APPENDIX C - FEEDBACK RECEIVED

LUTON AIRPORT

Good afternoon

As a NATMAC member thank you for giving me the opportunity to comment on the design principles for your slightly steeper approaches, all of which make absolute sense.

My only concern, and this is directed at the CAA and not HAL, is that it seems absolutely ridiculous that you are having to go through the full CAP 1616 process for something as simple and straightforward as this. It creates a huge amount of unnecessary work for you but will also take up time with the CAA where they already have a huge backlog of ACP's. It doesn't make any sense at all.





London Luton Airport Navigation House Airport Way, Luton Bedfordshire, LU2 9LY

BRITISH HELICOPTER ASSOCIATION

Thank you for sight of the Design Principles and the BHA has no comment.

Good luck with your ACP 'light'.

Yours



British Helicopter Association

DELTA AIRLINES

For my part, I agree with the design principles at outlined without modifications. Best,

Delta Air Lines

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

By email only

Tuesday, 18 June 2019

Dear

Re Slightly Steeper Approaches

Thank you for the opportunity to provide feedback to the above. I have set out below the feedback from HCEB for your attention. As I am on leave from the weekend, I am doing this ahead of the date you have stipulated. If I receive any further feedback for when I return, I will let you know.

General

1. Are there any environmental impacts of SSA and if so, have they been considered? Environmental impacts can include whether SSA creates additional pollution or noise in other locations.

2. HAL should consider references to the feedback that communities have given to aid transparency. We would suggest something similar to the 5 bullet points on page 3.

3. Reference is made to "local communities have supported the trials", does this mean that there are communities that are not local who have not supported the trials?

4. Where you refer to stakeholder groups under the table of consultees does this refer to those in the table? Are local communities considered to be part of this stakeholder group?

5. Will any communities experience negative effects from what is proposed? If so, which communities and how?

6. Is there scope for a review of SSA should issues become apparent at a later stage?

Specific

• This seems to be a straightforward proposal apparently supported by evidence of widespread support from both the community and other stakeholders.

• The technical details behind the short document are beyond our expertise and that of most lay people so we would suggest that HAL considers whether or not their assessment should be peer reviewed.

• The design principles seem good and we must assume that none are incompatible – if not what if steeper flights did reduce Heathrow's capacity - which design principle would have priority?

- Are the design principles ranked in order?
- Will you be switching from ILS to RNAV?

I look forward to hearing from you

Yours sincerely

3

WINDSOR & MAIDENHEAD

As described in the overview of the trial only 2% of the aircraft were able or adhered to the 3.2 approach. The heavier and noisier long haul aircraft are unable due to aircraft approach performance and the infrequency of pilots using Heathrow, (which is understandable).

These aircraft of course land over Windsor from 4.30am onwards to 6am, and up to midnight, in excess of 18 hrs per day whilst on easterly operations, with no respite, which is afforded to westerly operations.

Heathrow have failed to abide by their own successful planning application to use departures on the current northern runway. An examination of the latest cgi (18th June) shows no additional taxiways, which Heathrow state are now required to use 09L for departures.

Therefore, the 3.2 approach is no significance to residents west of Heathrow, or those under the proposed third runway, where landing approaches will be 200' lower over Eton in the RBWM Regards

Eton & Castle Ward

MOD Good afternoon,

Thank you for the information on slightly steeper approaches at Heathrow. The MOD does not foresee any impact and has no comment on this specific ACP.

Thanks, Regards

| Defence Airspace and Air Traffic Management |

CAA Aviation House | Gatwick, RH6 OYR |

QATAR AIRWAYS

Having reviewed the proposal from Heathrow in reference to steeper than standard approaches we provide the following feedback and recommendation.

The promulgated approaches only provide a minimum temperature. Due to temperatures above standard inducing Barometric Altimeter errors resulting in steepening the approach paths, it is the opinion of the Technical Pilots that these approaches should be restricted to temperatures of 30°c and below. This will result in the Flight Path Angle (FPA) being less than 3.5°.

Best Regards

(Qatar Airways)

BRACKNELL FOREST COUNCIL

Good afternoon

Bracknell Forest Council welcomes the opportunity to comment on the use of slightly steeper approaches (3.2° instead of 3°) at Heathrow Airport in certain conditions.

