



AIRSPACE MODERNISATION AIRSPACE CHANGE PROPOSAL

STAKEHOLDER ENGAGEMENT APPENDIX G

FRIENDS OF RICHMOND PARK ADDITIONAL CORRESPONDENCE





Table of Contents

1. Email to FRP regarding Stage 2 shortlisted options	3
2. FRP letter to Heathrow	5
3. Heathrow letter to FRP	8
4. Email exchange regarding Stage 2 Submission documentation	10

The material in this document is shown in chronological order.

From: [REDACTED]
Sent: 25 July 2023 08:18
To: [REDACTED]
Cc: DD - Airspace
Subject: Heathrow Stage 2 Shortlisted Options

Dear [REDACTED]

Thank you for continuing to take the time to engage with us on Heathrow's Airspace Change Proposal, including at the recent sessions where we talked through our proposed methodology and shortlisting for the Initial Options Appraisal as part of Step 2B.

Following the engagement sessions, and pre-submission of our Stage 2 documentation, we have been conducting a final internal review and sign-off of all our Stage 2 documentation. During this review, it was noted that the shortlisting approach applied to PBN Arrival Option 'I' to runway 27R was not entirely consistent with the approach taken to other PBN Arrival options.

As we explained in the sessions, we applied 6 'tests' to each option, founded on the altitude-based priorities set out in the government's Air Navigation Guidance 2017. In the sessions we proposed that Option 'I' would be discontinued on the basis of increased overflight of AONBs and Richmond Park (tests 4 and 5). However, on further review we have identified other options that have a similar level of overflight of both AONBs, and Richmond Park and we think it is more appropriate to address these local issues when we develop system options at the beginning of Stage 3. Our aspiration is that we will be able to refine some of these options to reduce the potential overflight and/or impacts over AONBs and Richmond Park.

We have therefore taken the difficult decision to reinstate Option 'I' and to include it in the shortlisted options. This is not a decision we have taken lightly, and we are aware of the disappointment this will cause; however, the CAA and other stakeholders will expect us to demonstrate consistency in our approach to the shortlisting of options.

We highly value the working relationship that [REDACTED] and the wider team have built with you over the past year and sincerely hope that we can continue to work closely with Friends of Richmond Park when developing system options based on our current shortlisted options. This work will take place over the coming months and, as we set out in the recent engagement material, we will be seeking to avoid impacts to Richmond Park as far as possible given it has been identified through community engagement as "a local circumstance".

To enable this I, as the ACP lead, commit to the following:

1. When compiling system options based on the current shortlisted options, we will seek to minimise impacts to Richmond Park and will engage closely with Friends of Richmond Park in this process.
2. This process will include an assessment of the overall viability and impacts of PBN Arrival options, including their impact on Richmond Park.
3. We will undertake a more detailed Biodiversity & Tranquillity assessment of Richmond Park, as set out in the latest Stakeholder Engagement Record (SER), commencing at the beginning of Stage 3 (likely September 2023). We will engage with you on both the proposed methodology and emerging findings of this work.

If you wish to discuss any of the matters outlined above, please do contact myself or [REDACTED] directly.

Kind regards,

[REDACTED]

[REDACTED]

Airspace Change Policy Manager

Heathrow

The Compass Centre, Nelson Road
Hounslow, Middlesex, TW6 2GW

m [REDACTED]

w: [heathrow.com](https://www.heathrow.com) t: twitter.com/heathrowairport

a: [heathrow.com/apps](https://www.heathrow.com/apps)

From: [REDACTED]
Sent: 27 July 2023 16:47
To: [REDACTED]
Cc: [REDACTED] DD - Airspace
Subject: RE: Heathrow Stage 2 Shortlisted Options
Attachments: 2023 07 27 FRP letter to HAL.pdf

Caution: external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments.

Dear [REDACTED]

Thank you for your email. I attach our response.

