

From: Ros McIntyre [<mailto:rosmcintyre@vividchange.co.uk>]
Sent: 19 January 2019 14:08
To: Manston Airport
Subject: Written summary of oral submission made on 9th January - my ref 20014158

Dear Sir/Madam,

I have just received your new timetable and noted that you have asked for the first time for written summaries of representations made on 9th January. Please find mine attached. Apologies for not getting this to you yesterday – I saw the new timetable for the first time today.

Kind regards,

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Ros McIntyre – Interested Party - ref 20014158

Compulsory acquisition – There is no evidence that RSP has carried out any assessment of where a new national dedicated freight airport (if one were needed) would best be placed in the UK. In the absence of any national policy setting out the need for a new dedicated freight airport in the South East of England, the ExA should interrogate the applicant under “Alternatives to Compulsory Acquisition” as to what assessment, if any, it has made of alternative locations for this new dedicated freight airport.

Compulsory acquisition – I assume that the ExA will explore as a matter of course the benefits of the owners’ plans for the land that will be lost to the local economy and local population should a DCO be awarded to RSP?

Local policy – the ExA should pay close attention to the evidence-based draft Local Plan, which was some years in development, and that was overturned by the current minority administration at TDC without having adduced any new evidence. Germane to this is an examination of the role that local politics has played this year in overriding years of evidence-based work by officers and external experts. I refer here to the instruction by a Conservative TDC Councillor (now Leader) to RSP to ignore the statutory submissions made by TDC’s officers to RSP. The full suite of submissions by TDC’s officers should be taken into account.

Need – The ExA should examine the work of aviation consultants such as Altitude, York Aviation, Avia and Falcon consultants as well as the conclusions of the DfT. It should also take account of the critiques submitted by No Night Flights to date. The ExA should commission its own independent aviation experts to advise it on national need and on the potential viability of a dedicated freight airport on the Manston site. As part of this the ExA should inform itself as to the past performance of a dedicated freight airport at Manston. The application rests solely on the work of [REDACTED]. That work is fundamentally flawed. It takes no account of the decline in the number of UK dedicated freight ATMs, nor does it take account of the DfT’s published forecast of future need.

Noise – the ExA should interrogate the applicant as to its failure to present a “worst case” noise scenario to the public as part of the statutory consultation. The applicant relied on 17,100 ATMs in the development of its noise contours. The applicant has now submitted a proposal for an airport with a capacity of 83,000 ATMs and no cap. The noise contours in the EIA clearly do not represent the worst case.

Noise – the applicant’s noise contours are incomplete and take no account of historical measures of noise when the airport was operational, nor do they reflect the noise contours produced by experts such as Bureau Veritas in the past. The ExA should ask the applicant to produce noise contours that reflect the recorded reality. It should also question the applicant on its claims about runway preference as these run counter to actual past experience and seem to ignore immovable influences such as the prevailing wind direction. The ExA should commission its own independent noise expert.

Noise – the applicant has produced a shifting story about night flights. It now proposes no ATM restrictions on night flights and the ability to operate flights rated as QC4 at night. The

applicant has taken no account of past experience of the impact of night flights and the long track record of complaints from residents. Previous experts have concluded that there was no economic justification for night flights. As yet RSP has not produced any economic evidence that would overturn that conclusion.

Noise – considerable attention should be given to the applicant's baseline data and how it was produced. The ExA should ask RSP to disclose the ownership of the locations chosen for the noise monitors used to prepare this data. It is of great concern that a number of them are the residences of known airport supporters.

Public health – the ExA should pay attention to the fact that the Health Impact Assessment was not available to the public as part of the statutory consultation. It should also pay particular attention to the local population and to the fact that it is recognised that this is a population that has poorer health outcomes than the national average.

Directors – I note the welcome inclusion of an examination of the RSP Directors and their standing. The ExA should inform itself in particular of the track record of aviation failure of ██████████. Not only did he preside over the failed freight airport Manston, but he led the acquisition of, and the development of joint ventures relating to, a number of other former military airports. ██████████ advised on a number of these ventures. All were destined to be cargo airports. All failed. This is a consistent track record of failure in the ability of ██████████ and ██████████ to assess accurately the potential of an airfield or a location for a cargo airport.

S.106 – I note that the ExA is asking for a copy of the S.106 agreed in 2000. If that S.106 is to have any bearing on this process then the ExA should also inform itself of the reviews that have taken place of the S.106 since then, including a period of public consultation, and the Council's recorded position that the S.106 is out-of-date and not fit for purpose.

Overall – This is the UK's first airport DCO application. It is of grave concern that RSP produced 3,900 pages for its latest statutory consultation and yet its application runs to nearly three times that number of pages. In addition, following the close of the statutory consultation, RSP has moved from a 17,100 cargo ATM "worst case" to an 83,000 cargo ATM "worst case" (as well as any additional passenger flights). This is a gross failure to carry out meaningful consultation such that the public had an informed view as to the proposal's possible impact on us and our daily existence. If it is accepted that an airport can be awarded a DCO without the public ever having been consulted on the worst case impact of the proposals, that would set an alarming precedent for the DCO applications waiting in the wings.

Finally, on a point of process, I understand that this is predominantly a written process and that our best opportunity to put before PINS relevant evidence that the applicant has chosen not to submit is in a written submission by 8th February. I am very concerned that this deadline for written representations is very short. **I am extremely grateful for the extra week that the ExA has allowed in what I appreciate is a very tight timetable for the entire process.**

