



31st January 2020

Ref: 20014343

The Manston Airport Case Team
National Infrastructure Planning
The Planning Inspectorate
Kite Wing, Temple Quay House
Temple Quay, Bristol BS1 6PN

Dear Manston Case Team

Thank you for the opportunity to submit further information for the attention of the Secretary of State in this matter.

We fully endorse the late submissions that you have received from Five10Twelve Ltd regarding Riveroak Strategic Partners' application for a Development Consent Order, and would refer you to these, our own and others' previous submissions on matters including:

1. Negative environmental impacts (direct; indirect via major increases in road traffic)
2. Negative public health impacts (in an area where health is extremely poor)
3. Negative educational impacts (in an area where educational outcomes are low)
4. Negative impact on the local economy (specifically tourism, our one growth sector)
5. Negative impact on our many historic buildings and sites (in a Heritage Action Zone)
6. Uncertainties and inconsistencies in the proposal
7. Limited likelihood of success (on a promontory surrounded on 3 sides by sea)
8. Concerns regarding the financial status, experience and intentions of the proposers
9. Flaws in the consultation process
10. Failure to demonstrate need for a National Infrastructure Project

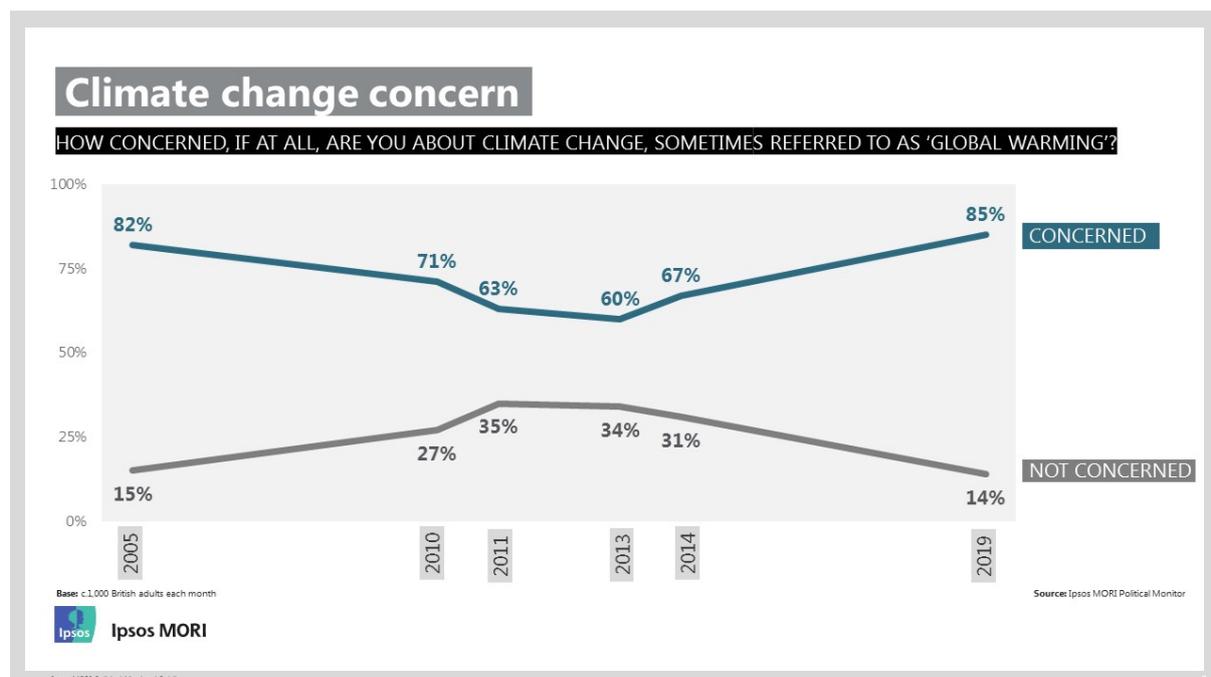
We are responding now specifically to your request for further information in respect of the **implications of the proposal for climate change.**

The Climate Change Act (2008) requires the Government to take steps to reduce emissions of carbon dioxide and other greenhouse gases to avoid a disastrous increase in global temperatures. It creates a legally binding commitment for the UK to reach net zero carbon emissions by 2050. The Act also requires the Government to set out a framework to reach this target, setting staged carbon budgets to allow us to reach net zero in properly planned-for steps.

