

23<sup>rd</sup> February 2016

[REDACTED]  
Clerk to Senior Coroner  
Inner South District of Greater London  
The Coroner's Court  
1 Tennis Street  
London SE1 1YD

For the attention of Andrew Harris, Senior Coroner, London Inner South

**Response to Regulation 28 Report to Prevent Future Deaths  
– Peter Barnes & Matthew Wood 16/01/13**

Since the inquest the London Heliport has continued its correspondence with both CAA and DfT in order to provide information to progress consideration of official safeguarding of the London Heliport and assist them with implementation of AAIB report recommendation 2014-30.

On 4<sup>th</sup> January 2016 Abimbola Alli from DfT responded to my email of 10<sup>th</sup> November 2015, which formed part of the inquest documents I was asked to comment on during my witness testimony, by stating that the email, originally sent by way of providing information to support the London Heliport enquiry concerning consideration for an application, would in fact be treated as a formal application for official safeguarding whilst asking for further documentary evidence to support the application.

The DfT for their part of the assessment have set out the current guidance for official safeguarding of aerodromes and also the general arrangements for safeguarding whether official or not and also stated that they will need to understand the existing consultation/communication process between the London Heliport and the relevant local planning authorities. They would also consult the CAA and the Department for Communities and Local Government (the department with lead responsibility on planning policy) to determine what other measures, if any, are available to ensure that local planning authorities give due regard to safeguarding concerns from the London Heliport when granting planning permission.

At a meeting on 29<sup>th</sup> January with the London Heliport designated CAA Aerodrome Principal Inspector and in subsequent correspondence I have set out current requirements and guidance for notification to the London Heliport of planning applications. This process consists of an annotated map and accompanying guidance letter sent to all planning departments of the Local Government authorities which fall within the London Heliport safeguarded area in 2009. A pre-planning consultation arrangement is in place with the Port of London Authority for any works or development in the River Thames within 250 metres of the London Heliport landing platform which extends on concrete piling from the river wall over the tidal waters.

I have also provided to CAA information on the level of pre-planning consultation made by developers under current arrangements and the number actual planning applications upon which the London Heliport has been required to make comment or raise objections since the local authorities were advised in 2009. There have been 10 major projects during this time, including tall buildings, large-site projects with multiple buildings of mixed height, river piers and a modification to the Cremona railway bridge involving a cantilevered foot-bridge addition. All of these projects have been concentrated in the vicinity of the heliport and its air traffic circuit which extends approximately 1 kilometre in either direction along the River Thames from the London Heliport.

The most in depth work to date began in 2015 on a development (now approved) at 12-14 Lombard Road of a 90 metre tall building around 300 metres from the heliport located on the southern riverside. Due to its size and proximity to the heliport and its approach and climb-out areas along the river objection to the project involved insistence on in depth wind-tunnel, reflected glare and technical (including building lighting and impairment of radio communications) assessments at the additional expense of the developer since the planning application included only desk-based assessments. Due to the unofficial safeguarding status of the London Heliport there was no mechanism for referral of the planning application and heliport objection to the CAA who were also therefore unable to make comment. Following an extended consultation process the development was approved by the planning authority and the London Heliport made final comment that this building and others of similar height would have a cumulative effect on the operation due to the obscuration of line of sight between aircraft in the air and the heliport. Consultation on the obstruction lighting scheme is underway and yet to be completed.

There have also been adhoc consultations on schemes for obstruction lighting on tall-building projects mostly in the Vauxhall/ Nine Elms area as well as notifications of cranes across a wide area of London about once a week since early 2013 following the 16<sup>th</sup> January Vauxhall crash.

I have also discussed with CAA how the safeguarded area, currently centred on the London Heliport Air Traffic Zone with the main focus on the immediate approaches and climb-out area along the river front within the heliport "circuit", might be developed to reflect better the important routes where heliport traffic approaches and departs the London Heliport Air Traffic Zone. This could involve extending the coverage to include not only to the east and west along the heli-route structure where it coincides with the course of River Thames through London including the increasingly high-rise Vauxhall/ Nine Elms area but also away from the river directly to the north and south of the heliport. As part of this process I have also asked National Air Traffic Services to provide radar-plotted information which could assist with highlighting current traffic patterns and also asked to speak to the responsible department within National Air Traffic Services for safeguarding low-level air traffic over London.

I understand there may be a concern registered by the DCLG that if the safeguarded area for the London Heliport becomes too extensive it may view this as too onerous a responsibility in terms of notification and consideration. Whilst I understand this concern I would suggest there must also be a wider responsibility to protect users of the airspace other than London Heliport customers who use the same routes. I have stated our view that whilst the London Heliport itself does not wish to take on an excessively onerous safeguarding burden it is seeking to find a suitable balance in order to work with CAA, DfT, NATS and DCLG to find a solution.

In addition to liaising with CAA on the subject I have also set out in recent email correspondence with DfT at their request consideration with regard to the London Heliport application for official safeguarding in relation to current guidance.

