

SLIGHTLY STEEPER APPROACHES CONSULTATION STRATEGY

FINAL



Heathrow



Heathrow Slightly Steeper Approaches – Consultation Strategy

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1. INTRODUCTION

1.1 Purpose of this document

- 1.1.1 The purpose of this document is to detail Heathrow's strategy to ensure an effective consultation on the Slightly Steeper Approaches (SSA) airspace change proposal (ACP). It outlines Heathrow's approach to the SSA consultation and how we intend to engage our stakeholders.
- 1.1.2 Heathrow aims to provide a fair, open and transparent consultation strategy for the Civil Aviation Authority (CAA), as required by CAP1616.¹
- 1.1.3 For a consultation to be effective, those who are consulted should be able to base their views on a reasonable understanding of the situation, clear information about what is proposed, the potential impact of the changes on them and be able to express their views and have confidence that their views will inform the final proposal².
- 1.1.4 In this document Heathrow sets out the engagement activity undertaken during Stages 1 and 2 of the CAP1616 process and outline our strategy for the Stage 3C consultation.
- 1.1.5 CAP1616 provides guidance on the areas which this consultation strategy must cover:³
- Audience – detailing which stakeholders are likely to be affected, both positively and negatively; information needs; considerations for any seldom-heard audiences;
 - Approach – detailing how audiences will be informed of the consultation (including those with no internet access) and what opportunities they will have to engage and respond; timetable of associated consultation activities;
 - Materials – how Heathrow intends to provide stakeholders with enough information to ensure they understand the issues and potential impacts, how the supporting materials will be developed to suit a range of audiences and the method for communicating technical information in an accessible way;
 - Length – start and end dates of the consultation, confirming its length;
 - Post-consultation – what will happen post-consultation and next steps.

1.2 Background on the Slightly Steeper Approaches airspace change proposal

What are Slightly Steeper Approaches?

- 1.1.1 Slightly steeper approaches involve aircraft flying a slightly steeper angle of descent on final approach. They have been shown to provide small noise benefits to communities living

¹ [CAP1616 Page 22 para 66](#)

² [CAP1616 page 176 para C2](#)

³ [CAP1616 Page 49 para 167](#)



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close to an airport. As such, Heathrow, working alongside local communities, has aspired to implement this procedure for aircraft conducting RNAV⁴ approaches.

1.1.2 The CAA has encouraged industry to consider the potential to use SSA, where appropriate, as a means of mitigating noise⁵. Heathrow's intent to explore the feasibility of SSA and is one of the initiative set out in 'Quieter Procedure' section in [Heathrow's Noise Action Plan 2019-2023](#). Between 2015 and 2017, Heathrow ran two live trials to investigate how SSA for arriving aircraft (3.2° as opposed to 3.0°) would impact Heathrow operationally whilst at the same time attempt to measure the benefit in noise reduction that could be achieved.

1.1.3 Since 2017 the CAA has approved continuation of this procedure until this airspace change process takes place and the slightly steeper approaches are still being flown today.

1.1.4 For operational reasons, which are explained fully in the trial reports⁶, these slightly steeper approaches can only be flown by aircraft using RNAV navigation technology⁷. Of all Heathrow approaches over the trial periods, fewer than 2% flew an RNAV SSA. The remainder flew the standard 3.0° approaches using the Instrument Landing System (ILS).

1.1.5 The main reasons for the lower number of 3.2° RNAV arrivals compared to 3.0° arrivals using our ILS are:

- ILS approaches have been the standard for over 50 years and crews are much more familiar with them compared to RNAV approaches, which are relatively new on a global level.

With Heathrow's large and diverse range of airline customers, many crews operate long-haul⁸ flights meaning that they may only fly into Heathrow once every few months and many will opt for the approach (ILS) with which they feel most comfortable. 69% of all the 3.2° RNAV approaches flown during the first trial were performed by the A320 family, a short to medium-haul aircraft.

- RNAV approaches are only available in CAT I⁹ conditions or better, meaning that during poorer visibility they cannot be used.
- Not all the aircraft using Heathrow have the capability to fly RNAV approaches.

1.3 Restarting a 'paused' Airspace Change Proposal

1.3.1 In October 2020 the CAA released a policy statement providing guidance to sponsors currently progressing through the CAP1616, which have been paused due to the COVID-19 pandemic¹⁰. The aim is to avoid requiring sponsors to repeat work previously conducted where possible.

⁴ [RNAV Definition](#)

⁵ Chapter 5 of [CAP 1165 Managing Aviation Noise](#)

⁶ [First trial](#) report and [Second trial](#) report

⁷ RNAV: aRea NAVigation – a Performance based Navigation (PBN) specification. RNAV approaches are now known as GNSS approaches or RNP Approaches but we will continue to refer to them as RNAV approaches for this ACP.

