

Riveroak Strategic Partners (RSP) Application for a Development Consent Order (DCO) to develop a cargo airport in Manston, Kent

Please find attached Appendices 1 - 3

I am hereby registering my objection to the plans of Riveroak Strategic Partners (RSP) to develop a cargo airport in Manston.

Section 1

I would firstly like to articulate my disappointment that the Planning Inspectorate's (PINS) has allowed this project to proceed to the point of acceptance for examination, despite overwhelming evidence of the **project's ineligibility even on the basis of not having fulfilled an adequate Consultation process:**

Inadequacy of the Consultation

The Public had understood that a full and thorough Consultation process was the condition of a Planning Application being accepted for consideration by PINS. As the 3,200-page RSP document upon which we were consulted subsequently increased to over 11,000 pages when submitted, and included significant changes from the original, the Consultation itself was thereby rendered invalid. In addition, PINS had also been made aware that community feedback from the Consultation was incomplete because the choice of venues for, and timings of, events were insufficient to allow a presence for all interested parties; and stakeholders who would be living, working or studying directly under the flightpath or adjacent to the runway itself had been deliberately scoped out. PINS also received evidence that presentations and soundbites deliberately misled the public concerning critical content of its documentation about e.g. night flights, noise quota, employment etc. Feedback received is consequently also an unreliable indicator of local opinion regarding RSP's actual plans (Please see Appendices 1, 2 & 3: Submissions to PINS 19th July 2017, 15th February 2018 & 7th October 2018)

Applying the Acceptance tests to the RSP Application, the Planning Inspectorate had itself noted many omissions/discrepancies:

PINS considered that the Funding Statement lacked proof of adequate funds and assets, and information about its directors, staff, existing and potential investors, accounts, auditors and shareholders. PINS requested further information on the sources and availability of funding for the Noise Mitigation Plan, questioned whether RSP could meet conditions of the Human Rights Act 1998, and wanted further evidence to support declarations that investors will underwrite blight and compensation claims. Indeed, PINS has expressed concern about numerous unsubstantiated statements concerning funding.

PINS detected that RSP omitted from the Environmental Report figures to Inform the Appropriate Assessment, omitted evidence of referenced post-consultation discussions with Natural England and any other statutory body regarding ecological effects, that there remained omissions in ecological survey data, inconsistencies in the relocation of the existing MoD aerial and Manston Museums, the development footprint within the Northern Grass, and in RSP's worst case assessment of ecological effects and mitigation required.

And since PINS's acceptance of its Application for examination, RSP has repeatedly failed to meet a series of imposed deadlines requesting clarification of its finances; whilst the company's revision and fudging of projected number of Air Traffic Movements (ATMs) undermines the reliability of

Assessments upon which it relies in its Environmental Report. Where PINS's reasons for accepting the RSP application remain questionable, we are now looking for it to inform its decision regarding the award of a DCO with thorough and careful reference to rationale, demonstrable facts, expert advice, and local feedback based upon the actual content of RSP's documented plans, rather than those which it has espoused for public digestion.

SECTION 2

Secondly, it is important to underline that RSP is not only applying for Planning Permission but, having failed to acquire the land in question by other means, has sought an ally in PINS by applying for a DCO. This is defined as “a statutory instrument granted by the Secretary of State to authorise the construction and development of a Nationally Significant Infrastructure Project”. It would therefore seem evident that, before passing to an examination of the quality of RSP’s planning, indeed before it had even accepted such a plan for examination, PINS should first consider whether the RSP project fulfils this definition. In other words:

- a) Is there evidence of a need for increased freight activity in the South-east**
- b) Can this be handled elsewhere or is Manston the only, or most appropriate, site to fill this gap?**
- c) Will the project meet basic criteria laid down to become a Nationally Significant Infrastructure?**
- d) Does RSP inspire confidence as being able to successfully to take forward such a Project?**

Failure to meet the criteria of a DCO

- a) **No increased need for Air freight** (Also see Appendices 1 & 2)

In making the case for developing a freight hub, RSP has cited an ongoing increase in air freight, which nevertheless continues to fall short of demand and is currently causing a UK loss of £2bn across the South-East (RSP 2017 Consultation Overview Report.) However, reference to Department for Transport (DfT) reports, The Airports Commission and the Civil Aviation Authority (CAA) websites indicate that total Airfreight has been stagnant since 2003, has in fact been in decline since 2014, and has little prospect of increasing for the foreseeable future. Moreover, as 70% of the small amount of freight transported by air (0.5%) is held in the belly of passenger planes, this looks set to increase as the economic preference by airlines, in line with passenger flights increasing elsewhere. There is excess market capacity for air freighter movements due to the strength of the still growing bellyhold market at Heathrow. In addition, Stansted and East Midlands both provide ample capacity for air freight movements in the short to medium term, by which time the south east market will be catered for by the new third runway at Heathrow.

In their report to Thanet District Council (TDC) in 2016, Avia Solutions accounts for the discrepancy between the reality and RSP’s articulated perception of the freight market with reference to flaws within the research process conducted by Dr Sally Dixon’s Azimuth Associates and reviewed in the Northpoint Report, both on behalf of their employer RSP. Firstly, Azimuth itself admitted that there are significant differences between the freight and passenger markets, and yet based its conclusions upon evidence regarding forecasts for the greater passenger market only. Applying this inflated figure for freight growth to forecast the future for Manston with reference to forecasts on a global scale, Azimuth also conveniently ignored that this indicator is ineffective for the UK, which stands in unique contrast to world trends. AviaSolutions notes that: “To use global trends as the basis of forward projections for the UK market given the historic divergence between the two markets is at best naïve and without the necessary qualification is disingenuous”. Attempting to demonstrate that it was triangulating its research, Azimuth adopted a qualitative methodology based upon a limited sample of 24 interviewees and a selection of freight-related questions designed to support the case for Manston. Moreover, the target audience didn’t include anyone with actual experience of the largest sector of the industry i.e. bellyhold freight. Indeed, ignoring the fundamental differences between bellyhold and dedicated freight, and the industry’s preference for the latter from an economical perspective, Northpoint claims to quote a York Aviation estimate of 55,000 additional dedicated freighter movements in the south east by 2050. However, there is in fact no evidence of this claim in the York Aviation report. AviaSolutions’ own conclusions were devised from triangulated research involving feedback from industry experts, its own knowledge of the sector, and a detailed quantitative analysis of the freight capacity (both bellyhold and dedicated freight) which individual airports would be able to offer.

In summary, there is plenty of reliable evidence easily available to verify that there is already ample, well-placed, capacity to deal with demand for freight currently, and in the foreseeable future.

b) Manston is remotely placed, with poor road links to London (Also see Appendix 1 & 2)

RSP's Northpoint report misquotes the York Aviation report to support its claim of Manston being the "only realistic opportunity" to extend freight. The report instead said that there is currently ample room for freighters at Stansted and that envisaged for Manston (taking air freight currently trucked to/from the UK to/from Europe) was not feasible for UK airports given its island location.

Attempting to make the case for Manston being ideally placed to profit from this invented future scenario of a national inability to meet a fictional increasing freight need, Northpoint offers six international airports as benchmarks for Manston's potential success. However, AviaSolutions points to the inappropriateness of comparing Manston with any of the airports selected. RSP would have us believe that the site enjoys "considerable support among both airlines and freight forwarders" (RSP 2017 Consultation Overview Report page 5), but this wishful thinking is emphatically contradicted by fact. Surrounded on three sides by water, Manston's remote setting has proved the downfall of all previous attempts at its profitable exploitation: not providing enough custom locally to sustain a passenger market and not valued by the freight market when considered against its competitors such as Stansted and East Midlands Airports, which are much more centrally located. During a presentation at the Baptist Church Meeting Herne Bay 16th October 2017, RSP Director Tony Freudmann admitted that Manston's location is poor in terms of its distance from centres of population. In 2013 Manston had only managed to claim a mere 1.29% of airfreight before closure; if offering such an opportunity, why have these previous efforts to break into the market been so convincingly rejected by the industry? RSP points to the fact that "inappropriate strategies" and lack of investment inhibited success in the past (RSP 2017 Consultation Overview Report page 13). Yet failed strategies in the past have included both the freight and passenger services currently foreseen and, as AviaSolutions reminds us "Many of the commercial risks which precipitated the recent air freight decline and subsequent closure of Manston Airport are still in evidence today". History dictates that it would be unwise to assume that business would automatically follow ambition, but RSP appears not to have questioned exactly why cargo operators or freight forwarders might be prepared to take the risk on switching to Manston with its inherent disadvantages, when there are better alternatives elsewhere with availability. ".....the provision of capacity is not the determinant of profitability" (AviaSolutions).

In summary, there is plenty of verifiable evidence easily available to demonstrate that Manston's geographic location has led to its failure as a commercial airport for both passengers and freight in the past; and that this disadvantage will continue to undermine any aviation plans for the future.

c) Unable to meet other basic DCO criteria

To become a Nationally Significant Infrastructure, RSP has needed to claim that it will eventually have at least 10,000 air freight movements, hauling 130,000 tonnes. But this would therefore imply Manston securing 20% of the dedicated freight market from the established successful East Midlands and Stansted airports, who have significant capacity to take more and so will certainly not be prepared to yield existing freight to Manston. Moreover, as freight planes become larger, not only does this suggest less movements but, and contrary to the myth that only Manston has a runway capable of handling outsize freight (RSP 2017 Consultation Overview Report page 6) Stansted already handles outsize freight, and Manston's runway is not actually long enough for a fully laden Boeing 747-400 to take off. The likelihood of RSP being able to secure the necessary 10,000 plus movements within either the 5 years (the RSP 2017 Consultation Overview Report page 5) or even 15 years (a much later target year tucked away on page 12 of the RSP 2017 Consultation Overview Report) is therefore unlikely; but this figure is significantly less than the highly-inflated claim that there will be over 350,000 tonnes on 17,000 flights by 2041 (page 11/12 volume III of Dr Dixon's report). These exaggerated figures seem to have been simply plucked from the air a) to provide an adequate prediction figure to satisfy a DCO application and b) to persuade local

residents that the project would bring with it the employment and local prosperity very much desired here and so encourage positive feedback to the consultation.

Another crucial criterion to meet, even at the stage of Application for a DCO, involves funding. Yet PINS articulated concerns about the obscurity of RSP funds and their sources from the outset, and to date its questions have not been answered. Even if more clarity has finally emerged by 8th February as promised by RSP, this is too late for Public Consultation(see 'Adequacy of Consultation' above); and even the solution RSP had undertaken to finally provide looks set to pose further concerns.

In summary, and before PINS even proceeds to dissect the detail of RSP documentation, it can be seen that RSP has already failed to meet some of the essential basic criteria required for the award of a DCO.

d) As a company, RSP cannot be trusted to successfully take forward the plan

Since Tony Freudmann is the only RSP Director with any significant background in Aviation, his knowledge, experience and expertise are pivotal in both the envisioning of this project, and its potential for success. The fact that Mr Freudmann [REDACTED]

[REDACTED], may stimulate some uneasiness regarding his integrity; but it is Mr Freudmann's history in the world of Aviation which is of greatest relevance in terms of estimating the quality of RSP's project and its likelihood of success. As the frontman for RSP, Freudmann's current bid for a DCO is not his first attempt to develop Manston as an airport, nor has Manston been unique in attracting his interest. Indeed, Manston represents just one of the many old military airports which Mr Freudmann has spent over twenty years either trying to acquire, or acquiring and then failing to develop. In fact, Mr Freudmann's repeated disasters within the world of Aviation would be laughable, but for the devastation left behind them:

1993: A Department of Trade and Industry report found Manston unsuitable for development as a major airport because of its proximity to the town of Ramsgate

1994: Freudmann passed on his idea of buying up old military airports to the property development company Wiggins, who then made him responsible for the strategy of acquiring: "former military bases with ample availability of surrounding land which can be developed using the real estate experience of Wiggins." All the airports acquired by Mr Freudmann on behalf of Wiggins failed, either as a result of breach of contract, voluntary liquidation, non-payment of rent and/or heavy losses.

