



***AIRSPACE MODERNISATION AIRSPACE CHANGE  
PROPOSAL***

***STAKEHOLDER ENGAGEMENT APPENDIX F***

***STAGE 2 GENERAL CORRESPONDENCE  
February 2022 - July 2023***





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### Revision History

Version	Date	Amendment	Author
1.0	28 <sup>th</sup> July 2023	Initial issue	Heathrow Airport Ltd
2.0	07 <sup>th</sup> June 2024	Text added to front page to make clear all correspondence in this document was received before 28th July 2024. All correspondence received post this date is contained further appendices	Heathrow Airport Ltd

# Heathrow's ACP for Airspace Modernisation

DD - Airspace <airspace@heathrow.com>

Thu 10/02/2022 09:22

To: [REDACTED]

Cc: DD - Airspace <airspace@heathrow.com>

Dear [REDACTED]

Thank you for your enquiry via our website form. We would be happy to involve CAGNE in future engagement on Heathrow's ACP for Airspace Modernisation and I will add your name and email address to our stakeholder list.

Our Stage 1 submission to the CAA on Design Principles for our airspace change will be available on the CAA's portal soon. We are currently planning our approach to stakeholder engagement for Stage 2 and we will be in touch once we have a firm plan for engagement over 2022/23.

Many thanks,

[REDACTED]

[REDACTED] | Airspace Modernisation Programme

**Heathrow**

From: [REDACTED]

Sent: 14 February 2022 17:05

To: DD - LHR Noise Complaints <noise@heathrow.com>

Cc: [REDACTED]

Subject: Heathrow Airspace Modernisation Feedback - Westminster City Council

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

To whom it may concern,

Please find attached Westminster City Council's feedback on Heathrow Airspace Modernisation ([Airspace modernisation | Heathrow](#)), as there was not sufficient space in the online feedback box for our views. Please could you confirm by response that this has been received and will be considered as part of the consultation.

If you require any further information about our response, please contact [REDACTED] and [REDACTED]. We look forward to hearing from you.

Kind regards,

[REDACTED]  
Senior Policy Development Officer

Tel: [REDACTED]

E-mail: [REDACTED]

[www.westminster.gov.uk](http://www.westminster.gov.uk)

## Airspace Modernisation Consultation Feedback

Westminster City Council  
64 Victoria Street, London SW1E 6QP

Westminster City Council is strongly of the view that any proposed expansion or modernisation or alteration of flight paths at Heathrow should not come at the expense of air quality or additional noise. There is considerable evidence that aviation leads to air pollution, significant carbon emissions, and noise pollution, affecting individuals' physical and mental health, their productivity, and local air quality. Expanding existing airports risks increasing the impacts of all these factors as well as causing further damage to the natural environment. Alongside air pollution, night-time noise pollution is a particular concern from air traffic; as we have previously made clear, we do not support Heathrow becoming a 24-hour flightpath facility or increasing any night-time activity.

Any adverse impact on air quality around Heathrow will affect all of Greater London and, without careful risk assessment and mitigation from any expansion proposals, could hinder efforts to meet national legal objectives for air pollution. Equally, increases in carbon emissions could put the UK's trajectory towards net-zero by 2050 at risk.

We would like you to ensure that open consultations are held on proposed design principles, with full transparency on modelled air and noise pollution, with detail on flight paths and clarity on how adverse impacts will be mitigated so that the UK's air quality targets are not compromised. We also request that sufficient notice is given for any proposed changes so that we can be consulted and to allow residents' voices to be heard. We also ask that all area-based noise and air quality implications, including current and proposed flight paths be provided as part of any consultations, to allow us to assess the potential impacts on the residents of Westminster.

# RE: Heathrow Airspace Modernisation Feedback - Westminster City Council

DD - Airspace <airspace@heathrow.com>

Tue 22/02/2022 10:01

To: DD - Airspace <airspace@heathrow.com>; [REDACTED]

Cc: [REDACTED]

Dear [REDACTED]

Thank you for your feedback on Heathrow's airspace modernisation plans, on behalf of Westminster City Council. If you would like to share any feedback or raise any queries in future then it is best to use this email address: [airspace@heathrow.com](mailto:airspace@heathrow.com)

We initiated a new airspace change proposal (ACP) to meet the requirements of the Government's Airspace Modernisation Strategy in 2021. We undertook stakeholder engagement on our design principles in September-December 2021 which included two phases of workshops with local community groups and Local Authority representatives. We invited [REDACTED] from Westminster City Council but did not receive a response.

We identified a set of design principles based on stakeholder feedback and submitted these to the Civil Aviation Authority (CAA) at the beginning of February, along with evidence of all of the stakeholder engagement that informed the list of principles. Our submission is now available on the CAA's public portal: [Airspace change proposal public view \(caa.co.uk\)](https://www.caa.co.uk/airspace-change-proposal-public-view).

We expect to have confirmation on whether our design principles have been accepted by the CAA before the end of this month. I have shared our final design principles below and I hope this provides some comfort that Heathrow is aware of the issues and concerns raised in your feedback, and is seeking to develop a new airspace design that meets the needs and objectives of our stakeholders. You will see that there are two groups of design principles:

- the first five principles are requirements that our airspace design "must" achieve,
- the remaining seven principles are objectives that our airspace design "should" achieve, but we recognise that it might not be possible to develop a design that achieves all of these principles in every location.

These 12 design principles will inform the development of airspace design options and we will share a "Design Principle Evaluation" which will show how well the flight path options we will develop meet these principles.

This airspace change is for modernisation of routes to/from our existing two runways and does not involve expansion of the airport.

We are following the CAA's guidance for airspace change ([CAP1616](#)) and this requires us to undertake stakeholder engagement when developing design principles, but it does not require a full public consultation. We will be undertaking a public consultation on flight path options at Stage 3 of the process, likely to be around 2025, and we will then share detailed maps of flight path options, information on how these differ to today's routes, and detailed noise and environmental modelling to show the expected impacts of the proposed changes. This information will allow you, and your residents, to assess the potential impacts on the Westminster area.

We already have [REDACTED] on our stakeholder list and will keep him informed of developments and opportunities for engagement. Please let me know if there is anyone else at Westminster City Council who you would like us to add to our stakeholder list.

Kind regards,

[REDACTED] | Airspace Modernisation Programme  
**Heathrow**

## Final Design Principles

Our new airspace design <b>must</b>	Be safe	1
	Remain in accordance with the CAA's published Airspace Modernisation Strategy and any current or future plans associated with it and all other relevant UK policy, legislation and regulatory standards (for example, Air Navigation Guidance). This includes preventing any worsening of local air quality due to emissions from Heathrow's aircraft movements, to remain within local authorities' limits	2
	Use noise efficient operational practices to limit and, where possible, reduce adverse impacts from aircraft noise	3
	Reduce the contribution to climate change from CO <sub>2</sub> emissions and other greenhouse gas emissions arising from Heathrow's aircraft activities	4 6

	Enable Heathrow to make the most operationally efficient and resilient use of its existing two runways, to maximise benefits to the airport, airlines and cargo handlers, passengers, and local communities	5
	Provide predictable and meaningful respite to those affected by noise from Heathrow's movements	6
	Seek to avoid overflying the same communities with multiple routes including those to/from other airports	7
	Contribute to minimising the negative impacts of night flights	8
And <b>should</b> also	Keep the number of people who experience an increase in noise from the future airspace design to a minimum	9
	Keep the total number of people who experience noise from the future airspace design to a minimum	10
	Enable the efficiency of other airspace users' operations	11
	Minimise the impact to all stakeholders from future changes to Heathrow's airspace	12

## RE: Heathrow Airspace Modernisation Feedback - Westminster City Council

[REDACTED]  
Thu 24/02/2022 17:36

To: DD - Airspace <airspace@heathrow.com>

Cc: [REDACTED]

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

Hi [REDACTED]

Thank you for your response and for the update on the design principles. Please could [REDACTED] be added to the stakeholder list moving forwards.