Last year's Conservative Manifesto, on which the current Government was elected, went further, committing the UK to becoming an international leader in combating climate change, in advance of the international summit to be hosted by the UK in Glasgow in November. The Government's Environment Bill is due to come before Parliament next week and is intended to highlight the Government's commitment to addressing the issue.

It is thus particularly important at this point for the Government both to act decisively and to be seen to be responding clearly and consistently. The recent revelation that fossil fuels accounted for 90% of the £2bn deals made at the UK-Africa summit has unfortunately not enhanced the Government's reputation for serious commitment to tackling the problem.

Climate change is now a major factor in UK public opinion: in August last year, for example, an Ipsos MORI poll found what it called 'record levels' of concern, with 85% of Britons saying they were concerned about climate change and 52% describing themselves as 'very concerned'. Significantly, nearly three-quarters of respondents (73%) believed Britain is already feeling the effects of climate change, and the majority (55%) suggested the Government should be working to reach net zero carbon earlier than 2050.



(Source: Ipsos MORI, 12th August 2019: <https://www.ipsos.com/ipsos-mori/en-uk/concern-about-climate-change-reaches-record-levels-half-now-very-concerned>)

Aviation accounts for 2.4% of global emissions, but this is heavily weighted towards the West. The US Environmental and Energy Study Institute commented in October 2019: "While (2.4%) may seem like a relatively small amount, consider that if global commercial aviation were a country in the national CO2 emissions standings, the industry would rank number six in the world between Japan and Germany. Non-CO2 ... bring the combined **total contribution of commercial aviation to approximately 5 percent of the world's climate-warming problem.**" In the UK, aviation is estimated to account for between 6 and 7.5% of

emissions at present, but this is forecast to rise dramatically to 25% by 2050. (Source: Aviation Environment Federation website at <https://www.aef.org.uk/issues/climate>)

Some 70% of aviation emissions are carbon dioxide, which is particularly dangerous as at least 20% of it can persist in the atmosphere for more than a thousand years. Moreover, non-CO₂ factors magnify the effect: for example, contrails of water vapour and ice crystals from aviation form cirrus clouds which trap infrared rays, contributing to a warming effect up to 3 times that of CO₂, while nitrous oxides create further damaging effects. In total, the Committee on Climate Change estimates that the non-CO₂ effects of aviation roughly double the effects of CO₂. (Source: Committee on Climate Change, 2019: Net Zero Technical Report (<https://www.theccc.org.uk/publication/net-zero-technical-report>))

Research is of course being undertaken to reduce aircraft emissions, but its effect is limited. Improvements to reduce exhaust emissions in the domestic motor trade reach consumers quickly, but in the case of aviation, the investments companies are making in their fleets are so great that new purchases are infrequent, and thus the technology in daily use changes very slowly. The Aviation Environment Federation comments: *“Technology improvements in aircraft efficiency have been unable to keep pace with growth in the overall level of flying. While historic technology improvements look impressive, official UK forecasts predict annual fleet efficiency improvements of less than one percent between now and 2050.”* (Source: Aviation Environment Federation as above.) They conclude bleakly: *“There are few commercially scalable options for ‘decarbonising’ aircraft in the near future.”* (ibid)