1999: RAF operations ceased at Manston Airport. Freudmann and Wiggins purchased it and operated some cargo flights. **1999-2002 Wiggins reported losses of £8.6M.** In 2014, Kent County Council (KCC) announced that **"even then, more than 10 years ago, they (Wiggins) also had ambitions for property development on the airport site"**. Had Mr Freudmann's idea been to use old airport sites for property development all along?

2000: With Tony Freudmann as Vice President, Wiggins acquired Odense airport in Denmark in a joint venture (JV) with the local authority, which later ended the JV as **the rent hadn't been paid by Wiggins**. In the same year, Wiggins acquired a 25 year lease for Smyrna Airport, Tennessee, USA, announcing that it would establish the site as its corporate HQ and acquire a further 14 airports. But, in 2003, **Wiggins surrendered the lease for Smyrna.**

2001: Still relying upon vice President Tony Freudmann's advice, Wiggins took a lease from the Czech Ministry of Defence for Pilsen airport and made a deal with BAE Systems to redevelop. Wiggins had metamorphosed into Planestation by the time **Pilsen was sold in 2005**. In the same year, Wiggins acquired 80% of Lahr airport, Germany; **selling Lahr Airport to Babcock & Brown in 2005** when Planestation failed. Wiggins also acquired Schwerin Parchim airport in Northern Germany, with a substantial EU grant to develop it; but the agreement was **terminated in 2005 due to non-payment of rent with financial loss to the EU**. Also in 2001, Wiggins took a 43% stake in Cuneo-Levaldigi airport, Italy; **withdrawing in 2004 with heavy losses to the Italian Government**, which had invested heavily in the venture. In 2001 Wiggins also agreed a deal to build and operate an international airport in Ajman, UAE; **but plans were abandoned in 2003. 2001 was also significant as the year in which The Financial**

Reporting Review Panel criticised Wiggins for five years of over-positive reporting of its financial results, as it had in fact been operating at a significant loss.

2003: Trading in Wiggins shares was suspended to give the company a chance to restabilise.

2003 – 4: Wiggins reported further losses of over £2 million.

2004: Wiggins Group posted losses of £73M , and had to borrow £46M at an interest rate of 28%.

Nevertheless, Wiggins and vice-President Tony Freudmann remained undeterred in their quest to acquire airports. Wiggins took a lease to operate the international side of Melbourne Airport, USA; announcing the site as replacing Smyrna airport in its portfolio. In the same year Wiggins also acquired Borgond Airport, Hungary, in a JV with the local authority. Wiggins then changing its name to Planestation, **the company folded in 2005 before development on either site had taken place.** But not before Tony Freudmann had led Planestation in purchasing EUJet and launching scheduled flights from Manston to 21 destinations in Europe. **The service collapsed in 2005, leaving 5,400 passengers stranded.**

2003 – 4: Wiggins reported further £2M loss over 2003-2004

2004: An expert brought in to rescue Planestation, where Tony Freudmann was now senior vice President, concluded that it would no longer be "an acquirer of assets and a stealer of ideas", with Martin May, a Turnaround Practitioner commenting that "Planestation has been one of the most woeful ventures ever to grace the London Stock Exchange it has generated little in the way of revenues, milked its investor base for all they were worth and produced gargantuan annual losses".

2005: Not surprisingly perhaps, and not before time, Tony Freudmann was "let go" from Planestation in February, but his departure was too late to prevent Planestation from going into administration, and Manston airport from being sold to Infratil in July.

2005 – 2013: Infratil unsuccessfully attempted to develop passenger services at Manston.

2006: Despite the track record of having led both Wiggins and Planestation to their downfall, leaving a trail of financial loss and disappointment for others in their wake, Tony Freudmann somehow managed to persuade the pro-airport Kent County Council (KCC) to invest £289,000 in his plan to run flights between Manston and Virginia. Not a single plane took off, leaving KCC with heavy losses and a bill from Mr Freudmann for almost £176,000 in consultancy fees.

2012 Mr Freudmann could not have been unaware that the company Integral Investments Ltd., was already insolvent, when he turned his attention back to Lahr Airport and made a successful bid on Integral's behalf for acquisition. Local Press soon announced that salaries of airport workers were not being paid and a High Court hearing placed Integral into administration.

2013 Tony Freudmann re-surfaced as chief executive officer of a new company and, undeterred by the financial difficulties he had already inflicted upon Lahr, persisted in another acquisition attempt. But Freudmann's Annax Aviation Services was considered an unsuitable bidder. In the same year Tony Freudmann introduced Ann Gloag to purchase opportunities at the failing airport of Manston.

2014: Over nine years of attempting to achieve ambitious plans for passenger and freight flights at Manston, Infratil had lost between £40 to £50 million, the highest number of passengers was 50,000 (as opposed to the 1,200,000 originally boasted), and the airport employed only 144 people. With losses of over £3 million a year, the company wrote off its purchase price of £17 million and notoriously sold the Manston site Ann Gloag for £1, plus the airport's debts and running costs. Based upon Mr Freudmann's recommendation, Mrs Gloag had intended to maintain and grow the aviation business at Manston. But, with revenue losses of £100,000 per week, plus significant capital losses, within months the airport was closed, with 144 job losses. Tony Freudmann responded promptly with enquiries to Thanet District Council regarding planning to build 1,000 houses on part of the site. At the same time he was fronting a bid by Indigo Planning Ltd. to buy the site from Ann Gloag, but the offer was withdrawn for, apparently, "legal reasons". Tony Freudmann then turned his attention to RiverOak Investment Corporation LLC (ROIC) and made a bid for the airport on its behalf. The ostensible £7m offer for the site was rejected on the basis that Mrs Goag had **"serious concerns from the outset about the way ROIC conducted their business with us.....failed to provide any business plan to back up their claims of future employment or to reassure us that their bid offered commitment to maintain it as an operational**

airport”. ROIC then approached the pro-airport TDC to propose that the latter acquire the Manston site under a Compulsory Purchase Order (CPO), with ROIC indemnifying all costs in exchange for being passed ownership. Having commissioned independent Falcon Consultants Ltd. to undertake a viability study, TDC accepted the findings that the airport was unlikely to succeed and would generate “substantial operating losses”; but nevertheless decided to tender for a suitable indemnity partner, should it decide to press ahead with a CPO. **Only ROIC responded, but failed to convince TDC that it had either the financial resources or the investors to cover the costs.** TDC therefore accepted that Mrs Gloag sell the majority of shares in the Manston site to experienced regeneration experts Stone Hill Park Ltd., with plans to produce a mixed-use development, whilst retaining aircraft museums and capacity for irregular flights of heritage aircraft.

2015: With UKIP having taken over TDC on the basis of re-opening the airport, Tony Freudmann and ROIC saw another opportunity to acquire Manston and again approached TDC proposing a CPO of the Manston site, which it would subsequently indemnify. **Unable to demonstrate either the existence of current funds, or investors prepared to commit to Manston’s future, it was decided that ROIC would not be an appropriate company in which to entrust the project.**

2016: TDC commissioned AviaSolutions to conduct a viability study of an airport at Manston, which reaffirmed that “airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the period to 2031”.

2017: RiverOak Strategic Partners (RSP) appeared as a shell company, with Director Tony Freudmann as the Aviation ‘expert’ in his third attempt to acquire Manston. This time his idea was to exploit the power of the DCO from its original purpose of supporting public development, by redirecting its use for the financial benefit of a private company. Although, as with so many other previous companies represented by Freudmann, the interests of RSP Directors would seem to lie in Real Estate, the company’s alleged objective is to create a major freight airport at Manston. But, even without any consideration of the demonstrated failure of RSP to meet the necessary criteria to achieve a DCO, with Tony Freudmann fronting the deal, would RSP really be the company of choice to develop Manston at this point? Indeed, considering Mr Freudmann’s convincingly failed history in Aviation, would any reputable company wish to be seen as associating with him? There is some further insight gleaned into the integrity of other RSP main protagonists with reference to Appendices 1 & 2: which offer contributions of RSP Directors Niall Lawlor and George Yerrall, and consider the appropriateness of Tony Freudmann selecting Dr Sally Dixon as Consultant for the DCO when, as his partner in previous projects, her own experience in Aviation has mirrored that of his own. Ignoring the weight of expert advice and the repetitive history of the Manston site, and instead favouring inflated claims with no sense of reality, espoused by two so-called experts equally lacking credibility, Tony Freudmann and his company RSP should receive an unconditional rebuttal of any projects with which it seeks to be involved.

SUMMARY

This document repeats my extreme disappointment with PINS having accepted for examination the RSP Project for Manston, when the company had demonstrably failed to meet the requirements of the Consultation process on two separate occasions. It argues that the plans of RSP further fail to meet the criteria required for a Nationally Significant Infrastructure, and that therefore the response of PINS’s examination should be a firm rejection of the project. I do not proceed to analyse the contents of RSP documentation in detail in order to exemplify areas of invention, exaggeration, or blatant distortion of proven facts; all of which adds valid weight to the argument for rejection, and which I have included in previous submissions (See Appendix 1 & 2). Instead, I contend that RSP not only failed at the first hurdle of Consultation, but is equally unable to establish that it meets the most basic criteria to gain a DCO. However RSP attempts to fashion its documentation, there is no disproving the facts: there is no requirement for more air cargo, Manston is ill-placed to attract clients, RSP’s claims to meet DCO criteria in terms of the amount of ATMs expected and the funding for the project are unsubstantiated and, disregarding all else, RSP does not inspire trust or confidence.

In conclusion, I repeat the feelings I expressed to PINS in my last submission (See Appendix 3):

The work the argument of PINS and the Secretary of State should be transparent and accountable to the public whom they serve. Decisions should not be made on a personal whim, or in yielding to pressure from MPs whose loyalty should be to constituents rather than to friends running a private company for profit. In accepting the RSP application for examination, however, PINS is seen to be overlooking the flawed consultation process and the significant weaknesses, uncertainties, contradictions and omissions in the application. In examination, therefore, we cannot help but fear that PINS will likewise disregard the overwhelming weight of factual and expert evidence signalling the negative environmental and health impact of the conceived airport hub upon this area, as well as the absence of need for, and potential failure of, this project. A valuable brown field site, ideal for the mixed development planned by its owners, lays idle; whilst around it the equally valuable Grade 1 Agricultural land of Thanet is being earmarked for housing without any infrastructure. We appeal to PINS not to extend local misery here by blighting us, and our many regular tourists, with yet another period of uncertainty and collapse, as a private company once again tries to exploit Manston to the detriment of Thanet residents, our economy and health; only for RSP to then achieve what many of us believe to be their real long-term lucrative objective of building houses on the site anyway.

Karen Roper, Minster, Ramsgate
February 2019

Adequacy of the RSP Consultation Process

Compelled to conduct the consultation process as a condition of preparing the Development Consent Order (DCO) bid in accordance with Section 42 (Duty to Consult) and Section 44 of the Planning Act 2008 (PA 2008), and The Land Compensation Act 1973, River Oak Strategic Partners (RSP) had a duty to consult with everyone who might be concerned should its plans go ahead and who could therefore be eligible for compensation due to: “noise, vibration, smell, fumes, smoke and artificial lighting.....”

The Alliance of Residents Concerning O’Hare inc (ARCO) reported that the area heavily contaminated by a single runway equipped airport with light to medium traffic is about 6 miles around the field and 20 miles downwind (12th October 2011). As RSP foresees heavy traffic in the long-run, the area contaminated around the runway could extend to the 12 miles cited as being contaminated for a moderate 2 runway airport (ARCO). We therefore suggest that between 6 and 12 miles around the field, and twenty miles downwind, should have been RSP’s criteria for selecting those to participate in the consultation process; with the emphasis being placed upon views of those who would be placed immediately under the flight path or close to the runway.

