

## **Re-determination of the Manston DCO**

I refer to the letter of 21 October 2021 and am responding as an interested party.

### **Independent Aviation Assessors Draft Report – Ove Arup**

I think it is essential to understand the broad history of this application and the conclusions and recommendations of the examiners who spent many months hearing detailed evidence from the applicant and the many interested parties and experts on both sides. I therefore hope you will access and read all of the representations I and others have made. I consider that all the points and concerns I raised throughout the process to date, including the examination, are as equally valid and relevant today as at the time of their original submission. Please see below (at the end of this document), a table of links to my historic submissions on the subject.

The examiners to the DCO drew the following conclusions:

Clause 8.2.24 The ExA concludes that the levels of freight that the Proposed Development could expect to handle are modest and could be catered for at existing airports (Heathrow, Stansted, EMA, and others if the demand existed). The ExA considers that Manston appears to offer no obvious advantages to outweigh the strong competition that such airports offer.

Clause 8.2.25 The ExA, therefore, concludes that the Applicant has failed to demonstrate sufficient need for the Proposed Development, additional to (or different from) the need which is met by the provision of existing airports.

Clause 8.2.74 the Proposed Development will have a material impact on the ability of Government to meet its carbon reduction targets.

Clause 8.2.177 Direct jobs at the airport would be 19% lower than forecast.

Clause 8.2.180 The ExA has significant doubts over the calculation of direct, indirect/induced, and catalytic job numbers.

Clause 8.2.143 The proposed interference with the Human Rights of individuals is not justified.

Clause 8.2.184 The Proposed Development would adversely affect the tourism industry in Ramsgate.

These were clear and sufficient reasons for the examiners to conclude that the DCO should be refused and it was very surprising that after such a long and detailed examination with this clear conclusion that the SoS sought to ignore and overrule the examiners' recommendation as he did The SoS decision was subsequently quashed following the launch of a Judicial Review supported by the local community raising in excess of £100,000 showing the strong and clear feelings against this project.

The conclusions above have been supported by independent advice from many consultants in the past, at least 10, including Avia Solutions, York Aviation, Altitude aviation, Falcon Consultancy, and Alan Stratford & Associates and more recently by further reports from York Aviation and Stratfords. I

believe Stratfords will be submitting a further report commissioned and paid for by a group of local residents again showing the depth of feeling against this project. We now have your own independent assessor; Ove Arup also agreeing that the conclusions reached by the planning examiners were correct and that nothing has happened since that decision was made that brings that decision into question. The only report that has demurred from this was commissioned by the applicant and carried out by a party with no cargo experience, whose work was based on interviews with a few cargo operators, rather than researched evidence and which during examination was proved not to be any sort of viability assessment, merely some sort of contrived wish list in an attempt to qualify as an NSIP, it has since been widely discredited.

No need clearly means that if this were, perversely, to be granted then it would not succeed. There would simply not be the demand as has been shown, time and again. Therefore, claims about jobs, education and training, benefits etc. would simply not materialise. In the meantime, the area would be blighted and starved of other possible investment.

It is therefore even clearer now that the DCO should be refused.

### **NSIP Categorisation and Need**

The applicants' assertions about need in their representation have been dealt with in detail by Ove Arup, an expert in this field. I am happy to concur with their views, especially as they have been voiced many times before by other eminent experts. In addition these views are supported by the historical evidence of Manston failing as a commercial airport a number of times and the fact that it was for sale for a number of years with no interest.

The applicant argues in their further representation that need is not something that the SoS needs to consider in coming to his decision. I would argue need is at the heart of the decision making process and is central to any conclusion that this project is of National Significance and qualifies under planning regulation for a Development Consent Order.

RSP have submitted an application for Manston to be considered as an NSIP - a Nationally Strategic Infrastructure Project. This is a mainstay of the whole DCO process and the bar for meeting the criteria for an NSIP is quite high as it should be. The national need (not local, not RSP), the national need must outweigh the negative impacts - e.g. environmental impacts, health impacts etc. It has been evidenced time and again in so many reports that there is no national need and without this the project is not a NSIP. The latest independent assessor report from Ove Arup again emphasises that, even in light of everything that has happened in the last 2 years, there is no need. So, no need but very much the opinion of independent assessors and other experts that the permanent negative impact on Ramsgate is very real and obvious.

