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Sent: 11 June 2019 11:44
To: Manston Airport <ManstonAirport@planninginspectorate.gov.uk>
Cc: Eileen Richford <eileen.richford@ramsgatetc.org.uk>
Subject: Submission from Ramsgate Town Council

Dear PINS,

Please see attached submission from Ramsgate Town Council to the examination of the proposal to grant a development consent order for the reopening and expansion of aviation activities at Manston airport.

The Council still holds to its original concerns about the damage to investment and the growth of the tourist/ visitor economy in Ramsgate, but having considered the arguments, documents and assurances given by Riveroak Strategic Partners, the Council feels compelled to outline its concerns about the:

- (a) The business case for reopening Manston Airport.
- (b) The financial structure behind the DCO application and
- (c) RSP's budget allocation and proposals for mitigating or ameliorating the effects of sound and vibration caused by any proposed overflights in Ramsgate.

RTC does not consider that (a) a scheme's alleged popularity/ unpopularity or (b) the character or bona fides of either the applicant, their supporters or those who object to the proposal to be material factors in the determination of this proposal.

I am empowered to submit this submission by virtue of a resolution passed by an Extraordinary Meeting of the Council held on 21st May 2019 as follows:

019. POLICY TOWARDS MANSTON AIRFIELD
INFRASTRUCTURE PLANNING ENQUIRY

It was proposed by Cllr Campbell that:

'The Clerk be instructed to submit a response to the examining body for the DCO application by River Oak Strategic Partners (RSP) on Manston Airfield, based on the majority views expressed by the public meeting held today (21st May 2019) which expressed concern about this application. The response will be given oversight by the Chairman and the combined Cttee Chairs before transmission'

Seconded by Cllr Green.

RESOLVED

The meeting passed this resolution unanimously and it is therefore Council policy.

Please confirm receipt of this submission. We reserve the opportunity to submit further documents in the form of additional appendices before the deadline of 14th June 2019.

Should it be required, I will answer any questions by cross examination by either side in this matter and by your good selves.

Yours faithfully,

Richard Styles

Richard Styles

Town Clerk
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Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 8(3)

Application by RiverOak Strategic Partners for an Order Granting Development Consent for the upgrade and reopening of Manston Airport

**Commentary on answers received during the examination process
from Ramsgate Town Council**

Foreword

This is a planning application like any other with the same material considerations. It may be that there are batteries of highly paid lawyers and advisors, arguing arcane points on evidence, in front of the Planning Inspectors, but the issues come down to the following:

- (a) Is it reasonable and justified to deprive the lawful and rightful owner of the land pertaining to the former Manston airport by a process of sequestration, for the purposes of reopening and upgrading the airport? Does this process meet the criteria of being a key piece of UK National infrastructure, which justifies the sequestration?
- (b) If (a) passes the test of justification, is the business plan proposed by Riveroak Strategic partners, a viable means of doing so, and is there the wherewithal within the finances of Riveroak Strategic Partners to deliver the reopening and upgrading to a good standard? Is it clear and transparent where this finance may be obtained, if it is not already available?
- (c) Is Riveroak Strategic Partners a corporate body of sufficient good standing, to pass what should be a rigorous test of due diligence, when consideration is being given to use what are extensive powers of sequestration via compulsory purchase of the land owned lawfully by another corporate body?
- (d) If items (a),(b) & (c) are satisfied what are the material considerations in terms of the effects that reopening and upgrading Manston Airport on the area under the proposed flightpath and has sufficient weight and consideration been given by the applicant to adequately mitigate against those effects?

- (e) What are the material effects of the proposed reopening and upgrading of the airport on the economy of Ramsgate and its environment and do the benefits of any reopening and upgrade of the airport outweigh any reasonable forecast of detriment to those material considerations?

What are not material considerations, that Ramsgate Town Council(RTC) has heard expressed at the early part of the proceedings were:

- ❖ Claims of alleged popularity for the DCO proposal within the populations of Ramsgate and Thanet and:
- ❖ Alleged electoral endorsement of the proposal in local and national elections held since the outlines of the application were first publicised.

RTC's view is that these claims should be struck out on normal Planning grounds as not being material considerations, and that in any case, the corroborative evidence to justify these claims is not available. As far as can be seen, there have not been any statistically robust opinion polls to justify popularity either way. This is understandable, in that those living in the flight path would be likely to object, whereas those living outside that area and believing in the claims of jobs and prosperity might tend to support the proposal.