Regards

[REDACTED]

[REDACTED]

Chairman, The Friends of Richmond Park
www.frp.org.uk
[Friends of Richmond Park | Twitter, Instagram, YouTube | Linktree](#)



27 July 2023

██████████
Heathrow Airport Limited
████████████████████

██████████
Heathrow Stage 2 Shortlisted Options – Friends of Richmond Park

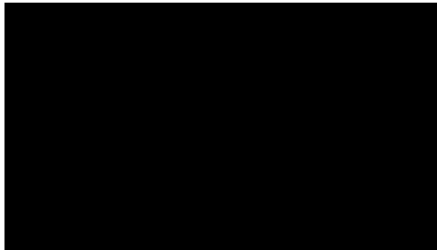
We refer to your email of 25 July 2023 at 8:18am.



1. We are still considering your email, sent at the eleventh hour before what we understand to be the end of Stage 2. But The Friends of Richmond Park's ("**FRP**") position is that including Option I, and any other options which impact Richmond Park significantly more than today, is not consistent with the methodology and shortlisting approach which Heathrow Airport used for the Initial Options Appraisal. It is also not in accordance with the consultation, engagement, and process requirements of CAP1616.
2. Heathrow Airport has applied a methodology and shortlisting approach based on the altitude-based priorities set out in the Air Navigation Guidance 2017. CAP1616 requires Heathrow Airport to engage with stakeholders to explore the options it has identified. In those engagements, Heathrow Airport stated that as part of 'test 5' - whether local circumstances are impacted significantly more than today (a requirement of ANG17 3.3 (f) and CAP1616 B76-B78) – Richmond Park was a specific area which should be avoided where possible. If an option significantly impacted Richmond Park more than today, it would be discontinued. It is clear that is how Heathrow Airport understood test 5, as it was the basis on which Option 'I' to runway 27 R was discontinued.
3. Accordingly, Heathrow Airport should be discontinuing all options which impact Richmond Park significantly more than today.
4. Should Heathrow Airport instead include options which significantly impact Richmond Park more than today, we intend to inform the Civil Aviation Authority that we consider the Stage 2 process has not been properly conducted and the defects should be remedied before the CAA passes the proposal through the gateway.
5. We understand that Heathrow Airport will be submitting its Stage 2 documentation to the CAA on 28 July 2023. We would ask that you provide us with all and any documents which you upload to the portal immediately after submitting them which address:
 - (i) the initial options appraisal;
 - (ii) the shortlisting process and criteria; and
 - (iii) the options shortlisted and why.

6. We envisage that this will include:
 - (i) an initial options appraisal report;
 - (ii) an initial options appraisal full analysis table; and
 - (iii) detailed maps of the long-listed and shortlisted options.

7. As to the Stakeholder Engagement Record between FRP and Heathrow Airport, we have not had an opportunity to fully review the latest version received on 17 July in light of this and Heathrow Airport's latest emails. For the avoidance of doubt, we do not consider our concerns have been adequately addressed.

Yours sincerely




Chairman
The Friends of Richmond Park


From: [REDACTED]
Sent: 03 August 2023 11:54
To: [REDACTED]
Cc: [REDACTED]; DD - Airspace
Subject: RE: Heathrow Stage 2 Shortlisted Options
Attachments: 230803_HAL Response to FoRP Letter Dated 27th July 2023.pdf

Dear [REDACTED]

Thank you for your email and letter. I attach our response.

Both letters will be submitted to the CAA as additional Engagement evidence as part of our Stage 2 submission.

Kind regards

[REDACTED]
[REDACTED]
Airspace Change Policy Manager

Heathrow

The Compass Centre, Nelson Road
Hounslow, Middlesex, TW6 2GW

m: [REDACTED]
w: [heathrow.com](https://www.heathrow.com) t: twitter.com/heathrowairport
a: [heathrow.com/apps](https://www.heathrow.com/apps)

03rd August 2023

Dear [REDACTED]

Thank you for your letter regarding the Stage 2 shortlisted options.

1. Shortlisting of PBN Arrival Option I to runway 27R

We understand your disappointment at the inclusion of Option I in the shortlisted options at the end of Stage 2. When we engaged with stakeholder representatives at workshops over the period 27 June – 4 July, we indicated an intention to discontinue Option I. This was an option that Friends of Richmond Park had told us was of specific concern to them and we had listened carefully to that feedback.

