

Cathy Rogers
Resident of Ramsgate
14 June 2019

Dear Sirs,

Ref: 20014824

Further to my response to the Proposed air cargo freight hub at Manston by Riveroak Strategic Partners on 15 February 2019 I would like to yet again re-inforce my opposition to this proposed development.

As stated before, I live Ramsgate and live under the proposed flight path. Ramsgate is a fantastic place to live, both in terms of natural environment, a wonderful community of people and unique heritage including the built environment as seen in our 900 listed buildings (alongside others not listed) and has a blooming tourist industry.

Having reviewed the outcome of the recent local hearings (3-7 June) I am again addressing my concerns in terms of climate change and the protection of our health and wellbeing through our environment. The acceptance of this proposal will be devastating for the 70,000 residents of Ramsgate, Herne Bay and surrounding villages not to mention the associated impact on the other 65,000 Thanet residents. Many will feel forced to move out of their homes.

There are many, many, elements to protest against in RSP's application; the lack of acknowledgment of the effects on school children in terms of learning and their health with little regard to this from the applicant; the generalised unsubstantiated calculations on job creation using airports as comparators whose major business is the movement of passengers and of course the lack of transparency on funding and business planning, not to mention no assessment on the viability of the project.

To update my previous submission, I urge the Examining panel to review the recent changes by the government to the Climate Change Act, passing law to ensure net zero greenhouse gas emissions by 2050 in relation to the proposal for an air cargo freight hub at Manston.

Response to Climate Change Emergency

Since the open hearings between 3-7 June, on Wednesday 11 June the Prime Minister announced a major amendment to the 2008 Climate Change Act:

“The UK is to enshrine a 2050 net zero emissions target in law, with an amendment to the Climate Change Act introduced on Wednesday.”

<https://www.climatechangenews.com/2019/06/11/uk-enshrine-2050-net-zero-emissions-target-law/> accessed 14 June at 15:54

“The UK already has a 2050 target - to reduce emissions by 80%. That was agreed by MPs under the Climate Change Act in 2008, but will now be amended to the new, much tougher, goal.

The actual terminology used by the government is "net zero" greenhouse gases by 2050.

That means emissions from homes, transport, farming and industry will have to be avoided completely or - in the most difficult examples - offset by planting trees or sucking CO2 out of the atmosphere.”

<https://www.bbc.co.uk/news/science-environment-48596775> accessed 14 June at 15:54

The comment made by RSPs’ QC during the hearings last week stated that even though Manston would not meet emission targets set out in the 2008 Climate Change Act, it wouldn’t be a problem as they could be offset by initiatives elsewhere in the country. However, this is not to be the case.

In a letter to MP Chris Skidmore Interim Minister of State for Energy and Clean Growth, Lord Deben, Chair of the Committee on Climate Change (advisors to the government) stated that there will be no carrying forward of emissions surplus from carbon budget 2 to carbon budget 3. (Letter attached).

<https://www.theccc.org.uk/publication/letter-carry-forward-of-surplus-emissions-lord-deben-to-chris-skidmore-mp/>

In an announcement on 11 June 2019, Lord Deben issued a statement saying:

“We are delighted that the government has agreed to put a 2050 Net Zero target for all greenhouse gases to a parliamentary vote. I look forward to the same cross-party consensus that we saw in 2008, when the Climate Change Act became law.¹

*This is just the first step. The target must now be reinforced by credible UK policies, across government, inspiring a strong response from business, industry and society as a whole. **The government has not yet moved formally to include international aviation and shipping within the target, but they have acknowledged that these sectors must be part of the whole economy strategy for net zero.** We will assist by providing further analysis of how emissions reductions can be delivered in these sectors through domestic and international frameworks.”*

<https://www.theccc.org.uk/2019/06/11/response-to-government-plan-to-legislate-for-net-zero-emissions-target/> accessed 14 June 16:26

In light of the rapid awareness to the state we are in globally in regard to climate change it’s not good enough for the applicant to state that *“The climate change risk assessment to be completed post-DCO approval”* they need to be assessed on their commitment and intention

¹ A Statutory Instrument was laid in Parliament to amend the Act on 12 June 2019.

<https://www.parliament.uk/business/news/2019/june/government-gives-details-on-setting-a-uk-net-zero-emissions-target/>

rather than be able to defer. (CC 1.1, p2 of the Applicants Answers to Third Written Questions, 28 May 2019)

In light of the climate emergency that we all face today I cannot see how a new air cargo freight hub can be built and opened when there is clearly little evidence of need, lack of transparency on funds and investors and lack of viability of such a project. The climate change threat is not going away and I urge you to consider, as I am aware you are, the weighting of the benefit of this project to offshore private investors against the impact on the health and wellbeing of the community of Thanet, and its environment.

Attachments:

1. Letter dated 7 June 2019 from Lord Deben to MP Chris Skidmore
2. Letter dated 12th February 2019 from Lord Deben to Chris Grayling MP Secretary of State outlining what the aviation industry must do to comply with the Paris Agreement and reduce emissions (this is before the change to law to increase to net zero greenhouse gas target). Note paragraphs below:

Our present planning assumption, which underpins the fifth carbon budget and the current 2050 target, is that UK aviation emissions in 2050 should be around their 2005 level (i.e. 37.5 MtCO_{2e}). Your acceptance of this planning assumption in the consultation is a very welcome step. The final white paper should further clarify that this will be met on the basis of actual emissions, rather than by relying on international offset credits.

