



Reference ANON-YN5Q-NB3J-T

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17 May 2023

Dear Sir or Madam

Consultation on the scope of the environmental assessments for the airspace change masterplan

Manchester Airports Group (MAG) owns and operates Manchester, London Stansted and East Midlands airports. Therefore, its airports and the airspace that serves them are at the core of the Airspace Modernisation Strategy (AMS). MAG welcomes the opportunity to contribute to the consultation on the scope of the environmental assessments for the airspace change masterplan.

However, it is not possible to provide a full response to the consultation questions until the interaction between the airspace change masterplan environmental assessments and the process under CAP1616 for individual airspace change proposals has been considered and described.

We are concerned to ensure that the requirements set out in CAP2156a and CAP2156b, including the requirements for environmental assessment, apply to the appropriate iteration of the masterplan and, as a result, are addressed at the most appropriate stage in the CAP1616 process. In particular:

1. The interrelationship between the environmental assessments for the airspace change masterplan, the CAP2156a/b process and the CAP1616 process is not adequately considered in the consultation materials. Paragraph 1.26 of the 'SEA Scoping Report' misconstrues the timing of Iteration 3 as provided for by CAP2156a, while the interaction with the CAP1616 process is notably omitted from Figure 1 in the 'Approach' document. We are concerned that, unless the timing and content of the iterations of the masterplan and the associated environmental assessments take account of the CAP2156a/b and CAP1616 processes, the airspace change masterplan process will prevent change sponsors from progressing to Stage 4 of CAP1616 in accordance with the current programme. This has to be addressed, otherwise there is a risk that the SEA and HRA would be scoped on a basis that frustrates the AMS. We believe this must be made clear to stakeholders before the scoping process can be completed.

2. Since the environmental assessments for the airspace change masterplan would be based upon proposals derived from individual airspace change proposals, as defined at Stage 3 of the CAP1616 process, there is a risk that those assessments pre-empt and potentially pre-judge the CAP1616 consultation process if carried out prematurely. Unless the airspace change masterplan is non-spatial in nature, it is hard to see how it can progress without the airspace change proposals being further advanced. Again, we feel that this must be clarified to stakeholders before scoping can be completed.

3. It is not clear how the proposed consultation in respect of SEA and HRA would interact with the consultation in respect of the airspace change masterplan. It is very important that stakeholders

are not confused as to the consultations to which they are responding and the risk of consultation fatigue is managed. This is typically managed in other sectors by close coordination between higher and lower plan-makers, which we consider would be important here. MAG would wish to understand fully the nature and content of masterplan consultation proposals well before they took place – it would wish to ensure that its own proposals were properly represented.

Notwithstanding our concerns regarding the interaction of the airspace change masterplan process with the CAP1616 process, we have sought to provide provisional comments on the consultation questions. For completeness, copies of our submitted responses are appended to this letter.

Whilst we have briefly summarised our concerns regarding the interaction between CAP1616 and CAP2156 to provide context to the current consultation, we will write separately to the CAA to articulate our view in full regarding the interaction between CAP1616 and CAP2156, including in respect of environmental assessments.

In the meantime, should you have any questions in response to our submission or require further clarification of any of the issues raised, please do not hesitate to contact us.

Yours sincerely

A handwritten signature in black ink, appearing to read 'N.A. Robinson' with a stylized flourish at the end.

Neil Robinson

CSR & Future Airspace Director

