

From: [REDACTED]
To: [manstonairport](#)
Cc: [Richard Price](#)
Subject: Manston DCO Deadline 12
Date: 09 July 2019 15:33:51
Attachments: [1562680487836001_1739720676.png](#)

STATEMENT OF CONCERN

Dear Planning Inspectorate,

Respectfully, I am a resident of Ramsgate town and wish to highlight the following points which show the future of the Manston site as a cargo hub is not in the interests of either the local residents or the UK as a whole. I draw attention to the nationwide facilities available/being built, and questions over the RSP submission by the Applicant. I hope you are able to consider all my points below which cover UK aviation trends and I believe are pertinent to the project validity.

1. RSP quota for night time flights - their submission cites a loophole to evade the figures they quoted:

re: Applicant's Answers to Fourth Written Questions dated 29/06/19

(TR020002/D9/FWQ Examination Document)

At Ns 4.10, under the heading *Quota Count Night Time*, the Applicant says:

*"The applicant is therefore willing to reduce the quota count to 2000 (365*5 being 1825), but this would be on the basis that late-arriving, emergency and humanitarian flights would be excluded from that total. If they are to be included as at present, then the Applicant would wish to keep the original figure of 3028."*

RSP are bartering total number of flights in a way to get the original figure of 3028 flights which is an enormous number. There would be nothing to stop the Applicant from allowing "late" arrivals to land at any time, at any noise level, between 2300 and 0600. This has never been consulted on, nor has it been modelled by the Applicant and presented for examination to the Examining Authority.

This has the potential to be extremely damaging to residents' health, well-being and the local economy. It is completely and utterly unacceptable.

I therefore wish object to the Examining Authority allowing the Applicant's suggestion at Ns.4.10 to remain in the Noise Mitigation Plan for the Manston Airport DCO.

The Applicant has consistently said to the public that it does not need night flights and that there will be no night flights. Let us hold the Applicant to that in the clearest possible terms in the Noise Mitigation Plan and in the draft DCO: no flights, scheduled, chartered, or otherwise labelled, late or on time, between 2300 and 0700.

2. Demand for air freight in/out of the UK is falling & existing airport facilities are adequate, making an additional cargo hub in the South East nonsensical:

(From Department of Transport - UK Aviation Forecasts October 2017:

2.56... At the airport level the number of freighter movements has been volatile with some evidence of overall national decline in recent decades.

4.6 The top five airports for the tonnage of cargo carried in freight aircraft and for freight carried bellyhold in passenger aircraft have changed relatively little from 2011 to 2016. Cargo carried on freighter aircraft is dominated by East Midlands and Stansted which consolidated their positions together carrying 56% of cargo tonnage in 2011 and 63% in 2016.

4.7 Heathrow remains much the most significant airport in terms of freight tonnage carried on passenger aircraft with around 85% of the UK total in 2016. Much of this freight is carried on long-haul aircraft, and reflect Heathrow's strength in that market.

4.8 Figure 4.6 illustrates the top five airports for freight by tonnage for the two types of freight carriage. In both cases it is clear that freight continues to concentrate at a few airports where there are extensive freight handling facilities.



From p18 (from 'Air Freight: The facts' Researched and written by Rose Bridger /Published by AirportWatch October 2009):

"PLANS TO DOUBLE CARGO BY 2015, TRIPLE BY 2030 In the face of the economic downturn, with freight volumes plummeting, airports throughout the UK have not reconsidered or scaled down freight expansion plans. The 'paradox of aviation' noted by Airport Watch and Aviation Environment Federation, with expansion plans in the face of declining passenger numbers, also applies to freight with growth plans published and infrastructure development underway as volumes contract."

3. Expansion of 3rd runway at Heathrow & new government target reducing co2 emissions by 2050 should reduce other airport expansion:

This article by expert advisor in Jun 2019 highlights the relationship between the expansion at Heathrow and the corresponding lack of expansion at other regional airports:

<https://news.sky.com/story/heathrows-third-runway-may-prevent-other-airports-from-expanding-adviser-warns-11748312>

"John Gummer (Lord Deben), chair of the committee on climate change (CCC), told Sky News that Heathrow's expansion would use up the majority of the envelope the aviation industry would have between now and 2050, implying that other expansions should not be permitted if Britain is to hit its climate targets."

The intervention comes only weeks after the government pledged to reduce its greenhouse gas emissions to zero in net terms by 2050.

He added: "If Heathrow is built it has to be built within the envelope of emissions which we have allowed for aviation. It has knock-on effects. It means you can't build similar things elsewhere in the country.

The warning is significant, since the government has historically followed the recommendations laid down by the CCC, its official adviser on climate change.

...the CCC said that in its report it had adjusted for anticipated improvements in technologies, and that its advice stood."

4. Air freight planes are particularly noisy, polluting and dangerous; no need necessarily for night flights due to nature of air freight cargo:

(from 'Air Freight: The facts' Researched and written by Rose Bridger /Published by AirportWatch October 2009)

From the intro:

It can use older, noisier planes. It often comes in at night. Yet less than 20% of express freight is time-critical. This would suggest that, given the political will, the amount of freight delivered at night could be significantly reduced, bringing blessed relief to many communities.

John Stewart Chair AirportWatch

From p25:

LOCALISED ENVIRONMENTAL IMPACTS Along with aviation's contribution to the long term, global environmental problem of climate change, there are localised, short-term environmental impacts which are worst for communities living near airports. Localised ground level pollution from airports along with the land transportation from road and rail networks converging at multimodal hubs brings a cocktail pollutants including nitrogen oxide, sulphur dioxide which irritates the lungs and is associated with bronchitis, carbon monoxide, ground level ozone which impairs lung function and aggravates chronic lung diseases and VOCs (Volatile Organic Compounds) unburned hydrocarbons, benzene and formaldehyde.

Air freight leads to particular noise problems as older, less efficient noisier passenger planes are often converted to freighters. There is relentless pressure for more night flights, already unrestricted at East Midlands, with plans to increase at airports including Robin Hood.

5. Expected central government subsidies for supporting infrastructure/roads to cope with extra traffic etc

With so many flights expected by RSP their estimates for impact to relating road networks seems woefully inadequate to me. I believe there needs to be further questions as to the arterial roads into and around London to fully understand the impact of such a project in Thanet; this would in the end require a significant input of monies from central and local government and would not be funded by RSP therefore the projected cost of such a project should take on this. I believe government departments on tight budgets would want to understand what possible projected costs could be in the outcome of the maximum number of flights to and from this site. I do not believe RSP will cover all such costs and will fall on DoT to foot the bill. I do not believe this has been adequately considered at all, although I do understand the role of PINS is not to engage in carrying out such surveys I feel it is pertinent to point out as impact on the DoT. Some of the submissions from the Applicant cite 'insignificant impact' but with around 3000 flights per annum I find this an astonishingly naïve assumption that should be rigorously questioned.

yours respectfully,
N Francina Van Twest

