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*for the South East of England*

[redacted]

National Infrastructure Planning
Temple Quay House
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**Re: Written Representation in respect of the Manston Airport DCO submitted by RiverOak Strategic Partners Ltd.**

This letter constitutes my written representation in response to the Application by RiverOak Strategic Partners for an Order Granting Development Consent for the upgrade and reopening of Manston Airport. I am commenting as a Member of the European Parliament for South East England, including Kent, to object in the strongest way possible to RiverOak Strategic Partners' being granted a Development Consent Order (DCO) to reopen the Manston Airport site as a freight airport and to urge the rejection of the proposed development. My objection is based on the following primary points, outlined in detail below.

## Environmental impact

### Air pollution

I am convinced that particulate pollution from the proposed freight hub would seriously endanger the health and wellbeing of local communities in the surrounding towns and villages, including Minster, Manston, Margate and Ramsgate, and would exacerbate the UK's air pollution crisis in general.

Across Kent, we already regularly witness high levels of air pollution, which causes a range of serious health impacts and is linked to nearly 800 deaths in the county every year. The latest figures available also prove that Thanet, where the Manston Airport site is located, already has the county's largest amount of air pollution-related premature deaths, with 90 deaths linked to long-term exposure to air pollution in 2010.[1]

I take issue with the statement in RSP's Environmental Statement that concentrations of PM10 and PM2.5, the miniscule pollutants that are easily absorbed by human tissue, "are within *legal* limits across most of the country" as RSP fail to make it clear that almost 80% of towns and cities in the UK are breaching *safe* levels of dangerous particulate matter (PM) pollution, which is linked to 29,000 deaths every year in the UK and among the pollutants that cause the most harm to human health.

According to the latest available information from Thanet District Council[2], PM2.5 is not monitored in the area; consequently there are currently no measures in place to specifically address PM2.5 concentrations within the District. Therefore, any reference to it being within limits or not too severe in relation to the proposal at hand is wrong. PM10 is only being measured at two sites in Thanet, Birchington and Ramsgate, and while they are currently under annual mean limits, and despite a slight reduction in levels at both sites on 2016 levels, both sites are above 2014 levels, they are stagnant rather than actively being reduced (currently between 23 and 24ug/$m^3$). In addition, the capture rate in Birchington is only 89.9% so the level of pollution could, in fact, be higher. Given this

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[2] Thanet District Council, 2018 Air Quality Annual Status Report (ASR), September 2018, [redacted]

information, it beggars belief that RSP state "Concentrations of PM10 and PM2.5 5 around the site are low and the Proposed Development will make a small contribution to pollutant concentrations" as there is no or not enough data available to back up this claim.

Furthermore, I don't accept RiverOak's claim that there is "scientific uncertainty about the health effects of $NO_2$". Not only is the evidence for the negative health impacts of $NO_2$ well established, it is becoming stronger and stronger every day. In the UK, $NO_2$ pollution alone is linked to the premature deaths of 23,500 people every year, with 90% of Britain's urban areas experiencing illegal levels of $NO_2$ pollution since 2010. Air pollution has significant health implications; it is classified as a human carcinogen by the World Health Organisation (WHO)[3] and is linked to lung cancer, asthma, and cardiovascular illness. Shortness of breath and coughing are common respiratory symptoms of exposure to air pollution. $NO_2$ inflames the lining of the lungs and makes them more susceptible to illnesses such as bronchitis. It affects every single one of us, but the impact on people with asthma is particularly acute.[4] Children are also particularly vulnerable, and if their developing lungs are affected the damage is permanent and life-limiting.

The proposal forecasts 9,903 annual HGV movements in year 2 and 64,906 HGV movements per year in year 20.[5] Road transport is estimated to be responsible for 60% of all $NO_2$ emissions.[6] Moreover, it is unhelpful to calculate the air quality impact from HGVs solely using the number and frequency of movements. The age of the vehicles is fundamental to calculations, as this is the true determinant of the actual emissions that will be coming from them. A Euro V standard HGV engine is 56% more polluting in terms of NOx than a Euro VI vehicle. Similarly Euro VI PM emissions are up to half that of Euro V emissions – so unless the newest vehicles are being driven for all movements, the impact may be much more significant than accounted for. Moreover, because Euro standards only cover engines, there is no consideration of the brake or tyre dust that is also impacting the local air either. It is not stated whether these vehicles will all be the latest models, therefore much more careful consideration of the emissions from these vehicles needs to be given in order to not drastically underestimate the impact.

