

From: [REDACTED]
To: [Manston Airport](#); [Manston Airport](#)
Subject: Manston
Date: 29 June 2019 15:23:45

To whom it my concern.

I have 2 further questions to ask

a) It is my understanding that the DCO is about compulsory buying an airport 'for the good of the nation' because there is a national need for air freight. But in this article below and elsewhere, it has been demonstrated that there is NOT a national need, because there is spare capacity elsewhere. There are also other locations in the UK which would be better suited. So surely, therefore, the DCO is void?

b) If **The United Nations Convention on the Rights of the Child says that Children have a right to Health and Education. How can Exa even consider granting a DCO where RSP have clearly stated that there will be a 'significant detrimental effect' to the quality of life (and implicit in that, the Education and Health) of children?**

https://www.independent.co.uk/travel/news-and-advice/heathrow-gatwick-third-runway-davies-commission-capacity-london-flights-passengers-airlines-a8969946.html?fbclid=IwAR0e8QOUZYhe_CtzG1yQ1RHFZvUhtcP65vGreTsYf2-nqoNdPg1vBBXOcnU

HEATHROW EXPANSION: WHY NOT USE AIRPORT CAPACITY ELSEWHERE?

- [Simon Calder](#) Travel Correspondent
- [@SimonCalder](#)
- 27/6/2019

"I cannot let your comments regarding the plans for a third runway at [Heathrow](#) go unchallenged," writes Caroline Wilson from Selby in North Yorkshire. She is referring to my observation that Heathrow and [Gatwick](#) are bursting at the seams while every other UK airport has spare capacity.

"The reason everyone goes from [Heathrow](#) or Gatwick is the rest of the country has little choice. Most of the brochures sent to me advertising holidays all depart from those two airports, or Manchester. This incurs extra cost and inconvenience."

Ms Wilson points out nobody in Yorkshire, or for that matter the midlands or Scotland, actually wants to travel to London to fly. And she has an alternative. "Doncaster-Sheffield could be an excellent hub airport. They have the capacity to take any size of aircraft and the mainline railway runs next to it.

"This airport could be developed, and the high-speed rail link could be put in at a fraction of the cost of expanding Heathrow, without tunnelling the M25 under the runway.

"It is irresponsible of you to give the impression that consumers are driving this need for a third runway at Heathrow."

I agree wholeheartedly with Ms Wilson that Heathrow and Gatwick are poorly placed for anyone who lives outside the home counties. Whether you live in Cornwall, Cumbria or Caithness, there is a more convenient – and more pleasant – airport nearby.

And as the freight logistics companies know, airports outside overcrowded southeast England provide excellent access, which is why East Midlands airport has a flourishing cargo business. So why don't airlines harness the huge demand from outside London and operate more flights from regional airports?

Well, in a number of welcome cases they do. The Gulf airlines, notably Emirates and Qatar Airways, fly from airports across the UK, including Newcastle and Cardiff (though not yet Leeds Bradford), to their hubs at Dubai and Doha, with onward connections to Africa, Asia and Australasia.

But flying west, consider the prime US destination from the UK: New York. There are dozens of daily flights from Heathrow but only a handful from a few regional airports: Gatwick, Manchester, Edinburgh and Glasgow. Links from Belfast, Birmingham, Bristol and Newcastle have proved short-lived, even though each day hundreds of people from those cities fly to New York.

Two key issues for traditional airlines such as [British Airways](#) and Virgin Atlantic are connectivity and traffic mix.

Airlines like to fly from busy airports because they can carry transfer passengers from a wide range of origins. And they really like airports which reliably deliver large numbers of business-class travellers, who typically pay five or 10 times as much as those of us in economy. While it is relatively easy to fill a plane with economy travellers in summer and over Christmas/new year, at other times it is the premium passengers who bankroll the operation.

Heathrow scores higher than any other hub in Europe on those metrics, and unfortunately the average UK regional airport scores poorly. Airlines also like to concentrate their operations at large hubs: British Airways gains flexibility and reduces costs by keeping its main operations focused on Heathrow and Gatwick.

Sir Howard Davies's Airports Commission spent three years assessing the best way to meet the relentlessly rising demand for aviation, and unanimously chose a third runway at Heathrow – a decision endorsed (eventually) by the government.

