

**From:** [REDACTED]  
**To:** [Manston Airport](mailto:ManstonAirport@planninginspectorate.gov.uk)  
**Subject:** Re: clarification about the dispersion  
**Date:** 11 March 2019 11:57:17  
**Attachments:** [image001.png](#)  
[image001.png](#)

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Hi Manston Airport Case Team.

I am drawing your attention to today's BBC news item about air pollution <https://www.bbc.co.uk/news/uk-47520848>

The pertinent part is the Public Health England (PHE) recommendations

The PHE review also recommends:

- Redesigning cities so people aren't so close to highly polluting roads by, for example, designing wider streets or using hedges to screen against pollutants
- Investing more in clean public transport as well as foot and cycle paths
- Encouraging uptake of low emission vehicles by setting more ambitious targets for installing electric car charging points
- Discouraging highly polluting vehicles from entering populated areas with incentives such as low emission or clean air zones

When viewed in the context of burning more than 30,000 tonnes pa of jet engine fuel on or near the ground at Manston and that. PHE said 28,000 to 36,000 deaths a year in the UK could be attributed to long-term exposure to air pollution. I think it becomes relevant to the DCO.

Best regards Michael

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<http://thanetonline.blogspot.co.uk/> My general pictures and writing

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-----Original Message-----

From: Manston Airport <ManstonAirport@planninginspectorate.gov.uk>  
To: [REDACTED]  
CC: manstonairport@pins.gsi.gov.uk <manstonairport@pins.gsi.gov.uk>  
Sent: Mon, 25 Feb 2019 14:49  
Subject: RE: clarification about the dispersion

Dear Mr Child

Thank you for your email.

The process is inquisitorial. The Examining Authority (ExA) has read your Deadline 1 submission and will ask questions arising from its content as it considers necessary. The next suite of written questions is scheduled to be published on 5 April 2019.

If you wish for your below email to be put before the ExA and considered for acceptance as an additional submission please confirm by response.

Kind regards

The Manston Airport Case Team

**From:** [REDACTED]  
**Sent:** 25 February 2019 11:28  
**To:** ManstonAirport@pins.gsi.gov.uk  
**Subject:** Re: clarification about the dispersion

Hi Manston Case team at pins

I still haven't had any response to my questions about particulate dispersion distances made both to pins and RiverOak rsp on numerous occasions, including a deadline 1 submission.

I have tried to search the post application documents, but like the application itself it doesn't have a dedicated and reliable search facility or comprehensive index. Because the pins application isn't published as a normal website in html but as a series of pdf documents this makes it almost invisible to search engines like Google. This means the word particulate only brings up 3 matches, my own submission no appearing at all. The application as published on the pins website brings up no matches for the word particulate.

To be absolutely clear with this pm10s disperse (fall to the ground) within about 1km of the burn that generated them and pm2.5s travel much further as airborne matter and certainly further than the Thanet coastline.

RiverOaks various environmental documents all appear to have made the fundamental error of using the same dispersion distance for pm 2.5s they used for the much larger pm10s i.e. about 1km and basically not much further than the proposed airport perimeter.

Using this wrong figure has resulted in a figure of only 1 death in Thanet from particulate matter whereas using the correct dispersion distance for pm2.5s would suggest a considerable increase.

Broadly RiverOak documentation appears to agree with current information about pm2.5s, which indicates an increase of 10 µg/m<sup>3</sup> equates to premature death or the early onset dementia around in 20%. Of the population.

20% of the Thanet population would be. around 30,000 people.

Here in Thanet the problem with an airfreight hub with more than 10,000 movements per year, which would burn more than 30,000 tonnes of kerosene on or near the ground at Manston, would be exacerbated by the onshore sea breezes holding the air pollution in the main concentrations of population.

Obviously if both the applicant and pins don't check to ensure that they are using the right dispersion distance for pm2.5s and make any necessary modification to the application then in the light of my continued and publicly documented observations could bring what was probably an error into the area of negligence. This could open the way for litigation from both victims of the diseases and the deceased dependent relatives.

I also feel that it is unreasonable to receive no explanatory response about the 2.5pm dispersion distance from the applicant, despite asking on numerous occasions over a considerable period of time, as this wastes my time, particularly in checking over multiple documents and I should like to claim compensation for this wasted time.