In order for an airport to qualify as a NSIP it must be capable of increasing air traffic movements ("ATMs") with respect to cargo by 10,000. It must therefore be incumbent on the applicant to demonstrate that this is a realistic likelihood. The applicant cannot apply for a DCO on the basis that it will build a structure that would be capable of increasing ATMs but that no ATMs would actually occur. Need is therefore crucial to the definition of a NSIP and the qualification of a project to use the DCO procedure. If a project is not a NSIP a DCO cannot be applied for.

In the case of this project we have clear evidence from many aviation consultants including now Ove Arup that there is no need for an airport at Manston, the need case is not proven, and therefore the likelihood of the project accruing 10,000 ATMs is zero. On this basis the project is not a NSIP, cannot be determined under the DCO legislation and must be refused for that reason alone. The SoS also needs to look at how the ATMs were calculated by Azimuth in order to create the number they specify, as it seems clear from evidence from York Aviation and others that they have manipulated this number given the freight ratios they have used to achieve the target ATMs required to qualify for a NSIP.

It cannot be that a project that has no need should be afforded the rights conferred under a DCO, that's not the purpose of the legislation. The DCO must be assessed on the balance of positive and negative attributes and without need there can be no positive attributes to balance the negatives of which the examiners listed many.

The examiners focussed on this point extensively during the examination as it is a key determinant as to whether a DCO should be approved. York Aviation provided clear evidence on this point as did many other interested parties. This led the examiners to conclude that need was not proven.

We should not forget that the Airports Commission when choosing its preferred airports for expansion considered but did not include Manston as an option. This from their report - 2.23 "The Airports Commission consulted widely on its appraisal framework, which contained its criteria for sifting proposed schemes, and the Government is satisfied that the appraisal framework was appropriate. The Airports Commission received 52 proposals, with three options developed by the Airports Commission itself. The Airports Commission took advice from a number of relevant stakeholders, including NATS Holdings, the Civil Aviation Authority, Network Rail, and the Highways Agency (as it then was). The Government believes that the Airports Commission has analysed all the options put forward to the appropriate degree of detail, and discounted non- shortlisted schemes fairly and objectively according to the sift criteria. The Government does not consider that any of the non-shortlisted schemes represents a reasonable alternative to its preferred scheme."

The applicant has sort to partner with various colours of councils in the past all of which have refused their approaches as they had no confidence in the sponsor or their claims that an airport was needed and would be successful. Let's not forget that the sponsor failed to demonstrate that it had funding in place for the project, to Thanet District Council on a number of occasions and also the inspectors during the examination, despite many reminders and extra time allocation to do so. If the sponsor had a valid case then;

- a) The Labour administration at Thanet District Council (TDC) would have partnered a CPO with them.
- b) The UKIP administration which replaced the Labour one at TDC would have partnered a CPO with them.
- c) The planning inspector would have granted the DCO.
- d) The Judicial Review challenge against the SoS would have failed.

e) Ove Arup would have found significant evidence supporting the SoS decision and the sponsors case.

## **Jobs**

A large number of representations for the project respond on the basis that jobs will be created by the airport a claim that the applicant has been keen to build on. Whilst jobs are indeed required in Thanet and East Kent, although recent comments from Sir Roger Gale MP seem to suggest we have a shortage of people to fill jobs at, for instance, Thanet Earth where he tells us produce is being wasted as there are no pickers, we must be cognisant of the comments from the examiners and other consultants who question whether the job numbers have been calculated correctly with the appropriate multiplier, whether they have been categorised correctly, whether they will in fact be delivered and whether they will merely be jobs taken from elsewhere in the UK, so no national increase or benefit.

It is hard to conclude that if there is no need for the airport any jobs will be created. In addition we must surely look at the net jobs created something the examiners adhered to when they reflected that the tourism industry in Ramsgate would be seriously undermined by this project. Representations from other parties in the creative industry generally have also voiced concerns that jobs will be lost.

The applicant makes much of the construction jobs that will be created. These will be transient jobs that will no doubt be filled by experienced large scale construction companies with specialist staff residing outside of Thanet so no real local benefit. In any case there is already a shortage of construction staff nationally so building an airport that's not needed will divert scarce resource from real projects.

In order for a project to receive support from The Secretary of State it must be shown that it is in the public interest and of national significant importance. One issue that RSP raise as being of significance is the number of jobs that an airport at Manston will generate. They make this claim notwithstanding the low number of jobs it generated in the past and the RSP claim that they will use up to date technology which generally reduces the number of jobs in an industry. RSP have already said that ATC services will be done remotely, so these high skilled jobs will not be done locally and will be incorporated into operations elsewhere perhaps with no job number increase at all.

