

CAA Environmental Assessment

Title of airspace change proposal	Enabling BVLOS UAS Operations from Keevil Airfield
Change Sponsor	MOD
Project reference	ACP-2021-006
Account Manager	[REDACTED]
Case study commencement date	7 Dec 22 (Formal Submission V1.1)
Case study report as at	1 Feb 23
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the 'status' column is completed using the following options:</p> <ul style="list-style-type: none"> • YES • NO • PARTIALLY • N/A <p>To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved YES not resolved PARTIALLY not compliant NO</p>	

1. Introduction

This Airspace Change Proposal (ACP) addresses the need to create segregated airspace to facilitate the operation of military Remotely Piloted Air Systems (RPAS) beyond visual line of sight (BVLOS) from Keevil Airfield, Wiltshire. The proposal is to create a Danger Area to allow RPAS to operate from Keevil Airfield and facilitate access to the Salisbury Plain Danger Area complex. Following the three phases of Options Appraisal, Option 2 Design 1 was determined to be the best design option and therefore the proposed solution.

The proposed option (Option 2 Design 1) is shown in figure 1. This option is for multi-point Danger Area, designed to reduce the amount of airspace to the minimum required for The Change Sponsor's RPAS Operations. The Danger Area is 4.9 Nautical Mile (9.1km) wide, orientated in line with Keevil Airfield's runway 06/24, extending from surface to 3,200ft above mean sea level (AMSL).

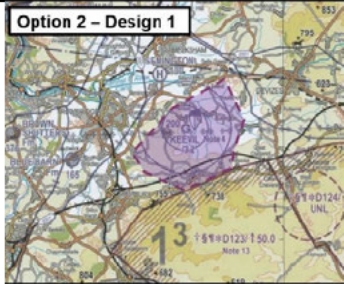


Figure 1 Option 2 Design 1

The danger Areas will be activated by NOTAM; however, it is not stated how often the Danger Area will be activated. Activation will be by NOTAM and only when required, which is nominally likely to be Mon-Fri in daylight hours for periods of 3-6 weeks at a time. There are expected to be one or two BVLOS aircraft sorties a day. This is anticipated to leave a period of time for other airspace users to cross the Danger Area via a Danger Area Crossing Service (DACS). The Danger Area is required to remain active whilst BVLOS aircraft are airborne due to the potential need to recover the aircraft to Keevil Airfield in the event of an emergency.

The ACP is scaled as a Level M1 as it has potential to alter civil aviation traffic patterns below 7,000 feet over an inhabited area and is being sponsored by MOD. For Level M1 ACPs, the CAA is directed to disregard the impact on military traffic and only consider the anticipated environmental impacts of the consequential changes on civil aviation patterns.

2. Nature of the Proposed Change		Status
2.1	Is it clear how the proposed change will operate, and therefore what the likely environmental impacts will be?	Yes
	<p>The airspace around Keevil Airfield and therefore within the area of the proposed Danger Areas is classified as Category G and is therefore uncontrolled and hence there are no restrictions on which aircraft can enter it, what equipment the aircraft must carry and the routes taken by the aircraft. This therefore means that the activity of other airspace users, and hence those airspace users consequentially affected by the change, are not possible to predict with any certainty.</p> <p>To help understand current aircraft activity (i.e. the baseline situation) The Change Sponsor conducted observations over a two week period and identified (weekdays only):</p>	

