

2026

re:shape

Aviation Impact Assessment

Ashley Park



Aviation Impact Assessment

Re:Shape T Ltd

Ashley Park

August 2026



ADMINISTRATION PAGE

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Issue	Date	Detail of Changes
1	07 August 2026	Initial issue
2	20 August 2026	Updated building heights and administrative revisions
3	28 August 2026	Administrative revisions

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EXECUTIVE SUMMARY

Report Purpose

Building developments have the potential to affect aviation operations in numerous ways. The most common impacts relate to buildings as physical obstructions and a cause for potential interference for both aircraft and wireless signals used for radar and radio systems, respectively.

Pager Power has been commissioned to investigate the potential impact of the proposed building development at the former Ashley Park site (the Proposed Development) upon aviation activity and infrastructure.

The formal planning Description of Development is outlined below:

Full planning permission for a phased mixed-use development comprising: (i) enabling works and operations; (ii) residential development (Use Class C3) including affordable housing; (iii) shared living accommodation (Sui Generis), (iv) commercial and community floorspace (Use Classes E and F2); and (v) site-wide and/or phase-specific access, servicing, public realm, blue-badge parking, cycle parking, open space, hard and soft landscaping, utilities, plant and all other associated works.

Assessment Results

Obstacle Limitation Surfaces (OLS)

The Proposed Development is laterally clear of the OLS for both London City Airport and London Heliport, and therefore does not impact the protected surfaces associated with either aerodrome.

Secondary Surveillance Radar (SSR) Impact

The Proposed Development is not within the line-of-sight of the SSR at London Heathrow Airport and is therefore not predicted to cause a technical impact.

Precision Approach Radar (PAR) Impact

The Proposed Development is not within line-of-sight of the PAR at RAF Northolt and is therefore not predicted to cause a technical impact.

Instrument Flight Rules

The Proposed Development is vertically clear of the Minimum Elevation Figure by 1,019 feet and vertically clear of the Area Minimum Altitude by 1,919 feet. Considering the Proposed Development is laterally clear of the OLS for London City Airport, its height and its distance relative to existing obstructions, the Proposed Development is not predicted to impact Instrument Flight Paths (IFPs) associated with London City Airport.

A detailed assessment of IFPs undertaken by an Approved Procedure Design Organisation may be requested by London City Airport. Consultation with the safeguarding teams at London City Airport is recommended to confirm their position.

Aviation Lighting

The Proposed Development measures a maximum of 77.46m above ground level and does not infringe the OLS of the nearest certificated/licensed aerodrome (London City Airport). A legal requirement for aviation lighting has not been identified for the Proposed Development.

The Proposed Development is located within the London City Control Zone (CTR) and therefore may require lighting if deemed necessary by London City Airport, although the Proposed Development is not considered to be in a sensitive area for operations associated with London City Airport. Lightning of the Proposed Development is not predicted to be required.

Crane Usage

It is considered likely that proposed cranes will require steady red medium-intensity aviation lighting for the crane tower and jib. The proposed heights and positions of the cranes should be identified as soon as possible so that a detailed IFP assessment can be completed, if requested.

Recommendations and Next Steps

Consultation with the safeguarding team at London City Airport is recommended in due course to confirm their requirement for a detailed IFP assessment.

The Civil Aviation Authority (CAA) should also be notified of the Proposed Development and any proposed cranes using the Airspace Coordination and Obstacle Management Service¹ (ACOMS) in advance of construction. The registration process is via the CAA customer portal to access the ACOMS service to submit a notification.

¹ <https://www.caa.co.uk/commercial-industry/airspace/event-and-obstacle-notification/crane-notification/>

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ABOUT PAGER POWER

Pager Power is a specialist technical consultancy based in the United Kingdom and has been providing independent expertise on planning issues for solar, wind, and building developments for over 20 years.

Established in 1997, the company initially specialised in assessing the impact of wind turbines on radar systems. Pager Power has since expanded into a multidisciplinary technical planning consultancy that offers a comprehensive range of services and has supported renewable and building projects in more than 60 countries.

Pager Power's core competencies now include:

- Aviation and Radar;
- Daylight, Sunlight and Overshadowing;
- Glint and Glare;
- Shadow Flicker;
- Telecommunications.

Using proprietary modelling software, each study is tailored to the individual project, ensuring that results are relevant, defensible, and aligned with current national and international standards. The company also provides planning support and stakeholder consultation across all service areas, helping clients to understand constraints, explore potential mitigation options, and forge a path forward for their projects.

Pager Power's work helps our clients identify potential risks, inform project design, and support the decision-making process, and can provide support at any stage of a project, from initial feasibility through to completion. Pager Power's assessments – recognised for their objectivity, accuracy, and technical integrity – are designed to withstand legal scrutiny and trusted by developers and stakeholders alike.

1 PROPOSED DEVELOPMENT DETAILS

1.1 Development Location and Details

Figure 1 below shows the site location plan² for the Proposed Development.

