

APPENDIX 7 – EVOLUTION OF OUR DESIGN PRINCIPLES

Historic Engagement and Public Consultation

- 1.1.1 Our airspace design principles have evolved throughout this process. Historic engagement enabled us to understand the key strategic policy objectives that the principles would need to set out, and these options and trade-offs were addressed directly at the consultation. Legal and regulatory considerations did not require consultation since these are requirements that Heathrow will have to deliver against, and to seek feedback on these would have been against the principles of fair consultation¹.

Additional Industry and Community Engagement

- 1.1.2 Following consultation, and based on consultation feedback, we identified and prioritised a list of 9 draft design principles. The list included 10 sub-principles relating to noise, which we prioritised to show specifically how we propose to mitigate the noise impacts of our airspace change. We shared this list with key stakeholders by email and discussed the prioritisation at community and industry stakeholder forums. We asked stakeholders for feedback on whether principles were missing from this list and whether the prioritisation was appropriate.
- 1.1.3 Appendix 9 contains the slide pack of draft, prioritised, principles shared with stakeholders, and the list of stakeholders it was shared with.

Community Focus Groups

- 1.1.4 We set up community focus groups to test our consultation findings on a new set of stakeholders (local residents who had not previously engaged with Heathrow).

Key revisions to the draft Design Principles

- 1.1.5 We revised our draft design principles based on the feedback from the stakeholder focus groups and from feedback provided as part of the stakeholder engagement on these draft principles. This enabled us to develop a final set of airspace design principles for expansion.
- 1.1.6 Two of the design principle options included in the draft list of design principles have not been included in our final list of design principles. This is based on feedback from the stakeholder focus groups and from the further engagement undertaken by sharing the draft list. The rationale for excluding these is set out below:

- h. Prioritise routing flight paths over rural areas (rather than over urban areas)

¹ One of the Gunning Principles is that “the product of consultation must be conscientiously taken into account” and it would not be possible to take account of feedback on legal and regulatory requirements that we will need to meet to obtain the necessary approvals for our airspace change and expansion programmes

Consultation feedback showed a general preference for overflying rural areas, but most of this feedback came from residents of urban areas. These principles generated significant debate at the Stakeholder Focus Groups with no clear consensus. We have therefore decided not to take explicit regard of this criteria and instead defer to the other noise principles a-h. The inclusion of “minimise total overflown” as a higher principle in this list (principle f) is likely to meet most stakeholders’ objectives of routing flight paths over areas of lower population, where we have a choice.

- j. Prioritise flight paths that reduce aircraft noise for local communities vs. flight paths that reduce fuel burn and emissions

Stakeholders (particularly those providing feedback to the consultation) showed a general preference for flight paths that reduce noise, and we have therefore prioritised noise above CO₂ by ordering principle 6 (“Should minimise local noise effects from flights”) above principle 7 (“Minimise fuel/CO₂/greenhouse gases”). This is also consistent with Government guidance. The position of these two principles means that principle j was not needed.

- 1.1.7 One new principle was added following further stakeholder feedback: “Heathrow must meet commitments to the UK’s Future Airspace Strategy”. This was added based on feedback that the aviation industry would like this commitment to be explicitly stated in our design principles to give the industry confidence that we will play our part in delivering this major UK programme.
- 1.1.8 Noise sub-principle h was amended following stakeholder feedback on the importance of protecting AONBs². Avoiding overflight of AONBs and National Parks, where possible, is also referred to in Government policy³. We have therefore amended the design principle to “Prioritise routing flight paths over parks and open spaces (rather than over residential areas), but avoid overflight of AONBs”.
- 1.1.9 A principle to design for resilience was added to the existing principle on operational efficiency, following airline feedback. This principle is now to “Ensure operational efficiency and resilience to maximise benefits to all stakeholders”.
- 1.1.10 A number of community members made objections to “minimise new” being positioned as higher priority than “share noise” in the design principles list. Further consideration was taken on the relative position of these two principles, and this order remains the only practical solution to meeting both principles. If we were to prioritise “maximise sharing” over “minimise new”, we would seek to spread flight paths as widely as possible. It would not then be realistically feasible to “minimise new” and we would be unable to deliver against this equally important principle. Both principles are therefore included as high priority noise principles, and we will be seeking to develop flight path options that both minimise the number of people newly overflown and share noise by offering predicable respite.

² Areas of Outstanding Natural Beauty

³ Air Navigation Guidance, 2017