

From: [REDACTED]
To: [Manston Airport](#)
Subject: For the attention of the Manston Airport Case Team
Date: 08 November 2021 23:23:43

Dear sir/madam,

My ref: MAN - 067

I wish to submit further matters relating to my objections to the redetermination of the DCO of the above case.

(1) NEED

As the conclusions of the previously submitted reports by Allan Stratford & Associates Ltd for Ramsgate Council, the two York Aviation reports, one for Stonehill Park and one for Ms Jennifer Dawes, and the ExA all agree, so too has the DoT commissioned report from Ove Arup & partners Ltd concluded in agreement that :-

There is no pent up demand for airfreight.

There is no lack of runway capacity at existing SE England airports.

That bellyhold capacity constraints do not exist.

Levels of freight that could be expected at Manston are modest.

Geographically Manston would not be appealing to any integrators, current or otherwise in any future changing cargo industry.

Brexit will not serve to increase the need for Manston.

The ExA report provides enough sound and robust evidence that would concur with the Ove Arup report. This latter report confirms also that there are no new material developments which would alter the validity of these conclusions. The final page of the report sums up perfectly that there is no need for the proposed development at Manston.

In a statement made on Thanet Online RSP say that the Ove Arup report is "an amateur and poorly constructed report". They mention the "numerous grammatical errors and typos". They state "that someone has accidentally sent an unfinished draft to the Department of Transport".

Sir Roger Gales contribution to the same article regards the Assessors report as "deeply flawed". He quotes the £150,000 cost and six months to prepare forty one pages, which could have been "written over a weekend" as deserving "no credibility whatsoever". His full critique will be submitted to the DfT.

I relate these missives to illustrate the unreality and denial of the mindset of those who support this proposal. I reiterate here my view expressed in my previous submission on 21/6/21 that the only reason that this proposal is still ongoing is because of the unstinting support and influence of the MP Sir Roger Gale.

During a visit to Manston in Sept 2014 the SoS who was then the Conservative Party chairman pledged "we back you" to the supporters trying to reopen the closed airfield, and went on to say how the MP Sir Roger Gale had lobbied him, the Prime Minister and Parliament "tirelessly". He said that making the airport viable was "much like running any other business". (Kent Online. 14:42 18th September 2014) we all note that this particular business does of course have a well documented history of failure.

(2) JET ZERO & DECARBONISING TRANSPORT.

RSP places much credibility on being net zero from scratch. This is totally irrelevant to green aviation at Manston. Any business is now expected to be as carbon neutral as possible, not just airports. It is the nature of activity which airports are built to serve which creates the noise and pollution, and other than a/c ground movements have little or no influence on that.

This submission is not intended as a platform to express criticism of the governments policy on aviation emissions, but in the context of objecting to the Manston development it is a very relevant issue. The UK governments decisions regarding this policy is being led by the JTZ. The Transport Secretary and Business Secretary are the chairs. The CEO is the Chief Operating Officer of Heathrow Airport. The majority of the members who inform the JTZ are all industry leaders associated with the aviation and fuel industries. Given that considerable amounts of monetary investments are being discussed, one might expect a very optimistic message to be given on what can be achieved technologically in any given timescale.

The problem here seems to be, is that government are only taking notice of what they are hearing from the JTZ and are ignoring what they are hearing from their own advisory body, the CCC, and the wider body of environmental science. Has anyone thought to calculate the amount of aviation emissions which will have entered the atmosphere during the realistic timescale that it will take the industry to achieve net zero commercial aviation? Assuming that such a thing turns out as hoped.

My point here is that because of the protectionism that the government is affording the aviation industry, based no doubt on economic and employment factors, it seems perhaps that Manston is being afforded a somewhat biased judgement in its favour. If, as has been proven, there is no case for need, would it be lawful for the SoS to approve the DCO decision in the face of what is arguably a flawed aviation emissions governmental policy? An article published on 04/11/21 by The Institute on Physics, in Environmental Research Letters, (Airport

Watch) states that “aviation could consume up to one sixth of the remaining temperature budget required to limit global warming to 1.5c by 2050”. It suggests that “emissions produced by the aviation industry must be reduced each year if the sectors emissions are not to increase warming further”. The article is balanced and fair stating that SAF fuels by 2050 would arrest this, but it would require a 90% mix of SAF’s with a sustainable production chain that does not yet exist. Clearly any further airport expansion sanctioned by the government before the industry is proven to be on track to zero emissions would be in direct conflict with its stated aims of net zero by 2050. The recently launched campaign by Stansted Airport Watch publicises some worrying statistics relating to UK aviation emissions which to me can only indicate that the government are following unsound policy by ignoring such facts.

With kind regards, Chris Burrows.