In time, new aircraft such as the Airbus A321 XLR – an ultra-long-distance narrow-bodied jet – will open up more opportunities for point-to-point links. Newcastle to New York, for example, might work at last. And a proper high-speed rail network in the UK would have the dual benefits of reducing domestic flights and improving connections to the capital's airports.

Meanwhile, Heathrow – and its continental counterparts, Amsterdam, Frankfurt and Paris – will continue to grow. Relentlessly.

https://www.latimes.com/local/la-me-0529-lax-pollution-20140529-story.html?fbclid=IwAR2-w_O2qFstZ2kmyJFztp6TZe6bVy7lwe4dxLiOAdCEAkasgY1DCgwYNae

Planes' exhaust could be harming communities up to 10 miles from LAX

By [DAN WEIKEL](#) and [TONY BARBOZA](#)

MAY 29, 2014 | 5:00 AM

A plane flies overhead as Joe Mejia, 21, left; Derick Montes, 6; and Leonardo Armenia, 14, play in Lennox. A new study has found high levels of potentially harmful particles in communities up to 10 miles east of LAX. (Francine Orr / Los Angeles Times)

High levels of potentially harmful exhaust particles from jets using Los Angeles International Airport have been detected in a broad swath of densely populated communities up to 10 miles east of the runways, a [new air quality study](#) reported Thursday.

The research, believed to be the most comprehensive of its type, found that takeoffs and landings at LAX are a major source of ultrafine particles. They are being emitted over a larger area than previously thought, the study states, and in amounts about equal in magnitude to those from a large portion of the county's freeways.

It further concludes that areas affected by aircraft exhaust at major airports in the U.S. and other parts of the world might have been seriously underestimated.

Building on earlier air quality studies, environmental and preventive medicine experts from USC and the University of Washington found concentrations of the wind-driven particles over a 23-square-mile area that includes cities and unincorporated areas along LAX's flight paths, including Lennox, El Segundo, Inglewood and parts of Los Angeles.

The findings raise health concerns, researchers say, because the minute particles, which result from the condensation

of hot exhaust vapor from cars, diesel trucks and aircraft, have the potential to aggravate heart and lung conditions, including asthma and the development of blocked arteries.

Less than one-thousandth the width of a human hair, they can go deep in the lungs, make their way into the bloodstream and spread to the brain, heart and other critical organs. While emissions of slightly larger exhaust particles are regulated, ultrafines are not.

"This is a very novel and alarming set of results," said Ralph Delfino, a professor of epidemiology at UC Irvine who studies the health effects of air pollution and reviewed the study. "It's all very, very surprising."

Officials at the region's air quality agency, the South Coast Air Quality Management District, said there is little they can do to reduce pollution from airports because they do not have the power to regulate aircraft emissions. They have suggested to other agencies, including the U.S. Environmental Protection Agency, that the nation should have a standard for ultrafine particles, as exists in Europe.

Researchers found some of the highest particle levels — 6 to 8 times above normal — within a few miles of the nation's third-busiest airport. Some readings almost 10 times above normal were encountered in pockets closest to LAX. Levels up to twice the norm were detected at 10 miles out.

The affected area starts at the ends of the airport's four runways and fans out across an urban-scape that contains low-income neighborhoods and sections also affected by noisy overflights.

The extent of the pollution is so large that it challenges previous assumptions that roadways are the most significant pollution threat to urban residents. In some communities, the study states, many people may be exposed to a greater amount of particle pollution living downwind from LAX than from residing near highways.

Researchers calculated that it would take between 174 and 491 miles of freeway traffic — or about 20% to 50% of the highways in Los Angeles County — to generate levels of pollution equivalent to those detected east of LAX.

"We rightly spend a lot of time worrying about schools and homes that are close to freeways, but here's a huge source of ultrafine particles that we've apparently missed," said Scott Fruin, a professor of preventive medicine at USC's Keck School of Medicine who led the research.

The bulk of the study was conducted last year, when scientists spent weeks taking measurements from two vehicles filled with air quality monitoring devices. They drove north-south routes through residential streets and major thoroughfares, measuring pollution concentrations at increasing distances from the airport.

"We kept looking for the end of the impact and never really found it," Fruin said. "We never reached a point far enough downwind that we didn't measure" particles from LAX.

Residents of cities along the heavily traveled flight paths said the new study validates their long-standing complaints that LAX is a significant source of air pollution in their neighborhoods, where jet exhaust has covered their homes, cars and outdoor furniture with soot.

