

**From:** [REDACTED]  
**To:** [Manston Airport](#)  
**Subject:** REF 20014355 HRDF COMMENTS SoS LETTER 17/1/2020  
**Date:** 25 January 2020 11:42:10

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It is clear from DIA submissions to the DCO that the move of this facility is very difficult, and any failure of operation potentially life threatening.

From a risk management viewpoint it requires the strongest risk control measures to ensure continuous operation.

That will involve multiple levels of redundancy in the operating systems, and can only be delivered by dual and standby operation at the current and new sites. To make this explicit and as there is no room for theories, promises and hope with this project I suggest the draft DCO include the following:

" .... which at the MoD's discretion may include dual and standby operation for any period specified."

That would ensure the move of this critically important facility is not fudged.

Gareth Inko

**From:** [REDACTED]  
**To:** [Manston Airport](#)  
**Subject:** COMMENTS ON CHRIS LOWE'S SUBMISSION 6/1/20  
**Date:** 27 January 2020 14:44:56

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As I understand it, Ultra Fine Particles are very invasive getting deep into the lungs and being able to cross the blood/brain barrier. Because of that the precautionary principle needs to be adopted when considering their spread.

If the wind blows from the east, Herne Bay would be affected, as well as Thanet. There is also the question of how does this research impact the Manston Green development. What would be the exposure for residents living there?

Of course, the more successful the Airport, the more UFPs created and the greater the problem. there is also the question of how does this tie in with the concept of the polluter pays? At the moment the applicant would maximise profits while getting taxpayers and the local community to pay the costs. Is this fair?

UFPs are yet another negative externality, which have not been given a financial cost, which would result from this DCO being granted.

Gareth Inko

**From:** [REDACTED]  
**To:** [Manston Airport](#)  
**Subject:** COMMENTS ON SoS LETTER 17/1/20 - NEW REQUIREMENT 21(4) RESTRICTIONS ON TAKE OFFS AND LANDINGS  
**Date:** 29 January 2020 11:24:10

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I fully support and endorse this concept, because it tackles the problem of road traffic trip generation by the airport's operation at source. However, whilst it might be applicable for the existing traffic conditions and estimated airport trip generation (HGV & cars), it will need to be flexible to cope with changing circumstances. I therefore suggest the following is added to requirement 21(4):

" Amended or further restrictions and prohibitions on take offs and landings may be imposed at the discretion of the highway authority to control local traffic congestion or pollution. Planning permission for the continued operation of the airport will be conditional on adherence to any amended or new restrictions or prohibitions on take offs and landings."

This will ensure the concept of the polluter pays is adhered to and in part, stops the applicant privatising profits whilst socialising costs.

Gareth Inko

**From:** [REDACTED]  
**To:** [Manston Airport](#)  
**Subject:** SOS LETTER 17/1/20 COMMENTS ON FIVETENTWELVE LTD SUBMISSIONS  
**Date:** 31 January 2020 11:33:31

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Ref: 20014355

I mostly support and endorse the comments by Fivetentwelve Ltd in their submissions.

I wish to make the following specific comments:

#### CLIMATE CHANGE & REGIONAL POLICY

To allow the DCO will not only potentially decrease aviation related business outside London and the South East (LASER), but could also slow its growth. This is contrary to Government policy to level up the regions outside LASER.

I agree, 2050 green paper says existing airports in LASER should be expanded, Manston is not an existing airport: it has no CAA licence and the existing infrastructure does not support flight operations. Also, the NSIP justification of the applicant emphatically maintains its capacity is zero.

The Government has declared a climate change emergency, mitigating aviation emissions from a reopened Manston Airport will not be enough (see [www.unenvironment.org/news-and-stories/story/carbon-offsets-are-not-our-get-out-jail-free-card](http://www.unenvironment.org/news-and-stories/story/carbon-offsets-are-not-our-get-out-jail-free-card) ) mitigation needs to give way to prevent or control by 2030. That is the world view for the UK see [www.aef.org.uk/2019/10/09/no-room-for-offsetting-says-aef-in-response-to-government-consultation-on-carbon-offsetting-in-transport/](http://www.aef.org.uk/2019/10/09/no-room-for-offsetting-says-aef-in-response-to-government-consultation-on-carbon-offsetting-in-transport/) for UK view why mitigation is only short term.

In its 20 year plan how will the applicant reduce their emissions of green house gases?

The applicant's plans envisage the switch of freight from lorries coming from European airports to planes flying directly to Manston. Lorries can be decarbonised by hydrogen, battery, biogas or electric operation much easier than freight aircraft. So allowing the DCO would make it harder for the UK to become zero net CO2 emitter by 2050.

The Government must have a notional limit on aviation green house gas emissions. If the DCO is allowed that allowance will be used up in LASER. DCOs airport expansions this year are likely for Heathrow, Gatwick and Luton. This stops future growth outside LASER, as the CO2 allowance will have been used by LASER. That stops aviation being used to level up the regions. Simply, if the DCO is granted it will not be environmentally sustainable to allow aviation to expand outside LASER.

Gareth Inko