Kind regards,

[REDACTED]  
Senior Policy Development Officer

E-mail: [REDACTED]

[www.westminster.gov.uk](http://www.westminster.gov.uk)



## RE: Heathrow Airspace Modernisation Feedback - Westminster City Council

DD - Airspace <airspace@heathrow.com>

Tue 08/03/2022 18:07

To: [REDACTED]; DD - Airspace <airspace@heathrow.com>

Cc: [REDACTED]  
[REDACTED]

Thanks for your email [REDACTED]. I have added [REDACTED] to our stakeholder list and we will be in touch with both [REDACTED] and [REDACTED] regarding future engagement on our airspace change proposal.

Kind regards,

[REDACTED] | Airspace Modernisation Programme

**Heathrow**

## Change of flight paths for existing runways



Fri 25/02/2022 11:57

To: DD - Airspace <airspace@heathrow.com>

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

Hi,

I spoke with the community relation team who said I should contact you regarding the change of flight paths for the existing runways (part of airspace modernisation).

Is this still progressing as per the below document (slide 7), i.e. changes being implemented in 2022, or is it delayed? If so, please give me an indication of when changes would come into effect.

Kind regards,



[Airspace and Future Operations Consultation Document.pdf \(heathrow.com\)](#)

## RE: Change of flight paths for existing runways

DD - Airspace <airspace@heathrow.com>

Thu 10/03/2022 13:37

To: [REDACTED]

Cc: DD - Airspace <airspace@heathrow.com>

Dear [REDACTED]

Thank you for your email regarding our airspace change proposal for Airspace Modernisation. This is a new airspace change proposal to modernise flight paths to and from our existing two runways and is unrelated to our previous airspace change proposal for Expansion (which involved the design of new flight paths for a proposed three-runway Heathrow).

The document you have attached relates to our previous plans for Expansion, and was published in 2019 as part of a public consultation that we held to collect views on those plans. Our Expansion plans were paused in March 2020, and those plans remain on hold whilst the business recovers from the impacts of Covid-19. However, Heathrow remains committed to delivering airspace modernisation in line with the Government's Airspace Modernisation Strategy, and is therefore proposing to progress the changes required to keep pace with the wider UK programme, via this new ACP, based on our existing two runways. You can find out more on our website: [Airspace modernisation | Heathrow](#)

We are following the Civil Aviation Authority's (CAA) airspace change process ([CAP1616: Airspace change Guidance](#)) and we are just beginning Stage 2 of the process, where we will develop and assess flight path options. We will undertake a public consultation on flight path options – which is likely to be around 2025. We would not expect airspace changes to come into effect until 2027-2029.

Kind regards,

[REDACTED] | Airspace Modernisation Programme

**Heathrow**

## Re: Change of flight paths for existing runways

[REDACTED]  
Thu 10/03/2022 13:39

To: DD - Airspace <airspace@heathrow.com>

You don't often get email from [REDACTED]. [Learn why this is important](#)

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Hi [REDACTED]

Thanks for the response, much appreciated.

I will sell my home and move in that case.

Kind regards,  
[REDACTED]

# Update on Heathrow's Airspace Modernisation Proposal

DD - Airspace <airspace@heathrow.com>

Fri 11/03/2022 17:27

To: DD - Airspace <airspace@heathrow.com>

Cc:

Bcc:

Dear All,

I wanted to let you know that the CAA has confirmed that we have passed the Stage 1 Gateway, following our Design Principles submission last month. The full submission is available to view on the CAA's public portal, and includes our final 12 design principles for this airspace change, and evidence of all stakeholder engagement that informed the principles: [Airspace change proposal public view \(caa.co.uk\)](https://www.caa.co.uk/airspace-change-proposal-public-view).

Many thanks to all of you who contributed to the development of our design principles. We are currently developing our plans for stakeholder engagement over Stage 2 of the airspace change process (the stage known as "Develop and Assess") and we will be in contact to invite you to engage with us on our developing airspace design options later this year.

As you are probably aware, the CAA's airspace change process ([CAP1616: Airspace change](https://www.caa.co.uk/cap1616-airspace-change)) requires us to hold a public consultation on final flight path options and we anticipate the consultation will be held around 2025, but we will keep you informed as our plans develop.

Kind regards,

██████████ | Airspace Modernisation Programme

**Heathrow**

## Re: Update on Heathrow's Airspace Modernisation Proposal

DD - Airspace <airspace@heathrow.com>

Fri 11/03/2022 17:31

To:

Cc: DD - Airspace <airspace@heathrow.com>

Dear [REDACTED],

I received a bounceback from [REDACTED] when sending the update below. Please could you confirm who we should include as our key contact at London Borough of Sutton for engagement on Heathrow's airspace change proposal?

Many thanks,

[REDACTED]

## Re: Update on Heathrow's Airspace Modernisation Proposal

[REDACTED]  
Wed 30/03/2022 12:22

To: DD - Airspace <airspace@heathrow.com>

Cc: [REDACTED]

**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 below. I wanted to query your anticipated timing of any public consultation on 'final' flight paths, set out below as probably 2025. The process set out in CAP1616 gives a c.110 week (c. 2 year) cycle for the process up to and including stage 6.

Stage 2 Develop and Assess is designated as c. 13 weeks (after Stage 1b approval, notified by the CAA on 3/3/22);

Stage 3 Consultation is set as c. 35 weeks to prepare and do;

Stage 4 Update & Submit is c. 6 weeks;

Stage 5 Decide (with the CAA) is c. 27 weeks; and

Stage 6 Implement is 16 weeks.

Stage 7, the Post Implementation Review is not given a firm timing.

By my reckoning, the Consultation Stage 3 should be happening in late 2022 or early 2023. How does that fit with your anticipated timing of 2025? Or are you not anticipating that Stage 3 will include a public consultation? If there is to be a fundamental change to the CAP1616 timings, for those of us who are feeding back information to Councils and residents' groups, it would be helpful to understand the revised timings in more detail.

With many thanks,

[REDACTED]  
MRA & Elmbridge

## RE: Update on Heathrow's Airspace Modernisation Proposal

DD - Airspace <airspace@heathrow.com>

Mon 04/04/2022 15:04

To: [REDACTED] DD - Airspace <airspace@heathrow.com>

Cc: [REDACTED]

Dear [REDACTED]

Thanks for your email re our airspace modernisation proposal. You are correct that CAP1616 sets out “typical” timescales for an ACP, however these timescales are more applicable to a smaller scale airspace change than the complete airspace redesign required for us to introduce airspace modernisation in line with Government policy. A smaller scale ACP at Heathrow (such as a proposed change to one departure route) might be deliverable within the 110 week period estimated in CAP1616, however airspace modernisation requires us to look at all potential arrival and departure routes and to consider all potential impacts of these changes. We also need to fit into the airspace change taking place above 7000ft (which is managed by NATS) and to coordinate with the surrounding UK airports who are re-designing their own flight paths for modernisation. All of this adds significant complexity and time to the airspace change process.

The CAA’s CAP1616 process recognises that some ACPs will take longer in paragraph 93:

“The timescale for completion of the full airspace change process will inevitably depend on the complexity of the airspace design and the potential impacts of the change. These factors will determine the amount of design work and analysis of the impact of different options, the degree of consultation and engagement needed with those affected, and how quickly a solution can be developed that takes their views into account (Para 93, CAP1616)”

We are still proposing to undertake public consultation around 2025 and we will keep you and other stakeholders informed on any revisions to those timescales. The public consultation is a statutory requirement of the CAP1616 process at Stage 3 so will definitely form a key part of our engagement plans.