	<ul style="list-style-type: none"> • 164 aircraft operated in the vicinity of Keevil Airfield, 88 were civilian and 76 were military. It should be noted that the consequential impact on the 76 military aircraft is outside of the scope of this assessment; • 76% of airspace users currently elect to route around Keevil Airfield to the north; • The majority of users that routinely operate below 3,000ft and within 2NM of the airfield are military helicopters and local gliders (gliders launched from Keevil itself); • Some air users (around 1 in 12) elect to use the railway line for VFR navigation; and • Very few (17) air users elect to transit overhead below 3,000 ft AMSL during the 2 week period. The average operating altitude for those 17 aircraft were between 1000 - 2000 ft AMSL. <p>Therefore based on these observations, it is likely only 24% of the 88 civilian aircraft observed over a two-week period will be affected by the change (equivalent to an average of 2 aircraft per day). The Change Sponsor has therefore concluded that the proposed Danger Area “will have a limited impact on air users when compared with the current situation” and as a result of the stated ‘limited impact’ “there is a negligible impact on local air quality, noise and biodiversity as a result of aviation activities currently undertaken in and around Keevil.” However, The Change Sponsor also states that it is ‘impossible to accurately determine’ aircraft behaviour.</p> <p>The CAA agrees that the Proposed Danger Area will have a negligible environmental impact as result of the consequential impacts on other airspace users. This conclusion is formed due to the minimal number of in-scope aircraft identified to be affected, which will be further mitigated through the introduction of a DACS.</p>
--	--

3. Secretary of State Call-in Noise Criterion		Status
3.1	<p>Is the proposal likely to meet the Secretary of State’s criterion for call-in on noise impacts? If yes, has the additional assessment on that criterion been undertaken and what are the results? If no, what is the rationale for that conclusion?</p> <p><i>The criterion, as set out in the DfT’s Air Navigation Guidance (2017)¹ is that the proposed airspace change could lead to a change in noise distribution resulting in a 10,000 net increase in the number of people subjected to a noise level of at least 54 dB² as well as having an identified adverse impact on health and quality of life.³</i></p>	No

¹ The DfT’s call-in criteria are set out in The Civil Aviation Authority (Air Navigation) Directions 2017, Section 6, paragraph (5). These Directions are replicated in Annex D of the DfT’s Air Navigation Guidance 2017,

² LAeq 16h noise exposure.

³ The assessment of the numbers of people affected and the associated adverse impacts on health and quality of life of the airspace change proposal should be carried out by The Change Sponsor in accordance with the requirements set out in the DfT’s Guidance.

	<p>CAP1616 para B54 identifies that an assessment of health and quality life impacts using DfT's WebTAG will not be required for any airfield or aerodrome with fewer than an average of 30 movements per day. This screening criteria assumes that 30 aircraft movements per day will be required to trigger noise levels in 51 dB LAeq,16h which is the point at adverse effects begin to be seen on a community basis and therefore the lowest input value for the purposes of WebTAG. A 3dB increase in noise is equivalent to a doubling of noise energy and therefore approximately 60 aircraft movement per day will be required to result in noise levels above 54 dB LAeq,16.</p> <p>The CAA therefore concludes that the airspace change is unlikely to lead to a change in noise distribution resulting in a 10,000 net increase in the number of people subjected to a noise level of at least 54 dB LAeq 16hr or have an identified adverse impact on health and quality of life.</p>
--	--

4. Statement of Need		Status
4.1	Does the Statement of Need include any environmental factors?	No
	<p>The statement of need does not include any environmental factors. The Statement of Need says:</p> <p><i>"Approval is sought for a Permanent Airspace Change surrounding Keevil Airfield, a satellite aerodrome of RAF Brize Norton located North West of the Salisbury Plain Danger Areas.</i></p> <p><i>In order to comply with current MAA regulation, segregated airspace is required to facilitate Beyond Visual Line of Sight (BVLOS) operation of military Remotely Piloted Air Systems (RPAS) between Keevil and EG D123; the principal operating airspace already utilised for military BVLOS activity. The airspace design must enable military RPAS to remain within segregated airspace at all times.</i></p> <p><i>Operating from Keevil allows for essential aircrew and groundcrew training in an environment that is not practicable from other UK locations."</i></p>	

5. Design Principles		Status
5.1	Does the final set of Design Principles include any environmental objectives?	Yes
	<p>The Change Sponsor developed a set of six Design Principles as shown in figure 2. <i>Design Principle F 'Minimise the impact of operating noise to local residents'</i> includes an environmental objective. However, this Design Principle refers to operating noise (i.e. noise from the RPAS) and hence is out of scope of this Environmental Assessment and Statement and therefore this Design Principle is not considered to include an environmental objective.</p>	

The Change Sponsor also developed **Design Principle C** *'Minimise the impact to other airspace users, both in terms of activation and volume of airspace required.'* This Design Principle includes an objective to minimise the impact on other airspace users, which, if achieved would also influence the environmental impacts as result of consequential impacts on other airspace users. Design Principle C is therefore considered to include an environmental objective.