We support the proposed design principles as explained, and have no amendments to propose or suggestions to make in respect of them.

We note that there will be another opportunity to comment in the summer of 2020, when we understand more detail will be available on these changes.

Yours sincerely

GAA

Dear Sir/Madam

Thank you for consulting with the General Aviation Alliance (GAA) and seeking early feedback on your design principles for steeper approached at LHR.

The GAA is an independent group and partnership of organisations representing, as far as possible, UK General Aviation (GA), and Sports and Recreational Aviation interests (S&RA). Its objective is to promote and protect the cost-effective use of GA and S&RA aircraft, and their owners, pilots and the associated operations, and to actively participate in the formulation of regulations and actions that may affect their interests so as to ensure the welfare and the free and safe movement of these aircraft, pilots, owners and the associated operations.

We welcome the opportunity to comment on your design principles within the CAP1616 airspace change proposal (ACP). We remind you that you are required to identify, and engage with, local General Aviation stakeholders, including air sports, who will allow you to develop these principles into Options to consult further on.

We are at a challenging point in the development of UK Airspace: the Airspace Modernisation Strategy (AMS) has not as yet considered the needs of lower airspace and we remain very concerned that the CAA has yet to lay down minima, methodology and guidance on how overall airspace safety is assessed, and then incorporated into its decision-making process. We are also responding at a time when the Government is consulting on a green paper that is related to airspace and e-conspicuity. Either of these may ultimately reveal a more dynamic approach to the airspace re-design which might provide some mitigation as your option appraisal develops.

As an Alliance we have reminded the Government that overall airspace safety is the primary responsibility of the Regulator and we want a more co-ordinated approach to airspace where it has significant national infrastructure implications.

We hope you are able to develop your design principles to encompass those we believe reflect the needs of General Aviation in the UK which are stated below in no particular order of priority or relevance;

ACP Principles

• An assumption that GA including sporting and recreational aviation is entitled to continued safe use of airspace and that commercial aviation does not have a right to limit airspace access

• Sponsors must show how they are integrating their proposal within the overall UK airspace modernisation context (for example, proposals which do not connect efficiently between upper and lower airspace (potentially under different airspace "management") would only inhibit overall airspace efficiency and therefore not receive our support)

- Reiteration that the UK airspace's default classification is G
- Reiteration that Class E airspace default is without the addition of a TMZ or RMZ

• Expectation that data used, particularly forecasts, will be verifiable including details of any and all assumptions

• Proper validation of forecast traffic levels

• Proper analysis of overall airspace safety changes, ie based on modelling and evidence rather than purely subjective opinion.

• Minimum size of controlled airspace

• Steeper and continuous climbs and descents for cost and environmental benefits as well as minimisation of CAS footprint

• Use of Class E airspace as an alternative to class A, C or D airspace

- Optimisation of the development work above and below the 8,000ft NATS en-route split.
- Flexible use of airspace including interoperability with existing e-conspicuity, eg FLARM and PilotAware
- Efficient consultation

We will encourage our members to provide a co-ordinated, but location specific responses, as this ACP develops as any change could have a significant impact for general aviation cross-country or soaring opportunities if not looked at in the whole.



GA Alliance 8 Merus Court Meridian Business Park Leicester LE19 1RJ

NATS

Dear

Thank you for engaging with NATS on the proposed design principles for Heathrow Slightly Steeper Approaches.

NATS Agree with the design principles as proposed

Proposed design principles

- 1 Must be safe
- 2 Must reduce the noise footprint of Heathrow's arrivals by enabling aircraft to stay higher for longer
- 3 Must not increase the numbers of go-arounds
- 4 Must not reduce Heathrow's capacity
- 5 Should not reduce the ability of arrivals to perform Continuous Descent Approach
- 6 Should maximise the number of aircraft able to fly the slightly steeper approach
- 7 Should not adversely increase pilot or air traffic control workload
- 8 Should not change the lateral tracks of aircraft over the ground

We have just one comment which is that the designs for the steeper approach procedures "should not adversely impact existing or planned deployments of technology and other airspace designs (such as independent parallel approaches (IPA), eTBS etc)". You could consider this as an additional design principle.