We contend that not only has RSP deliberately failed to comply with Planning legislation with a view to averting objections, but has moreover blatantly harnessed support from local MPs (and from pro Manston groups) to aggressively quash dissension, and exploited for propaganda forums advertised as offering question and answer sessions. We further maintain that the intrinsic information provided by RSP, and upon which the consultation depended, was vague, exaggerated, contradictory, misleading and incomplete. Also taking into account the previous track record of the main RSP protagonists, and mystery concerning the origins of financial resources, we move that the RSP Consultation process was flawed.

1. Scope of Consultation

RSP was initially required to compensate for inadequacies during what Thanet District Council (TDC) considered to be a “flawed” pre-application consultation process: i.e. this time round to contact all local residents situated under the flight path and within a three kilometres radius of the airfield, and to conduct the process over an 8 week period (Chris Wells, UKIP Leader of TDC, writing in The Thanet Gazette at the start of the Consultation period.) Instead, reducing the radius of consultation to two kilometres, and limiting it to a six-week period, RSP has diminished scope for consultation to include the bare minimum it hoped to possibly get away with. It has also been selective in a combination of the targeted audience, the mechanism of presentation, information imparted and dialogue thus facilitated.

2. RSP 2017 Consultation Overview Report

A copy of the RSP 2017 Consultation Overview Report was forwarded in mid-June only to residents within this self-determined two kilometre radius, or to those who had previously registered an interest, with a requirement that comments be returned by the end of July. When we asked Director Tony Freudmann why everyone under the flight path had not been leafleted, he replied “We’re not allowed”; but offered no qualification as to exactly who he claimed to be preventing RSP from disseminating information.

A Reference copy was also available within local libraries, although residents would not have known to seek out information there, and certainly wouldn't have thought to look for any if they had been unaware of the fact that a consultation process was taking place. Moreover, and although some libraries were displaying the Save Manston material in addition to the RSP Consultation documents, leaflets offering alternative information by No Night Flights (NNF) were refused by library staff; who were under the impression that the former displayed 'facts', as opposed to the latter's 'opinion'.

Having witnessed three failed attempts in recent years to transform the Manston Airfield into a profitable airport, well aware of Stone Hill Parks's successful purchase of the site and plans for redevelopment, and of the removal of all equipment appertaining to an airport site, most Thanet residents have remained unaware of RSP's latest manoeuvres towards a take-over. One of the usual responses to the subject being introduced is therefore "But I thought the airport was all over and done with". A six week window to raise awareness amongst neighbours and interested parties has therefore provided insufficient time for those of us who have continued to follow the course of events and are concerned that others understand their obvious implications.

In addition, we do not have confidence in RSP representing faithfully any negative views that they receive. When the pre-consultation took place in 2016, not only were most of us unaware of its occurrence, but certain responses seem to have mysteriously 'disappeared': many of those who forwarded negative replies to the pre-consultation were told that their responses simply hadn't been received. Perhaps this would account for the 'unusual', or even 'unique' result reported on Page 15 of the RSP 2017 Consultation Overview Report: which records 800 responses, of which 90% were positive. Considering that around 90,000 people would be directly affected by the negative aspects of this envisaged airport, taking into account Ramsgate, Minster, Herne Bay and surrounding villages, plus villages and countryside which would potentially be under the flight path to the South of Manston, this small number of responses testifies to the little publicity attached to the previous Mrs Gloag decided to sell the airport to provide for the locally targeted need of a range of businesses, housing, shops, schools and community facilities. consultation. However, TDC's refusal to join RSP in a Compulsory Purchase Order of the Manston Site, Kent County Council's lack of support for RSP, the critical statement recently produced by the Ramsgate Society, plus activity on Facebook sites such as "NNF", "Manston Pickle", "No DCO for Manston" and the local Green Party, demonstrate that there exists a great deal of articulated opposition to the plans and therefore raises the question as to why this had not been reflected in the previous result claimed by RSP. Yet in addition to those who have already expressed opposition, the majority of people whose lives will be adversely changed if the airport goes ahead, those who did not personally receive information, do not read local papers or pick up the free versions available in some outlets, and do not have access to information technology, still remain totally unaware of proposals and were thus prevented from responding to the consultation.

3. Consultation Events

Rather than leafleting all those involved as requested by TDC, RSP relied upon the RSP 2017 Consultation Overview Report (received only by those having already registered an interest or in a 2 kilometre radius of the airfield) to publicise Consultation events in seven locations. Although directly under the flight path, residents of Herne Bay would only have discovered that their town's exhibition was to take place on the day of the event itself, and only if they happened to pick up a free paper

from one of a handful of outlets. Although 6 hour slots were offered in sites such as Canterbury, situated about 20 kms from the airfield, only a 4 hour window was allocated to the 42,000 residents of Ramsgate who would be living directly under the flight path. Moreover, rather than choose a central venue to attract attention, the exhibition in Ramsgate, as elsewhere, took place in an outskirt location served by an irregular bus service (with even SMAA supporters being critical of accessibility). Villages surrounding Manston received no information whatsoever. A large majority of stakeholders therefore remain ignorant not only about the detail, but even the very existence of a proposal to install a busy freight hub on their doorstep; whilst those who did attend and wished to engage in conversation with an RSP representative, were often compelled to fight a path through the surrounding large numbers of pro Manston supporters present. Some who did persist to express concerns about how the project would disadvantage its neighbours were given short shrift: "I feel sorry for you" was Mr Freudmann's reaction to our expressed concerns, as he shrugged and walked away.

4. Consultation Meetings

Incongruously, since the planned airport is mostly situated within the Parish of Minster, no consultation event whatsoever had been scheduled for the area until Minster Parish Council expressed its disappointment (Minster Matters July page 17). Well into the consultation period therefore, and at short notice via a letter of invitation to residents, further events were suddenly scheduled in both Minster and nearby Acol: billed as consisting of a presentation and questions and answer sessions. Outside the stated 2 km radius, and about 10kms from the flight path, Birchington was not the most obvious location for a third of these meetings in comparison with neglected sites such as Ramsgate and Herne Bay, both on the flight path and with large populations. Moreover, the choice of locations for further meetings suddenly scheduled in Chislet and Westgate was incomprehensible, since neither is under the flight path: the former very tiny village is situated 10 kms from the runway and the latter seaside town at a distance of some 4 kms.

In addition to the fact that these meetings were seemingly being organised at the last minute, we also question who the targeted audience was. In the Thanet Gazette 30.6.17, Mr Wells relays the contents of a SMAA email to members: "We know the antis, NNE, Pickles etc., will be turning out in force – can we ask you all to try to get there on Saturday please?" (i.e. the Ramsgate event). "Turn up, sign in, listen and make at least a brief response on the Ramsgate feedback sheets, even if you are to do a more detailed response on the web". The similar age profile of the audience at the separate events, and identical comments expressed at each meeting, would suggest that the same group of Manston supporters moved around each venue, and it would certainly have been interesting to have had the opportunity to compare the signing-in lists of those present on each occasion to identify any repetition. Mr Wells also notes the boasting of multiple attendances of SMAA members on Facebook: "My third and final visit this year will be at The Comfort Inn, Ramsgate", (posted prior to the announcement of meetings offering yet more opportunity); "My final visit is being reserved for Minster..."; & going again this afternoon"; "One more consultation event and three presentations to go".

A clue as to the profile of SMA members is given by two petitions submitted to TDC on 10th July 2014 by SMAA: the e-petition was organised by a student in Holland and apparently signed by 3,361 people, whilst there were 4,330 signatures on a paper petition. Pleas for the two were identical, and

Manston Pickle discovered that a Freedom of Information Act request revealed that neither petition was checked for duplicate signatures and, with no full name or address, neither could it be checked that the signatures belonged to real people. We understand that SMAA's Facebook page reveals that some people did sign the petition more than once and that a surprisingly large number of signatories live a long way from Thanet, Kent, or even England. Similar petitions have previously been put together in a bid to develop an airport on the site. Manston Pickle found that one petitioner boasted at having worked his way around Kent, telling people that, if they sign the petition to reopen the airport, 6,500 jobs would be created and a "massive, overspill housing estate" of 60,000 houses, filled with "out-of-towners" be avoided. Clearly, people signed the petition because of concerns that otherwise a "sink estate" will be built on the Manston site. This type of scare-mongering propaganda, frequently enunciated by North Thanet MP Roger Gale, is currently fuelling the completion of yet another petition by SMAA, as their instigators move around local summer events to collect signatures. As in the case of these petitions gathered by SMAA, multiple attendance comments, and providing feedback both on line and in paper version as suggested by SMAA above, undermine the reliability of the RSP consultation process. And, of course, the provenance of these participants raises further questions regarding the validity of responses. In another Thanet Gazette article, Mr Wells clarifies that the SMAA acknowledges of its members that they are mainly "out-of-area residents" called "to pack the meetings with supporters." The fact that 'Why Not Manston?' holds its meetings in Margate suggests that the nucleus of members is not focused in areas to be most affected by the emergence of a freight hub on their doorstep. Indeed, we understand that when Trevor Shonk (UKIP Mayor of Ramsgate, in favour of the airport) once dared to take the stage in Ramsgate for a general meeting regarding Manston, he was hissed and booed by participants.

At the Chislet meeting it was apparently expressed that the concerns of Ramsgate residents were perceived as central to the debate by RSP; so again calling in to question its reasons for avoiding to leaflet the area, or to hold a public meeting in the town. But Mr Freudmann and Mr Gale both made time to jointly attend the "Why Not Manston" self-congratulatory AGM on 15th July in Margate, where potential participants were carefully filtered to avoid any dissension; and Mr Freudmann rounded off his anticipated victory by attending a SMAA barbecue on 23rd July. Meanwhile Craig MacKinlay, MP for South Thanet, has conducted his own survey; based on responses to 5 loaded questions and undertaken by means of writing directly to interviewees as well as by his Facebook page. Since Mr MacKinlay's bias is revealed by the intrinsic content of the survey itself, and the omission of an explanation in terms of his selection criteria for those receiving the letter, his claimed result cannot be depended upon. As MPs for Thanet, and regardless of their personal opinion, we believe that Mr Gale and Mr MacKinlay should objectively consider the facts presented, represent the perspective of all their constituents and, above all, put the health and well-being of these same constituents above any personal prejudice. We therefore consider it inappropriate that both have so actively and visibly sought to ally themselves with executives of RSP and their support group SMAA, so giving weight to Mr Wells' comment in the Thanet Gazette that Ramsgate and its prominent flight path position had been treated "shabbily". Whilst local residents had been side-lined, SMAA supporters from a wide catchment area were invited and encouraged to respond positively, and on multiple occasions, to the consultation process in order to boost the perception that the community supports the opening of Manston airport.

