and the CAA the relative differences between the impacts, both positive and negative, of each option.

2.6.10 At the end of Stage 2, London Gatwick's shortlist included four designs to be considered during the Stage 3 formal consultation.

2.6.11 A detailed explanation of how the constraints, Design Principles, and learning from the first Gateway were applied to the route options development can be

[6] Design Engagement Document (https://airspacechange.caa.co.uk/documents/download/4696)
[7] Initial Options Appraisal Submission 2 Issue 2 (https://airspacechange.caa.co.uk/documents/download/5028)

found in the Design Principles Evaluation[8] which is available to read on the CAA Airspace Change Portal.

2.6.12 All previous material relating to Stages 1 and 2 has been published on the CAA's airspace change portal.

Stage 3 - Consult/Engage **(where London Gatwick is now)**

2.6.13 London Gatwick is now in Stage 3, where it has carried out a Full Options Appraisal (FOA) of the shortlisted route options which builds on the IOA by undertaking, where possible, a quantitative appraisal of each option shortlisted from Stage 2.

2.6.14 As part of Stage 3, London Gatwick has prepared for and launched a public consultation to gather feedback from communities and stakeholders on the route options presented, with one marked as its 'preferred option'. This feedback will help London Gatwick make informed decisions about the proposals ahead of its submission at the end of Stage 4.

2.6.15 The four shortlisted route options are outlined in the table below. More detailed information on these options is available in Section 4.3 of this document. The options are presented as part of this consultation and have been renamed (when compared to earlier stages of the process) as set out below. There have been no changes to the design of these options when compared to Stage 2.

- Option A– referred to in Stage 2 as 'Option 0'.
- Option B – referred to in Stage 2 as 'Option 2'.
- Option C – referred to in Stage 2 as 'Option 4'.
- Option D – referred to in Stage 2 as 'Option 8'.

Table 3 – Summary of shortlisted route options

Option	Description
Option A – the 'do minimum' option	Option A aims to closely replicate the existing conventional procedure. Aircraft depart straight ahead, then turn at waypoint KKW02, following a path designed to match the conventional route as closely as possible. After the initial turn, aircraft proceed through waypoints KKE09 and KKE11, before routing via ACORN to their destination. This is the only option that retains the ACORN waypoint.
Option B	Option B is based on the previous satellite-based navigation procedure introduced in 2016 but keeping the straight portion after the turn as per the existing conventional procedure, unlike Option D (below). Aircraft follow

[8] Design Principles Evaluation Submission 2 Issue 2 (https://airspacechange.caa.co.uk/documents/download/5027)

	the same initial departure and turn at waypoint KKW02, then proceed through NEW09 and NEW11 waypoints towards SUNAV.
Option C	Option C introduces as much dispersion in the turn as possible in line with feedback received during Stage 2 of the ACP process. It features three sequential turn points, spaced 400m apart and rotated periodically to vary departure paths. After the chosen turn, aircraft converge at waypoint NEW09 and continue through NEW11 to SUNAV. This option increases variability in flight paths, but this variation will need to take place at pre-agreed periods for safety and operational reasons.
Option D	Option D replicates the satellite-based navigation procedure as published in 2016, including a tighter initial turn at waypoint KKW02 resulting in more pronounced track overshoot. After the turn, aircraft pass through waypoints WPT09 and WPT11, then adjust left at KKE15 before heading to SUNAV. The route tracks further south than other options.

What happens next

2.6.16 Once the Stage 3 consultation has closed, London Gatwick will carefully consider all of the consultation responses and further refine its proposals in response to the feedback received from communities and stakeholders.

2.6.17 During Stage 4, London Gatwick will update the designs, confirm a preferred option and consider if it needs to make any final changes to it based on the feedback it has received. London Gatwick will then complete the Final Options Appraisal and assess the need for additional consultation ahead of submitting the final ACP to the CAA. London Gatwick will also submit a report, completed at the end of Stage 3, which explains how it has given due regard to consultation feedback.

2.6.18 At Stage 5, the CAA will review the final ACP and may request further information or clarification from London Gatwick before making a decision. The CAA can also call a public evidence session on the ACP if there is sufficient public interest shown in the proceeding stages by stakeholders. The CAA will decide whether to approve the final ACP, if it is not first called in by the Secretary of State for Transport. Any final decision may be subject to modifications or conditions.

2.6.19 At Stage 6, if the ACP is approved, the proposal is implemented.

2.6.20 At Stage 7, a Post Implementation Review is undertaken by the CAA (usually around 12 months after implementation) to determine if the ACP has produced the intended outcomes.

3 Understanding the baseline for this airspace change proposal

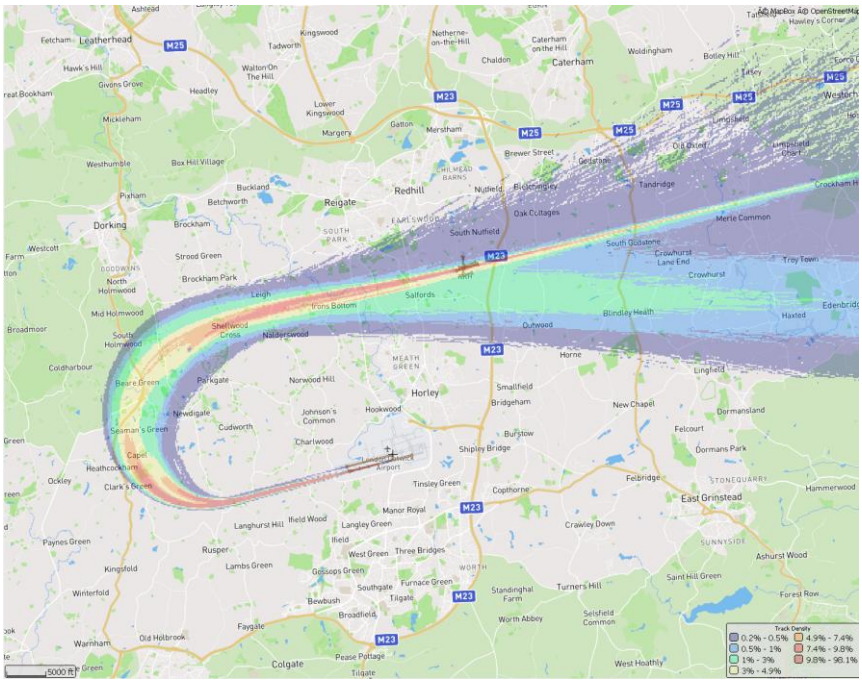
3.1.1 When proposing changes to airspace design, change sponsors must establish a 'baseline' so that a comparison can be made against the options being proposed, both at the time of implementation of the airspace change, and 10 years following implementation.

3.1.2 In most instances, the current operation will act as the baseline for comparative purposes. However, as explained in Section 1, maintaining the current operation of Route 4 is not a viable long-term option as the ground-based beacons it relies upon will soon be removed from service.

3.1.3 Therefore, for this ACP, it is necessary for London Gatwick to define a 'do minimum' option which serves as the baseline for the purposes of comparing the options for Route 4.

3.1.4 Defining a 'do minimum' baseline involves the change sponsor setting out an informed view of the minimum changes required to address the needs identified in its original Statement of Need. You can read the Statement of Need for this ACP here.[9]

Diagram 1 – Track Density Diagram showing Current Operations on Route 4, Summer 2024



[9] Statement of Need v1 (https://airspacechange.caa.co.uk/documents/download/393)

3.1.5 In the case of this ACP, the baseline is the RNAV substitution of the current conventional route, using the RNAV overlay procedures.

What are RNAV overlay procedures?

An RNAV overlay procedure is a flight procedure that uses Area Navigation (RNAV) to perform a conventional procedure. In practice, this results in aircraft flying the same tracks and altitudes as the conventional routes, but with navigation guidance coming via satellite-based, rather than ground-based, navigation procedures.

3.1.6 The current conventional procedure is published in the Aeronautical Information Publication (AIP), as follows:

3.1.7 Departing aircraft continue straight ahead on runway heading for approximately 2 NM. By this point, aircraft must climb to or above 1,500 ft Above Mean Sea Level (AMSL), and fly at speed no higher than 220 Knots Indicated Airspeed (KIAS).

3.1.8 Then, aircraft turn right and aim to intercept radial 258 emitting from the Detling VOR beacon by D31 waypoint. By this point, aircraft must also achieve minimum altitude of 3,200 ft AMSL and maintain speed of no higher than 220 KIAS. Further restrictions on the route require that by D29 waypoint, altitude of no higher than 4,000 ft AMSL is maintained, with the speed increased to maximum of 250 KIAS. Aircraft then continue towards the ACORN waypoint, where different SID routes will split.

3.1.9 RNAV substitution means that aircraft will not physically fly the route as per the conventional procedure described here. Instead, each airline will develop and fly its own RNAV procedure, aiming to comply as closely as they can with the described conventional procedure.