Best regards

NATS

THE HONOURY COMPANY OF AIR PILOTS

Responding to the questions posed in your Briefing Document:

We agree with your design principles, though would be less concerned with retaining exiting aircraft tracks – especially at the higher altitudes – if modification permitted more expeditious/reduced fuel burn arrivals.

We fully support the principle of using steeper approaches to reduce noise levels around an airport and recommended same to the Airports Commission. The only caveat is that assumes that they can be designed so the configuration/power settings needed to follow the steeper approach do not generate additional noise at lower altitudes.

Regards,



The Honourable Company of Air Pilots Air Pilots House 52A Borough High Street, London, SE1 1XN

HACAN

We support these proposals. We believe they are beneficial to residents and feasible for airlines to operate.



BALPA

Thanks for your email.

I am a member of BALPA's air traffic services specialist group, and on behalf of the group I'd like to submit a few points of feedback about the new RNAV approaches at Heathrow.

While we have no objection to the design of the approaches, nor to having them made permanently available, there are a few operational points to consider.

- The difficulty of flying an RNAV approach is generally higher than an ILS for any aircraft type. Some, such as the 777, have quite involved procedures. The increased workload will correlate to slightly higher level of errors and/or unstable approaches. The success rate will be slightly lower and more go arounds may result. We don't think it is fair to claim that there are "no operational dis-benefits".

- The segment between minima and touchdown is generally flown manually and visually. This challenging phase lasts significantly longer on the RNAV than the ILS, there is less vertical guidance and often more horizontal realignment required. This slightly raises risks eg of runway excursion and again makes more go arounds are likely.

- Generally speaking, the RNAV approach is easier if as much of it as possible can be flown via the published waypoints, rather than via radar vectors. The 320 family for example, is not authorised to fly direct via the final descent point, rather needs to fly via the previous published waypoint.

- Speed keeping is likely to be worse (160kts to 4d) for two reasons. Rightly or wrongly, pilots will note the slightly steeper slope and slow down sooner than they would on the ILS. Secondly errors caused by the lack of a relevant DME may cause pilots to miss their configuration gates. This could be incorrect use of the LON DME, or not setting up and using a suitable bearing/distance fix to the threshold (where aircraft type allows).

- RNAV approaches depend on barometric data, therefore on cold and/or high pressure days the gradient will be less than 3.2°, and may well actually be shallower than the 3° ILS and hence noisier. I suggest you consider a minimum temperature for routine use of the RNAV for noise reasons.

- In hot and/or low pressure conditions, the gradient is steeper. This makes slowing down the aircraft harder, and you can anticipate worse speed keeping and more go arounds due to unstable approaches.

- There are genuine operational reasons why an ILS is safer and more appropriate in some circumstances, such as marginal weather, training or when carrying technical faults. Hence we are keen that the ILS is always available on request even when ATC are using the RNAV approaches preferentially. Pilots should remain free to decline the RNAV approach without penalty.

In short:

- expect slightly lower performance from arriving aircraft in terms of speed control and approach stability

- please maintain the availability of the ILS at all times and allow pilots to request it freely.

Yours.

HCNF MEMBER

As requested, Here are my comments.

• you agree or disagree with any of the design principles proposed above, Agree

 you would like to make any amendments to our proposed design principles, No

and

• there are any other design principles that you would like to suggest.

No one not currently overflown by landing aircraft should be overflown as a result of this change.

Regards,



Dear

RICHMOND HEATHROW CAMPAIGN

On behalf of Richmond Heathrow Campaign I am happy to support the Design Principles set out in HAL's Briefing Document of 10 June 2019. However, I would like to suggest an additional Principle. Our concern is that when using the steeper approach, potentially aircraft speeds could be higher and there may be a need to slow the aircraft with use of landing gear and/or flap-down. The noise could actually increase on the ground, notwithstanding the additional height. This could especially be the case with a tail wind and with curved approaches on IPA.

I am not sure what the solution to this risk is. Perhaps a Principle could be added that the Noise impact must be less than on a 3 degree approach throughout the landing approach. Or perhaps the Principle could refer specifically to a landing gear and flap down rule but I rather thought that at the moment there is no such rule that can be enforced.

I would appreciate if you could let me know what HAL's thoughts are on this issue and whether you will add a Principle to deal with the matter.

