

This is my expanded submission to PINS following the early stage of the Manston DCO examination

It contains:

A brief resume of my contribution to the open hearing on Friday 11th January.

My response to the process so far

My original submission (Registered c. 2100 21/09/18) - as all of this still stands and I have heard and read nothing so far to alter my opinion.

I attended the preliminary meeting and I spoke on the subject of impact at the open hearing on Friday 11th January - this is the gist of what I said

“At the preliminary meeting the chair said that impact would be a major consideration in this examination. He also made it clear that evidence is vital. In assessing the impact of aircraft operations we do not have to rely on theoretical projections and modelling. This is because there is a great deal of relevant real-life evidence available regarding the impact of commercial operations at Manston prior to its closure. [As an example I showed a paper copy of a report from the Manston Airport Consultative Committee (MACC) held in September 2000. It contains a comprehensive breakdown of complaints received regarding noise, noise abatement, pollution, low flying and planning issues.]

“I also have correspondence with the various operators and TDC on the impact of aircraft operations on my family at our home in Broadstairs in the vicinity of North Foreland lighthouse. This relates mainly to noise, pollution, safety, low flying and off-track aircraft. Many people will have similar valuable evidence and I urge them to make all relevant material available to the examination.

“My career in the merchant marine quickly taught me that hoping for the best can lead to disaster, while planning for the worst gives you the best chance. This leads me to believe that we have to face the likelihood of maximum utilisation of all the proposed aircraft stands – else why would you build them? The same goes for maximum utilisation of night flights – else why ask for them?” [End of my little speech]

I attach the MACC report as a pdf. I wish I had more of them to pass on to you. I have contacted TDC planning department to ask whether it holds MACC reports and those of its successor KIACC (Kent International Airport Consultative Committee) and if so if it will make them available to me. I received an automated acknowledgement but I have heard nothing further at this time. If I have any luck subsequently I'll pass the reports on to you. If these important documents are available I think they should be displayed on the Manston airport section of the TDC website, to help everyone understand the potential impact of RSP's proposals.

Examination process to date

I am very concerned that the application has made it this far, given that PINS appeared to find the documentation far from satisfactory. The consultation process was inadequate - in fact to my recollection there was no significant public consultation on the substantially revised application that we are now considering.

The preliminary meeting did little to comfort me as it became clear that should RSP gain control of the land it seems uncertain who would police its subsequent actions and whether RSP would have to

make a serious attempt to deliver on its stated aims; what would happen if it didn't, and if it would in fact be in a position to do more or less what it liked with the land, subject to necessary permissions.

This appears to be an ill-conceived, speculative and unrealistic proposal that – if it were however to succeed - would be detrimental to the wellbeing of residents.

I am concerned – among many other things - about unrealistic flight projections, unrealistic job and economic projections, the lack of financial transparency, the lack of a business plan, the lack of a Public Safety Zone and a QC that would allow a large number of night flights.

I am very disappointed that both local MPs take a very pro-airport stance. Their assurances that there is little to fear from the proposal in general and night flights in particular appear to contradict information contained in RSP's application and must have been very helpful to RSP in allaying concerns among residents who rely on their elected representatives to keep them well informed and look after their best interests. The argument that they were elected on an "airport ticket" does not hold water as there were no credible candidates taking an opposing stance – while a single-issue pro-airport candidate lost her deposit.

My original submission (Registered c. 2100 21/09/18)

RSP has not established that a cargo-hub at Manston is a NSIP. RSP's submission draws on work by Dr Sally Dixon seeking to establish NSIP status. I believe that many of her findings are seriously flawed. This is supported by studies from credible aviation experts; Falcon Consultancy (July 2014), Avia Solutions (August 2017), Altitude Aviation (January 2018) and York Aviation (November 2017). All find that a commercial airport at Manston is unnecessary and unviable.

I share PINS' disquiet about RSP's failure to adequately explain how its project would be financed. This is particularly worrying given national concerns about corrupt money continuing to enter the UK.

I think these issues are probably the most important within the strict terms of the DCO process and should mean that RSP's application will be rejected at an early stage.

However, I have to consider the unpleasant possibility that examination of these two points alone may not be found sufficient to put an end to RSP's plans.