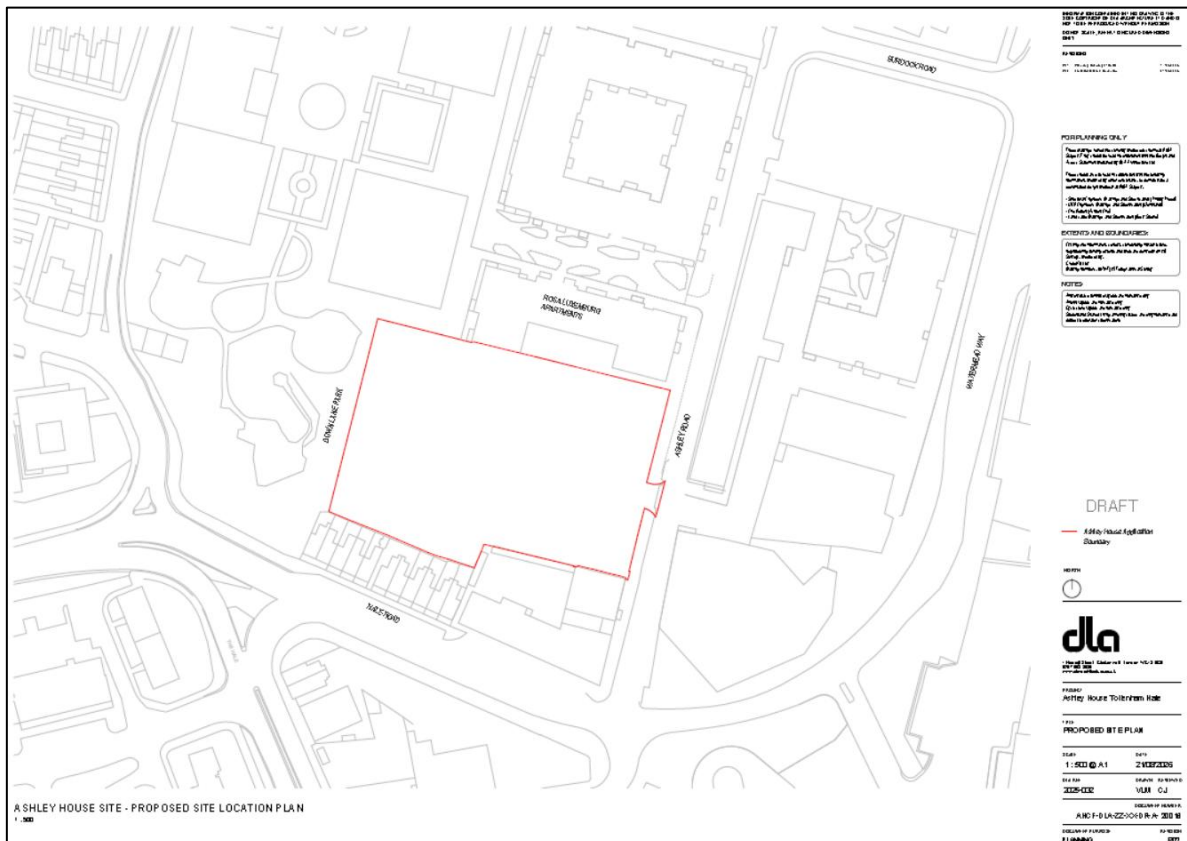


Figure 1 Site layout

The Proposed Development has been assessed by the following three distinct sections due to the differences in height:

- The Affordable Living block assessed at 32.205m above mean sea level (AMSL)³;
- The Shared Living tower assessed at 85.475m AMSL⁴;
- The Shared Living block assessed at 35.750m AMSL.

² Source: AHCF-DLA-ZZ-XX-DR-A-20016-PROPOSED SITE PLAN-P02

³ 6 storeys AOD

⁴ 23 storeys AOD

2 IDENTIFICATION OF AIRSPACE AND AVIATION INFRASTRUCTURE

2.1 Airspace

The Proposed Development is located in the London Flight Information Region (FIR), which covers England and Wales. FIR is managed by a controlling authority that ensures Air Traffic Services (ATS) are provided to the aircraft flying within it. The Civil Aviation Authority (CAA) is the controlling authority of the London FIR and NATS provides ATS in the region for en-route aircraft.

The Proposed Development is located within the London City Control Zone (CTR), which is Class D controlled airspace surrounding London City Airport, extending up to 2,500 feet AMSL.

2.2 Identified Infrastructure

Table 1 below summarises the identified aviation and radar infrastructure potentially impacted by the Proposed Development.

Stakeholder	Infrastructure	Distance from Proposed Development
London City Airport	CAA-certificated Civil Aerodrome	12.4 km
London Heliport	AIP-licensed Civil Aerodrome	15.60 km
London Heathrow Airport Secondary Surveillance Radar	CAA-certificated Civil Aerodrome ATC radar	29.8 km
Ministry of Defence RAF Northolt	Military Aerodrome Precision Approach Radar	24.4 km

Table 1 *Identified aviation and radar infrastructure risks*

Figure 2 on the following page indicates the location of the identified aviation and radar infrastructure relative to the Proposed Development.



Figure 2 *Identified aviation and radar infrastructure relative to the Proposed Development*

3 OBSTACLE LIMITATION SURFACES

3.1 Overview

The Obstacle Limitation Surfaces (OLS) are imaginary planes defined in three dimensions for physical safeguarding purposes (i.e., ensuring that physical structures do not present a safety hazard at an airfield). The size of the surfaces is dependent on the type of aerodrome, the number of runways, their physical dimensions, and the procedures carried out at the aerodrome. The OLS assessment has considered the protected surfaces associated with London City Airport and London Heliport.

3.1.1 London City Airport

London City Airport is a Civil Aviation Authority (CAA)-certificated aerodrome and has produced its own guidance with respect to the safeguarding of OLS. In 2004, the Aerodrome Standards Department, Safety Regulation Group Civil Aviation Authority produced a document outlining the surfaces for London City Airport. These surfaces substitute those outlined in Civil Aviation Publication 168. The threshold points for London City Airport have changed since this document was issued; however, the general concept of the surfaces remains pertinent.

The safeguarding area for London City Airport extends to 10km from the mid-point of the runway.

The basis for the elevations of each surface is the elevation datum of 4.95m AMSL (the elevation of the lowest landing threshold).

Since London City Airport produced this guidance in 2004, there have been some updates to the information. The following areas have been updated⁵:

- Threshold locations;
- Declared distances (most notably the TODA and the TOCS);
- Threshold elevations.

Figure 3 on the following page depicts London City Airport's OLS.