Areas covered included:

1. Strategic Importance

- for routine government, diplomatic, military and Police and Air Ambulance use
- use in case of major emergencies (e.g. London bombings 2007, Marchioness Disaster) for Air Ambulance, Police, Military Security Services
- as a forward operating base for Police Air Support when Central London is a venue for state visits, ceremonial and public events which entail additional security or restrictions on use of airspace.

2. Technical safeguarding

As a landing site in inner London the London Heliport has the capability if required for technical support to the wider aviation community as an essential local link to National Air Traffic Services radar coverage for the local management of low-level helicopter air traffic in London. At the same time the London Heliport is also currently considering options for upgrade of its meteorological reporting capability under a Meteorological Office project to provide semi-automated online meteorological data available not only to aircrew of low-level air traffic across London (not currently available) but also as part of the same project to assist with London-wide fog forecasting for London Heathrow (and City) airports.

3. Physical Safeguarding

Given its key location in Central London the main areas for safeguarding London Heliport should cover:

- much of the Central London heli-route structure including areas at or beyond the limits of the London Heliport ATZ (e.g. Nine Elms/ Vauxhall), keeping in mind the tall-buildings zoning policies for any of the inner and central London boroughs including City of London Corporation especially where their boundary is river-facing since there are many tall riverfront (or near riverfront) buildings either consented or under construction in Central London (e.g. "No1 Blackfriars" on south side of Blackfriars Bridge)
- the London Heliport Local Flying Area (LFA) which operates as an autonomous (from NATS) extension to the south of the heliport ATZ.
- a zone of similar dimensions to the LFA but running to the north which although currently overseen by combined NATS and RAF Northolt radar services could also become a second semi-autonomous LFA. To this end we are currently under discussions with NATS to put in place contingencies in case of failure of the NATS radar service which have in the past either closed the London Heliport or severely limited its freedom to operate.

Whilst I would not argue that the London Heliport becomes solely responsible for the onerous task of safeguarding such a large area, I believe it would be a logical area within which CAA/NATS and London Heliport could work together with the DLGC to protect London-wide low-level helicopter and other fixed wing air traffic (since not all of it uses London Heliport). The focus for the London Heliport would be the area within and immediately adjacent to its ATZ, with a wider "on-route" and "off-route" responsibility passing increasingly to NATS and CAA further away from the London Heliport ATZ.

4. Current List of officially safeguarded aerodromes

This list includes many privately-owned important regional airports, including one which is currently closed and unlikely to ever re-open (Plymouth) and others such as Blackpool and Coventry which have come close to closure. Another, Carlisle currently has no commercial air transport operators. Also listed is Penzance which is now closed having been the only dedicated heliport facility on the list; it served the Scilly Isles until closure and transferral of the scheduled helicopter service to Lands' End Airport before this ceased to operate. There is a precedent therefore for safeguarding of a heliport in the public interest for commercial air transport operations (albeit not scheduled services) rather major aerodromes.

5. Future safeguarding arrangements under European Aviation Safety Agency (EASA)

A form of official safeguarding will happen through the statutory provision of aerodrome data which is part of the increasing scope of EASA law concerning all airports of a certain size and complexity which in time may also include heliports within its scope (this currently only

applies to aerodromes with a certain level of passenger throughput, runway length which also use radar). Given the pace of development of Central London and the number of tall buildings either under development or at the planning stage it seems expedient to not wait for this to become law in order to secure the future of the heliport facility and meet the recommendations of the coroner report into prevention of future deaths following the inquest into the Vauxhall helicopter crash on 16th January 2013.

6. A unique facility


The London Heliport is the only licensed Heliport in London. It was the foresight of Westland Aviation (now part of Finmeccanica-Agusta Westland), who as custodians of the post Second World War helicopter manufacturing industry, founded the London Heliport in 1959 to prove the viability of an urban business heliport. Thanks to its unique design combined with the flexibility of operation of helicopters and their continuing technical and safety developments, including new designs and technologies, the London Heliport remains a relevant, viable operation after 55 years of operation.

7. Review of current official safeguarding arrangements

Although the official safeguarding system may have been established after the Second World War when certain aerodromes were identified as being important for the national transport system, the process has now been extended to other sites, such as City Airport so it cannot be right to treat London Heliport differently and be excluded. The London Heliport has similarities in strategic importance with other aerodromes albeit in some case for slightly different reasons due to its specialisation as a facility for helicopters.

In conclusion the London Heliport remains committed to pursuing an officially safeguarded status and working with the aviation regulator (CAA/ EASA), local government (DCLG) and the on-route air traffic service provider (NATS) for the safeguarding of the London Heliport and the wider network of routes in the London area used by helicopter air traffic. The London Heliport is currently awaiting a response from the DfT to the case made above for official safeguarding.

Yours sincerely



Simon Hutchins  
Heliport (Accountable) Manager