RTC also holds that statements made about the applicants personal standing or those of those opposing the application are also materially invalid and should be struck out. The exception to this is where individuals make claims of special knowledge. In that case there bona fides should be scrutinised and weighed in the balance.

This submission will now proceed to comment on the responses received on the questions put during the examination proceedings.

Is Manston Airfield an intrinsic piece of national infrastructure and therefore does it qualify as such for the purposes of granting a DCO?

Manston airfield closed in May 2014. It is now 5 years since the airport closed and very little is left apart from some buildings and the runway. The Department of Transport have availed themselves of the derelict site, in order to create a facility for 'Operation Brock'. This facility is an ad hoc lorry park to hold HGV's, should there be any hold ups at Dover, which is a major conduit for trade with the EU.

During these 5 years, apart from the continuing series of proposals from Riveroak Strategic Partners and their predecessors, this piece of strategic infrastructure has not attracted other would be airport operators and if the DCO fails, then we presume it will be developed for housing or mixed use.

The Airports Commission discussion paper 6 outlined the situation quite well around the time of its closure (June 2014):

'However, the varying fates of London Southend and Manston provide useful contrasting case studies on the possibilities for development of smaller airports. London Southend, under the new owners Stobart, successfully developed commercial relationships with easyJet and invested in airport infrastructure, to deliver a small but growing new commercial airport. In contrast, despite positive plans and the high-profile experienced staff members joining, Manston airport closed on 15 May 2014, less than 12 months after its purchase by its new owner. Discussions are still ongoing about whether the airport can be reopened as an active airport, with a new buyer or support from the local council, or whether the land should be used for other purposes (for instance housing). The airports had very different starting points, different catchments and strategies, all of which contributed to the different outcomes.' (My italics)

This extract suggests a case study comparing the fortunes of Southend airport and Manston airport.

Southend Airport:

- ❖ Owned or operated by a well-known large logistics company, with the ability to employ suitably qualified staff.
- ❖ Successful commercial relationships with aircraft operators.
- ❖ Excellent and updated connectivity with road and rail transport modes. London Southend has a purpose-built railway station near the airport with 5 trains per hour.

- ❖ Well focussed management to build a small, growing, and presumably profitable commercial airport.
- ❖ 40 miles from the centre of London, with access to the centre of England via the M25/M1 or via East Anglia and the A14.

Manston Airport:

- ❖ Has failed to grow and become profitable under at least two (2) different airport operators.
- ❖ Abandoned for 5 years with little remaining infrastructure.
- ❖ No 'in principle' agreements with shippers or airline operators.
- ❖ Driven by a financially based organisation and not one versed in logistics.
- ❖ Poor connectivity. The M2 motorway is virtually unchanged since its construction in the mid 1960's. The local road infrastructure is again lacking and suitable for an airport of the 1920's (Operation Brock may come awry, should it operate, using this infrastructure). The rail infrastructure dates from the 1840/60's with modification in 1926. There is no direct rail connection and there would need to be a shuttle service from the airport to the proposed Thanet Parkway station or better still Ramsgate station which has services on 3 lines compared to 1 line at Thanet Parkway.
- ❖ Very large expansion plan with no clear idea as to how this expansion is meant to deliver economic benefit and/or profit to the project subscribers.
- ❖ 75 miles from London. Access to the centre of England is by the congested Dartford crossing and the M25 or via East Anglia and the A14. In other words, an HGV leaving Manston would not only have to travel an additional 25 miles compared to a vehicle leaving Southend. The same HGV would also have to pick its way through the congestion in North Kent and the Dartford Crossing before it can then proceed to the centre of England.
- ❖ Southend has a number of large conurbations within a 20-mile range of the airport, where as Manston is surrounded on 3 sides by water and has much fewer population centres within 20 miles.