⁸ Flight duration in excess of 6 hours

⁹ [Categories of Precision Approach](#)

¹⁰ [CAA Policy Statement](#)



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- 1.3.2 For an ACP to restart, the CAA will need to understand whether there have been changes to a number of contextual considerations, including;
- any changes to the issue or opportunity in the Statement of Need, the operation environment or geographical area in which the ACP is being developed;
 - changes to law, government policy or CAA requirements that would affect the development of an ACP, or parts of an ACP;
 - changes to identified stakeholders.
- 1.3.3 If there have been no relevant changes in context, the sponsor should submit a short confirmation statement to the CAA before being invited to submit a new timeline for restarting the ACP.
- 1.3.4 At the time of the release of this policy Heathrow had already re-started the slightly steeper approaches airspace change proposal and submitted a new timeline, which had been agreed by the CAA.
- 1.3.5 To ensure policy is followed, Heathrow have liaised with the CAA stating that there are no relevant changes in context to this proposal and the CAA have confirmed that this airspace change can be un-paused.



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2. OBJECTIVES OF THE CONSULTATION

2.1 Vision

- 2.1.1 CAP1616 states that the aim of consultation is to allow stakeholders who may be affected by the proposal, both positively and negatively, to have an appropriate opportunity to comment on proposals based on a reasonable understanding of them¹¹.
- 2.1.2 Heathrow’s overarching vision for the SSA Stage 3 Consultation is to ensure a proportionate approach is taken, which provides impacted stakeholders equal opportunities to participate throughout the consultation process in a meaningful way.
- 2.1.3 Due to the nature of this airspace change proposal there is currently only one viable option for Heathrow to introduce slightly steeper approaches, which is for 3.2° RNAV approaches to be used in conjunction with 3.0° ILS approaches¹². It has been demonstrated that there are no environmental dis-benefits to SSA.
- 2.1.4 As there is only one viable option for Heathrow’s stakeholders to consider, there is little opportunity for stakeholders to influence the airspace *design* itself, which is at odds with the requirements laid out in CAP1616. CAP1616 lists many key consultation requirements, one of which is the categorisation of responses into “those that may lead to a change in the design and those that could not”¹³.
- 2.1.5 CAP1616 goes on to say that for consultation to be effective, consulted stakeholders should be able to have confidence that the views they present to the change sponsor will inform the final proposal.¹⁴ Therefore, we feel the only pertinent question for this consultation is whether our stakeholders support the proposal, as opposed to being able to influence aspects of the design.
- 2.1.6 If there is significant opposition in response to this consultation, then Heathrow will consider whether to discontinue slightly steeper approaches.

2.2 Objectives

- 2.2.1 It is recommended in CAP1616 that an airspace consultation is conducted in line with the consultation principles (known as the Gunning principles):
- consultation should occur when proposals are at a formative stage (i.e. when there is still design flexibility to react to feedback)
 - the consultation should give sufficient reasons for any proposal to permit intelligent consideration (i.e. there is sufficient information within the consultation that allows consultees to understand the basis of the proposals and how responses will be considered)

¹¹ [CAP1616 Page 49 para 165](#)

¹² [Stage 2 Initial Options Appraisal](#)

¹³ [CAP1616 page 47 para 154](#)

¹⁴ [CAP1616 Appendix C Page 176 para C2](#)



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- the consultation should allow adequate time for consideration and response (i.e. the consultation period should be long enough for consultees to have time to provide an informed response).
- the product of consultation must be conscientiously taken into account. (i.e. Heathrow must consider all responses when making its final decision)

2.2.2 Based on the Gunning Principles, Heathrow's objectives for effective consultation on its SSA airspace change are:

- An inclusive consultation that provides the opportunity for all impacted stakeholders to learn about slightly steeper approaches.
- To ensure that stakeholders are aware of how the procedure is currently in operation under a trial and although how little perceivable difference to the aircraft will be seen or heard on the ground; small, incremental improvements are necessary to help deliver holistic improvements in Heathrow's overall noise footprint.
- To ensure that all stakeholders are aware of the noise and environmental benefits of the procedure.
- To ensure that all stakeholders are aware that there is only one option for introducing the slightly steeper approaches on a permanent basis and why this is the case.
- To utilise the consultation methods required by CAP1616 and ensure that these methods are appropriate to different stakeholders and communities.
- To provide sufficient and comprehensive information at appropriate times, while being transparent and accessible.
- To understand if our stakeholders still support the proposal.