DP	Design Principle	Priority
A	Provide a safe environment for all airspace users	1
B	Provide sufficient airspace to meet all reasonable technical requirements for the Watchkeeper RPAS platform that are required to facilitate safe access to and from SPTA and usage of Keevil Airfield.	2
C	Minimise the impact to other airspace users, both in terms of activation and volume of airspace required.	3
D	Make the airspace as accessible as possible to all types of air user.	4
E	Use standard airspace structure where possible (conformity, simplicity and safety).	5
F	Minimise the impact of operating noise to local residents	6

Figure 2 Final set of Design Principles

5.2	Does the proposal explain how and to what extent the final airspace design achieves any environmental Design Principles?	Yes
	With regards Design Principle C, The Change Sponsor explains that the proposed Danger Area minimises impact on other airspace users.	
5.3	Were there any proposed environmental Design Principles that were rejected from the final set? If so, is the rationale for rejecting those Principles reasonable?	No
	The initial draft list of Design Principles did not include any Design Principles with environmental objectives. However, based on engagement feedback a Design Principle focused on operating noise was added to the final set. However, as stated in Question 5.1 the impact referred to within this Design Principle is outside of the scope of this Environmental Assessment and Statement.	
5.4	Were there any design options during the airspace change process that might have better met the environmental Design Principles than the final proposal as submitted to the CAA? If so, is the rationale for rejecting those options set out?	No

	The Change Sponsor states that the proposed design option has the minimal dimensions required. It is therefore considered to be this design option that best meets Design Principle C and the objective to minimise the impact on other airspace users. Additionally, impacts will be further mitigated through the implementation of a DACS.
--	---

6. Options Appraisal		Status
6.1	Have environmental impacts been adequately reflected and assessed in the Options Appraisal?	Partial
	<p>The Change Sponsor has asserted that it is difficult to <i>"meaningfully quantify any environment issues"</i> as the local airspace <i>"is entirely within Class G airspace the operation of aircraft cannot be accurately predicted"</i> and therefore <i>"the number and type of aircraft movements in the area cannot be accurately quantified."</i> The Change Sponsor has therefore qualitatively assessed all environmental impacts within its Options Appraisal.</p> <p>The CAA agrees that as the airspace is uncontrolled it is not possible to estimate how airspace users will fly, including the frequency, height, and ground track. Therefore the CAA agrees with the Change Sponsor's approach of only undertaking qualitative assessments.</p> <p>Noise The Change Sponsor qualitatively has assessed noise in general terms and therefore did not explicitly make a qualitative assessment against the individual noise factors of LAeq, N-above, overflight and operational diagrams. Although The Change Sponsor has provided a rationale to undertake a qualitative assessment, each of these noise metrics should still be considered and described individually.</p> <p>CO2 Emissions With regards CO2, The Change Sponsor has assessed the impacts will be 'net-zero' however, The Change Sponsor has not provided evidence to justify this conclusion or assessed consequential changes to CO2 as a result of a claimed decrease in noise due to fewer aircraft anticipated to be routing via the railway line. Net Zero is regarded and is generally defined as a balance between the amount of greenhouse gases (GHG) produced and the amount removed from the atmosphere making the balance zero. It is therefore the CAA's view the ACP will not result in net-zero GHG/CO2 impacts as the impacts from the consequentially affected aircraft will not be offset or removed from the atmosphere and will still occur.</p> <p>Local Air Quality The Change Sponsor has also incorrectly assessed local air quality as CO2 emissions. One of the government's three key environmental objectives is to minimise local air quality emissions and ensure that the UK complies with its international obligations on air quality. Oxides of nitrogen (NOx) and particulate matter are the two most important emissions. Additionally there are number of pollutants with legal obligations. Although The Change Sponsor has incorrectly assessed local air quality it is considered unlikely that the ACP would lead to a</p>	