Consequently, it is not credible in the slightest that the additional contribution to air pollution from the proposed development, including airport-related traffic, is predicted to be "small", "slight", "moderate" or even "negligible" in different parts of the air quality chapter. To the contrary, these plans would counteract urgent plans to tackle the current air quality emergency in the UK. It is a genuine public health crisis that disproportionately affects the poorest and most vulnerable in society and costs taxpayers an estimated £20bn a year.[7] It is worth bearing in mind that Thanet's population is older than average and therefore likely to be disproportionately affected by increased air pollution.

The claim that "NOx is not believed to have impacts on human health" is at best, deliberately misleading, at worst, factually incorrect as NOx is a generic term covering various nitrogen oxide air pollutants including nitric oxide (NO) and nitrogen dioxide ($NO_2$).

**Biodiversity**

I was concerned to read about the barn owl, whose nest RSP proposes to relocate, and breeding bird species onsite, such as the skylark and grey partridge, which have conservation interest and will be affected by the proposed development. Loss of habitat is identified as one of the top reasons why the UK's wildlife species are decreasing in number. Environmental impacts of the project, both offshore and onshore, need to be looked at in much more detail. This should involve stringent monitoring, with RSP clearly outlining environmental management and monitoring measures, and for all of the collected data to be made publicly available.

[3] Jean Lambert MEP, Air Pollution: London's Unseen Killer, December 2015

[4] London Air, What is Nitrogen Dioxide [redacted]

[6] European Commission, 2016, Transport Emissions: Air pollutants from road transport [redacted]

[7] Bazian, Air pollution 'kills 40,000 a year' in the UK, says report, NHS Choices, 23 February 2016 [redacted]

This is particularly important as Manston is within 10 kilometres of six nationally designated conservation sites and eight internationally designated nature conservation sites, including the Thanet Coast Site of Special Scientific Interest (SSSI). It is particularly close to the internationally recognised Sandwich and Pegwell Bay National Nature Reserve, a complex mosaic of habitats of international importance, especially known for its bird population, including waders and wildfowl.[8] Stonelees Nature Reserve, for example, is home to a wide range of plants, such as pyramidal, common spotted and southern marsh-orchids, and insects, including bees and moths. I am currently not convinced RSP has paid sufficient regard to the adverse effect on these sites, and the wildlife, flora and fauna therein, that the proposed development will cause.

**Climate change**

As the UK's latest official statistics[9] reveal, transport represents the largest greenhouse gas emitting sector in the UK, according to the Department for Business, Energy & Industrial Strategy's latest report. Transport, including road and aviation, accounting for 27% of all emissions — seeing no reduction between 2016 and 2017, following a 2% rise the previous year. Not accounting for any airport expansion, emissions from aviation are already expected to use up more than two-thirds of the UK's carbon budget by 2050.[10] With global climate scientists stressing that we have just 11 years to halt the most dangerous consequences of climate change,[11] the UK needs to be taking action to reduce, not worsen these emissions levels.

One major frustration is the short-sightedness and backward-thinking approach of the proposed development. Any airport expansion or revival in the UK is not compatible with meeting our mandatory climate targets and domestic and international commitments. A plan to increase air freight, with connection to the local road network for onward/outbound journeys is incompatible with the shift towards more sustainable, multimodal logistics chains in order to meet EU targets to shift 30% of long distance (over 300 km) road freight to other modes by 2030. It would be much more effective and sensible to build more resilient local economies to reduce the demand for imported goods, move goods much closer to their destination by sea before unloading, as well as identify alternatives to road freight, including moving far more goods by rail and waterborne transport.

The cargo movements proposed, as a standalone, would contribute to an increase in emissions that would put the achievement of these objectives in jeopardy. Likewise, a glance at the estimates for HGV movements, as referenced in my comments on air pollution, show that RSP don't understand the urgent need to create a more efficient and environmentally-friendly freight transport system. Road transport accounts for about one fifth of the EU's total emissions of $CO_2$ (cars and vans 15%, heavy duty vehicles 6%). Despite improvements in fuel consumption efficiency in recent years, emissions remain high mainly due to increasing road freight traffic. Additional emissions would also be created by the flights and ground transport that a proposed passenger terminal would bring. A flight school and executive travel provision would again magnify the carbon impact of a reopened Manston Airport.