My third concern is the devastating effect that a cargo-hub on the scale envisaged by RSP would have on Thanet in general, Ramsgate in particular and other centres of population including Herne Bay. As a long-time resident of Thanet I feel well qualified to comment on this, as I have known Manston as an RAF base and as a commercial airport. While commercial air-freight operations at Manston were always on a far smaller scale than those proposed by RSP, the impact on Ramsgate was very detrimental. More importantly, though we didn't know it at the time, training flights (in which planes touch down but then immediately take off again, circle round and repeat the process, sometimes for hours) gave us an insight into what we can expect if RSP gets the go ahead and is successful in attracting business to the anticipated capacity. It is a hideous prospect.

The detrimental effects of commercial aviation at Manston were not limited to Ramsgate. Living in Broadstairs, my main concern was the air pollution and the associated health risks. With predominantly south-westerly winds this will always be an issue. Daytime noise was not such a problem as in Ramsgate, but night-time aircraft movements disturbed our sleep. RSP has not

confirmed the flight paths to be employed, so noise may well still become an issue for areas previously little affected.

RSP says that in year two, at least 11,356 homes will experience noise of 80 decibels at night as a result of their project. [paragraph 12.7.55, 28th bundle in PINS's list of documents comprising the environmental statement].

When Manston was operational as a commercial airport I attended packed public meetings at which Ramsgate residents spoke passionately of the poor quality of life resulting from aircraft noise and pollution. I have a file of relevant correspondence with Thanet District Council and the various commercial operators regarding noise, air pollution, safety issues and off-track aircraft. **[End of original submission]**

Thank you for the opportunity to take part in this examination.

My registration ID (20013166)

Ends

Attachment MACC pdf

MANSTON AIRPORT CONSULTATIVE COMMITTEE

Meeting Monday 11 September 2000 at 7pm
at the Airport Passenger Terminal

AGENDA

- 1 **Apologies for absence**
- 2 **Minutes of meeting of 6 June 2000**
- 3 **Matters Arising**
- 4 **Progress Report** including:

Sec. 106 Agreement	update on progress	<i>Barry Coppock for TDC Tony Freudmann for Wiggins Group</i>	<i>Paper 1</i>
Master Plan		<i>Presentation by Wiggins Group</i>	<i>Paper 2</i>
Situation Report – new business		<i>Tony Freudmann</i>	
- 5 **Situation Report by Airport Director** *Alastair Robertson* *Paper 3*
including Complaints
- 6 **Answers to questions received**
- 7 **Any Other Business**
- 8 **Date of Next Meeting**

Other Committee Members are:

RETIRED DIPLOMAT
BROADSTAIRS RESIDENT

Sir Alistair Hunter	Chairman	
Tony Freudmann	representing	Wiggins Group plc
Alastair Robertson	representing	London-Manston Airport
Leigh Herington	representing	Kent County Council
John Fullarton	representing	Kent County Council
David Tyson	representing	Manston Airport Group
Ian Minter	representing	Thanet Chamber of Commerce
John Elliot	representing	Pfizer Ltd
Stephen Sadler	representing	SE England Development Agency
John Bragg	representing	Dover District Council
Gillian Reuby Ron Flaherty Grahame Birchall	(alternating) representing	Canterbury City Council
Mike Kruger MK Airlines	representing	Airport Users
Tony Gould	representing	Transport & Gen. Workers Union
NOTE: Barry Coppock and Dennis Hart	also represent	Thanet District Council

Secretary to the Committee:

Mrs Tessa Sherriff PO Box 168 Broadstairs CT10 2GW
Telephone / fax 01843 862185
E-mail: 113311.1250@compuserve.com

