

LADACAN Response to RNAV1 consultation

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I agree that any personal details contained in this response may be sent to the CAA as part of the Airspace Change Proposal.

Please indicate which option you support for implementation along the Runway 26

Brookmans Park (BPK) departure routes by placing a '✓' in ONE box below:

Do not adopt RNAV1 procedures	
Adopt RNAV1 procedures with initial speed restriction of 210 knots	
Adopt RNAV1 procedures with initial speed restriction of 220 knots	✓
Adopt either RNAV1 procedures	

The **Grounds for our Response** are based on the sample flight tracks pre-trial 14/2/13 and during the 220knot trial dated 5/5/13, the former showing a wide spread of actual tracks from the Markyate/Flamstead 'gate' onwards with many overflying NE Hemel & some over SW Redbourn whereas the latter showed a much narrower set of tracks largely clear of both communities. It also means we know where they *should* be in contrast to the current situation. That is all based on the assumptions that

(a) they do in practice *adhere closely to the proposed centreline* and do not drift away from it (as exemplified below) by assuming that anywhere within the designated swathe is acceptable - which would completely undermine the whole concept as the 'new' swathe, even when narrowed from 3 km to 2 km, has for example moved S. to be partly over NE Hemel; and

(b) that the proposed centreline is as it was then with, following our suggestion, the welcome short extension eastwards as far as the St Albans-Harpenden railway line both to help ensure aircraft don't overfly N. St Albans and as an identifiable marker for Swanwick ATC to be aware of. We are however concerned that the mentioned 'exception' clause ("except for safety [accepted] or operational [means what?] reasons") isn't used as an excuse to allow regular deviation from the centreline - a matter of trust.

We have selected 220 knots rather than 210 knots as it appears that the slower speed, counter-intuitively, causes (slightly) more noise problems at ground level, perhaps due to different flap settings or slower climb rate? It would also impose a slightly bigger, & presumably unwelcome, speed/time discipline on, respectively, the pilot and the operator.

The proposal to raise the vectoring altitude from 3,000 to 4,000 feet AMSL is welcome to a degree but with most aircraft already above 4,000 ft by Redbourn, that of itself would not prevent vectoring away from the centreline over S. Harpenden or N. St Albans. We would therefore expect Swanwick to abide by the CAA's 7,000 ft 'advisory' that aircraft should avoid overflying communities as far as possible, by keeping them on the centreline until East of the railway line. This would be in line with Government policy to avoid centres of population where possible though with its obvious disadvantage to rural residents who, with lower background noise levels, are more likely to notice aircraft going over.

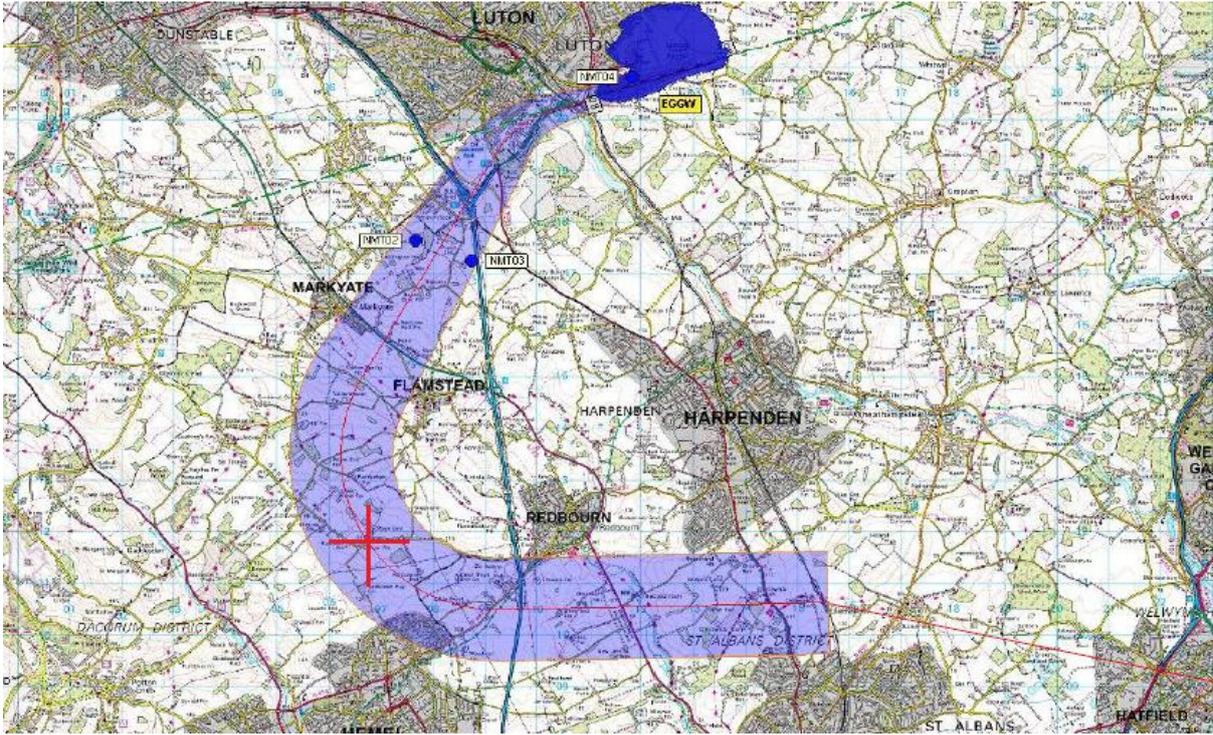
That then is our overall view and other groups no doubt will point to difficulties in particular sections, e.g. as follows:

- that all aircraft should adhere to the centreline on the Southwesterly sector following the first turn and not steer N. of it (perhaps in preparation for the 2nd turn?) and that the 2nd turn shouldn't commence until *after crossing the A5* whereas the above-mentioned 5/5/13 tracks showed some aircraft N. of the centreline at that point [hence over S. Markyate] &/or *starting the turn early* [hence closer to Flamstead than 'should' be]. Also almost all were '*inside*' the prescribed centreline on the section W. of Redbourn (see maps at end);

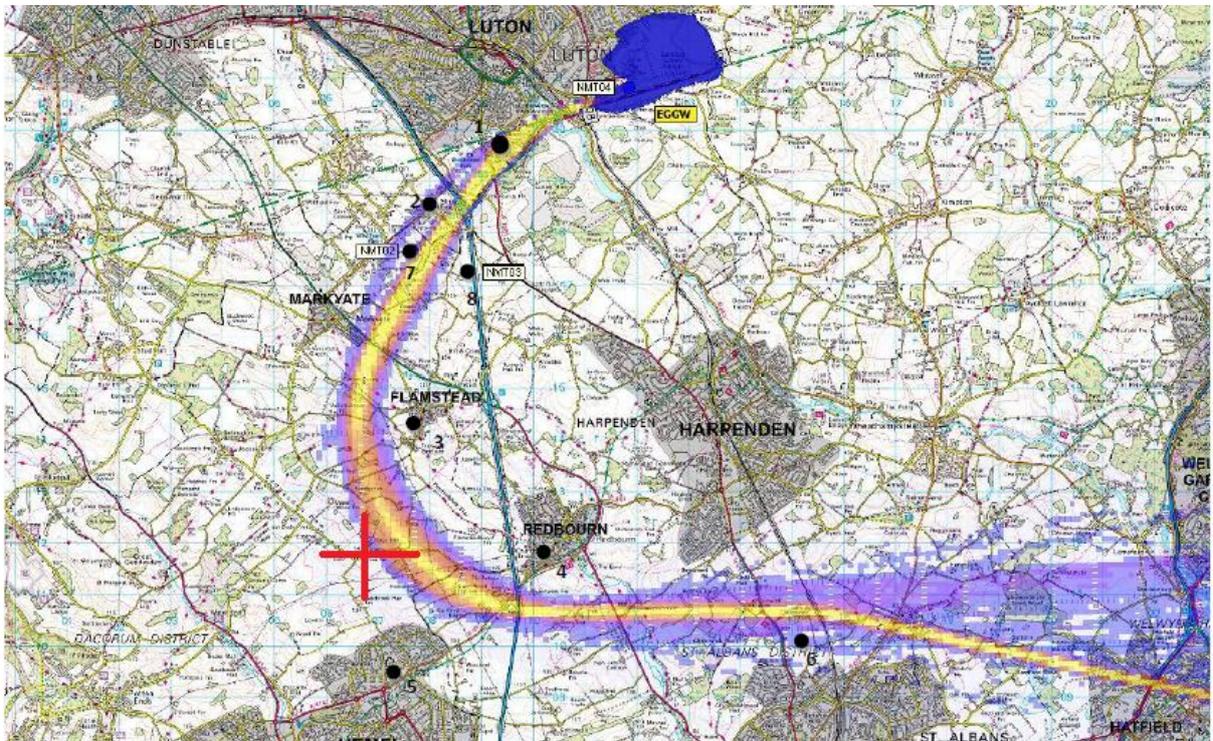
- that Sandridge is more obviously overflowed as it is now under the centreline, so more concentrated than when the tracks were more splayed out. That problem would be eased if the centreline were to be extended eastward a mile or so *beyond* the railway line - a matter for discussion perhaps (but we wouldn't be surprised if ATC responded by noting that by then most aircraft are 6,000 ft above local ground level). The number of registered complaints pre- and post-trial may give a feel for the disturbance caused (as similarly with NE Hemel).

Finally, we are pleased that the Airport management has taken this initiative (& hopefully later will see what can be done for those to the East of the runway). However we note it would mean that a relatively few individuals in rural areas will be expected to endure a worse noise burden for the sake of those in the main communities. Nor does it disguise the fact that many residents, while gaining no financial benefit from the Airport's operations, are now being told to accept yet more flights in the area in the near future as part of the proposed major expansion of activity: some may say the whole exercise is simply a sop to assuage public anger at the current and likely overall worse noise nuisance to come. So much for living in a civilised country.

- John Davis for LADACAN.



Position of SW extreme of SID centre line



Proof that aircraft paths are not distributed around the centre line W of Redbourn: all are inside it