3. Information presented as a basis for consultation responses

At the Minster meeting the signing-in process delayed the start of the meeting by 30 minutes, and the evident presence of so many SMAA members meant that around 20 would-be participants were apparently turned away. Since we received reports from other meetings where queues were so long that potential attendees were finally giving trying to attend, the size and number of venues, in addition to their location, were manifestly inadequate. The Minster meeting finally began with Tony Freudmann setting out his store at a leisurely pace, and it was then announced that questions would follow further presentations by Dr Sally Dixon and Howard Gardner. This allowed only around 20 minutes for questions and Mr Freudmann's firm grasp on the microphone throughout left participants in no doubt as to his intention to tightly orchestrate and control the session. Between information relayed in this and subsequent meetings, and that offered in the RSP 2017 Consultation Overview Report, there emerged a picture of vague, exaggerated, contradictory, incomplete, misleading or even misinformation – all presented as fact and a basis for extracting feedback to the consultation:

- In making the case for developing a **freight hub**, the ongoing increase in air freight was emphasised, with the claim that it cannot be catered for elsewhere. Pages 7 and 43 of the RSP 2017 Consultation Overview Report attempts to add weight to this conjecture with reference to a further guess that post-Brexit will provoke increased air freight. However, it is public knowledge that the future post-Brexit is unpredictable. Moreover, reference to Department for Transport (DfT) reports, The Airports Commission and the Civil Aviation Authority (CAA) website indicates that, despite DfT predictions in 2003 as to the contrary, total Airfreight has been stagnant since, has in fact been in decline since 2014, and has little prospect of increasing for the foreseeable future. Moreover, as 70% of the small amount of freight transported by air (0.5%) is held in the belly of passenger planes, this looks set to increase as passenger flights increase elsewhere. To be able to apply for a DCO, RSP has needed to claim that it will eventually have at least 10,000 air freight movements, hauling 130,000 tonnes. But this would therefore imply Manston securing 20% of the dedicated freight market from the established successful East Midlands and Stansted airports, who have significant capacity to take more and so will certainly not be prepared to yield existing freight to Manston. Moreover, as freight planes become larger, not only does this suggest less movements but, and contrary to the claim that only Manston has a runway capable of handling outsize freight (RSP 2017 Consultation Overview Report page 6) Stansted already handles outsize freight, and Manston's runway is not actually long enough for a heavily laden Boeing 747-400 to take off. The likelihood of RSP being able to secure the necessary 10,000 plus movements within either the 5 years (the RSP 2017 Consultation Overview Report page 5) or even 15 years (a much later target year tucked away on page 12 of the RSP 2017 Consultation Overview Report) is therefore unlikely; but this figure is significantly less than the highly-inflated claim that there will be over 350,000 tonnes on 17,000 flights by 2041 (page 11/12 volume III of Dr Dixon's report). In fact, despite RSP alleging that there has been an urgent need for more freight handling by air, and that Manston is set to secure a substantial slice of this market, in 2013 it had only managed to claim a mere 1.29% of airfreight; which begs the question as to why this freight had not been previously available to Manston and why RSP, particularly led by the same previously failed manager, should succeed so much more significantly now? These exaggerated figures seem to have been simply plucked from the air a) to provide the correct figure to secure a DCO and b) to persuade local residents that the project would bring with it the employment and local prosperity very much desired here and so encourage positive feedback to the consultation.

- Shifting the focus from freight to introduce the plan for cheap and local **passenger flights**, Mr Freudmann claimed that he was in positive talks with Norwegian Air, KLM, Ryanair and the port of Dover. We have discovered that there had as yet been no contact with Dover at the time of this assertion however; neither is it likely that the port would extend its current limited number of cruises as a result of a nearer airport, since flying to London would continue to remain a more attractive part of the package for foreign participants in terms of linking with Cruise ships. All three air companies also denied any contact, with the latter never having heard of RSP. A presentation to TDC, Canterbury and Dover Councils did not take place until after the consultation period; so that Dover and district residents, who could well be adversely affected by flights out of Manston, would have been in ignorance of any plan to re-open the airport until the headline appeared in the Deal Mercury 2.8.17 "Airport owners say plan for Airport hub is doomed to fail". When the 'suggested' flight paths began to emerge at some point throughout the consultation period, departures to the west would have been of particular interest to those living in the villages and countryside south of Manston. But they were offered no information in time to feedback on the consultation to RSP, and most will continue to be unaware of the threat.

There have already been three serious attempts to develop passenger services from Manston which, although verbally supported by residents in general, were unable to attract adequate passengers because of Manston's isolated position. Despite heralding a new age of flight from Manston, KLM was forced to withdraw in April 2014 having sold only 44.4% of seats available for the year and, despite Infratil's boast in 2008 of 1,200,000 passengers, by 2010 it closed with a loss of £10,000 per day. Mr Freudmann is aware first-hand of the challenge since, responsible for airport acquisition strategy at Wiggins, he was a Director at Manston when its owner went into administration. He had also previously failed in trying to establish a new route from Manston to Norfolk, Virginia, and thereby lost the public investment he had secured. Moreover, additional costs involved in handling passengers, in terms of ever-increasing security and other peripheral services, in reality renders passenger flights more of a nuisance, less profitable, and consequently less attractive and unlikely to be maintained by the airport. Nevertheless, local residents were flagrantly wooed into providing a positive feedback by the fantasy figure of 10,000 flights and 1,400,000 passengers by 2041.

- It is in the area of **night flights**, which has obviously been anticipated as a controversial area, that RSP's contradictory double-talk is most in evidence in its attempt to gain support from residents. Commenting in the Thanet Gazette at the beginning of the Consultation process, RSP director Chris Yerrall fully admits that: "..... we recognise that night flights might be unavoidable". Moreover, in claiming that the airport would be capable of operating 24 hours a day (RSP 2017 Consultation Overview Report page 21), and assuring that Manston will function in accordance with air freight operations at other similar airports, (RSP 2017 Consultation Overview Pages 21 and 42) RSP is emphatically setting out its case to gain maximum profit from the airport hub by operating 24/7. Indeed, RSP will be aware that this is the only profitable way to run a freight airport and, as it sets out above, will therefore model itself on the current level of night flights between 32% (Stansted) and 58% (East Midlands). In fact we could expect between 12 to 20 flights on average a night, if Manston were to indeed achieve its stated aim of 10,000 to 17,000 cargo flights a year to qualify for the DCO. This conclusion is corroborated by the fact that in order to transport inbound perishable goods, as referred to on page 6 of the RSP 2017 Consultation Overview Report document, there will be an urgent need to transport at night, ready to reach outlets by the beginning of the following day.

Based upon RSP's own stated intentions then, Mr Wells concludes his article in The Thanet Gazette: "To re-iterate. It would seem that a third of all planned flights under the RiverOak Scheme could be at night".

But Mr Freudmann is only too aware of public opinion regarding the night flight issue at Manston, since he will know that TDC conducted a survey when Infratil previously wanted to open night-time flying at Manston and 73% voted against. On a second application from Infratil, TDC commissioned independent experts to look at the potential impact and they calculated that a 747 taking off at night over Ramsgate would create a noise footprint that would affect 30,000 people. Therefore, and despite having openly planned for up to 8 flights a night (plus passenger flights) in the RSP 2017 Consultation Overview Report page 21, this message was flagrantly dismissed during the meetings. Here it was claimed that night flights were only included in the consultation at the request of the Planning Inspectorate (which the Inspectorate itself subsequently denied) and that there is no real intention of operating at night. Mr Gale has insisted on several occasions that there will be no night flights: "...I for one would not countenance, and would not expect the Conservative Group on Thanet District Council to support, any proposal that involved scheduled night flying." (Post on Roger Gale Facebook page, dated August 9 2016). Indeed, recruited to support RSP in its presentation to the 80 or so people present at the Chislet meeting, Mr Gale described night flight claims as "bunkem", whilst RSP complained that opposition to the airport was "fixated" upon night flights and sought to gain the confidence of participants by falsely stating that other airfreight operations are conducted mainly during the daytime (RSP 2017 Consultation Overview Report page 21).

Mr Freudmann further hoped to reassure by speaking of reincarnating the previous 106 Agreement as a safety-net for residents. But as a Director for Wiggins at Manston, Mr Freudmann knows only too well that the Agreement represented no such protection in reality, and he will remember the steady stream of complaints from Ramsgate, Herne Bay, and villages surrounding the airport, as the 106 Agreement was brazenly and regularly flouted. The attempt to conceal the spectre of night flights within the consultation information demonstrates that RSP has sought to persuade the public to offer a positive feedback on the basis that night flights will not be an issue, whilst in fact it has blatantly stated the opposite

- Declaring that Manston is a **central UK location** with fast motorway access to all parts of the UK, Mr Freudmann chose to ignore the obvious fact that Manston lies at the very tip of the country, whilst Heathrow, Gatwick, East Midlands and Stansted airports are all better placed to manage freight economically. Moreover, he also overlooked the reality of two-lane dual carriageways and the continually clogged two-lane M2 being Manston's main link to the M25 and thereby access to the main distribution centres. This journey takes an average of 60 minutes by car on a clear road, but would take considerably longer for a loaded HGV on these usually very crowded and frequently jammed roads, where no feasible alternative is available.

Significantly, the implications of heavy HGV traffic for residents surrounding Manston, in addition to those of frequent air movements, was given scant attention until posed as a question regarding the fact that airline fuel will have to be delivered by road. RSP 2017 Consultation Overview Report page 42 reveals plans for 64,906 HGV movements by year 20 to transport freight, but makes no reference to the number of additional movements which will be occasioned by fuel tankers using the roads to the airport. Mr Freudmann could not provide an overall total, so that it was not possible for

participants to respond to implications for noise, congestion and pollution by road traffic as part of this consultation. Neither was there any detail of safety measures to be put in place to protect the residential properties close to the fuel farm from a potential fuel-related incident, or any information regarding security measures to be put in place to avoid the airport and fuel farm becoming 'soft-targets for terrorists.

- The detailed contents contained in the hefty boxes of paperwork available in libraries and at the consultation events became no more accessible to the lay person when Ms. Dixon presented the **socio-economic** angle in a frenetic and confusing stream of facts and figures, supported by the projection of a dense chart which was illegible even to those on the front row (This may, or may not be, replicated on the USB pen provided. However, feedback that the storage device had resulted in a virus attack, or of problems accessing all the information on the website, has discouraged others from examining it.) Nevertheless, we are informed by those who had valiantly attacked these boxes that material relies upon unpublished Academic research papers, which are not easily available and even so would require a fee. As such, we can only take away from this experience the broad claims which, bereft of any convincing evidence having been presented, seem hardly credible. Neither does the fact that Ms Dixon was also selected as the assessor of market potential for the (failed) Freudmann/Wiggins Manston project in 2000/2001 inspire confidence either in her objectivity, or in the accuracy of her crystal ball gazing this time around.

The RSP 2017 Consultation Overview Report page 3 sets out to claim that the airport will create 30,000 jobs in East Kent by year 20, whilst tucked away on page 8 (and as an addendum on the RSP website), is the admission that 26,000 of these jobs will actually be in the "wider regional economy". This detail is further muddled way back on page 42 by the omission of the significant "regional" to simply leave "the wider economy"; which could in fact mean anywhere in the world. From this 30,000 figure, this leaves 4,000 jobs claimed to be actually created on the airport site.

When previously in operation under EUJet, FlyBe and KLM, and having equally promised the creation of much greater employment, the maximum number of people employed by the airport at any one time amounted to only 720 in low-paid, part-time jobs. Indeed, RSP 2017 Consultation Overview Report page 8 includes in its figures "additional jobs created by airlines, freight forwarders and integrators"; but the travel agent, bar, restaurant and shopping outlet roles cited would be largely unskilled labour, and customs and immigration are hardly the executive roles demanded by one participant at the meeting. Nevertheless, Ms Dixon assured that engineering expertise would be required, that training would be given in conjunction with local educational providers (a meeting with Thanet College had not taken place when this assertion was given), and that local expertise would be exploited wherever possible. But she could not specify exactly how many unskilled manual, and how many executive, or even skilled, positions would be available on the airport site. We have learned of the aviation industry's reputation for overestimating job forecasts, and we may well read into this figure the presumption of regularly-scheduled night flights which Mr Freudmann attempts to deny. Yet, and considering that ever more sophisticated technology is minimising the need for a human workforce, the estimated figure for employment appears significantly inflated.

