



TR020002 - Manston Airport Deadline 9

Thanet Green Party submission to PINs - reference: 20014332

Noise Contours – Having examined the noise contours published by RSP, and compared them with those recently produced by the CAA having been commissioned by No Night Flights. RSP are proposing to compensate 275 houses within a 63dB contour, paying out £10,000 to each. However, it is noticeable that other airports such as Heathrow and London City are for example using a 57dB LAeq 16h noise contour to begin tiered payments. Heathrow expansion planning has set aside £700m for 16,000 homes in the surrounding area.

Compared to the previous operations at Manston when there was a maximum of around 5,000 ATM's per year, RSP are proposing a cap of 26,468. This would be a considerable increase, more flights meaning much more of a nuisance. If London City noise compensation were to be applied to the Manston site, there would be more like 6,500 houses who would receive sound insulation. With an increase in the area for compensation due to a 57dB limit, this would almost certainly also include listed buildings, which of course would be much more difficult to sound insulate. RSP claim to be “fully funded”, but their compensation scheme is clearly aimed at keeping their costs down to a minimum and is not in the public interest.

The main aircraft type used for dedicated cargo is the Boeing 747 – 400. Many of these aircraft are over 20 years old, so are not fitted with modern quieter, more efficient engines. According to the CAA noise contours this aircraft type would result in over 40,000 people being subjected to a peak noise of over 70dB. The peak noise is of course the one we all hear, and the one that affects us the most. Large area under the flight path have in the past been subjected to frequent peak noise readings of over 90dB. This is coupled to the probability that there would be peaks in ATMs early in the morning and late at night and would be seriously disruptive to people's lives and effect health. RSP have put forward a QC count between 2300 and 0700, but at the same time claiming that there would be no planned night flights! They have I believe offered to lower the QC count, but if there are no planned night flights, I would have thought that the QC count should be zero. There should be a condition that there would be a clear ban on all night flights (except in emergencies), i.e. between 2300 and 0700 if a DCO were to be approved.

The WHO have quoted that noise above 45dB LDen is associated with adverse health effects. It has to be a basic human right that we should be protected from health hazards as much as possible – this is not what RSP are doing in their plans for the airport. Article 8 of the European Convention on Human Rights states that we have a “right to respect for our private and family life, and our home”.

Air Pollution – The Guardian newspaper recently published an article on Air Pollution (see link below) <https://www.theguardian.com/environment/2019/jun/26/action-on-air-pollution-works-but-far-more-is-needed-study-shows?>

Quotations from the article include –

“Action on air pollution works but far more is needed, study shows UK's dirty air still ‘a public health emergency’ despite dramatic fall in death rates.”

“Government action can cut air pollution, a long-term study has shown, with early deaths linked to dirty air in the UK falling by half between 1970 and 2010.”

“But toxic air remains the number one environmental health hazard, with one in 20 deaths still attributable to small particle pollution alone. The researchers said urgent action was needed to deal with a public health emergency that caused harm comparable to alcohol.”

“Even though air pollution has been falling over the years in the UK, understanding of the damage it causes to health is growing rapidly. A recent review found air pollution may be damaging every organ and virtually every cell in the human body, affecting physical, mental and reproductive health.”

“The researchers found the proportion of all deaths attributable to small particle pollution fell from 12% in 1970 to 5.2% in 2010. The deaths linked to NO₂ fell from 5.3% to 3.0% over the same period. The health impact remains at levels similar to 2010 today, with small particles and NO₂ causing an estimated 36,000 early deaths a year.”

“Prof William Collins of the University of Reading, who was not part of the research team, said the fall in pollution was a success story. However, “these past policies focused on the ‘low-hanging fruit’ and further improvements in mortality will be more challenging”.

A further article by Sandra Laville claims that *“UK accused of ignoring obligations on aviation emissions!”* (see link below). Thu 27 Jun 2019 08.00 BST

<https://www.theguardian.com/environment/2019/jun/27/uk-accused-of-ignoring-obligations-on-aviation-emissions?>

Quotations from this article include -

“NGOs say others also in breach of 1998 convention by failing to disclose details on policies.”

“Last year, aviation emitted 895m tonnes of carbon dioxide, the equivalent to 2.4% of global energy-related CO₂ emissions, according to Carbon Brief Photograph: Steve Parsons/PA Andrew Murphy of the NGO Transport and Environment said the UK and others were using these rules to avoid releasing their policies, and were therefore in breach of the Aarhus convention.”

“He said governments had failed to release their submissions to the ICAO environment committee, which meets every three and has drawn up the first scheme for international airlines to declare their emissions, known as Cors.”

“Governments have been using this UN agency’s arcane rules to dodge their obligations under international law. They are required to be transparent in how they regulate aviation emissions. Their secrecy is one of the reasons why the airline sector remains such a climate laggard.”

“The UK and other EU governments are in breach of international obligations by failing to be open about their policies to tackle emissions from aviation, a coalition of NGOs has said.”

“The group is lodging a formal complaint over the secrecy surrounding regulation of emissions from international flights, which they say allows the aviation industry to be a “climate laggard”. Last year, aviation emitted 895m tonnes of carbon dioxide – 2.4% of global energy-related CO₂ emissions, according to Carbon Brief. If aviation were a country it would be the sixth biggest emitter in the world.”

At the present time Thanet District Council have no monitors measuring PM2.5. There is therefore no baseline from which to measure an increase if the airport were to become operative again. There have been numerous previous submissions which quotes from research on the effects of air pollution produced by aircraft. Being generous, RSP have been complacent in their approach to air pollution, attempting to portray the impact as being minimal

Conclusion -I am a recently elected Green Party Councillor at Thanet District Council, representing the Thanet Villages Ward (which includes the airport site). I was voted in on a platform of clearly opposing the re-opening of Manston as a Cargo Hub airport. This I believe demonstrates that a significant number of local people do not welcome RSP's proposals as they recognise the harm it would do to the area.

I have lived close to the airport site for the last 26 years, and have closely followed a succession of failed attempts to run a profitable business on the site. The DCO has been flawed from the start and it has become increasingly obvious that the airport is unlikely to succeed in delivering a Nationally Strategic Infrastructure Programme. I therefore urge PINs and the ExA to stop the DCO before any more time, effort and money is spent on what is obviously a deeply flawed process.

Cllr Trevor Roper

Minster