3.1.10 Figures showing each Route 4 SID departure route as published in the current AIP:

Figure 5 – Image showing the LAM SID

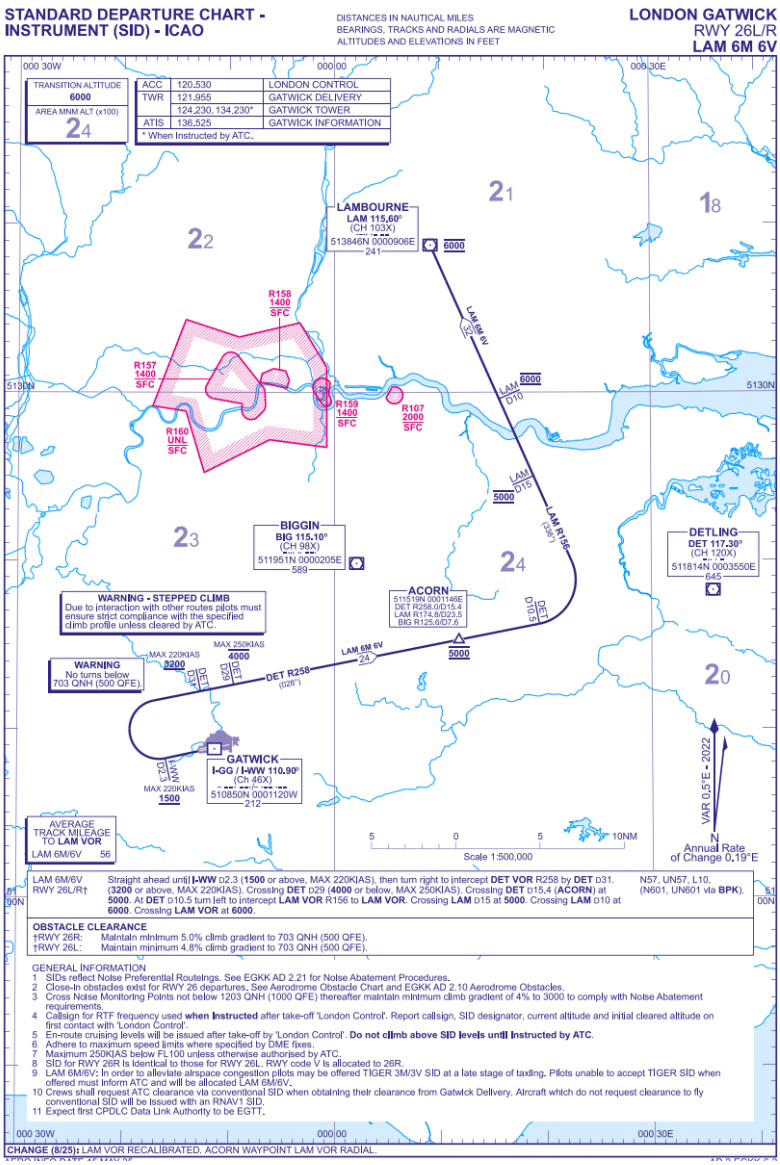


Figure 6 – Image showing the MIMFO SID

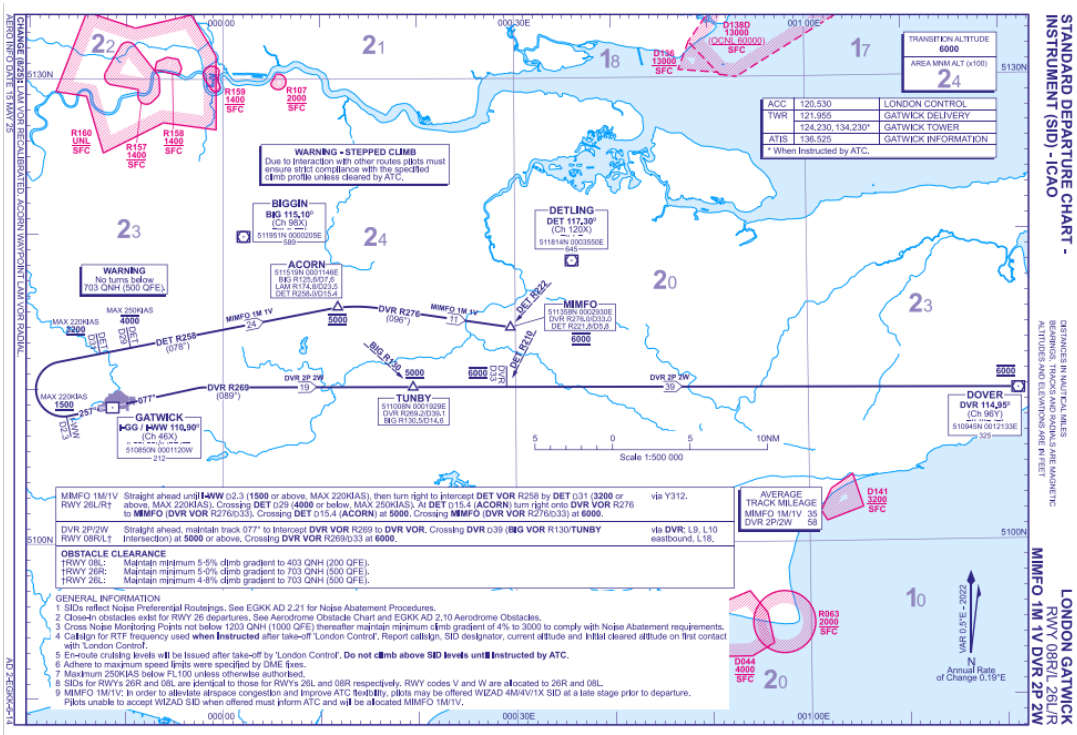
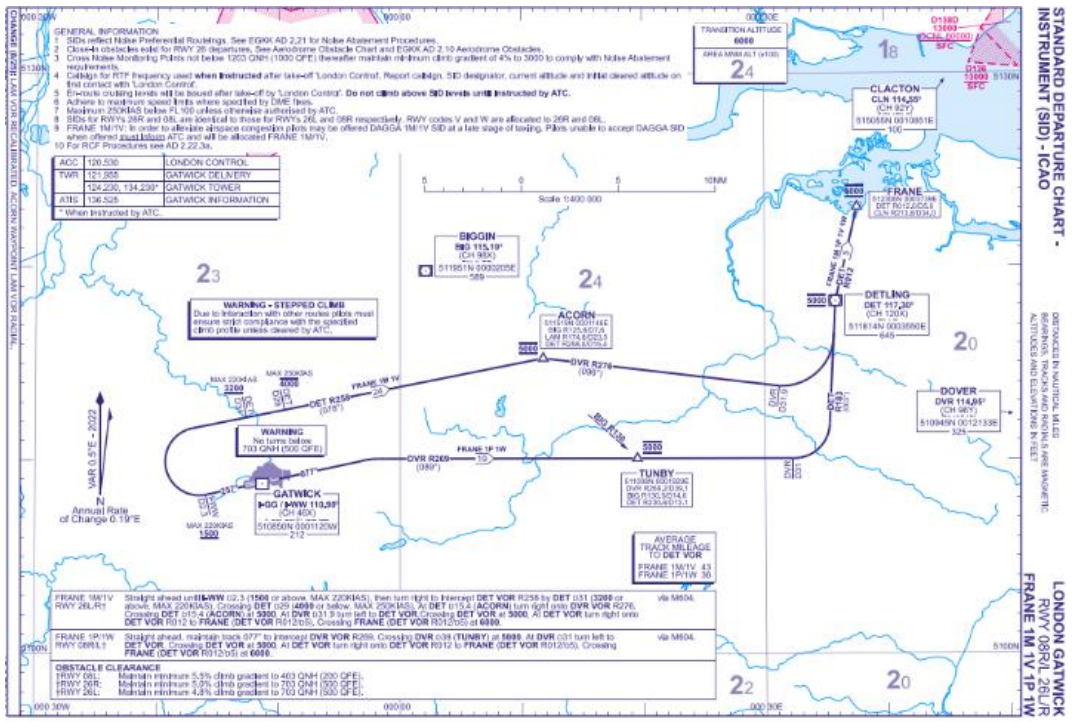


Figure 7 – Image showing the FRANE SID



3.1.11 This approach to defining the baseline for this ACP is normal practice and was agreed with the CAA during Stage 2 in January 2022. You can read the CAA's acceptance of the baseline methodology here.[10]

3.1.12 To read more about the baseline, please see Chapter 3 of the FOA.

[10] CAA's acceptance of GAL's methodology for defining CAP 1616 Baseline (https://airspacechange.caa.co.uk/documents/download/4036)

4 The Route 4 options London Gatwick is seeking feedback on

4.1.1 The following section provides information about the shortlisted route options London Gatwick is seeking feedback on in this public consultation.

4.1.2 These options have been developed with input from community representatives and industry stakeholders during Stages 1 and 2 of the airspace change process, as described in Section 2 of this document. The outcomes of the Stage 2 engagement activity are detailed in the Design Engagement Document.

4.1.3 All the options presented align with the agreed Design Principles, which are listed in Section 2 of this document. All the options have been subject to a detailed analysis against the baseline, as described in Section 3. Information on the assessment process and the outcomes of this are set out in Section 5 of this document.

4.2 Constraints on the options available for Route 4

4.2.1 As explained in Section 3, because the 'do nothing' option is not feasible for this ACP, the 'do minimum' option is acting as the baseline. In addition to this, there are a number of factors beyond London Gatwick's control that limit the options available for the future operation of Route 4. These include the following:

- The proximity of London Gatwick to other busy areas of airspace in and around London and the South East of England. This limits the options London Gatwick can safely consider and bring forward as part of this ACP. London Gatwick cannot change other existing routes – served by London Gatwick or other airports.
- Airspace in the vicinity of London Gatwick is utilised by several other London airports, with routes flying above Gatwick's Route 4. Consequently, to maintain safe separation from the routes above, Route 4 is limited in how quickly aircraft can climb, meaning that in practical terms they are forced to fly lower for longer increasing noise impacts on the ground.
- In line with the wishes of community representatives engaged during Stages 1 and 2 of the airspace change process, London Gatwick has – via the agreed Design Principles for this ACP outlined in Section 2 of this document – committed to only progressing designs which remain within the current NPR as far as possible, while dispersing traffic as much as possible.

4.3 An overview of the options for this airspace change proposal

4.3.1 The following section provides a description of each of the route options London Gatwick is seeking feedback on as part of this public consultation. The four options have been renamed (when compared to earlier stages of the process) as set out below:

- Option A – referred to in Stage 2 as 'Option 0'.
- Option B – referred to in Stage 2 as 'Option 2'.
- Option C – referred to in Stage 2 as 'Option 4'.
- Option D – referred to in Stage 2 as 'Option 8'.

4.3.2 The descriptions of the options contain a number of technical terms which are explained below to aid with understanding. These terms are also included in the list of abbreviations and a glossary of terms at the end of this document.

Table 4 – Glossary of key airspace terms

Term	Definition
Nautical Miles (NM)	A nautical mile is a unit of measurement for distance in air navigation. One nautical mile is equivalent to 1.1508 land-measured miles or 1.852 kilometres.
Above Mean Sea Level (AMSL)	Above Mean Sea Level is a measurement of the height of an object from the average level of the ocean's surface.
Knots Indicated Airspeed (KIAS)	Knots Indicated Airspeed refers to the measurement of an aircraft's speed through the air. It is expressed in knots (a unit of speed used in aviation, equivalent to one nautical mile per hour) and is indicated by instruments within the cockpit. This measurement specifically represents the speed of the aircraft relative to the air surrounding it, as measured by instruments onboard the aircraft. It is a crucial parameter for pilots to monitor during flight, as it helps ensure safe and efficient operation of the aircraft.

4.3.3 In addition, several tools are available on Citizen Space (www.route4acp.co.uk) to help with understanding the options and their relative benefits and impacts. This includes:

- A short video which illustrates how each option differs.
- An online postcode look-up tool which helps you explore the relative impact of each option in the context of where you live.

Option A

4.3.4 Option A follows the path over ground of the nominal track of the existing conventional procedure as closely as possible. Option A is not the same as the baseline described in the previous section. This is because the baseline assumes that the published procedure is a conventional one with different

airlines implementing their own RNAV based solutions to comply with the conventional route as closely as possible. In contrast, this option would replace the conventional published procedure altogether, with all operators needing to implement and comply with it. The main difference between the two is that this option would be permanent once implemented whereas the baseline is not as described in Section 4.1 of the Full Options Appraisal Document.

4.3.5 London Gatwick's intent with Option A is to replicate the existing conventional procedure and to follow its path over the ground as closely as possible. This option pays due regard to the historical tracks which were implemented from the 1950s and were flown until 2016, when the first RNAV procedure was implemented, and then re-instated in 2020 following the CAP1912 decision.

4.3.6 For the purpose of this consultation, Option A flies via a waypoint currently labelled as ACORN. The intention is for this waypoint to be an RNAV waypoint which will be collocated with the current conventional ACORN waypoint. At implementation, an appropriate name will be given to this waypoint.

What are waypoints?

A waypoint is a specified geographical location used to define an Area Navigation route or the flight path of an aircraft employing Area Navigation. Waypoints serve as reference points along an aircraft's flight route. They are identified as either Fly-by or Flyover. A Fly-by waypoint requires the aircraft to start turning early to smoothly follow the next segment of its route or flight. A Flyover waypoint is a point at which the aircraft starts to turn to connect with the next part of its route or flight path.

There are a number of waypoints of relevance to the Route 4 options. These are marked on the images associated with each option.

4.3.7 For the avoidance of doubt, London Gatwick deliberately did not use the SUNAV waypoint label, utilised in Options B, C and D, because the locations of ACORN and SUNAV (511536.90N 0001139.80E) are not the same. Given that Option A aims to replicate the existing conventional route, London Gatwick is making clear that the waypoint intended to be used will collocate with ACORN.

4.3.8 Departing aircraft continue straight ahead on runway heading for approximately 2 NM to the initial turning waypoint, designated KKW02. Aircraft must be at or above 1,500 ft Above Mean Sea Level (AMSL), and a maximum speed of 220 Knots Indicated Airspeed (KIAS). The position of the initial turn point (KKW02) and the associated height and speed restrictions are identical to the current conventional procedure; this is also the same initial turn point for all options being

considered. KKW02 is designated as a 'fly over' waypoint, which means the aircraft must overfly this point before commencing their turn.

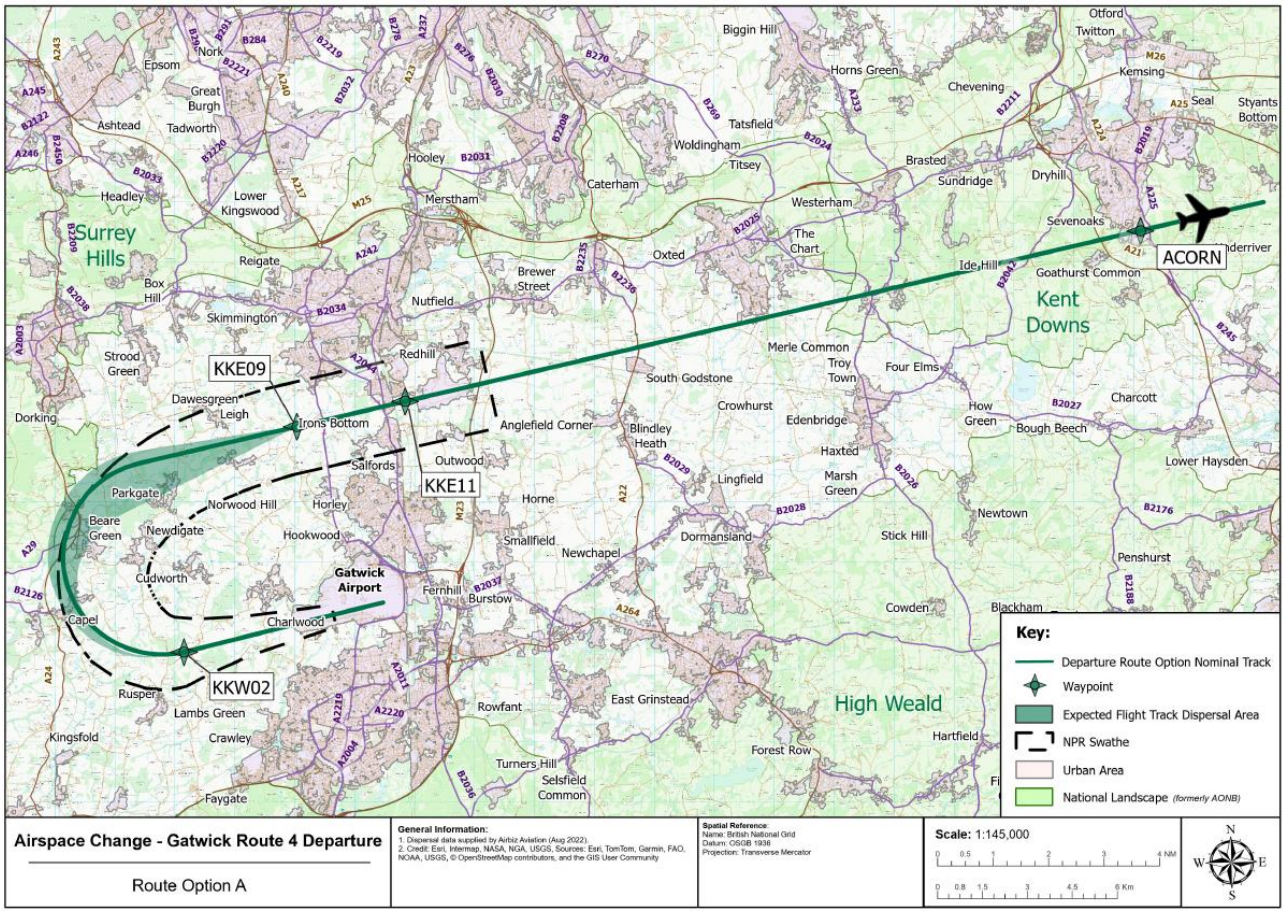
4.3.9 At KKW02, aircraft will commence a right-hand turn towards the next waypoint. The turn has been designed using a Course to Fix Path Terminator to ensure a degree of dispersion during the turn. An individual aircraft's Flight Management System (FMS) will determine how the aircraft will fly the turn to ensure it arrives at the next waypoint on the correct heading that the aircraft must maintain upon reaching the waypoint. The anticipated dispersion of aircraft during this turn can be seen in Figure 8 below, where the shaded area shows the region where aircraft can be expected to fly during the turn. Fast-time simulation modelling was conducted, using the same flight data previously used for environmental modelling, to depict the anticipated dispersion swathe as accurately as possible.