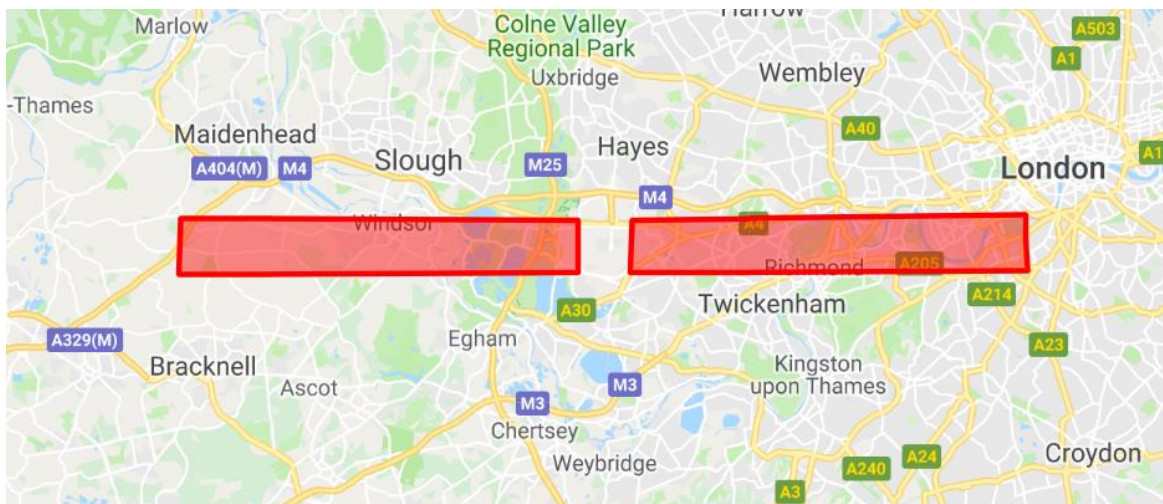
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3. SUMMARY OF ENGAGEMENT ACTIVITY UNDERTAKEN TO DATE

3.1 Stage 1 – Design Principles Engagement

Who did we engage with?

- 3.1.1 CAP1616 states that design principles are to be drawn up through discussion between the change sponsor and effected stakeholders. These will normally include elected community representatives, local community groups, the airport consultative committee and representatives of local General Aviation organisations or clubs.
- 3.1.2 Heathrow identified the affected stakeholders by assessing the potentially impacted area, based on the extent of the final approaches for Heathrow's runways, extended from the runway out to 10NM, because all of Heathrow's SSA RNAV approaches commence at 10NM from touchdown.



3.1.3

Figure 1: Map of potentially impacted areas

- 3.1.4 During Stage 1 Heathrow utilised existing forums to carry out the design principle engagement. Heathrow engaged with the Heathrow Community Noise Forum (HCNF), the Heathrow Community Engagement Board (HCEB) and the Heathrow Strategic Planning Group (HSPG), which represents many of the local authorities surrounding Heathrow.
- 3.1.5 For industry groups, Heathrow engaged with, the National Air Traffic Advisory Committee (NATMAC) and the Heathrow Airport Flight Operations Performance and Safety Committee (FLOPSC).

How did we engage?

- 3.1.6 As a considerable amount of work and engagement had taken place before and during the slightly steeper approaches trials, Heathrow felt a focussed approach to design principle engagement would be appropriate. Heathrow was also conscious of the significant amount of on-going engagement with stakeholders on other Heathrow projects e.g. Heathrow expansion and other airspace change proposals at that time and wanted to avoid 'consultation fatigue'.



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- 3.1.7 To ensure all stakeholders had a full understanding of the proposal, Heathrow prepared a briefing document outlining the background and history of slightly steeper approaches.
- 3.1.8 Stakeholders were presented with a list of proposed design principles, which were based on the engagement which took place prior to, and as a result of the live trials.
- 3.1.9 Stakeholders were then invited to tell Heathrow whether:
- They agree or disagree with any of the design principles proposed
 - They would like to make any amendments to the proposed design principles, and
 - There are any other design principles that they would like to suggest.
- 3.1.10 All identified stakeholders, the HCNF, HECB, HSPG, NATMAC, FLOPSC and local authorities within the impacted areas were emailed the briefing document. In addition, a verbal briefing was provided to the HCNF. All stakeholders were asked to provide feedback within two weeks.
- 3.1.11 A full record of the Stage 1 stakeholder engagement is available in the design principle submission documents on the CAA Portal¹⁵.

Summary of Stage 1 Stakeholder Engagement

- 3.1.12 The feedback Heathrow received from industry and community stakeholders showed support for slightly steeper approaches.
- 3.1.13 During the engagement, stakeholders questioned the need for any engagement on this airspace change proposal to take place, as the procedure was already being flown by aircraft at Heathrow and there were no negative impacts from this proposal. Stakeholders were informed by the CAA that for Heathrow to permanently adopt slightly steeper approaches the CAP1616 process for a permanent airspace change must be followed.
- 3.1.14 Following stakeholder engagement and internal analysis Heathrow's design principles for slightly steeper approaches were submitted to the CAA on 9th August 2019 and they are:

| Final Design Principles | |
|-------------------------|--|
| 1 | Must be safe |
| 2 | Must achieve the objective of reducing noise compared to a 3.0° approach |
| 3 | Must not increase the numbers of go-arounds |
| 4 | Must not reduce Heathrow's capacity |
| 5 | Must not change the lateral tracks of aircraft over the ground |
| 6 | Should not reduce the ability of arrivals to perform Continuous Descent Approach |
| 7 | Should maximise the number of aircraft able to fly the slightly steeper approach |

¹⁵ [Slightly Steeper Approaches Design Principle Submission](#)



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| | |
|---|---|
| 8 | Should not adversely increase pilot or ATC workload |
|---|---|

Table 1: Final list of design principles for slightly steeper approaches

3.1.15 Heathrow passed the Stage 1 Gateway on 27th August 2019.

3.2 Stage 2 – Develop & Assess

Who did we engage with?