	<p>breach of legal limits.</p> <p>The CAA deems that a breach of legal limits is only likely to become a possibility where there is likely to a change in aviation emissions (by volume or location) below 1,000 feet, and the location of the emissions is within or adjacent to an identified Air Quality Management Area (AQMA). As there are no AQMAs in the vicinity of the proposed Danger Area it considered unlikely that the change would lead to a breach of legal limits and therefore there is no requirement for The Change Sponsor to assess air quality.</p> <p>Biodiversity The Change Sponsor has not considered impacts of biodiversity within its options appraisal.</p> <p>Tranquillity The Change Sponsor has not considered impacts of tranquillity within its options appraisal.</p>	
6.2	Is the final proposal as submitted to the CAA the airspace design option that also produced the best environmental impacts as assessed by the Options Appraisal? If not, does the rationale for selecting the preferred option adequately explain this choice?	Yes
	The Change Sponsor assessed that all options result in negligible environmental impacts and therefore there is no material difference between impacts of each option.	

7. Noise [for Level 1 and Level M1 airspace change proposals]		Status
7.1	Has the noise impact been adequately assessed and presented in both the consultation material and the final submission to the CAA, taking account of scalability and proportionality?	Partial
	The Change Sponsor undertaken a high level qualitative assessment of noise due to the Class G airspace making it difficult to predict how aircraft will operate (see Question 6.1). However, as described in Question 6.1 The Change Sponsor qualitatively assessed noise in general terms and therefore did not explicitly make a qualitative assessment against the individual noise factors of LAeq, N-above, overflight and operational diagrams. However, it is the CAA's view that based on the low volumes of in-scope aircraft likely to impacted there is unlikely to be any material change in these noise metrics.	
7.2	If a noise assessment has not been undertaken by The Change Sponsor, has this decision been adequately explained and evidenced in both the consultation material and the final submission to the CAA, and is the rationale reasonable?	Partial

	The Change Sponsor has undertaken a high-level qualitative assessment of noise, however, as presented in Question 7.1 The Change Sponsor has not explicitly considered the individual metrics LAeq, Lmax (N-above), overflight or provided operational diagram. However, it is the CAA's view that based on the low volumes of in-scope aircraft likely to be impacted there is unlikely to be any material change in these noise metrics.
7.3	Summary of anticipated noise impacts from the final proposed airspace change.
	<p>The Change Sponsor has assessed that there will be <i>“no change in the level of noise compared with the ‘do nothing’ option [i.e. the baseline situation].”</i> However, the Change Sponsor goes on to contradict this conclusion and assesses that the design will lead to <i>“a decrease in noise in some areas with fewer aircraft routing via the railway line between the DZ and D123 (or routing higher if they still elect that track)”</i> and <i>“a decrease in noise for aircraft climbing over the activated airspace higher than they currently may choose to”</i>.</p> <p>Although The Change Sponsor has assessed there could be a noise benefit, it is the CAA's view that there will be no material change in noise. This conclusion is based on the low volumes of in-scope traffic that are likely to be consequentially impacted by the change and that any impacts have potential to be further mitigated through the introduction of a DACS.</p> <p>The CAA therefore concludes that:</p> <ul style="list-style-type: none"> • Noise impacts will be negligible due to the number in-scope traffic that are likely to be consequentially impacted by the change and that any impacts have potential to be further mitigated through the introduction of a DACS; • The low volume of in-scope aircraft and the frequency of activation means that noise levels in excess of the 51 dB LAeq,16h daytime LOAEL are unlikely to occur and therefore the change is unlikely to lead to an adverse impact on health and quality of life; • There is unlikely to be any night-time impact as the change Danger Area is only expected to be activated during daytime hours; • There will be a change in overflight for any aircraft required to reroute around the Danger Area, however due to the number of affected in-scope aircraft, changes in overflight will be negligible; and • Any changes in overflight will change the location of where maximum noise levels (Lmax / N-Above) occur, however, the Class G airspace means it is not possible to predict how the aircraft behaviour will change and therefore how the maximum noise level might change.