In conclusion

- ❖ For Manston airfield to be regarded as a key piece of infrastructure it would surely require more than a process driven by the desires of a financial entity and its supporters?
 - ❖ Surely the airfreight sector itself would be requiring the reopening of Manston airfield in the same way that the Freight Transport Association might propose a particular road scheme such as is the case with the M4 in Wales? We have seen no evidence that Shippers, logistics operators or aircraft operators are lobbying for the reopening of Manston Airfield. That is not to say that they might not use it, given some kind of financial inducement from RSP.
 - ❖ The UK govt through various documents it has published, has hardly mentioned Manston airport, apart from the extract from the York aviation discussion document above. Clearly, Manston Airport is not on the UK Govt radar as a key piece of airport infrastructure.
 - ❖ In view of the lack of credible and sustained support from key sectors of the national economy, RTC does not consider that the case made by RSP reaches the standard required to meet the specification of an important piece of national infrastructure and therefore the justification for the granting of a Development Consent Order by the Secretary of State is not met.
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The business case behind the application

This application stands or falls on its credibility in terms of its business case. What the applicant is suggesting is that from a negative base, it can finance and find sufficient business to build an operation that would rival at some time in the future, the second biggest airfreight operation in the UK, East Midlands airport. Is this credible, can it be done, and should it be done?

According to the Department of Transport (DfT) 2018 transport statistics:

- ❖ Heathrow handles 64% of all UK airfreight traffic.
- ❖ East Midlands' airport 12%.
- ❖ Stansted 9%.
- ❖ Manchester 5%.
- ❖ Gatwick 3%.
- ❖ Luton 1%.
- ❖ All other airports 6%.

Air freight. CAA data	2013	2014	2015	% change 2015 from 2014	
HEATHROW	1,422,939	1,498,906	1,496,551	0	
EAST MIDLANDS	266,968	277,413	291,689	5	
STANSTED	211,952	204,725	207,996	2	
MANCHESTER	96,373	93,466	100,021	7	
GATWICK	96,724	88,508	73,371	-17	
BELFAST INTERNAT	29,288	30,073	30,389	1	
LUTON	29,074	27,414	28,008	2	
EDINBURGH	18,624	19,369	19,322	0	
GLASGOW	11,837	15,411	13,193	-14	
PRESTWICK	9,526	12,540	11,242	-10	
BIRMINGHAM	21,067	5,119	7,164	40	
ABERDEEN	7,102	6,278	6,545	4	
NEWCASTLE	3,701	4,450	3,717	-16	
DONCASTER SHEFFIELD	354	858	3,201	273	
JERSEY	2,823	2,876	2,667	-7	
COVENTRY	2,355	2,303	2,259	-2	
GUERNSEY	2,026	2,027	1,911	-6	
BOURNEMOUTH	1,818	1,888	1,565	-17	
Total London airports	1,760,690	1,819,587	1,805,955	-1	78.5% of UK total in 2015
Total All UK reporting airports	2,262,387	2,304,487	2,299,344	0	

Table A – Air freight data 2013-15

CAA data showing air freight at all UK airports 2002 to 2012;

http://www.caa.co.uk/docs/80/airport_data/2012Annual/Table_13_2_Freight_2002_2012.pdf (Tonnes)

Excerpt showing just the largest airports, by air freight, for some of the years:

Airport (air freight in tonnes)	2002	2007	2008	2009	2010	2011	2012	% change 2012 cf. 2011
HEATHROW	1,234,940	1,310,987	1,397,054	1,277,650	1,472,988	1,484,351	1,464,390	-1
EAST MIDLANDS	219,252	274,753	261,507	255,121	273,669	264,595	264,292	0
STANSTED	184,449	203,747	197,738	182,810	202,238	202,593	214,160	6
GATWICK	242,519	171,078	107,702	74,680	104,032	88,085	97,567	11
MANCHESTER	113,279	165,366	141,781	102,543	115,922	107,415	96,822	-10
MANSTON	32,240	28,371	25,673	30,038	28,103	27,495	31,078	13
LUTON	20,459	38,095	40,518	28,643	28,743	27,905	29,635	6
BELFAST INTERNAT	29,474	38,429	36,115	29,804	29,716	31,062	29,095	-6
EDINBURGH	21,232	19,292	12,418	23,791	20,357	19,332	19,115	-1
BIRMINGHAM	13,326	13,585	12,192	13,070	21,605	16,626	19,088	15
PRESTWICK	39,500	31,517	22,966	13,385	12,163	11,846	10,314	-13
GLASGOW	5,041	4,276	3,546	2,334	2,914	2,430	9,497	291
ABERDEEN	3,808	3,434	4,006	3,822	4,211	5,311	6,166	16
NEWCASTLE	1,437	785	1,938	2,597	3,650	3,059	2,956	-3
COVENTRY	4,673	7,469	5,921	2,440	–	564	2,500	343
JERSEY	5,543	4,416	4,332	3,672	3,027	2,634	2,478	-6
GUERNSEY	4,445	3,420	3,309	2,901	2,132	2,194	1,940	-12
BOURNEMOUTH	5,683	253	17	4	304	0	1,121	0
SCATSTA	676	765	723	752	765	808	873	8

