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**From:** TRANSPORTINFRASTRUCTURE  
**Sent:** 06 January 2020 15:12  
**To:** Rob Pridham  
**Subject:** FW: NSIP: TR2020002 Proposed Manston Airport

Rob,

This came into the inbox today.

Shenaz

**Ms Shenaz Choudhary | Planning Casework Officer, Transport Infrastructure Planning Unit, Department for Transport  
1/14 | [REDACTED]  
Post to: Great Minster Hse, 33 Horseferry Rd, London, SW1P 4DR**

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[REDACTED]

**Sent:** 06 January 2020 10:10  
**To:** TRANSPORTINFRASTRUCTURE <TRANSPORTINFRASTRUCTURE@dft.gov.uk>  
**Subject:** NSIP: TR2020002 Proposed Manston Airport

The Rt. Hon. Grant Shapps,

The Secretary of State for Transport,

Department for Transport,

Zone 1/18, Great Minster House,

33 Horseferry Road,

London SW1P 4DR

6<sup>th</sup> January 2020

**NSIP: TR2020002 Proposed Manston Airport**

**From: Chris Lowe. Interested party: 20014275**

Dear Secretary of State,

I understand that you will be announcing your decision on the proposed Manston airport in due course.

I therefore ask that you will consider the following further new evidence which has been published recently after the closure of the Examination, adding to the evidence that this proposal is totally unacceptable.

## 1 Airports are a major source of Ultrafine particles (UFP)

The report previously referred to by CPRE Kent (CO2 emissions from commercial aviation, 2018, Brandon Graver, Ph.D., Kevin Zhang, Dan Rutherford, Ph.D., September 2019 [www.indiaenvironmentportal.org.in/files/file/ICCT\\_CO2-commercl-aviation-2018.pdf](http://www.indiaenvironmentportal.org.in/files/file/ICCT_CO2-commercl-aviation-2018.pdf)) showed that aviation emissions have been under-estimated.

Now new evidence (“Source apportionment of particle number size distribution in urban background and traffic stations in four European cities”, [www.sciencedirect.com/science/article/pii/S016041201931832X](http://www.sciencedirect.com/science/article/pii/S016041201931832X)) from researchers at King’s College London have measured ultrafine particles (UFP) in European cities and detected emissions from airports. Many studies have examined and quantified the levels of larger particles (e.g. PM2.5 – <2.5µm or PM10 – <10µm), but very few have studied UFP (< 0.1 µm). The researchers identified, characterised and quantified the sources UFPs in Barcelona, Helsinki, London, and Zurich between 2007 and 2017. They measured particle and gaseous pollutants at different sites and used a statistical model to identify and quantify the contribution of the different sources of ultrafine particles. They found that London had the highest concentration of UFP compared to other cities. The greatest concentrations of the smallest particles (called nucleation particles) occurred when the wind was blowing from the airport in all cities. This indicates that airports are a major UFP source and that these small particles can travel many kilometres.

So this confirms that airport pollution – with very negative health impacts – spreads out from the source airport.

The researchers also state that: *“Airport emissions contributed to nucleation particles in urban background areas.”*

So this study is very important because it is the first study to definitely state that airports are a major source of UFPs, which are harmful to health. And of course UFPs are more concentrated in a downwind arc from the airport which is clearly shown by the high (red) concentrations in the maps. Whilst the study finds that road traffic emissions contributed the most, it is axiomatic that as an airport expands, so will the local traffic as a consequence. These two sources of health harms are a cumulative adverse environmental impact from airports.

This research confirms research published by the US Mobile Observations of Ultrafine Particles (MOV-UP), (<https://deohs.washington.edu/mov-up>) which found that communities underneath and downwind of jets landing at Sea-Tac Airport are exposed to a type of ultrafine particle pollution that is distinctly associated with aircraft. The study is the first to identify the unique "signature" of aircraft emissions in Washington.

In the case of the proposed Manston Airport, the wind is from the west most of the time, around 70% over a year, and therefore the urban areas of Thanet would be very badly affected.

## 2 Air pollution and Noise affect Birth outcomes

New research, “Impacts of air pollution and noise on risk of preterm birth and stillbirth in London” published in *Environment International*, Volume 134, January 2020, 105290, ([www.sciencedirect.com/science/article/pii/S0160412019314734](http://www.sciencedirect.com/science/article/pii/S0160412019314734)), is the first study of long-term road traffic noise in relation to stillbirth, and the largest study to date of air and noise pollution in relation to birth outcomes. It shows that ambient ozone linked to increased risk of preterm birth and stillbirth, and that traffic non-exhaust PM<sub>2.5</sub>, is linked to increased risk of preterm birth and stillbirth, also that traffic noise is linked to risk of preterm birth.

Hence this is additional evidence against allowing increased noise and air pollution from the proposed airport and its associated road traffic.

### **3 Independent Commissioner for Civil Aviation Noise (ICCAN)**

As you are no doubt aware, the Independent Commissioner for Civil Aviation Noise (ICCAN), has just published "Review of the Survey of Noise Attitudes 2014 " and this highlights important issues for the proposed Manston Airport.

ICCAN highlight issues with current assumptions about "acceptable" aircraft noise levels, and as well as concerns about actual values of the LOAEL. It also emphasises concerns about the impact of changes in noise levels caused by changes in aircraft activities.

On Page 11 of the Review, for example, it states: "a community who experiences an increase in aviation noise will report higher levels of high annoyance than a community who have lived at the higher exposure level for a long period of time. In fact, it has been found that even an announcement of a change can affect community sensitivity towards noise<sup>18</sup>."

Furthermore, regarding your Department's impact assessment Tool, WebTag, ICCAN notes that: "As yet, WebTAG and WebTAG+ are not able to account for the change effect (see Issue 3 above). For example, if a community experiences a change that increases its exposure to aviation noise, WebTAG and WebTAG+ can anticipate the associated health costs and/or benefits by applying the health impacts of communities already under that level of exposure. However, it does not calculate the additional impacts that are associated with the change represented by an increase in exposure."

Hence use of the current WebTag tool would greatly underestimate the impacts of the proposals.

The latter is particularly relevant to the proposals because the proposed Manston Airport Site site has not had an airport for more than five years, so that everyone has become used to the lack of aircraft noise.

Hence the proposed 10,000 Air Transport Movements by heavy and noisy freight aircraft would be very intrusive.

All of the evidence therefore shows that the Applicant's proposals, for a new, very polluting and noisy, airport, are totally unacceptable for the Isle of Thanet.

I would be pleased to clarify any queries on this response or to enlarge any aspect.

Yours faithfully,

Chris Lowe



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