

From: [REDACTED]
To: [Manston Airport](#)
Subject: Comments on Applicant's Responses to Fourth Written Questions
Date: 06 July 2019 12:00:36

From: Chris Lowe. Interested party: 20014275

Dear Sirs,

I am pleased to provide my comments below on some more of the Applicant's answers to your Fourth set of Questions.

I apologise that I was not able to send this out last night (5 July) and hope that this can be accepted as Evidence.

Thank you.

G.4 General and Cross-topic questions (including local policy)

G.4.1

Climate change

The Applicant has assessed that there is a market for dedicated freight for perishables like food. DEFRA has determined that air freighting of food has the highest CO2 emissions per tonne [REP4-036].

i. How has the Applicant factored this into its assessment?

MY COMMENT ON APPLICANT'S Answer:

RiverOak Strategic Partners (RSP) try to avoid the implications of the DEFRA report, but it is relevant because other transport modes would reduce emissions associated with that food, and thus help the UK, and the world to reduce its emissions.

Likewise if the proposed Manston facilities were not available this would increase the recipients' incentive to find a more local source of equivalent food, dramatically reducing emissions.

So it should be a factor to consider at this Examination, and their concluding sentence: "it is not appropriate to draw any relationship between the Proposed Development and the statistics presented in the Defra report" is clearly wrong, as the DEFRA report is an additional reason not to allow the Manston proposals.

RSP quote that the Environmental Statement (ES) concludes that the Co2 emissions from the proposed development represent 1.9% of the total UK aviation emissions target.

The Total Air Transport Movements in 2018 were 2,269,000 (table 4.2, Trans_Move_by_Type_2018) so Manston's potential 20,000 ATMs represent less than 1% of UKs ATMs.

This means that Manston's emissions are both a significant and a disproportionate increase in the UK's aviation emissions at a time when the UK is unsuccessfully struggling to reduce aviation emissions.

RSP note that the CMAP tries to address their own, on-site emissions, but that is a small proportion of the total.

ii. Has the Applicant identified and assessed the worst case environmental factors in relation to:

- energy consumption for each of its large temperature-controlled storage facilities;
- energy consumption for warehouses;
- energy consumption for night time use of aviation facilities; and

• sole dependency on road surface access by HGVs, fuel tankers, passengers and workers for the airport?

iii. What is the current status of the Applicant's Climate Change Adaptation Strategy?

iv. How has the Strategy been updated in the light of the Government's commitment to 'net zero' emissions by 2050?

MY COMMENT ON APPLICANT'S Answer:

Again RSP seek to avoid answering the question, and do not offer any suggestion of further reducing emissions from the proposal. They obviously take no notice of the UK Parliament declaring an Environment and Climate Emergency (www.bbc.co.uk/news/uk-politics-48126677) which supports stronger action to reduce emissions.

The Climate Change Act (2008) may still exclude international aviation but the Committee on Climate Change Net Zero report does include it and the Committee are writing this month to the Secretary of State for Transport this month (July) to provide specific transport advice. As this will come out during your deliberations, and I have drawn your attention to it, you can accept it as valid evidence, even if you only refer to it as something that the SoS should consider before making the decision on the Application.

G.4.3 ICCAN Corporate Strategy 2019-2021 Consultation

Page 5 of the above Strategy states that:

“Disturbance from aviation noise is an inherently personal experience. We know from our early engagement that the effects can be deeply disturbing and have a detrimental effect on people's quality of life and health. How much – and in what way – an individual is affected by aviation noise cannot be explained or described by any graphs, metrics, maps or other data. Nor can the bigger-picture benefits to the economy realistically be expected to compensate those who suffer from aviation noise3.”

What is the Applicant's view?

MY COMMENT ON APPLICANT'S Answer:

RSP again seek to avoid responsibility by saying: “The extract from ICCAN set out above does not relate to the Manston project. ICCAN representatives attended the first Noise hearing in March 2019 and raised no objections to the project.”

The ICCAN representative was obviously not able to bring a view to the Examination because this was their first contact with the Examination and they were still in the early days of being set up, so ICCAN was in no position at that time to raise an objection.

However the view given in the ICCAN Corporate Strategy is relevant to Manston because it relates to the widespread discussions that they have had with a wider range of industry and public bodies, including hearing the ISH on Noise.

I find it extraordinary that RSP can say: “whether benefits of this nationally significant infrastructure project outweigh the limited harm to a very small percentage of the population.”, when you have clearly heard and read very real concerns about the severe impacts of noise on a large population, many of whom already suffer other handicaps.

So it is not a “limited harm” especially when that harm coincides with other detriments such as more air pollution increased climate heating etc.

Likewise it may be an NSIP, but the so-called benefits are provided to relatively few people because those benefits are already available by other means or routes, and the potentially biggest benefits would come to RSP itself, rather than to any of the existing populace.

RSP have obviously spent a lot of money, and are promising even more to create this airport, so RSP expect an income to outweigh these costs, but that income will go to them, not the public at large who would have to suffer all the disturbance of creating the airport and its operations.

I hope this is helpful to you,

best wishes,

Chris

Chris Lowe