However, on reviewing the discontinuation approach and results prior to submission at Stage 2, we found that the approach applied to Option I was not entirely consistent with the approach taken to other options with potential impacts to AONBs and the park. Given the clear guidance in CAP1616 that the appraisal of options at Stage 2 should be undertaken in a fair and consistent manner (see, for example, para 128), we came to the view that it would be premature at this stage to discontinue an option that had similar IOA results to other options which have been shortlisted. We reached this decision applying professional judgement on matters that involve technical predictive assessments.

We note your comment that you feel the shortlisting of Option 'I' was not consistent with our methodology and approach for shortlisting options. CAP1616 does not prescribe a shortlisting methodology to be applied at Stage 2. We developed shortlisting "tests" to provide a framework for the shortlisting of options that reflected the altitude-based priorities from Air Navigation Guidance 2017. However, the tests we developed were not intended to be based purely on data alone and it is important that we exercise professional judgement when shortlisting options.

The process of compiling the current list of 151 options into a smaller number of system options will involve an element of shortlisting and discontinuation early in Stage 3. We consider it most appropriate to address impacts on local circumstances, such as Richmond Park and AONB's, at this point. As part of our future activities, we will continue engaging with Friends of Richmond Park as we develop our airspace change in line with CAP1616.

2. Stage 2 Submission

We submitted our Stage 2 documentation to the CAA on Friday 28 July, as planned. We are now undergoing the process of redacting each of the documents to ensure that no personal information is shared anywhere (e.g., stakeholder names, email addresses etc). We will upload all the documents to the CAA portal once this process is complete, and we will email you to let you know when the documents are live.

The documents include our approach to the DPE and the IOA, the results of the IOA for each option and maps of all shortlisted and discontinued options. As discussed previously, we can also prepare information for you that summarises the remaining options that potentially impact Richmond Park when we begin Stage 3. This may help facilitate our discussions on the compilation of system options.

Kind regards,

[REDACTED]

[REDACTED]

Airspace Change Policy Manager

From: [REDACTED]
Sent: 04 August 2023 15:18
To: [REDACTED]
Cc: [REDACTED]; DD - Airspace
Subject: RE: Heathrow Stage 2 Shortlisted Options

Caution: external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments.

Dear [REDACTED]

Thank you for your letter of 3 August which we are considering.

In our letter of 27 July, we asked for sight of any documents which address: (i) the initial options appraisal; (ii) the shortlisting process and criteria; and (iii) the options shortlisted and why. We envisage that this will include (i) an initial options appraisal report; (ii) an initial options appraisal full analysis table; and (iii) detailed maps of the long-listed and shortlisted options. We are requesting these because we understand these have changed materially from the versions shared with stakeholders a month ago.

We would not expect any of these documents to contain personal information which would require redaction.

We repeat our request that they be disclosed to us immediately, ahead of their being uploaded on the CAA website.

Kind regards

[REDACTED]

From: DD - Airspace
Sent: 07 August 2023 12:01
To: [REDACTED]
Cc: [REDACTED]; DD - Airspace
Subject: RE: Heathrow Stage 2 Shortlisted Options

Dear [REDACTED]

As you will have seen from my email on Friday 5th Aug, our Step 2A documents are now available to view on the CAA's Airspace Change Portal. Unfortunately we have not yet been able to upload our Step 2B documentation (including IOA related material) due to a technical issue with the portal. We understand your frustration with this and we are receiving regular updates from the CAA and hope that the issue will be resolved soon. Due to their size, we are also not able to attach and send any documents by email.

We will be in touch in due course when the documents are publicly available on the portal.

Kind regards,

[REDACTED]
[REDACTED]
Airspace & AT [REDACTED] Engagement Specialist

Heathrow

The Compass Centre, Nelson Road
Hounslow, Middlesex, TW6 2GW

w: [heathrow.com](https://www.heathrow.com) t: twitter.com/heathrowairport
a: [heathrow.com/apps](https://www.heathrow.com/apps)