3.2.1 For Stage 2 of CAP1616 Heathrow engaged with the same stakeholders as Stage 1. Due to the nature of the airspace change and as it is a procedure currently in place under a trial, Heathrow decided to engage with our community stakeholders via face-to-face briefings, to ensure they fully understood the situation.

3.2.2 Heathrow engaged with industry stakeholders, NATMAC and FLOPSC via email.

How we reacted to Stakeholder feedback

3.2.3 During this phase of engagement Heathrow received no written feedback from the community groups engaged. During the HSPG and HCEB meetings there was, again, questioning from some stakeholders as to the need for an airspace change proposal on such a small change, with no negative environmental impact.

3.2.4 Following the Stage 2 design principle evaluation¹⁶ it was established that the only viable option at this time for Heathrow, other than doing nothing and revert the RNAV procedure to 3 degrees again, is to introduce permanent 3.2° RNAV approaches to be used in conjunction with 3.0° ILS approaches.

3.2.5 Heathrow passed the Stage 2 Develop and Assess Gateway on the 27th February 2020.

¹⁶ [Stage 2A](#) and [2B](#) submission document.



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4. AUDIENCE

Identifying the audience

- 4.1.1 Due to the nature of slightly steeper approaches Heathrow have been able to clearly define the geographic area of potentially impacted communities (see Figure 2).
- 4.1.2 Additional impacted stakeholders, such as airlines have also been identified and engaged with during Stage 1 and Stage 2 using the existing forums NATMAC and FLOPSC.
- 4.1.3 For the Stage 3 consultation Heathrow will carry out an on-line consultation. This would be the case even without the presence of COVID-19 restrictions, owing the relatively benign nature of the change. Previously engaged stakeholders will be directly contacted via email to be given details on the consultation. These stakeholders are:

National Air Traffic Management Committee (NATMAC)

| List of NATMAC Members | |
|---|--|
| Airlines UK | Airspace4All |
| Airport Operators Association (AOA) | Airfield Operators Group (AOG) |
| Aircraft Owners & Pilots Association (AOPA) | Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK) |
| British Airways (BA) | Bae Systems |
| British Airline Pilots Association (BALPA) | British Balloon & Airship Club (BBAC) |
| British Business & General Aviation Association (BBGA) | British Gliding Association (BGA) |
| British Helicopter Association (BHA) | British Hang Gliding & Paragliding Association (BHPA) |
| British Microlight Aircraft Association (BMAA) | British Model Flying Association (BMFA) |
| British Parachute Association (BPA) | General Aviation Alliance (GAA) |
| General Aviation Safety Council (GASCo) | Guild of Air Traffic Control Officers (GATCO) |
| Honourable Company of Air Pilots (HCAP) | Helicopter Club of Great Britain (HCGB) |
| Heavy Airlines | Isle of Man CC |
| Light Aircraft Association (LAA) | Low-Fares Airlines |
| NATS | PPL/IR (Europe) |
| UK Airprox Board (UKAB) | UK Flight Safety Committee (UKFSC) |
| Ministry of Defence – Defence Airspace & Air Traffic Management (MoD DAATM) | United States Air Force Europe (USAFE) |



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| | |
|---------------------------|-----------------------------------|
| Navy Command Headquarters | Military Aviation Authority (MAA) |
|---------------------------|-----------------------------------|

Table 2: List of NAMTAC members

Heathrow Airport Flight Operations Performance and Safety Committee (FLOPSC)

| List of FLOPSC Members | |
|---|--------------------------------|
| Heathrow | National Air Traffic Services |
| British Airways | Virgin |
| Flybe | United |
| Qatar Airways | Lufthansa (DLH) |
| KLM | Aer Lingus |
| American Airlines | Germanwings |
| Austrian Airlines | Delta |
| SAS | Qantas |
| Met Office | Airport Coordination Ltd (ACL) |
| British Air Line Pilots Association (BALPA) | Civil Aviation Authority |
| Department for Transport | UK Flight Safety Committee |

Table 3: List of FLOPSC members

Heathrow Community Noise Forum (HCNF)

| Borough | Councillor/Officer | Community Representative |
|-----------------------------|--------------------------|---|
| Bracknell Forest | [REDACTED] | [REDACTED] LAANC |
| Buckinghamshire CC | [REDACTED] | [REDACTED] |
| Elmbridge | [REDACTED] | [REDACTED] |
| Hillingdon | [REDACTED] | [REDACTED] HASRA [REDACTED] |
| Hounslow | [REDACTED] | [REDACTED] |
| London Borough of Ealing | [REDACTED] | [REDACTED] EANAG |
| Hammersmith & Fulham | [REDACTED] | [REDACTED] |
| London Borough of Lewisham | [REDACTED] | [REDACTED] Forest Hill Society |
| London Borough of Southwark | [REDACTED] | [REDACTED] Plane Hell |
| Richmond | [REDACTED] | [REDACTED] Richmond Heathrow Campaign (RHC) [REDACTED] RHC [REDACTED] Teddington Action Group (TAG) [REDACTED] TAG |
| Runnymede | [REDACTED] [REDACTED] | [REDACTED] Englefield Green [REDACTED] Englefield Green Action Group (EGAG) |