Moreover, whilst the RSP 2017 Consultation Overview Report page 38 acknowledges that 3,800 people across Thanet are currently involved in the tourist industry, it fails to acknowledge that the presence of an airfreight hub will discourage the growing rejuvenation of tourism in Thanet, which

has been stimulated by the Turner Gallery, revival of Margate Old Town, Dreamland, Clean Beach reports around the Thanet coast and, this year, Broadstairs heralded as the most popular seaside destination in Britain. The continual disturbance of aircraft movement 24/7, plus increased freight traffic and oil tankers on the roads adding to current blockages to and from Thanet on fine days, will rule out Thanet as the relaxing destination of choice and destroy tourism in the area. Therefore, even accepting the exaggerated job figures promoted by RSP, and applying a minimum of conjecture ourselves in assuming that at least 200 more jobs would be created by the burgeoning tourism within the area, we could conclude that the 4,000 jobs provided on the airport site would be cancelled out by the loss of a similar number within tourism; so adding no extra employment in fact. The RSP 2017 Consultation Overview Report page 9 briefly mentions tourism as a source of increased income for Thanet as a result of the airport, whereas the term 'cargo hub' itself signifies that the Manston site would provoke only movement in and out of the area, by air and road. In referring to "significant positive impacts on local businesses" (RSP 2017 Consultation Overview Report page 39) RSP shamefully exploits the vulnerability of an audience inhabiting a region renowned for lack of employment, with a view to provoking a positive reaction to its proposals. But it conceals the economic disadvantages to existing businesses involved in local tourism, or to local industry relying upon ease of transport in and out of Thanet.

- In terms of **the environment**, Howard Garner referred to the RSP 2017 Consultation Overview Report pages 24 and 36 in stating that, in all cases, the main source of pollution, noise and vibration around the airfield is road transport; at the same time neglecting to add that freight lorries and fuel tankers will significantly add to this level of pollution should Manston resume operation as a freight hub. He also avoided any reference to the fact that 10,000 flights per year would introduce more contaminants to the area. The Department for Food and Rural Affairs (DEFRA) calculated air freight emissions as 10x more potent than those of road transport. Yet in the Minster meeting Mr Gardner waived aside concerns expressed regarding contamination from aircraft, assuring that this is insignificant from particles expelled by the smaller and more modern planes which they planned to use. In the later Chislet meeting, however, it was stated that the freight planes to be used would not be smaller planes in fact, but old Boeing 747s converted from passenger aircraft which, as older vehicles, necessarily imply a good deal of noise and pollutant contamination. There is therefore clear contradiction between the information imparted in these two meetings.

Nowhere has RSP given any hint of emerging evidence regarding potential health hazards to those living near to airports, in terms of increased risks of stroke, heart disease, lung cancer, chronic and acute respiratory diseases, pregnancy complications, infant mortality. Neither does RSP acknowledge The World Health Organisation's assessment of the onset of significant community annoyance occurring at 50 – 55 decibels during the day and 40 at night. In 2010 TDC had noise contour maps produced to cover the 4,500 homes and 3 schools in Ramsgate within the 1 in 10,000 risk contour of the airfield, where aircraft would be flying over at 600ft or less before landing (DfT Circular 1/2010). RSP has neglected to conduct such a Public Safety Zone Risk Assessment for this 24/7 hub airport conceived; the conclusion of which would surely need to be relocation for those identified as being within the hazardous area. And, indeed, RSP 2017 Consultation Overview Report page 36 drastically underestimates areas which will be significantly disturbed, neither does it take account of the many precious, heritage properties situated in the area (RSP 2017 Consultation Overview Report page 30), for which insulation is unsuitable. Our period home is situated 500

metres south of the runway, and we chose to live in this rural area 25 years ago as we simply don't tolerate noise of any sort. We would find ourselves in a position of it being impossible to sell our home, yet we would be unable to continue living here. Would the RSP response continue to simply be "I feel sorry for you?" or would it be prepared to purchase our home at the market price, plus 25% as we understand to be best practice in this situation? At best, important omissions regarding compensation may be regarded as incompetence by a team which has a poor track record in the aviation industry (it seems that Mr Freudmann's failed efforts in this area are not restricted to Manston or even the UK) or they could signal a deliberate intention to mask the truth when a positive response from the public is sought at this vital stage of the consultation process.

CONCLUSION

- As the short Consultation period allocated has now ended, we continue to meet acquaintances and friends from Ramsgate, Minster and the surrounding villages, who would be significantly affected by RSP's plans, but who have received no RSP documentation, attended no exhibitions or meetings, and are barely aware of a Consultation having taken place. By rumour, some have picked up the two key benefits of jobs to be created and the opportunity for cheap passenger flights; and on this basis surmise that "it might be good to have the airport back". They have not been informed that the emphasis will actually be placed upon creating a massive airfreight hub, the potential of over 40% of the projected 17,000 freight movements being night flights, and of the consequent implications for health and well-being for local residents. Apart from EUJet's daily early morning flights and its occasional flouting of the 106 Agreement, and the odour of unburnt aviation fuel on occasion reaching nearby homes from ancient Russian cargo planes, we Thanet residents have generally held a sentimental attachment to the airfield and the unusual arrival of certain notorious aircraft which would attract crowds of plane spotters. RSP propose something very different to that of which we reminisce, yet unashamedly and cynically capitalises upon this remaining nostalgia (RSP 2017 Consultation Overview Report pages 10 and 11), whilst being fully aware that, should this plan to develop an enormous airport hub come to fruition, the experience for those living in its vicinity will bear no resemblance to any era previously in Manston's history.
- RSP has limited the scope of residents to be involved in the process, and been selective in venues chosen for presentations, with the result that these have not been held in central locations of the areas which would be blighted. Although we understand that it is not an official part of the Consultation process, a range of meetings was belatedly announced and held, wherein the single microphone remained firmly in the hands of RSP, which successfully curtailed what was already little opportunity for questions from dissenters. In addition, airport supporters were encouraged to attend these events in sequence, and en masse, to contribute to the events being used as a vehicle for propaganda.
- RSP has a responsibility to state facts and not peddle untruths. Yet, fully aware that a freight hub will only be successful with a full complement of night flights, RSP sought to cover up the part played by night-flights in their plans.
- It also deliberately exaggerates overall statistics for employment, and its interest in passenger flights, to attract support.
- There is a distinct lack of any mention whatsoever of the potential risks of health and well-being for those living near the airport in order to inform opinion.

- We do not have RSP resources, there is no available forum, and too little time within the six-week consultation period for concerned residents to have conducted an independent SWOT exercise to raise awareness of facts amongst those who do not have access to information technology or regularly read local papers.
- **We submit that, given the degree to which RSP has flouted the consultation process, that the results are neither reliable nor valid and, as such, cannot form evidence to justify planning permission being granted. On the basis of lack of adequacy in the consultation process therefore, we respectfully request that the Planning Inspectorate refuse to accept the Proposal for a DCO about to be placed in its hands by RSP.**

Karen Roper, Minster, Ramsgate

July 2017

Comments re: Adequacy of the RSP 2018 Consultation Process to develop a cargo airport in Manston ('the Project')

Following my husband's and my joint submission to PINS on 19th July 2017, outlining our views regarding the adequacy of the consultation process between 12th June and 23rd July 2017 ('the 2017 consultation'), we note many of our sentiments reflected in the Inspectorate's published review of RSP draft documents on 2nd November 2017. Having contended that RSP failed to comply with Planning legislation during the 2017 consultation process, and despite RSP ostensibly holding a second consultation between 12th January and 16th February 2018 ('the 2018 consultation') with a view to responding to Inspectorate guidance, we maintain that the exercise has yet again amounted to a sham.

A copy of this document will be forwarded to RSP as feedback to the 2018 consultation and, as previously, to Thanet District Council (TDC).

1. Scope of Consultation

TDC considered the RSP pre-application consultation process in 2016 to be "flawed", advised that the 2017 consultation should scope in all receptors situated under the flight path and within a three kilometres radius of the airfield, and to conduct the process over an 8 week period (Chris Wells, UKIP Leader of TDC, writing in The Thanet Gazette at the start of the 2017 Consultation period.) Instead, reducing the radius of consultation to two kilometres, and limiting it to a six-week period, RSP diminished scope for consultation to include the bare minimum it hoped to possibly get away with. It was selective in a combination of the targeted audience, the mechanism of presentation, information imparted, and dialogue thus facilitated. Despite Inspectorate feedback then urging rectification of these persistent inadequacies, the 2018 consultation was limited to a short period of just over four weeks and we have again been made aware of the scoping-out of many human receptors who would be adversely influenced by the Project. Continuing to be excluded were most residents of the Nethercourt Estate situated immediately next to the Eastern end of the potential runway planned; despite RSP's false claims to have leafleted every home in both the 2017 and 2018 consultations.

2. Consultation Events

Advised by the Inspectorate that previous consultation events had been too short and insufficiently publicised, in 2018 these were extended to 8 hours but significantly reduced in number to a mere two locations of one day each. We regularly read the local Isle of Thanet Gazette but did not notice any information regarding the consultation. We don't receive a copy of the free Kent Extra so, as other residents of remote villages, we wouldn't have seen any publicity if RSP had chosen to give notification through this means instead. Both exhibitions again took place in the same outskirt location in the towns, served by an irregular bus service. The Comfort Inn venue in Ramsgate was cramped, crowded and noisy so that, even attending at midday when most other residents would be in work, it was difficult to attract the attention of consultants. If the 2018 consultation in the King's Hall, Herne Bay, took place in the same room as that of 2017, then the setting would have been even smaller than the venue in Ramsgate. Bearing in mind that there are around 90,000 residents of Ramsgate, Herne Bay and the surrounding villages who are potential receptors, the geography, size and duration of events was inadequate both in 2017 and 2018. RSP seems to have been pleased with a turn-out of 870 people at consultation events in 2018, out of the potential 90,000; which leaves us to surmise that RSP chose small venues on each occasion in the expectation of having weeded out all but its small band of known loyal supporters through its limited diffusion of information and publicity.

Indeed, our experience of the event certainly led us to question the target audience to whom it was aimed. There was a notable presence of airport supporters in the Ramsgate event, prompting us to recall rallying cries to sympathisers for the 2017 Consultation: "Turn up, sign in, listen and make at least a brief response on the Ramsgate feedback sheets, even if you are to do a more detailed response on the web". (Email by the Save Manston Airport Association (SMAA), relayed by Chris Wells, Head of TDC, in Thanet Gazette 30.6.17). In another Thanet Gazette article, Mr Wells clarified that (SMAA) acknowledged of its members that they are mainly "out-of-area residents" called "to pack the meetings with supporters." As in 2017, in the 2018 Ramsgate event aggressive behaviour by RSP consultants dissuaded concerned residents from posing any question which might hint at criticism. When director

Niall Lawlor was asked about the potential of night flights, he angrily responded “We are not contemplating (*night flights*) for the 7 millionth time! A number of people in Ramsgate, specially assholes, are distributing a lot of lies and conjecture”. In response to our query as to why 8 night flights are therefore now included in the project documentation, Mr Lawlor continued:” The Inspectorate is mandating it in our application. It’s not our decision. All done by Government Agencies. It’s not us. I’m blue in the face saying this to people, blue in the face about people lying”. In response to our expressed concerns regarding the difficulty of finding alternative sites for a mixed development in Thanet, Mr Lawlor exploded: “Bunch of horseshit! The TDC leader is burying sites, not allowing houses to be built”. However, there was a worst welcome in store for any known local dissident: Mr Lawlor challenged one Ramsgate attendee on his way in to the event, insisting that, in terms of his already-expressed views, he should not be present at the event.

Our obvious conclusion is that the consultation events were held with a view to making the minimal effort possible to be able to simply tick the box in terms of Inspectorate advice.