HUMBERSIDE	126	144	168	241	600	1,132	621	-45
BELFAST CITY	1,058	1,057	168	138	155	457	581	27
ISLE OF MAN	2,178	533	595	500	404	424	433	2
SUMBURGH	98	104	144	53	268	315	362	15
SOUTHAMPTON	382	297	264	209	116	132	359	172
LEEDS BRADFORD	114	109	334	359	235	194	282	45
DONCASTER SHEFFIELD	–	1,602	1,350	344	216	102	276	171
NORWICH	92	188	239	339	266	330	213	-35
ISLAY	191	272	275	229	213	209	168	-20
ALDERNEY	449	290	323	275	216	182	161	-12
STORNOWAY	767	558	551	475	192	115	154	34
Total for all reporting UK airports	2,193,255	2,325,239	2,282,153	2,047,861	2,324,822	2,297,602	2,302,329	0
	2002	2007	2008	2009	2010	2011	2012	

CAA data. Total All Reporting UK Airports. Air freight. (Tonnes)

Table B – Air freight data 2002 to 2012

If we look at table B, we can see that under previous managements which York Aviation referred to as having ‘high profile, experienced staff members’, in the airport’s last operating year; Manston has never exceeded 33,000 tonnes over a 10-year period. Surely if there had been growth potential, it would have been realised, during this period? In that same period East Midlands airport has grown steadily year upon year. It may be that RSP have the finance and magic management skills, but if we believe that, we must also accept that it is possible for Ramsgate FC to win the FA Cup, because the achievement to rival East Midlands airport is of the same order.

Even if RSP manage to double the turnover in freight handled it would still place Manston in the same position in the table, as it was before its closure.

There is a credibility gap, with many project proposals in Thanet and sometimes with other sectors in the UK, such as Transport Operating company franchises in the rail sector. What tends to happen is in order gain attention and support, extraordinary claims are made in terms of profitability, economic gain and most of all jobs.

The recent Seaborne Freight ferry is a case in point. Here a shell company, directed by individuals with no great track record in maritime logistics, but apparently backed by a substantial shipping company, Arklow, managed to inveigle Thanet District Council, Kent County Council and worst of all the Department of Transport, into believing that it had a viable scheme for operating several ferries out of Ramsgate. The same high-flown rhetoric was used as here, but when scrutinised, it failed to impress and when Arklow shipping finally pulled out of the project, it collapsed leaving its supporters looking embarrassed.

In this application there is not even an Arklow Shipping, an aviation-based equivalent and therefore we must also note the lack of a substantive logistics company and/ or financial institution.

We are assured of financial backing to fund a £300m investment programme, but it is not clear how this is to be achieved. The late great astronomer, Carl Sagan, once said about visitations on earth by alien beings; *'that extraordinary claims require extraordinary evidence to back up those claims'* and it is the same here. As far as can be seen there is not substantive, extraordinary evidence to back up RSP's claims.

If this was an ordinary commercial transaction, buyer and seller would carry out due diligence checks on the financial wellbeing of each other and proceed on the basis of verifiable evidence. In that case there might well be a cloak of commercial confidentiality, but when the power of the state is being invoked to in effect, force a sale from an unwilling seller, such confidentiality falls away and one would expect full and complete disclosure. In our view, disclosure, is a mandatory requirement and any examination of this application should deliver openly and clearly, how any investment is to be made and its sources. If the examination cannot verify the sources of fiancé and who the principals are in this application, it falls at the first hurdle. This has been the crux of the matter from the start.

The future and the price of failure and success

In this submission the Council has taken the target of exceeding the level of business done by East Midlands airport as being under consideration. This is from a standing start or in fact from a negative position, in that the airfield is derelict in terms of commercial activity. In fact, RSP are on record as stating they have a target of 500,000 tonnes of freight to be handled each year, which is almost twice that of East Midlands airport, by 2035, or within 15 years. We have discussed the likelihood of that happening but let's take the long view.

