

13 August 2019

By email to: [REDACTED] Manager Airspace Regulation

[REDACTED]
Manager Airspace Regulation
Civil Aviation Authority

Dear [REDACTED],

ACP-2017-43

London Heathrow - Airspace, Departures and Arrivals Procedure - Third runway (FASI South)

I am writing in response to your letter dated 29/07/2019 which states that it is necessary for FASI-South Change Sponsors to adopt a design principle capturing the requirement for the final airspace design to be in accordance with the CAA's published Airspace Modernisation Strategy (CAP1711). Your letter also requests that this design principle be given the highest priority ranking, after the overriding design principle of maintaining a high standard of safety. You also propose in your letter that Heathrow Airport should subsequently re-engage with its stakeholders to this effect and provide evidence of the same for at the Stage 2 Gateway.

As you know, the development of Heathrow's Design Principles concluded in August 2018 and passed through the CAA's Gateway 1 assessment in September 2018. The process that Heathrow Airport adopted to develop the design principles for expansion included a lengthy engagement process with all of its major stakeholder groups and, given the far-reaching consequences of the airspace change proposal, included a period of public consultation.

Through that exercise Heathrow developed, tested and subsequently agreed a final list of design principles for expansion, five of which are considered to be mandatory (including safety, compliance with noise and air quality legislation, compliance with the Airports National Policy Statement and compliance with the CAA's Airspace Modernisation Strategy). The remaining design principles were then presented in a priority order, based on stakeholder feedback. Our mandatory design principles have been given equal weighting, with the exception of safety which will always be presented with the highest priority.

As noted above, amongst the mandatory design principles is design principle 5: "*Must meet commitments to the Government's airspace modernisation strategy*". Table 3 on page 16 of our Design Principles Submission document presents the design principles, the supporting rationale stakeholder feedback and the level of consensus on each principle. The supporting rationale for design principles 5 recognises that Heathrow Airport has committed to deliver airspace modernisation by 2030 and is working with NATS and other airports in the South of England to achieve this. The commentary states that Heathrow has taken the

decision to undertake airspace modernisation as part of the expansion programme. It was made clear throughout the engagement process that this is a mandatory requirement of the Expansion airspace change. The relevant except form the table is below:

<p>5.</p>	<p>Must meet commitments to the Government's airspace modernisation strategy.</p>	<p>Heathrow, along with all UK airports, has committed to deliver airspace modernisation by 2030 and is working with NATS and other airports in the south east to deliver to an agreed timeline. We have taken the logical decision to undertake airspace modernisation as part of the expansion programme since both programmes require substantial redesign of our airspace.</p>	<p>Industry stakeholders see modernisation as the key to unlocking many benefits, including to passengers and local communities. Some community stakeholders have concerns about concentration of aircraft on a route caused by PBN¹³.</p>	<p>Disagreement. Some stakeholders expressed concerns about airspace modernisation leading to concentration of aircraft on a route: this is a matter of government policy and beyond the scope of airspace design principles</p>
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When we submitted our design principles to the CAA, we were clear that an airspace design will not be implemented if it fails to achieve any of the five mandatory design principles, regardless of the order in which they are presented. As such, ranking them in any other order would not change this outcome. Consequently, we believe that the inclusion of design principle 5 in Heathrow's Expansion ACP meets the CAA's requirement for all FASI-South change sponsors to include a design principle reflecting the absolute need to accord with the CAA's Airspace Modernisation Strategy. Any change to the wording or ordering of the existing design principle, and subsequently re-engaging to this effect, will not have a material effect, except to cause confusion to our stakeholders.

We therefore propose to retain the wording and position of our existing design principle 5 relating to the CAA's Airspace Modernisation Strategy and ensure that we bring your request to the attention of our stakeholders at the next available opportunity. As such, we will document formally at Gateway 2 how we have already addressed your request in our existing design principles and that we have engaged with our stakeholders to this effect.

We would welcome your confirmation that our proposed approach is acceptable.

Yours sincerely,




Heathrow Expansion