I hope this information helps – please do let me know if you have any other questions.

Kind regards,  
[REDACTED]



## RE: Update on Heathrow's Airspace Modernisation Proposal

[Redacted]

Mon 04/04/2022 15:20

To: DD - Airspace <airspace@heathrow.com>

Cc: [Redacted]

Some people who received this message don't often get email from [Redacted] [Learn why this is important](#)

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Many thanks, [Redacted] That is very helpful. I will feed that back to Elmbridge and the MRA.

Kind regards,

[Redacted]

**From:** [REDACTED]  
**Sent:** 25 June 2022 12:30  
**To:** DD - Airspace  
**Subject:** Re: LATEST SITUATION ON PROPOSED CHANGES

You don't often get email from [REDACTED] [Learn why this is important](#)

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

Dear Communications Department

it's just over a year since we corresponded on the planned airspace changes for Heathrow. At that time, Covid had put so much on hold, including your plans. Could you let me know what you plans are now that we're all emerging into something like normality? Is there a new or revised timetable for the airspace changes? And if so, what are they?

Yours sincerely

[REDACTED]  
17 Cleveland Square [REDACTED]  
(Committee member, Cleveland Square Residents Association, and member of SEBRA, South East Bayswater Residents Association).

**From:** DD - Airspace  
**Sent:** 29 June 2022 09:28  
**To:** [REDACTED]; DD - Airspace  
**Subject:** RE: LATEST SITUATION ON PROPOSED CHANGES

Dear [REDACTED]

Thank you for your email. Since your last email, Heathrow has begun a new airspace change proposal (ACP) to introduce airspace modernisation on our existing two runways. Our Expansion plans remain on pause, but we are committed to airspace modernisation and to keeping pace with the wider UK programme. We are working closely with the Airspace Change Organising Group (ACOG) and other airports to develop plans that integrate and work together across the UK. You can find out more on our website here: [Airspace modernisation | Heathrow](#)

The expected timeline for implementing this airspace change is shown below. We are following the Civil Aviation Authority’s airspace change process, known as CAP1616. You can follow the progress of our airspace change on the CAA’s airspace change portal: [Airspace change proposal public view \(caa.co.uk\)](#)

You will see that we intend to consult on our proposals in 2024/2025 – this will involve a full public consultation to spread awareness and capture peoples’ views. Please let me know if you would like me to add you to our stakeholder list to ensure that we email you directly in advance of the consultation?

Kind regards,  
 [REDACTED]

CAP1616	2021	2022	2023	2024	2025	2026	2027	2028	2029
Stage 1 Define	Active								
Stage 2 Develop & Assess		Active	Active						
Stage 3 Consult				Active	Active				
Stage 4 Update & Submit						Active	Active		
Stage 5 CAA Decide							Active		
Stage 6 Implement							Active	Active	Active

**From:**  
**Sent:**  
**To:**  
**Subject:**

[REDACTED]  
30 June 2022 15:55  
DD - Airspace  
Re: LATEST SITUATION ON PROPOSED CHANGES

**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 so much for your fast and efficient response to my enquiry - and for sending a great quantity of information.

It is very kind of you to offer to add me to your stakeholder list to receive further emails and notice of consultation. If you would do so I'd be more than pleased.

One thing in the meantime - I've had a look through the attached documents and can't find diagrams of the latest proposed changes in the flight paths in and out of Heathrow. I've certainly been able to find such diagrams before so maybe I'm not looking in the right place - there's so much material - so I wondered if you could help by pointing me in the right direction?

Sorry to be a pest but it would be a great help in my understanding.

And thank you for your help

Kind regards

[REDACTED]

**From:** DD - Airspace  
**Sent:** 12 July 2022 10:56  
**To:** [REDACTED]  
**Cc:** DD - Airspace  
**Subject:** RE: LATEST SITUATION ON PROPOSED CHANGES

Dear [REDACTED]

We are currently at a very early stage of the design process for this airspace change, so we do not have proposed flight paths to share yet.

We will be developing a “comprehensive list of options” to meet Stage 2A of the CAA’s process over the coming months and we will invite you to engage with us on the material we develop. We will then have proposed flight path options to share at public consultation at Stage 3. As shown on the timeline in my previous email, we expect to reach this stage in 2024/25. At the consultation, we will need to share the proposed flight paths for the new airspace design, and to show how these differ to today’s flight paths, but we do not have this information yet.

I hope that helps. We will be in touch to invite you to attend a Stage 2 engagement workshops later this year.

Kind regards,

[REDACTED]

**From:** [REDACTED]  
**Sent:** 12 July 2022 13:30  
**To:** DD - Airspace  
**Subject:** Re: LATEST SITUATION ON PROPOSED CHANGES

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

Many thanks, [REDACTED] Good of you to keep me informed. I look forward to the Stage 2 workshops.

Regards

[REDACTED]

From: [REDACTED]

Sent: 08 August 2022 12:56

To: [REDACTED]

Cc: [REDACTED]

Subject: Heathrow Airspace Modernisation

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

Dear [REDACTED]

I am following up on our HAL/Friends of Richmond Park Teams meeting on 20 June 2022, at which we promised to let you know of any bodies involved in the management of other local green spaces that we believe should be invited to participate in the consultation, in addition to the ones whom you have already contacted.

We suggest the following:

- The Royal Parks, who manage all the London royal parks, including Richmond Park and Bushy Park- the relevant contact there is [REDACTED], Director of Estates and Projects, at [REDACTED]

- Wimbledon and Putney Commons Conservators and Friends, who manage Wimbledon Common - the relevant contact there is [REDACTED], Chairman. Their email address is [REDACTED]

Kind regards

[REDACTED]

Secretary  
The Friends of Richmond Park

**From:** [REDACTED]  
**Sent:** 08 August 2022 13:52  
**To:** [REDACTED]  
**Cc:** [REDACTED] DD - Airspace  
**Subject:** RE: Heathrow Airspace Modernisation

Thanks very much [REDACTED]

I have added both of these contacts to the Stakeholder List and we will be in touch with them prior to any public engagement on our airspace change.

Many thanks,  
[REDACTED]



**From:**  
**Sent:**  
**To:**  
**Subject:**

11 August 2022 13:40  
DD - Airspace  
Airspace modernisation

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

## Complaint

Dear Sir/Madam,

I am writing to you to give feedback on airspace modernisation as presented in your website <https://www.heathrow.com/company/local-community/noise/airspace-modernisation>.

As you will appreciate this issue raises many questions and concerns. I hope you can address them specifically and provide thorough and honest responses rather than corporate ones.

1. Your video on the website states the airspace modernisation will make “flight paths more **efficient**.” Can you list the success criteria that will define “**efficiency**” particularly with the impact on residents in mind, their health and well-being. This is a loaded word which needs clarification as this is such an important matter impacting on lives and well being. How will these criteria be measured and independently verified and assessed?

My growing concern is that it is the principle of accommodating the **growing demand for air travel** that will steer this rather than the threats to our climate and health. The balance of detail on these two components supports this impression. Please clarify.

Your document states, “ As an island nation, the UK relies greatly on the speed and global reach of air transport to keep us connected and provide the international access that we need for trade, business and tourism. Aviation in the UK has grown significantly in the last 40 years driven by globalisation, the growth in real incomes and a greater desire from the public to travel abroad. **The aviation sector now adds around £20bn a year to the economy and enables tourists arriving to the UK by air to add a further £21bn.** ” (Upgrading UK Airspace)

Can you comment on this letter attached below which takes issue with such contentions:

2: You state that modernisation will **reduce the impact of noise on communities**. Please can you explain how noise on communities is currently assessed? How is data gathered for areas with no noise monitor? Precisely what data will be used to plan modernisation and how will this be externally validated?