Effectively from my point of view, I have had no answer but am left with the possibility that I may have been answered somewhere in around 500 complex and unindexed documents.

In terms of not being able to make an oral representation, telephone pins or the applicant, due to my [REDACTED], I don't think this should put at a disadvantage to the point of just being ignored.

Best regards Michael

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-----Original Message-----

From: Manston Airport <[ManstonAirport@pins.gsi.gov.uk](mailto:ManstonAirport@pins.gsi.gov.uk)>

To: [REDACTED]

Sent: Fri, 4 Jan 2019 11:42

Subject: RE: clarification about the dispersion

Dear Mr Child

Thank you for your email.

Members of the case team do not read oral representations on behalf of Interested Parties unable to attend hearings.

[Section 96 of the Planning Act 2008](#) sets out that those who cannot attend a hearing can submit the content of their oral representation in writing in order to be read by the Examining Authority and included in its Examination; submitting an oral representation in writing carries the same weight as having it read out at a hearing.

Therefore, the attached submission shall be accepted as a submission for Deadline 1 - Written summaries of oral submissions.

Alternatively, you may wish to contact a group that shares your views and ask them to read out your submission on your behalf.

Kind regards

Manston Airport Case Team



Temple Quay House, Temple Quay, Bristol BS1 6PN  
Helpline: 0303 444 5000  
Email: [ManstonAirport@pins.gsi.gov.uk](mailto:ManstonAirport@pins.gsi.gov.uk)

Web: <https://infrastructure.planninginspectorate.gov.uk/> (National Infrastructure Planning)

Web: [www.gov.uk/government/organisations/planning-inspectorate](http://www.gov.uk/government/organisations/planning-inspectorate) (The Planning Inspectorate)

Twitter: @PINSgov

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**From:** [REDACTED]  
**Sent:** 02 January 2019 14:42  
**To:** Manston Airport  
**Subject:** Re: clarification about the dispersion

Dear Manston Airport Case Team

I would like to go with option 2 and have attached a draft submission, I have done this in MS Word but can send it to you in another format if that is easier for you.

Speaking at a busy open floor hearing is likely to end badly because of [REDACTED]. I also have considerable commitments at the moment.

I assume that as this is a disability related accessibility issue you will offer a small amount of support. What I would like is for the member of your team who is going to read it out on my behalf to read it first and confirm they understand it. The document should have two images in it. If there are aspects of it that need changing to make it easy to read out loud please let me know and if there are any factual errors please let me know.

Best regards Michael  
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-----Original Message-----

From: Manston Airport <[ManstonAirport@pins.gsi.gov.uk](mailto:ManstonAirport@pins.gsi.gov.uk)>

To: [REDACTED]

CC: [manston@communityrelations.co.uk](mailto:manston@communityrelations.co.uk) <[manston@communityrelations.co.uk](mailto:manston@communityrelations.co.uk)>; [manstonconsultation@bdb-law.co.uk](mailto:manstonconsultation@bdb-law.co.uk) <[manstonconsultation@bdb-law.co.uk](mailto:manstonconsultation@bdb-law.co.uk)>; Manston Airport <[ManstonAirport@pins.gsi.gov.uk](mailto:ManstonAirport@pins.gsi.gov.uk)>

Sent: Wed, 19 Dec 2018 17:06

Subject: RE: clarification about the dispersion

Dear Mr Child

Thank you for your email.

The next opportunity to engage with the Examination in respect of this matter is either:

1. By speaking at one of the Open Floor Hearings (OFH) scheduled on 10 and 11 January 2019; or
2. If you are unable to attend an OFH, by making a written submission to the Examining Authority setting out the representation you would have made orally at an OFH; or
3. By making a Written Representation to Deadline 3 in the Examination Timetable (8 February 2019).

The Examining Authority will ask questions in the course of the Examination informed by relevant and important matters contained within the written and oral representations received.

Your comments have not been passed to the Examining Authority at this stage.

In consideration of the options set out above, please confirm how you would like to proceed by way of response.