⁵ NATS AIP

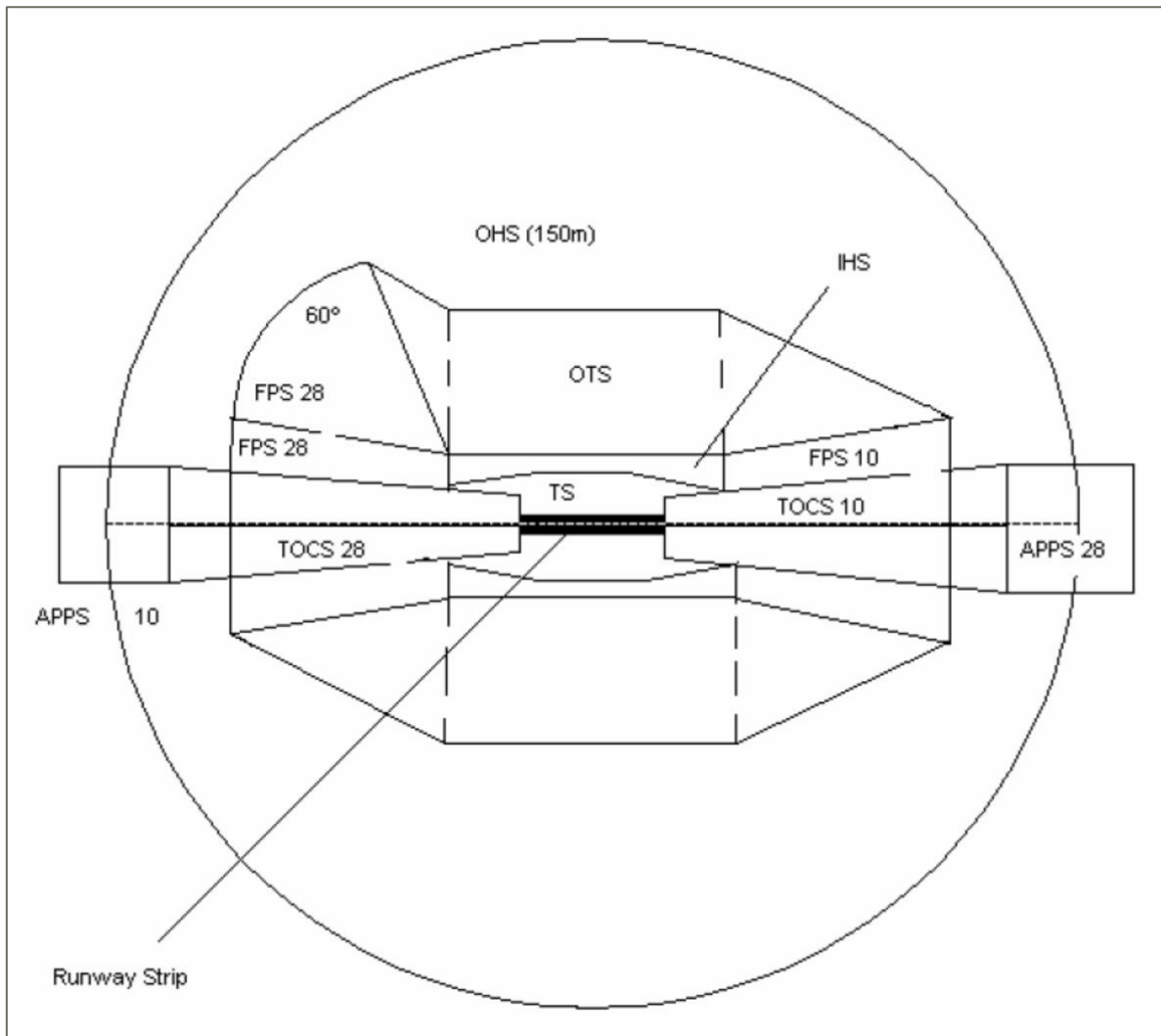


Figure 3 London City Airport's OLS

3.1.2 London Heliport

London Heliport is a licensed heliport. The dimensions and geometry of the surfaces are constructed based on detailed rules defined in the International Civil Aviation Organization (ICAO) Annex 14 Volume II pertaining to heliports. The following extract is quoted from Section 4.2.2 Annex 14. The applicable sections for London Heliport are formatted in green:

'Protected side slope

3.1.13 *A heliport shall be provided with at least one protected side slope, rising at 45 degrees from the edge of the safety area and extending to a distance of 10 m (see Figure 3-2).*

3.1.14 Recommendation.— *A heliport should be provided with at least two protected side slopes, rising at 45 degrees outward from the edge of the safety area and extending to a distance of 10 m.*

3.1.15 *The surface of a protected side slope shall not be penetrated by obstacles.*

...

4.2.2 The following obstacle limitation surfaces shall be established for a FATO at heliports, other than specified in 4.2.1, including *heliports with a PinS approach procedure where a visual segment surface is not provided*:

a) *take-off climb surface*; and

b) *approach surface*.

4.2.3 The slopes of the obstacle limitation surfaces shall not be greater than, and their other dimensions not less than, those specified in Table 4-1 and shall be located as shown in Figures 4-1, 4-2 and 4-6.

4.2.4 For heliports that have an approach/take-off climb surface with a 4.5 per cent slope design, objects shall be permitted to penetrate the obstacle limitation surface if the results of an aeronautical study approved by an appropriate authority have reviewed the associated risks and mitigation measures.'

London Heliport permits VFR traffic, as stated in the AIP. Therefore, the transitional surface, which requires a Point-in-Space approach with a visual segment, is not applicable for London Heliport.

The OLS assessment has considered an approach, take-off climb surface and protected side slope for London Heliport.

3.2 Assessment

3.2.1 London City Airport

The Proposed Development is laterally clear of the OLS for both London City Airport and London Heliport.

Figure 4 on the following page shows the OLS plot for London City Airport. The location of the Proposed Development is illustrated by the cluster of red crosses.



3.2.2 London Heliport

Figure 5 on the following page shows the OLS plot for London Heliport. The location of the Proposed Development is annotated.



Figure 5 OLS plot – London Heliport

3.3 Conclusions

The Proposed Development is laterally clear of the OLS for both London City Airport and London Heliport, and therefore does not impact the protected surfaces associated with either aerodrome.