8. CO2 Emissions		Status
8.1	Has the impact on CO ₂ emissions been adequately assessed and presented in both the consultation material and the final submission to the CAA, taking account of scalability and proportionality?	Yes
	The Change Sponsor undertaken a high-level qualitative assessment of CO2 emissions due to the Class G airspace making it difficult to	

	predict how aircraft will operate (see Question 6.1).	
8.2	If an assessment of the impact on CO ₂ emissions has not been undertaken by The Change Sponsor, has this decision been adequately explained and evidenced in both the consultation material and the final submission to the CAA, and is the rationale reasonable?	N/A
	The Change Sponsor undertaken a high level qualitative assessment of CO ₂ emissions.	
8.3	Summary of anticipated impact on CO ₂ emissions from the final proposed airspace change.	
	<p>The Change Sponsor has concluded that <i>“no additional greenhouse gas emissions would arise compared to when the current DZ is activated. It is expected that if more aircraft choose to route through the airspace rather than around it will result in a minor reduction in aircraft emissions.”</i></p> <p>It should be noted that The Change Sponsor has also claimed that there could be an improvement in noise due to <i>“a decrease in noise in some areas with fewer aircraft routing via the railway line between the DZ and D123 (or routing higher if they still elect that track)”</i> and <i>“a decrease in noise for aircraft climbing over the activated airspace higher than they currently may choose to”</i>. The assessed noise benefits would affect the operation of aircraft and therefore lead to consequential change in CO₂ impacts that The Change Sponsor has not considered.</p> <p>The Change Sponsor has assessed the impacts will be ‘net-zero’ however, The Change Sponsor has not provided evidence to justify this conclusion or assessed consequential changes to CO₂ because of a claimed decrease in noise due to fewer aircraft anticipated to be routing via the railway line. Net Zero is regarded is generally defined as a balance between the amount of greenhouse gases (GHG) produces and the amount removed from the atmosphere making the balance zero. It is therefore the CAA’s view the ACP will not result in net-zero GHG/CO₂ impacts as the impacts from the consequentially affected aircraft will not be offset or removed from the atmosphere and will still occur.</p> <p>It is the CAA’s view that there will be no material change in CO₂ emissions due to the number of in-scope aircraft likely to be affected and the implementation of a DACS that will further mitigate these impacts.</p>	

9. Local Air Quality [for Level 1 and Level M1 airspace change proposals]		Status
9.1	Has the impact on Local Air Quality been adequately assessed and presented in both the consultation material and the final submission to the CAA, taking account of scalability and proportionality?	N/A

	The Change Sponsor has incorrectly assessed Local Air Quality as CO2 emissions. However, the CAA considers that local air quality impacts are only required where there is the possibility of pollutants breaching legal limits following the implementation of an airspace change (or worsening an existing breach of legal limits). The CAA deems that a breach of legal limits is only likely to become a possibility where there is likely to a change in aviation emissions (by volume or location) below 1,000 feet, and the location of the emissions is within or adjacent to an identified Air Quality Management Area. As there are no AQMAs in the vicinity of the airspace change it considered unlikely that the change would lead to a breach of legal limits and therefore there is no requirement for The Change Sponsor to assess air quality.	
9.2	If an assessment of the impact on Local Air Quality has not been undertaken by The Change Sponsor, has this decision been adequately explained and evidenced in both the consultation material and the final submission to the CAA, and is the rationale reasonable?	N/A
	As there are no AQMAs in the vicinity of the airspace change it considered unlikely that the change would lead to a breach of legal limits and therefore there is no requirement for The Change Sponsor to assess air quality.	
9.3	Summary of anticipated impact on Local Air Quality from the final proposed airspace change.	
	As there are no AQMAs in the vicinity of the airspace change it considered unlikely that the change would lead to a breach of legal limits.	