3. Information presented as a basis for consultation responses: the 2018 PEIR report

a) Manston to fill the shortfall in increases in UK Air Freight

In the Executive Summary at the beginning of PEIR Vol 1 RSP states “The proposals will provide much needed additional air freight capacity to the United Kingdom and also serve to relieve pressure from the other, already heavily congested, London and South East airports”. We suggest that the very success of the RSP application rests upon it proving that there is a national need for increased air freight and that Manston is uniquely able to fill the gap. RSP cites as its proof:

2.1.2 The increase in demand for air transport seen over the preceding years is also forecast to continue in the period up to 2035. There are forecast to be 50% more flights in Europe in 2035 compared with 2015. The demand for air freight is also set to increase by more than 50% across the period 2015 to 2035, with particularly strong growth forecast for the longer distance routes such as Europe-Asia (4.6% annually) and Europe-Africa (3.8% annually).

2.1.3 A large proportion of air freight is currently carried as ‘belly hold’ freight, i.e. in the hold of passenger aircraft, particularly in the UK. But the advantages of transporting air freight by dedicated air freighters, particularly for high-value goods, has led to a forecast increase in the number of airplanes in the worldwide freighter fleet of 70% from 2015 to 2035.

2.1.5 London’s six airports: Heathrow, Gatwick, Stansted, Luton, London City and Southend, facilitate around 76% of the UK’s air freight. However, the Airports Commission report shows that all London airports will be at capacity by 2030. The South East is particularly hard hit by the lack of airport capacity with sustained losses in potential trade running at £2bn/year without additional runway capacity.

So how do these claims measure up to what should be the “key characteristics of an Environmental Impact Assessment (EIP)”, as outlined in the PEIR document?

5.2.1 Systematic..... leading to the use of the information that is gathered to inform decision-making as to whether or not the Proposed Development should be allowed to proceed;

Analytical, requiring the application of specialist skills from the environmental sciences;

Impartial, its aim being to inform the decision-maker rather than to promote the project;

Reference to Department for Transport (DfT) reports, The Airports Commission and the Civil Aviation Authority (CAA) websites indicate that total Airfreight has been stagnant since 2003, has in fact been in decline since 2014, and has little prospect of increasing for the foreseeable future. Moreover, as 70% of the small amount of freight transported by air (0.5%) is held in the belly of passenger planes, this looks set to increase as the economic preference as passenger flights increase elsewhere. There is excess market capacity for air freighter movements due to the strength of the still growing belly-hold market at Heathrow. In addition, Stansted and East Midlands both provide ample capacity for air freight movements in the short to medium term, by which time the south east market will be catered for by the new third runway at Heathrow. Moreover, this reality is echoed in reports by heavyweight experts York Aviation and Avia Solutions.

In the 2018 Ramsgate Consultation event we spoke to Sally Dixon of Azimuth: whose previous failed ventures at Manston Airport bear testament to her questionable level of competency in aviation advisory skills. We asked Ms Dixon whether she had changed her freight predictions following the report by York Aviation on the RSP project. Ms. Dixon accused York Aviation of using a vague methodology and was very clear that 1 million tons of freight will go elsewhere if Manston doesn't step in. However, Avia Solutions' conclusions were devised from triangulated research involving feedback from industry experts, its own knowledge of the sector, and a detailed quantitative analysis of the freight capacity (both belly-hold and dedicated freight) which individual airports would be able to offer. In contrast, it points to several flaws within the research process conducted by Ms. Dixon/Azimuth on behalf of RSP and reviewed in the Northpoint Report. Firstly, Azimuth based its evidence for freight on forecasts for the passenger market, although itself admitting that there are significant differences between the two. Moreover, in referring to forecasts on a global scale, Azimuth conveniently ignores that this indicator is ineffective for the UK, which stands in unique contrast to world trends. Avia Solutions notes that: "To use global trends as the basis of forward projections for the UK market given the historic divergence between the two markets is at best naïve and without the necessary qualification is disingenuous". Azimuth then attempts to triangulate its research by adopting a qualitative methodology (PEIR 2.1.6) based upon a limited sample of 24 interviewees – none of whom had any experience of the largest belly-hold freight sector of the industry, and using a selection of freight-related questions specifically designed and loaded to support the case for Manston. Finally, ignoring the fundamental differences between belly-hold and dedicated freight, and the industry's preference for the latter from an economical perspective, Northpoint claims to quote a York Aviation estimate of 55,000 additional dedicated freighter movements in the south east by 2050. However, this figure is misquoted, as there is in fact no evidence of this claim in the York Aviation report. Specifically making the case for Manston, the PEIR report states:

3.3.226 It has been forecast that a reopened and developed Manston Airport, with a focus on airfreight and cargo, could capture in the region of 300,000 – 350,000 tonnes of airfreight by 2040. We note and provide part of the solution to the problem of a shortfall in aviation capacity in the UK (Manston Airport: A National and Regional Aviation Asset Volume III p11-12 (Azimuth Associates 2017)). This would be from a combination of business returning to Manston Airport, the capture of market share from other airports (either because of better facilities at Manston Airport, shorter haulage distances from airports outside the UK or pressure for slots at these other airports) and from general market growth.

In terms of Manston's alleged suitability to meet this illusory growth and shortfall in freight, Northpoint again misquotes the York Aviation report to support its claim of Manston being the "only realistic opportunity" to extend freight. The report actually said that there was currently ample room for freighters at Stansted and that envisaged for Manston (taking air freight currently trucked to/from the UK to/from Europe) was not feasible for UK airports given our island location. It also points to the inappropriateness of comparing Manston with any of the 6 benchmark airports offered in the Northpoint report. RSP would have us believe that the site enjoys "considerable support among both airlines and freight forwarders" (RSP 2017 Consultation Overview Report page 5) but is able to provide only one quotation to support the claim (RSP 2017 Consultation Overview Report page 5) Indeed, this wishful thinking is emphatically contradicted by evidence and fact. In a study of Air Freight in August 2009, the World Bank concluded "The hub airport is generally located in or near a major population centre to have a significant amount of inbound and outbound baseload cargo". Surrounded on three sides by water, Manston's remote setting has proved the downfall of all previous attempts at its profitable exploitation: not providing enough custom locally to sustain a passenger market and not valued by the freight market when considered against its competitors such as Stansted and East Midlands Airports, which are much more centrally located. During a presentation at the Baptist Church Meeting in Herne Bay on 16th October 2017, even RSP Director Tony Freudmann finally admitted that Manston's location is poor in terms of its distance from centres of population. Lying at the very tip of the country, with no feasible alternative access except a two-lane dual carriageway and the continually clogged two-lane M2, it takes an average of 60 minutes by car on a good day to reach the M25 and thereby access to the main distribution centres; but this journey would take considerably longer for a loaded HGV on these usually very crowded and frequently jammed roads. "It's a completely unsuitable location as the road network in that part of Kent is not geared up to accommodating hundreds of HGVs," said a spokesperson for the Road Haulage Association, talking about the

potential to use Manston as Operation Stack on 31st January 2018. So how will the local road network cope with the thousands of additional HGVs ferrying fuel and goods to and from the airport 24/7? In the 2018 Ramsgate event Ms Dixon was still insisting that Manston would be a hub for perishables as referred to on page 6 of the RSP 2017 Consultation Overview Report, whilst, at the same event, her RSP colleague Bob Grinnell contradicted that this was a non-starter as Manston is “wrongly placed”.

In 2013 Manston had only managed to claim a mere 1.29% of airfreight before closure; if offering such an opportunity, why have these previous efforts to break into the market been so convincingly rejected by the industry? RSP points to the fact that “inappropriate strategies” and lack of investment inhibited success in the past (RSP 2017 Consultation Overview Report page 13). Yet failed strategies in the past have included both the freight and passenger services currently foreseen and, as Avia Solutions reminds us “Many of the commercial risks which precipitated the recent air freight decline and subsequent closure of Manston Airport are still in evidence today.....” the provision of capacity is not the determinant of profitability”. History dictates that it would be unwise to assume that business would automatically follow ambition and investment in a site with inherent disadvantages, but RSP appears not to have questioned exactly why cargo operators or freight forwarders might be prepared to take the risk of switching to Manston when there are better alternatives elsewhere with availability. Moreover, the conclusion to focus upon dedicated freight, contrary to all evidence demonstrating a strong and economic preference for the belly-hold model, presents as folly rather than as an alternative convincing ‘strategy’.

So, has RSP demonstrated the EIP required characteristics of being systematic, analytical and impartial: unquestionably proving an increasing national need for dedicated freight aviation, with Manston uniquely placed to fulfil this need? The answer, as regards to the process and the information available for the decision-maker, is a categorical “no”. Whilst the weight of expert opinion is against the project based upon the evidence given, this same evidence is ignored or misrepresented by RSP with a view to promoting its project.

b) Manston as a Passenger Airport

PEIR 3.3.236 The UK origin/destination for the airport passengers is initially forecast to be from the local area. As the airport and passenger services mature and develop this is expected to change so that the percentage of airport passengers from Mid, North and West Kent, and from London is increased; but the core catchment area is expected to remain East Kent.

During the presentation in Herne Bay in October 2017, Mr Freudmann admitted that RSP does not see Manston as a major passenger airport. Of course, this is no change to the planning during the 2017 Consultation, when discussion of passenger flights nevertheless dominated the presentation in Minster Village Hall. Mr Freudmann expounded that he had already been in talks with Norwegian Air, KLM, Ryanair and the port of Dover. However, we discovered that there had as yet been no contact with Dover at the time of this assertion; neither is it likely that the port would extend its current limited number of cruises as a result of a nearer airport, since flying to London would continue to remain a more attractive part of the package for foreign participants in terms of linking with Cruise ships. All three air companies also denied any contact, with the latter never having heard of RSP. A presentation to TDC, Canterbury and Dover Councils did not take place until after the consultation period. The reality is that there have already been three serious attempts to develop passenger services from Manston which, although verbally supported by residents in general, were unable to attract an adequate number of passengers from the locality; whilst Manston’s isolated position rendered it of no interest to potential travellers from elsewhere. Despite heralding a new age of flight from Manston, KLM was forced to withdraw in April 2014 having sold only 44.4% of seats available for the year; and, despite Infratil’s boast in 2008 of 1,200,000 passengers, by 2010 it closed with a loss of £10,000 per day. Nevertheless, Thanet residents have been flagrantly wooed into providing a positive feedback by the fantasy figure of 1,400,000 passengers by 2041. Compiling its report on behalf of RSP, and perhaps wishing to impress its employer, Northpoint Aviation actually suggests 8 to 10 million passengers! But Mr Freudmann is aware first-hand of the challenge to reach even the first of these targets since, responsible for airport acquisition strategy at Wiggins, he was a Director at Manston when its owner went into administration. He had also previously failed in trying to establish a new route from Manston to Norfolk, Virginia, and thereby lost the public investment he had secured through Kent County Council (KCC). Additional costs involved in handling passengers, in

terms of ever-increasing security and other peripheral services, will in reality again render the service unprofitable, and consequently unlikely to be maintained by the airport for the few locals able to travel regularly. In terms of the comments we have heard from Minster residents looking forward to being able to fly as passengers from Manston, we question whether the public grasped during the 2018 consultation period that this DCO was not going to deliver a passenger airport immediately and, in all likelihood, not at all. And what, according to the experts, are the implications if there is no income from passenger services? “The opportunities for establishing a cargo-intensive airport are limited by economics. Without revenues from passenger flights, it is difficult to operate an existing airport much less develop a new airport.” (The World Bank study in August 2009)

