From:
 Manston Airport

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Subject: To the Manston Airport Application Team

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I write this as a town councillor, mental health professional, active community member and concerned resident who has lived and worked in Ramsgate for the last 20 years. I have written at length and presented on the impact on physical and mental health issues of having planes descending throughout the day and much of the night. This will effect the well-being of our residents and I do not intend to reiterate these facts in this submission

RSP are seeking 84,000 ATM's annually which would amount to a landing or take off every 10 minutes. The impact on the inhabitants will be appalling. As would the impact on our historic harbour, Georgian conservation areas and the Clock House which have recently been added to the Historic England Risk Register (October 2019).

As well as the historic environment, in an area where the health demographics are poor anyway, as they are skewed by the general poverty of the Thanet district. This environmental pollution will have greater impact on resident's physical and mental health. There are 31 schools directly under the flight path. These schools educate 9934 children, whose health and learning will be impacted detrimentally through noise and air pollution and the effect this will have on their cognitive abilities and performance. All of this is well documented in research and mentioned in previous submissions, this in an area already disadvantaged socially and financially. The Manston flight path descending at 300 metres over the harbour a mile from the end of the runway is clearly illustrated in this photograph.



The late submission of Five10Twelve on 17 th October and No Night Flights documents catalogues the inadequacies and inaccuracies of the Applicant's Overall Summary of Need case. In these documents and the report by aviation experts York Aviation the case for expanding existing facilities is made, there is no support for or indeed need for an airport at Manston. The proposal from RSP is not properly evidenced and as yet RSP has failed to provide a sound business case or indeed evidence of deliverability, sustainability and secure financial backing, this surely is a deficiency in the credibility of RSP?

A further document submitted on the 23 rd December the Five10 Twelve document entitled Public Cost and Reputational Risk discusses the work of No Night Flights over the preceding 5 years in relation to the business and personal credentials of the Applicant. This Applicant had been turned down twice by the district council on the grounds of not being a viable airport operative. This document clearly states the arguments in relation to the many failings of the applicant. This is the first DCO pertaining to an airport. As such it will be minutely scrutinised and precedents set by this process will have wider implications for any further applications and to interested parties with environmental and public health concerns. In addition to the climate change concerns which are increasingly dominant.

A further Five10Twelve document submitted on 27 th October explores the inconsistencies and inadequacies in the Applicant's Environmental statement. A disingenuous, unrealistic best case scenario is mooted by the Applicant which they do not challenge with more realistic outcomes. Once again I wish to highlight that this DCO is setting a precedent that will reflect on the Government and the Department with a view to credibility in relation to climate change issues.

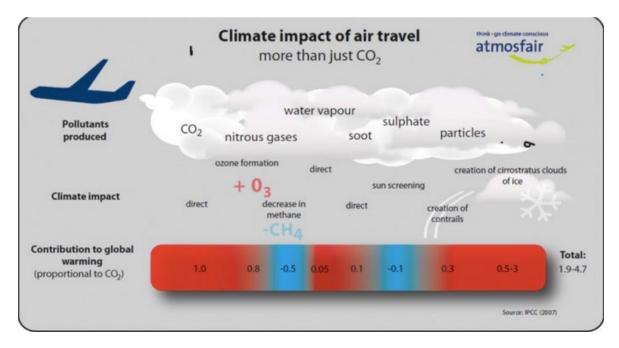
The Conservative Manifesto was clear on the importance of net zero emissions and pledging the UK to be the "first major economy to commit to ending its contribution to global warming" and lead in combatting climate change, through a statutory instrument amending the Climate Change Act 2008. The manifesto also expressed concern in relationship to improving public health, air quality, biodiversity and providing a sustainable future for the next generation. The Conservative manifesto also committed to

bringing forward new laws that will pledge the UK to net zero emissions by 2050. This commitment was based on the committee of Climate Change's advice on a date to achieve a net zero admission rate. This target is considered "necessary, feasible and cost effective" and this strategy is based on the UK's commitment to the Paris agreement.

The aviation sector currently accounts for about 2% of global emissions and is one of the fastest growing pollutants. According to projections from Manchester Metropolitan University this could double by 2050 even if planes become substantially more fuel efficient and airlines save additional carbon by optimising their operations. Less optimistic predictions could lead emissions to triple. The Environmental and Energy Study Institute acknowledges the impact of other factors that influence climate change. However passenger air travel is producing the fastest growth of individual emissions despite a significant improvement in the efficiency of aircraft and flight operations over the last 60 years.

Works air cargo although a much smaller component of aviation has a record of growth similair to passenger aviation. In 2017 freight ton kilometres increased by 9.5% to reach 220 billion tons, 1% of world trade by volume but 35% by value. This represents over 100,000 passenger and cargo flights annually in its 2019 Environmental Report. ICAO included aspirational goals for reducing impact by improving fuel efficiency by 2% annually through 2050 and ensuring carbon neutral growth from 2020 onwards. The projected rapid growth of the industry amplifies the necessity of limiting global carbon aviation emissions and non- co2 carbon effects. The growth of demand is a obvious barrier in controlling aviation emissions.

See the chart below for an explanation of the complexity of aircraft emissions. CO2 accounts for approximately 70% of the exhaust. It has an extended lifetime in the atmosphere which makes it especially potent as a greenhouse gas. After emission 30 % is naturally removed over 30 years, 50% over a few hundred and the remaining 20% over a few thousand years. The longevity of CO2 makes it particularly potent. The effects of the cirrus clouds composed of small ice crystals emanating from water vapour in the exhaust is important and has a serious warming effect. The effect is so large today that it exceeds the total warming influence of all of the CO2 emitted by aircraft since the beginning of powered flights.



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The Government needs to be seen as acting on the importance of the climate change agenda and the reinstatement of Manston as a cargo hub will only serve to exacerbate the situation and cause the Government reputational damage. The Government must be perceived to be acting both nationally and internationally. Already climate change concerns have rightly impacted on the expansion plans of both Southampton and Stansted both of these are well established airports. Their expansion is perceived as being at odds with the independent advice to Government from the Committee on Climate Change, on building a low-carbon economy and preparing for climate change.

In conclusion the Department of Transport and the Government need to consider the flaws exposed in the DCO process by this application as it is difficult to envisage a credible response from the Applicant. The incalculable damage to our community in terms of public health, the environment, our heritage, the regeneration of this area and climate change need to be weighed heavily against the inconsistencies displayed by the Applicant. An applicant whose application lacked transparency, accountability and expertise.

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