

CAA Consultation Assessment

Airspace	Change Proposal Title	Heathrow Slightly Steeper Approaches	
Airspace Change Proposal Reference		ACP-2017-49	
Change Sponsor		Heathrow Airport	
Instruction	s		
YES •	ng a response/RAG status for each question, please e	ensure that one of the following options is used:	
	 Consultation Assessment 		
A.1	Audience		
A.1.1	Did the consultation target the right audience?		YES
	The change sponsor was able to clearly define the geo on the extent of the final approaches for Heathrow's rur geographical area the same set of aviation and non-avi and asked to respond to the consultation.	nways, extended from the runway threshold out to 10	NM. Within this
	Appendix B of the 'Consultation Response Document' I targeted for the consultation:	ists the stakeholders that were drawn from the existin	ng forums and
	Operators, NATS, DfT	mittee (FLOPSC) that includes representatives of He	
	representatives around Heathrow	t includes representatives from Local Authorities and	-
	 Heathrow Community Engagement Board (HCEB) that replaced Heathrow Airport Consultative Committee (HACC) Heathrow Strategic Planning Group (HSPG) 		
	Local Councils & AuthoritiesNATMAC Members		
	Following the approval of the Consultation Strategy and	d prior to the start of the consultation, the change spo	onsor added two

	further stakeholder groups to the targeted 19 pandemic) and Heathrow's Local Focu Organisations, including resident associat	s Forum – a community	forum attended by repres	
	Whilst the consultation was targeted at sta facing Citizen Space platform and so all st sponsor stated that the public were welco	akeholders had the opp		
A.1.2	Please provide a summary of responses b	below		
	change sponsor by email – from MOD and			
	 stakeholder had already responded via the uploaded to the Citizen Space portal. No response of the 132 responses, 77 (58%) were within the impacted area. 21 respondents were aviation stakeholders such as airline representatives. The following table shows how stakeholder together with the number of responses responses	received from individua (15%) selected that the s, ANSP, and MOD. No	d via post. Is and organisations who r y were representing an org consultation responses w ss whether they supported	epresent communities ganisation, 9 of which ere received from GA
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	Respondents who answere change proposal. Out of 12 consideration or feedback of	e proposal, and all 12 provided feedback. ed that they supported SSA were asked if they had any further feedback 20 responses, 53 (44%) provided feedback in support of SSA and further outside of this ACP's scope.	
	Responses were received t Stakeholder type	from a mix of stakeholders as shown in the table below: Number of responses	
	FLOPSC	5 responses from airlines and 1 from Heathrow ATC (NATS)	-
	HCNF	4 (2 of which did not support SSA)	-
	НСЕВ	0	
	HSPG	1	1
	NATMAC members	3 (NERL, MOD and UK Flight Safety Committee)	
	Local authorities (within the impacted ar	2 responses from LAs, ea)2 responses from County Councils, and 1 response from the Local Authorities' Aircraft Noise Council (LAANC)	
	Other organisations	(1 out of 5 responses did not support SSA) 2 (Hounslow Borough Respiratory Support Group and Heathrow	-
		Special Needs Centre)	
	Individuals Total	111 132 responses	
A.2	Approach		
A.2.1	Did the change sponsor co	nsult stakeholders in a suitable way?	YES
	The change sponsor condu- 1616 requirements.	cted their consultation using Citizen Space and consequently their approa	ch was aligned with CAP
	Due to nature of this proposal and the Covid-19 pandemic, the change sponsor carried out a fully online consultation. Stakeholders without internet access were given the option to request hard copies of consultation materials and the feedback form (to submit a postal response) via the phone helpline or the information email address.		
	Given the responses received during the consultation, it is reasonable to conclude that hosting the consultation solely online did not in any way undermine or affect the validity of the consultation exercise.		
A.2.2	What steps did the change	sponsor take to encourage stakeholders to engage in the consultation?	
	The following steps were ta	aken to encourage stakeholders to engage in consultations:	
	sultation Assessment	Page 3 of 13 CA	P 1616: Airspace Change