Increasing air cargo and investing in the associated infrastructure is likely to be very costly in the long run as other hubs and parts of the network move away from these outdated modes. Such development will subject this area of Kent to long-term negative impacts as a result, which could stretch far beyond the South East to the national and international level.

**Noise**

Noise is another particular concern given the proximity of the airport to several towns and villages. Housing in Manston village and Cliffsend can be found close to the runway and passenger terminal.

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Manston's flight path used to pass over the town of Ramsgate, a seaside town with a population of around 40,000 in close proximity to the eastern end of the runway.

According to European noise mapping, about 65% of the European population (325 million) is exposed to levels over 55 Lden (from road, rail, aircraft and industry), and nearly 20% to night-time levels that may harm their health (55 Lnight). Children chronically exposed to loud noise show impairments in attention, memory, problem-solving ability and the acquisition of reading skills.[12]

There is very little legal protection for people affected by aircraft noise because aviation is exempt from noise nuisance claims. This is the case even if an increase in airport activity or a change in flight paths causes a significant noise increase. [13] The fact that the UK Government has always avoided setting maximum noise exposure thresholds for airports, instead having adopted policy simply to 'limit and where possible reduce'[14] aviation noise impacts, causes me further concern for the wellbeing of my constituents should this harmful proposal be given the go-ahead.

The proposals, for example simply to *encourage* aircraft operators to keep noise disturbance to a minimum by operating a low power/low drag procedure subject to ATC speed control requirements and the maintenance of safe operation of the aircraft, don't go nearly far enough.

However, my biggest issue with the noise mitigation proposal is RSP's failure to commit to banning night flights. In the past, spokespeople for RSP have repeatedly denied that night flights are part of RSP's business plan. It is now clear from the documentation, and has been confirmed to the media, that night flights are in fact part of the proposals. It is utterly unacceptable for RSP only to ban "the noisiest aircraft" from night flying altogether and to set out meagre proposals to mitigate and minimise the impact of any flights of this type. Furthermore, I have been informed by concerned constituents that the plans will apparently permit night flights by a category of plane so noisy that it will not even be permitted at Heathrow.

The World Health Organisation Europe updated its night noise guidelines in 2009, recommending that night noise should not exceed 40 dB Leq at night, as night noise in particular increases the risk of strokes, dementia and heart attacks.[15] However, the UK doesn't even record night noise down to 40db Leg. In conclusion, there should be nothing less than a full night flight ban in place. Given the above concerns and shortcomings identified, I don't see the measures proposed in the Noise Mitigation Plan as being effective.

**Overstatement of business case**

When looking at the economic case put forward, I have reason to believe that the benefits have been significantly overstated, and the costs and impacts significantly understated. Costs arising from a wide range of negative environmental impacts, including greenhouse gas emissions, noise and air pollution, as well as the social costs to affected local communities and habitats, have not been taken into consideration. Air quality and carbon emissions need to be given absolute priority and outweigh any claimed economic benefits of the proposed development.

**Need for additional airport capacity**

I do not accept the claim that there is the need for additional airport capacity in the South East of England by 2030. The UK does not have an airport capacity crisis. Britain is already amongst the most frequent flyers in the world and every airport but one is operating under capacity. Airports Commission forecasts show that growth in UK demand would be met by other airports, both elsewhere in the South East, but also outside the South East, where there already exists spare capacity. Furthermore, capacity issues do not automatically translate into a genuine need to expand

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aviation - including air freight - capacity. A broader context is needed, and if that broader context is applied, the case for increasing capacity is not substantiated.

**The airport's history**
The airport's history suggests it is extremely unlikely that it could ever become a commercially viable operation. Manston Airport has consistently failed to be a viable hub for the South East and plans to reopen it distract further from serious and sustainable regeneration and job creation in Thanet. I have repeatedly pointed out in the past that predictions for the future growth of the airport were based on questionable or flawed claims – confirmed by various independent reports. Again, I believe the case put forward by RSP relies on vastly inflated job creation predictions and hinges on dubious demand assumptions.