My area has been subject to persistent high decibel disturbance in excess of your 57dB average noise contour limit with growing regulatory and increased noise disturbance both day and night on both easterly and westerly operations since 2019. Increasing year on year.

I have repeatedly asked for noise data related to specific flights and exposure to noise over the course of a day/night (as flights are often inadequately spaced, flights that are so low markings clearly visible and identification obvious). Yet such information has not been provided. This is concerning. Our area is some distance from noise monitors yet information requested on noise measurements has not been shared. Our own measurements taken with a dB monitor records exposure throughout the day to dB levels consistently in excess of 60dB. The other issue is the accuracy of data collection. Webtrak is supposedly accurate yet observations of flight trajectory in our area contradicts that shown on Webtrak. The NPRs are over 3km wide so an aircraft can appear on track but be in significantly different position in the sky. If you enlarge the Webtrak map the discrepancies against alignment to the NPR are more obvious. Most importantly Webtrak does not capture the noise disturbance being caused for overflown communities.

How is Heathrow collecting the data specifically for my postcode presently? The accuracy of data is vitally important with airspace modernisation picking up pace.

How **will** this information being used to plan airspace modernisation?

How is Heathrow working with other airports to capture the impact on overflown communities?

One of your design principles is : Seek to avoid overflying the same communities with multiple routes including those to/from other airports

One of your design principles is: Provide predictable and meaningful respite to those affected by noise from Heathrow's movement

What is the success criteria for measuring progress towards these aims? What statistics will be used? Who will verify these statistics?

I have great reservations about these principles listed below:

Keep the number of people who experience an increase in noise from the future airspace design to a minimum

Keep the total number of people who experience noise from the future airspace design to a minimum

What exactly does this mean? Noise disturbance was not an issue in Walton On Thames until approximately 2019. Since it has at times become unbearable. There is no noise monitor. As I have stated, I have repeatedly asked for data. None has been forthcoming. Can you provide this data?

Again how will this be measured? How will this be verified? Is Walton presently being set up to bare the brunt of these increased flights?

This principle concerning **PBN** is highlighted clearly.

The introduction of Performance Based Navigation (PBN) is key to achieving airspace modernisation.

Yet a great deal of controversy surrounds it. It may be efficient but what impact will this have on residents? I asked in a recent phone call if this has been trialled and was told this has not been the case. World wide PBN has been controversial. I refer you to this document from Hacan. <https://hacan.org.uk/?p=78408>

How will PBN be trialled, independently verified and feedback taken on board?

Your publication states, "Aviation traffic forecasts from NATS suggest that commercial air transport will grow by around 2% a year in the UK, from 2.25m flights in 2015 to 3.25m flights in 2030. These forecasts do not include the

additional flights that might be generated by a third runway at Heathrow Airport that is planned to go live around 2025.” (Upgrading UK Airspace)

How is this forecast compatible with the necessity to reduce flying to **meet the net zero target**? This one of the design principles: To..

Reduce the contribution to climate change from CO2 emissions and other greenhouse gas emissions arising from Heathrow’s aircraft activities

My concern is that this will not be enough given the evidence recently with Heathrow recording the highest UK temperature. In April 2021, however, the Government announced that international aviation and shipping (IAS) emissions would be included in the UK’s climate law, requiring these sectors to be part of the UK’s 2050 net zero emission target. Again, what are the criteria to measure success?

I draw your attention to this research: <https://www.aef.org.uk/what-we-do/climate/> This states, “Aviation has consistently fallen through the nets of most global climate policy initiatives.”

Frankly I hope you can answer the questions above and provide detail that is lacking from the publications. Can you outline the impact for Walton On Thames? The devil is always in the detail. It is imperative residents know the precise impacts before decisions impacting on their lives and well being are made without consultation and without feedback from consultation being used to make decisions. The impact of noise pollution on health and wellness appears not to be mentioned? Yet the negative impact on health and wellness is well researched.

Yours faithfully

[Redacted signature]

**From:** DD - Airspace  
**Sent:** 17 August 2022 11:43  
**To:** [REDACTED]  
**Cc:** DD - Airspace  
**Subject:** Re: Airspace modernisation

Dear [REDACTED],

Thank you for your email re our plans for airspace modernisation. We are still at an early stage of the airspace design process but I have answered each of your questions based on work and plans to date.

### 1. Assessing impacts of airspace modernisation

Heathrow's current departure and arrival procedures were designed decades ago, at a time when aircraft and navigation were much less sophisticated than today. Through the introduction of airspace modernisation at Heathrow, the airport will make use of modern navigation technology to enable better aircraft performance, reduce delays and manage traffic in ways that mitigate, where possible, the impact on local communities.

Heathrow will also play its part in delivering the requirements of the UK's Airspace Modernisation Strategy, such as maintaining and enhancing high aviation standards, ensuring the efficient use of airspace, avoiding flight delays by better managing the wider airspace network, and improving environmental performance by reducing emissions and noise impacts on local communities.

The "efficiency" of different flight path options will be assessed as we develop, evaluate and shortlist design options. We are following the Civil Aviation Authority's (CAA) airspace change process (known as [CAP1616](#)) which requires us to be transparent about the various impacts (positive and negative) of each design option, with consideration for local communities as well as for airlines and passengers. Information on the impacts of the potential flight path changes will be available at a public consultation once we reach Stage 3 of the process. This is likely to be in 2024/25.

Heathrow is capped at 480,000 air traffic movements (departures and arrivals) per year. Prior to the COVID-19 pandemic, Heathrow was operating close to the cap at an average of 99% of the cap between 2015 and 2019. Our current plans to do not include a change to the current cap and we would need to make a separate planning application if we wished to increase the cap at any stage in the future.

The letter you attached appears to query whether the UK's hub airport would be better located elsewhere: this is a matter for Government and was considered within the work undertaken by the [Airports' Commission](#), which concluded that additional runway capacity would be best located at Heathrow. Our plans for expansion were put on pause to allow the airport to fully recover from the effects of COVID-19.

### 2. Assessing noise impacts

For many communities aircraft noise is a series of discrete noise events, varying in noise level and frequency of occurrence, and spaced out over a part or all of a day, with daily, weekly and monthly variation. Consequently measuring noise, describing its impacts and describing change are inherently complex. There are a range of metrics which are used to describe aircraft noise and to inform policy. The most common international measure of noise is the LAeq (often shortened to Leq) which means 'equivalent continuous noise level.' Most policy is based on the Leq metric because, based on current research, it has

proven to have the best correlation with associated health outcomes such as annoyance and sleep disturbance.

In the UK, daytime aircraft noise is typically measured by calculating this average noise level in decibels (dB) over 16 hours (07:00-23:00) during the summer period to give a single daily figure. As these Leq 16hr contours have been used in the UK for over 30 years, they allow historic trends to be monitored. Noting that research on health impacts is usually based on Leq metrics, we acknowledge that some people find it difficult to relate the concept of 'average noise over a day' to their own individual experience. We have been working for a number of years, and most recently through the Noise and Airspace Community Forum (formerly the Heathrow Community Noise Forum), to expand the use of supplementary and event-based metrics that better reflect individual experiences of noise following feedback from community members.