4.3.10 Following the right-hand turn, aircraft route through two intermediate waypoints (KKE09 and KKE11) directly towards the waypoint ACORN where the departure routes split, depending on the aircraft's required final destination. Following the initial turn, each individual aircraft's FMS will aim to get the aircraft onto the nominal track line as soon as possible after a waypoint. This will result in very little lateral track dispersion on the straight legs, as can be seen by the lack of an anticipated dispersion swathe after waypoint KKE09 in Figure 5 below.

4.3.11 The two additional waypoints, KKE09 and KKE11, also impose restrictions on the flight profile due to airspace restrictions and interactions with other adjacent routes. These airspace restrictions require that waypoint KKE09 is flown at or above 3,200 ft AMSL and waypoint KKE11 at or below 4,000 ft AMSL, where the speed restriction of 220 KIAS is raised to 250 KIAS. Both waypoints are designated as 'fly by' waypoints, which means that aircraft may not necessarily overfly the points as the aircraft's FMS could anticipate any turn and will ensure the aircraft turns prior to arriving at the waypoint. However, due to the nature of the route for this procedure and the lack of turns following the initial right-hand turn, it is likely that these waypoints will be overflown by departing aircraft.

4.3.12 Following these waypoints, aircraft route to ACORN where they are required to be at 5,000 ft AMSL. Option A is the only option under consideration that routes via ACORN in order to pay due regard to historical tracks and current conventional routing.

Figure 8 – Image of Option A



Option B

4.3.13 London Gatwick's intent with Option B is to copy the previous RNAV route introduced in 2016 but to keep the straight portion after the turn as per the conventional procedure, rather than the southerly track adjustment that has been included in Option D (described below). Option B has been designed to route directly to SUNAV. The RNAV route was published in 2016 and was subsequently withdrawn in 2019.

4.3.14 Departing aircraft continue straight ahead on runway heading for approximately 2 NM to the initial turning waypoint, designated KKW02. Aircraft must be at or above 1,500 ft Above Mean Sea Level (AMSL) at this point and must be at or below a maximum speed of 220 Knots Indicated Airspeed (KIAS). The position of the initial turn point (KKW02) and the height and speed restrictions are identical to all the other options. KKW02 is designated as a 'fly over' waypoint, which means the aircraft must overfly this point before commencing their turn.

4.3.15 At KKW02, aircraft will commence a right-hand turn towards the next waypoint, NEW11. The turn has been designed using a Course to Fix Path Terminator to

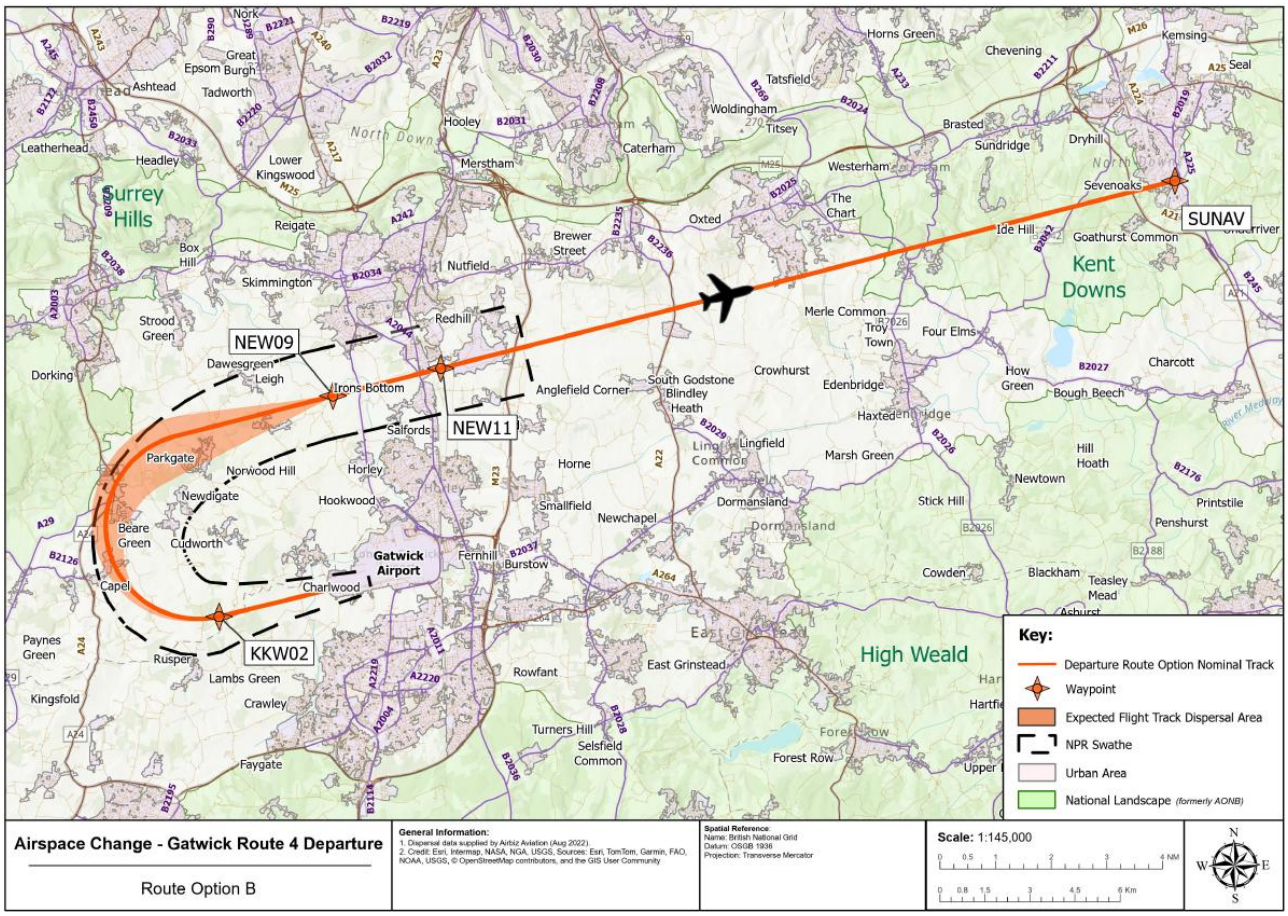
ensure a degree of dispersion during the turn. An individual aircraft's Flight Management System (FMS) will determine how the aircraft will fly the turn to ensure it arrives at the next waypoint on the correct heading that the aircraft must maintain upon reaching the waypoint. The anticipated dispersion of aircraft during this turn can be seen in Figure 9 below, where the shaded area shows the region where aircraft can be expected to fly during the turn. Fast-time simulation modelling was conducted, using the same flight data previously used for environmental modelling, to depict the anticipated dispersion swathe as accurately as possible.

4.3.16 Following the right-hand turn, aircraft route through two intermediate waypoints (NEW09 and NEW11) directly to waypoint SUNAV where the departure routes split, depending on the aircraft's required final destination. The two intermediate waypoints are at slightly different locations from those in Option A (KKE09 and KKE11) due to the different position of ACORN compared to SUNAV. Following the initial turn at KKW02, each subsequent leg of the procedure has been designed using a Track to Fix Path Terminator, which means that the aircraft's FMS will aim to get the aircraft onto the nominal track line as soon as possible after a waypoint. This will result in very little lateral track dispersion on the straight legs, as can be seen by the lack of an anticipated dispersion swathe after waypoint NEW09 in Figure 9 below.

4.3.17 The two additional waypoints, NEW09 and NEW11, have been added to also impose restrictions on the flight profile due to airspace restrictions and interactions with other adjacent routes. These airspace restrictions require that waypoint NEW09 is flown at or above 3,200 ft AMSL and waypoint NEW11 at or below 4,000 ft AMSL, where the speed restriction of 220 KIAS is raised to 250 KIAS. Both waypoints are designated as 'fly by' waypoints, which means that aircraft may not necessarily overfly the points as the aircraft's FMS could anticipate any turn and turn the aircraft prior to arriving at the waypoint. However, due to the nature of the route for this procedure and the lack of turns following the initial right-hand turn, it is likely that these waypoints will be overflown by departing aircraft.

4.3.18 Following these waypoints, aircraft route to SUNAV where they are required to be at 5,000 ft AMSL.

Figure 9 – Image of Option B



Option C

4.3.19 London Gatwick's intent with Option C is to introduce as much dispersion in the turn as possible in line with feedback received during Stage 2 of the ACP process. Option C has been designed with three initial turn point options (Early Turn, Mid Turn and Late Turn) placed sequentially 400m apart that will be utilised on a rotational basis to vary the initial turn segments for aircraft. This option will increase the degree of dispersion when compared to the other options. Each individual turn segment will be utilised during distinct periods; how these periods will vary is yet to be determined, but the use of each segment could be rotated on a daily, weekly or even monthly basis. However, it should be noted that each route track cannot be used for sequential aircraft departures because of the potential for reduced safety margins and increased Air Traffic Control workload. Following the initial right-hand turn, Option C brings the paths to a common waypoint, NEW09, before routing direct to SUNAV.

4.3.20 From departure, aircraft continue straight ahead on runway heading for approximately 2 NM to the initial turning waypoint for the specific turn segment in

operation for the aircraft's departure. The position of the Early Turn point, designated KKW02, is identical to Option B. The turn point for the Mid Turn track, designated KKW98, is positioned a further 400m along the initial take-off track from KKW02, and the turn for the Late Turn track, designated KKW99, a further 400m; hence 800m from KKW02. Aircraft must be at or above 1,500 ft Above Mean Sea Level (AMSL) and must be at or below a maximum speed of 220 Knots Indicated Air Speed (KIAS) at each initial turn point for the track in operation. Each of the initial waypoints are designated as a 'fly over' waypoint, which means the aircraft must overfly the relevant turn point before commencing their turn.

4.3.21 At the initial turn point (KKW02, KKW98, KKW99), aircraft will commence a right-hand turn towards the next waypoint. The turn has been designed using a Course to Fix Path Terminator to ensure a degree of dispersion during the turn. An individual aircraft's Flight Management System (FMS) will determine how the aircraft will fly the turn to ensure it arrives at the next waypoint on the correct heading that the aircraft must maintain upon reaching the waypoint. The Early Turn track for Option C is identical to Option B. Aircraft following the Mid Turn or Late Turn tracks will follow a different ground track, resulting in a different dispersion pattern during the turn.