10. Tranquillity [for Level 1 and Level M1 airspace change proposals]		Status
10.1	With specific reference to Areas of Outstanding Natural Beauty and National Parks - Has the impact on tranquillity been adequately considered and presented in both the consultation material and the final submission to the CAA, taking account of scalability and proportionality?	N/A
	<p>The assessment of tranquillity is within regards to the impact on Areas of Outstanding Natural Beauty and National Parks consistent with the Government's altitude priority that <i>"states where practicable, it is desirable that airspace routes below 7,000 feet should seek to avoid flying over Areas of Outstanding Natural Beauty (AONB) and National Parks."</i></p> <p>There are no Areas of Outstanding Natural Beauty or National Parks within area of the Danger Area and 'potentially affected area' as identified on the CAA portal⁴ and therefore no requirement for The Change Sponsor to assess tranquillity.</p>	
10.2	If consideration of the impact on tranquillity has not been undertaken by The Change Sponsor, has this decision been adequately explained and evidenced in both the consultation material and the final submission to the CAA, and is the rationale reasonable?	N/A

⁴ See <https://airspacechange.caa.co.uk/PublicProposalArea?pid=341>

	The assessment of tranquillity is scoped out of the assessment as there are no Areas of Outstanding Natural Beauty or National Parks within area of the Danger Area and 'potentially affected area' as identified on the CAA portal and therefore no requirement for The Change Sponsor to assess tranquillity.
10.3	Summary of anticipated impact on tranquillity from the final proposed airspace change.
	There are no Areas of Outstanding Natural Beauty or National Parks within area of the Danger Area and 'potentially affected area' as identified on the CAA portal and therefore there are unlikely to be any impacts on tranquillity.

11. Biodiversity [for Level 1 and Level M1 airspace change proposals]		Status
11.1	Has the impact on biodiversity been adequately assessed and presented in both the consultation material and the final submission to the CAA, taking account of scalability and proportionality?	No
	The Change Sponsor has not explicitly considered biodiversity within its options appraisal. However, the CAA's working assumption is that impacts on biodiversity occur because of changes to air quality and noise in the vicinity of biodiversity receptors. Therefore, as The Change Sponsor has determined a negligible impact on noise and air quality it is considered unlikely the ACP would lead to a biodiversity impact.	
11.2	If assessment of the impact on biodiversity has not been undertaken by The Change Sponsor, has this decision been adequately explained and evidenced in both the consultation material and the final submission to the CAA, and is the rationale reasonable?	No
	The Change Sponsor has not explicitly assessed biodiversity; however, The Change Sponsor has assessed a negligible impact on noise and air quality and therefore it is considered unlikely the ACP would lead to a biodiversity impact.	
11.3	Summary of anticipated impact on biodiversity from the final proposed airspace change.	
	The Change Sponsor has not explicitly assessed biodiversity; however, The Change Sponsor has assessed a negligible impact on noise and air quality and therefore it is considered unlikely the ACP would lead to a biodiversity impact.	

12. Traffic Forecasts		Status
12.1	Have traffic forecasts been provided, are they reasonable, and have these been used to reflect the anticipated environmental impacts of the proposal?	No
	The Change Sponsor has undertaken a qualitative assessment and therefore a traffic forecast was not developed. However, The Change Sponsor has stated " <i>traffic is not expected to significantly differ from that currently experienced in the area over the next 10-years.</i> " It should be noted that normally assessments should consider how the environmental impacts would change over a longer-term (i.e., the 10-year forecast period) even for situations where traffic is not expected to grow. This longer-term impact was not assessed by The Change	

	<p>Sponsor. For the purposes of this ACP, this impact should consider how the activity of other airspace users might change and therefore whether the number of aircraft consequentially affected would change and therefore the assessed impact.</p> <p>However, it is concluded by the CAA that as The Change Sponsor has assessed all impacts to be negligible, this conclusion of negligible impacts would not change over the long-term.</p>
--	---