The outcomes of this work can be seen in our annual Noise Contour Reports which present data with a wide range of historic and new metrics, as well as our Community Noise Information Reports using data from our noise monitors located in community areas. These reports include the longstanding average noise level metrics, but are supplemented by other noise metrics that reflect the number of aircraft noise events above a specific sound level (e.g. 65dBA Lmax), as well as westerly and easterly only contours, and other information such as overflight maps and flight path usage statistics. The reports can be found by visiting: <https://www.heathrow.com/company/local-community/noise/noise-reports-and-statistics/reports>

The choice of location of noise monitors and their on-going deployment in community areas is described in our Noise Action Plan. Some monitors are placed strategically to enforce noise limits for departing aircraft and fines are issued to airlines for breaches. Prior to the pandemic we published an annual noise monitor deployment plan and we responded to community requests for monitors. However, our community noise monitor deployment plans are temporarily on hold due to the impact of COVID-19 on our operations. We are in the process of reviewing our monitoring strategy and the systems we use to publish the information, but we do not intend to deploy any new monitors in 2022.

WebTrak is our on-line application that allows people to see and track flights showing the aircraft type, flight number, speed and altitude, as well as the noise levels detected on our network of over 52 noise monitors. For data processing reasons and accuracy, the data is delayed by approximately 20 minutes. Data relating to aircraft position and altitude is passed to the application directly from NATS. The accuracy of this data has been independently checked and verified in a 2016 analysis carried out by the Netherlands Aerospace Centre (NLR). Heathrow made a commitment to repeat the study if or when Heathrow made a major change to the noise track keeping infrastructure, which has not occurred since that time.

For more information on the points covered above, please refer to our Noise Action Plan by visiting: <https://www.heathrow.com/company/local-community/noise/making-heathrow-quieter/noise-action-plan>

With specific reference to airspace change, Heathrow will work with surrounding airports and airfields to assess the cumulative impact of flight paths on local communities. The Airspace Change Organising Group (ACOG) has been set up by Government and the CAA to coordinate the introduction of airspace modernisation across airports, and to ensure cumulative impacts are understood by the airports and by the local communities. Detailed information on this will be available at the public consultation at Stage 3 of the process.

As you know, one of our design principles is to "Seek to avoid overflying the same communities with multiple routes including those to/from other airports". We will need to demonstrate how we have considered this principle in developing our flight path options, both for public consultation and within our airspace change proposal (ACP) submission to the CAA.

### **3. Performance Based Navigation**

The Government's Airspace Modernisation Strategy (AMS) relies on the introduction of PBN across UK airports. Heathrow therefore needs to introduce PBN to meet its commitments to the AMS. We understand that narrower flight paths due to the introduction of PBN is a concern to some local communities, which is

why Heathrow is committed to working with residents, local stakeholders and the aviation industry to find ways to realise the benefits of PBN, while seeking to limit negative effects from aircraft noise.

Our design principles to 'provide predictable and meaningful respite' and to 'keep the number of people who experience an increase in noise to a minimum' are both intended to address the concerns we have heard from local communities regarding the more precise flight paths that PBN facilitates.

#### **4. Reducing CO2 emissions**

Like every other part of the global economy, aviation needs to reach net zero emissions by 2050. In February 2022, we published our refreshed Sustainability Strategy in which we set out the steps we are taking to achieve absolute cuts in our carbon footprint by 2030. Our Sustainability Strategy 2.0 sets out the steps Heathrow will take to reduce carbon from flying through ongoing efficiency improvements, sustainable aviation fuel (SAF), zero carbon aircraft and carbon removal projects.

Our design principle to 'Reduce the contribution to climate change from CO2 emissions and other greenhouse gas emissions arising from Heathrow's aircraft activities' ensures that our airspace modernisation proposal is consistent with this and reflects the priorities of many of our stakeholders.

#### **5. Public consultation**

As mentioned above, the CAA's airspace change process requires us to consult on proposed flight paths with local communities. At the consultation we will share the proposed flight paths and their impacts on all local communities, including Walton on Thames. We will welcome community feedback at this stage.

Please let me know if you would like me to add your name and email address to our stakeholder list, to ensure you are informed about the future public consultation.

Kind regards,



**From:** [REDACTED]  
**Sent:** 17 August 2022 14:56  
**To:** DD - Airspace  
**Subject:** Re: Airspace modernisation

You don't often get email from [REDACTED]. [Learn why this is important](#)

**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 this speedy and detailed response. Much appreciated. Though challenging at an early stage, you have clearly tried to address the issues raised. Thank you for acknowledging the issues surrounding overflown communities. It is reassuring that Heathrow will work with other airports.

I still have a few comments or matters that need elaboration.

#### **Feedback on the Website**

You have asked for feedback on the airspace modernisation page on your website. I imagine this will be an ongoing facility. I was unable to complete this on your online form as a message came up stating the feedback was too long. Please can you elaborate on the character limit for this? It states that feedback will not be responded to so how will this feedback be assimilated into the airspace modernisation dialogue?

#### **Noise Impact on residents**

To us this is the crux of the matter and there are standing issues here that need to be addressed if trust with local residents, presently at an all time low, is to be nurtured.

Whilst I appreciate these plans are at an early stage, you have asked for feedback on these principles underlying modernisation. You will obviously empathise that this is a worrying time for residents especially those here in Walton as the impact of noise is a worrying and increasing trend.

“Efficiency” is a word used often but it needs to be further defined with regard to noise impact on residents. This is a crucial omission if this word is to be used extensively. What does this mean in terms of noise impact or is this term entirely related to flight paths? How will noise impact be measured for the purposes of modernisation? “Through the introduction of airspace modernisation at Heathrow, the airport will make use of modern navigation technology to enable better aircraft performance, reduce delays and manage traffic in ways that mitigate, **where possible, the impact on local communities.**” Will the balance be equitable with all four objectives as you have qualified the latter as highlighted?

You state, “ Information on the impacts of the potential flight path changes will be available at a public consultation once we reach Stage 3 of the process. This is likely to be in 2024/25.” Will this be an open ended consultation? What I mean here is that if residents are unhappy with potential flight paths is there still potential for these to be altered? Or is it fait accompli, which option do you prefer? It’s imperative that residents are consulted at the formative stage or this detracts from the very essence of what a consultation is. I have felt the last consultation I attended to be like this.

## Webtrak

Residents do not feel that Webtrak is an accurate trajectory of flight paths and adherence to the NPR. This needs to be acknowledged and another review of this planned before any data from it is to be used to evidence present noise statistics, adherence to tracking paths and airspace modernisation. I have shared frequently with Heathrow discrepancies. These are not explained to date but the corporate message of accuracy reiterated. Others feel the same. 2016 is six years ago. Air traffic has increased, legislation and monitoring procedures changed. What about noise metrics for areas like Walton who have no noise monitor? What noise metrics will be used to ensure Walton is equitable with other areas? Our perception in Walton is that aircraft are exploiting this gap in monitoring.

Is this present cap on air traffic movements protected as one of the principles of modernisation? What guarantees are there that this will not be increased?