Kind regards

Manston Airport Case Team  
National Infrastructure Planning | Case Manager



Temple Quay House, Temple Quay, Bristol BS1 6PN  
Helpline: 0303 444 5000

Web: <https://infrastructure.planninginspectorate.gov.uk/> (National Infrastructure Planning)

Web: [www.gov.uk/government/organisations/planning-inspectorate](http://www.gov.uk/government/organisations/planning-inspectorate) (The Planning Inspectorate)

Twitter: @PINSgov

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**From:** [REDACTED]  
**Sent:** 11 December 2018 16:46  
**To:** Manston Airport  
**Cc:** [manston@communityrelations.co.uk](mailto:manston@communityrelations.co.uk); [manstonconsultation@bdb-law.co.uk](mailto:manstonconsultation@bdb-law.co.uk)  
**Subject:** clarification about the dispersion

Dear Manston pins team.

I am having an issue with slowing responses from RSP with relation to clarification of what I believe is a fundamental error in their environmental assessment relating to particulate air pollution dispersion.

I assume that it is generally accepted that PM2.5 particulates produced by fuel burn travel much further through the air than PM10 particulates. I am assuming this in the same way as if you drop a brick and a feather out of your window, the brick lands on the ground first.

In their environmental assessment results RSP either have PM2.5s travelling the same distance as PM10s or in one case actually travelling a shorter distance. They have confirmed that there are not other parts of their application where this anomaly is resolved with the links in their last email to me.

I would think it reasonable to assume that the PM2.5 particulates from the main source of the burn, 10,000 movements PA, will have considerable public health impacts in all of the concentrations of population within 10km of Manston and this will be accentuated in the coastal towns where the prevailing wind from Manston meets the onshore breeze.

There is a sense in which RSP withholding the dispersion distance they have taken for PM2.5s could be taken as unreasonable behaviour, from my point of view though they are wasting my time, something I don't have a lot of to spare the moment.

What I am asking for from them is simple information for PM10 and PM2.5 particulates. The distance they have taken for dispersion to background levels, either in the form of a graph or in distance.

As this is such an important figure and key to projected reduced mortality figures, figures related to earlier onset of dementia and other issues already outlined in RSP's environmental assessment I am concerned that if the information is misrepresented the potential for future litigation may be considerable.

Does there come a point where pins will ask the question on my behalf, or do I just keep asking RSP repeatedly?

My previous emails to RSP below.

Best regards Michael

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-----Original Message-----

From: michaelchild [REDACTED]  
To: manston <[manston@communityrelations.co.uk](mailto:manston@communityrelations.co.uk)>  
CC: manstonairport <[manstonairport@pins.gsi.gov.uk](mailto:manstonairport@pins.gsi.gov.uk)>; manstonconsultation <[manstonconsultation@bdb-law.co.uk](mailto:manstonconsultation@bdb-law.co.uk)>  
Sent: Mon, 3 Dec 2018 13:07  
Subject: Re: clarification about the dispersion

Hi RiverOak, Manston Airport Consultation Team.

Many thanks for your prompt reply.

I have already studied these documents and assumed there must be something else I had missed elsewhere in the application.

I am assuming that you understand that there is a very large difference between the distance pm10s and pm2.5s travel when airborne.

Any simple non scientific explanation will express this.

Here is a link to the explanation on the US Environmental Protection agency website

[https://cfpub.epa.gov/roe/indicator\\_pdf.cfm?i=19](https://cfpub.epa.gov/roe/indicator_pdf.cfm?i=19)

And the relevant quote from it.

“Particles within the two size ranges behave differently in the atmosphere. PM2.5, or fine particles, can remain airborne for long periods and travel hundreds of miles. Coarse particles, or the subset of PM10 that is larger than 2.5 µm, do not remain airborne as long and their spatial impact is typically limited because they tend to deposit on the ground downwind of emissions sources.”

The various figures you quote for PM2.5s seem to take the dispersion distance from the fuel burn to be about 1 km max i.e. the distance for PM10s.

So to repeat with further clarification.

“I am seeking clarification about the dispersion figures you are using for airborne particulates, this would normally be expressed as µg/m<sup>3</sup> against km from source, often presented in the form of a graph, could you kindly give me the figures you are using both for PM10 and PM2.5 particulates.”

I will be happy with the figure you are using for both PM10s and PM2.5s in km from the point of burn to 10% above background level if you are unable to provide dispersion graphs for both particle sizes.

Please note I have [REDACTED] that make it difficult for me to use the telephone or write on paper, so email or face to face is my preferred form of contact.

