

From: [REDACTED]
To: [Manston Airport](#)
Subject: Written summary of the oral submission by Richard Oades at the Open Hearing on March 18th 2019
Date: 29 March 2019 22:16:02

Sirs,

I apologise if this submission is required as a pdf. I am abroad and have limited computing resources. On my return to UK next week I will be able to resubmit in the correct format if required.

Richard Oades

Written summary of the oral submission by Richard Oades at the Open Hearing on March 18th 2019

Noise Mitigation Plan.

RSP indicated previously that they anticipate costs of around £4m to cover the cost of up to 1,000 properties at £4,000 each plus relocation costs for up to 8 properties of £1.6m. RSP has now suggested that its maximum noise insulation will be £10,000 per property. This will apply to few properties – not to all of those who will experience life-changing amounts of aviation noise.

The ExA rightly asked RSP to provide detailed costings used to arrive at these figures as well as asking where the availability of this sum is subject to any form of guarantee. RSP's response was to say that they had not included detailed costings because they have estimated the costs based on costings at other airports, £2,000 per house from Manchester Airport and up to £3,000 per house from Gatwick Airport. RSP declared that their £4,000 per house is therefore generous. RSP also goes on to say that its 'assumptions' as to the value of homes is 'generous' before going on to explain that this generous valuation is based on yet another assumption that the value of properties will rise due to the commercial success of their proposed development. This kind of 'assumption' is typical of RSP's approach to its proposal and the whole DCO process. Residents such as myself have consistently been presented with scenarios as 'fact' when, in actual fact, they are assumptions and assertions made by RSP. Such assumptions regarding the sums of money required in terms of noise mitigation are made all the more ridiculous and cause even greater concern given that RSP has failed, to date, to provide any real evidence of funding for their whole proposal, let alone the noise mitigation plan and given that RSP's approach to noise modelling is significantly flawed. The noise mitigation plan is based on noise modelling methodology that significantly underplays both the levels of noise experienced and the numbers of people and households suffering adverse effects. RSP's noise modelling appears to ignore the guidance which says that noise risk assessment should consider individual noise events that exceed 60dB. A 60dB LASmax contour is not provided by RSP, one can only presume because it would take in many, many more households and people than suits them.

Any and all of us who experience noise from airplanes flying over our heads at night time know that levels of over 85dB can be anticipated, something that is recorded as

fact in the minutes of the Kent International Airport Consultative Committee minutes. RSP's proposal and their subsequent answers to questions on noise appear to suggest that the noise levels produced by the significant numbers of ATMs they propose during the night would not be sufficient, in general, to cause the onset of sleep disturbance, that is, to wake us up. Again, lived experience and recorded statistics give lie to this. This number of planes at levels of noise of 85dBs and over cause significant sleep disturbance. RSP, of course, choose to focus on the average aircraft noise which will necessarily bring down the hypothetical noise levels. This is disingenuous. Actual people, sleeping in actual beds, under actual flight paths at night experience single noise events and these single noise events, rather than average noise, is what wakes people up. Given that the noise levels are higher than those anticipated by RSP, the numbers of people affected by that noise are significantly higher than those they claim will be affected. Bickerdike Allen, aviation experts, stated in their report that the number of people affected by a Boeing 747 within an 85dB contour would be 'up to 30,903 people'. RSP's noise modelling is not to be trusted.

As previously stated, this means their noise mitigation plan cannot be considered robust. Noise insulation would be offered on the basis of averaged out night-time noise, again not recognising the impact of individual single noise events that are so damaging. RSP know full well that their proposal would bring significant adverse effects on many, many thousands of people. Instead of fully admitting to this and seeking to present a comprehensive and sensitive noise mitigation plan, based on accurate noise modelling, they have chosen to obscure, to fudge, to underplay and to ignore the true impact of their proposal, in part, one must assume because they simply do not have the money for a proper noise mitigation plan.