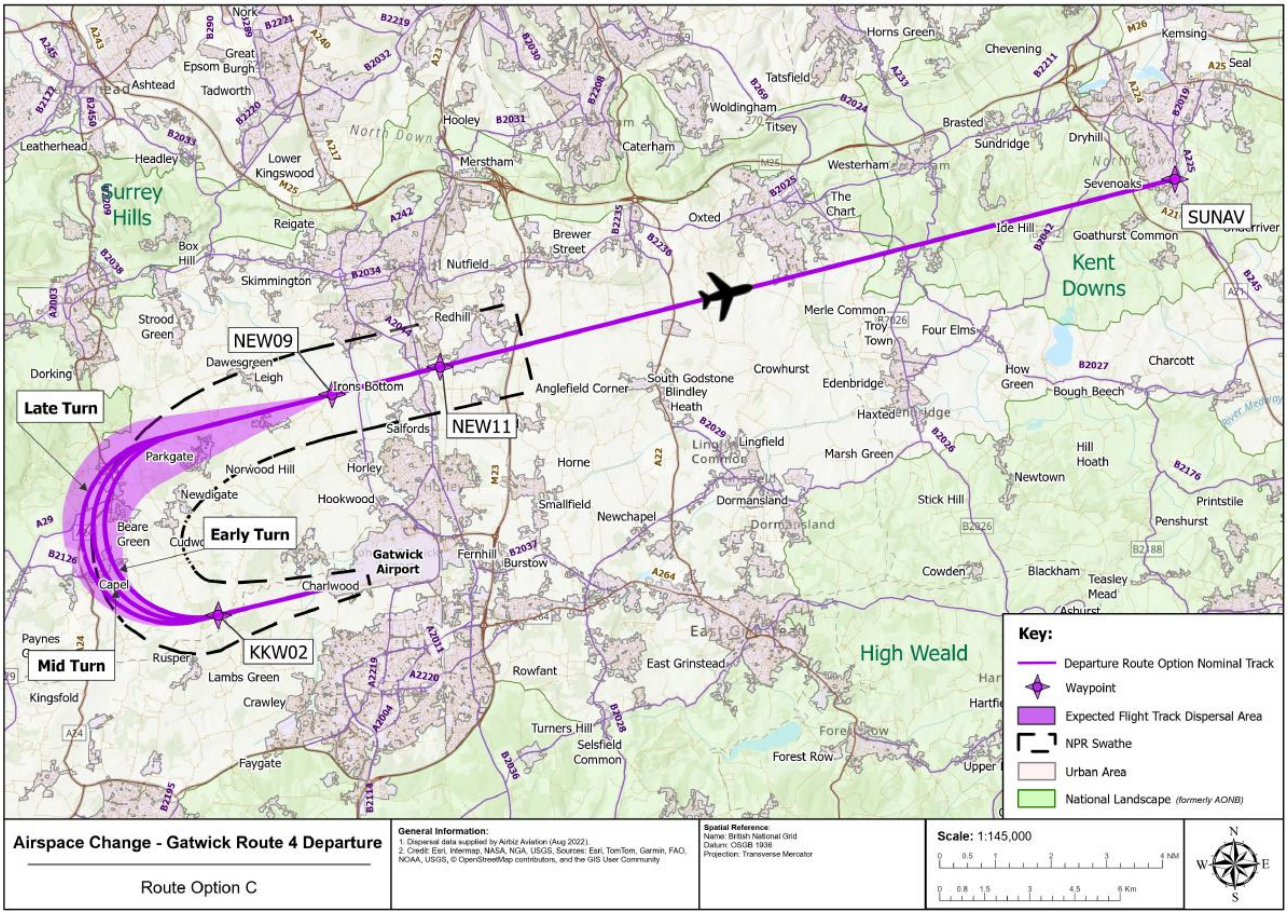
4.3.22 The total anticipated dispersion for all three sub-options can be seen in Figure 10 below, where the shaded area shows the region within which aircraft can be expected to fly during the turn. Fast-time simulation modelling was conducted, using the same flight data previously used for environmental modelling, to depict the anticipated dispersion swathe as accurately as possible.

4.3.23 Regardless of which initial turn segment is utilised, following the right-hand turn, aircraft route through the two intermediate waypoints (NEW09 and NEW11) directly towards the waypoint SUNAV where the departure routes split, depending on the aircraft's required final destination. The two intermediate waypoints are at slightly different locations from those in Option A (KKE09 and KKE11) due to the different position of ACORN compared to SUNAV. Following the initial turn, each subsequent leg of the procedure has been designed using a Track to Fix Path Terminator, which means that the aircraft's FMS will aim to get the aircraft onto the nominal track line as soon as possible after a waypoint. This will result in very little lateral track dispersion on the straight legs, as can be seen by the lack of an anticipated dispersion swathe after waypoint NEW09 in Figure 10 below.

4.3.24 The two additional waypoints, NEW09 and NEW11, also impose restrictions on the flight profile due to airspace restrictions and interactions with other adjacent routes. The positions of NEW09 and NEW11 are identical to Option B. These airspace restrictions require that waypoint NEW09 is flown at or above 3,200 ft AMSL and waypoint NEW11 at or below 4,000 ft AMSL, where the speed restriction of 220 KIAS is raised to 250 KIAS. Both waypoints are designated as 'fly by' waypoints, which means that aircraft may not necessarily overfly the points as the aircraft's FMS could anticipate any turn and turn the aircraft prior to arriving at the waypoint. However, due to the nature of the route for this procedure and the lack of turns following the initial right-hand turn, it is likely that these waypoints will be overflown by departing aircraft.

4.3.25 Following these waypoints, aircraft route to SUNAV where they are required to be at 5,000 ft AMSL.

Figure 10 – Image of Option C



Option D

4.3.26 London Gatwick's intent with Option D is to copy the RNAV route introduced in 2013, modified in 2016 and withdrawn in 2019.Option D had previously been

defined as the baseline scenario for this ACP but became a stand-alone, viable option following clarification from the CAA that the temporary RNAV procedure could not be used as a baseline for comparative purposes.

4.3.27 Departing aircraft continue straight ahead on runway heading for approximately 2 NM to the initial turning waypoint, designated KKW02. Aircraft must be at or above 1,500 ft Above Mean Sea Level (AMSL) at this point and must be at or below a maximum speed of 220 Knots Indicated Airspeed (KIAS). The position of the initial turn point (KKW02) and the height and speed restrictions are identical to all other options. KKW02 is designated as a 'fly over' waypoint, which means the aircraft must overfly this point before commencing their turn.

4.3.28 At KKW02, aircraft will commence a right-hand turn towards the next waypoint. The turn has been designed using a Course to Fix Path Terminator to ensure a degree of dispersion during the turn. An individual aircraft's Flight Management System (FMS) will determine how the aircraft will fly the turn to ensure it arrives at the next waypoint on the correct heading that the aircraft must maintain upon reaching the waypoint. The anticipated dispersion of aircraft during this turn can be seen in Figure 11 below, where the shaded area shows the region where aircraft can be expected to fly during the turn. Fast-time simulation modelling was conducted, using the same flight data previously used for environmental modelling, to depict the anticipated dispersion swathe as accurately as possible.

4.3.29 For Option D, the planned turn between waypoint KKW02 and WPT09 is the tightest turn of all the options. As a result, the fast-time simulation has shown that aircraft will 'overshoot' the track line shown on Figure 8 below and the dispersion will all be to the west of the indicated track line. This is a function of the fact that the aircraft FMS will determine the aircraft's track around the turn and the track line shown on the image is only an indication of where the aircraft could fly.

4.3.30 Following the right-hand turn, aircraft route through two intermediate waypoints (WPT09 and WPT11) to waypoint KKE15, where aircraft adjust track left by 3° before routing direct to the waypoint SUNAV, where the departure routes split depending on the aircraft's required final destination. Waypoint KKE15 is further south than the corresponding position for other options to attempt to minimise overflight impacts by flying a tighter right-hand turn, and track further south than the previous options, before adjusting track towards SUNAV. Following the initial turn, each subsequent leg of the procedure has been designed using a Track to Fix Path Terminator, which means the aircraft's FMS will aim to get the aircraft onto the nominal track line as soon as possible after a waypoint. This will result in

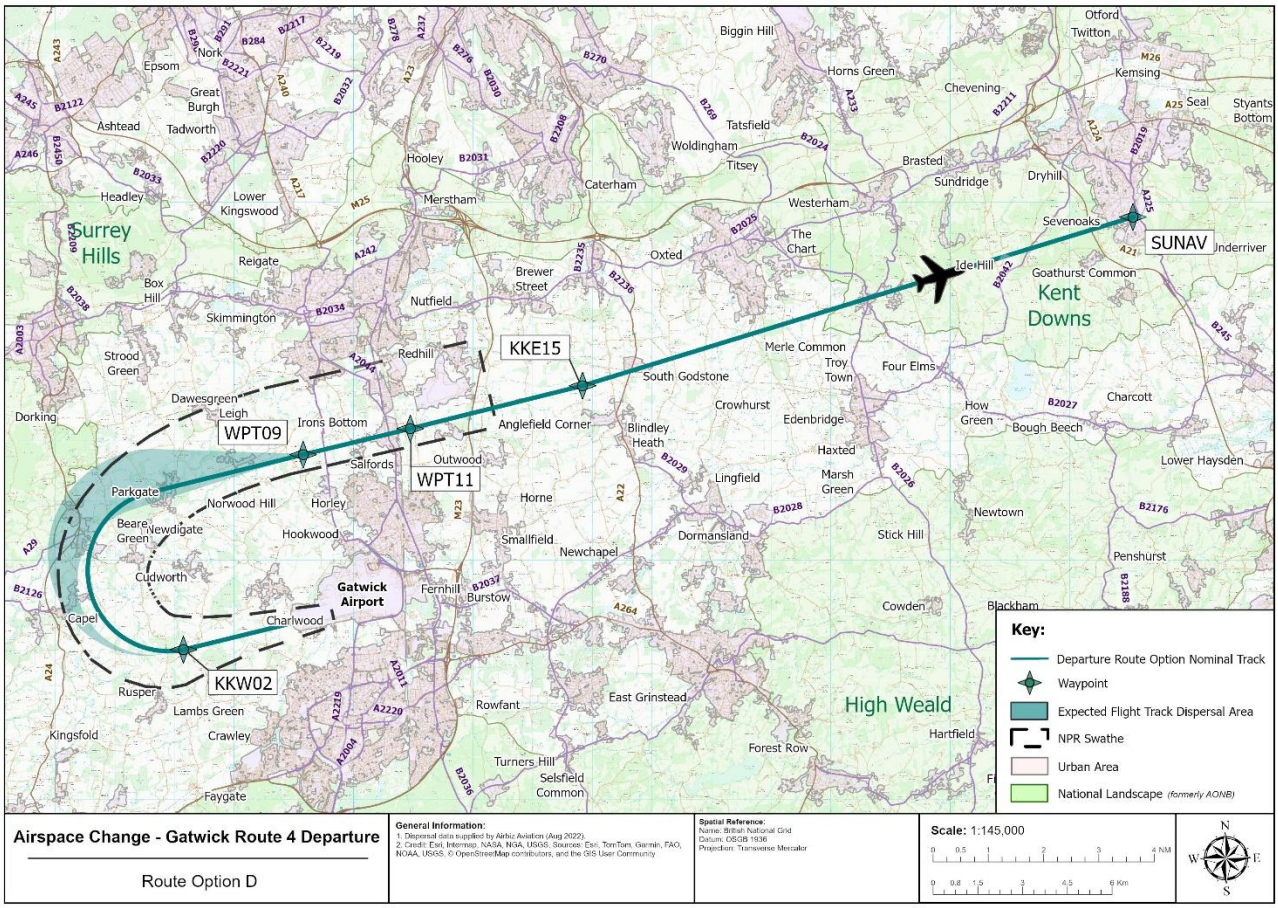
very little lateral track dispersion on the straight legs, as can be seen by the lack of an anticipated dispersion swathe after waypoint WPT09 in Figure 11 below.

4.3.31 The two waypoints, WPT09 and WPT11, have been added to also impose restrictions on the flight profile due to airspace restrictions and interactions with other adjacent routes. These airspace restrictions require that waypoint WPT09 is flown at or above 3,200 ft AMSL and waypoint WPT11 at or below 4,000 ft AMSL, where the speed restriction of 220 KIAS is raised to 250 KIAS. Both waypoints are designated as 'fly by' waypoints, which means that aircraft may not necessarily overfly the points as the aircraft's FMS could anticipate any turn and turn the aircraft prior to arriving at the waypoint. However, due to the nature of the route for this procedure and the lack of turns following the initial right-hand turn, it is likely that these waypoints will be overflown by departing aircraft.

4.3.32 KKE15 is designated as a 'fly by' waypoint, which means that aircraft may not necessarily overfly the point because the aircraft's FMS will direct the aircraft to begin the turn to the next course prior to reaching the waypoint to intercept the next route segment. This is known as turn anticipation. However, since the track adjustment is only 3°, it is likely that the turn anticipation will be very small and aircraft are likely to overfly the waypoint.

4.3.33 Following waypoint KKE15, aircraft route to SUNAV where they are required to be at 5,000 ft AMSL.

Figure 11 – Image of Option D



5 Assessing the options

5.1.1 Extensive work has been undertaken to identify the potential impacts (positive and negative) of each of the options associated with this ACP. This process is known as 'options appraisal'.

5.1.2 Options appraisal is used as a tool throughout the CAP1616 process to refine the options from an initial longlist, down to a shortlist, and the eventual final preferred option. The options appraisal process is an iterative process which ensures that a reasonable evidence base is made available to all stakeholders early on and increasingly throughout each stage of the airspace change process.

5.1.3 This section provides an overview of the steps taken to identify and quantify the benefits and impacts of the different options for this ACP at Stage 3, including the key findings of these studies.

5.2 Approach to assessing the options

5.2.1 The FOA provides a detailed assessment of the expected impacts and benefits of the proposed route options. It follows the process set out in *CAP1616i: Environmental Assessment Requirements and Guidance for Airspace Change Proposals*,[11] and best practice guidance provided by the UK Government and Department for Transport (DfT).