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| | | |
|-----------------------|--------------------------|--|
| | | ██████████ EGAG ██████████ EGAG |
| South Bucks | ██████████ | ██████████ Richings Park Residents Association |
| Spelthorne | ██████████ ██████████ | ██████████ Spelthorne resident |
| Surrey Heath | ██████████ ██████████ | ██████████ Aircraft Noise 3 Villages (AN3V) ██████████ AN3V ██████████ AN3V ██████████ The Windlesham Society |
| Surrey County Council | ██████████ | |
| Slough | ██████████ | |
| Windsor & Maidenhead | ██████████ | |
| Wokingham | ██████████ | |
| Other | | ██████████ HACAN |

| Industry | | |
|----------------------------|--|--------------------------|
| To70 (Independent Advisor) | Anderson Acoustics | British Airways |
| Virgin Atlantic | Civil Aviation Authority | Department for Transport |
| NATS | Independent Commission on Civil Aviation Noise (ICCAN) | Heathrow |

Table 4: List of HCNF Members

Heathrow Community Engagement Board (HCEB)

| List of HCEB Members | |
|---|------------|
| Chair | ██████████ |
| Director | ██████████ |
| Director | ██████████ |
| Non-Exec Board Member | ██████████ |
| Non-Exec Board Member & Chair of Passenger Services Group | ██████████ |
| Residents Adviser | ██████████ |
| Executive Assistant | ██████████ |
| Head of Communications & Strategy | ██████████ |

Table 5: List of HCEB Members

Heathrow Strategic Planning Group (HSPG)

| List of HSPG Members | |
|--------------------------------|---------------------------|
| Buckinghamshire County Council | Runnymede Borough Council |



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| | |
|--|--|
| Colne Valley Park Community Interest Company | Slough Borough Council |
| Elmbridge Borough Council | Surrey County Council |
| Enterprise M3 Local Enterprise Partnership | South Bucks District Council |
| London Borough of Ealing | Spelthorne Borough Council |
| London Borough of Hounslow | Thames Valley Berkshire Local Enterprise Partnership |
| Royal Borough of Windsor & Maidenhead | Buckinghamshire Thames Valley Local Enterprise Partnership |

Table 6: List of HSPG members¹⁷

Local Authorities

4.1.4 The following local authorities are within/partially within the geographical area used to identify impacted stakeholders.

| | |
|----------------------|----------------------|
| Windsor & Maidenhead | Slough |
| Hillingdon | Hounslow |
| Bracknell Forest | Spelthorne |
| Richmond upon Thames | Hammersmith & Fulham |
| Kensington & Chelsea | Wandsworth |

Table 7: List of Local Authorities

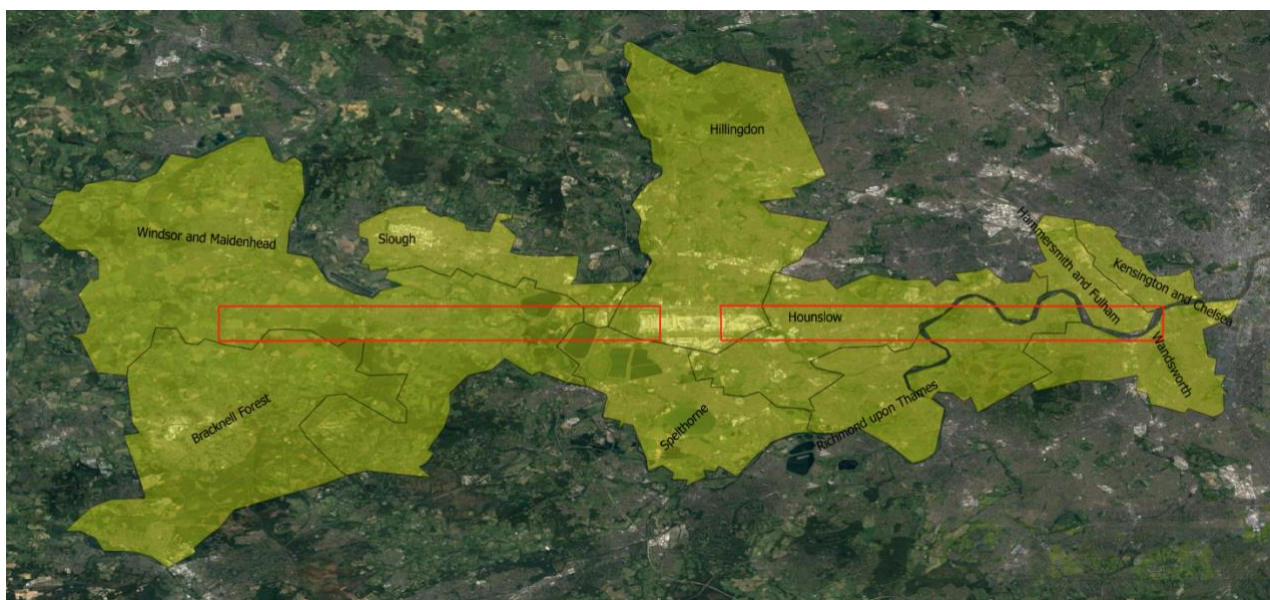


Figure 2: Map of Local Authorities

¹⁷ Information taken from [Heathrow Strategic Planning Group](#)



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Wider Public

- 4.1.5 Although Heathrow intends to promote the consultation to the specific stakeholders listed above, the SSA consultation will be open to the public.