The vision for Manston as a freight airport is not a new one. Under three private owners, freight formed a core component of the airport's growth strategy from 1989 until its closure in 2014. The fact that none of the previous operators, despite considerable investment, have managed to make a commercial success of the airport has been attributed to Manton's peripheral location and Thanet's relatively poor infrastructure connections with the rest of the UK. It is not credible that RSP expects to be able to overcome these existing obstacles.

**Air freight demand**
RSP's economic case, including job creation, relies on ambitious forecasts for the growth of air freight despite air freight tonnage having remained relatively steady for the last two decades.
The 'initial' emphasis on cargo in the RSP proposal further puts it at disadvantage. According to CAA figures, 70% of UK air freight is carried in the bellyhold of passenger aircraft, while the remaining 30% is carried by dedicated freighters. Dedicated air freight amounted to approximately 715,000 tonnes in 2016.[16] It is also worth keeping in mind that Manston Airport's freight operation at no time in its history comprised more than around 30,000 tonnes per year.

**Expected impact of Brexit**
Furthermore, the likely impact of Brexit on aviation demand needs to be taken into consideration. According to a briefing published by the International Air Transport Association[17] (IATA) in June 2016, "The immediate impact of Brexit will be most obviously experienced on the passenger segment of the air transport market. While exchange rate movements will affect the relative price of imports and exports, the near-term impact on the UK air freight market is less certain. Over the longer-term, however, there will be an impact on international trade when the UK does formally exit the EU and this, in turn, will affect air freight. For example, the OECD5 estimates that UK trade volumes could fall by 10-20% over the long run (to 2030), relative to the baseline."[18]

In addition to my concerns regarding climate change, noise and air pollution, as outlined above, there is certainly also a good reason to call for the demand for Manston Airport to be reopened to be reassessed in view of the UK's exit from the EU.

In light of the above, it is also very difficult to see why the site in conjunction with RSP's proposal should be regarded as a Nationally Significant Infrastructure Project, a requirement in order to be considered for a Development Consent Order to seize the site from its current owners.

**Alternatives**

Instead of reopening the Manston Airport site as a cargo hub, there is plenty of scope for an alternative vision of the future in Thanet, based around sectors such as leisure, agriculture and green energy. The site could be used to deliver a mixed-use sustainable development, generating new jobs

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and including green spaces and housing in Thanet so long as the plans meet the highest environmental standards. To build homes on this designated brownfield land, while at the same time contributing to the requirement in the Government's housing strategy, would be preferable to building houses on valuable agricultural land in the surroundings.

**Conclusion**

In sum, I believe that the need for the reopening of Manston Airport has not been demonstrated. The costs – in terms of financial costs, air pollution, climate, noise and community impacts have not been sufficiently taken into account and the economic benefits have been overstated.

Once the negative impacts and true costs are fully taken into account, I believe that no net benefit will arise, and therefore repeat my call for the proposed development to be rejected.

Yours sincerely,

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**Keith Taylor MEP – summary of written representation in respect of the Manston Airport DCO submitted by RiverOak Strategic Partners Ltd.**

I object in the strongest way possible to RiverOak Strategic Partners' being granted a Development Consent Order (DCO) to reopen Manston Airport and urge the rejection of the proposed development.

My objection is based on the significant and long term environmental consequences such a development would cause in terms worsening air quality, biodiversity and climate change impacts. The noise impact from the development will be significant given the proximity of the airport to several towns and villages and importantly because RSP have not stated that night flights will be banned outright.

The business case is overstated in the DCO. There is no need for additional airport capacity in SE England by 2030. The airport's history suggests it is extremely unlikely that it could ever become a commercially viable operation. RSP's economic case, including job creation, relies on ambitious forecasts for the growth of air freight despite air freight tonnage having remained relatively steady for the last two decades. Furthermore, the likely impact of Brexit on aviation demand needs to be taken into consideration – the near-term impact on the UK air freight market is uncertain.

Instead of reopening the Manston Airport site as a cargo hub, there is plenty of scope for an alternative vision of the future in Thanet, based around sectors such as leisure, agriculture and green energy. I believe that the need for the reopening of Manston Airport has not been demonstrated. The costs – in terms of financial costs, air pollution, climate, noise and community impacts have not been sufficiently taken into account and the economic benefits have been overstated. Once the negative impacts and true costs are fully taken into account, I believe that no net benefit will arise.