

FROM COMMUTERS AGAINST THE CARGO HUB

For the attention of the Manston Airport Case Team.

I write on behalf of Commuters Against the cargo hub in response to the DfT letter dated 11th June 2021, inviting updated information relating to the SOS's decision on the DCO for Manston Airport.

Thanet does need jobs. What it doesn't need is an airport. And, given the current climate change obligations, nor does the rest of the UK.

There have been several changes in circumstances since 7th July 2019 which directly affect Manston.

The Sixth Carbon Budget (Dec 2020) will now incorporate the UK's share of international aviation emissions. The Government has also moved its target of reducing emissions by 80% by 2050 forward to 2035.

Prime Minister Boris Johnson said: "We want to continue to raise the bar on tackling climate change, and that's why we're setting the most ambitious target to cut emissions in the world. We want to see world leaders follow our lead and match our ambition in the run up to the crucial climate summit COP26."

The SOS now has a legal duty to scrutinise the environmental impact of Manston even closer when deciding whether or not to over-ride the Planning Inspectorate recommendations and grant the DCO for Manston.

In 2019 the Planning Inspectorate report on Manston Airport concluded that re-opening of the would use up 1.9% of the UK's carbon budget.

Of the move to the UK committing to reducing emissions by 2035 Alok Sharma, President of COP26 said this: "Long term targets must be backed up with credible delivery plans."

Despite post-2019 claims by Manston developers RSP, the airport will not be the greenest in Europe. The original DCO application by RSP contains no details of the airport's planned green credentials. Neither does the developer have a credible business

plan as no business figures were presented at the DCO, despite several requests from the Inspectors.

Even if future ground operations are green, the aircraft flying out of Manston will not be.

RSP's business model for Manston is freight-first. As submissions to the DCO process show, cargo-only planes are the noisiest, least-efficient and most polluting types of aircraft - such as the Boeing 747s - which most airlines are now phasing out.

Emissions from all these aircraft must be added to the 1.9% carbon budget estimate.

Relying on low and zero emission aircraft being on the horizon have been dismissed as highly speculative. The Government's **2020 Jet Zero** plan to "look into the strategic, technical and commercial issues in designing and developing zero-emission aircraft that could enter service in 2030" has its detractors.

Absolute Zero, a 2019 report by UK fires (a collaboration between the Universities of Cambridge, Oxford, Nottingham, Bath and Imperial College London) concluded that: "Relying on breakthrough technologies to achieve zero emissions by 2050 is risky and delays action." One of the report's authors, Professor Julian Allwood from Cambridge University, added: "Commercial long-haul electric flights will not be operating at any significant scale by 2050."

"Over the next 30 years, while road vehicles, heating and industry are being electrified, there is unlikely to be spare clean power to make aviation fuel."

Meanwhile there is still plenty of work to do on the ground.

The **Government's 2020 Ten Point Plan For Green Industrial Revolution** committed, amongst many other things, to reduce road traffic emissions.

While the Govt Ten Point plan didn't give guidelines or a deadline on plans to reduce emissions from HGVs, the 2020 Transport & Environment report - **How to decarbonise the UK's freight sector by 2050** - noted that in 2019 there were around 526,000 trucks on the road causing 12% of the greenhouse gasses emitted by the transport sector in the UK.

It added: "Reducing the fuel consumption of diesel lorries, the number of empty vehicles and shift road freight to rail, will only save the UK up to 20% of road freight greenhouse gas emissions by 2050."

Manston Airport will do the opposite of what the Government promises: it will *add* to UK road traffic emissions. The airport is not served by a national fuel pipeline. This means all aircraft fuel will need to be delivered in by road.

Each aircraft that lands and takes off from Manston could add up to 12.4 fuel tanker road traffic movements to the UK's roads.

For example: a Boeing 747-8 (2010) aircraft can carry 238,118 litres of jet fuel. A 44 tonne road tanker can carry 38,000 litres.

It would therefore take 6.2 road tankers to supply fuel for a 747-8. Or 12.4 road traffic movements (to and from the airport).

The £34.5 million Thanet Parkway currently being constructed a quarter of a mile from Manston Airport has been developed with no freight handling facility. None. This means Manston Airport has no direct access to rail freight facilities. The nearest freight handling rail station is at Ebbsfleet, 54 miles away.

Every ounce of freight landed and loaded at Manston will have to be collected and delivered by HGV.

For example: A Boeing 747-8 can carry 137.7 tonnes of freight. A six axle lorry can take 44 tonnes. It would therefore take 3.13 hgvs to move a full 747 aircraft load of freight. That's a total of 6.26 road traffic movements (to and from the airport).

Fuel + freight transport for a single aircraft passing through Manston could add up to 18.66 road traffic movements.

RSP has predicted 17,000 air traffic movements per year. This could equate to up to 156, 610 extra road traffic movements per year.

RSP actually has permission for 64,000 atms p.a. At full capacity that could equate up to 597, 120 road traffic movements to the UK's road.

The 2019 Planning Inspectorate report on Manston DCO application concluded the need for extra freight capacity was modest. In other words, in order to meet targets quoted in their application, Manston developer RSP would not be taking up slack in freight capacity, it would effectively be stealing existing business from other airports which are 1/ geographically better located; 2/ on the national fuel pipeline; and 3/ have close access to rail freight facilities.

All three elements are key factors in keeping carbon emissions to a minimum. Without these, Manston's green credentials are further eroded.

2020's Brexit caused a temporary tailback of HGVs trying to clear customs before the deadline. The DfT paid £19.4 million to use Manston as an HGV post-Brexit overspill facility to ease the pressure on Dover. Over Christmas 2020 and New Year it accommodated 4, 000 lorries which were waiting to get back to Europe.

A temporary blip, as the facility is no longer needed. However, what Brexit did prove was that Manston has been more commercially successful as a lorry park - under Operation Stack and Brock - than it ever was in entire history as a commercial airport during which it lost a reported £100 million, according to a report by Kent County Council.

Which brings us back to Alok Sharma's caveat: "Long term targets must be backed up with credible delivery plans." Manston Airport proposals have neither. Every job at Manston airport will carry with the weight of carbon emissions from every inefficient aircraft and every unnecessary HGV it employs.

Thanet needs green jobs. Wind farms, solar farms, new technology, digital film studios.

There was once a proposal to develop the Manston Airport site into film studios .

The surge of interest in online streaming platforms in 2019 saw Netflix, Sky and Disney snap up UK production studios. Had developers followed the film studio route then Thanet – and Manston - would have benefitted from a 2019 production spend in the UK of £3.61bn.

TR Fennell on behalf of commuters against the cargo hub. 09/07/21