5.2.2 In the FOA each option is analysed, quantified, monetised, or – where this would be inappropriate – assessed and compared to support respondents in providing an informed response to the consultation and so that a preferred option can be identified. A positive figure indicates a net benefit to society versus the baseline, a negative figure indicates a net impact to society versus the baseline. An example of this is provided below:

Table 5 – Example of option assessment

Option	Affected Group	Impact	Quantitative noise assessment results compared to baseline	Assessment result
Option A	Communities	Noise	Net Present Value of change in noise	+£3,214
Option B	Communities	Noise	Net Present Value of change in noise	+£109,812
Option C	Communities	Noise	Net Present Value of change in noise	+£24,977

[11] CAP1616i: Environmental Assessment Requirements and Guidance for Airspace Change Proposals (https://www.caa.co.uk/publication/download/20867)

Option D	Communities	Noise	Net Present Value of change in noise	+£301,183

5.2.3 Where an impact is assessed quantitatively, this is done in line with the Department for Transport's TAG workbook[12] which provides a framework for placing a monetary value on impacts and benefits so that they can be compared.

5.2.4 The FOA looks at each of the following criteria in detail:

Table 6 – Key criteria for assessment of options in the FOA

Impact	Description and approach to assessment
Noise	The UK aircraft noise model (known as ANCON) calculates impact by comparing noise exposure against estimates of the numbers of people and households within the survey area as well as noise-sensitive buildings (e.g. hospitals). The number of people experiencing exposure to noise from aircraft is then evaluated for impacts on health and quality of life for each option using the DfT's aviation noise TAG workbook (May 2024). For Route 4, noise exposure from air traffic was measured over a 92-day period between 16 June and 15 September 2023. Different impacts and benefits arise for each of the options for the future operation of Route 4. These are set out in Table 7 below. The Environmental Research and Consultancy Department (ERCD) of the CAA has produced the calculations described above in this airspace change.
Local air quality	The FOA considers impact on Air Quality Management Areas (AQMAs), within which local authorities are required to measure, review and assess the impact of air quality on people's health and the environment. Most AQMAs are associated with road traffic emissions. ACPs are required to minimise local air quality emissions, and so the FOA must identify and assess local air quality impacts arising from any changes. Emissions from aircraft above 1,000 ft are unlikely to have a significant impact on local air quality and generally the effects of ACPs are negligible. For Route 4, none of the options fly within or next to local AQMAs therefore there will be no impact or any change in impact. This means a full assessment of local air quality is not required.

[12] TAG data book (https://assets.publishing.service.gov.uk/media/67350f5e54652d03d51610db/tag-data-book-v1.24-nov-2024-v1.0.xlsm)

Greenhouse gas emissions	The FOA must demonstrate how the design and operation of each option will impact greenhouse gas emissions. To do this, a greenhouse gas emissions model of air traffic is used to estimate total annual fuel burn and the amount of carbon dioxide emissions this equates to (in metric tonnes). This is worked out on an annual basis to provide an estimate to the 10th year of operation. For Route 4, different impacts and benefits arise for each of the options. These are set out in Table 7 below. As with the Noise metrics above, the calculations on greenhouse gas emissions have been developed by the ERCD of the CAA.
Tranquillity	The FOA assesses impacts on areas including National Parks, National Landscapes, and local tranquil areas identified through community engagement and therefore identified as such within the design principles. For Route 4, no additional areas were identified so none are included within the design principles. The closest National Park to London Gatwick is the South Downs National Park. None of the options would fly southward towards the South Downs; therefore, there is no impact on the National Park. There is no change in impact on Surrey Hills and Kent Downs National Landscapes, and there continues to be no impact on High Weald National Landscape, for each of the options presented.
Biodiversity	To inform the FOA, environmental studies have been undertaken to identify the environmental impacts or benefits of the different options. In line with the guidance, London Gatwick has completed a Habitats Regulation Screening Exercise to understand any impacts on biodiversity areas and European sites, such as: ▪ Special Areas of Conservation (SAC) and possible SACs; ▪ Special Protection Areas (SPA) and potential SPAs; ▪ Ramsar Sites (wetlands of international importance) and proposed Ramsar sites; ▪ Compensatory habitats (areas used to compensate for damage to SACs, SPAs, and Ramsar sites); ▪ National Nature Reserves (NNRs); ▪ Local Wildlife Sites (LWSs); and ▪ Marine Conservation Zones (MCZs). The outcome of the screening exercise determines if a full Habitats Regulations Assessment (HRA) is needed. For Route 4, none of the options would overfly any new designated sites or new biodiversity areas or bring about any changes in impact to these areas. Therefore, a full HRA is not necessary.
Capacity and resilience	The guidance requires London Gatwick to assess the effect of the proposal on overall UK infrastructure.

	Route 4 operations support the airport's overall current and future capacity requirements and provide resilience in the event of an issue with another departure route. Each of the options presented would support the current London Gatwick capacity. There is no change between the options and the baseline when considering resilience.
Access	There are no proposed changes to the accessibility of Route 4 to aviation users as part of this ACP; arrival and departure operations will continue as they currently exist.
Economic impact from increased effective capacity	The FOA must explore any change in air transport movements and estimated passenger numbers or cargo tonnes. As current operations enable the full use of capacity at London Gatwick there would be no changes arising from any of the options presented. The options are not designed to facilitate extra capacity but to enable the full use of current capacity. Overall, none of the options are expected to reduce the flow of air traffic out of the airport.
Fuel burn	To measure total fuel burn, a greenhouse gas emissions model of air traffic is used to estimate total annual fuel burn and the amount of carbon dioxide emissions this equates to (in metric tonnes). Total fuel burn refers to the sum of fuel used for taxiing, taking off, climbing, cruising, approaching and landing; that is, the total amount used to power the aircraft for the entire journey. The forecast uses assumptions based on fleets, aircraft efficiency and fuel costs. Calculations have been developed by the ERCD of the CAA. This is worked out on an annual basis to provide an estimate to the 10th year of operation. For Route 4, different impacts and benefits arise for each of the options. These are set out in Table 7 below.
Training costs	The FOA must demonstrate where a proposal would lead to a need for retraining. There are no retraining requirements – and therefore no associated retraining costs – arising from any of the options presented.
Other costs (Commercial airlines)	Where other costs on commercial aviation arise, these must be identified and assessed within the FOA. There are no associated costs arising from any of the options presented.
Infrastructure costs	Where a proposal would lead to a change in infrastructure costs, they must be identified and assessed within the FOA. For Route 4, there are no infrastructure costs associated with any of the options presented.
Operational costs	Where a proposal would lead to a change in operational costs they must be identified and assessed within the FOA. For Route 4, there are no changes to operational costs associated with any of the options presented.

Deployment costs	Where a proposal would require deployment costs, they must be identified and assessed within the FOA. For Route 4, there is an equal deployment cost for each of the options.
Other costs (on airports or air navigation service provider)	Where there are likely to be other costs on airports or air navigation services, they must be identified and assessed within the FOA. For Route 4, there are no other costs associated with the options presented and, as a result, this criteria is not included in the comparisons of the options.

5.2.5 For more information on the methodology, metrics or the guidance followed in developing the FOA, please read Section 2.3 of the FOA.

5.2.6 The FOA also includes a full environmental assessment of the route options, including direct and indirect environmental impacts, as well as the methodology and metrics used for the study.

5.2.7 The FOA is available to view on Citizen Space at www.route4acp.co.uk.

5.3 Impact analysis of the options

5.3.1 Table 7 provides a summary of the impacts and benefits of each option. The impacts of each option are presented with reference to the baseline, for comparative purposes and to enable an assessment of the relative impacts of each option to be made.

5.3.2 The methodology in the FOA uses current day data, plus forecast data for Year 1 and Year 10 of the change for each of the options. The examples provided in this document use the Year 10 forecast data, for anything else please see the FOA.

5.3.3 The relative impacts have been RAG (Red, Amber, Green) rated to provide a visual indication of the benefits of each option, with grey indicating no change when compared to the baseline.

Table 7 – RAG impact analysis of the options against the baseline for the forecast year (2036)

Impact	Baseline – compared to current day operations	Option A – compared to the baseline	Option B – compared to the baseline	Option C – compared to the baseline	Option D – compared to the baseline
Noise impact on health and quality of life	No change between the baseline and current operations.	Option A would result in increased daytime noise for 203 individuals (net), reduced night-time noise for 251 individuals (net), with an overall net benefit of £3,214.	Option B would result in decreased daytime noise for 458 individuals (net), reduced night-time noise for 770 individuals (net), with an overall net benefit of £109,812.	Option C would result in decreased daytime noise for 30 individuals (net), reduced night-time noise for 132 individuals (net), with an overall net benefit of £24,977.	Option D would result in decreased daytime noise for 889 individuals (net), reduced night-time noise for 368 individuals (net), with an overall net benefit of £301,183.
Air quality	No change between the baseline and current operations.	No change between Option A and the baseline.	No change between Option B and the baseline.	No change between Option C and the baseline.	No change between Option D and the baseline.
Greenhouse gas impact	Calculated mass of CO_2 emitted in forecast year (2036) is 1,229,681 metric tonnes.	Option A would see an increase in CO_2 (equivalent) emissions of +525 tonnes, and an overall net impact of -£42,287.	Option B would see a decrease in CO_2 (equivalent) emissions of -495 tonnes and an overall net benefit of £67,465.	Option C would see an increase in CO_2 (equivalent) emissions of +879 tonnes and an overall net impact of -£79,904.	Option D would see a decrease in CO_2 (equivalent) emissions of -2,901 tonnes and an overall net benefit of +£325,159.
Tranquillity	No change between the baseline and current operations.	No change between Option A and the baseline.	No change between Option B and the baseline.	No change between Option C and the baseline.	No change between Option D and the baseline.
Biodiversity	No change between the baseline and current operations.	No change between Option A and the baseline.	No change between Option B and the baseline.	No change between Option C and the baseline.	No change between Option D and the baseline.

Capacity and resilience	No change between the baseline and current operations.	No change between Option A and the baseline.	No change between Option B and the baseline.	No change between Option C and the baseline.	No change between Option D and the baseline.
Access	No change between the baseline and current operations.	No change between Option A and the baseline.	No change between Option B and the baseline.	No change between Option C and the baseline.	No change between Option D and the baseline.
Economic impact from increased effective capacity	No change between the baseline and current operations.	No change between Option A and the baseline.	No change between Option B and the baseline.	No change between Option C and the baseline.	No change between Option D and the baseline.
Fuel burn	Calculated total fuel burn for forecast year (2036) is 386,891 metric tonnes.	Option A forecast indicates an increase in annual fuel burn of +17 tonnes, and an overall net impact of -£19,380.	Option B forecast indicates a reduction in annual fuel burn of -11 tonnes, and an overall net benefit of +£12,540.	Option C forecast indicates an increase in annual fuel burn of +27 tonnes, and an overall net impact of -£30,780.	Option D forecast indicates a reduction in annual fuel burn of -79 tonnes, and an overall net benefit of £90,060.
Training costs	No change between the baseline and current operations.	No change between Option A and the baseline.	No change between Option B and the baseline.	No change between Option C and the baseline.	No change between Option D and the baseline.
Other costs	No change between the baseline and current operations.	No change between Option A and the baseline.	No change between Option B and the baseline.	No change between Option C and the baseline.	No change between Option D and the baseline.
Infrastructure costs	No change between the baseline and current operations.	No change between Option A and the baseline.	No change between Option B and the baseline.	No change between Option C and the baseline.	No change between Option D and the baseline.
Operational costs	No change between the baseline and current operations.	No change between Option A and the baseline.	No change between Option B and the baseline.	No change between Option C and the baseline.	No change between Option D and the baseline.

Deployment costs	No change between the baseline and current operations.	Option A forecast indicates a £60,000 increase in deployment costs.	Option B forecast indicates a £60,000 increase in deployment costs.	Option C forecast indicates a £60,000 increase in deployment costs.	Option D forecast indicates a £60,000 increase in deployment costs.

5.4 Comparison of the options

5.4.1 Where differences exist in the predicted impact of each of the options – for example, in terms of noise, greenhouse gas emissions, and fuel burn – the FOA provides further analysis to enable a more informed comparison to be made.

5.4.2 The key outputs of this analysis as they relate to the noise impacts of the different options are summarised below. For a detailed comparison of the greenhouse gas emissions and fuel burn impacts, please refer to Section 9 of the FOA.

Exposure to noise

5.4.3 Analysis has been undertaken to identify the number of individuals experiencing either an increase of or a decrease in noise levels for each of the options. The results of this assessment are set out below.

5.4.4 As the table below compares data for increased noise with that of reduced noise, a higher value does not necessarily equate to a positive outcome. The overall change row for both day and night represents the combined impact against the baseline.

5.4.5 The relative impacts have been RAG (Red, Amber, Green) rated to provide a visual indication of the benefits of each option, with grey indicating no change when compared to the baseline.