What are the trends up to 2069?

In 1969 we know that logistics on air, land and sea looked like this:

- ❖ The long reign of traditional tramp steamers with service speeds of 8 to 10 kts was coming to an end, but these types of vessel still predominated.
- ❖ Containerisation was in its infancy.
- ❖ Railways were slowly turning over to power braked wagons, but they were still (in the UK) short wheelbase wagons, capable of carrying 10-16 tonnes at no more than 40 mph. The accident at Thirsk in 1969, showed up this weakness, when a train ran amok, because the wagons were unable to ride safely at speeds of 60mph +
- ❖ HGV's were rated around 20/25 tonne max and still predominantly rigid wheel based.
- ❖ Airfreight was operated by piston engine aircraft and 1st generation jets and turbo prop airliners.
- ❖ The internet was unheard of.

In 2019:

- ❖ Container ships carry in excess of 20,000 TEU at 16 to 25 knots.
- ❖ Railways carry block loads of containers or bulk products on long wheelbase or bogie wagons at speeds of up to 75 mph +. Continuous welded rail and advanced centralised signalling systems have increased point to point speeds and cut energy consumption.
- ❖ HGV's exceed 40 tonnes and the motorway system in the UK and much of western Europe is complete, increasing road transport's competitiveness.
- ❖ The use of the internet is all pervasive and is creating new products that require no handling or carriage by any mode of transport.

- ❖ Airfreight has become more fuel efficient and aircraft have become quieter, but not silent, and it is unlikely that jet engines will ever operate in total silence or anything less than ear splitting levels of noise. It may be that even some measure of quietude will not be possible. There are experiments in 'electric' powered aircraft, but how viable they will be in terms of carrying freight is not known.

If we project forward 50 years:

- ❖ Shipping may consist of highly automated autonomous vessels, driven at similar speeds of today, using green energy systems, such as flettner rotors, rotary sails and possibly fuel cell technology.
- ❖ HGV's are likely to be automated and autonomous.
- ❖ Automated warehousing already exists and is likely to become the norm.
- ❖ Much of the air freight market will come under pressure from environmental legislation, unless some form of quiet, green energy is found as a prime mover for aircraft.
- ❖ A reduction in perishable goods to be transported, as improved growing methods mean that seasonal crops cease to be so. For instance, in 1969 the season for strawberries consisted of late June and July. Advanced plastic films used on poly tunnels and selective plant breeding, means that strawberries can be harvested in the UK from May till October. If Europe is included, then the need to airfreight strawberries and other higher value perishable goods is restricted still further. Shipping goods by sea is also capable of filling in the gap more cheaply than airfreight, by managing the ripening of fruit and other similar perishable cargoes in transit.
- ❖ Production and stocking of high-tech components is likely to be done on demand by 3D printing and computer-controlled production from almost anywhere in the world via the internet.
- ❖ Airmail letters are already in steep decline and parcels will only justify being flown if they are of high value.
- ❖ Up to now budget airlines have not carried much freight because it affects their schedules and fast turn rounds. If, however, someone devises a means of rapid, probably, automated turn round, all that extra air freight capacity, will be available at low rates at all the key airports in the UK. Is this more likely than a 500,000-tonne capacity, Manston airport?

In short airfreight is expensive, costly in energy, and likely only to survive in niche areas, and even these may be superseded by new methods. Air freight's selling point of speed and just in time availability, may well cease to feature as being important, as concerns grow over climate change.

Even if IATA's 3% annual growth forecast continues, it may only apply in emerging markets and not in Western Europe, where markets are established and mature.

Air freight is most competitive where the local infrastructure is underdeveloped. Thanet's infrastructure is poor but cannot be regarded as underdeveloped.

RSP's promises of a 500,000-tonne annual turnover, for Manston and 10 to 30,000 jobs, seems highly speculative, if we factor in these possibilities. These forecasts may not be fulfilled, but certainly we cannot expect the conditions as applied in 1969 to continue in the future and this may be a bitter blow to those expecting a jobs bonanza.

What happens if the DCO is granted and yet the airport fails to thrive?

Are we not in danger of creating a 'heads I win, tails you lose situation' for the applicant, by contemplating a DCO in favour of RSP?