Kind regards

Richmond Heathrow Campaign

LUFTHANSA GROUP

We agree with the design principles for the slightly steeper approaches into LHR. The only thing I can mention is that our A320 is not able to perform an autoland on a 3.2° glide path. We are limited to 3.15°

The Airbus 220 is able to perform an autoland until 3.25°.

Kind regards

ZRH AO/PC-A Lufthansa Group Austrian Airlines, Lufthansa, SWISS | Brussels Airlines, Eurowings

CAA

From: Sent: 24 June 2019 13:52 To: DD - Airspace <airspace@heathrow.com> Subject: LHR slightly steeper approaches (OFFICIAL)

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

Classification: OFFICIAL

Nice originally had 3.25 deg glide slopes on RWYs 04. However, this led to early gear selection and noise complaints from Cap Antibes. Hence the angle was reduced to 3.00. However, RWYs 04 are used with up to 6 kt tailwind which may be a factor.

Regards

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Feedback for the slightly steeper approaches - design principles:

1. British Airways agrees with the design principles set out. We are pleased to see that the top priority remains safety. We also wish to emphasise that operational resilience should not be compromised by this design proposal.

2. We have been active in trialling the steeper approaches via RNAV. In general, we had no major issues with crews flying these approaches. We did have several comments from crew. These were reference to fact that although the RNAV approach was flown at 3.2 deg, the PAPIs still gave an indication for a 3 deg approach, when the crew reverted to the visual aspect. This would no doubt be solved if the approach was permanently set at 3.2 deg and the PAPIs aligned alike.

3. It is mentioned in your document that some aircraft types cannot fly an ILS autoland approach at 3.2deg. In fact, our A318, A320ceo and the A321ceo are restricted to a maximum glideslope of 3.15 deg for autoland. We would therefore like to know how Heathrow would propose to enable these aircraft types to fly an autoland approach? We would not be in favour of two separate ILS approaches, with different glideslopes to facilitate. In addition, it was disappointing that many of the communities did not perceive any real benefit in the small noise reduction observed in the results. Another concern from British Airways is, by producing a slightly steeper approach, crews could configure the aircraft earlier, ensuring they meet the stable approach criteria. This would be especially the case if they experience a tailwind during the approach. We have and continue to work extremely hard to provide a low power/low drag approach philosophy. It would be disappointing for these benefits to be eroded, with the extension of gear/flap earlier, to mitigate the slightly steeper approach. As such, this should be considered in the final design.

Kind regards,

- Flight Operations British Airways

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I have reviewed the design principles for the Slightly Steeper Approaches ACP. My only comment relates to the potential to increase the number of unstable approaches. If you consider this aspect is covered by the principle that there should be no increase in the number of go arounds (not all UA lead to a go around but still increase the risk of a runway excursion) then the principles appear sound. However, you might wish to make this explicit, which will be of relevance to the pilot community for the next consultation phase.

Kind regards

UK Flight Safety Committee

DELTA AIRLINES

From: Sent: 28 June 2019 22:41		
To:		
Cc:		

I apologize for the late reply but I wanted to be sure that I took the opportunity to review the August 2016 "3.2 Slightly Steeper Approach Trial Report" report before responding.

Delta supports the design principles proposed and all of our aircraft operating to Heathrow are capable of conducting 3.2 glide slope approaches.

The August 2016 report however brings forth some comments which I don't think were ever addressed in completion, unless they were provided in another document that I have not seen. I think they are important enough to mention here for possible further review and analysis.

From the report:

- ATC reported a reduction in the number of requests for 3.2° RNAV approaches when there was a tailwind. Consideration should be given to any impact that a slightly steeper approach would have on the ability for crews to accept a tailwind on arrival.
- This trial has not provided evidence as to the effect of 3.2° approaches during poor meteorological conditions. It is unlikely that 3.2° ILS approaches would create any adverse impacts to Heathrow's operation for those aircraft that can perform CAT II/III approaches at an angle of up to 3.2°. Potentially, 3.2° CAT II/III ILS landings could have a small impact on Runway Occupancy Times which is worthy of consideration.
- The majority of the analysis carried out compares the differences between the 3.2° slightly steeper RNAV approach and the existing 3° ILS approach. However, there are several subtle differences between ILS and RNAV approaches, such as the final approach joining point and the effect of temperature on Baro-VNAV approaches. Therefore, some of the findings from the trial are as a result of comparing RNAV approaches to ILS approaches and not just specifically 3° to 3.2° approaches.