Table 8 - Exposure to change in daytime noise levels for forecast year (2036)

Net change in exposure to noise (daytime) - 2036

	Option A – compared to baseline	Option B – compared to baseline	Option C – compared to baseline	Option D – compared to baseline
Increased noise (daytime)	664	752	285	550
Reduced noise (daytime)	461	1210	315	1449
Net change (daytime)	**-203**	**458**	**30**	**899**

Table 9 - Exposure to change in night-time noise levels for forecast year (2036)

Net change in exposure to noise (night-time) - 2036

	Option A – compared to baseline	Option B – compared to baseline	Option C – compared to baseline	Option D – compared to baseline
Increased noise (night-time)	268	320	163	349
Reduced noise (night-time)	519	1090	297	717
Net change (night-time)	**251**	**770**	**134**	**368**

Table 10 - Exposure to change noise levels (daytime & night-time combined) for forecast year (2036)

Overall net change in exposure to noise (daytime & night-time combined) – 2036

	Option A – compared to baseline	Option B – compared to baseline	Option C – compared to baseline	Option D – compared to baseline
Overall net change	48	1,228	164	1,267

5.4.6 In addition to this, the FOA provides detailed maps (known as noise contours) showing changes in exposure to daytime and night-time noise in 3bB increments for the areas potentially affected by this ACP (positively or negatively). These maps can be found at Appendices A1 to A5 of the FOA.

Impacts of noise

5.4.7 An assessment has been undertaken to establish the impacts associated with changes in noise exposure. This assessment has been undertaken over the 10-year appraisal period, with the findings presented in terms of Net Present Value (NPV) in 2010 prices.

5.4.8 A positive figure indicates a positive benefit; for example, a reduction in noise-related adverse health impacts. The relative impacts have been RAG (Red, Amber, Green) rated to provide a visual indication of the benefits of each option, with grey indicating no change when compared to the baseline.

Table 11 – Net Present Value (NPV) assessment of noise impacts over 10-year appraisal period (2026 – 2036)

Impact	Net present value of costs			
	Option A – compared to baseline	Option B – compared to baseline	Option C – compared to baseline	Option D – compared to baseline
Sleep disturbance	+£23,942	+£74,622	+£19,203	+£126,611
Amenity	–£14,124	+£25,787	+£4,494	+£123,438
Heart attack (AMI[13])	–£162	+£244	+£45	+£533
Stroke	–£2,566	+£3,655	+£494	+£20,169
Dementia	–£3,876	+£5,504	+£741	+£30,432
Total (change in noise)	**+£3,214**	**+£109,812**	**+£24,977**	**+£301,183**

Overflight assessment

5.4.9 An overflight assessment has been carried out to determine the number of individuals perceived to be overflown by aircraft in relation to the different options. This is not a measure of noise but a demonstration of the pattern and dispersal of traffic, which can lead to a perception of overflight.

5.4.10 The results of this assessment are set out below. The full overflight contour diagrams and tables of results have been included in Appendices A1 to A5 of the FOA for the Baseline and each option.

Table 12 – Summer day overflight assessment for forecast year (2036)

Summer Day 2036 – Population

Overflights per day	Baseline	Option A	Option B	Option C	Option D
>5	444,100	434,300	434,100	434,900	438,700
>10	338,500	332,300	332,100	332,900	336,100
>20	263,400	257,300	256,300	257,000	258,100
>50	74,700	73,500	71,900	72,100	68,300
>100	10,500	14,700	16,700	14,000	14,000

[13] AMI = Acute Myocardial Infarction (Heart Attack)

>200	3,200	3,200	3,200	3,200	3,200

Table 13 – Summer night overflight assessment for forecast year (2036)

Summer Night 2036 – Population

Overflights per day	**Baseline**	**Option A**	**Option B**	**Option C**	**Option D**
>5	182,400	174,600	173,100	173,400	169,900
>10	41,600	44,800	44,300	43,800	41,400
>20	5,800	5,800	5,800	5,800	5,800
>50	2,500	2,500	2,400	2,500	2,400

6 The results

6.1.1 As described in Section 5.2, to compare different impacts and benefits on an equivalent basis, the guidance instructs change sponsors to quantify or 'monetise' the results of the FOA. Positive figure indicates a net benefit to society versus the baseline, and vice versa.

6.1.2 A full description of each criterion, and the approach taken to assessing it, are outlined in Table 6 (above).

6.1.3 Table 7 shows the overall value (positive or negative) of each impact for all the options, compared against the baseline. To see a breakdown of this information or view the full data, please see the FOA.

6.1.4 The relative impacts have been RAG (Red, Amber, Green) rated to provide a visual indication of the benefits of each option, with grey indicating no change when compared to the baseline.

Table 14 – Monetised analysis of the options

Change compared to baseline in monetised terms

Impact	Option A	Option B	Option C	Option D
Change in noise	+£3,214	+£109,812	+£24,977	+£301,183
Overall CO2 equivalent emissions	–£42,287	+£67,465	–£79,904	+£325,159
Fuel Burn (2027)	–£18,240	+£22,800	–£31,920	+£118,560
Fuel Burn (2036)	–£19,380	+£12,540	–£30,780	+£90,060
Local Air Quality	£0	£0	£0	£0
Tranquillity	£0	£0	£0	£0
Biodiversity	£0	£0	£0	£0
Economic impact from increased effective capacity	£0	£0	£0	£0
Total	**-£76,693**	**+£212,617**	**-£117,627**	**+£834,962**

7 Conclusion

7.1.1 Based on the analysis completed, Option D is the preferred option because it is forecast to have the greatest potential environmental benefits. Option D performs best in each of the study areas where there lies a change from the baseline, such as impacts arising from noise, a reduction in fuel burn and CO_2 emissions.

7.1.2 Option B is the second-best performing option, with positive (though reduced when compared to Option D) benefits for the impact of the change in noise, CO_2 emissions and fuel burn.

7.1.3 Option A is assessed as being the third-best performing option. Although the impact of the change in noise is the worst performing, it still provides a positive benefit over the baseline. Although the CO_2 equivalent emissions and fuel burn are better than Option C, this option performs worse than the baseline in these impacts.

7.1.4 Option C is assessed as being the worst performing option.

7.1.5 Operationally, there is no difference between the options, so Option D has been selected as the preferred option based on this appraisal.

7.1.6 While Option D offers the greatest potential environmental benefits, London Gatwick has no opinion on which of the options is delivered. London Gatwick has followed the CAA's guidance and fulfilled its statutory duties with regards to the airspace change process.

7.1.7 To take part in the consultation and have your say on the future of Route 4, please read Section 8 below.

8 How to participate in this consultation

8.1 Who this consultation is open to

8.1.1 The CAA requires us to conduct a public consultation in accordance with Stage 3 of the CAP1616 process.

8.1.2 This consultation builds on engagement undertaken with representative stakeholders during Stage 1 and Stage 2 of the process and is open to anybody with an interest in this ACP who feels directly or indirectly impacted or who has a view that they would like to be considered.

8.2 How London Gatwick has promoted this consultation

8.2.1 To ensure consultation activity is targeted towards those living, working or otherwise using the areas likely to be most affected by this ACP, London Gatwick has employed a zoning system to identify additional stakeholders and members of the public that have not been engaged with as part of Stage 1 or 2 of the process.

8.2.2 The mapping of these zones has been informed by noise contours generated within the Full Options Appraisal (FOA) with additional buffer areas applied as outline in the table below. Noise contours are indicated by LAeq, which is a noise metric that represents the constant sound level which would contain the same total acoustic energy as the actual fluctuating sound over a specified period.

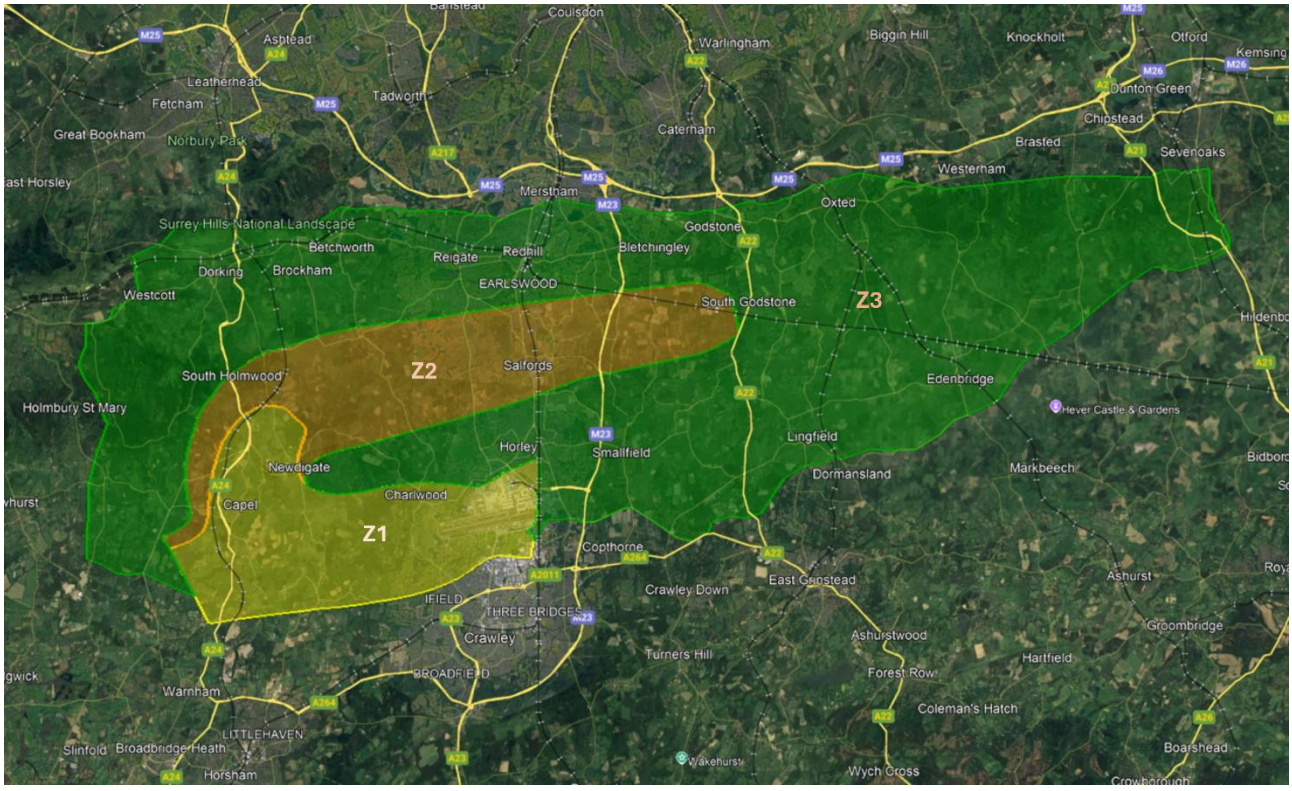
Table 15 – Zoning systems for identifying new stakeholders

Zone	Definition
Zone 1 (Z1)	Zone 1 represents the worst-case area covered by $L_{Aeq,\ 16h}$ and $L_{Aeq,\ 8h}$ noise contours for the baseline route and the 4 proposed ACP options for Route 4. This accounts for areas that experience average noise levels of 51dB or higher between 07:00 and 23:00 and/or average noise levels of 45dB or higher between 23:00 and 07:00. The daytime contours were modelled assuming the 20-year (2004-2023) average runway modal split of 75% west / 25% east. For night, runway data prior to 2014 were not available, thus the 10-year (2014-2023) average runway modal split of 71% west / 29% east was used. In the event that only part of a postcode area is covered by the $L_{Aeq,\ 16h}$ or $L_{Aeq,\ 8h}$ noise contours, the whole postcode area has been considered as being contained within the Zone boundary. This area comprises 5,200 residential and business addresses.

Zone 2 (Z2)	Zone 2 represents the area covered by N65 day noise contours and N60 night noise contours which are not already covered by Zone 1. This accounts for areas that experience 20 or more aircraft noise events that exceed 65dB between 07:00 and 23:00 and/or 10 or more aircraft noise events that exceed 60dB between 23:00 and 07:00. In the event that only part of a postcode area is covered by the N65 or N60 noise contours, the whole postcode area has been considered as being contained within the Zone 2 boundary. This area comprises 6,130 residential and business addresses.
Zone 3 (Z3)	Zone 3 represents the area which is otherwise potentially affected by this ACP based on current and historical data on Route 4 overflight. This area comprises 75,314 residential and business addresses.

8.2.3 These zones are depicted in Figure 12 with Zone 1 shaded yellow, Zone 2 shaded orange and Zone 3 shaded green.

Figure 12 – The three consultation zones



Map data ©2024 Ordnance Survey

8.2.4 Alongside this, London Gatwick has undertaken a detailed stakeholder mapping exercise to identify all stakeholders of relevant to this ACP.

8.2.5 London Gatwick has also identified several audiences that may be considered digitally excluded or seldom heard, and it has tailored its approach to engaging with these audiences to ensure this consultation fully accessible.

8.2.6 To promote this consultation, London Gatwick has written to local stakeholders, mailed newsletters directly to residents, published adverts in local newspapers, issued a press release to media outlets, displayed advertising posters in community locations, and publicised the consultation on social media.

8.2.7 The Consultation Strategy for this ACP includes more information about how London Gatwick has identified the audience for this consultation and the approach to tailoring the consultation material to different audiences.

8.2.8 The Consultation Strategy formed part of the Stage 3 Gateway, which London Gatwick passed in November 2025.

8.3 How to take part in the consultation

8.3.1 The consultation will run for a 14-week period starting on 20 January 2026 and ending at 23:59 on 28 April 2026.

8.3.2 There are a wide range of ways to take part in the consultation, as outlined below.

Consultation events

8.3.3 During the consultation, London Gatwick is hosting four consultation events so communities and stakeholders can view information about this ACP, speak directly with the project team and get their questions answered.