This is a particular problem for the cargo sector, where older planes tend to end up. (See, for example, discussions on the Stack Exchange online network Aviation pages at <https://aviation.stackexchange.com/questions/35779/why-do-aircraft-models-end-their-life-as-freighters> – eg: *“There seems to be a tendency that aircraft models are more long-lived for cargo than for passenger service... (For cargo) capacity utilisation is worse. This shifts the balance of cost such that fixed cost must be lower than what is possible with scheduled services. As a consequence, older aircraft with lower depreciation cost are preferred... Cargo operators have no ... incentive to prefer the newest airplanes; they profit from the need of passenger airlines to sell their older hardware off.”*)

Aviation’s demonstrable contribution to climate change means that any increase in airport capacity in the UK clearly runs counter to the Government’s climate change commitments. Friends of the Earth sum the situation up as follows: **“Unconstrained aviation growth is inconsistent with current and future UK emissions targets. In 2008 the UK adopted a 2050 target to reduce overall greenhouse gas emissions by at least 80% compared to 1990 levels. The Committee on Climate Change (CCC) indicated that meeting this target requires aviation growth to be no more than 60% above 2005 levels. Following the 2015 Paris Agreement, it now says a more ambitious overall UK target is needed: net zero emissions by 2050. The UK government has accepted the new target. Friends of the Earth welcomes this but believes that net zero by 2045 at the very latest is possible and necessary. The CCC has identified several possible aviation measures to help reach net zero, including further limits on growth.”** (Source: <https://policy.friendsoftheearth.uk/policy-positions/aviation-and-climate-change-our-position>)

At Southampton and Stansted Airports, expansion plans have already been affected by climate change concerns – and these are established airports with existing trade, not untested start-ups beginning from scratch, as the proposed cargo hub at Manston would be, after five years of inactivity on the site following several previous failed aviation ventures. In the case of Southampton, the City Council found itself in the unenviable position of trying to balance support for an established local business with its responsibility for the wellbeing of its residents and the future of the planet. Inevitably, the latter had by far the stronger case, and the Council decided it could not support expansion.

With regard to climate change, a cargo-only airport (which Manston expects to be for at least the first period of its operation) is the most damaging type. Passenger planes which take cargo in bellyhold not only reduce their financial costs, but also reduce their relative emissions cost by achieving both freight and passenger transfer in a single flight. Cargo-only services, by contrast, are both financially more expensive and more expensive in terms of emissions, even before consideration of the likely age and efficiency of the planes in use. Add to this the low capacity utilisation in the air cargo business highlighted by the correspondents on Stack Exchange Aviation above, and we see that cargo airports are a particular problem for our Government's commitment to addressing climate change.

In the case of Manston, RSP Ltd are requesting just under 2% of the total UK aviation emissions budget for 2050 – a hugely risky commitment for the Government to make to an untried company with dubious credentials planning to operate from an airport that has failed previously three times as a commercial venture. If RSP's business plan is to be relied upon, the airport will succeed by taking business from other airports. If this is the case, its climate change impact is reduced, but it is very difficult to see how a National Infrastructure Project can be justified. But if Manston does manage to generate new business in order to justify its potential as a NIP, it could become a significant contributor to climate change.

Climate Change legislation is clearly now an important factor in determining the Planning Inspectorate's advice, such that we are now seeing PINS advising against approval of projects which would undermine the Government's commitment to reducing emissions. One such is the Drax power station in North Yorkshire, which if approved could end up being responsible for 75% of the UK's power sector emissions. On this basis PINS advised the Government against approval – only to be over-ruled in October last year by Andrea Leadsom as Secretary of State for BEIS.

Today we read that environmental lawyers Client Earth have been given permission by the High Court to pursue a Judicial Review against the Government in this case, as the high level of carbon emissions proposed means that Ms Leadsom's decision runs counter to the Government's climate commitment. (Source: The Guardian, 31st January 2020: <https://www.theguardian.com/environment/2020/jan/30/uk-sued-for-approving-europes-biggest-gas-power-station>) It appears highly likely that exactly the same would apply in the case of the Manston project, if the Secretary of State were to decide to undermine the Government's climate change commitments by approving it.

We urge the Secretary of State to restate unequivocally his Government's commitment to tackling climate change by rejecting this DCO application.