Access to noise data is not easy for residents to tap into. I am acutely aware of the information you included re noise as it's widely available on the CAA and Heathrow websites. The devil is in the detail here and it is important that residents have access to a transparent range of noise metrics presently unavailable:

1. Heathrow's noise contour maps have not been updated on the website since Summer 2019. Walton has never had a community noise report. When will this information be updated? Will there be community noise reports to update noise data?
2. Daily Operational Data is frozen in time at May 31 2022. When will this resource be available? It would be much more effective if this was actually **daily operations data** and not a months in arrears as it is at best. Residents want to consult such data daily to compare this with the impact of operations on their own well-being and experiences.
3. xPlane website states, "xPlane allows you find out information about air traffic above your location. To do this we need some information." I'm trying to get this information but some data isn't loading. It shows only the number of operations ?
4. The HCNF minute meetings are so delayed and consequently much has moved on before theses are made public. July's meeting notes are not yet available.
5. Since the disbandment of HCEB, a highly respected organisation, an independent voice monitoring Heathrow's operations has not existed
6. What role will CISHA have in this consultation? Obviously with the new Chairman not yet in office, it will be a while before Terms of Reference are in place and this organisation are ready to be a critical friend.
7. Flights overhead today measure well above 65dBA Lmax as evidenced with the attached readings for just an hour. This level of noise is still impacting. Readings reported frequently to Heathrow. I am aware that there are no plans to extend noise monitoring. This is very disappointing for residents in Walton, subject to damaging, high decibel disturbance currently unmonitored. Heathrow has failed to provide noise metrics for Walton both for specific flights and periods despite repeated requests. A disappointing and worrying situation. How can we be assured noise monitoring data will be equitable when this is presently not the case? I have experienced headaches and earaches for periods of high decibel disturbance similar to those shared with you below. Transparency and ease of access to data is a must if trust in this air modernisation consultation is to be in tact.
8. In the past, Heathrow used to publish details of climb performance infringements in the quarterly Airspace and Noise Performance Reports this has ceased. Yet despite the pandemic Gatwick continues to do so. Access to such data for residents is important especially as there is currently a suspicion that aircraft are climbing more slowly.
9. Will the LAeq noise metric be revised as this as reliable noise metric has been disputed by reliable bodies such as ICCAN in their Review of the Survey of Noise Attitudes 2014?

I would be immensely grateful if you could let me have any thoughts on the above. Thank you once again for your considered response. Please do add my name to your stakeholder list. Thank you for your time and thoughtful response to my email. Much appreciated.



DateTime: 20220817 dB: 79

12:58

Plane: a8f00e UAL17 United  
States

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DateTime: 20220817 dB: 75

12:56

Plane: 400774 BAW255 United  
Kingdom

---

DateTime: 20220817 dB: 77

12:54

Plane: ab6c08 DAL31 United  
States

---

DateTime: 20220817 dB: 75

12:49

Plane: 407799 BAW91C United  
Kingdom

12:56

Plane: 400774 BAW255 U  
Kingdom

---

DateTime: 20220817 dB

12:54

Plane: ab6c08 DAL31 Unit  
States

---

DateTime: 20220817 dB

12:49

Plane: 407799 BAW91C U  
...

DateTime: 20220817 dB  
13:40  
Plane: 406b4a VIR5C Unit  
Kingdom

---

DateTime: 20220817 dB  
13:05  
Plane: 40655d VIR45W U  
Kingdom

---

DateTime: 20220817 dB  
13:02  
Plane: aa6ccb AAL733 Un

DateTime: 20220817 dB  
13:55  
Plane: 400776 BAW25C U  
Kingdom

---

DateTime: 20220817 dB  
13:45  
Plane: abc651 DAL17 Unite  
States

---

DateTime: 20220817 dB  
13:43  
Plane: 4008b1 BAW84DM

**From:** DD - Airspace  
**Sent:** 30 August 2022 17: [REDACTED]  
**To:** [REDACTED]  
**Cc:** DD - Airspace  
**Subject:** RE: Airspace modernisation

Dear [REDACTED],

Sorry for the delayed reply – many of the team have been on leave.

I have provided a response to your follow-up questions below. Please note that this email address is intended for issues relating to future airspace modernisation and future airspace change – any queries regarding Webtrak or today’s airport operation should be addressed to [noise@heathrow.com](mailto:noise@heathrow.com)

I have added your name and contact details to our stakeholder list.

#### **Feedback on the Website**

The character limit for the feedback form on the website is 2000 characters. Feedback submitted via the website feedback form will be considered by the airspace design team. This feedback will also be included as evidence of our stakeholder engagement when we submit our airspace change proposal to the CAA. Emails sent to [airspace@heathrow.com](mailto:airspace@heathrow.com) will be treated in the same way, so you are welcome to use this email address to provide your feedback on our modernisation plans.

#### **Noise Impact on residents**

On our website we refer to “efficient use of airspace”. This is a requirement of the Government’s Airspace Modernisation Strategy and relates to their objective that airspace should be better designed to ensure aircraft can access the UK’s airports more efficiently than they do today, with fewer delays and less use of holding stacks.

When designing flight path options, we are seeking a balance between the various objectives (including airspace efficiency) and the design principles. We will be seeking to mitigate impacts on all local communities, but it is too early for us to say what the impacts will be for each individual community around Heathrow. This information will be available at our public consultation at Stage 3. The public consultation will allow all interested parties to have their say on our proposed option(s) at a formative stage and we will need to demonstrate that we have taken account of the feedback we receive.

#### **Webtrak**

I am sorry to hear you have concerns about the accuracy of Webtrak. I have passed these on to [noise@heathrow.com](mailto:noise@heathrow.com) who deal with complaints or queries relating to Heathrow’s current operation. I have also passed your email on to our Communities Team who manage the publication of data on today’s operation and the airport’s relationships with the representative groups you mention (HCEB, CISHA, HCNF).

Kind regards,  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 30 August 2022 18:16  
**To:** DD - Airspace  
**Subject:** Re: Airspace modernisation

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

Thank you [REDACTED].

Regards  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 15 September 2022 14:16  
**To:** [REDACTED]  
**Cc:** DD - Airspace  
**Subject:** Thanks

Hi [REDACTED]

It was lovely to meet you virtually this morning.

Here is a link to Heathrow's ACP on the CAA's Airspace Change Portal, as promised: [Airspace change proposal public view \(caa.co.uk\)](#)

You can also view information relating to the other UK ACPs on here.

We will be in touch over the next few weeks with an invitation to join us for our Stage 2A Stakeholder Engagement Workshops.

Many thanks,

[REDACTED]

**From:** [REDACTED]  
**Sent:** 20 September 2022 16:36  
**To:** [REDACTED]  
**Cc:** DD - Airspace  
**Subject:** RE: Thanks

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

Thanks [REDACTED] it was great to talk to you.

I will start taking a look and keep an eye out for the invite.

Thanks

[REDACTED]



**From:** [REDACTED]  
**Sent:** 08 November 2022 23:05  
**To:** DD - Airspace  
**Subject:** Airspace Modernisation Public Engagement Workshops

You don't often get email from [REDACTED] [Learn why this is important](#)

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Dear Airspace team,

I am writing on behalf of the Lower Sunbury Residents Association (LOSRA) and in response to the final article in the Autumn 2022 edition of the Heathrow Community Building. Our Association Committee Meeting this evening agreed that LOSRA should formally engage in the debate around future flightpath options, given our community's location not just beneath the current Compton departures route but also at the intersection of the H3 and H9 helicopter routes.

I would therefore like to register our Association's interest in the consultation process and would ask how our involvement can be arranged.

**With thanks and best wishes,**

[REDACTED]

Committee member, Lower Sunbury Residents Association (LOSRA: <https://www.losra.org/> )

*(sent from Outlook)*

**From:**  
**Sent:**  
**To:**  
**Cc:**  
**Subject:**

[REDACTED]  
18 November 2022 13:00  
[REDACTED]  
DD - Airspace; [REDACTED]  
Heathrow Airspace Modernisation Workshops

Dear [REDACTED]

Many thanks for expressing your interest in our recent airspace modernisation workshops. The timing of your correspondence meant that we were unable to accommodate your attendance, as the workshops have concluded and there are no further public engagement activities planned for this stage of the airspace change process.

Further information about Heathrow's involvement in the UK's national programme of airspace modernisation may be found at [heathrow.com/airspacemodernisation](https://www.heathrow.com/airspacemodernisation)

This webpage includes an online form that can be used to provide comments on any aspect of our plans for airspace modernisation at any stage of the process. We will continue to update this website with new information as we progress through the stages of airspace change.