Impacts of slightly steeper approaches on stakeholders

- 4.1.6 Slightly steeper approaches have been shown to provide noise benefits to communities living close to an airport. Communities local to Heathrow Airport supported the trials carried out in 2015 and 2017, which demonstrated that a small noise benefit (an average decrease of 0.5dBA) can be provided, whilst causing no negative environmental or operational dis-benefits.
- 4.1.7 Slightly steeper approaches do not involve any changes to the track length or lateral flight paths of aircraft arriving at Heathrow, nor will it involve any increase in the number of air traffic movements. Aircraft carrying out slightly steeper approaches will fly slightly higher for longer on arrival to the airport, which is marginally beneficial in respect of air quality, greenhouse gas (carbon emissions), and fuel burn. However, due to the small percentage of aircraft that operate SSA (0.6% in 2019), the overall benefits are marginal. Therefore, impacts of slightly steeper approaches on air quality, greenhouse gas (CO₂) and fuel burn is considered negligible.¹⁸

4.2 Information needs of stakeholders

- 4.2.1 Heathrow's aim is to ensure a proportionate approach to consultation for this ACP is taken, which provides impacted stakeholders equal opportunities to participate throughout the consultation process in a meaningful way.
- 4.2.2 Heathrow recognises that this is a technical airspace change proposal and has made efforts throughout the trial periods and Stage 1 and Stage 2 of the ACP to ensure all stakeholders understand the procedure which is being described (see section 1.1.2 of this document).
- 4.2.3 During and after the trial period, our community stakeholders were given briefings on the trial and the results and all documentation was made available in the briefing document, which was distributed at the beginning of the design principle engagement¹⁹.
- 4.2.4 Heathrow believes that the stakeholders who are interested in and who will respond to this consultation have a solid base knowledge of slightly steeper approaches. However, all the background information will be provided via links from the main consultation document.
- 4.2.5 Heathrow believes that the information needs of stakeholders will be covered by the documents it intends to provide and no public or online events are necessary to supplement the online consultation, but there will be a dedicated email address (airspace@heathrow.com) to answer any requests for clarification throughout the consultation period.

¹⁸ SSA Full Options Appraisal Document

¹⁹ [Appendix B - SSA Design Principle Submission](#)



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4.3 *Seldom-heard audiences*

- 4.3.1 CAP1616 states that the consultation strategy must cover “who may be affected, positively or negatively, by the change (audience map) and what their information needs are (including consideration of any seldom-heard audiences)²⁰.”
- 4.3.2 This airspace change proposal is non-typical, as it is a procedure that is already in place at Heathrow Airport and one which presents no negative impact on local communities. Therefore, as stated in paragraphs 4.1.1- 4.1.3 Heathrow intends to only directly contact those stakeholders previously engaged on this airspace change proposal, however the consultation will be open to the wider public if they wish to participate.

4.4 *Impact of COVID-19*

- 4.4.1 The coronavirus, COVID-19 pandemic has had dramatic impacts around the world, including the aviation industry. Throughout the pandemic, Heathrow has prioritised safety of colleagues, passengers and stakeholders.
- 4.4.2 Prior to the pandemic this consultation was planned to take place entirely on-line with no public events taking place, owing to the benign nature of the change. Although the consultation has been delayed due to the pandemic, the strategy remains the same.

²⁰ [CAP1616 page 49 para 167](#)



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5. APPROACH

5.1 Consultation Plan

- 5.1.1 Due to the benign nature of this airspace change proposal and the situation with the COVID-19 pandemic Heathrow proposes to carry out a fully online consultation. However, to ensure those with no internet access are still able to respond to the consultation, Heathrow will carry out the actions in paragraphs 5.3.1-5.3.3.
- 5.1.2 Heathrow does not intend to hold any in-person consultation events.

5.2 Slightly Steeper Approaches Stakeholder Identification & Consultees

The stakeholder identification process

- 5.2.1 The stakeholder identification process was conducted geographically at the start of the airspace change process and resulted in the list of stakeholders identified in section 4.

Consultees

- 5.2.2 The targeted consultees for this consultation are listed in section 4 of this document. The wider public will also be encouraged to respond to the consultation if they wish to.