- On average, across all runways and aircraft types, the 3.2° RNAV arrivals are joining final approach 1.27 NM closer into the threshold than the 3.0° ILS arrivals. The analysis most likely compares RNAV arrivals to ILS arrivals, rather than 3.2° to 3.0° approaches specifically. The change is therefore a symptom of RNAV approaches being put on their own navigation to the Initial Fix, instead of positioning by ATC vectors onto the ILS localizer
- There did not appear to be any unintended consequences as a result of the 3.2° steeper approaches however, a marked increase in the numbers of RNAV approaches does have a direct impact on ATC workload.

Thank you for the opportunity to provide comments.



From: Sent: 25 June 2019 23:06 To: DD - Airspace <<u>airspace@heathrow.com</u>> Subject: Slightly steeper approaches – design principles

WINDLESHAM SOCIETY

Windlesham Society response to Heathrow Proposal to introduce slightly steeper approaches

The Windlesham Society is a relatively new member of the HCNF, having officially joined in 2019. As a result, we have not been party to workshops or discussions on the introduction of slightly steeper approaches and are, therefore, unable to comment in detail at this time.

However, we are in support of any safe proposal which will reduce noise and environmental pollution for the millions of people in London and the South East who are currently overflown by planes arriving and departing at Heathrow.

On this basis, we are generally in agreement with the proposed design principles outlined in your brief as shown below, with the exception of item 2. We feel that design principle 2 should aim to reduce the noise footprint of each individual flight arriving at Heathrow rather than the overall footprint of Heathrow's arrivals.

In addition, we would like to restate our position that we cannot support any proposal which facilitates the introduction of IPA and PBN routes. Our views on this matter were submitted to Heathrow on 13th June and are included below for your reference.

Windlesham Society response to Heathrow IPA Workshop - 6th June 2019

The Windlesham Society opposed Heathrow's planned introduction of new IPA flight paths from May 2022 in our response to the recent Heathrow consultation which closed

in March 2019 - copy attached.

Following the HCNF Workshop on 6th June, we reiterate our total opposition to these new, lowlevel concentrated flight paths which will massively impact communities in Surrey Heath and elsewhere.

We believe that these proposed, low-level flights would result in a doubling of noise levels over parts of Surrey Heath and we are concerned about the impact of this on the health and well being of residents living under or near the proposed flight paths.

This is of particular concern as the proposed, low-level flight paths would be used intensively before 7am and so the increased aircraft noise would disturb the sleep pattern of residents, which is well-proven to be injurious to health.

We have repeatedly asked Heathrow, as has **severe to be** for Surrey Heath and Secretary of State for the Environment, to confirm the extent of the increased aircraft noise. To date, Heathrow has been unable or unwilling to provide accurate details of the change in noise levels which could be expected.

In fact, no research or impact analysis has been published by the airport showing the environmental acceptability of these highly concentrated routes notwithstanding it is evident from the unplanned early termination of the 2014 PBN trials there will be an enormous public backlash.

We understand that Heathrow intends to implement this air space change in concert with the CAA regardless of public opposition and, in terms of establishing the new flight paths, is seemingly able to do so without any Government scrutiny under the governance system recently introduced for the CAA by the DfT.

It is difficult to understand why Heathrow should be permitted to implement this short term air space change to 'improve operational resilience' when it has such a detrimental impact on the health and well-being of UK communities and provides no significant benefit to the wider UK economy.

However, it may be significant that Heathrow has confirmed that the introduction of these proposed, low-level flight paths will be accompanied by a linked application under the DCO for 25,000 additional flights to be operated before a 3rd runway opens.

This short term expansion plan was not considered by the Airports Commission nor included when the ANPS was presented to Parliament. No economic case or environmental impact analysis has been produced by Heathrow to demonstrate the acceptability of this proposal.

The concern must be that this could be expansion 'by the back door'. It is easy to envisage a scenario in which, should permission for the third runway be delayed or refused, or simply become unfeasible or unfundable, Heathrow will be able to use these proposed, low-level routes to increase the number of Air Traffic Movements without any further Government scrutiny and without any of the investment costs of a third runway.

