

Dear Planning Inspectorate,

I have looked at previous submissions of mine and revisited this question on the “Need” and “what’s changed since Covid” and I can say that there has been a significant change. However, nothing seems to have changed in terms of the elements considered by PINs when advising the SOS to reject the application.

I am encouraged by the SOS requesting further information to identify any change, as it shows they feel it’s now time to provide their justification as to why they did not reject the application and follow the independent advice coming from the incredibly in-depth consultation/investigation carried out by the Planning Inspectorate, but instead misguidedly supported it, only for it to be overturned by the JR.

The ‘*gamer-changer*’ that is ironically bounced around in support of the 24/7 freight hub, is sustainable, greener and environmentally friendly aircraft development! For sure, it may become greener and cleaner than it is today, but that is only one part of the bigger picture of how that will have a significantly negative impact on residents of Thanet, in an aviation world where there is no ‘need’.

I have reviewed my very first submission, having trawled through the 10,000 odd pages of the ‘publicly accessible’ consultation documents, to see what needed changing or updating.

Certainly, there are some areas that may have marginally improved, but to acknowledge this, it has to be accepted that the original points made in my (and many others) submissions were correct – points that led the Planning Inspectorate to advise the Government to reject the application.

Other areas, such as increases in road traffic due to proposed flights (although contradicted by RSP’s own application and their publicity statements) is an area I have experience and knowledge. This will not have ‘changed’ towards an improvement, due to the technology not being anywhere it needs to be for bulkier cabs to be able to have the Horse Power nor range to haul heavy goods long distance.

It seems that this is to be continually ping-ponged between RSP/Local MP and the Government, down the road, at great expense to the tax payer, by accepting, losing, fighting, appealing, appointing a new inspector (until A: the world has changed to the utopian place where air freight is needed in Thanet, delivering no impact on its residents, road infrastructure or environment, or B: those involved have lined their pockets sufficiently that they dissolve away

Health – Nothing has changed - Still the same number of proposed flights (whatever that actually is), still the number of HGV bulkers and still the same level of high Db noise.

Impact Assessments – Nothing has changed and they still highlight “a significant impact” on those in the direct local flight path.

- Attachment 1 - *EU Commission report from 16th July 2015, “Long term exposure to aircraft emissions”*.

- Attachment 2 – The Munich Airport Noise Study.

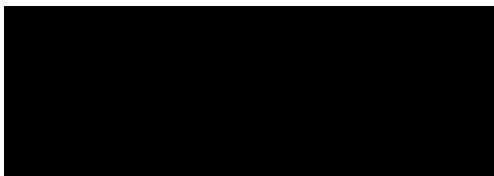
Carbon targets – now adds to this Net figure, as the targets were not in place at the time of the original.

Employment – Nothing has changed in the sense that the number (23,000) has never been publicly qualified for a freight hub that is claiming to be the most technologically advanced.

Passengers – Nothing has changed as the ex-airfield cannot move, therefore the catchment area remains limited by its proximity to the water.

Freight - Unless Covid is to be responsible for the UK to set targets for cleaner/safer air quality but totally ignore this, the position now for this 24/7 freight hub has even less of a place, environmentally, economically or ethically than it did before Covid.

Kind regards,



Matt Feekings



Attachment 1 -
(Matt Feekings) -Lor



Attachment 2 -
(Matt Feekings)-The



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Source: Yim, S., Lee, G., Lee, I., Allroggen, F., Ashok, A., Calazzo, F., Eastham, S., Malina, R. & Barrett, S. (2015). Global, regional and local health impacts of civil aviation emissions. *Environ. Res. Lett.* 10(3), p.034001. DOI: 10.1088/1748-9326/10/3/034001. This study is freely available at: <http://iopscience.iop.org/1748-9326/10/3/034001>.

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Science for Environment Policy

Long-term exposure to aircraft emissions causes premature death

As well as contributing to the greenhouse effect, aircraft emissions have an important impact on air quality and human health. This study, which quantified the effect of civil aviation emissions across the globe, suggests they could be responsible for 16 000 premature deaths every year, at an annual cost of over €18 billion. The air quality costs of aviation were similar to its climate costs, and over 10 times larger than accident and noise costs.

Aviation is becoming an increasingly popular method of transport. According to the [International Civil Aviation Organization](#) (ICAO), the number of air passengers is set to more than double in the coming 20 years. This vast increase is expected to have a similarly drastic effect on air quality, and therefore on the environment and human health. Alongside greenhouse gases, aviation emissions contain fine particulate matter (PM_{2.5}) and precursors of ozone (O₃). PM_{2.5} and O₃ have both been linked to an increased risk of premature death.

This study is the first to analyse emissions at local (~1 km), near-airport (~10 km), regional (~1000 km) and global (~10 000 km) scales. Aviation emissions were based on 2006 levels provided by the [Aviation Environment Design Tool](#), which models aircraft performance to produce fuel burn, emissions and noise data. The impact on air quality was simulated by two widely used chemical transport models ([GEOS-Chem](#) and [CMAQ](#)), which simulate atmospheric chemistry.

The number of premature deaths caused by the emissions was calculated by overlaying air pollution simulations onto population density data, thus determining the pollution exposure of populations in different world regions. The researchers then used [World Health Organization](#) recommended concentration-response functions to quantify the risk of premature death, specifically from lung cancer and cardiopulmonary disease.

The results showed that exposure to PM_{2.5} and O₃ from aviation emissions could be responsible for approximately 16 000 premature deaths every year. Of these, the vast majority (87%) could be linked to PM_{2.5}.

To assign a monetary value to these premature deaths, the researchers determined country-specific values of statistical life, i.e. how much people would be willing to pay for reductions in their risks of dying due to air pollution. For the US, they were based on estimates from the [Environmental Protection Agency](#), while estimates for other countries were modified based on national income per capita.

The researchers estimate that premature death due to long-term exposure to aviation emissions could cost around \$21 billion every year, equivalent to almost €18.5 billion. Europe alone accounts for around €9 billion of these costs — the highest of all regions.

In order to gauge the relative importance of aviation emissions, the researchers compared the health costs of aviation to the costs associated with accidents, climate change and noise. They found that the air quality costs of aviation were in the same order of magnitude as climate costs (which include losses caused by increases in global surface temperature, such as higher flooding risk), and over 10 times larger than accidents (the economic costs of injuries and mortalities) and noise costs (losses in property values — health related costs were not considered).

Continued on next page.

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Long-term exposure to aircraft emissions causes premature death (continued)

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These findings suggest that reducing fuel burning in aviation could provide air quality cost benefits on a scale comparable to climate change mitigation.

Recognising the impact of aircraft pollutants, the European Commission is working hard to reduce aviation emissions. Its [Directorate-General for Mobility and Transport](#) is cooperating with international organisations, amongst which is the ICAO, to address potentially harmful emissions from aircraft, including particulate matter.

