

From: <redacted>

Sent: 10 May 2023 11:05

To: <redacted>

Cc: <redacted>

Subject: RE: Civil Aviation Authority : Draft Airspace Change Masterplan <redacted>

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Thank-you for the opportunity to review the consultation documents. Please see our comments below:

- The EA doesn't directly consider air space in our air quality work, however we note the SEA and HRA baseline considers impacts/cumulative impacts to ambient air quality at the local level. The EA may regulate industry at or close to airports.
- On a technical note there appears to be no table of 'Relevant AQ local and national legislation' in the SEA.
- Population and Health (and wellbeing) is considered, however there is little consideration of environmental or social equity and the levelling agenda. There are many national and international policies, and obligations that require equitable approaches and equitable outcomes. Equity is referenced in Table 9: National Policy Relevant to Population and Health in the PHW Public Health England (2019) strategy and inequalities in the PHE Strategy 2020-25 of the SEA (page 22/23 of SEA) but it is not referred further in the SEA or HRA. Equity should be a key consideration and this should be demonstrated in the SEA and HRA.
- Consultation and engagement should include those most impacted by any changes. This should specifically include the most vulnerable, those underserved and those living with existing inequalities. There should be continuous engagement with these communities - this will benefit the SEA and HRA, and the whole process. It will help in the development, co-design and implementation of the airspace changes and will optimise the CAA approach and outcomes.
- Cumulative impacts of the system as a whole will be considered. However, significant effects should take account of existing inequalities. Where the baseline indicates existing inequalities, particularly existing poor environment and/or existing higher environmental risk, the approach should consider significance in relation to these and not add to them. Where the baseline is low we should aim to enhance and not compound or maintain status quo. The matrix should allow for "significant impact" in areas of existing poor environmental quality or existing inequalities that might not be identified through the traditional significance change scale.
- It is noted that the nature of the atmosphere, climate change and the contribution of Greenhouse Gases (GHG) are of global concern and not spatially dependent, and therefore the global climate had been identified as a 'sensitive receptor'. Due to this global scope, consideration should be given to the impacts as a whole, and should include assessment of the unintended effects/consequences of the move to a low carbon.

I hope that makes sense and helps in the development of the plan to manage the impact of the project.

Please don't hesitate to contact me if you would like to discuss.

Many thanks,

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Public Health and Air Quality

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