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*Telephone:*

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The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol BS1 6PN

Ref: 2001434

Dear Sir/ Madam

Re: Application by RiverOak Strategic Partners for an Order Granting Development Consent for the upgrade and re-opening of Manston Airport

You have asked respondents to state what they agree with in RSP's application for a DCO in respect of the former Manston airport site and why? There is nothing in this application that I agree with, other than statements that it will have an adverse impact on local communities. The technical detail in their proposal needs specialist interpretation but there is much I, adamantly, cannot agree. Just some of these points are addressed below.

- 1 In my earlier submission I expressed concern about the part played by elected politicians in promoting support for RSP's proposal and in disseminating misleading information in support of the application. In particular this relates to the activities of Sir Roger Gale MP who has continued to appear alongside Tony Freudmann to lend support to RSP's proposals for the redevelopment of the former Manston airport site. Evidence of this is posted on Sir Roger's facebook page.

The ExA has asked for detailed CVs from contributors to the reports but have detailed CVs been provided by all the principals in this application? And have they been checked against publicly available information?

- 2 We have been asked to respond to proposals based on indicative rather than confirmed flight paths and the application contains contradictory information on the likely direction of take-off and landing.

In practice, a flight path might be more accurately described as a 'flight corridor'. When the site was operating as a commercial airport, incoming flights were mostly from the east and did not follow an exact line, some planes flew directly overhead, others times could be seen a quarter of a mile or more away. Nor was the height of incoming planes consistent: the

topography of Ramsgate meant that any plane approaching the town at the correct height over the Clock House was then flying below the recommended height over the town.

- 3 If the application were granted, it would be too late for action to be taken by affected communities if the problems of air pollution, noise levels and other factors impacting on the environment, health and well-being worsened. Control and monitoring would be vested in the developer and/or the airport operator. The applicant acknowledges that there will be an increase in mortality and cumulative health impacts but offers no mitigation.

RSP's proposal runs counter to the Government's Clean Air Strategy 2019 which seeks, among other things to protect the nation's health and to protect the environment.

The strategy outlined in the Department for Transport's consultation, Aviation 2050 – the future of UK aviation, published in December 2018, focuses on, among other things - developing a partnership for sustainable growth which meets rising passenger demand, **balanced with action to reduce environmental and community impacts ...**

- 4 Concerns about noise and vibration have been expressed by many respondents. In Question Ns.1.8 the ExA asks whether, given the increased noise exposure in private amenity spaces, does the Applicant propose to create new tranquil public spaces that are easily accessible to those communities exposed to increased noise from the Proposed Development? Our private amenity spaces are our primary places of refuge but this application would have also have an adverse impact on our existing public amenity spaces: in Ramsgate these are our parks, beaches and Pegwell Bay Nature Reserve. It is unlikely, given the geography of the area, that the applicant could create new tranquil public spaces that are easily accessible to a community that includes many poor, disabled and elderly residents.
- 5 In question SE.1.8 the ExA asks for more information on the proposed Community trust fund. A reference to this appeared in early documents but I have been unable to find any detail in the final submission. It seemed to rely on a system of penalty payments imposed to generate income for distribution among communities close to the site perimeter, not throughout affected areas.

I have concerns about the reliability and effective management of a system that imposes a financial penalty on aviation companies, absolving the site operator from any responsibility. I also have concerns about the effectiveness of this type of funding in offsetting the impact on environmental, social and economic well-being of all the communities that would be affected by the proposed development. I know from personal experience that a community fund needs clear principles, dedicated management and commitment to be effective.

For more than 20 years I ran a grant making charity that was set up by a major company and the local authority as part of the planning gain for a large development. In 1990, News International gave just over £3m (equivalent to around £9m today) to benefit residents of just two wards in Tower Hamlets. The trustees decided to invest the funds and use the income to support the training and education of children and adults, the primary focus of the trust.

Over a twenty-year period, this funding did change lives and did make a significant contribution to the social and economic well-being of not just the residents of two wards but to the populations of Tower Hamlets, Hackney, Newham and the City of London. News International remained actively involved until St Katharine & Shadwell Trust merged with a neighbouring community foundation to become the East End Community Foundation.

An example of a community fund on a more similar scale to the RSP proposal could be found on the nearby Isle of Dogs where the community was consulted on the application of donations made in the wake of the 1996 IRA bomb attack. The bombing had a long-term social, political and architectural impact on this area and its socially, ethnically and economically mixed community: the donations were used to fund short-term interventions.

I have serious concerns about RSP's business plan and its financial viability but I trust the ExA is considering these areas as part of its investigation.

Yours sincerely

Jenny Dawes