Aviation emissions in the UK have more than doubled since 1990, while emissions for the economy as a whole have fallen by around 40%. Achieving aviation emissions at or below 2005 levels in 2050 will require contributions from all parts of the aviation sector, including from new technologies and aircraft designs, improved airspace management, airlines' operations, and use of sustainable fuels. It will also require steps to limit growth in demand. In the absence of a true zero-carbon plane, demand cannot continue to grow unfettered over the long-term.

We welcome your proposal to ask the National Infrastructure Commission (NIC) to scrutinise the needs case for further airport expansion.

Chris Skidmore MP
Minister of State for Universities, Science, Research and Innovation
1 Victoria Street
London
SW1H 0ET

6 June 2019

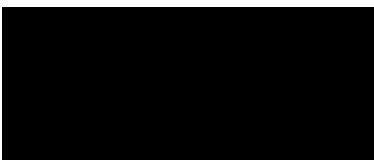
Dear Minister,

Thank you for your letter of 6 June.

As you know, the position of the CCC remains that surplus emissions in the second carbon budget period were not due to policy – and I note your acceptance of our advice that the surplus should not be used to reduce the ambition of Carbon Budget 3.

In that context you have requested further advice on technical changes to the baseline used to measure emissions. I am aware of forthcoming changes to the emissions inventory related to peatland and global warming potentials and I will now consider how my Committee can answer your request.

Yours,



Lord Deben
Chairman, Committee on Climate Change

The Rt Hon Chris Grayling MP
Secretary of State for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

12 February 2019

Aviation 2050 – The future of UK aviation

Dear Secretary of State,

I am writing to you to provide my Committee's views on your recently published consultation, *Aviation 2050 – The future of UK aviation*.

The UK's currently legislated 2050 target is to reduce economy-wide greenhouse gas emissions by at least 80% from 1990 levels. Since the Climate Change Act became law, the UK has ratified the Paris Agreement, implying even stronger action. You will be aware that my Committee has been asked by Ministers to offer advice on the implications of the Paris Agreement for the UK's statutory framework, including when 'net-zero' emissions can be achieved. A stronger UK target would require more effort from all sectors, including aviation. We intend to provide an updated view on the appropriate long-term ambition for aviation emissions within our advice on the UK's long-term targets. We will publish our report in spring. Following that, we will write to you directly to set out the implications for the Aviation Strategy.

Our present planning assumption, which underpins the fifth carbon budget and the current 2050 target, is that UK aviation emissions in 2050 should be around their 2005 level (i.e. 37.5 MtCO₂e). Your acceptance of this planning assumption in the consultation is a very welcome step. The final white paper should further clarify that this will be met on the basis of actual emissions, rather than by relying on international offset credits.

Aviation emissions in the UK have more than doubled since 1990, while emissions for the economy as a whole have fallen by around 40%. Achieving aviation emissions at or below 2005 levels in 2050 will require contributions from all parts of the aviation sector, including from new technologies and aircraft designs, improved airspace management, airlines' operations, and use of sustainable fuels. It will also require steps to limit growth in demand. In the absence of a true zero-carbon plane, demand cannot continue to grow unfettered over the long-term.

Our analysis, and that of industry, suggests the largest contribution to reducing aviation emissions will come from new technologies and aircraft designs. Research we have commissioned jointly with your department, which was published alongside the

consultation, indicates that many of these developments are likely to be cost-effective, given their potential fuel savings. The final white paper should build on the approach set out in the Aerospace Sector Deal and Future Flight Challenge, and set out a clear strategy to ensure these technology solutions are developed and brought to market in a timely fashion.

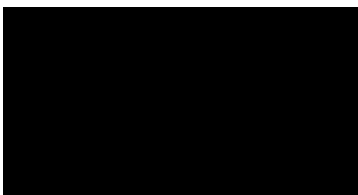
In our recent Biomass review¹ we advised that government should not plan for high levels of biofuel use in aviation in the long-term, given uncertainty about sustainable biomass supply and cost-effectiveness. Production of aviation biofuel will likely need to be in conjunction with carbon capture and storage (CCS) to be competitive with competing uses for biomass (e.g. in industry, electricity generation, or hydrogen production). A pragmatic planning assumption would be to aim for up to 10% biofuel use in aviation in 2050. In the period to 2030 government policy should aim to develop a market for aviation biofuels produced in genuinely CCS-ready facilities, and should facilitate this by achieving more of the 2030 Renewable Transport Fuel Obligation through aviation fuels.

We welcome your proposal to ask the National Infrastructure Commission (NIC) to scrutinise the needs case for further airport expansion. The consultation paper also states other conditions must be met prior to further expansion. The work of the NIC is already consistent with the requirements of the Climate Change Act and the government's climate change commitments; the final white paper should clarify that this will continue to be the case.

We also welcome the commitment to negotiate in the ICAO a long-term goal for global international aviation emissions that is consistent with the Paris Agreement. The ICAO's current carbon policy, CORSIA, has an end date of 2035 and will need to be based on robust rules that deliver genuine emission reductions. A new long-term objective would provide a strong and early signal to incentivise the investment in new, cleaner, technologies that will be required for the sector to play its role in meeting long-term targets. This is particularly important in aviation given the long lifetimes of assets. A similar approach has been agreed for global shipping emissions in the IMO, which has set a target for greenhouse gas emissions to be at least 50% below 2008 levels by 2050.

I note that your consultation commits to regular updates of the Aviation Strategy. These regular reviews will provide an opportunity to respond to a future decision by Parliament to meet the UK's commitments under the Paris Agreement. I hope the final white paper will set more specific time-points for these reviews, and align them to developments in government climate strategy overall.

Yours,



Lord Deben
Chairman, Committee on Climate Change

¹ CCC (2018) *Biomass in a low-carbon economy*