We have now added LOSRA to our Airspace Stakeholder register, which means we will contact you as a known stakeholder group when future engagement activities are planned and we will invite you to participate.

In the meantime, another way to be kept up to date and to engage more regularly with Heathrow on topics such as noise, airspace or community issues is through our dedicated community forums.

Noise & Airspace Community Forum – we provide regular updates at this forum on our formal Airspace Change Proposal for airspace modernisation. For more information visit [heathrow.com/NACF](https://www.heathrow.com/NACF)

Local Community Forum – this forum addresses a wider range of topics that matter to local residents, beyond the scope of aircraft operations discussed at the NACF. For more information visit <https://www.heathrow.com/company/local-community>

Both forums have independent chairs and we welcome new members. Currently we don't have representation from community organisations in Sunbury, so you are most welcome to get involved.

Kind regards,

[REDACTED]

[REDACTED]  
Operational Impacts & Community Engagement Lead   
**Carbon, Communications & Communities**

m: [REDACTED]

# Heathrow ACP Stage 2A Community Engagement - Workshop Material

[Redacted]

Tue 29/11/2022 15:29

To: DD - Airspace <airspace@heathrow.com>

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

The London Borough of Bexley requests that you engage with us on Stage 3 of the process and keep us informed of progress of the scheme. Would you please include the following in any future correspondence and updates:

[Redacted]

Many thanks,

[Redacted]

London Borough of Bexley.

# FW: Heathrow ACP Stage 2A Community Engagement - Feedback Form Reminder

[REDACTED] (Director and Support) [REDACTED]

Wed 30/11/2022 09:59

To: DD - Airspace <airspace@heathrow.com>

Cc: [REDACTED]

You don't often get email from [REDACTED] [Learn why this is important](#)

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

Good morning,

Please could you add [REDACTED], copied, to your mailing list as the current recipient of these emails [REDACTED] left West Berkshire Council. Many thanks.

Kind regards,

[REDACTED]

---

[REDACTED] PA to Executive Director, Place  
West Berkshire Council, Council Offices, Market Street, Newbury, RG14 5LD  
[REDACTED] | Ext 2870 | email: [REDACTED]  
[www.westberks.gov.uk](http://www.westberks.gov.uk)

**From:** DD - Airspace  
**Sent:** 01 December 2022 10:39  
**To:** [REDACTED] DD - Airspace  
**Cc:** [REDACTED]  
**Subject:** RE: Heathrow ACP Stage 2A Community Engagement - Feedback Form  
Reminder

Dear [REDACTED]

We have amended our mailing list and will make sure we contact [REDACTED] in the first instance with future correspondence relating to airspace change at Heathrow. Thank you for letting us know.

Kind regards,

[REDACTED]  
Heathrow Airspace Team

**From:** DD - Airspace  
**Sent:** 01 December 2022 10:48  
**To:** [REDACTED]; DD - Airspace  
**Subject:** RE: Heathrow ACP Stage 2A Community Engagement - Workshop Material

Dear [REDACTED]

We have amended our mailing list and will make sure we contact the three email addresses below with future correspondence relating to airspace change at Heathrow. Thanks for letting us know.

Kind regards,

[REDACTED]  
Heathrow Airspace Team

**From:** [REDACTED]  
**Sent:** 03 January 2023 17:01  
**To:** [REDACTED] DD - Airspace  
**Cc:** [REDACTED]  
**Subject:** RE: Letter re flight path over Holly Lodge Centre, Richmond

[REDACTED]  
Thanks [REDACTED] [REDACTED] and Happy New Year!

We have added these contact details to our stakeholder contact list.

Thanks,  
[REDACTED]

-----Original Message-----

**From:** [REDACTED]  
**Sent:** 03 January 2023 15:57  
**To:** DD - Airspace <airspace@heathrow.com>  
**Cc:** [REDACTED]  
**Subject:** FW: Letter re flight path over Holly Lodge Centre, Richmond

Classification: Internal

Dear all,

Please see this submission on airspace modernisation from Holly Lodge in a letter to the Heathrow Board Chairman, [REDACTED], on behalf of the Holly Lodge School.

Kind regards,  
[REDACTED]

The Holly Lodge Centre  
Holly Lodge  
Richmond Park  
Richmond, Surrey TW10 5HS

www.thehollylodgecentre.org.uk



a special place for learning

Chairman  
Heathrow Airport Ltd  
Nelson Rd  
Hounslow TW6 2GW

I understand that Heathrow has restarted the process of developing new flight paths that was stopped when Covid struck in March 2020, and that you are currently developing new flight path options that may include new flight paths coming over Richmond Park.

The Holly Lodge Centre is an education charity located within Richmond Park, which provides indoor and outdoor learning sessions, linked to the National Curriculum, for children from both mainstream primary and special needs schools, - and for adults with disabilities. We have three classrooms and a two-acre nature trail and have two schools visiting virtually every day during term-time. In total over 8,000 learners visited the Centre last year.

We specialise in serving schools for children with disabilities from across London, and are unique in being able to offer bespoke sessions for children and young people with learning difficulties, especially those with multiple and severe difficulties. Our outdoor nature trail is specially designed for people with disabilities and we use it year-round for learning sessions. We also have regular sessions of gardening for children with learning difficulties.

A large body of research evidence demonstrates that background noise negatively affects children's learning (e.g. Ghinst et al Journal of Neuroscience April 2019, Soderland et al 2010 etc). This detrimental affect is greater for children with disabilities – many of whom have sensory processing disorders. Large numbers of the autistic children we work with are extremely sensitive to noise

We are currently able to offer these children the benefits of learning outside the classroom, meeting and exploring nature in our tranquil nature trail. Many schools, particularly specialist schools for children with special educational needs and disabilities, have lost their outside spaces as their schools have expanded. Our nature trail allows some of the most vulnerable children in London to have the space to be, play and learn outside. Studies have shown that this can improve cognition, concentration and behaviour.



The Queen's Award  
for Voluntary Service

Royal Patron  
HRH Princess Alexandra  
48

Registered Charity: 1076741

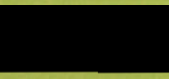
Registered as a Company limited by guarantee in England and Wales: 3663780



The Holly Lodge Centre  
Holly Lodge  
Richmond Park  
Richmond, Surrey TW10 5HS



a special place for learning



[www.thehollylodgecentre.org.uk](http://www.thehollylodgecentre.org.uk)

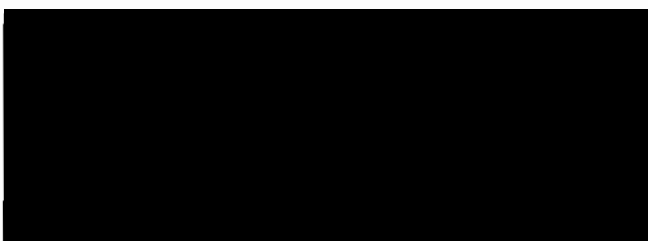
We already suffer sometimes with noise from aircraft flying just outside the northern boundary of Richmond Park and have to pause our outdoor nature trail activities when it occurs, and carefully monitor the reaction of some children.

If the new flight paths come directly across the northern part of Richmond Park, the noise levels in our classrooms and most importantly our nature trail will be hugely affected. It will become an unpleasant place for all our visitors, but in particular will become a stressful rather than peaceful environment for many of our autistic learners.

The Holly Lodge Centre relies on the peace and tranquillity of Richmond Park to provide its core services for the benefit of children, young people and adults - particularly those with special educational needs and disabilities. The Centre fits within the definition of a noise-sensitive place that should be taken into account in your proposals.

