

From: [REDACTED]
To: [Richard Price](#)
Subject: Manston Airport DCO - Written Representation from Simon Crow
Date: 15 February 2019 16:53:40

SMC Written Representation to the Planning Inspectorate: Deadline 3 - 15th February, 2019

Sirs

I would ask the Examining Authority (ExA) to examine these key matters in relation to RSP's DCO application for the Manston Airport site:

1. Business Plan

In its application, RSP appears not to have included a fully evidenced business plan. RSP's proposition is a purely speculative private venture, unlike most DCO applications, which are typically for government or local authority sponsored schemes. I therefore suggest that, in this case, the ExA needs to be satisfied that the applicant's planned project will be commercially successful. Accordingly, one might have expected to see evidence of financial forecasts – Cash Flow Forecasts, Profit & Loss Statements – extending for the life of the project and demonstrating its financial sustainability and viability. But none, it seems, exist.

2. Aviation Demand Forecasts

The forecasts, on which rests all of the applicant's case, are highly suspect. The four Azimuth Reports are based on one person's (Dr Dixon) personal assessment of the air cargo market. There is no independent corroboration of the Azimuth forecasts. Indeed, there have been four independent expert aviation reports each of which concludes that Manston as a cargo airport cannot be viable. For example, Altitude Aviation concluded: "We consider the (Azimuth) forecasts to be extremely optimistic, not credible or likely, with negligible supporting evidence."

3. Sources of Funds and Credibility of the Directors

- As you, the Planning Inspectorate, have already indicated, there are many questions about the project's funding that remain to be answered.
- There is much uncertainty and a high degree of risk around the project.
- There is sparse evidence of the source and availability of funding for the applicant's proposition.
- On two occasions the local authority, Thanet District Council, has rejected previous applications by RiverOak, again primarily for lack of evidence of funding.
- The RSP directors have no track record in this sector, except for failure, serial insolvency and other issues.
- The funding source appears to be based on a shadowy, offshore investment fund in the tax haven of Belize.

4. Environmental Impact

- The applicant's submission documents appear to significantly downplay the impact of noise for people under the flightpath.
- For example, i) RSP uses noise levels which measure average noise over a period of time, but the true annoyance occurs from the extremely high and short-term noise levels from aircraft passing overhead; ii) RSP claims just 225 residential dwellings will be exposed to significant annoyance and disturbance from noise, but this is just not credible given the population of approaching 80,000 people under the flightpath and known previous recorded aircraft noise levels in the area.
- Throughout, over the last three to four years, the applicant has been extremely evasive about the need for night flights, repeatedly telling locals that RSP do not need night flights. However, it is clear from its DCO submission that night flights are indeed planned, although, even here, the true level is not specified. Is it eight flights per night? Or 18 flights per night? Or is it based on the quota system, which potentially could be many more flights during the night? Or is it based on 17,100 ATMs per annum or on 83,000 ATMs per annum? RSP's submission is entirely elusive and vague on this key issue for local residents.

- The adverse environmental effect of the applicant's proposals will not only impact local residents but will also seriously affect schools, businesses, tourism and local heritage sites.

For supporting evidence, I would simply direct the ExA's attention to the mountain of evidenced material, against the applicant's proposals, submitted by the No Night Flight Group, at this time. The submissions contain a great deal of supporting evidence, detail and commentary.

Ref: WRITTEN REPRESENTATIONS FROM NO NIGHT FLIGHTS: DEADLINE 3.

It is my conclusion that, should this DCO be granted and the applicant's plans then go ahead, Ramsgate would become the noisiest and most air-polluted urban centre anywhere in the UK.

Furthermore, as this is entirely a speculative private venture, I would respectfully suggest that the ExA needs to be fully satisfied that we are not dealing here with an applicant having a severe case of Naïve Optimism!

[My registration identification number is 20013600]

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