c) Manston as a major Employer

In the Herne Bay meeting of October 2017, Sally Dixon asserted that it is difficult to think of another industry that would bring as many jobs as would aviation; and particularly freight, which brings supply chain benefits: “those figures just keep going up year on year”. Not only does this comment contradict the general acceptance that passenger aviation creates more jobs than freight, but also that the freight industry has in fact flatlined since 2003 and decreased since 2014. Having initially claimed that 30,000 jobs would be available within a newly-created airport during the 2017 consultation, RSP was finally shamed into a disclosure that this should now actually read: “creating almost 30,000 jobs within East Kent and the wider economy by the airport’s 20th year of operation”. In the Herne Bay meeting of October 2017, Mr Freudmann actually admitted: “they won’t necessarily be local”. In fact, “they most likely won’t be local”. Nevertheless, the 30,000 number was once more boldly proclaimed on banners at the Consultation events in 2018; although, curiously, the PEIR report 2018 (2.1.7) details that 4,000 direct and 30,000 indirect jobs will be created in the local economy by 2038 whilst Table 13.2. displays 4,271 direct and 26,056 other. What then is the truth according to RSP? Or, and this is in fact a totally different question, what is the likely reality? In terms of 4,000 jobs in the airport, it should be remembered that when previously in operation under EUJet, FlyBe and KLM, and having equally promised the creation of much greater employment, the maximum number of people employed by the airport at any one time amounted to only 720 in low-paid, part-time jobs. In dealing with RSP’s concept of “indirect”, this term is of course double-counting people who are already employed in other industries: from e.g. oil workers (providing aviation fuel) to coffee growers (whose beverage will be served in the airport vending machines), and who are actually located and operating around the world. In other words, these will not be positions created on behalf of the airport and will already be included in the statistics of the source industry. Such so-called indirect employment can therefore lead to some fanciful results. Indeed, if every industry used this technique, the number of people notionally employed in British industry would far exceed the total population! Every job creates a lot of indirect employment and RSP it is at best misleading, at worst concocting a deliberate lie, to claim that 30,000 indirect jobs will be created within the economy. Talking to Thanet residents and reading social media, we are aware that many locals are literally expecting the creation of 34,000 jobs locally. RSP needs to stop hiding behind this illusory figure, detail exactly what and where all direct and indirect jobs will be in the community and attach a realistic number to each category. It is only by being provided with this information that residents will be able to offer an informed view of whether the RSP project will in fact offer any substantial increase to local employment.

d) The question of Night Flights

Does the PEIR bring us any closer to the truth concerning plans for night flights? According to Roger Gale, speaking on the BBC news on Sunday 11th February 2018, RSP has never, and will never, include night flights in the project. Previously describing such a suggestion as “bunkem” (the Chislet meeting during the 2017 Consultation,) he thus echoed Mr Lawlor’s contempt for those suggesting otherwise (see above). And yet, even at the beginning of the first Consultation process, RSP director George Yerrall admitted in the Thanet Gazette that: “..... we recognise that night flights might be unavoidable”. Indeed, in claiming that the airport would be capable of operating 24 hours a day (RSP 2017 Consultation Overview Report page 21) and assuring that Manston will function in accordance with air freight operations at other similar airports, (RSP 2017 Consultation Overview Pages 21 and 42) RSP have from the outset emphatically set out their intention to gain maximum profit from the airport hub. And, at the Herne Bay meeting in

October 2017, Mr Freudmann clarified that limiting the schedule to only 8 night flights would be commercial madness as this wouldn't be enough to make it worthwhile putting on a shift: "it would only work if we had the same number of night flights as day flights." Precisely. RSP has already factored in two 12 hour shifts in readiness; so we could in fact expect between 12 to 20 flights on average a night, if Manston were to indeed achieve its stated aim of 10,000 increasing to 17,000 cargo flights a year to qualify for the DCO. This conclusion is corroborated by the fact that to transport inbound perishable goods, there will be an urgent need to fly at night, ready to reach outlets by the beginning of the following day. Thus, RSP is very much contemplating night flights in the PEIR document:

3.3.152 Air freight operations will be predominantly during the daytime, 06.00 to 23.00, in accordance with operations at other similar air freight airports. There may be a requirement for night-time flights, the details of which will be determined as part of the on-going project design, taking account of feedback from the Statutory Consultation, and presented with the DCO and assessed within the ES. Freight night flights (between 2300 and 0600) will be restricted by quota count which will be set following public consultation on the draft Noise Mitigation Plan. Yet, as evidenced by Mr Lawlor above, verbal comments in consultation events steadfastly and vehemently denied that night flights were included in the Project. When pressed with reference to documentation, the concept was brushed aside as being a requirement of the Planning Inspectorate (which the Inspectorate itself has denied). At the Herne Bay meeting in October however, and echoing previous comments regarding the inevitability of night flights after all, Mr Yerrall reiterated RSP plans to reincarnate the previous s106 Agreement as a so-called safety-net for residents. As a Director for Wiggins at Manston, RSP director Mr Freudmann knows only too well that the Agreement represented no such protection, in reality and will remember the steady stream of complaints from Ramsgate, Herne Bay, and villages surrounding the airport, as the s106 Agreement was brazenly and regularly flouted. He is only too aware of public opinion regarding the night flight issue at Manston, since he will know that TDC conducted a survey when Infratil previously wanted to open night-time flying at Manston and 73% voted against. On a second application from Infratil, TDC commissioned independent experts to look at the potential impact and they calculated that a 747 taking off at night over Ramsgate would create a noise footprint that would affect 30,000 people. So, what is the truth about RSP's intention to include night flights in the Manston Project? Was Mr Yerrall telling the truth at the outset of Consultation or Mr Lawlor in his outbursts in the 2018 Ramsgate event? What does the documentation say, and are the general public able to adequately access it to form an opinion? Or is it instead relying upon the verbal denials or contradictions of RSP consultants and directors? We believe that the attempt to conceal the spectre of night flights within the consultation information demonstrates that RSP has sought to persuade the public to offer a positive feedback on the basis that night flights will not be an issue, whilst in fact it has blatantly stated the opposite.

e) Environmental Concerns

The 2017 RSP Consultation Overview Report represented our very first encounter with the technical world of aviation planning. Our understanding was that, as the project is an Environmental Impact Assessment (EIA) Development, where an Environmental Statement (ES) is required as part of the Development Consent Order (DCO) application for a National Significant Infrastructure Project (NSIP), RSP was offering us of a Non-Technical summary (NTS) of the Preliminary Environmental Information Report (PEIR) as a means of informing our feedback to the Consultation (page 22). The NTS of the PEIR then subjected us to further alien terminology and acronyms, as we were persuaded that there were plans for Construction Environmental Management Plans (CEMP) regarding Air Quality (page 25), Biodiversity (page 27), Land Quality (page 33) and Landscape and Visual (page 35), a Habitats Regulations Assessment (HRA) (page 27), a Water Framework Directive Assessment (WFA) (page 29), a Hydrological Impact Assessment (page 29), an archaeological disturbance plan (page 31), and a Noise Mitigation Strategy (page 37): all to be submitted with the DCO. Having made a good attempt to at least get our heads around this perplexing terminology and corresponding acronyms, we were unfortunately unable to actually comment upon them in the 2017 Consultation as these studies were not yet available for our perusal and comment at this stage. So, are we feeling better informed this time around?

We understand that Government advice to would-be developers such as RSP is that, during the pre-application consultation process, sufficient preliminary environmental information should be included to enable consultees to

develop an informed view of the project. The key issue being that the information presented must provide clarity to all consultees. Looking forward to RSP following this advice to provide this greater clarity, as well as a greater level of transparency and honesty in this 2018 Consultation therefore, instead we have once again been subjected to a plethora of bamboozling technical jargon and tables: amounting to some 3,907 pages. We have had to search long and hard therein to finally detect the first concession ever made by RSP to the growing body of research concerning the negative effects upon health of those living near an airport:

NTS summary PEIR 1.1.108" There is health evidence drawn from the scientific literature that allows potential impacts on mortality and rates of certain diseases due to changes in noise and air pollutant exposure to be predicted quantitatively (in numerical terms). The scientific evidence shows that, depending on the level of noise or air pollution concentration, these may affect diseases of the heart, lungs and circulation system, mental health and wellbeing, and the overall risk of premature death. Whether there is a health risk and the magnitude of any impact on public health depends on the size of change in noise or air pollution and the population affected."

In terms of the size of change, Manston would be moving from a baseline of zero: in other words, this would represent a change of enormous magnitude for the surrounding population. We also have some telling information regarding characteristics of these particular receptors. PEIR 15.3.6 refers to consultation with the Kent Director of Public Health who highlights that the area around Manston has "low life expectancy and high rates of all-age all-cause mortality in comparison to the rest of Kent", and that that "the local health economy is currently struggling to deliver sustainable health care services." 15.3.7

In other words, Thanet residents are more than averagely vulnerable to the ill effects of living near an airport: having a large elderly population, high levels of socio-economic deprivation, lower life expectancy than the national and Kent averages, and higher rates of cardiovascular disease, cancer, depression, anxiety, dementia and obesity than the national average. Yet, 1.1.91 of the NTS PEIR, states: "The health-related effects are not assessed here as the HIA (*Health Impact Assessment*) analysis has not been finalised and its results are unavailable." In other words, RSP plans to impose a 24/7 cargo airport within a community which will be particularly susceptible to its effects, and yet is denying us comment upon the HIA before it is submitted to the DCO. This is not merely unacceptable but, should the Planning Inspectorate facilitate the development on this basis, would become a national scandal in terms of government collusion in the exploitation of a deprived community.

In our previous submission, we quoted The Alliance of Residents Concerning O'Hare inc (ARCO), who reported that the area heavily contaminated by a single runway equipped airport with light to medium traffic is about 6 miles around the field and 20 miles downwind (12th October 2011). Yet in the PEIR we note that:

6.4.4 A 7 km × 4 km Cartesian grid centred on the airport was modelled, with a receptor resolution of 100 m, to assess the impact of atmospheric emissions from the site on local air quality at locations and in data gathering for historic buildings such as our own:

9.3.2 The study area has been defined as follows: a 1km radius around the site of the Proposed Development
Are we misinterpreting these 100m and 1 km radii as being the extent that RSP believes to be negatively influenced? In fact, at the 2018 Ramsgate event Mr Lawlor claimed that it wouldn't be up to RSP to decide if we were eligible for any compensation at 500 metres from the flight path, where both noise and pollution will be particularly concentrated in taking off, landing and taxiing. And, indeed, our overriding impression of the PEIR document is of its minimisation, or even denial, of any significant ill effects whatsoever. Able to make its own interpretation of the term "significant":

5.4.7 At the EIA scoping stage, the conclusion that is made about significance is usually based upon professional judgement. This is with reference to the Proposed Development description, and drawing on, as appropriate, available information about the magnitude and other characteristics of the potential changes that are expected to be caused by the Proposed Development. The receptors' sensitivity to the changes, the effects of the changes on relevant receptors, and the value of receptors is analysed and considered. If the information that is available at the EIA Scoping Report stage does not enable a robust conclusion to be reached that a potential effect is not likely to be significant, the effect is then taken forward for further assessment.

RSO consequently affords a very narrow interpretation to the term of "significance", which conveniently allows it to limit assessment:

6.4.23 In summary, a clear expert consensus shows that NO_x/NO₂, and to a lesser extent PM, are the only local air quality pollutants likely to be of potential concern from airport operations. If concentrations of NO₂ can be shown to be acceptable around the airport, it is highly unlikely that concentrations of other pollutants will be unacceptable. Therefore, they have not been assessed further.