4 SECONDARY SURVEILLANCE RADAR

4.1 Overview

Buildings, structures and terrain can all ‘interfere’ with Secondary Surveillance Radar (SSR). The level of interference normally depends on the size of the interfering structure and its distance from the radar. A larger structure closer to the radar is more likely to interfere than a smaller structure which is further away. Two forms of interference have been considered, which are outlined in the following subsections.

Heathrow Airport utilises two radar situated upon the metal lattice tower. The lower radar is a non-cooperative Primary Surveillance Radar (PSR), the taller is the co-operative SSR which has been assessed within this report.

SSR broadcast interrogating radio signals that are detected by aircraft with on-board transponders. The transponder responds by broadcasting a radio reply which normally contains identification and altitude information. The SSR determines the aircraft’s horizontal position from the direction the antenna is orientated, and the time taken to receive a response from the interrogation.

Both radar will be used by air traffic controllers to provide approach services to aircraft landing at and departing from Heathrow Airport. Both radar will also be used by air traffic controllers at national air traffic control centres to provide services to en-route aircraft.

The radar of significance with respect to the predicted impact is the SSR. The PSR is not expected to be affected.

4.2 Analysis Methodology

The following approach has been taken within this report:

- Radar line-of-sight assessment for the Proposed Development was assessed at the altitude of the highest point of each tower of the Proposed Development;
- A screening assessment was undertaken to determine whether existing buildings and/or intervening terrain would hide/shield the Proposed Development from the SSR;
- Consideration of the distance from the SSR.

Information regarding the methodology or additional line-of-sight charts can be provided upon request.

4.3 Assessment

A radar line-of-sight assessment has been completed from the Heathrow Airport SSR to the tallest section of the Proposed Development: the Shared Living Tower, presented in Figure 6 on the following page. The box labelled ‘certainty’ provides the distance (in metres) by which the Proposed Development is or is not within line-of-sight to the assessed radar (rounded to one decimal place).

Radar Line of Sight Calculation

London Heathrow Airport SSR

Coordinate	17
Result	HIDDEN
Certainty	28.1 metres

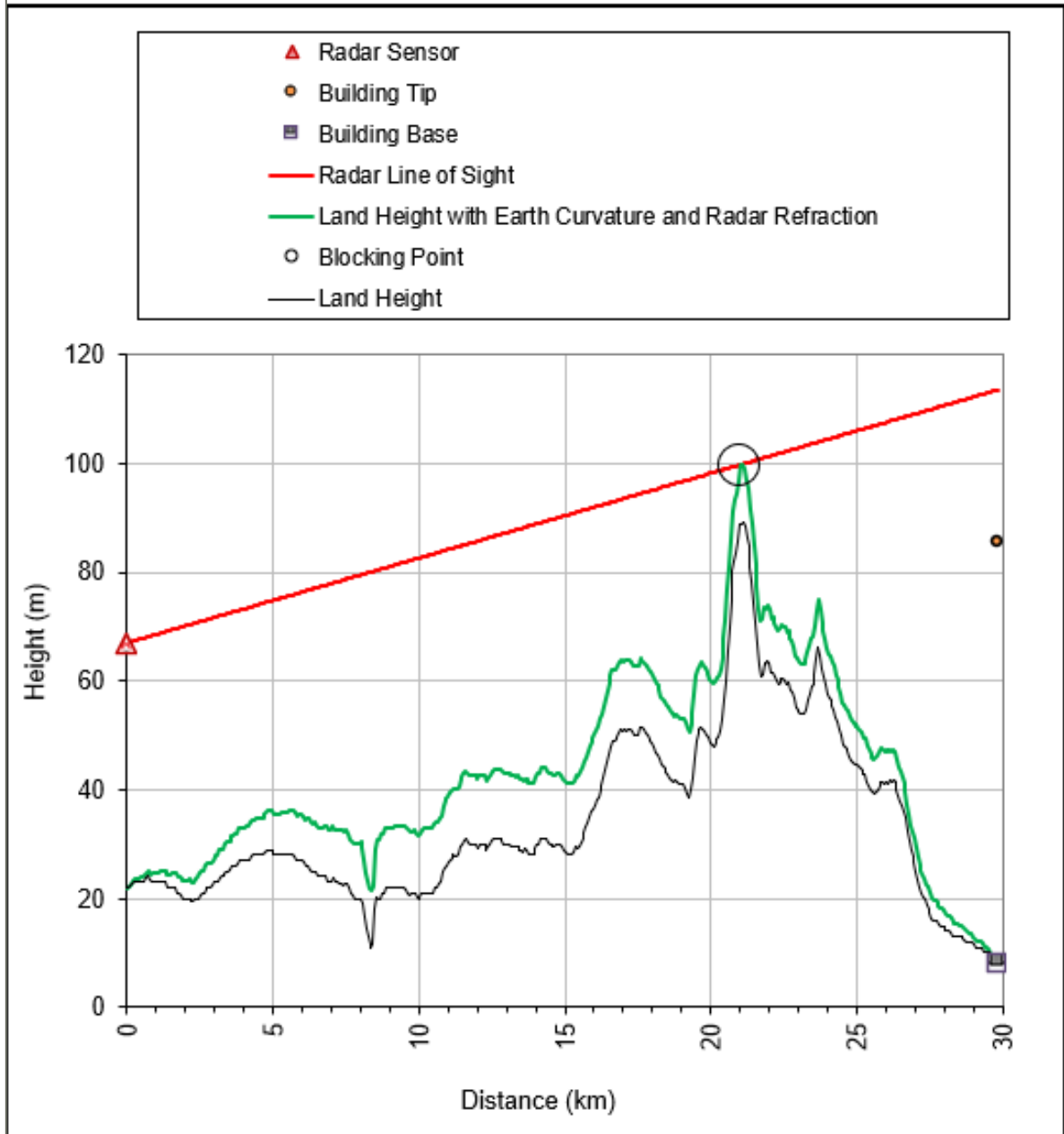


Figure 6 Line-of-sight chart for London Heathrow SSR

The chart shows that, based on bare-earth terrain, the Proposed Development will be hidden from the SSR at Heathrow Airport by a certainty of 28.1m. Any technical impacts, including shadowing and reflection effects, are therefore not predicted.

