

## Response ID ANON-YN5Q-NB3F-P

Submitted to Airspace change masterplan: scoping the environmental assessments  
Submitted on 2023-05-03 12:14:29

### About you

A Are you responding in an official capacity on behalf of an organisation?

Yes

Organisation:  
Stansted Airport Watch (SAW)

B What is your name?

Name:  
Sarah Cousins

C What is your email address?

Email:  
info@stanstedairportwatch.com

D Are you answering as:

Local organisation e.g. community action group, airport consultative committee or forum

other category:

E Where do you live or where is your organisation based?

East of England

F Is there anything else that you would like us to know about you in connection with your response?

any other information about you:

Stansted Airport Watch was established in 2002 in response to Government proposals for major expansion at Stansted Airport. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable and, in this way, to protect the quality of life of residents over wide areas of Cambridgeshire, Essex, Hertfordshire and Suffolk, to preserve our heritage and to protect the natural environment.

G Do you consent to us contacting you by email about the outcome of this consultation?

Yes

H Do you consent to your response being published?

yes, with personal identifying information (we will publish your organisation, name, respondent category, location, and any additional information – please note your email address will NOT be published if you choose this option)

### What this consultation is about

#### SEA Scoping Report

1 Are you satisfied with the environmental aspects we have scoped out and in of the SEA, and the objectives, targets and indicators?

Yes

Reasons:

2 Are you satisfied with how any significant effects will be identified?

Yes

Reasons:

3 Are you satisfied with the definition of the future baseline, assessment case and alternatives?

Not Answered

Reasons:

Yes but with the qualification that the interdependencies of aircraft flights operating from neighbouring airports where they use common airspace must be stated with the associated environmental impacts in order to ensure the cumulative impacts of ACPs are clearly identified.

4 Are you satisfied with the proposed Zones of Influence for each environmental aspect?

No

Reasons:

We challenge the statement in para 4.12 of the Scoping Report that "it is only the altitude between 500 and 1,000ft which is considered in scope for effects on local air quality. This equates to a distance of approximately 6km from an airport". It is not clear what evidence the Scoping Report relies upon in deciding that only emissions between 500 and 1,000ft should be considered.

The United Nations agency ICAO sets international Standards and Recommended Practices for aviation and Annex 16 recommends that emissions up to 3,000ft should be taken into account when assessing the impact of aircraft emissions on local air quality near airports. See ICAO Annex 16 <https://www.icao.int/Meetings/ENVSymposium/Presentations/Neil%20Dickson%20Session%205v2.pdf>

The Zone of Interest for the effects of local air quality should extend up to 3,000ft, but also see our answer to Question 8. Furthermore, it is well documented that ultrafine particles (UFPs) travel much further from airports than particulate matter such as PM10 and PM2.5 particles. For instance, they are detected in Central London emanating from Heathrow – see Air Quality News report [https://airqualitynews.com/uncategorised/heathrow-airport-pollution-detected-in-central-london/#:~:text=Two%20monitors%20at%20North%20Kensington,from%](https://airqualitynews.com/uncategorised/heathrow-airport-pollution-detected-in-central-london/#:~:text=Two%20monitors%20at%20North%20Kensington,from%20)

We believe this distance from an airport must be increased to take account of UFPs.

Additionally, it needs to be recognised that the take-off and landing cycle at airports is a major source of local noise and emissions with consequent adverse health impacts.

5 Do you have any comments about the type and use of available regional data for each geographical 'cluster'?

Comments about type and use of available regional data for each geographical 'cluster':

Don't know. Since it is not clear from the HRA draft Screening Report what is meant by "type and use of available regional data".

6 Do you have any other points you would like to raise in relation to the SEA Scoping Report?

Do you have any other points you would like to raise in relation to the SEA Scoping Report?:

Yes.

Firstly, the publication of an Airspace Master Plan is very much welcomed. For far too long airspace changes have been undertaken piecemeal without knowledge of likely future changes and without taking account of interdependencies for people living under airspace served by more than one airport. The fundamental environmental and planning principles for airspace changes must be:

- "To avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise" as set out in the Environmental Noise Directive 2002/49/EC and transposed into English law by statutory instrument.
- To avoid introducing noise where it did not previously exist since many people make important decisions on where to live based upon likely noise disturbance.
- To provide long-term stability of routes to inform land use planning by local government authorities for housing, schooling, medical facilities, commercial and similar developments.

## HRA Screening Report

7 Are you satisfied that the HRA Screening Report correctly identifies all potential significant effects on European Sites?

Not Answered

if no, what other effects could result from the masterplan?:

Yes and Master Plan iterations should inform decisions on whether any further potential effects emerge which need consideration.