13. Consultation		Status
13.1	Has The Change Sponsor taken account of any environmental factors (noise, CO ₂ emissions, Local Air Quality, tranquillity or biodiversity) raised by consultees or has evidence been provided to indicate why this has not been possible?	Yes
	The Change Sponsor's consultation activities are assessed in the separate CAA Consultation Assessment ⁵ . This assessment concludes that The Change Sponsor has taken account of all environmental factors raised by consultees. While most responses received from local community were either in support or neutral, there were some concerns around noise impact of the Watchkeeper aircraft. The Change Sponsor explained that all designs have been developed to facilitate multiple transit routes and hold locations to minimise overflight of the same areas. From a CAP1616 perspective, as an MOD Sponsor, the Change Sponsor is exempt from assessing the noise impact of their own operations and regulatory assessment of specific noise abatement procedures are out of scope for this ACP. One response suggested that air pollution should be taken into account as well as noise pollution. However, as identified in Question 9.1, the assessment of Air Quality has been screened out of the assessment.	

14. Public Evidence Session (if held)		Status
14.1	If a Public Evidence Session has been held, was any <u>new</u> evidence on potential environmental impacts presented?	N/A
	No Public evidence session was held.	
14.2	If so, was the new evidence relevant and material to the CAA's consideration of the environmental impacts of the submitted airspace change proposal?	N/A
	No Public evidence session was held.	

⁵ [20221107-Keevil Stage 5 Consultation Assessment](#)

15. Compliance with policy and guidance from Government, ICCAN or the CAA		Status
15.1	Has The Change Sponsor satisfied all relevant policy and/or guidance from either the Government, ICCAN or the CAA, with regards to environmental impacts of the proposed airspace change?	Yes
	The Change Sponsor has satisfied all relevant policy and/or guidance with regards to environmental impacts of the proposed airspace change.	
15.2	Has The Change Sponsor adequately considered the DfT's Altitude-Based Priorities ⁶ ?	Yes
	The Change Sponsor has adequately consider the DfT's Altitude-Based Priorities and assessed all the required impacts for a Level 1 change with noise being given priority over CO2.	

16. Other aspects		Status
16.1	Are there any other aspects of the airspace change proposal that have not already been addressed in this report but that may have a bearing on the environmental impact?	No
	There are no other aspects of the airspace change proposal that have not already been addressed that may have a bearing on the environmental impact	

17. Recommendations/Conditions/PIR Data Requirements		Status
17.1	Are there any Recommendations which the Change Sponsor should try to address either before or after implementation (if approved)? If yes, please list them below.	No
	There are no recommendations for The Change Sponsor to address.	
17.2	Are there any Condition(s) which the change Sponsor must fulfil either before or after implementation (if approved)? If yes, please list them below.	No
	There are no conditions for The Change Sponsor to fulfil.	

⁶ Paragraph 3.3, DfT's Air Navigation Guidance 2017

17.3	Are there any specific requirements in terms of the data to be collected by the Change Sponsor for the Post Implementation Review (if approved)? If yes, please list them below.	Yes
	<p>The Change Sponsor should collect the following data for the Post Implementation Review:</p> <ul style="list-style-type: none"> • Number, timings and duration of the DA activations; • Number, type, and altitude of aircraft rerouting around and overhead the DA, aircraft requesting a DACS and aircraft being refused a DACS; and • Location where rerouted aircraft operate. 	

18. Summary of Assessment of Environmental Impacts & Conclusions

The Change Sponsor has assessed that all environmental impacts will be negligible. The CAA agrees with this conclusion. This conclusion is based on the minimal number of aircraft consequentially affected by the change, the anticipated activation (i.e., not continuously activated), the Danger Area design having the minimal dimension required and that any impact will be further mitigated through the introduction of a DACS.

Level 1 ACP [please delete as applicable]

Environmental assessment sign-off	Name	Signature	Date
Environmental assessment completed by Airspace Regulator (Environment)	[REDACTED]	[REDACTED]	08/02/2023
Environmental assessment approved by Airspace Regulator (Environment)	[REDACTED]	[REDACTED]	10/02/2023
Environmental assessment conclusions approved by Manager AR	[REDACTED]	[REDACTED]	20/02/23