The SSR capabilities for reducing technical impacts are presented in Section 4.3.1 for completeness.

4.3.1 SSR Capabilities

The radar is fitted with a Large Vertical Aperture (LVA) antenna. It is a Mode S monopulse SSR supplied by Raytheon Systems Limited as part of a nationwide contract to upgrade NATS' national network of twenty sites.

The radar has a range of advanced built-in capabilities for increasing its reliability and performance. Specific features that reduce the radar's susceptibility to interference from buildings are listed in Table 2 below and on the following page.

Feature	Form of interference	How feature reduces interference	Additional Information
Integral Tracking Function	Reflections	More likely to determine return is genuine if it moves as an aircraft return is expected to.	Ensures good false target suppression.
Refined Algorithms	Reflections and Shadowing	Experience on many sites used to enhance performance.	Ensures good performance in complex environments.
Identification and rejection of false replies	Reflections	False returns are rejected	If two or more replies are identified from the same source all but the first is rejected.
Side Lobe Suppression	Reflections	False returns arising from antenna sidelobes are rejected	P1 and P2 pulses are used. This is an encoding system which enables sidelobe signals to be detected by comparing pulse sizes.
Sensitivity Time Control (STC)	Reflections	Removes reflections	Removes relatively low amplitude replies
Minimum Detection Signal Level (MDS)	Shadowing	Maximises radar coverage whilst minimising noise detections	-
Dynamic Threshold	Shadowing	Weak signals stronger than any interference signals are detected.	-
Reply to Reply Correlation	Reflections	Multiple replies required for target processing	Single reply reports are rejected.

Feature	Form of interference	How feature reduces interference	Additional Information
FRUIT ⁶ Rejection	Reflections	Track initiation only allowed if report contains two or more correlating replies in the same SSR mode	e.g. two or more Mode A replies
Track Processing	Reflections and Shadowing	Improvements are made in target location using history of target position.	Improvements made when confidence in location information is low
False Target Processing	Reflections	Advanced processing that applies a series of tests to identify and reject false returns	Techniques include: 1: Check whether Mode A code is unique 2: Check “known” reflection zones 3: Use geometric analysis for checking reflection zones 4: Self adaptive processing

Table 2 *Radar features for reducing interference*

4.4 Conclusions

The Proposed Development is not within line-of-sight of the SSR at London Heathrow Airport and is therefore not predicted to cause a technical impact.

⁶ FRUIT – False Replies Unsynchronized in Time.

5 PRECISION APPROACH RADAR

5.1 Overview

Precision Approach Radar (PAR) operate using two beams, one scanning horizontally and the other vertically. The returns from these beams are used to guide an aircraft in for landing. This process is essentially the combination of two two-dimensional radar, allowing it to effectively operate as one three-dimensional radar. Unwanted returns from wind turbines can impair the operation of a PAR.

PARs are only required to monitor aircraft as they come into land, and so they are safeguarded within a defined zone extending from the end of each runway. These zones are defined by an angle either side of the runway's extended centreline and a range, resulting in a cone-shaped safeguarding zone. This zone is defined by an angle of 20 degrees either side of the runway's extended centreline out to a range of 20 nautical miles (nm).

Figure 7 below shows the construction of a PAR exclusion zone. The blue outlined area shows the PAR safeguarded zone originating from the centreline of the runway perpendicular to the location of the PAR beside the runway. Note that the diagram is not to scale but is indicative only.

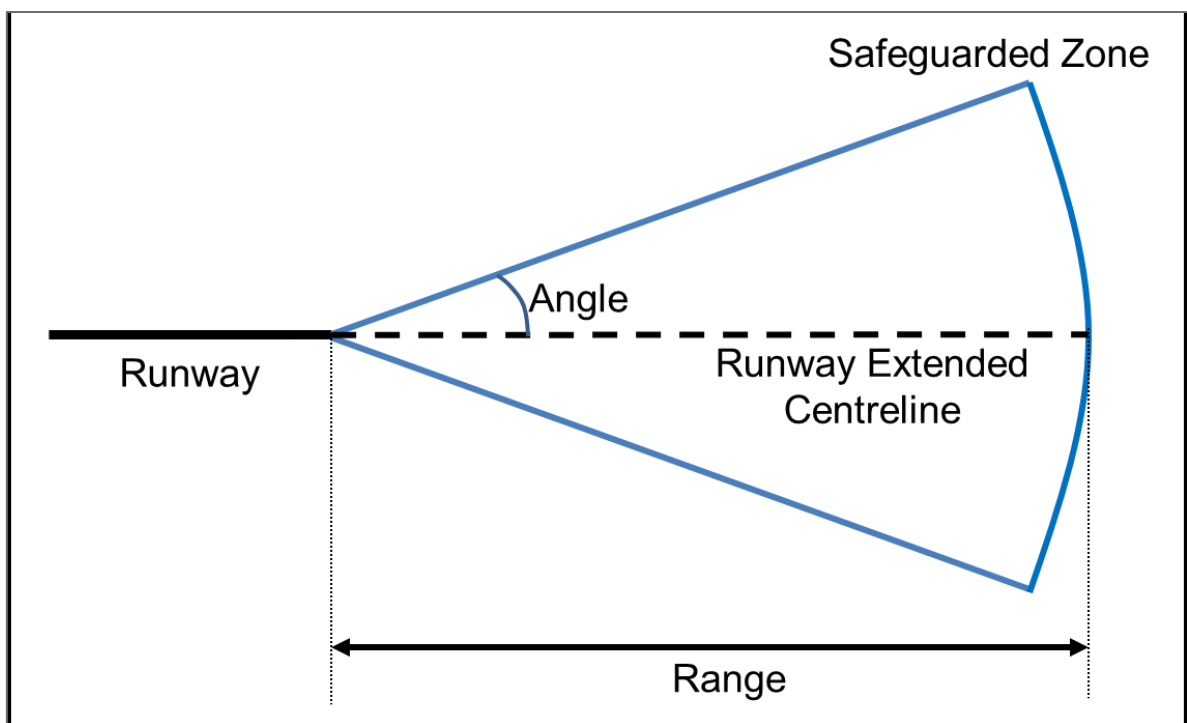


Figure 7 PAR safeguarded zone

Obstructions within this zone that are in the radar line-of-sight are likely to result in a sustained objection from the MOD.