Table 16 – Consultation events

Date	Time	Venue and Address
Thursday 12 February 2026	2pm to 8pm	Reigate Manor Reigate Hill, Reigate RH2 9PF
Saturday 7 March 2026	10am to 4pm	Sandman Signature Hotel 18-23 Tinsley Ln S, Three Bridges, Crawley RH10 8XH
Monday 16 March 2026	2pm to 8pm	Donnington Manor Hotel London Rd, Dunton Green, Sevenoaks TN13 2TD
Tuesday 24 March 2026	2pm to 8pm	Denbies Vineyard Bradley Ln, Dorking RH5 6AA

8.3.4 Any unavoidable changes to the dates or times for any of the events will be set out on Citizen Space at www.route4acp.co.uk as far in advance as possible.

Webinars

8.3.5 London Gatwick is also hosting six webinars, which will include a presentation about this ACP which will reflect that available at any in-person public exhibitions. Each webinar will include a question-and-answer session.

Table 17 – Webinars

Date	Time	Registration Link
Tuesday 10 February	6pm-7pm	https://events.teams.microsoft.com/event/b21641ea-e5b9-4ad5-9992-493f83cd9c84@873b7292-5469-4a05-9740-0332e6cbc72d
Monday 23 February	11am-12pm	https://events.teams.microsoft.com/event/bd4d9bc4-b055-4d25-91d4-6ad8dcfd8aa3@873b7292-5469-4a05-9740-0332e6cbc72d
Wednesday 4 March	7pm-8pm	https://events.teams.microsoft.com/event/739df7fe-4d6f-435f-97af-ebf5f380630f@873b7292-5469-4a05-9740-0332e6cbc72d
Thursday 12 March	6pm-7pm	https://events.teams.microsoft.com/event/bd4526a3-4277-4b4d-8e59-811d3e22a2b9@873b7292-5469-4a05-9740-0332e6cbc72d
Wednesday 18 March	2pm-3pm	https://events.teams.microsoft.com/event/cdc41415-a4ab-4a07-b8ed-a6a6f75678c4@873b7292-5469-4a05-9740-0332e6cbc72d
Thursday 26 March	5:30pm-6:30pm	https://events.teams.microsoft.com/event/a97ba7ea-f3cb-4dd5-8490-30e67729967f@873b7292-5469-4a05-9740-0332e6cbc72d

8.3.6 You can sign up for a webinar using the links in the table above or by contacting the team using the information shown in Section 5.4.

Citizen Space

8.3.7 All the information London Gatwick has available to share about this ACP is available on Citizen Space: www.route4acp.co.uk

8.3.8 Citizen Space contains a feedback form so you can respond to the consultation.

Deposit points

8.3.9 Printed copies of the key consultation materials – including this Consultation Document, the feedback form and freepost envelope – are available to view at the following locations during the consultation period from 20 January 2026 to 28 April 2026:

Table 18 – Deposit locations

Venue	Address	Opening Hours						
		MON	TUE	WED	THU	FRI	SAT	SUN
Dorking Library	St Martin's Walk, Dorking RH4 1UT	09:30-17:30	09:30-19:00	09:30-17:30	09:30-19:00	09:30-17:30	09:30-17:00	Closed
Reigate Library	Bancroft House, Bancroft Road, Reigate RH2 7RP	Closed	09:30-17:00	09:30-17:00	09:30-17:00	09:30-17:00	09:30-17:00	Closed
Horley Library	55-57 Russell Square, Victoria Road, Horley RH6 7QH	Closed	09:30-17:00	09:30-17:00	09:30-17:00	09:30-17:00	09:30-17:00	Closed
Edenbridge Library	The Eden Centre, Four Elms Road, Edenbridge TN8 6BY	09:00-13:00	09:00-17:00	09:00-17:00	09:00-17:00	13:00-17:00	10:00-15:00	Closed

8.3.10 The opening times of these deposit locations are determined by third-party organisations and may be subject to change. Please check with the venue before you travel.

8.4 How to ask questions

8.4.1 You can contact London Gatwick with questions about this ACP, or request assistance in responding to the consultation, via the following channels:

- Citizen Space site: www.route4acp.co.uk
- Email: LGWairspace.Rte4@gatwickairport.com
- Freephone: 0808 303 4560
- Freepost: FREEPOST ROUTE 4 CONSULTATION

8.4.2 A frequently asked questions page will be available on Citizen Space, responding to questions raised directly to the project team, within feedback, or at any of the online sessions. This will be updated throughout the consultation period.

8.5 How to respond to the consultation

8.5.1 You can provide feedback between 20 January 2026 and 23:59 on 28 April 2026.

8.5.2 You can respond to the consultation using the online questionnaire on Citizen Space, which can be accessed via the following link: www.route4acp.co.uk

8.5.3 If for any reason you are unable to access Citizen Space, London Gatwick will accept postal responses to the Freepost address: 'FREEPOST ROUTE 4 CONSULTATION' until 28 April 2026.

8.5.4 Postal responses will be accepted up to three working days after this deadline. Responses received after this date might not be taken into consideration.

8.5.5 A copy of the feedback form is included at Appendix 1 of this document.

8.6 How London Gatwick will handle consultation responses

8.6.1 All consultation responses will be published on the CAA's Airspace Change Portal, as required by the CAA.

8.6.2 London Gatwick will upload postal responses to the portal on behalf of respondents. All stakeholders have the option to redact personal information, such as name, address, and position from publication; please select your preference when submitting your feedback.

8.6.3 Where needed, London Gatwick may moderate consultation responses to remove offensive material not appropriate for publication.

8.7 How London Gatwick will use your feedback from this consultation

8.7.1 The public consultation will close on 28 April 2026. Following this date, London Gatwick will categorise the consultation responses into those that may present information that may lead to a change in the design and those that could not.

8.7.2 A Consultation Response Document will be prepared for London Gatwick's submission to the CAA. It will include information on how the consultation was delivered and demonstrate how the feedback received has been considered and understood.

9 Next steps

9.1 Next steps after the consultation

9.1.1 Once London Gatwick has reviewed all the consultation feedback, it will consider the need to update the design of the ACP in the light of the information received during the consultation. If major changes are required, then it may be appropriate to re-consult with stakeholders.

9.1.2 If further consultation is not required, then London Gatwick will prepare the final documentation for submission to the CAA, under Stage 4 of the CAP1616 process. The Consultation Response Document and the Final Options Appraisal will be submitted to the CAA and published on the CAA Portal.

9.1.3 The full airspace change proposal submission must follow the format identified in CAP1616. Once finalised this document will be submitted to the CAA. London Gatwick currently expects this to be in January 2027.

9.1.4 As part of the final submission, London Gatwick will be producing the following documents:

- A Final Options Appraisal (FOA);
- Environment Assessment;
- Habitats Regulations Assessment; and,
- Final airspace change proposal and all required evidence.

9.1.5 The CAA will review and assess the final ACP and may request further information or clarification ahead of making the regulatory decision. The CAA will then decide whether to approve the final ACP. This decision may be subject to modifications to, and conditions on, the final ACP.

9.1.6 At Stage 6, the approved final ACP will be implemented. At Stage 7, the Post Implementation Review will analyse the impacts of the implemented airspace change to allow the CAA to determine if it has produced the intended outcomes.

9.2 Reversion Statement

9.2.1 CAP1616 requires sponsors to be clear with stakeholders about the extent to which the proposed airspace change, once implemented, is reversible if it does not meet the objectives it is designed to achieve. This takes place as part of the Post Implementation Review at Stage 7.

9.2.2 In the unlikely event that this ACP requires reversal once approved and implemented, there are anticipated to be a number of possible reversion scenarios. This could include further work by London Gatwick to redesign the

revised route to overcome the issues identified. Depending on the extent of the re-work required, this scenario may require further engagement with communities and stakeholders to gather additional feedback on the redesigned route option before prior to its formal submission to the CAA.

9.2.3 The obvious reverse state would be the full withdrawal and reversion to the historical conventional procedure being flown using RNAV substitution (current operation and baseline for this ACP). As described elsewhere in this document, this state is currently temporary, and would eventually, and barring intervention, result in the Route 4 procedure being fully withdrawn.

9.3 The alternative scenario could include designating the route(s) implemented through this ACP as temporary pending eventual implementation of a permanent solution, through a subsequent airspace change process (e.g. Future Airspace Strategy Implementation airspace change programme)[14].

[14] Further information about the Government's Airspace Modernisation Strategy (AMS) and the Future Airspace Strategy Implementation (FASI) airspace change program can be found here: https://www.gov.uk/government/publications/airspace-modernisation/airspace-modernisation

10 Abbreviations

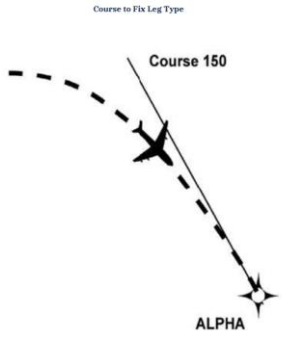
Table 19 – Abbreviations

Term	Description
ACP	Airspace Change Proposal
AMS	Airspace Modernisation Strategy
AMSL	Above Mean Sea Level
CAA	Civil Aviation Authority
CAP	Civil Aviation Publication
ERCD	Environmental Research and Consultancy Department
FASI	Future Airspace Strategy Implementation
FAQ	Frequently Asked Questions
FOA	Full Options Appraisal
IOA	Initial Options Appraisal
KIAS	Knots Indicated Airspeed
LAM	Lambourne (VOR Waypoint)
NM	Nautical Miles
NPR	Noise Preferential Route
ONS	Office for National Statistics
PBN	Performance Based Navigation
PIR	Post Implementation Review
RNAV	Area Navigation
SID	Standard Instrument Departure
SoN	Statement of Need

11 Glossary of terms

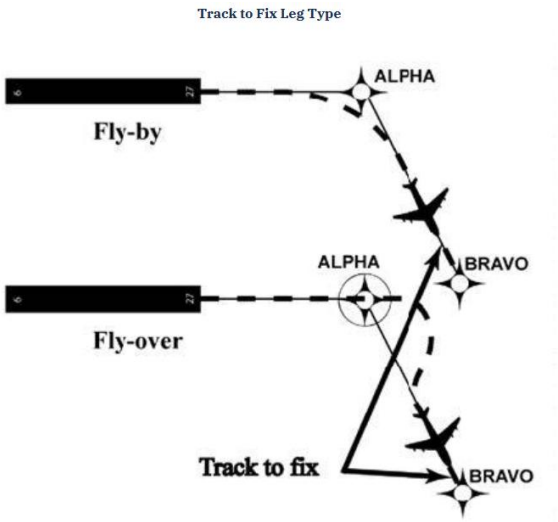
Table 20 – Glossary of Terms

Term	Definition
Airspace	Airspace is the invisible infrastructure in the sky which helps aircraft navigate safely. This includes the flight paths that aircraft use when taking-off, flying and landing, as well as the holding patterns used by aircraft before landing.
Airspace Change Proposal (ACP)	Airspace change proposals are requests from a 'change sponsor', usually an airport or a provider of air navigation services (including Air Traffic Control), to change the notified airspace design. Airspace change proposals must follow the CAA's airspace change process, known as CAP1616. The process is structured, comprising of different stages and gateways depending on the type of airspace change proposal that has been requested. Both change sponsors and the CAA are involved in the airspace change process, resulting in a final decision by the CAA to approve or reject the airspace change proposal.
Airspace Modernisation Strategy (AMS)	The CAA and the Department for Transport (DfT) have developed a shared vision for the modernisation of UK airspace. The vision is to deliver quicker, quieter, and cleaner journeys and more capacity for the benefit of those who use and are affected by UK airspace. This vision is known as the Airspace Modernisation Strategy (AMS) and sets out ways of modernising the design, technology, and operations of airspace. The AMS is based on four strategic objectives: Safety, Integration, Simplification and Environment.
Above Mean Sea Level (AMSL)	Above Mean Sea Level is a measurement of the height of an object from the average level of the ocean's surface.
Area Navigation (RNAV)	Area Navigation (RNAV) enables aircraft to operate on any desired flight path within the coverage of ground- or space-based navigation aids, or within the limits of onboard self-contained systems, or a combination of these. This flexibility allows for more efficient flight routes, reduced congestion, and improved access to airports without conventional navigation aids.
Baseline	The 'baseline' acts as a starting point or reference point which is used to compare the different airspace change options proposed as part of the airspace change proposal. In the context of airspace change, the baseline is a scenario that represents what the airspace would look like without any proposed changes. It is important because it helps decision-makers, key stakeholders and local communities understand how the proposed changes differ from the current-day operation of Route 4. The baseline scenario assumes that the airspace stays the same as it now but also considers any expected changes in how the airspace is likely to be used, like a change to the number or type of aircraft.