CAA Consultation Assessment

 Targeted stakeholders were sent a launch email on 4th March 2021. The email included a brief background to the ACP, provided the opening and closing dates of the consultation and signposted stakeholders to the consultation documents and response form available on the airspace change portal.
 A reminder email was sent to all stakeholders on 24th March 2021 (1.5 weeks before closing date) advising them that the consultation was scheduled to conclude on 2 April 2021 at 09:00 and asking stakeholders to provide feedback.
 The consultation was promoted on the Heathrow website and milestone posts such as launch and mid-way reminder were published on the sponsor's social media accounts (Twitter, LinkedIn and Facebook pages) directing interested stakeholders to the Heathrow website and subsequently to the Citizen Space online portal.
 A phone helpline and information email address were provided for stakeholders to request hard copies of the consultation documents or ask further questions in relation to the proposal and the consultation process. There was one request for consultation material to be sent out via the post. No enquiries were received via the phone helpline, but there were some emails requesting further information/clarification about SSA.
 Those stakeholders without internet access were able to submit postal responses.
 Throughout the consultation period, where themes were developing based on consultees' responses, the change sponsor was updating a 'Frequently Asked Questions' document.
Evidence has been provided by the change sponsor to support the steps set out above.
No public events were planned and therefore did not take place, and within the consultation strategy, the change sponsor stated that they would promote the consultation in all on-going stakeholder engagement sessions as well as at Heathrow's regular community and local stakeholder meetings leading up to the consultation period. The only meeting that took place before and during the consultation period was HCNF held on 27 January 2021 where an update on SSA was provided.
Was the change sponsor required to respond to any unexpected events and/or challenges? YES
After the consultation closed and during the analysis of responses, the change sponsor discovered that NATMAC, one of the organisations within the targeted audience, had been missed from the engagement emails. The sponsor contacted the CAA for guidance, and it was determined that the sponsor would reach out to the key stakeholders within NATMAC to get their responses, if they had not already responded to the consultation. NATS and MOD were categorised by the change sponsor as the key NATMAC stakeholders for this ACP.
NATS had already responded, and MOD was contacted by the sponsor and provided with the consultation documents. The
tation Assessment Page 4 of 13 CAP 1616: Airspace Change

	MOD provided a response in an email which was manually uploaded to the Citizen Space. MOD was in support of SSA, as it would not have detrimental impact on MOD operations.		
	Apart from the NATMAC issue, the sponsor did not encounter any other challenges or unexpected events as part of the engagement and consultation.		
A.3	Materials		
A.3.1	What materials were used by the change sponsor during the consultation?		
	The sponsor utilised the Citizen Space platform to create a related consultation page and to invite stakeholders to submit their feedback using the feedback form provided.		
	Materials used during the consultation comprised the following:		
	 Overview/Summary Document – a non-technical, easy to understand 2-page quick explanation of the airspace change proposal with diagrams. 		
	 Consultation Document – main document that included explanations of how aircraft land at Heathrow, described the SSA procedure in more detail, options previously considered and how the sponsor arrived at the final option they were proposing to implement. The document also outlined benefits and impacts of the final option and how to respond to the consultation. 		
	 Feedback form – included only one question and asked stakeholders whether they supported the permanent adoption of slightly steeper approaches at Heathrow airport. Respondents who answered that they did not support SSA were given an opportunity to provide their rationale/feedback as to why they did not support the proposal, and respondents who answered that they supported SSA were asked if they had any further feedback about this airspace change proposal. 		
	 FAQ document – had some initial questions (6) the sponsor felt might be useful for respondents, and consequently was updated twice during the period of consultation. 		
	 Full Options Appraisal – included a detailed technical and environmental analysis of SSA, a summary of which was also included in the main Consultation Document. 		
	Additionally, the change sponsor provided several links signposting stakeholders to the previous SSA trial reports, the Stage 1 and Stage 2 documents and the FOA noise contours and data tables.		
A.3.2	Did the materials provide stakeholders with enough information to ensure that they understood the issue(s) <i>Partially</i> and potential impact(s) on them?		