5.3 Notification of Consultees

Letters/Emails

- 5.3.1 A letter via email notifying the Local Authorities within the impacted area (Figure 2) about the consultation will be issued before the start of the consultation. This will provide recipients with the dates of consultation, details of where more information can be found and how feedback can be provided.
- 5.3.2 At the start of the consultation process all the targeted stakeholders listed in section 4 will be sent a letter via email informing them of the consultation. The letter/email will provide an overview of the consultation and details of the on-line consultation and how feedback could be provided.
- 5.3.3 The letter/email will also inform stakeholders how to request hard copies of the consultation material and how to provide feedback, if they are unable to do so on-line.

Social Media

- 5.3.4 Heathrow will advertise the consultation using its existing social media platforms. Interested stakeholders will be directed to the consultation website.



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5.4 Method of Consultation

Online portal (Citizen Space)

- 5.4.1 The CAA requires the use of the online portal (Citizen Space) as the platform for the Stage 3 consultation.
- 5.4.2 All the consultation material will be uploaded to Citizen Space including the feedback form. All the consultation responses will be collected, analysed and published on Citizen Space.
- 5.4.3 Heathrow intends to have tiered consultation documents, outlined in table 8, with a feedback form containing the consultation question for stakeholders. It will also contain a free-writing section for ‘Any further feedback on this airspace change proposal’.
- 5.4.4 A ‘Frequently Asked Questions’ page will also be developed as the consultation progresses and this will be uploaded and updated throughout the consultation period. More details are in section 6.1 of this document.
- 5.4.5 Previous documents, for example the Stage 1 and Stage 2 submissions will be available to stakeholders via hyperlinks directing them to the relevant page on the CAA portal.
- 5.4.6 Consultation responses should be submitted through Citizen Space. If Heathrow receives written responses via the post, they will be transcribed by Heathrow and uploaded onto the website.
- 5.4.7 Where possible, responses received from stakeholders will be categorised as per CAP1616 Appendix Table C2²¹.

5.5 Ongoing channels of communication during consultation

- 5.5.1 To ensure the consultation will be inclusive and accessible, additional communication channels will be utilised to allow consultees to access project information. These will include the channels set out below.

Heathrow Website

- 5.5.2 Heathrow will have a short paragraph on its website informing stakeholders of the consultation and with a link to the consultation Citizen Space webpage on the CAA Portal. This will remain in place for the duration of the consultation period.
- 5.5.3 Stakeholders will not be able to provide responses to the consultation via the Heathrow website but will be directed to the Citizen Space consultation website if they wish to respond.
- 5.5.4 Hard copies of documents and the feedback form can be requested via the consultation phoneline, the information email address or in writing to:

SSA Airspace Change Consultation
The Compass Centre
Nelson Road
Hounslow
TW6 2GW

²¹ [CAP1616 Appendix C Page 185 Table C2](#)



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- 5.5.5 Further electronic copies can also be requested by the wider public by emailing airspace@heathrow.com if required.

Phoneline

- 5.5.6 If members of the public have any questions about the consultation, they will be able to call the Heathrow Community Helpdesk (0800 344 844) to discuss any questions they have about the SSA consultation process or how access to information. They will not be able to provide a response to the consultation via the phone line and will instead be directed to the Citizen Space website, or, if they are unable to access the website, to provide a written response via a hardcopy form.

Information email address

- 5.5.7 The email address airspace@heathrow.com will be monitored throughout the consultation. This will operate alongside the consultation phoneline and will be available for consultees to request further information or ask questions in relation to the proposals.
- 5.5.8 Consultees will not be able to use the email address to respond to the consultation and will instead be directed to the online portal, or hardcopy form.
- 5.5.9 Heathrow will provide a postal address (see para 5.5.4) for hand-written responses to be returned to and a deadline for any written response will be advertised.

Public exhibitions

- 5.5.10 There are no planned public exhibitions.

Document inspection locations

- 5.5.11 Due to COVID-19 there will be no document inspection locations. However, copies of the consultation documents will be emailed to the targeted stakeholder list in section 4, along with a link to the website and how to respond.
- 5.5.12 If any consultees are unable to respond on Citizen Space, hard copies of the feedback from can be provide on request and Heathrow will provide a postal address (see para 5.5.4) for hand-written responses to be returned to and a deadline for any written response will be advertised.

5.6 Advertising and Publicity

Advertisements/Press Releases

- 5.6.1 There are no planned press releases or advertisement campaigns.

Social media

- 5.6.2 When the consultation launches Heathrow will promote the consultation through its existing social media channels using Facebook and Twitter.



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- 5.6.3 Heathrow will ensure that stakeholders are aware that responding to any social media posts would not be counted as a formal consultation response.

5.7 Contingency planning

- 5.7.1 Heathrow is proposing a short period of consultation for slightly steeper approaches and will therefore aim to deconflict from other events in the political calendar as well as holiday periods. In the event of an unforeseen disruption, (for example, tighter COVID-19 restrictions) that may impact on Heathrow staff and the ability to reply to consultation questions, to enable timely consultation responses, we will extend the consultation period. In this circumstance we will contact all our SSA stakeholders and advise them of the consultation period extension.
- 5.7.2 Responses will be regularly checked by Heathrow staff as they are uploaded onto the portal, and as the consultation period is short (4 weeks) Heathrow will not carry out an official mid-way check.

