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Poor management was shown in 2001(1)- proper management, no night flights, could have been acceptable.

Proposal cannot overcome huge impacts.

EU's Environmental Principles: Precautionary, Prevention, Rectification at source, Polluter pays(9) prevent Manston.

A Air quality

Air pollution cannot increase.

B Climate change

Air transport emissions more than double the emitted CO₂, Paris Agreement requires rapid reduction of shorter-lived effects(2).

Night flights double the effect of daytime flights(3).

Department for Business, Energy & Industrial Strategy(4): "2°C global average means UK > 2°C, decreasing river flows, more deaths".

Already short of water.

"radically reduced emissions now may limit average rises, delayed action, means high costs later, with larger impacts.(5)."

Aviation emissions increasing.

Aviation Strategy includes non-CO₂ emissions (6).

No alternative fuels.

UK emissions cannot exceed 37.5 Mt.

No available "negative emissions", no capacity within limits.

Sir Howard Davies:"the more the 'carbon budget' for aviation shrinks, the more important for that budget be used efficiently as possible, vital for capacity to be available where most needed."(7).

Heathrow expansion means fewer flights elsewhere: "Government assessed compatibility of support for expansion of existing runways with UK's climate change commitments on basis that additional capacity will contribute no more than 3,000 ATMs by 2040. *Making Best Use of Existing Runways, June 2018.*"

Committee on Climate Change(CCC)(8) requires limiting demand, not 'offsetting' nor biofuels.

CCC Reports, 'Advice on the long-term strategy for UK aviation emissions', 'Advice on the UK's long-term climate change targets', need Examining.

Inadequate limits for UK- [CCC said\(10\)](#): "dangers of inaction [Intergovernmental Panel on Climate Change's 1.5°C special report](#) and [UN's Emissions Gap report](#), showed efforts towards [Paris Agreement](#) goals *substantially off-track*, [MetOffice](#) UKCP2018 assessed UK experience, [Michael Gove](#) warned: on course for alarming 3°C; *current national pledges insufficient* for 1.5°C.

[Likewise Clean Growth Strategy-](#) *policies do not yet match the ambition.*

[UK is off track to meet the fourth and fifth carbon budgets.](#)

[Early assessment of the UK's National Adaptation Programme](#) fails the UK".

Poor people are more affected by Climate Change affecting Human Rights/Equalities.

D Funding

Applicant must fund transport improvements for airport(11).

Network Rail shows no extra trains.

E Habitats

Loss of biodiversity and habitats breaching the Conservation of Habitats and Species, Directives on Habitats and Wild Birds, because 'POW' judgment on Habitats Directive (CJEU's People Over Wind decision, 12 April 2018, C-323/17).

F

G

H Need

1. Policy

Wikipedia: "Manston is closed", so Application is for 'new' airport and RPS agrees.

National and Local Policies propose no new airports, Airports NPS supports increasing use existing airports but not new airports.

No evidence for DCO.

3 Manston

UK Air Transport Movements(12) highest in 2007, 2,379,000, 2017 achieved 2260000, and 2018, 2,210,000. Plenty of ATM capacity at other airports.

Except Heathrow and Gatwick, airports not "full", seek more traffic.

2007 freight tonnage(13) 2,158,571 tonnes. Master Plans showed:

2015 planned increase 2,231,197 tonnes: total 4,389,768 tonnes.

2030 planned 4,470,362 tonnes increases total: 6,628,933 tonnes.

2015 achieved 2,299,328 tonnes, growth 140,757 tonnes, fraction of 'planned' growth 2,231,197.

So capacity in Master Plans.

15-20 tonnes of air cargo worth 30-40 economy passengers, on passenger planes(14).

Belly hold cargo- if fewer passengers, cargo makes up difference.

Cargo aircraft load factors(LF) 50%, but passenger LF 80%(15), increasing costs/tonne.

Kent NE tip poor location for London, midlands, with small flying population or suppliers/users of freight, locally.

4 Competition

Manston competing with existing airports, difficult for new startup.

Doorstep competition from high speed rail to Europe, Chinese cargo trains.

High risks from dependence for 56% UK's freight on Dover cross channel transport(16); more road traffic would greatly increase road congestion.

I Noise

1. Effects

Noise unwanted unless in plane, or the industry.

Aircraft noise objectionable, WHO(17) show air transport with lowest maximum levels.

Sound uses decibels (dB), logarithmic ratio between two sound levels. Two sounds each 30 dB, added=33 dB. “Twice as loud” meaningless.

“A-weighting” reduces low frequency sounds, increases higher frequencies- manufacturers shift noise to lower frequencies. C-weighting should be used, but A-weighting used, tonality ignored, hence measured levels and communities' perception do not match.

Heathrow Terminal 5 Inspector(18) agreed Leq A dB does not relate to people's perceptions and minimises impact of movements increases.

“Night Flying Restrictions at Heathrow, Gatwick and Stansted, Stage 1”, July 2004, Paragraph 3.12, agreed WHO *Guidelines* be adopted for long term targets for improving human health. The WHO values for Night noise then 45 dB Leq (8 hr).

WHO, 2018(17) recommendations 5 dB lower at night, strongly recommend reducing noise below 45 dB Lden, night levels below 40 dB Lnight, when 11% of participants still highly sleep-disturbed .