The sponsor has made much of the large number of jobs that will be created by the project. In Volume IV of the RSP submitted document 7.4 Azimuth Report on page 17 the sorts of jobs suggested to be created are Direct, Indirect (employment in the supply chain), Induced (jobs created by those connected to the airport spending their income) and Catalytic (those associated with the aviation sector outside the local economy where the airport operates). In order for these job creations to be properly claimed on a national basis they must be jobs that are newly created as a result of the nationally significant project adding to the wealth of the UK. If the direct jobs created at Manston are the result of the new airport taking business from other UK airports then no new jobs have been created in the UK, there is no national importance to the project and it cannot be claimed to be in the public interest. Taking business from Stansted to Manston with Manston creating 5 jobs and Stansted making 5 people redundant does not create any jobs and is not in the public or national interest. In addition, the other types of jobs that RSP identify and claim will be derived from

an operation at Manston will only be derived if there is an increase in the overall activity in the UK. Bringing flowers from Holland to Manston instead of Holland to Luton does not have any effect on the supply chain at all. Taking business from one airport and moving it to another also merely moves catalytic employment from one area of the UK to another, this is not in the public interest or of national significance.

RSP and Dr Dixon do not seem to appreciate the points above. In the RSP document 7.4 Azimuth Report Volumes 1-4 various claims are made about job creation. However on closer inspection we find that these jobs are not new jobs for the UK but jobs which will be created at Manston but lost elsewhere in the UK at another airport. I list below a number of examples but there are many more.

1. In Volume I on page 39 Clause 6.4.11 and 6.4.12 talk about the trucking of freight, the suggestion being that this freight could be flown in to Manston instead. This does not create jobs in the UK, trucking jobs will be lost, trucks will be decommissioned leading to less demand for trucks thereby losing jobs in vehicle manufacturing. As no new product has been created there will be no indirect jobs created. Catalytic jobs will just be moved.

2. In Volume II on page 39 all of the items described are already activities undertaken by existing companies flying into UK airports. Merely moving these operations to Manston does not create any new jobs of any of the RSP categories in the UK. Clause 4.2.41 mentions Harrods Aviation which currently operates at Luton and Stansted with an engine shop at Farnborough. Moving these to Manston does not create new jobs in the UK.

3. In Volume II, page 56 Section 5.1 is titled Attracting air freight to Manston Airport. It suggests that freight would move from Heathrow to Manston. This again does not create new jobs in the UK. On page 57 there is a section on channel crossings and trucking but again, movement from one form of transport to another does not create jobs in the UK. Page 58, Clause 5.1.12 - Changes to preference for belly freight - talks of carriers moving from belly to dedicated freight operations. Again, this does not create new jobs in the UK it's just job displacement.

4. In Volume III on page 7 at Clause 2.2.10 it talks about the calculations done by Dr Dixon taking into account the cost of switching airports when considering whether integrators and freight forwarders move to Manston. Again this does not create new jobs in the UK. On page 12 Section 3 describes the benefits for businesses that move from other airports to Manston. Again, moving operations from one airport in the UK to another is not creating new jobs in the UK.