5.8 How we will encourage responses

- 5.8.1 Heathrow will encourage responses from stakeholders by promoting the consultation in all on-going stakeholder engagement sessions leading up to the consultation period. Letters will be sent out to local authorities within the impacted area. Heathrow hold regular community and local stakeholder meetings who will be informed ahead of the start date of the consultation.
- 5.8.2 Heathrow will use social media to promote the consultation, with reminder posts being made mid-way through the consultation period.

5.9 Independent Commission on Civil Aviation Noise (ICCAN)

- 5.9.1 In 2018, the Government set up ICCAN²². ICCAN is the independent UK body responsible for creating, compiling and disseminating best practice to the aviation industry on the management of civil aviation noise and advising government in this area. Within the context of the airspace change process, ICCAN's role is to:
- Provide best practice on the best noise management techniques
 - Provide best practice on the accessibility of noise information.
- 5.9.2 The CAA expects change sponsors to be mindful of ICCAN's role and best practice throughout the process, and to factor it into a proposal where relevant.

ICCAN Toolkit for consultation on airspace change

- 5.9.3 In July 2020, ICCAN released a toolkit²³ to help airspace change sponsors plan for public consultations and was devised to complement CAP1616 guidance. Similarly, to CAP1616 the toolkit looks at;

²² [ICCAN](#)

²³ [ICCAN Consultation Toolkit](#)



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- Audience
- Approach
- Materials
- Length.

5.9.4 Heathrow intends to study the methods presented in the toolkit and, where appropriate utilise them for this consultation.



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6. MATERIALS

6.1 Consultation Material

6.1.1 Heathrow intends to have tiered consultation material for consultees to view.

| Tier | Document | Content |
|------|----------------------------|---|
| 1 | Overview/Summary Document | 2-page, aimed to be a quick read and easy to understand document with diagrams. |
| 2 | Main Consultation Document | Summary of the ACP so far, including links to documents on the portal. Describing the slightly steeper approaches procedure in more detail and how Heathrow have reached the final option they are requesting to implement. |
| 3 | Full Options Appraisal | A link to the FOA submission, for consultees who wish to read the technical data. |

Table 8: Tiered Consultation Documents

6.1.2 A 'Frequently Asked Questions' page will be developed for stakeholders, containing questions that arise during the consultation and this will be updated during the consultation period as consultees respond.

6.1.3 A feedback form will also be included, as detailed in paragraph 6.2.2-6.2.3.

6.2 Online Consultation

Online Portal (Citizen Space)

6.2.1 The online portal (Citizen Space) will be utilised as stated in section 5.4. The online portal will host all the information outlined in paragraphs 6.1.1-6.1.3

Feedback form

6.2.2 A feedback form will be available on the website for anyone wishing to respond to this consultation. The feedback form will contain one consultation question:

- Do you support the permanent adoption of Slightly Steeper Approaches at Heathrow Airport?

6.2.3 It will also contain a free-writing section for 'Any further feedback on this airspace change proposal'.

6.2.4 Consultees will be required to respond to the consultation via an online form using the online portal. Any written responses will be manually uploaded onto Citizen Space. Further details on how consultees can respond in writing will be included on the consultation leaflets/letters/emails.



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7. CONSULTATION LENGTH

- 7.1.1 Heathrow proposes a shorter than standard 4-week consultation on slightly steeper approaches. This is entirely due to the benign nature of the slightly steeper approaches airspace change proposal; because the proposal is already in place as a procedure and has been for several years, has not been considered controversial in prior engagements and trials, and has been demonstrated to only have positive impacts. Since the trial procedure was first introduced in 2015, Heathrow have received no complaints related to SSA.
- 7.1.2 Due to the limited impact of the slightly steeper approaches airspace change proposal, and the support seen from our stakeholders already, Heathrow propose to hold a short and targeted 4-week online consultation only. Heathrow feel that a 4-week consultation is appropriate for this airspace change proposal given the extent of engagement on this to date, and the feedback received questioning the need for any consultation.
- 7.1.3 This is a shorter period than suggested in CAP1616, however, Heathrow believes that due to the limited impact of this airspace change proposal, combined with support and the size of the potentially impacted area, 4 weeks is a sufficient period to allow interested stakeholders to respond.
- 7.1.4 The consultation will run from the Friday 5th March – Friday 2nd April 2021.



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8. POST-CONSULTATION

8.1 Review and categorisation of responses

- 8.1.1 Following the close of the Stage 3 Consultation, Heathrow will collate, review and, where possible, categorise consultation responses. This exercise will show how the responses have been received and how the comments have been interpreted by Heathrow.
- 8.1.2 The report will be published on the CAA Portal.

8.2 Next steps in the CAP1616 process

Stage 4: Update and Submit

- 8.2.1 Following the consultation and a review of the responses Heathrow will prepare the final documentation and records of engagement for submission to the CAA.
- 8.2.2 Once finalised, the full ACP will be submitted to the CAA together with the consultation feedback report. We currently expect this to be May 2021.