I sat on the Manston Airport Consultative Committee (MACC) and the Kent International Consultative Committee (KIACC) for the Manston Airport Group [MAG]. The same issues that plagued the local area at the above committee meetings, have not been adequately addressed in the DCO application, presented by RSP to PINS/ExA. The DCO gives no comfort to the local residents and businesses. It would be well known to the RSP management what issues these were, especially when one of the RSP Directors was part of the past management team, of a previously failed Manston aviation company. Moreover a member of that company (Mr P Tipple) tendered their resignation citing "The genuine concerns of the residents of Ramsgate where not being addressed"? Those genuine concerns are even more so when looking at RSP's current documents especially when one of the DCO applicants was part of the Wiggins/Planestation team!

I wish PINS to investigate the following:-

1. The DCO application is not commensurate with the site being an NSIP.

- (a) The adequacy of checking and investigating other more adaptable airports and old RAF bases with better links, has not been addressed in the application.
- (b) The site is bounded on three sides by the North Sea and English Channel (all shallow waters). This would impact on its availability to serve the UK as the DCO application appears to think it will.
- (c) The ExA would have the York Aviation evidence and I would bring this to the attention of the ExA from a website Loadstar;-

"Manston row escalates as consultant slams potential for profitable freighters

<u>Alexander Whiteman</u>14/02/2019"

(d) Appendix one clearly shows that for a substantial time, the freight is not only low it doesn't equate Manston to being a NSIP at any time.

2. Noise Monitoring and Control.

- (a) In the submission (**paragraph 11 of APP-009**) it indicates that the permanent fixed noise is at a distance of 6.5km from take-off roll. This would not enable correct noise monitoring.
- (b) The evidence is very clear that a noise monitoring system was in place at Manston (KIACC/MACC minutes) and a RSP Director attended many meetings regarding Airport Activity.
- (c) The RSP documents do not deal with a real time and more effective system of monitoring noise and routes and that is via a gated system. This system is used at many UK airports. Heathrow and other UK airports have real time systems.
- (d) The DCO application could not be described as having a "best practise" approach to noise when it projects to having more freight than the Midlands?.
- (e) At the very outset a "Quiet Night Charter" and a web-based tool for residents to access flight data, such as xPlane is a requirement for airside operations.
- (f) The Applicants do not address the issue of small aircraft that fly around off to one side of the airport. I attach a letter (Appendix 2) from TDC outlining the route issues and General Aviation (GA).
- (h) The applicants have not sought views from the past Airport Consultative Committee members.

- (i) The Applicants have not addressed the past issues of Manston which would have been contained in the KIACC/MACC minutes.
- (j) Training flights have a significant affect on quality of lives. As they travel along the Thanet Coast, the matter of training flights and how they are to be monitored has not been adequately addressed. I am placing but one of many complaints about this issue in Appendix 3/3A.
- (k) Much has been made of the off route Jets and that the will not overfly sensitive areas, this is not accurate, I am therefore submitting Appendix 4 as a reference to how and why it happens and needs to be addressed with the intensification of use that the DCO brings.
- (I) The issue of engine testing and noise has not been addressed fully within the DCO?

3. Wind Tip Vortices

- (a) Wind tip Vortices dangers have not been addressed in the application in to how many properties are to have remediate work to safeguard residents under "The Worst Case Scenario". The projected movements indicate that they should follow the same practises as Heathrow. I attach a letter (Appendix 5) regarding this matter more than one incident of this type took place.
- (b) Of great concern would be the above acting on a Kite Surfer whose canopy may collapse or cause them to hit the Beach/water hard causing the inevitable injuries. For the record this activity has been active all along the North and South Thanet -

shoreline unencumbered for a good few years. Just last year the UK

Championships took place (very successfully) on the Main Beach of Ramsgate.

The DCO application doesn't go into the cause and affect on shore side activities and how they propose to compensate for loss of business.

4. <u>Environmental Monitoring</u>

(a) In the attached three appendices (6,7,8) for 'Environmental Monitoring' for Manston Airport, they deal with how and why the system was set up.

This activity was only used short term when the Airport requested that the Local authority remove it. Note that in appendix 6 paragraph 4, it deals with 'proportional use' and given the clear intensification of use under the guise of a DCO the application does not adequately address the monitoring of the environment.

5. <u>Airport Discharge Discharge consent</u>

(a) In appendix 9, and the obverse side deals with the real issues of the discharge Consent which to this day have not been adequately addressed.
Given that the DCO application has a fuel farm for the airport alongside the road and the end of the runway its now imperative that shut off valves need to be placed on the routes into the aviation fuel bunkering farm as well as along the runway and apron system.

6. <u>Taxi way and road re-alignment</u>

(a) I am very concerned that the issue of Ground Jet Blast and its very real dangers are not fully covered in the application and the potential for even more routes and access being taken away. Certainly Summit Aviation is at risk with the proposed intensification and

aircraft stands being proposed and it may well be that another road may well have to be closed off to facilitate the DCO?

Clearly the DCO Application gives no comfort to the residents and businesses of the area. It is difficult to view how the intensification of use under the guise of a DCO gives us any protection. The worst case scenario should applied to the intensification of use over the current section 106 - and that a section 106 that is enforceable and protects the public must form part of the Application Process?

The matter of the "Precautionary Principle or even Precautionary Approach? would clearly apply in a great many areas of the DCO?

The Duty of Care for our community lays with the ExA in its deliberations especially with regards to a Public Safety Zone (PSZ) that the DCO intensification of use over and above the existing sec 106.

We have been asked to respond to an application with too many could's, maybe's and might be's within the various documents. Given that we do not even have a local plan to refer to, I fail to see how this can be a NSIP let alone meet the criteria.