It is entirely credible to describe a situation where the DCO is granted and after all the legal formalities are completed, RSP then proceeds to restore Manston airfield, but then finds, X years in the future, that all the factors described previously, have come to pass, and Manston airfield becomes unprofitable or unviable, and seems likely to remain so for the foreseeable future. What then? The land then becomes valuable brown field building land, and very likely to attract speculative investment? In the meantime, the economy and environment of Ramsgate is damaged and becomes more reliant on low value private sector investment and hard to obtain state aid. For RSP however, it becomes a good long term bet, which if real estate prices continue to rise, is an excellent fallback position, which investors can be persuaded to invest their money.

In our previous submission we described the likelihood that the existing tourist trade will decline, and that investment will dry up in the short term. RSP might respond that there will be a jobs bonus, but as we have seen, as automation of the air freight sector gathers apace, by the time any airfield activity occurs, time and technology are likely to have moved on, with little or no benefit to the local economy.

If the DCO is granted; RSP will own a blue chip property care of the tax payer and the community in Ramsgate or Thanet will have no share at all.

In short what is the opportunity cost of investing £300m into the economy of Thanet and are there more secure and better returns available to the community, compared to an airfield?

If we look 50 years ahead and try to invest in skills that will still be current in 2069, is this not the most optimal allocation of resources for Ramsgate and Thanet?

RSP is offering highly speculative jam tomorrow and unsubstantiated promises in the certainty that they will be wielding the spoon in the jam jar, leaving the public interest, jam free.

The Environment and life under the flight path.

There has been substantial correspondence about the effect of an operational airport (cargo hub or mixed use) and this submission will not add to that debate by repeating previous submissions.

We can do no better than endorse the submission from the Nethercourt Residents in Ramsgate, which is attached as an appendix to this document.

Nethercourt is the community most affected by any reopening of the airport, but other parts of Ramsgate will also be affected. Ramsgate is a compact, intensively developed community. Many of the buildings within the town are of Georgian/Regency and Victorian/Edwardian vintage and this is reflected in the status of the Town as a Heritage Action Zone or HAZ. Currently the heritage listing status of various buildings are being reassessed and so far, an additional 9 buildings are scheduled for listing. There are also substantial areas of the town which are zoned as being conservation areas.

There are 20,000 dwellings in Ramsgate. Most, if not all will be affected by noise, because of the compact nature of the Town. RSP's intention to somehow mitigate only those dwellings immediately below the flight path is as futile as it is unjust and is liable to lead to protracted legal processes when deciding which properties do or do not qualify for mitigation. It is possible that a group action if not a class action under the Civil procedure rules might be possible under those circumstances.

The £13.1m allegedly set aside by RSP would be inadequate if widespread mitigation was necessary. RSP may think that they could pick and choose how much mitigation they could accept in order to manage their liability, but they may not be in control of the situation.

To sound insulate $\frac{3}{4}$ or 15,000 properties at around £2,000 per room at an average 6 rooms per house = £12,000 per house, works out at £180m or nearly 2/3rds RSP's budget. Now if such a mass mitigation took place, perhaps not all rooms would be insulated and efficiency savings via economies of scale etc, might, cut the overall cost; but even if a cut in the region of 50% was possible, that still works out at £90m or 7 times the RSP budget. This would not take into the additional cost of insulating listed or conservation area buildings.

It has been put about, by some groups that this is some kind of snowflakes moan fest, because residents experienced aircraft noise in the recent past and did not complain. That was never true, and in any case, this ignores the fact that sound proofing only mitigates noise when someone is inside and does not prevent nuisance outside. It is in effect, trapping residents within their buildings during the day, if RSP manages to increase the number of flights at Manston up to the level they propose in their prospectus.



TABLE C : Ramsgate conservation areas.

As can be seen the conservation areas form a coastal band directly in the flight path and within a mile either side. Sound and vibration mitigation will not be easy or cheap to deliver in these areas.

It is also unreasonable to expect previous standards on noise and pollution to stand for the foreseeable future.

We do not uphold 50 year old practices on smoking, pollution, fire safety or the use of asbestos as a refractory or insulant, so why, when in effect an airport is in effect opened in 2019, should 1969 standards on noise or pollution prevail, merely on the grounds that it has operated that way in the past?

We can offer testimony based on experience, on the likely effect of high noise levels in terms of hearing loss and tinnitus on the average person as there individuals who can testify to the examiner on the level of damage that high noise levels can do to the hearing and balance of an individual, (The Town Clerk is one such person).

