



Andrew Boff AM

Chair of the London Assembly

City Hall

Kamal Chunchie Way

London, E16 1ZE.

Becky Coffin

Director of Communities and Sustainability

Heathrow.

Dear Chair,

Thank you for the opportunity to respond to Motion 3.1 of the 2 November 2023.

Airspace Modernisation is led by the Department for Transport and the Civil Aviation Authority ('CAA'), and is intended to deliver "quicker, quieter and cleaner journeys and more capacity for the benefit of those who use and are affected by UK airspace". It is a programme of national, regional and local importance, and a core part of Heathrow's approach to reducing carbon emissions and noise whilst improving punctuality and ensuring there is capacity to meet future demand.

Process and progress are regulated by the CAA, who issued [CAP 1616 "Airspace Change Process"](#). All sponsors in the airspace modernisation programme, including Heathrow, are required to follow CAP1616, which specifies activities and milestones to achieve airspace change. We are developing our Airspace Change Proposal ('ACP') to meet those requirements, and we submitted our ACP 'Stage 2' documentation in July 2023.

One of the core reasons for airspace modernisation is to reduce carbon emissions, and enable "quicker, quieter and cleaner" journeys. These goals are also at the heart of Heathrow's Sustainability Strategy, Heathrow 2.0. We are proud to be global leaders in the sector on carbon removal, sustainable aviation fuels and zero carbon flight.

Do Nothing/Do Minimum Option

The objectives outlined in the UK's Airspace Modernisation programme are intended to deliver benefits to those who use and are affected by airspace, which means that there can be no "do nothing" option. CAP1616 does not require a "do nothing" option, save for as a baseline against which proposals can be judged. We are fully compliant with CAP1616 on that point.

At this early stage in the process (Stage 2 of 7) we are required to explore all possible options. This has resulted in a long "shortlist" of options. We have not yet identified a "do minimum" option due to the early nature of our options.

At the next stage of the process, it will be possible to articulate which of the design options represents the minimum level of change compared to the baseline using more detailed analysis. We will continue to work with our community stakeholders during each of the milestones outlined in the CAP1616 process.

Our approach is consistent with that undertaken by other UK airports.

Richmond Park

Through community engagement, Richmond Park was identified as a specific area that should be avoided where possible. As a result, Heathrow has designed departure options that specifically avoid Richmond Park and included overflight of Richmond Park as a criterion against which the initial options were assessed. None of our Vectored Arrival options overfly the park (these are the arrival routes that will be used most of the time).

At Stage 3 of the process we will assemble full system options and refine proposed routes. We will seek to reduce potential overflight and/or impacts to Areas of National Beauty, National Parks and Richmond Park at this stage of the process.

Decisions on the final design of the airspace and utilisation of routes will not be made until we have reached the appropriate stage (3) to undertake detailed environmental assessment and fully consult local communities on our proposals. Therefore, the reference to "*60,000 aircraft flying only 1500-2000 feet above Richmond Park*" is misleading.

Noise

Heathrow operates under an annual Air Traffic Movement cap of 480,000 and this airspace change does not seek to increase that. Airspace Modernisation will consequently not involve a significant increase in the number of air traffic movements. Although still at an early stage, our plans for airspace modernisation do not involve a significant increase in the number of flightpaths or Londoners overflown by aircraft using the airport.

We are committed to being a good neighbour to the local communities that surround our operation. Through our Heathrow 2.0 sustainability strategy, we have committed to making Heathrow a better and healthier place to live and work, and have comprehensive plans in place to improve quality of life through cleaner air, quieter nights and taking care of our local environment. Heathrow is committed to maximising the benefits while minimising the negative impacts of our operation on our local communities. We have a long-standing record of providing leadership in managing noise and taking action towards net-zero.

Thank you for the opportunity to provide clarity on our evolving Airspace Modernisation plans. If any of the London Assembly members would like to discuss further, please do get in touch with us at airspace@heathrow.com.

Yours sincerely,



Becky Coffin
Director of Communities and Sustainability