"This confirms what we have been saying all along," said Diane Sambrano, a community activist who lives in Inglewood. "We've been called every name in the book for complaining. Yet we know what we are talking about."

The study's conclusions are consistent with earlier work that found elevated levels of ultrafine particles near LAX and Santa Monica Airport, a general aviation facility. The latest research, however, recorded significant concentrations of the pollutant at much greater distances from LAX.

In addition to ultrafine particles, researchers detected similarly high levels of other emissions, including smog-forming gases called nitrogen oxides and black carbon, a major component of soot found in engine exhaust.

"My biggest concern is for people in and near the airport," said Denny Schneider of Westchester, president of the Alliance for a Regional Solution to Airport Congestion. "We have identified something that is not just a boogeyman, but a real issue. Now we have to find out how to stop it."

Philip Fine, the air district's assistant deputy executive officer, called the study's findings "novel and compelling" and said they make a strong case for addressing the emissions.

"It will perhaps push toward further controls, hopefully, and further regulation," he said.

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<https://www.nidirect.gov.uk/articles/childrens-human-rights>

Children's human rights

The United Nations Convention on the Rights of the Child (UNCRC) is an internationally binding human rights agreement. The convention has 54 articles. 42 of the articles set out the rights of children and young people. The rest are about how governments must publicise and carry out the convention.

Rights given under the convention

Children and young people up to 18 years old have all the rights under the convention. Children and young people have social, economic, cultural, civil and political rights.

A convention is an agreement between countries to obey the same law. When the government of a country ratifies a convention, that means it agrees to obey the rules set out in that convention.

What the treaty means

When the treaty came into force, every child in the UK has been entitled to over 40 specific rights. The different rights are not ranked in order of importance; instead they interact with one another to form dynamic parts of an integrated unit.

- the right to life, survival and development These include:
- the right to have their views respected and to have their best interests considered at all times
- the right to a name and nationality, freedom of expression and access to information about them
- the right to live in a family environment or alternative care and to have contact with both parents if possible
- health and welfare rights - including rights for children with disabilities - the right to health and health care and social security
- the right to education, leisure, culture and the arts
- special protection for refugee children, children in the juvenile justice system, children deprived of their liberty and children suffering economic, sexual or other forms of exploitation

The rights in the convention apply to all children and young people, with no exceptions.

<https://www.clydebankpost.co.uk/news/17731012.msp-gil-paterson-secures-parliament-debate-on-aircraft-noise/?fbclid=IwAR3bMX7lm9pmHEKKOQ2MhXjwHKOU8pANMfWkQ4rM5TSsOfHOgsTkXL2cC4I>

26th June

MSP Gil Paterson secures parliament debate on aircraft noise

By Lauren Brownlie

The MSP also announced that a proposal will go before West Dunbartonshire Council in August to approve a pilot scheme retrofitting 12 houses for heat and sound protection.

He also spoke of the importance that when new houses are built under the flightpath, they comply with the World Health Organisation (WHO) recommendations.

He said: "The WHO say that people are damaged at levels over 45 decibels. Therefore, I believe that housing regulations for new build homes which are within this zone be required to install materials that protect to the 45 decibels level.

"The cost of installing on a virgin housing site is considerably less than having to rip out and reinstall."

"Right now in Clydebank there are houses being built that fall within the 60 decibels zone, which if not fitted with a dual heat/sound protection products at the start would be required to do so in a few short years.

“However, I am very glad to say West Dunbartonshire Council have been very engaged and alert in this matter and there is every chance these houses will be fully protected.”

UK accused of ignoring obligations on aviation emissions

https://www.theguardian.com/environment/2019/jun/27/uk-accused-of-ignoring-obligations-on-aviation-emissions?CMP=Share_AndroidApp_Facebook&fbclid=IwAR0AAQfQMDg11Msj5iGBP4sNg2fwxnSy25XSmXZw4KyY_CNxivR0ldAI3c

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

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.

But the UK and other EU governments are in breach of international obligations relating to the release of environmental information because they are failing to disclose details on cutting emissions, say the NGOs which are part of the International Coalition for Sustainable Aviation. The [Aarhus convention](#), which was agreed in 1998, enshrines the right for everyone to receive environmental information held by public authorities.

The parties to the convention are required to make the necessary provisions so that public authorities contribute to these rights to make them effective.

The coalition of NGOs will raise its complaints on Thursday [at a meeting of the working group of members of the convention in Geneva](#).