Best regards Michael

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-----Original Message-----

From: [manston@communityrelations.co.uk](mailto:manston@communityrelations.co.uk) <[manston@communityrelations.co.uk](mailto:manston@communityrelations.co.uk)>

To: [REDACTED]

CC: [manstonairport@pins.gsi.gov.uk](mailto:manstonairport@pins.gsi.gov.uk) <[manstonairport@pins.gsi.gov.uk](mailto:manstonairport@pins.gsi.gov.uk)>; [manstonconsultation@bdb-law.co.uk](mailto:manstonconsultation@bdb-law.co.uk) <[manstonconsultation@bdb-law.co.uk](mailto:manstonconsultation@bdb-law.co.uk)>; [manston@communityrelations.co.uk](mailto:manston@communityrelations.co.uk) <[manston@communityrelations.co.uk](mailto:manston@communityrelations.co.uk)>

Sent: Thu, 29 Nov 2018 12:33

Subject: RE: clarification about the dispersion

Dear Mr Child,

It is not clear to us whether the “dispersion figures” you ask for are graphs used for calculating concentrations, or a means of presenting the calculated concentrations, and so we respond on both of these points below.

If the first: we have not used a simple concentration/distance relationship to calculate concentrations. Instead, we use a software tool called ADMS, which calculates the transport and dispersion of pollution taking into account different wind speeds and directions as well as different amounts of turbulent mixing in the atmosphere from hour to hour. It uses five years of historical weather data, measured at the Manston Met Office station. This provides a high degree of accuracy in our forecast results.

If the second: Presenting concentrations as a line graph as a function of distance from the source is sometimes done for certain types of assessment, such as accidental releases of hazardous material to air from a point source. However, presenting results like this does not account for the difference in wind direction over the course of a year. For an accidental release, which is of short duration, it is common to make the worst-case assumption that the wind is blowing towards the sensitive receptors for the whole duration of the release. For sources where emissions occur throughout the year, such as at Manston Airport, this is not a sensible assumption.

In addition, the emissions from Manston Airport will come from several moving sources spread over several square kilometres, so the concept of “distance from the source” does not work well in this case.

Therefore, the usual graphical way of presenting the effects of dispersion is as contour plots of concentration. The concentration in ug/m<sup>3</sup> at a given location (e.g. a residential property) can be read off the contour plot and compared against the legal limits or health guidance recommendations. Suitable contour plots for PM<sub>10</sub> and PM<sub>2.5</sub> are given in the Environmental Statement (ES) as Figures 6.16 to 6.19 (which can be found here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-002414-5.2-4%20-%20Environmental%20Statement%20-%20Figures%20-%205%20of%207%20-%20Figures%204.1-9.6.pdf>). These are in addition to the tables of concentrations at specific locations, chosen to include places where people are most likely to be exposed, also included in the ES – see Sections 6.8 to 6.10 of the ES for those locations where the impact is greatest, and Appendix 6.5 for the full set of modelled locations. (Section

6.8 to 6.10 can be found here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-002407-5.2-1%20-%20Environmental%20Statement%20-%20Main%20Text%20-%20Chapters%201-10.pdf> , and Appendix 6.5 here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-002418-5.2-6%20-%20Environmental%20Statement%20-%20Volume%206%20-%20Appendices%201.4-7.2.pdf>.)

Regards,

RiverOak Strategic Partners  
Manston Airport consultation team  
0800 030 4137

**From:** [REDACTED]  
**Sent:** 26 November 2018 21:20  
**To:** [manston@communityrelations.co.uk](mailto:manston@communityrelations.co.uk)  
**Cc:** [manstonairport@pins.gsi.gov.uk](mailto:manstonairport@pins.gsi.gov.uk); [manstonconsultation@bdb-law.co.uk](mailto:manstonconsultation@bdb-law.co.uk)  
**Subject:** clarification about the dispersion

Hi I have been told by pins the when “seeking clarification about the content of the environmental assessment, please contact the Applicant”

I am seeking clarification about the dispersion figures you are using for airborne particulates, this would normally be expressed as  $\mu\text{g}/\text{m}^3$  against km from source, often presented in the form of a graph, could you kindly give me the figures you are using both for PM10 and PM2.5 particulates.

Best regards Michael

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