The PAR associated with RAF Northolt has been assessed for the Proposed Development.

5.2 Assessment

Figure 8 below shows the location of the Proposed Development within the PAR safeguarded zone for RAF Northolt. Obstructions within this safeguarded zone are typically likely to result in an objection from the Ministry of Defence (MOD).

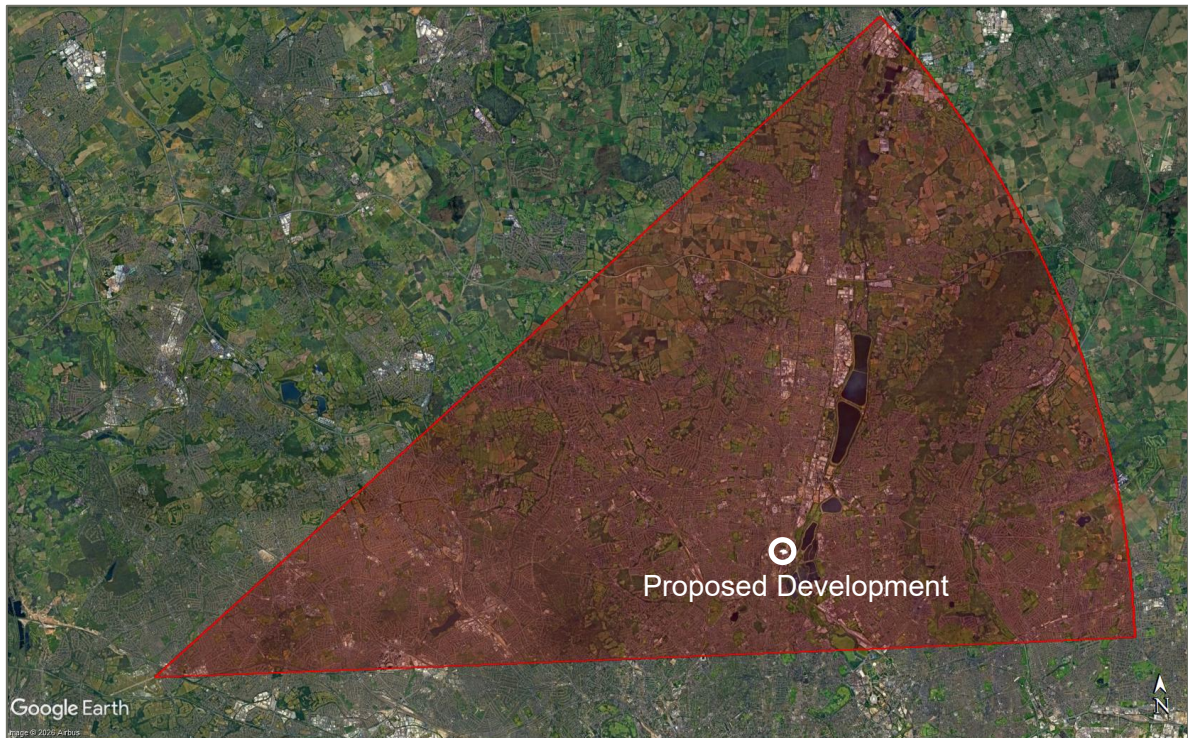


Figure 8 *Proposed Development relative to RAF Northolt PAR*

A radar line-of-sight assessment has been completed from the RAF Northolt PAR to the tallest section of the Proposed Development: the Shared Living Tower, presented in Figure 9 on the following page.