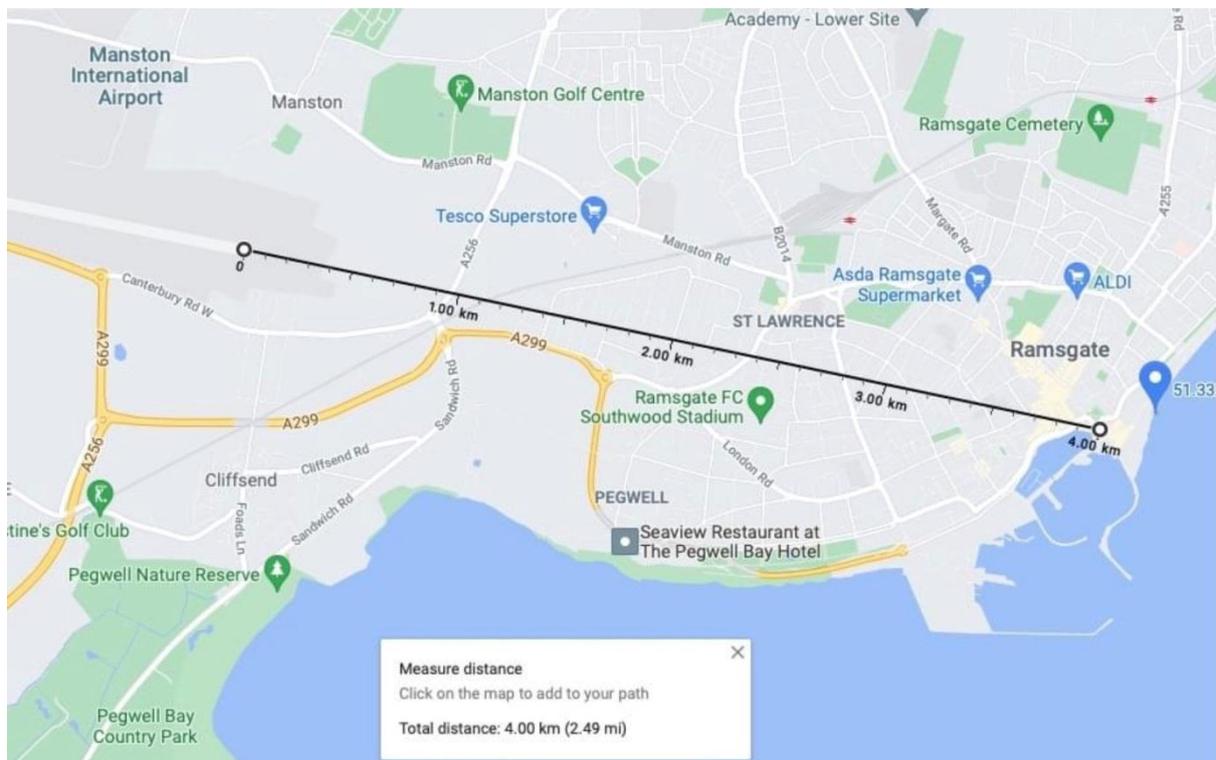
5. In Volume IV page 32 at 5.5.1 they talk about TG Aviation creating new jobs at Manston. This is a company that was historically based at Manston but moved away from the site after a dispute and legal case with the owners. TG Aviation still exists locally in Kent so jobs were never lost and no new ones will be created if they move back to Manston. Clause 5.5.2 talks about Polar Helicopters, a company that continues to operate at Manston, and I have not seen anything to suggest that would change if the DCO were not granted. These are not new jobs and any further jobs created via expansion would do so whether the DCO was approved or not. Likewise for AvMan Engineering; indeed the alternative plans for the site from SHP envisage an advanced manufacturing and engineering business park within which AvMan could no doubt expand. On page 32, Clause 5.5.5 it mentions MRO activities, these like the others above should not be considered as they are not part of the DCO which is purely based on freight operations.

6. On page 54, Clause 9, Conclusions they talk in Clause 9.0.2 about the number of jobs created by both freight and passenger operations, however this DCO is based purely on freight so in assessing its benefits, any employment from passenger operations must be ignored as must those in MRO, TG Aviation, Polar Helicopters, AvMan Engineering etc. In addition, as detailed above, a number of the jobs claimed will be those displaced from other airports in the UK which, when assessing the project for public interests and national significance purposes, should be removed.

### Misrepresentation of Distance by Applicant

The applicant claims that Ramsgate is 4km from the end of the runway and this appears to have been accepted by Ove Arup in their report. However this is rather disingenuous as 4km is actually the coastline of Ramsgate, see map below.

The distance from the runway to the first house is just 1.3Km, to Ellington Park a built up residential area is 2.9km. Planes, once they reach the coast will be at between 300 and 500ft (I have actually witnessed them when the airport was last active), much lower when they are closer to the airport as at Nethercourt, will fly over 40,000 residents including 10,000 children at 31 schools affecting the education of all involved as classes will have to be stopped as teachers won't be heard. This will seriously affect the government levelling up agenda as education must be at the heart of it.



### South East Region of the Chartered Institute of Logistics and Transport CILT Representation

I found this representation quite odd in that I can find no record of the institute having commented during the examination or subsequently other than this one. However I am now advised that Sally Dixon who is the “aviation expert” employed by the applicant is a member and may well therefore

have either written or facilitated the response. I am also advised that the CILT as a whole do not endorse the Kent branch report.

