

LHR Response to ACP – 2019- 086 Comprehensive List of Options – 7th May 2021

To whom it may concern,

Thank you for the recent engagement on the Comprehensive list of Options that have been developed for your RNAV (GNSS) Approach Rwy21 airspace change.

Heathrow has reviewed the list of options against your Design Principles and notes the options are aligned to your Design Principles and have taken stakeholder feedback into account where appropriate. As the constraints on this ACP mean that there will be no interaction with, or changes to the Heathrow operation, we do not have any comments as to what would be the most or least supported in terms of the options; this will be determined by your local communities who are directly affected. However, we remain keenly interested to understand the outcome and your final preferred option.

Notwithstanding the above, we do have the following comments. Para 1.3.2 of the document refers to 2014 Heathrow Trials and cites these as evidence for not exploring the 'radical' ACP options further. The paragraph describes two distinct elements, Dispersion and RNAV to intercept the ILS. In 2014, Heathrow did commence a trial to assess the opportunities and risks in providing dispersion along a departure route. The trial was not adopted permanently as further technical and ATM tool support would have been required to implement and expand the use of dispersion for the route and this was not readily available at the time. The RNAV to ILS reference was not part of the 2014 trials but a consideration in design options for Heathrow's paused FASI S airspace change. In both cases, Heathrow has evidence to the prior pros and cons of these 'radical' options and their application in the Heathrow operation. However, our experiences should not preclude the consideration of options, and where appropriate, investigation into the feasibility of implementation, including what has changed since 2014, at different airports.

Heathrow is encouraged that LBHA has included steeper gradients for Final Approach in the list of options. As you will be aware, Heathrow is currently progressing an ACP to implement the 3.2-degree slightly steeper approach trial permanently and, whilst the benefits are small, it does show an appetite for the aviation industry to take steps to reduce noise disturbance where possible.

We look forward to continuing to engage with you as your airspace change develops.

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