

CORPORATE RESOURCES

Please ask for: Iain Livingstone

Email: iain.livingstone@thanet.gov.uk

Date: 03/05/19



Dear Mr MacDonald,

Application by RiverOak Strategic Partners to upgrade and reopen Manston Airport Covering Letter for Deadline 6 submission

Please find attached Thanet District Council's response to the Examining Authority's second round of questions. Following the submission of revised versions of the Noise Mitigation Plan (NMP) and the document titled "Applicant's Written Summary of Case put Orally - Noise Hearing and associated appendices" at deadline 5, the Council wishes to comment on the information submitted. Please find attached the report of Ricardo Energy and Environment on behalf of the Council into the documents produced which we respectfully request the Examining Authority consider when assessing these matters. These conclusions and requests for further information are summarised below:

- A version of the list showing the properties that are eligible for noise insulation and ventilation should be provided, which includes an indication of any concerns about the suitability of particular properties.
- Westerly and easterly operation contours should be provided to form the basis of noise insulation and rehousing eligibility.
- To update the list of properties following revision of the contours and consideration of suitability of noise insulation for the park homes at Smugglers Leap, with potential provision made for rehousing if necessary.
- Consideration of the cumulative impact of combined development noise levels (airport and traffic) at receptors through combined predictions and contour maps.
- Single mode LAeq,30mins and LA01,30mins contours plans should be provided so the effect on schools, in particular the outdoor curriculum, can be considered.
- Provision of information as to how the onset of annoyance in populations not habituated to aircraft noise, which applies to Manston Airport, has been considered.
- Request for response from the applicant for request 10.
- Request for a note on why QC4 limits are required instead of a QC2 limit.
- Further information from the Applicant should be provided on how many awakenings there would be across the population overflow at night, rather than the potential for awakenings in an individual.

Reception: 01843 577000

Email: customer.services@thanet.gov.uk

Web: thanet.gov.uk

Facebook: [@ThanetDistrictCouncil](https://www.facebook.com/ThanetDistrictCouncil)

Twitter: [@ThanetCouncil](https://twitter.com/ThanetCouncil)

Head office: Cecil St, Margate, CT9 1XZ

- Details should be provided of any Listed buildings within the 60 dB LAeq,16hr or LAeq,30mins (in the case of schools) contour maps.
- Request for response from the applicant for request 15.

Particular recommendations for an update of the NMP are also provided for clarity below:

- Noise insulation and rehousing to be based on separate westerly and easterly contours that are likely to represent actual noise exposure on a particular summer day rather than a notional average of the two.
- QC2 limit for night time movements.
- Demarked engine test area to be set out in a plan attached with the DCO and that this is located away from noise sensitive receptors and at a location agreed with the Local Authority.
- Details on how effective noise insulation and ventilation will be applied on Smugglers Leap homes and if noise mitigation and ventilation cannot be suitably applied that consideration for relocation be made.
- Request single mode LAeq,30mins and LA01,30mins contours so the effect on schools, in particular the outdoor curriculum, can be considered.

In addition to the above requests and recommendations, the technical note submitted outlining the cost implications of revisions to the NMP states no provision for mitigation to be installed in noise-sensitive buildings within the £5.6million, as the NMP as current drafted includes no mitigation for schools initially. This will need to be reviewed and potentially increasing following the consideration of the 30minute contour maps as outlined above.

As the relevant local planning authority, Thanet District Council will be expected to be responsible for enforcing the provisions and requirements set out in the DCO, including requirement 9 which requires the operation of the airport to be carried out in accordance with the Noise Mitigation Plan (NMP). Given the importance of the NMP to be effective in reducing the effects of noise, as well as serving to dis-incentivise airport users from breaching the noise limits, the Council request that further information is provided about how the penalty charges will be sought and enforced by the airport operator to comply with requirement 9 and generally how users would be held accountable by the airport operator for the requirements in the NMP. The Council would also raise concerns about the penalty amounts and noise limits in 16.2 and 16.3 and suggest that these are increased to reflect penalty charges at other airports to achieve the aims of the NMP. For example, London Luton Airport set the fine amount at £1000 above 82 dB(A) for the day time period, with £2000 above 80 dB(A) in the night-time period. Provision should also be made in the NMP to increase these fines in line with inflation or a similar index.

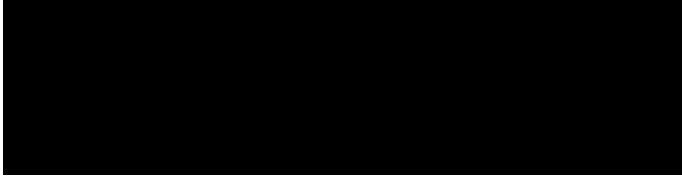
We also raise concerns about the effectiveness of the Airport Community Consultative Committee within the framework established in the revised NMP submitted at Deadline 5. In particular we wish to draw the Examining Authority's attention to the "Guidelines for Airport Consultative Committees" (GACC) document from April 2014 and the following suggested changes:

- Representatives from users of the Airport should be part of the committee in accordance with the GACC.
- Provision of information on the role of the Committee on a dedicated website (or the Airport's website), including scheduling and minutes of meetings.
- Provision for consideration of how select/all meetings can be open to the public.

- Inclusion of the initial broad terms of reference for the Committee within the NMP, with provision for annual review by the independent chair.
- There is no definition of “duties” within point 8.2 of the NMP, creating ambiguity as to when a managing agent would be appointed by the airport.

If further clarification is required then please do not hesitate to contact me on the information above.

Yours sincerely



Iain Livingstone
Planning Applications Manager
Thanet District Council