

This is my contribution to the recent open forum session – it was read for me (in a very cut-down form) as I was unable to attend.

It references the lead examiners comment made at the preliminary meeting on the importance of impact.

It expresses my hope that the recent revelations by RSP re night flights will result in a change of stance by the local MPs. It also explains why I don't think it will and explains why I find this so worrying.

It looks at the worst case impact and the ways in which I think RSP is attempting to have its cake and eat it.

[MACC & KIACC documents. I have already supplied PINS with one set of MACC minutes containing noise/pollution/safety complaints and I believe I am correct in saying that the examiners are keen to see more of these. My request to TDC for more of the same has elicited no response, but fortunately I have very recently received a large bundle of airport-related material including some MACC & KIACC minutes. I have copied all documents to NNF and I will liaise with NNF about getting them into pdf form acceptable as evidence for this examination. I hope either I or NNF will be able to get them to you soon. **Please confirm that this will be useful and acceptable to you.]**

My name is Alan Welcome – I was born in Margate and I've lived in Broadstairs for about thirty years.

I have taken a keen interest in protecting our local quality of life by objecting to attempts to introduce commercial night flights at Manston since it was sold by the RAF. Over the years it has become clear that night flights would be vital for any chance of having a successful airport. Therefore my opposition has extended to wishing to see a permanent and irrevocable end to commercial aviation at Manston.

In this wish – and insofar as the current threat to our lifestyle is concerned - I continue to be encouraged by the comment made by the chair of the examiners at the preliminary meeting when he said that impact would be a major consideration in this examination.

In addition to the archived information about noise, pollution and safety that has been made available to PINS, it is encouraging to see that the DCO process is slowly teasing out the real nature of RSP's aspirations with regard to atm numbers and night flights - and the negative impact the operations will have on Ramsgate and surrounding areas. Of course this requires us to accept that RSP really does want to develop a major cargo-hub at the former airport; the lack of clarity from the applicant even at this late stage means that this still seems very far from clear and that this is in fact a not very cleverly disguised land grab.

But – accepting that aviation is the aim for the sake of discussion - in the light of RSP's recent admissions regarding night flights I wonder if we can expect our MPs to change their stance and finally begin looking after the interests of their constituents - as they are supposed to do? Probably not. And that is a continued cause for concern. Why are they so sure that the DCO will succeed when all the evidence so far clearly suggests it should not?

This unwavering support becomes a greater worry the further we get into this process. This is a unique, and to my mind, totally inappropriate use of the DCO process – which if it were to succeed

would probably serve as a very bad precedent and require legislation to substantially refine and tighten the DCO qualifying parameters.

So as I spend my time dutifully complying with the requirements of PINS, there are unfortunately some niggling, underlying questions in my mind; is this a waste of my time and energy? Is this already a done deal? After all – at the end of the process PINS only advises – someone in government makes the decision.

There is the uneasy feeling that we are being duped. And when I say ‘we’ I include PINS and the examining body along with everyone opposed to this application.

It is my great hope that the examiners advice will be so strongly to reject the application that even the most brass-necked politician would feel unable to put it aside. But I don’t know whether the examiner’s advice will be in the public domain prior to final decision – in this case at least I think it most certainly should be.

Concerning the Worst Case impact

RSP now says it will cap cargo ATMs at 17,100, passenger ATMs at 9,368 and General Aviation at 38,000 ATMs. The proposed cap is well below the physical capability that RSP is asking to develop. As the ExA has identified, there is no Environmental Impact Assessment (EIA) for the full capability that RSP wants to build and there has been no consultation for an airport of this size either.

We hear suggestions that this DCO is in part a practice run for the Heathrow third runway DCO. I am in contact with NNF, which in turn is in close contact with the Heathrow Association for the Control of Aircraft Noise - HACAN. NNF has shared with HACAN the discovery that the DCO consulted on publicly may in fact be a fraction of the size of the DCO that is later submitted to the Inspector. NNF has also shared the discovery that the EIA does not need to reflect the potential worst case impact of the airport that is later proposed. Consequently, HACAN is paying close attention to the Manston DCO.

I take no comfort from any proposed cap on ATMs. If the airport as proposed by RSP is actually built, and if it is successful, the operator will undoubtedly seek permission to use more of its built capacity, which will be in excess of 165,000 ATMs . That’s how aviation works – London City, Stansted and Luton are all recent or current examples of airports asking for permission for more flights on existing airports. If RSP really thinks that it will cap to the suggested number, then it does not need anywhere near the number of stands or the amount of land that it suggests in its plans. If the ExA is minded to grant a DCO, then it should only allow RSP the development and the land it actually needs for the smaller airport suggested by its cap.

And if RSP thinks that the “worst case” is 17,100 cargo ATMs as set out in its new suggested cap, then it is not adding any cargo ATM capacity to that which already exists. York Aviation – respected aviation experts - say that the capacity for 21,000 cargo ATMs already exists. If this is the case, and if RSP is proposing fewer cargo ATMs than the current cargo ATM capacity, then there is no case for a DCO.

It seems obvious to me that RSP is trying to have its cake and eat it. It wants all the land, and the capacity for over 165,000 ATMs, but wants to do an EIA for just a fraction of that number. I submit that the ExA should either reject the DCO as adding zero cargo ATM capacity; or constrain RSP’s development to the much smaller amount of land and development needed for its capped ATMs; or require RSP to do an EIA for the ATM capacity for its full proposal and then to consult on that EIA.

Thank you for hearing my views.

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