“Aviation 2050” requires “stronger and clearer” framework, better incentives for reductions, noise caps.

CAA noise limitation scheme(20) provides national cap on airport noise for England, individual airport caps.

Controls may be insufficient to avoid serious adverse effects.

2 The Noise Mitigation Plan (NMP)

NMP missing plans for future noise reductions, periodic reviews and Air Navigation Guidance(21).

The NMP Quota Count (QC) 3,028 worse than 1,995 in 2009 regime rejected by Thanet Council. NMP fines lower than 2009, fraction of Heathrow's.

Heathrow 2017 QC limits reduced over 40%(19), expected:“ban on scheduled night flights of six and a half hours”.

Night Flight Restrictions(19)- currently exempt movements will count towards airports' movement limits. QC/0.125 category will apply to exempt aircraft. Hence ALL aircraft counted within the Movement Limit in Eight hour night period, and QC system include QC 0.125, 81 – 83.9 EPNdB.

The NMP refers to LASmax a “Slow” measurement, averaging peak noise level, but peak noise level wakes people up, should use EPNdB as in QC.

Part 2 of NMP is mess – first QC column has <54, <64, <84, >84 and all headings meaningless terminology.

No charges in NMP for quieter and lower emission aircraft. CAA(22) recommended “Good practice principles” - should have environmental charges.

2. Cumulative effects

Cannot control aircraft flying over Kent - need major airspace change but NATS timetable delayed, unknown impacts from airspace after Examination.

5 Location of monitors

Noise monitors need to avoid high background noise(25).

Heavier and noisier planes 2 to 3 dB noisier(24), steeper departure reduces noise under flight path, increases at

side, lasts longer. Need monitors under flight path and sides.

6

7 Previous airport

Noise levels from Fokker 100 passenger aircraft overhead caused significant noise in Ramsgate centre, large number disturbed, spoilt people's enjoyment, spoilt learning environment(25).

Analysis showed fall between 4,000Hz - 8,000Hz, Speech (250 - 4,000Hz) intelligibility disrupted.

Rural location noise substantially above background, countryside users likely to be disturbed.

8 Modelling

Heathrow Terminal 5 Inquiry explained inadequacy of the A weighted Leq(18).

J Operational issues

1. Airspace Change Process

Airspace change very concerning. Performance Based Navigation (PBN) reduces corridors, centre line many more planes unlike previous distribution.

Delays obtaining agreement likely.

2.

3.

4. Night flights

For any night movements, consider effects of increased nocturnal HGV and other vehicle activity.

K Other environmental issues

1. Baseline data

2. Worst case

Single runway doesn't restrict ATMs. Manston's capacity 282,000.

2hr turn-around possible(25,26).

With no conditions assess at 282,000.

Nothing to stop Manston expanding without cap.

Assess worst aircraft in NMP Appendix. Assess Climate Change with least efficient aircraft.

Maximum possible ATMs for HGVs, etc:

i Maximum ATMs, smallest noisiest, least efficient freight aircraft,

ii Maximum ATM's, largest, noisiest, least efficient cargo aircraft,

iii Maximum ATMs, largest, noisiest, least efficient passenger aircraft, 10,000 largest, noisiest, least efficient cargo ATMs.

[Plus Fuel deliveries, 40,000litres tanker, European Environment Agency's 'Corinair' data fuel consumption.](#)

3.

4.

5.

6. Flooding

Applicant covers site flooding - not sea flooding.

Wantsum rose 4.8 m in 1953, three day closure roads and railways but flood risks now higher, Greenland ice melting could raise sea 7 metres(27), far too little being done (CCC28).

Flood risk factors add another 1.2 m Thanet very vulnerable.

Impermeable areas increased by 71 ha- loss of carbon absorption.

7.

8. Health

Tranquil areas vital(29), [green space worth £300/person/year\(30\).](#)

[Robust and efficient decision needed for best use of scarce resources\(31\).](#)

9.

L Economics

1. Tourism

2017 Tourism Deficit was £22.3 billion(33) equals loss of community benefits.

33 inbound tourists' support one job- 33 million outbound tourists destroys million jobs here.

2.

3. Employment

Aviation jobs were: 2003: 200,000, 2011: 150,000, 2017: 124,000 (ABS).

UK airlines(35), 2007 employment 85,864 ,2017: 79,464, only pilots increased.

1998 - 2004, 30% rise in air passengers, but employment went down.

Claims that airports create 'indirect', 'induced' and 'catalytic' jobs based on dubious statistical concepts(36).

Analysis must avoid double counting(37), no causal link between connectivity and economic growth, one airport growing diminishes other airports.

UK jobs/ATM suggests 10,000 ATMs=400 jobs.

4

5. Communities

Community benefits miniscule fraction of impacts.

No aviation taxes, Government loses £10 bn/year, APD £3.3 bn, fraction of external costs (38,39)- Community loses.

Taxation provides community benefits(40).

ExA should require environmental charges(41).

Airport pollution prevents development in Thanet, Canterbury, Dover(42).

Airport benefits better-off damages less well-off(1).

M Traffic

Lower Thames Crossing increases traffic, with Manston, roads less efficient, more negative impacts.

New roads generate traffic(43).