### **Climate Change**

The climate change effects of this project are clear and have been accepted by the examiners in their report. The UK's Sixth Carbon budget (22nd June 2021) implies that there can be no more than a 25% air traffic increase between 2018 and 2050 to meet net zero requirements and this has already been allocated to other airports. The applicant claims to be able to build a carbon neutral airport however I question whether the calculations include the carbon footprint of the many tonnes of cement that will be required to build the infrastructure the applicant claims will be built. In addition as many have pointed out, the carbon exposure from airplanes must be accounted for somewhere and it seems logical that an airport that facilitates plane movements should bear a share of this cost.

### **Other uses for the site**

The previous owners of the site, Stone Hill Park, had ambitious plans for a mixed use site incorporating much needed housing, working with Homes England, together with infrastructure like schools, GP surgeries, swimming pools and leisure facilities and in addition a manufacturing site. There were also plans for a film studio but because of Thanet District Councils wish to support an airport that has now been built in Ashford creating many high quality jobs.

The UK desperately needs more housing and a mixed use development as was previously proposed would have been ideal. There are those that are against additional housing in Thanet that have been persuaded to support the airport on the basis that if the airport is protected for aviation then houses will not be built. Despite being told that this was not the case it was believed by many but now they are seeing that the 2500 houses planned for Manston are now being built elsewhere in Thanet, In Birchington, Westgate Cliffsend and elsewhere but of course without the infrastructure as there is no space for it. I suspect many now regret supporting the airport.

The site has multiple potential uses. There is for instance still demand for film studio sites in the UK with an additional one now being built in Hertfordshire already. There is a need for giga battery factories throughout the UK and the Manston site is big enough to incorporate this as well as vehicle manufacturing. There is scope for solar and wind power to be generated on the site perhaps to power the first site of green houses to be built in the UK. Any of these options would create real sustainable jobs in clean industries improving the UKs credentials for delivering on COP26 ambitions.

I note with interest the recent article in The Guardian regarding Grant Shapps obsession with flying given his personal interest but I think this needs to be kept in perspective. This project has been deemed to be of no need by multiple experts, failed historically, and therefore we must look at other appropriate uses for the site. The government must not allow the obsession of one of their ministers to override, as it seems he has done elsewhere, what is sensible and needed for a disused, previously failed airport site.

### **Other Issues**

There was much debate about night flights during the examination and despite RSP statements that they did not require, and would not permit, night flights the examiners concluded that there would

in fact be flights at night as the applicant had specified a quota count for flights during the night period and had stated in their application that there would be on average 7 late arriving flights each and every night. It is clear that RSP intends to utilise night flights in their operation and this is not surprising given it is required at other freight operations in the UK. In addition, York Aviation concluded in a report for Infratril, a previous owner of Manston, that "Importantly, the Airport has identified that the night noise policy needs to be put in place at this time as attracting additional regular air freight services, some of which will need to operate at night, is **critical** to improving the financial viability of the Airport". The impact of the development on the residents of Ramsgate and Herne Bay has been significantly underestimated as night flights have not been included in any of the assessments undertaken by the applicant and on this basis their application is misleading and seriously flawed.

The residents of Ramsgate and Herne Bay surely deserve the same protection from aviation noise as those surrounding London City Airport. On that basis I hope that, should you, for some bizarre reason, approve the DCO, you will strengthen protections within the DCO forcing RSP to accept noise contours produced independently by the CAA and submitted by Five10Twelve, rather than their own contrived contours produced by someone with no experience of producing them, provide mitigation at 57db and ban any form of flights at night save for humanitarian flights.

Noise is very big issue with this project as planes will come in to land very low over the town of Ramsgate with a population of 40,000 people including 10,000 children at 31 schools. In a recent letter to Feryal Clark MP, Robert Courts stated "The Government's policy is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise. We are fully supportive of the need to protect communities from the adverse effects of aircraft noise and realise the importance of noise issues to local communities." I hope he will be giving the residents of Ramsgate the protection he describes.

The focus on air pollution has gathered pace with the acceptance by the courts that it caused the death of a young child. As part of its commitment to tackling climate change, the government have long sought to phase out a highly toxic and dangerous substance, tetraethyllead, which forms part of the fuel used in planes similar to that owned by the SoS Grant Shapps. Last April, however, Martin Robinson, head of the biggest group representing aircraft owners and pilots, contracted Mr Shapps asking if the government could extend a transition period before an eventual ban. He says the transport secretary responded: "On it." With 38,000 general aviation flights proposed by the applicant the harm to the residents of Ramsgate and Herne Bay from this issue will be immense.