8 Are the precautionary Zones of Influence applied to each potential effect to determine which European sites may be affected by the implementation of the masterplan appropriate for the purposes of screening?

No

Reasons:

The Zone of Influence "18km from airfield boundary" given in Table 1 is totally unacceptable. This fails to protect the health and wellbeing of the population from the harms of aircraft noise living close to airfields and under flightpaths. At 18km aircraft will only just be at a height of 3,000ft. The DfT Guidance to the Civil Aviation Authority on Environmental Objectives (Guidance) January 2014 makes clear in para 4.1a that "in the airspace from the ground to 4,000 feet (amsl) the Government's environmental priority is to minimise the noise impact of aircraft and the number of people on the ground significantly affected by it". Furthermore, para 4.1c of the Guidance states "in the airspace from 4,000 feet (amsl) to 7,000 feet (amsl), the focus should continue to be minimising the impact of aviation noise on densely populated areas".

The Zone of Influence must be increased to a distance equivalent to a height of 7,000ft (amsl). In addition, local situations must also be taken into account whereby in rural locations, low background noise levels have a larger effect on noise impacts and sleep disturbance.

9 Do you consider that the CAA's proposed approach to applying the scientific evidence referenced in appendices B, C and D of the HRA Screening Report to stage 2 of the assessment is appropriate?

Requires major modification

If modifications are required, please give more information:

The Zone of Influence boundaries are totally unacceptable. They do not enclose sufficiently large enough areas. See answer to Question 8 above.

10 Do you consider that the CAA's proposed approach to subsequent stages (2, 3 and 4) of the Habitats Regulations assessment:

Is about right

If modifications are required, please give more information:

11 Which plans and projects do you think might act in combination with the masterplan?

Which plans and projects do you think might act in combination with the masterplan?:

Land use planning for airport expansion must be considered in combination with airspace planning. The lack of this combination has long been a failure of coherent planning. Long term stability of routes is essential to inform land use planning by local government authorities for housing, schooling, medical facilities, commercial and similar developments.

12 Do you have any other points you would like to raise in relation to the HRA Scoping Report?

Do you have any other points you would like to raise in relation to the HRA Scoping Report?:

No.

## Approach to SEA and HRA

13 Are you satisfied that the overall approach to SEA (set out in paragraph 1 of the 'Approach' document) will ensure that the environmental effects of the masterplan are fully assessed?

No

If no, in what ways could the approach be improved?:

See the added requirements for environmental effects given in our answer to Question 15.

14 Do you have any comments on the timing of the SEA (stages 1.B – 1.F and Figure 1 in the 'Approach' document) during the development of each masterplan iteration?

Do you have any comments on the timing of the SEA (stages 1.B – 1.F and Figure 1 in the 'Approach' document) during the development of each masterplan iteration?:

No.

15 Do you have any other comments you would like to make on the approach to SEA of the masterplan (set out in paragraph 1 and Figure 1 of the 'Approach' document)?

Do you have any other comments you would like to make on the approach to SEA of the masterplan (set out in paragraph 1 and Figure 1 of the 'Approach' document)? :

Yes.

The approach must ensure an equitable balance is achieved between improvements in efficient use of airspace for the airlines on the one hand and the reduction of environmental harms, particularly noise, for local residents living around airports on the other hand. The Aviation Policy Framework March 2013 states in para 3.3 "This means that the industry must continue to reduce and mitigate noise as airport capacity grows".

Furthermore, technology advances with the introduction of Performance Based Navigation (PBN) must be exploited to enable flight paths to be tailored to suit each airport to reduce the numbers of local people affected by noise together with alternative routings to provide respite.

16 Do you agree that it is not possible to rule out significant effects on European sites (or offshore marine sites) as a result of the masterplan? (paragraph 2.A of the 'Approach' document)

Yes

If no, in what ways could the approach be improved?:

17 Do you have any comments on the intention to deliver any required mitigation for adverse effects on the integrity of European sites (or offshore marine sites) at the project level, through the approval process for individual airspace change proposals - rather than at the strategic level through the masterplan? (paragraph 2.C of the 'Approach' document)

Do you have any comments on the intention to deliver any required mitigation for adverse effects on the integrity of European sites (or offshore marine sites) at the project level, through the approval process for individual ACPs - rather than at the strategic level through the masterplan? (paragraph 2.C of the 'Approach' document) :

No.

18 Do you have any other comments you would like to make on the approach to HRA of the masterplan (set out in paragraph 2 and Figure 1 of the 'Approach' document)?

Do you have any other comments you would like to make on the approach to HRA of the masterplan (set out in paragraph 2 and Figure 1 of the 'Approach' document)?:

No.

#### Submitting additional supporting material

19 Are you submitting additional material via email?

No