The PEIR deftly arrives at the conclusion that there is no impact from air traffic therefore:

6.11.3 In this section, only the impacts from road traffic are assessed, with the contribution from aircraft and the airfield being ignored. As shown in previous sections (e.g. Figure 6.15), the aircraft/airfield contribution is negligible more than a few kilometres from the airport,

Continuing to try and unravel relevant information from the PEIR document, we are conscious of a great deal of repetition of “scoping-out” and of repeated conclusions describing harmful effects as “moderate”, “slight” or “negligible”. There seems to be an overemphasis upon effects of the shorter construction phase at what seems to be the expense of considering fallout from the enduring operation itself. But the principal overriding impression in trying to decipher the PEIR is one of inaccessibility:

6.13.2 Given that the Proposed Development at Manston Airport will mainly have impacts from aircraft emissions, which have a very different source–receptor relationship from road traffic emissions, such approaches are not suitable. Given that detailed dispersion modelling of the emissions has already been carried out for the Manston Airport proposal, a more appropriate approach is an impact pathway approach (I-PA). In this, the total population exposure is calculated by multiplying the number of households exposed to a given pollution level, and then summing over all pollution levels. This gives a population exposure measured in household $\mu\text{g m}^{-3}$. This can then be multiplied by a cost factor to obtain an estimated cost of the air quality impact.

6.13.3 For this assessment, population exposure has been calculated by using a database which provides, for each postcode, the coordinates of the centre of the postcode and the number of households within that postcode. For each postcode, the concentrations of NO₂ and PM₁₀ are determined from the gridded modelling results, and these are multiplied by the number of households within that postcode. The results are then summed over all postcodes in the study area to give the population exposure to the two pollutants. Results are given in Table 6.37.

6.10.9 In view of the large number of modelled receptors, the following results are grouped by the general location of the receptors, and results are given for only a selection of receptors (those with the highest concentrations).

6.10.10 Predicted concentrations of annual mean NO₂ at receptors near the airport are given in Table 6.25, for those modelled receptors with an impact of “slight” or “moderate”. At all other modelled receptors near the airport, the impact is “negligible”. Contours of NO₂ PC (calculated as 70% of the NO_x PC; excluding roads) in the vicinity of the airport are shown in Figure 6.14.

RSP’s objective seems to be to dumfound us with concentrations of gobbledegook from which we can only glean these repeated summaries: slight, moderate, negligible. Has this document presented us with the sufficient clarity upon which to form an opinion, or is it instead expecting us to unquestioningly accept RSP conclusions? We have lived here for 25 years, and intermittently experienced aircraft at the airport: we have always been awakened by movement at night, were treated to unpleasant exhaust fume odours when the wind blew from the North and have had conversations interrupted by aircraft noise when in the garden. As others in the community with their own tales of having lost part of their roof through a vortex from a low-flying plane, having witnessed aircraft jettisoning fuel over a nearby school on landing approach, or aware of an oil film covering a garden pond, we need little imagination to understand what effect a 24/7 freight hub airport will have upon our lives. Moreover, and in contrast to RSP’s PEIR offering, there is plenty of available, and accessible, evidence to support our related experiences and corresponding fears. The World Health Organisation’s (WHO) assesses that the onset of significant community annoyance occurs at 50–55 dB during the day and 40 at night. Yet RSP concentrates upon road traffic noise and minimises that of aircraft noise to only “slight rises” (13.10.3) by interpreting the level of noise as measured over a 16 hour period. They are deliberately ignoring that planes from the east cross Ramsgate harbour at a height of 289m and descend from there towards the runway. The noise of their descent is intensified as the land rises from the coast towards the airport, with noise levels recorded of 100dB SEL (i.e. a single event) when the airport was in previous operation. Although 60 dB is considered a level at which a conversation is interrupted, RSP claims no-one will even notice the passing of a plane at 80dB and, tucked away at 12.9.56 in PEIR Volume II, notes: "In Year 20 approximately 10,139 dwellings are forecast to be exposed to maximum noise levels in excess of 80 dB LASmax at night." This means that

around 20,000 to 30,000 people will be subjected day and night to very loud noise, well above WHO acceptable levels; and RSP is being cavalier in its disregard of their welfare. Although RSP spoke of fines being levied against any infringements to the Noise Quota Count, and a Community Group being set up to decide how the money would be spent, this is a totally unsatisfactory solution in terms of mitigation.

f) Economic impact: homeowners

"An airport proposal is probably far more damaging than a railway line. The latter is narrow, and affects a relatively small number of homes along an extended route. But an airport expansion could affect thousands of homes in a very small area," commented a representative from the team advising on compensation for homes along the route of the HS2 high-speed train service from London to Birmingham (The Guardian Aug 7 2013). In 2009 research by academics in Amsterdam suggested that house values near airports fell by around €1,450 per decibel of noise from approaching or departing aircraft. However, this assumes at least the interest of a buyer, because both sources agree that the biggest problem for vulnerable homeowners is that they are effectively blighted and unable to move. The only compensation so far mentioned by RSP is in the range of £4, 000 for up to a maximum of 220 homes once the airport is fully operational. Even if living 500 metres from the runway is included in this group (which RSP consultants apparently cannot answer), our listed property cannot benefit from double glazing. Neither will this be viable for residents of mobile homes in the Smuggler's Leap Community situated at the Western end of the runway. RSP has offered no hint of any optional purchase, thus placing thousands of homeowners in a state of acute anxiety about our futures and posing a further potential threat to the level of economy in the area.

e) Economic Impact: Tourism

The PEIR admits that "the tourism and leisure sector is identified as one of a suite of opportunity sectors for Kent and comprise a sizeable proportion of total businesses There are over 530 businesses within the tourism sector representing 11% of the business base" (13.4.25e), "with 3.1 million visitors per year" (13.4.27) Yet, and despite its importance to the local economy, RSP has failed to do any analysis on the impact of a 24/7 cargo airport imposing itself upon an existing tourist destination.

13.4.27 breaks down the profile of visitors: "75% are day visitors; 66% are adult-only couples & groups - higher in Ramsgate, lower in Broadstairs;By far the strongest reason to visit is the seaside/beaches; most travel by car;most visit in the summer – with a significant peak in August;" But it has made no assessment of the impact of thousands of HGVs, fuel tankers and other road vehicles on potential visitors already struggling to reach Thanet through its limited road network in the Summer months. It has not sought the reaction of tourists to 90dB to 100dB passing over the beaches and other attractions day and night or set out any impact from the increased pollution to tourists spending periods of time in proximity to an airport. The reality would be that, far from maintaining its status of tourist destination, Thanet would become a 'no-go' area for visitors, and the airport would need to at least replace the current level of employment lost in the sector of tourism. RSP's failure to complete a full assessment of the negative impact on tourism, to consult local people and businesses on the potential impact on their future livelihood and economy, to basically conceal its plan to change the face of the island as we have always known it, is unacceptable.

Conclusion

The 2017 RSP consultation bragged that 90% of the previous 800 respondents were in favour of the airport, adding that this was unusual or even unique (Page 15 of the RSP 2017 Consultation Overview Report and the Minster meeting). It was our view that this figure was so unique as to be incredible; and, indeed, Mr Freudmann finally agreed that this was untrue in the Herne Bay meeting of October 2017, when he offered up another scenario: 65% being for and 35% against. Did he reconfigure these figures to try his luck with something a little more plausible? Do they have any source in reality? PEIR 3.1.3 cites The Rochdale Envelope as an excuse for a "degree of flexibility" at this stage. But there is a distinct difference between transparently giving estimates and announcing as 'fact' inflated forecasts which have no foundation in evidence. As one attendee at the Herne Bay meeting in October 2017 summed up: "How can we trust that man?" This participant may have been referring to Mr Freudmann's misdemeanours as a solicitor, to his empty promises of a thousand jobs at Manston as a director of Wiggins, to the many contradictions, exaggerations, gaps, and downright lies being peddled by himself and his RSP colleagues, or

even to the dubious sources of income to be potentially invested into an airport which will fatten shadowy investors at the expense of this beautiful coastal Thanet and the health and well-being of its inhabitants.

In this submission we contend that once again RSP has failed to comply with Planning legislation in the 2018 consultation, with the intent to avert objections; and has harnessed support from local MPs, pro Manston groups and local councillors to aggressively quash resident concern and dissension. We also maintain that the intrinsic information provided by RSP in the 2018 PEIR document, and upon which this consultation depended, was characterised by exaggerated, misleading, contradictory and incomplete intelligence, lacked transparency in terms of its weight and jargonistic communication, and sidestepped and/or minimised significant material. Also taking into account what we have learned of the previous track record of the main RSP protagonists, and the dubious origins its of financial resources, we repeat that the RSP Consultation process remains flawed.

Karen Roper, Minster, Ramsgate

February 2018

Riveroak Strategic Partners (RSP) Application to develop a cargo airport in Manston, Kent

The Public had understood that a full and thorough Consultation process was the condition of a Planning Application being accepted for consideration by PINS. As the 3,200-page document upon which we were consulted has since increased to over 11,000 pages, and includes significant changes, the Consultation has thus been rendered invalid. PINS has also been made aware that feedback from the Consultation was incomplete as the choice of venues for, and timings of, events were insufficient to allow a presence for all interested parties; and stakeholders who would be living, working or studying directly under the flightpath or adjacent to the runway itself were scoped out. PINS also received evidence that presentations and soundbites deliberately misled the public concerning significant content of its documentation about e.g. night flights, noise quota, employment etc.

Applying the Acceptance tests to the RSP application, the Planning Inspectorate itself noted many omissions/discrepancies:

PINS considered that the Funding Statement lacked proof of adequate funds and assets, and information about its directors, staff, existing and potential investors, accounts, auditors and shareholders. PINS requested further information on the sources and availability of funding for the Noise Mitigation Plan, questioned whether RSP could meet conditions of the Human Rights Act 1998, and wanted further evidence to support declarations that investors will underwrite blight and compensation claims. Indeed, PINS expressed concern about numerous unsubstantiated statements concerning funding.

PINS detected that RSP omitted from the Environmental Report figures to Inform the Appropriate Assessment, omitted evidence of referenced post-consultation discussions with Natural England and any other statutory body regarding ecological effects, that there remained omissions in ecological survey data, inconsistencies in the relocation of the existing MoD aerial and Manston Museums, the development footprint within the Northern Grass, and in RSP's worst case assessment of ecological effects and mitigation required.

The work of PINS and the Secretary of State should be transparent and accountable to the public whom they serve. Decisions should not be made on a personal whim, or in yielding to pressure from MPs whose loyalty should be to constituents rather than to friends running a private company for profit. In accepting the RSP application for examination, however, PINS is seen to be overlooking the flawed consultation process and the significant weaknesses, uncertainties, contradictions and omissions in the application. In examination, therefore, we cannot help but fear that PINS will likewise disregard the overwhelming weight of factual and expert evidence signalling the negative environmental and health impact of the conceived airport hub upon this area, as well as the absence of need for, and potential failure of, this project. A valuable brown field site, ideal for the mixed development planned by its owners, lays idle; whilst around it the equally valuable Grade 1 Agricultural land of Thanet is being earmarked for housing without any infrastructure. We appeal to PINS not to extend local misery here by blighting us, and our many regular tourists, with yet another period of uncertainty and collapse, as a private company once again tries to exploit Manston to the detriment of Thanet residents, our economy and health; only for RSP to then achieve what many of us believe to be their real long-term lucrative objective of building houses on the site anyway. Where the PINS' reasons for accepting the RSP application remain questionable, we are now looking to the Planning Inspectorate to inform its actual decision regarding the award of a DCO with thorough and careful reference to expert advice, and local feedback.

My personal objections to the proposed level are based upon the following:

As a resident living 500 metres from the Manston runway for 25 years, during its sporadic previous lives I have had first-hand experience of the pervasive stench of aircraft fumes, of conversation outside being overpowered by the noise of planes landing and taking off, of sleep regularly interrupted by 'unscheduled' flights at night, and of months of sleepless nights in stressed anticipation of early scheduled passenger flights.

As an owner of a Grade 2 listed building, I take seriously my role of 'caretaker' to this gracious building, but fear for its future in standing up to the effects of a busy airfreight hub on its doorstep.

As a parent, as well as educator, I am horrified at the harm which would be inflicted upon our young by noise interrupting both their study and sleep, and pollution further undermining their long-term health and life chances.