	Two responses suggested that the consultation material and metrics were not understandable due to the technical language used. The change sponsor acknowledged that some documentation can be technical in nature and explained that a telephone helpline and an email for questions around this ACP were offered throughout the consultation.
	There were also a couple of responses highlighting that it was unclear from the documentation whether the noise reduction is achievable/there is any gain and to what geographical areas it applies to. The change sponsor explained that as no impacts were identified, they did not provide specific noise information for different locations. In some places, the documentation suggested that there was a noise increase (albeit imperceptible) for some households without explaining why, which resulted in consultation responses querying that.
	During Stage 1 of this ACP engagement there were a few themes raised by the aviation stakeholders that would have been beneficial to include more detail on in the consultation document (as opposed to simply providing links to the trial reports). Themes like speed control during SSA, availability of ILS and the impact of temperatures on RNAV approaches. During the consultation the same themes were developing, and the change sponsor captured those in the FAQ document. However, it raises a question on how many consultees have seen the table showing the impact of temperature on the angle of approach and it may be argued whether they are aware/understand that 3.2 degrees cannot and will not be regularly maintained by aircraft selecting to fly SSA due to being influenced by temperature, e.g. during the first SSA trial aircraft achieved an average of 3.14 degrees.
A.4	Length
A.4.1	Please confirm the start/end dates and the duration of the consultation below
	Start date: 5th March 2021 End date: 2nd April 2021
	Length: 4 weeks
A.4.2	·
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	questioning the need for any consultation.
	The change sponsor was confident that stakeholders who would be interested and who would respond to this consultation were already in a well-informed position due to engagement made throughout the trial periods, Stages 1 and 2 to ensure that they understand the procedures proposed.
	The sponsor was mindful of the ongoing COVID-19 pandemic and stated in their consultation strategy that in the event of an unforeseen disruption (for example, tighter Covid-19 restrictions), they would review the consultation period, if necessary.
A.4.3	Was the period of consultation proportionate? YES
	The CAA considered at the Stage 3 'CONSULT' Gateway that a 4-week consultation was appropriate and proportionate to this ACP due to the positive impact of the change and stakeholders responding from an informed position.
	There is evidence suggesting that a slightly longer period may have been beneficial for some stakeholders, e.g. Delta advised the sponsor that they missed the consultation deadline and queried whether they could still submit a response, although the stakeholder acknowledged the launch and reminder emails. Virgin Atlantic advised the sponsor that the email reached the stakeholder a few days after the consultation had already closed.
A.5	General
A.5.1	Was the conduct of the consultation aligned with the consultation strategy? YES
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	After reviewing the raw consultation responses (downloaded from Citizen Space), overall, the CAA is satisfied that the sponsor has accurately captured the issues raised by consultees in their consultation response document. There was one issue that the sponsor had not captured in the consultation response document but clarified it the 'Heathrow SSA Extra Information' document, as outlined in A.5.5 below.		
A.5.4	Does the consultation response document detail the change sponsor's response to the identified issues? YES		
	While the sponsor hasn't identified any issues/responses that may impact the final proposal, the consultation response document details the themes raised in consultation feedback and the sponsor's response to those. There was also a small number of responses that the change sponsor categorised as out of scope. Some of the key themes included:		
	Noise (reduction of) – responses that mentioned noise were in support of SSA and the small noise footprint benefit. Although British Airways conclusions were that while the analysis and modelling of the noise results show the SSA can provide a small noise benefit to local communities, this is unlikely to be perceptible on the ground and the benefits observed in the trial may not materialise in the day to day operation.		
	Response: The change sponsor acknowledged that SEL reduction by on average 0.51dBA is difficult to perceive from the ground, but it is an incremental step to reducing the impact of the airport's noise footprint.		
	The following 5 themes were raised by respondents who supported and did not support SSA:		
	Noise (increase of) – concerns raised around early landing gear deployment or deployment of flaps that could negatively impact the noise footprint.		
	Response: The change sponsor stated that evidence collected during the trials demonstrated that landing gear was deployed either at the same distance, but the aircraft was higher or, in the case of larger aircraft, later (closer to the runway). This theme was also included in the FAQ document.		
	Flight Technical / Safety – concerns raised around speed control and the potential for go-arounds and unstable approaches.		
	Response: The change sponsor explained that one of the Design Principles for this airspace change proposal was "Must not increase the number of go-arounds" and an option that contradicted this would not have progressed through the process. The sponsor stated that evidence collected during the trials demonstrated that there was slightly improved speed adherence compared to ILS approach and there were no increases in missed approaches. The change sponsor also added that since the trials in 2017 no safety observations have been raised. This theme was included in the FAQ document.		

Workload – concerns raised around increased ATC and pilot workload when flying SSA.

Response: The change sponsor stated that this point has been highlighted in their consultation document (indeed it was clearly highlighted as one of the main reasons for the lower number of RNAV arrivals compared to ILS arrivals) and also added that SSA is an elective procedure and ILS will continue to be available. Whilst it is clear that ATC and pilot workload limits the number of aircraft able to fly SSA, it is not clear what the limit (number/percentage) is. The change sponsor uses two different references; in 2019, 0.6% of arrivals flew SSA compared to 2% during the trials in 2015 – 2017. Within the formal submission the change sponsor states that currently ATC are able to decline requests from pilots to fly SSA and this will remain the case.