You will have seen representations from Michael Child and others regarding the assertion that the applicant has not considered the ultra-fine particles that are a consequence of planes taking off and landing, a key issue for Ramsgate where planes will be around 300/500ft above 5 storey Georgian houses. I attach a recent letter from MP Richard Burgon raising concerns about expansion at Leeds Bradford airport, in particular regarding ultra-fine particles. Manston airport is much closer to residential areas than Leeds Bradford so these issues are even more serious for Ramsgate.

One other change that I believe has happened since the examination relates to the corporate structure of RSP. I have addressed this issue in earlier representations and questioned whether it is right that the UK government uses its statutory powers to award a DCO to a company whose ultimate owners reside behind a veil of secrecy in an offshore jurisdiction and who on that basis will

never pay UK tax. The initial ownership of RSP was based in Belize, it then changed to The British Virgin Islands and more recently to Panama. I attach separately a company structure diagram.

Finally, during the examination there was debate as to who should have to pay for road infrastructure changes and enhancements, should it be Kent County Council or the applicant RSP. A decision, unfairly in my opinion, was made that these considerable costs should be borne by KCC. However following the COVID pandemic and the increased costs this will have brought to KCC perhaps during your re-determination you can consider this issue again and reallocate these costs to RSP who are the party that will have caused these expenses and who will benefit from the infrastructure, whilst of course remaining a non UK tax payer (as above).

I fully support the original conclusion of the Planning Inspectorate and now Ove Arup, that this application should be declined. The passing of time and the events of the past year have only added weight to the arguments against development of the Manston site into an airport, making the case for refusal of the application even stronger.

Yours sincerely

Adem Mehmet

**Encs:**

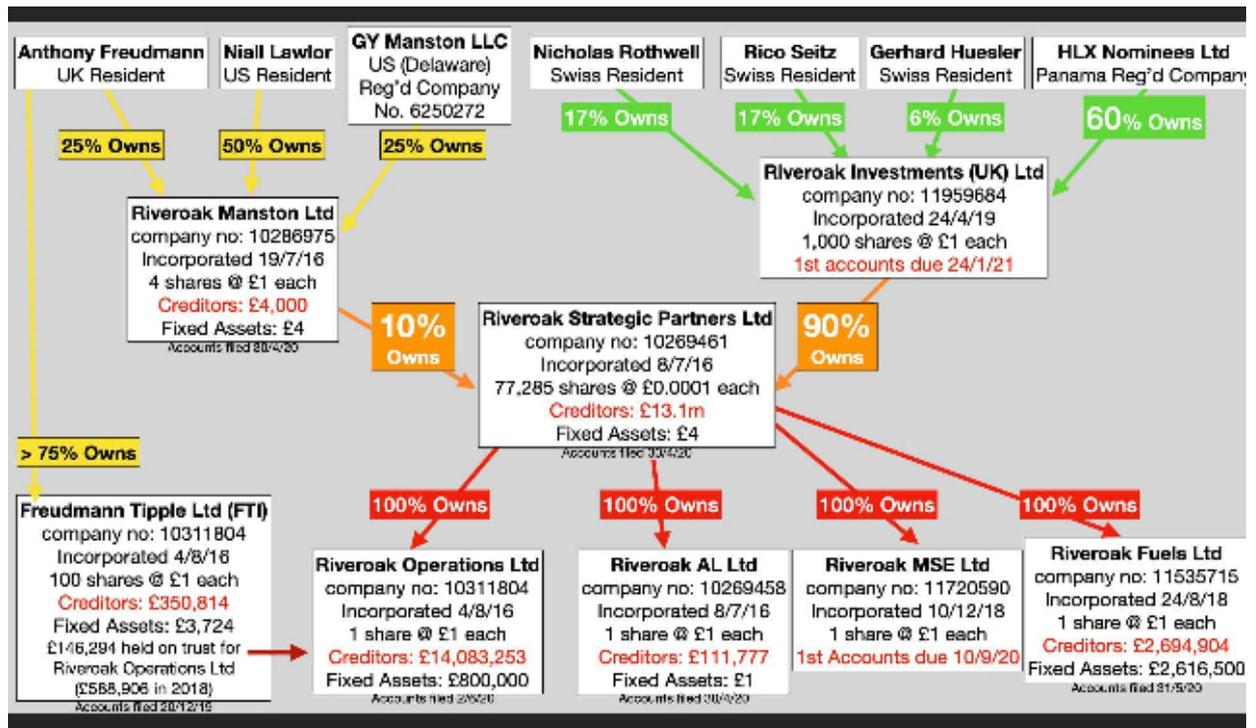
1. Letter from Richard Burgon
2. RSP Corporate Structure diagram

