

From: [REDACTED]
To: [Manston Airport](#)
Subject: For the attention of the Manston Airport Case Team.
Date: 21 November 2021 17:51:27

Dear sir/madam,

My ref: MAN - 067

I am not sure whether the reason for this extended deadline is to comment further on what is missing from the Arup report or whether my first submission sent in on the 08/11/21 sufficiently covers my reasons for objecting to the above case. I wish therefore to submit a further comment to my objection if it is order for me to do so.

RSP seem to think that the deleted section on the 6th carbon budget from the Arup report would somehow strengthen their case for need had it been left in the report. RSP publicly quote the role that their Application could play through a 'CarbonNetZero Manston' in helping 'GOVUK' to meet its carbon reduction targets COP26.

The governments carbon reduction targets regarding aviation has resulted in the Jet Zero policy (JZ) being presented at COP26. JZ sums up by stating that "The government is clear that expansion of any airport must meet its climate change obligations to be able to proceed". I presume that RSP think that by funding the planting of some trees and making their airport infrastructure as green as possible, and financially compensating some local residents for the ensuing noise pollution, that they are fulfilling their case for need. This is not so.

When one considers the criteria for the need case in a DCO application, need comes before environmental considerations. If need is weak, or as in this case non existent, then environmental concerns become purely academic. I think that the Arup report sums this viewpoint up well at the end of 4.3 in its report.

Currently however, environmental concerns are arguably overtaking the case for need. This is worryingly absent from current government aviation policy. Their policy on CO2 reductions relies solely on a perceived solution promoted by the aviation and fuel industries themselves. No account is being taken of the CO2 which will continue to be added to what is already present while these industries work to develop, and then actually produce, these solutions. There is of course no guarantee that they will in any event turn out as hoped.

Much is now published by various bodies which bears out the thinking that the government has adopted a biased approach in favour of airport expansion. Given that cutting the use of coal is proving problematical, as COP26 has shown, then immediate steps in other sectors is even more important now. It follows then that to encourage the aviation sector to grow in any way until it is proven to be on track to have reduced its carbon footprint would be irresponsible.

With this in mind and considering the Manston Application, regardless of what the governments stated policy based on JZ may be, this should not be a green light to override the case of lack of need, which is itself the fundamental issue for the granting of a DCO.

With kind regards, Chris Burrows.

[REDACTED]