MANSTON AIRPORT CONSULTATIVE COMMITTEE

YOUR LOCAL REPRESENTATIVE

Acol	Sam Hodgson	4 Summerfold Villas Crispe Road Acol Kent CT7 Tel:01843 842764
Birchington	John Garland	1 Daryngton Avenue Birchington Kent CT7 9PS Tel: 01843 845576
Broadstairs	Robert Bayford	Dunollie Second Avenue Kingsgate BroadstairsKent CT10 3LL Tel: 01843 869506
Canterbury area and surrounding villages	Len Claisse	17 Chestfield Road Chestfield Whitstable Kent CT5 3LJ Tel: 01227 793740
Cliffsend	David Jillings	31 Southwood Road Ramsgate Kent CT11 0AJ Tel: 01843 591403
Dover area and surrounding villages	Nigel Whitburn	1 New Street Ash Nr Canterbury Kent CT3 2BH Tel: 01304 812599
Manston	Andrew Baker	7 The Leys Manston Kent CT12 5AP Tel: 01843 823373
Margate	Barry Coppock	55 Dumpton Park Drive Broadstairs Kent CT10 1RH Tel: 01843 864487
Minster	Judith Singleton	The Old Barn Watchester Farm Watchester Lane Minster Ramsgate Kent CT12 4DA Tel: 01843 821255
Monkton	Nicholas Cole	124 Monkton Street Monkton Ramsgate Kent CT12 4JQ Tel: 01843 821700
Ramsgate	Barry Coppock Dennis Hart	55 Dumpton Park Drive Broadstairs Kent CT10 1RH Tel: 01843 864487 16 Grummock Avenue Ramsgate Kent CT11 0RR Tel: 01843 589376
St Nicholas at Wade	Martin Tapp	Shuart Farm Shuart Lane St Nicholas at Wade Birchington Kent CT7 0NB Tel: 01843 847281
Thanet areas not listed elsewhere	Barry Coppock	55 Dumpton Park Drive Broadstairs Kent CT10 1RH Tel: 01843 864487

If in doubt, contact the Secretary on **01843 862185**

LONDON MANSTON AIRPORT

NOISE COMPLAINTS BY LOCATION

JUNE - AUGUST 2000

Acol	17
Ash	
Birchington	11
Bishopstone	
Bridge	2
Broadstairs	2
Broomfield	
Canterbury	2
Chestfield	
Chislet	2
Cliffsend	22
Cliftonville	
Deal	
Dumpton	
Eastry	
Fingleham	1
Folkestone	
Herne	
Herne Bay	6
Hoath	
Kingsdown	
Kingsgate	
Manston	5
Margate	1
Marshside	
Minster	1
Monkton	
Preston	
Ramsgate	192
Sandwich	1
Shattering	
St. Lawrence	
St. Peters	
St.Nicholas at Wade	33
Stodmarsh	
Unidentified	
Upstreet	1
Walmer	2
Weddington	
Westgate	
Whitstable	1
Wingham	
TOTAL	302 FORMS

CAUSAL FACTORS

JUNE - AUGUST 2000

Noise	243
Low Flying	50
Pollution	29
Noise Abatement	23
Planning Issues	1
TOTAL	346

LONDON MANSTON AIRPORT

LOCATION AND CAUSE

JUNE - AUGUST 2000

AREA	Noise	Low Flying	Pollution	Noise Abatement	Planning Issues	Totals
Acol	11			15		26
Birchington	10	3				13
Bridge		2				2
Broadstairs		2		2		4
Canterbury	1					1
Cliffsend	21		2		1	24
Finglesham	1					1
Herne Bay	2		5			7
Manston	4		1			5
Margate	1		1			2
Minster	1					1
Ramsgate	189	13	18	2		222
St Nicholas at Wade	1	28	2	4		35
Walmer	1	1				2
Whitstable		1				1
Totals	243	50	29	23	1	346

LONDON MANSTON AIRPORT

COMPLAINT BY AIRPORT ACTIVITY

JUNE - AUGUST 2000

Activity	Noise	Low Flying	Pollution	Noise Abatement	Planning Issues	Totals
Departure Runway 28	17	2	5	4		28
Departure Runway 10	80	7	9	1		97
Landing Runway 28	60	7	5			72
Landing Runway 10	9	23	4			36
Training	56	3	2	16		77
General			1		1	2
Non Attributable	21	8	3	2		34
TOTALS	243	50	29	23	1	346

London Manston Airport

Runway Utilisation

	Runway 28		Runway 10	
January	1565	96%	62	4%
February	1741	97%	59	3%
March	1772	82%	377	18%
April	1323	53%	1157	47%
May	1268	61%	827	39%
June	1400	59%	979	41%
July	2151	65%	1130	35%
August	2608	64%	1489	36%
September				
October				
November				
December				
Average	13828	78%	6080	22%