

Mark de Pulford (Thanet resident and NNF member)

- Two points about the identification of principal issues. Raised with some diffidence, Sir, as you and the PINS team have put forward a net that's capable of catching quite a lot of the detail of what I am talking about it. But these two issues are actually more than the sum of their constituent parts. I believe that they are principal issues. How you look at them affects how you look at nearly everything else.
- No 1 is the validity of the applicant's assertions and assumptions about the realistic "worst case". This is more than an operational judgement about ATMs. We need to look a spectrum of possible worst cases, fully contextualised and stress-tested. This topic is the 'elephant in the room' of every single calculation in the application before you. It is the basis for qualification as an NSIP. It the basis for calculating economic benefit. It is the basis for calculating environmental harm. And it has a special legal significance in planning terms, as you will know much better than me.
- Not getting into detail today, but the inescapable key fact is that the applicant is asking permission to build 19 aircraft stands. What is the "worst case" in terms of the number of ATMs from 19 stands? The applicant admits that 19 stands could handle over 80,000 flights. But he has based every single one of his calculations of economic benefit and environmental harm on a 'worst case' figure which is less than a quarter of the potential maximum. He says that this lower figure is actually the 'realistic worst case'. Why? Because of his belief that the freight market will react to Manston in the way a report by his team says that it will. The validity of that belief - and the accuracy of the calculation - are of fundamental importance to assessing this application
- Sir, the application before you isn't proposing any cap on flights, day or night. It is asking you to accept what someone says is the logic of the market. But that same someone admits - in terms - that the past is no guide to the future, especially post-Brexit. If the Secretary of State agrees this proposal as it stands they can build 19 stands, with no cap on the number of flights day or night - and they can allow in older, noisier aircraft which are banned from the main UK airports. We need an thorough and independent examination of how the market could react to that, post Brexit - and post phasing out of night flights at Heathrow. We need to examine a realistic range of "worst case scenarios" – very small movement up and down of the gross ATM figure makes big differences to the size of the noise contours, the environmental impact, compensation, affordability, profitability.
- The realistic 'worst case' is too important simply to take on the basis of the applicant's reckonings – or to be rolled up with secondary topics. So the request, from me and from the No Night Flights organisation – is for specific examination and a serious reality check in the light of the actual capacity of the 19 stands he proposes to build and given the absence of any enforceable provisions to cap ATMs, day or night.
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- No 2 is a call for another very serious and systematic reality check. I'm talking about what you Chairman called the bedrock of the Examination. This is ground truth of what actually happened when jet freighters were flown over Ramsgate and Herne Bay prior to closure of the airport in 2014. This is the real local impact to which you Chairman said you would have particular regard.

- Extensive data for this reality check is available, Sir and a lot of it, though it has been glossed over in the application. Please don't dismiss it as mere background or technical footnotes. The data is priceless for at least two reasons. First it tells you what the official noise monitors, acoustics consultants, pollution experts and others reported to an official committee - the airport consultative committee - in over ten years of experience.
- These data are voluminous but they are tremendously important because they give rise to a whole series of doubts about the noise contours and pollution predictions put forward in the application. Those predictions are based mainly on theory. You have the opportunity to balance them against the truth. Truth told by calibrated noise monitors at each end of the runways as well as data on runway usage, data on the nature, type and timing of each flight, which runway it used (overflying Ramsgate or Herne Bay) and associated complaints from the public .
- This gives you the actual sound pressures and SOAEL contours produced by aircraft, some of which are precisely the same type the applicant proposes to operate, namely 747-400s . The consultative Committee also received detailed reports on the noise foot prints from an Airbus A380. You can see the contours over Ramsgate and Herne Bay produced by these super jumbos, on much lower numbers of freighters than the applicant is proposing.
- The second reason this actualité is important because when you examine it – especially the records of the Consultative Committee – you get a perspective on precisely the kind of promises, predictions and masterplans you have in the current application. You will see numerous confident business forecasts since 1999. You will see all kinds of assurances about jobs, about night flights and about noise. You will also see them turn to dust as the market predictions are confounded. You will I think understand better why local people are asking you to look at the recent history very carefully indeed.
- I think that this is a good example of where local evidence can make a big contribution to understanding and I would ask you to make specific provision for examining it.