Change Sponsor	A change sponsor is the applicant bringing forward an Airspace Change Proposal. Change sponsors are typically an airport or provider of air navigation services.
Civil Aviation Authority (CAA)	The Civil Aviation Authority (CAA) is the statutory organisation responsible for the regulation of civil aviation in the United Kingdom. Its responsibilities include airspace regulation, air safety, economic regulation and consumer protection. The CAA is a public corporation of the Department for Transport.
Controlled Airspace	Controlled airspace is airspace of defined dimensions within which air traffic control (ATC) services are provided in accordance with the airspace classification. Its purpose is to create a known traffic environment to achieve the objectives of the ATC service to prevent collisions between aircraft and to expedite and maintain an orderly flow of air traffic. The level of control varies with different classes of airspace.
Control Area (CTA)	A control area (CTA) is an area of controlled airspace extending upwards from a specified lower limit above the earth to a specified upper limit. The upper limit should be established when either air traffic control service will not be provided above that level, or there is another (upper) control area above this control area. A control area usually is situated on top of a control zone (CTR) and provides protection to aircraft climbing out from the airport.
Control Zone (CTR)	A control zone (CTR) is a volume of controlled airspace established around an airport in the UK, which extends from the surface to a specified upper limit, established to protect air traffic operating to and from that airport. Aircraft can only fly in a CTR after receiving a specific clearance from air traffic control.
Course to Fix (CF)	A path that terminates at a waypoint with a specified course at that waypoint. This PBN leg type is typically used if the intent of the design is to set the aircraft onto a specified direction after the course to fix waypoint, example: 
Design Principles	At the first stage of an airspace change proposal, a change sponsor needs to set Design Principles. These Design Principles encompass the objectives that the airport seeks to achieve through the airspace change, and they help the airspace designers to create and compare different flight path options. Design Principles include policy, safety, environmental and operational factors. The Design Principles must also consider the local context for the airspace change to take account of priorities within the affected area. They are developed in collaboration with representatives from local communities and other key stakeholders, as required by the CAA's airspace change process.

Development Consent Order (DCO)	A Development Consent Order (DCO) is an application for consent to undertake a Nationally Significant Infrastructure Project (NSIP). An NSIP is a major infrastructure development in England or Wales. NSIPs include projects such as power plants, large renewable energy projects, new airports, airport extensions, and major road projects. A DCO is submitted to the Planning Inspectorate, who will consider the application and make a recommendation to the Secretary of State, who will then decide on whether development consent should be granted for the proposed scheme.
Future Airspace Strategy Implementation (FASI)	The Future Airspace Strategy Implementation (FASI) Airspace Change programme is a delivery element of the Airspace Modernisation Strategy (AMS). FASI is the programme to modernise air traffic services in the UK. FASI is being delivered through 20 UK airports sponsoring airspace change proposals (ACPs) to upgrade the arrival and departure routes that serve their operations in the lower airspace (below 7,000 ft). NATS (En Route) Plc (NERL) is currently sponsoring related ACPs to upgrade the route network that mostly sits above 7,000 ft. These ACPs are strategically important to achieving the AMS objectives at a national and/or regional level.
Full Options Appraisal (FOA)	The FOA is carried out in Stage 3 of the airspace change process. The options appraisal evolves through three phases: the Initial Options Appraisal, the Full Options Appraisal, and the Final Options Appraisal. The FOA requires the 'change sponsor' to develop more rigorous evidence for the design options they plan to consult on. The change sponsor may undertake further work as part of the design process to improve and refine design options before completing the full options appraisal.
Gateway	During the airspace change process, airspace change proposals must pass a series of gateways. The gateway stages act as checkpoints where the Civil Aviation Authority reviews and signs off documentation showing that specific criteria to proceed to the next stage have been met. If the airspace change proposal passes the gateway, it will progress onto the next stage of the process.
Initial Options Appraisal (IOA)	CAP1616 requires sponsors to complete a formal Options Appraisal process that assesses the benefits of various options that are developed at Stage 2A of the airspace change process using the fixed constraints identified at Stage 1A and the Design Principles established in Stage 1B. The initial list of all possible options is tested with stakeholders and then refined into a comprehensive list of options which is carried forward for an initial appraisal at Stage 2B. The Initial Options Appraisal is carried out by comparing all the options side by side against the CAP1616 costs and benefits criteria. A shortlist of options is then compiled which are carried forward to Stage 3 to be assessed in a Full Options Appraisal.
Knots Indicated Airspeed (KIAS)	KIAS refers to the measurement of an aircraft's speed through the air. It is expressed in knots (a unit of speed used in aviation, equivalent to one nautical mile per hour) and is indicated by instruments within the cockpit. This

	measurement specifically represents the speed of the aircraft relative to the air surrounding it, as measured by instruments onboard the aircraft. It is a crucial parameter for pilots to monitor during flight, as it helps ensure safe and efficient operation of the aircraft.
LAeq	LAeq stands for A-weighted Equivalent Continuous Sound Level. It is a noise metric that represents the constant sound level (in decibels, dB) which would contain the same total acoustic energy as the actual fluctuating sound over a specified time period.
National Landscape	A National Landscape, formerly referred to as an Area of Outstanding Natural Beauty (AONB), is land protected by the Countryside and Rights of Way Act 2000. It protects the land to conserve and enhance its natural beauty. National Landscapes are designated for conservation due to their significant landscape value. There are 34 National Landscapes in England.
NATS	NATS formerly known as National Air Traffic Services. NATS is a major air navigation service provider in the UK, responsible for managing air traffic control services and airspace in the UK and certain international regions. NATS provides a range of services including air traffic control, airspace management, navigation assistance, communication services, and aviation data services. They ensure the safe and efficient movement of aircraft in UK airspace and provide support to airlines, pilots, and other aviation stakeholders.
Nautical Miles	A nautical mile is a unit of measurement for distance in air navigation. One nautical mile is equivalent to 1.1508 land-measured miles or 1.852 kilometres.
Navigational Beacons	Navigational beacons are ground-based electronic transmitters that emit radio signals that can be picked up by an aircraft's navigation system to help pilots navigate through the air. These beacons serve as reference points to assist pilots in determining their position, orientation, and direction while flying.
Noise Preferential Route (NPR)	A Noise Preferential Route (NPR) is a track line on a map which aims to minimise the number of people overflown by departing aircraft. NPRs at the designated airports are defined by the Government. NPRs have existed since the late 1950s, when the airports were in public ownership. NPRs have historically acted as an important noise control measure with the design of Standard Instrument Departure routes based upon them. The NPRs are defined with an upper limit, in the case of Route 4 the upper limit is 4000 ft.
NPR Swathe	In 1991 it was decided to include a 1.5km swathe to each side of the NPR centre-line to help with assessing track keeping conformance. NPR Swathes start narrow at the runway and widen to a maximum of 3km, allowing a 1.5km deviation on both sides of the centreline. These swathes were intended to provide communities with information and assurance on where departing aircraft can be expected to be seen and/or heard.
Performance Based Navigation (PBN)	Performance Based Navigation (PBN) is the broad term used to describe the technologies that allow aircraft to fly flexible, accurate, repeatable and therefore deterministic three-dimensional flight paths using onboard equipment and capabilities.

Post Implementation Review (PIR)	The Post Implementation Review (PIR) is an evaluation that is conducted after changes to airspace have been implemented. The PIR assesses the effectiveness and impact of those changes that have been made, identifies any issues or problems that arose during the implementation, and determines whether the intended objectives of the airspace change proposal have been achieved.
Stakeholder	A stakeholder in an airspace change proposal is an individual, group, or organisation that has an interest or concern in the decisions and outcomes associated with the project. Stakeholders in an ACP can include government agencies, airlines, airports, passengers, residents, and environmental organisations.
Standard Instrument Departure (SID)	A SID is a predetermined flight path that aircraft follow after taking off from an airport. SIDs are designed to efficiently and safely guide aircraft from the runway to their en-route phase of flight. They typically include specific instructions regarding altitude, headings, and waypoints to follow. SIDs are established at busy airports or in areas where there is a complex airspace structure to ensure orderly and predictable departures. In practice, the choice of SID used is allocated based on a flight plan submitted by the airline.
Statement of Need	A Statement of Need is a document that outlines the reasons and justifications for the proposed changes to airspace structure or procedures. It outlines what airspace issue or opportunity the change sponsor is seeking to address, as well as the rationale behind the proposed changes.
Track to Fix (TF)	A Track to Fix (TF) leg is intercepted and acquired as the flight track to the following waypoint. This leg type is typically used to direct the aircraft onto the intended/nominal track as soon as possible past a waypoint, either as the waypoint is approached (Fly-by) or crossed (Fly-over), see Waypoint definition below. Additionally, the design would use fly-over if it wishes to minimise dispersion after the turn as aircraft reacquire the track to the next waypoint. Examples: 

Waypoint	A waypoint is a specified geographical location used to define an Area Navigation route or the flight path of an aircraft employing Area Navigation. Waypoints serve as reference points along an aircraft's flight route. They are identified as either Fly-by or Flyover. A Fly-by waypoint requires the aircraft to start turning early to smoothly follow the next segment of its route or flight. A Flyover waypoint is a point at which the aircraft starts to turn to connect with the next part of its route or flight path.

12 Appendices

Appendix 1 – Copy of Feedback Form

Thank you for taking part in our consultation on our Airspace Change Proposal for the future of Route 4. Your feedback is crucial in informing which of the options will be progressed.

Please note, all feedback should be submitted via the Civil Aviation Authority's (CAA) airspace change website which you can access at route4acp.co.uk or by scanning the QR code to the right.

However, if you would like to respond in writing, please complete this feedback form and return it to the following freepost address:

Freepost ROUTE 4 CONSULTATION (no stamp required)

Your feedback will be uploaded to the CAA's airspace change portal by members of the project team in accordance with the Data Protection Statement provided on this form. At the end of the feedback form, you will have the option to have your feedback published anonymously should you wish.

If you require any assistance responding to this consultation, please contact us using the details provided. Please note the deadline for feedback is 23:59 on Tuesday 28 April 2026.

Privacy Statement

By filling in and returning this form to us, you are agreeing that we can hold and process your personal data in relation to this public consultation exercise.

Your personal data will be shared with the Civil Aviation Authority and the London Gatwick project team for evaluation of this Airspace Change Proposal.

Your identifiable, personal data will not be used for any other purposes without your consent. We may use your data to send you updates about the project (where you provide us with your contact details).

About you

1. What is your name?

2. What is your email address?

3. What is your postcode?

4. Are you responding to this consultation as an individual or on behalf of an organisation?

☐ On behalf of an organisation ☐ As an individual

5. If you are responding on behalf of an organisation, what is the name of the organisation?

Data Protection

The data you provide will be processed by Cavendish Consulting Limited (Cavendish). We hold all personal data in accordance with the retained EU law version of t virtue of section 3 of the European Union (Withdrawal) Act 2018, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 as ar Data Retention Policy, and find out how to make a Subject Access Request at the following website address cavendishconsulting.com/data-protection/ or by conta

6. What is your interest in this airspace change proposal? Please tick all that apply.

- [ ] Local resident
- [ ] Local authority
- [ ] Airspace user
- [ ] Community / interest group (please name below)
- [ ] Business group (please name below)
- [ ] Statutory body (please name below)
- [ ] Other (please detail below)

Comment:

7. How did you hear about this consultation?

- [ ] A newsletter delivered to my home address
- [ ] Social media
- [ ] Newspaper advert
- [ ] Poster in my local area
- [ ] Word of mouth
- [ ] Other (please detail below)

Comment:

8. How have you taken part in this consultation?

- [ ] Visited the website
- [ ] Attended an exhibition event
- [ ] Joined a webinar
- [ ] Visited an information point
- [ ] Other (please detail below)

Comment:

9. Please rank the four options in order of preference (with 1 being your most favoured option, and 4 being your least favoured option).

- [ ] Option A
- [ ] Option B
- [ ] Option C
- [ ] Option D
- [ ] None of the above
- [ ] No preference

10. Please explain your response to Question 9. If you selected 'None of the above', please suggest an alternative option.

the General Data Protection Regulation ((EU) 2016/679) (the "UK GDPR"), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by mended, and any successor legislation. Your personal data will not be transferred outside of the EU. You can see our full Privacy Notice, Data Protection Policy, acting us on 01962 893 893 / dataprotection@cavendishconsulting.com.

11. Do you have any feedback or suggestions on how we can deliver further improvements on Option A?

12. Do you have any feedback or suggestions on how we can deliver further improvements on Option B?

13. Do you have any feedback or suggestions on how we can deliver further improvements on Option C?

14. Do you have any feedback or suggestions on how we can deliver further improvements on Option D?

15. Do you have any comments regarding the Full Options Appraisal (FOA) and/or the technical assessments supporting this Airspace Change Proposal?

16. Do you have any further feedback or suggestions you wish to share with us regarding this Airspace Change Proposal?

17. Would you like your name to be published alongside your response? We will not publish postcodes or email addresses.

- [ ] Yes - please publish my name alongside my response
- [ ] No - please publish my response anonymously

If you have any questions, or require assistance, you can contact the team via:

Website: route4acp.co.uk
Email: LGWairspace.Rte4@gatwickairport.com
Freephone: 0808 303 4560
Freepost: Freepost ROUTE 4 CONSULTATION

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