We therefore urge you to avoid flight paths over the Holly Lodge Centre to enable us to continue to operate and provide this important benefit.

Yours faithfully,



Chairman, The Holly Lodge Centre  
[www.thehollylodgecentre.org.uk](http://www.thehollylodgecentre.org.uk)

cc  Chief Executive, Heathrow Airport  
 Chief Executive, The Royal Parks



Royal Patron  
HRH Princess Alexandra  
Registered Charity: 1076741

Registered as a Company limited by guarantee in England and Wales: 3663780

**From:** [REDACTED]  
**Sent:** 01 March 2023 18:52  
**To:** DD - Airspace  
**Subject:** RE: Invitation to update on Airspace Modernisation at Heathrow: March 2023

You don't often get email from [REDACTED] [Learn why this is important](#)

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Thanks – can you send to this new email address as well in future? Appreciated - thanks

Best regards,

[REDACTED]



[REDACTED]  
Group Head of Economics and Regulation  
[REDACTED]

**From:** DD - Airspace  
**Sent:** 02 March 2023 09:48  
**To:** [REDACTED] DD - Airspace  
**Subject:** RE: Invitation to update on Airspace Modernisation at Heathrow: March 2023

Hi [REDACTED],

I have updated our records to include your new email address and we will send future airspace correspondence to both email addresses.

Kind regards,  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 02 March 2023 10:51  
**To:** DD - Airspace  
**Subject:** RE: Invitation to update on Airspace Modernisation at Heathrow: March 2023

You don't often get email from [REDACTED] [Learn why this is important](#)

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

Thanks!

Best regards,

[REDACTED]

**From:** [REDACTED]

**Sent:** Thursday, March 2, 2023 2:38 PM

**To:** DD - Airspace <airspace@heathrow.com>

**Subject:** RE: Invitation to update on Airspace Modernisation at Heathrow: March 2023

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

Hi [REDACTED]

I can't see the distribution list but you have previously spoken to/had the details of [REDACTED] [REDACTED] from our side in connection with this, as well as me. Could I request that [REDACTED] details are removed from anything to do with airspace developments as [REDACTED] has now retired from his position in the company dealing with these matters.

Many thanks

[REDACTED]  
Manager – Aeronautical Services and Air Traffic Management (ATM)  
Virgin Atlantic



**From:** DD - Airspace  
**Sent:** 03 March 2023 11:22  
**To:** [REDACTED] DD - Airspace  
**Subject:** RE: Invitation to update on Airspace Modernisation at Heathrow: March 2023

Dear [REDACTED]

Thank you for letting us know. I have amended the stakeholder distribution list to note that you are the Virgin point of contact for Heathrow's airspace modernisation correspondence, and I have removed [REDACTED] details.

Best wishes,  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 03 July 2023 08:25  
**To:** DD - Airspace  
**Subject:** RE: Invitation to update on Airspace Modernisation at Heathrow: Summer 2023

You don't often get email from [REDACTED] [Learn why this is important](#)

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

Hello.

Please can you amend your contact for Bracknell Forest Council please to;

[REDACTED]

[REDACTED] is no longer involved in the project.

Many thanks, [REDACTED]

Development Plan Team

**From:** DD - Airspace  
**Sent:** 03 July 2023 09:56  
**To:** [REDACTED]; DD - Airspace  
**Subject:** RE: Invitation to update on Airspace Modernisation at Heathrow: Summer 2023

Dear [REDACTED]

Thank you for letting us know. I have amended the stakeholder distribution list to note that the Development Plan Team's email address is the point of contact for Heathrow's airspace modernisation correspondence, and I have removed [REDACTED] details.

Best wishes,

[REDACTED]

[REDACTED] | Airspace Modernisation Programme



**From:** [REDACTED]  
**Sent:** 11 July 2023 10:13  
**To:** DD - Airspace  
**Subject:** Mailing list

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

Hi,

Please can I be added to the mailing list for this project.

Many thanks,

[REDACTED]  
Principal Planning Officer  
Planning Policy  
[REDACTED]

[www.midsussex.gov.uk](http://www.midsussex.gov.uk)

**From:** DD - Airspace  
**Sent:** 13 July 2023 17:04  
**To:** [REDACTED]; DD - Airspace  
**Subject:** RE: Mailing list

Dear [REDACTED]

Thank you for your email.

I will ensure you are added to our mailing list.

Kind regards,

[REDACTED]

[REDACTED]  
Airspace & ATM Engagement Specialist

**Heathrow**

**From:** DD - Airspace  
**Sent:** 14 July 2023 17:15  
**To:** [REDACTED]  
**Cc:** DD - Airspace  
**Subject:** Response to Airspace Modernisation Questions

Dear [REDACTED],

Thank you for sending through the below questions via [REDACTED]. Please accept our apologies on the delayed response to them, we only recently received your questions from [REDACTED]

*I would be grateful if you could ask Heathrow to update the NACF on their position in relation to these new, curved, low arrivals flightpaths. In particular:*

*1. Why are these flightpaths being considered? Heathrow is not increasing its ATMs as a result of airspace modernisation. In addition, they are likely to meet with opposition from communities, especially if they have not previously been overflown, have been overflown at higher altitudes or the flightpaths are used early in the morning.*

Heathrow has committed to playing its part in the Government's Airspace Modernisation Strategy – the national programme to modernise and upgrade the UK's airspace. A key part of this strategy is the use of Performance Based Navigation (PBN), which improves the accuracy of where aircraft fly by using modern satellite navigation. We are therefore required to design new PBN flight paths for both departures and arrivals. CAP1616 requires us to generate a 'comprehensive list of options'. Therefore, we are exploring all possible flight path options at this stage, including use of advanced PBN technologies that allow aircraft to join final approach closer than they do today.

We know that the use of PBN for arrivals will not deliver the level of throughput Heathrow required during the core period of the day, when the airport is very busy, so we therefore expect vectoring of arriving aircraft to continue during these busy times. However, PBN arrivals all the way to the runway could be used some of the time, and the narrower swathes associated with these arrivals may enable us to offer respite to some overflown areas.

However, we do understand that narrower flight paths due to the introduction of PBN is a concern to some local communities so we are exploring ways to mitigate the potential impacts of PBN through our new airspace design.

*2. Will these flightpaths operate at certain times of the day only and if so, when?*

We anticipate that PBN arrivals could be used during some periods of the day, but they will not be the core arrival concept, which remains vectoring, like today.

Our PBN Arrival options have been assessed for operations during 0430 and 0600, as this period is reflective of times that PBN Arrivals might be used.

*3. Will they carry a full flightpath's worth of ATMs or are they intended as some sort of relief mechanism for early mornings and to clear backlogs at other times (like IPA)?*

We are currently at an early stage of the ACP process and we don't yet know how the potential routes might work together. At Stage 3 we will develop system options (arrivals and departures that operate together, for both Easterly and Westerly operations) and we will develop the operational practices and concepts that specify how and when different flight paths might be used.

*4. Will such flightpaths operate entirely independently or could they operate alongside other arrivals as "parallel arrivals" ie like IPA?*

See response to Q3 above.

*5. Any other information Heathrow can share with us about these proposed new arrivals flightpaths would be welcome.*

We recognise that some community stakeholders have concerns about some of the PBN arrival options. We will take this feedback into consideration when developing system options. We will share progress updates on the evolving system options with the NACF during Stage 3 and will seek to mitigate and minimise any potential negative effects of PBN arrival routes through both the design of routes over the ground and the operational concepts associated with the use of these routes.

If you have any other questions, please feel free to contact us directly at [airspace@heathrow.com](mailto:airspace@heathrow.com).

Kind regards,

[Redacted]

[Redacted]  
Airspace & ATM Engagement Specialist