

Dear Ms Anderson and the Manston Airport Case Team

Thank you for your letter of 17th January. As an interested party I am writing in response to the invitation to comment on some of the issues raised.

Climate Change

The UK government has set itself goals in terms of addressing the effects of climate change. Experts in relevant fields say that even though we should be more ambitious in our reach, the country faces great challenges if we are to come anywhere close to meeting even these targets. The challenge is greater on a global scale but as an advanced nation we should be way out in front.

Commercial aviation represents a particular problem for at least two reasons. It cannot rapidly respond with technological change in the way that, for example, the motor industry can by going electric. And, probably more significantly, there is an increasing demand for aviation, predominantly in the passenger sector.

With regard to Manston, the applicant estimates that it requires 1.9% of the total UK aviation emissions of 37.5 Mt CO₂ budget for 2050. As far as I can discover airports do not have carbon budgets – it is the aircraft owners and operators who do. This 1.9% appears to be simply another way of expressing the applicant's projected ATM numbers (and perhaps mix of aircraft) in 'environmental' terms. Management of aviation carbon appears to be a very difficult system to organise and police, not least because of the international, cross-border nature of the industry.

With the projected increases in passenger ATMs and the consequent rise in bellyhold capacity, it seems perverse to consider developing a new predominantly freight airport. If (remarkably) it did succeed in attracting business this would most likely be at the expense of far more efficient bellyhold carriage. One of two things is true. Either Manston would get its business by winning freight customers from existing, more efficient, better located airports, from marine transportation, and/or from rail and road freight operators; or it will create new business. If it's the first, then there is clearly no national need for the airport and no net benefit in jobs by awarding the DCO - all we would be doing would be moving jobs from one area to another (and blighting the latter in the process). If it's the second, then all the aviation emissions created would be new emissions, and an addition to the budget that the Government is considering setting for aviation.

From a different angle it is also likely that demand is induced by the supply of transport infrastructure, rather than the other way around. A good example of this effect was the attempt to solve traffic congestion problems by major road-building projects in the latter part of the twentieth century. The increased capacity and initial convenience encouraged greater use, and the roads filled up again. Much the same has happened in shipping since the introduction of containerization.

Recognising that the majority of experts believe that the climate change targets currently in place are woefully inadequate I do hope that the secretary of state will reject the applicant's plans on climate change grounds alone.

Here are some relevant figures and a flavour of expert opinion on this subject.

In its working paper (A40-WP/54 EX/21 5/7/19) *Global environmental trends – present and future aircraft noise and emissions*, the International Civil Aviation Organization (ICAO) notes:

2.2 Trends in Aircraft Fuel Burn and CO2 Emissions

2.2.1 International aviation consumed approximately 160 megatons (Mt) of fuel in 2015. By 2045, compared with an anticipated increase of 3.3 times growth in international air traffic (expressed in revenue tonne kilometres), fuel consumption is projected to increase by 2.2 to 3.1 times compared to 2015, depending on the technology and Air Traffic Management (ATM) scenario.

An article published in the Guardian on 24th January 2020 quotes Corinne Le Quéré, professor of climate change science at UEA; “I find it difficult to imagine we can control emissions from aviation if we continue to build airports. We absolutely need ambitious plans for mobility and transport. We need a plan that covers roads and airports.”

In the same article Dr Charlie Wilson, a reader in energy and climate change at the University of East Anglia said: “We desperately need consistent, concerted direction [from the government] and building new airport capacity is not that.”

Five10Twelve Late Submissions

1. No proven Need Case

I completely support the late submission from Five10Twelve of 17th October 2019 headed Rebuttal to the Applicant’s Overall Summary of Need Case.

I would like to mention that the DCO process was clearly never intended to be exploited in this way. And despite consequently being presented with a goal a mile wide, the applicant at no point managed to score anything other than own goals.

2. Reputational Risk

I support the late submission from Five10Twelve of 23rd December entitled Public Cost and Reputational Risk.

Please note that the applicant was rejected twice as a viable airport operator by the district council, which, at the time, was determined to reinstate Manston as an airport.

3. History, Heritage and Regeneration

I support the late submission from Five10Twelve of 1st November 2019 regarding Historic England’s Risk Register and the recent inclusion of the Ramsgate Conservation Area and Clock House, Royal Harbour.

Ramsgate is architecturally rich and enthusiastic owners and business entrepreneurs have been pouring money and effort into renovating its beautiful buildings.

As a result of the DCO there is damaging uncertainty about the continuing viability of Ramsgate’s regeneration. It is hard to imagine that it could survive aviation activity on the scale proposed by the applicant.

4. Inaccurate Environmental Statement

I support the late submission from Five10Twelve of 27th October 2019 re. the inadequacies and inaccuracies in the Applicant's Environmental Statement.

Kind regards

Alan Welcome