Amending current/introducing additional ILS equipment at a steeper approach angle to align with RNAV approaches

Response: The change sponsor explained that this option was considered earlier in the process and was discounted after Design Principle Evaluation as non-viable option. The sponsor also added that the feasibility of increasing ILS approach angle will be investigated as part of the wider Airspace Modernisation airspace change.

WebTAG – concerns around the WebTAG workbook showing increases in the number of households experiencing an increase in noise as result of SSA

Response: The change sponsor stated that the increase of 0.06 dB will be imperceptible to communities on the ground, but they had not initially explained why there's a 0.06 increase in the first place (please also see Environmental assessment). Clarification was subsequently included in 'Heathrow SSA Extra Information' document.

Increase the approach angle more than 3.2 degrees (references to 3.5 and 3.5+ degrees)

Response: Similar to the ILS issue raised above, the change sponsor explained that approaches steeper than 3.2 degrees were considered earlier in the process but discounted due to technical constraints, and the feasibility of increasing ILS approach angle will be investigated as part of the wider Airspace Modernisation airspace change. This theme was also included in the FAQ document.

Increase uptake/ incentivise use of SSA – with a couple of respondents suggesting making SSA compulsory during the night hours. BA specifically stated, quote "In order to improve compliance of flights flying the SSA, British Airways would recommend a SSA option with a precision approach (ILS) as well as an RNAV approach. In addition, a non-SAA ILS must be offered." HSPG provided a similar suggestion "If airlines and pilots will not increase uptake in SSA then HAL should consider the introduction of a second set of ILS for steeper than 3 degree approaches." One of the respondents asked whether an

	assessment had been undertaken on how many aircraft could be utilising the SSA in 2030, 2040 and 2050.	
	Response: The change sponsor stated that they would consider ways, where possible, to incentivise the u did not include any further details on that. It is also unclear what number/percentage of arriving aircraft the o would like to get using SSA.	
A.5.5	Is the change sponsor's response to the issues raised appropriate/adequate?	YES
	There were six stakeholders suggesting that the ACP offered no perceptible benefit and two of them (Richmo Campaign and LAANC), as part of their full responses, suggested that this ACP should be withdrawn and imp SSA should be postponed and form part of the overall options for future Airspace Modernisation airspace cha sponsor had not captured the point on postponing SSA implementation in their consultation response docume 'Heathrow SSA Extra Information' document, the change sponsor clarified that this suggestion was addressed of Responses' document and explained that SSA would not prohibit Airspace Modernisation.	lementation of nge. The change ent but within
	While the change sponsor's approach to capture only the key themes and messages in the consultation responses was completely appropriate (as opposed to capturing all the specific points raised in the consultation), this surraised by a small number of respondents, was worth including in the consultation response document.	
	The sponsor's response to most issues raised, as well as in determining that none of the consultation response amendment to the proposed design, is appropriate/adequate; more clarity could have been provided on the c plans to increase/incentivise use of SSA.	
A.5.6	Is the formal airspace change proposal aligned with the conclusions of the consultation response document?	YES
	The sponsor's 3D and 4A documents have been cross checked with their 4B document 'Airspace Change Pro of Step 4A no re-consultation was required, and the conclusions of the consultation response document are a formal airspace change proposal. The formal proposal does not contain any material that has not been consult	ligned with the
A.5.7	Was a Public Evidence Session required for this proposal? If yes, was any new evidence presented which could alter the conclusions of the consultation response document and/or formal airspace change proposal submission?	
	A Public Evidence Session was not required for this proposal.	