**Previous Submissions with reference numbers from the Examination Library (as relevant)**

AS-064	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003924-AS%20Adem%20Mehmet%201%20Final.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003924-AS%20Adem%20Mehmet%201%20Final.pdf</a>
AS-078	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003936-AS Adem%20Mehmet.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003936-AS Adem%20Mehmet.pdf</a>
AS-082	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004012-AS Adem%20Mehmet%202.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004012-AS Adem%20Mehmet%202.pdf</a>
AS-157	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004374-AS%20-%20Adem%20Mehmet%20-%20Manston%20DCO.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004374-AS%20-%20Adem%20Mehmet%20-%20Manston%20DCO.pdf</a>
AS-234	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004592-AS%20-%20Adem%20Mehmet%20-%20Noise-Insultation-Policy.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004592-AS%20-%20Adem%20Mehmet%20-%20Noise-Insultation-Policy.pdf</a>
AS-235	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004593-AS%20Adem%20Mehmet%20Re %20Manston%20Airport%20-%20Noise-Insultation-Policy_Redacted.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004593-AS%20Adem%20Mehmet%20Re %20Manston%20Airport%20-%20Noise-Insultation-Policy_Redacted.pdf</a>

AS-236	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004641-AS%20-%20Adem%20Mehmet%201%20Manston%20DCO_Redacted%20FINAL.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004641-AS%20-%20Adem%20Mehmet%201%20Manston%20DCO_Redacted%20FINAL.pdf</a>
REP1-061	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-002927-Adem%20Mehmet%20-%20under%20s69.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-002927-Adem%20Mehmet%20-%20under%20s69.pdf</a>
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REP3-264	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003321-Adem%20Mehmet%20-%20Written%20Representation.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003321-Adem%20Mehmet%20-%20Written%20Representation.pdf</a>
REP4-070	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003593-Adem%20Mehmet%20-%20Comments%20on%20Local%20Impact%20Reports%20-%20Thanet%20District%20Council.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003593-Adem%20Mehmet%20-%20Comments%20on%20Local%20Impact%20Reports%20-%20Thanet%20District%20Council.pdf</a>
REP4-071	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003594-Adem%20Mehmet%20-%20Comments%20on%20WR.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003594-Adem%20Mehmet%20-%20Comments%20on%20WR.pdf</a>
REP4-072	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003592-Adem%20Mehmet%20-%20Comments%20on%20Local%20Impact%20Reports.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003592-Adem%20Mehmet%20-%20Comments%20on%20Local%20Impact%20Reports.pdf</a>
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REP4-100	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003680-Adem%20Mehmet%20-%20Late%20Submission.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003680-Adem%20Mehmet%20-%20Late%20Submission.pdf</a>
REP5-034	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003807-Adem%20Mehmet%20-%20Deadline%205%20Sub%202.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003807-Adem%20Mehmet%20-%20Deadline%205%20Sub%202.pdf</a>
REP5-035	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003807-Adem%20Mehmet%20-%20Deadline%205%20Sub%202.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003807-Adem%20Mehmet%20-%20Deadline%205%20Sub%202.pdf</a>
REP5-036	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003808-Adem%20Mehmet%20-%20Deadline%205%20Sub.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003808-Adem%20Mehmet%20-%20Deadline%205%20Sub.pdf</a>
REP5-037	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003809-Adem%20Mehmet%20-%20Response%20to%20D4%20submission.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003809-Adem%20Mehmet%20-%20Response%20to%20D4%20submission.pdf</a>
REP5-038	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003810-Adem%20Mehmet%20-%20Response%20to%20Funding.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003810-Adem%20Mehmet%20-%20Response%20to%20Funding.pdf</a>
REP5-039	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003811-Adem%20Mehmet%20-%20Response%20to%20Night%20Flights.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003811-Adem%20Mehmet%20-%20Response%20to%20Night%20Flights.pdf</a>
REP6-060	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-">https://infrastructure.planninginspectorate.gov.uk/wp-</a>