HCEB

From: Sent: 01 July 2019 12:53 To: Subject: Slighter Steeper Approaches

HI

Two more bits of feedback that I have produced in full.

"I'm in full agreement with the design principles and have nothing to add in terms of amendments or alternatives.

I have sat through two full technical presentations on the glide slope trials (both winter and summer conditions) and endorse the steeper approach angle. In addition, I've experienced the sound lab simulations and found the differences to noise appreciable.

These are the sort of marginal gains that combined with other improvements can make a big difference to people on the ground without any change to passenger comfort or safety."

"I wonder, is there any significant history of wind shear being experienced on short finals on any approach into Heathrow? A slightly steeper approach with consequently slightly less power on renders an aircraft more vulnerable to wind shear and less able to quickly recover."

Best wishes

Heathrow Community Engagement Board Ltd.

HCEB general phone line:

Postal Address: HCEB, PO Box 1590, BEDFORD, MK41 5BL



e: info@hceb.org.uk

w: www.hceb.org.uk

The Heathrow Community Engagement Board is an independently chaired body constituted to provide the functions of an airport consultative committee for Heathrow Airport (in accordance with Section 35 of the Civil Aviation Act 1982) and the functions of the Heathrow Airport community engagement board (as set out in the Airports National Policy Statement).

The Heathrow Community Engagement Board Ltd is registered in England. Company No: 11412280. Registered Office: c/o Suite 9, 30 Bancroft, Hitchin, Herts SG5 1LE

Additional NATS Feedback

------Forwarded message ------From: Date: Wed, 3 Jul 2019 at 16:10 Subject: SSA response To:

Hi

I got your voice mail thanks. Please feel free to discount my DP suggestion, I get that the proposed slightly steeper approach angle is basically a replication of the extant RNAV approaches and hence will not cause an issue with IPA etc. My suggestion was intended to ensure that different projects were aligned, and clearly you are!

Regards





St Martins Place, 51 Bath Rd Slough SL1 3UF Your contact: Email: <u>admin@heathrowstrategicplanninggroup.com</u>

Date: 4July 2019

Community and Stakeholder Manager – Airspace The Compass Centre Heathrow Airport Nelson Road, Hounslow TW6 2GW

Email only:

Dear

Slightly steeper approaches – design principles feedback request

Thankyou for the opportunity to comment, and for arranging for the additonal response time and opportunity for to discuss detailed queries (our email dated 24 June) with the of the airspace technical team.

We understand from the consultation document and this further discussion that:

a formal CAA approval process is now required to consolidate measures that are already being successfully trailed and enacted at Heathrow;

a single ILS system on each runway approach is currently set at around 3.0deg, and that use of a traditional ILS approach is the preferred choice of many aircrews and ATC because of the lower workloads to both;

most aircraft can also use a PBN (RNav) approach the minimum requirements for using each system differ;

that if IPA is implemented to, that these aircraft would use a PBN approach and these can then safely integrate with the main landing stream on the ILS approach;

the difference in approach height and noise reduction from this alone is small, on average the trial shows a saving of around 0.5dB. Whilst an even steeper approach means an aircraft is higher at a given point on the approach, it will need to deploy braking to limit control airspeed, which in turn creates turbulence and noise; and

otherwise, there are no negative implications.

Notwithstanding the limited impacts of this measure, HSPG do support this change and the approach adopted by Heathrow to achieve continuous improvement in procedures to achieve noise reductions. Whereas the slightly steeper approach has a small impact, in combination with other small steps such as

HEATHROW STRATEGIC PLANNING GROUP

admin @heathrowstrate gicplanning group.com

the relocation of the runway thresholds, the steps accumulate to achieve significant environmental and public health benefits.

Yours sincerely,



, Heathrow Strategic Planning Group

On behalf of the following HSPG member organisations:

- London Borough of Hounslow
- Slough Borough Council
- South Bucks District Council
- Buckinghamshire County Council
- London Borough of Ealing
- Spelthorne Borough Council
- Runnymede Borough Council
- Surrey County Council
- Thames Valley Berkshire LEP
- Bucks and Thames Valley LEP
- Enterprise M3 LEP
- Colne Valley Park CIC
- Elmbridge Borough Council
- · Royal Borough of Windsor and Maidenhead