PART B	3 – Stage 5 Recommendations/Conditions/PIR Data Requirements			
B.1	Are there any Recommendations which the change sponsor <u>should try</u> to address either implementation (if approved)? If yes, please list them below.	er before or after	NO	
	GUIDANCE NOTE: Recommendations are something that the change sponsor <u>should</u> implementation, if indeed the airspace change proposal is approved. They may relate to sponsor is reliant upon a third party to actually come to an agreement and consequently as a Condition.	o an area in which th	ne change	
B.2	Are there any Condition(s) which the change sponsor <u>must fulfil</u> either before or after in approved)? If yes, please list them below.	nplementation (if	NO	
	GUIDANCE NOTE: Conditions are something that the change sponsor <u>must fulfil</u> either indeed the airspace change proposal is approved. If their proposal is approved, change condition(s) contained within the regulatory decision; failure to do so <u>will usually</u> result revoked. Conditions should specify the consequence of failing to meet that condition, w some alternative.	e sponsors <u>must</u> obs in the approval being	serve any	
B.3	Are there any specific requirements in terms of the data to be collected by the change s Implementation Review (if approved)? If yes, please list them below.	ponsor for the Post	YES	
	GUIDANCE NOTE: PIR data requirements concerns any specific data which the chang collate post-implementation, if indeed the airspace change proposal is approved. Pleas requirements so that they can be captured in the regulatory decision accordingly.			
	• The change sponsor is required to collate related stakeholder observations (enquiry/complaint data) and report it to the CAA. Any location/area from which more than 10 individuals have made enquiries/complaints must be plotted on maps displaying a representative sample of:			
	 aircraft track data plots 			
	 The change sponsor is required to monitor and report the noise impact of aircraft of compared to the 3.0° ILS approaches for all runways. 	operating RNAV 3.2°	approaches	
	 The change sponsor is required to record the number of RNAV 3.2° approa incentivisation/uptake action taken. This should be captured in a format to enable 			
CAA Consul	ultation Assessment Page 11 of 13	CAP 1616: A	Airspace Change	

	 Record details of any go-arounds resulting from RNAV 3.2° approaches.
	 Record details of any safety related issues associated with RNAV 3.2° approaches.
B.4	Does the consultation meet the CAA's regulatory requirements, the Government's guidance principles for consultation and the Secretary of State's Air Navigation Guidance?
	The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informed, valuable contributions to the proposal's development. I am satisfied that these principles have been applied by the change sponsor before, during and after the consultation. I am also satisfied that the change sponsor has conducted this consultation in accordance with the requirements of CAP 1616, that they have mostly demonstrated the Government's consultation principles and that the consultation has:
	 Taken place when the proposal was at a formative stage – whilst within their consultation strategy, the change sponsor stated that there was little opportunity to influence the airspace design itself, the change sponsor committed that in the event of significant opposition to the proposal, they would consider whether to discontinue Slightly Steeper Approaches. It would have been beneficial to include this statement within the consultation document too, but nevertheless this commitment implies that the sponsor was open minded and willing to be influenced by consultation feedback. Presented the consultation material clearly and outlined the potential impacts that needed to be considered – this consultation targeted aviation and non-aviation stakeholders. The explanations on technical aspects were written in plain language and accompanied by the relevant illustrations that could be understood by a reader without aviation knowledge or expertise. There was lack of clarity on some environmental aspects and lack of details on some technical aspects, which may have been beneficial for the stakeholders in determining/understanding the impacts of this airspace change proposal on them. However, given the extensive stakeholder engagement throughout the trial periods, Stages 1 and 2, it is reasonable to conclude that the sponsor was consulting with an informed audience and therefore the consultation material was sufficient. Provided a sufficient timeframe to allow considered responses – longer period may have been beneficial for some stakeholders (as explained in A.4.3.), but at Stage 3 'CONSULT' Gateway the CAA considered that a 4-week consultation was a sufficient timeframe to allow considered responses. Taken into account the product of the consultation – overall the change sponsor correctly identified the issues raised by consultees, accurately captured and responded to those. The sponsor's response in determining why none of the consultation responses require any amen

PART C – Consultation	Assessment Summary	/ and Recommendation
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The change sponsor conducted excessive engagement on this ACP throughout the trial periods, Stages 1 and 2. The change sponsor targeted the right and informed audience and consulted them in a suitable way. Members of the public were also able to view the consultation via the sponsor's website and social media platforms and could provide a response.

The consultation materials produced were simple, with technical information explained in an accessible manner for an everyday audience. Overall, the information provided was sufficient for consultees to understand the issues and the impact of the proposals on them. Although, the consultation document could benefit from further technical information, clarity on some environmental aspects and transparency in regard to limited opportunity to influence the SSA design.

The change sponsor conducted a 4-week consultation asking consultees whether they supported the permanent adoption of Slightly Steeper Approaches at Heathrow Airport. Longer period may have been beneficial for some stakeholders. There was a total of 132 responses received, with 120 supporting the proposed changes. None of the consultation responses required any amendment to the proposed design and, overall, the change sponsor has accurately captured and adequately responded to the issues raised by consultees in their consultation response document.

It is recommended that the airspace change proposal is approved.

Airspace Regulator (Engagement and Consultation)			21/07/21
PART D – Consultation Assessment Approval			
Manager Airspace Regulation			29/07/21

Please see accompanying CAA Operational Assessment for Final Regulatory Decision made by Head of Airspace, ATM and Aerodromes