	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004010-Adem%20Mehmet%20-%20Deadline%206%20Submission.pdf">content/ipc/uploads/projects/TR020002/TR020002-004010-Adem%20Mehmet%20-%20Deadline%206%20Submission.pdf</a>
REP8-037	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004294-Adem%20Mehmet%20-%20Manston%20Airport%20DCO.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004294-Adem%20Mehmet%20-%20Manston%20Airport%20DCO.pdf</a>
REP8-038	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004237-Adem%20Mehmet%20-%20Manston%20Airport%20DCO.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004237-Adem%20Mehmet%20-%20Manston%20Airport%20DCO.pdf</a>
REP8-039	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004269-Adem%20Mehmet%20-%20Manston%20Airport%20DCO%20-%20RSP%20Accounts.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004269-Adem%20Mehmet%20-%20Manston%20Airport%20DCO%20-%20RSP%20Accounts.pdf</a>
REP9-029	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004454-Adem%20Mehmet%20-%20Manston%20DCO.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004454-Adem%20Mehmet%20-%20Manston%20DCO.pdf</a>
REP9-030	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004484-Adem%20Mehmet%20-%20DCO%20Submission%2028%20June%202019.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004484-Adem%20Mehmet%20-%20DCO%20Submission%2028%20June%202019.pdf</a>
REP11-020	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004651-Adem%20Mehmet%20-%20Manston%20DCO%20-%20SHP%20sale%20to%20RSP.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004651-Adem%20Mehmet%20-%20Manston%20DCO%20-%20SHP%20sale%20to%20RSP.pdf</a>
Response to the Secretary of State's Consultation of 17 January 2020	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005227-Adem%20Mehmet%20DCO%20Submission%20January%202020.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005227-Adem%20Mehmet%20DCO%20Submission%20January%202020.pdf</a>
Response to the Secretary of State's Consultation of 11 June 2021	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005649-Adem%20Mehmet.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005649-Adem%20Mehmet.pdf</a>





**Richard Burgon MP**  
Member of Parliament for East Leeds

Rt Hon Robert Jenrick MP  
Secretary of State for Housing, Communities and Local Government.  
Ministry of Housing, Communities and Local Government  
2 Marsham Street  
London  
SW1P 4DF

12th March 2021

Dear Secretary of State,

I am contacting you on behalf of many of my constituents who have raised concerns about the proposed expansion of Leeds Bradford Airport (planning application 20/02559/FU). This application includes a new terminal building alongside substantial changes and additions to the airport.

I objected to this proposed expansion, as did the Members of Parliament for the Leeds Central, Leeds West, Leeds North East and Leeds North West constituencies. It would have an environmental impact upon the people and communities we represent and, indeed, contribute to the situation of environmental danger faced by all of our society - locally, nationally and internationally.

Thousands of objections, from residents and organisations in Leeds and throughout West Yorkshire, were submitted to this planning application to expand Leeds Bradford Airport, which was conditionally approved at the Council Planning Hearing on 11th February 2021.

As I have said previously, in the National Planning Policy Framework (NPPF) used by Councils when evaluating planning applications, paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. It is clear that the proposed Leeds Bradford Airport expansion does not meet the objectives set by the NPPF as it would compromise the ability of future generations to meet their own needs.

One of the key reasons behind the decision to approve the expansion of the airport rested upon the incorrect presumption that emissions from airports and the aviation sector generally are not an issue a local authority has to take into account when assessing planning proposals. This presumption is in contradiction to the Climate Change Committee's guidance to the Government which can be found here:

The United Kingdom is under various international obligations to reduce our carbon emissions and under the Paris Agreement the UK is bound to limit the global temperature rise to well below 2C. In addition the UK Climate Change Act commits the UK to be net zero by 2050. The impending climate catastrophe necessitates going further and faster than this, however the proposed Leeds Bradford Airport expansion (20/02559/FU) - literally - flies in the face of even these commitments.

The ultra fine particles that come from jet engines are now one of the major health concerns in relation to any airport expansion. Not only are these produced at take-off and landing but have been found 14 miles from an airport and on the basis would affect people living in my constituency. New research has shown that these particles can have serious adverse health impacts even at levels lower than the current World Health Organisation guideline limits.

Due to the very serious environmental considerations related to this planning application, I am calling on you, as Secretary of State for Housing, Communities and Local Government, to consider the UK's national and international obligations related to this development.

Please take this correspondence as formal notice that I am hereby registering my request that the Government "call in" this planning application, with a full and independent inquiry to rigorously assess this matter.

I look forward to receiving your prompt reply regarding your decision.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

**Richard Burgon MP**