The UK, EU and European governments are all members of the International Civil Aviation Organization, a UN body in charge of reducing the carbon footprint of international aviation. But the ICAO has been criticised for its secrecy. Its agenda and discussion documents are not released to the public or the media, and the meetings are held behind closed doors.

Documents do emerge through leaks, but the ICAO rules warn participants that [they face “unlimited liability for confidentiality breaches”](#).

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 [Corsia](#).

Murphy said: “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.”

Under Corsia, international aircraft will this year have to start monitoring their emissions as part of ICAO measures. Central to these measures is a market-based system of purchasing emissions offsets rather than a requirement to directly reduce aircraft emissions.

[Air transport](#) companies can reduce the amount of carbon emissions they have to offset by using biofuels. A final decision on the rules around what kinds of biofuels can be used was made last week at an ICAO meeting, but the policy has not been published.

The Guardian asked the ICAO to release details of the policy, but the agency was not able to provide the information in time for publication.

Corsia was agreed in 2016 by the 36 ICAO member countries and has taken until this year to implement. But some believe it will not have the required impact on reducing emissions produced by an aviation industry which predicts passenger numbers doubling to 8.2 billion by 2037.

A spokesperson for the Department for Transport – which sends officials to ICAO meetings – said the UK did not publish official correspondence with the UN body because it is was “not an environmental organisation” and that its work involved confidential information which was commercially sensitive.

“We strive for maximum transparency and recognise the importance of public access to information, which is why we are seeking to improve ICAO practices in this area,” the DfT said. “We are engaging with the ICAO and all its other member states, and will continue working to ensure our international environmental responsibilities are upheld.”

<https://www.latimes.com/local/lanow/la-me-ln-flight-path-lax-faa-city-lawsuit-sue-noise-planes-20190624->

L.A. is suing the FAA as residents are fed up with noisy planes in their neighborhoods

By **DAKOTA SMITH**

JUN 24, 2019 | 6:45 PM

Citing concerns about airplane noise for residents in West Adams, Mid-City and surrounding neighborhoods, the city of L.A. is suing the Federal Aviation Administration to get a court to invalidate the routes jets now use to access Los Angeles International Airport.

The lawsuit follows complaints from residents in those neighborhoods who say planes are bearing down on their homes, causing a thunderous and constant commotion.

The city's three-page petition challenges the FAA's May 2018 publication and subsequent implementation of its "North Downwind" approach procedures to LAX.

The city pushing back on what it describes as a new policy to limit public comment on flight paths. Comments submitted to the FAA's website on the proposed flight procedures now aren't taken into account, the city claims. City Atty. Mike Feuer's office said in a statement on Monday that the FAA changed flight patterns in 2017. Further changes were made in May 2018, but the agency "allegedly failed to perform the required environmental review or seek public comment," the statement said.

The FAA's new flight pathways are part of the Southern California Metroplex project, which created satellite-based routes at airports throughout the region. The routes, according to the agency, are supposed to be more precise than previous pathways, which use ground-based navigation.

In 2016, the agency declared the Southern California Metroplex "would not result in significant noise impacts or reportable noise increases."

The city said in its statement that its lawyers will argue that the FAA failed to properly consider the environmental impacts of changing the flight paths. The city wants the court to deem the paths invalid and force the agency to do a proper environmental review.

Ian Gregor, a spokesman for the FAA in Los Angeles, said the agency does not comment on pending litigation. The city's petition was filed Friday with the U.S. 9th Circuit Court of Appeals, which handles cases against federal agencies.

Previously, the city sought to work with the FAA to address several complaints about the flights, but "to date these negotiations have been unsuccessful," the city's said in its statement.

The Southern California Metroplex project is part of a larger FAA modernization program called NextGen, which has drawn complaints in several cities. Newport Beach and Culver City have also filed legal challenges against the FAA.

"Too many people are being impacted by all the new flight paths," said Denny Schneider, chairman of the LAX Community Noise Roundtable, who hadn't seen the lawsuit yet. "Let's hope that the FAA is listening."

The roundtable consists of an array of members, including community groups and elected officials.

Separately, the Burbank-Glendale-Pasadena Airport Authority voted last week to ask the FAA to use different flight paths for departures out of Hollywood Burbank Airport. The authority is seeking to bring relief to residents in Studio City and other San Fernando Valley communities who've been complaining about aircraft noise.

Times staff writer Emily Alpert Reyes contributed to this report.