Radar Line of Sight Calculation

Northolt PAR

Coordinate	18
Result	HIDDEN
Certainty	164.2 metres

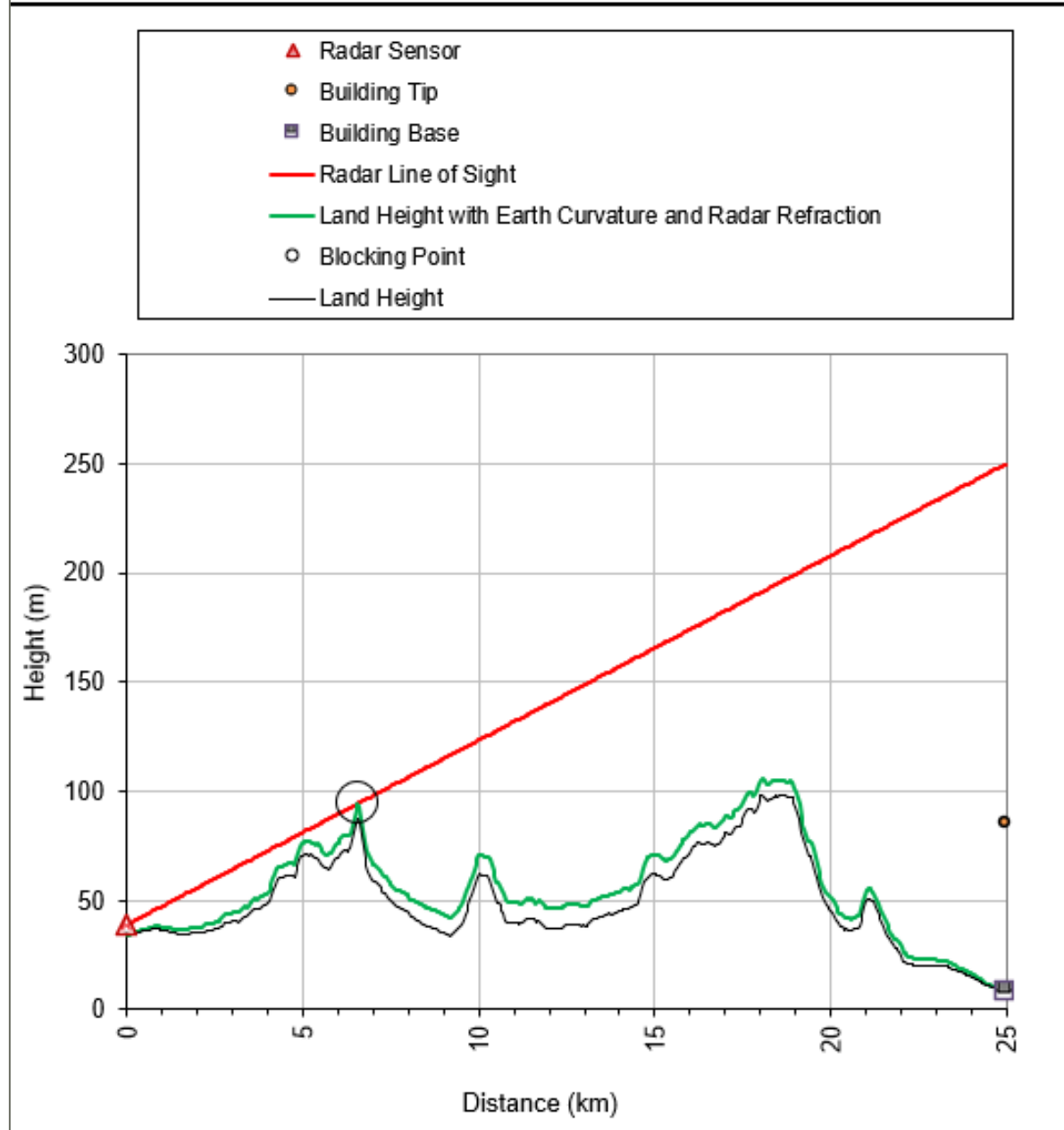


Figure 9 Line-of-sight chart for RAF Northolt PAR

The chart shows that, based on bare-earth terrain, the Proposed Development will be hidden from the PAR at RAF Northolt by a certainty of 164.2m. A technical impact is therefore not predicted.

5.3 Conclusions

The Proposed Development is not within line-of-sight of the PAR at RAF Northolt and is therefore not predicted to cause a technical impact.

6 INSTRUMENT FLIGHT PROCEDURES

6.1 Overview

Instrument Flight Procedures (IFPs) are published documents that consist of defined three dimensional routes for aircraft arriving and departing airports.

In practice, aircraft do not necessarily fly these routes exactly due to limitations on the performance of aeronautical instruments, pilots and variations in wind and pressure conditions.

This means that an area around and beneath these three-dimensional routes must be kept clear of obstacles to ensure that there is no significant collision risk to aircraft flying these procedures as shown in Figure 10 below.

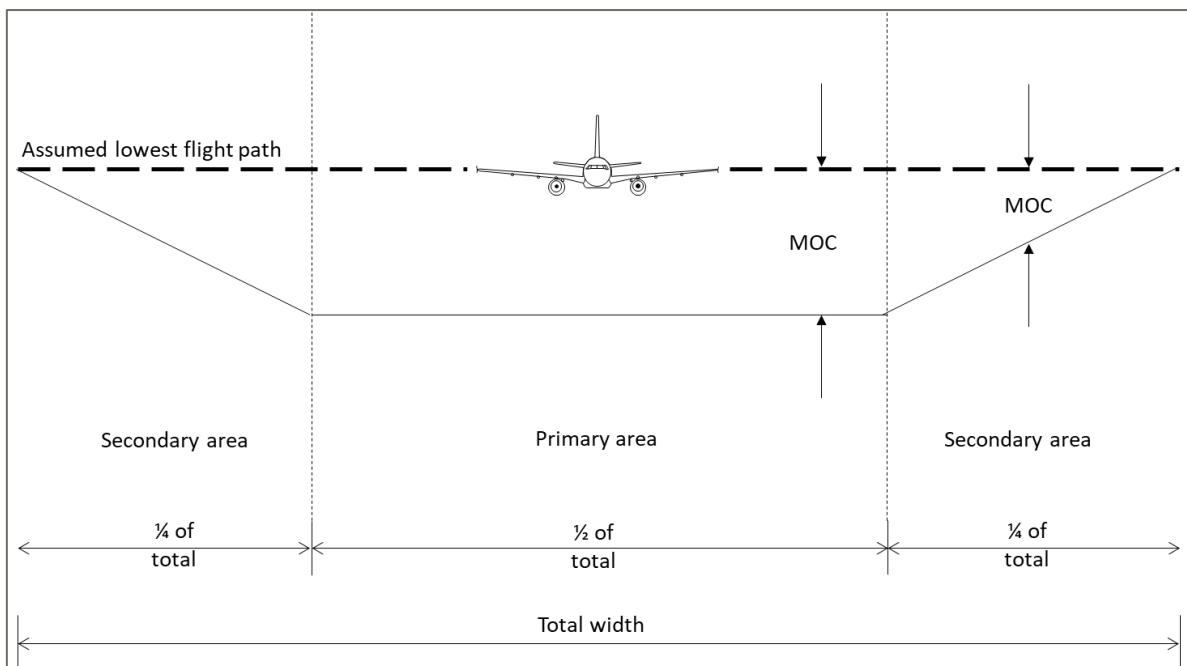


Figure 10 *Instrument Flight Procedure Minimum Obstacle Clearances*

As a general rule IFPs are designed so that there are vertical and horizontal safety margins between the specified trajectory and surrounding terrain and obstacles. These margins vary depending on the phase of flight and whether UK, European or International rules are being considered. Nevertheless, the vertical margins are typically 300m (984 feet) except in particularly mountainous regions, which London is not.

The maximum altitude⁷ of the proposed development is 281 feet. This means that aircraft subject to any IFP route or limit of more than 1,265 feet will not be affected.

⁷ The highest elevated section of the Proposed Development (85.475m), is approximately 280.430 feet, and has been rounded up to the nearest whole foot to be conservative.

The assessment has been undertaken based on Pager Power's understanding of IFPs to give an indication of whether any of the published IFPs will be impacted by the proposed development. This analysis should not replace an official IFP assessment undertaken by an Approved Procedure Design Organisation⁸ (APDO).

6.2 Maximum Elevation Figure (MEF)

The MEF shows the maximum altitude of the highest terrain or structure in a particular quadrangle of a standard aeronautical chart. The Proposed Development is located within the quadrangle where the MEF is 1,300 feet. The Proposed Development is 1,019 feet below the MEF; therefore, the MEF will not be affected by the Proposed Development.

6.3 Area Minimum Altitude (AMA)

The AMA provides minimum obstacle clearance above all obstacles (terrain and structures) in a particular quadrangle of an aeronautical chart, normally this requirement is 2,000ft in mountainous areas and 1,000ft otherwise.

The AMA shown for the quadrangle in which the Proposed Development is located is 2,200 feet. The Proposed Development is 1,919 feet below the AMA, which is 919 feet greater than the specified clearance of 1,000 feet. The Proposed Development will therefore not affect the current AMA.

6.4 High-Level IFPs Assessment

Where the OLS of an aerodrome are not infringed by a development, no impact is typically predicted upon the IFPs. The Proposed Development is laterally clear of the OLS at London City Airport; no further assessment of IFPs associated with London City Airport has thus been carried out.

Considering the distance between the Proposed Development and London City Airport, and its height relative to existing obstructions such as One Canada Square and The Shard, existing procedures are designed not to be impacted by these obstructions. Therefore, if IFPs are not impacted by obstructions of larger heights at closer distances, then the Proposed Development of a smaller height at a further distance is not predicted to impact IFPs associated with London City Airport.

6.5 Conclusions

The Proposed Development is vertically clear of the MEF by 1,019 feet and vertically clear of the AMA by 1,919 feet. Considering the Proposed Development is laterally clear of the OLS for London City Airport, the Proposed Development is not predicted to impact IFPs associated with London City Airport.

A detailed IFP assessment undertaken by an APDO may be requested by London City Airport. Consultation with the safeguarding teams at London City Airport is recommended to confirm their position.

⁸ <https://www.caa.co.uk/commercial-industry/airspace/instrument-flight-procedures/approved-procedure-design-organisations/>

7 LIGHTING REQUIREMENTS AND CRANE USAGE

7.1 Overview

Aviation lighting is required where an object becomes a collision risk. This is most likely where there is an infringement of the OLS. It also becomes mandatory to have lighting where an object extends to 150m above ground level or more. The following section outlines the requirements for aviation lighting for the Proposed Development and cranes.

7.2 Aviation Lighting

The Proposed Development measures a maximum of 77.46m above ground level and does not infringe the OLS of the nearest certificated/licensed aerodrome (London City Airport).

CAP168 published by the CAA defines an obstacle as:

'All fixed (whether temporary or permanent) and mobile objects, or parts thereof, that are located on an area intended for the surface movement of aircraft, or that extends above a defined surface intended to protect aircraft in flight, or that stand outside those defined surfaces and that have been assessed as being a hazard to air navigation.'

A legal requirement for aviation lighting has not been identified for the Proposed Development.

The Proposed Development is located within the London City Control Zone (CTR) and therefore may require lighting if deemed necessary by London City Airport, although the Proposed Development is not considered to be in a sensitive area for operations associated with London City Airport. Lighting of the Proposed Development is not predicted to be required.

7.3 Crane Usage

During the construction phase, cranes will be present at the site that will reach elevations greater than the final building height. In principle, safeguarding concerns for cranes are the same as for building developments. A crane design is not understood to be finalised for the Proposed Development at this stage in the Planning process.

The Proposed Development is laterally clear of the OLS for the nearest certificated/licensed aerodrome; therefore, cranes will also be laterally clear of the OLS. Due to cranes posing a temporary obstacle likely and likely to exceed the height of the Proposed Development, it is considered likely that proposed cranes will require steady red medium-intensity aviation lighting for the crane tower and jib. The proposed heights and positions of the cranes should be identified as soon as possible so that a detailed IFP assessment can be completed, if requested.

The Civil Aviation Authority (CAA) should also be notified of the proposed development and any proposed cranes using the Airspace Coordination and Obstacle Management Service⁹ (ACOMS). The registration process is via the CAA customer portal to access the ACOMS service to submit a notification.

⁹ <https://www.caa.co.uk/commercial-industry/airspace/event-and-obstacle-notification/crane-notification/>

APPENDIX A – COORDINATE DATA

Block	Longitude (°)	Latitude (°)	Assessed Elevation (m amsl)	Coordinate
Affordable Living Block	-0.06294	51.59022	32.205	1
	-0.06303	51.59002		2
	-0.06275	51.58997		3
	-0.06274	51.58998		4
	-0.06192	51.58984		5
	-0.06193	51.58983		6
	-0.06164	51.58978		7
	-0.06155	51.59000		8
	-0.06183	51.59004		9
	-0.06186	51.58999		10
	-0.06268	51.59013		11
	-0.06266	51.59017		12
Shared Living Tower	-0.06305	51.58987	85.475	13
	-0.06312	51.58970		14
	-0.06312	51.58970		15
	-0.06314	51.58964		16
	-0.06278	51.58955		17
	-0.06273	51.58962		18
	-0.06266	51.58979		19
	-0.06265	51.58980		20

Block	Longitude (°)	Latitude (°)	Assessed Elevation (m amsl)	Coordinate
Shared Living Block	-0.06273	51.58962	35.750	21
	-0.06200	51.58950		22
	-0.06201	51.58947		23
	-0.06178	51.58944		24
	-0.06170	51.58961		25
	-0.06173	51.58964		26
	-0.06201	51.58969		27
	-0.06202	51.58968		28
	-0.06266	51.58979		29

Coordinate data



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