In terms of pollution we find the excuse that RSP's agents or contractors cannot access the land to carry out exploratory work to be unconvincing. RTC cannot add to the existing correspondence on pollution should the airport reopen and is content to state that there will be some kind of adverse effect within the local environment but will leave it to others to suggest how much pollution will be involved and in what circumstances.

Conclusion

RTC has come late to the process (excepting its original submission) because the Council was not of one view. That position has changed, in that there is now a majority within the council against the reopening of Manston airfield and that, it is not in the economic or social interest of Ramsgate as a community, for the airport to reopen. Not all members of RTC accept this view, but they are in a minority.

To recap then RTC holds that:

- ❖ RSP have not made the case for being granted a DCO for the purposes of reopening the airport.
- ❖ RSP have not demonstrated sufficient evidence to suggest that Manston airfield is an important part of the national infrastructure.
- ❖ RSP have not demonstrated a compelling and viable business case for reopening Manston airport.
- ❖ RSP have not demonstrated adequate proof of its financial bona fides and by insisting on commercial confidentiality, has instead shown insufficient transparency to justify the granting of a DCO by the secretary of state.
- ❖ RSP's plans for noise mitigation are inadequate.
- ❖ RSP's evidence on environmental issues are weak and lacking sufficient substance.

- ❖ RTC holds that the Nethercourt residents and other groups concerned with the granting of the DCO have delivered sufficient evidence to suggest that RSP have not made the case to justify the granting of a DCO to overreach the substantial economic, social and environmental reasons, to refuse this application in the interests of the community, which is most affected by this application.
 - ❖ The lack of attention to connectivity within this application is also a major weakness, but again RTC is content to leave it to the other concerned organisations to argue this point. Thanet's transport infrastructure is particularly poor, and the addition of an airport only makes the situation worse.
 - ❖ Ramsgate Town Council has found this whole process highly divisive and has created polarised social groupings, who will have to reconcile their differences with each other, whether or not this application succeeds and fails. RSP has been extremely careless of community cohesiveness and somewhat intolerant of dissent. Even if by some mischance, the application is granted, the damage to community cohesiveness and the general well being of Ramsgate and Thanet in the last 5 years, is nothing short of catastrophic for a community facing severe economic challenges.
 - ❖ Finally, only the RSP DCO application is under examination here and it is not reasonable to justify the DCO, because of a dislike of the planning application from SHP. Whatever the merits or demerits of the SHP proposals may be; they will be dealt with by a separate process and the examination should not involve itself with a separate planning matter.
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This submission is has been complied by Rita Burns, Ian and Hilary Scott, David and Elizabeth Green on behalf of 250 residents of the Nethercourt Ward in Ramsgate.

These 250 Nethercourt in Ramsgate residents have joined NAG to oppose RSP's plans for a freight hub. They met at short notice to express their concerns.



Residents are pleased that the inspectors are also concerned to establish precisely the likely impact of RSP's plans whether it is 18,000 or 83,000 movements a year, night flights or no night flights, preferred flight paths, QC count of planes. ***RSP's documentation is far from clear on these points.***

Lack of Consultation

As Thanet District Council has informed you, there were severe deficiencies in RSP's consultation process. As the nearest community to the airport we were not informed directly of the only consultation meeting in Ramsgate at The San Clu and only one or two attended. Those that did attend were shocked by the aggression and bad language they were met with from RSP principles. Since the consultation the proposal has become even more confusing, with the documentation changing and increasing in volume.

We are very worried that pro-airport TDC councillors will put pressure on officers to play down the impact of RSP's proposals on Ramsgate residents in their local impact report. This is borne out by Mr Bayford's letter to RSP telling them to ignore TDC's Statement of Statutory Consultation which was highly critical of RSP's consultation saying it was flawed & unrepresentative but not explaining how, Mr Bayford had no standing to do this and unfortunately RSP took notice of his letter which they shouldn't have.

There is also the effect that removing Manston, a brown-field site, from possible house building will have on the local plan. Pro-airport councillors have gone against officer's advice and voted for a local plan that puts a moratorium on house building on Manston for two years. This will put pressure to build on Greenfield sites such as farmland & local greens. The removal of these open places further erodes the quality of life for local people.

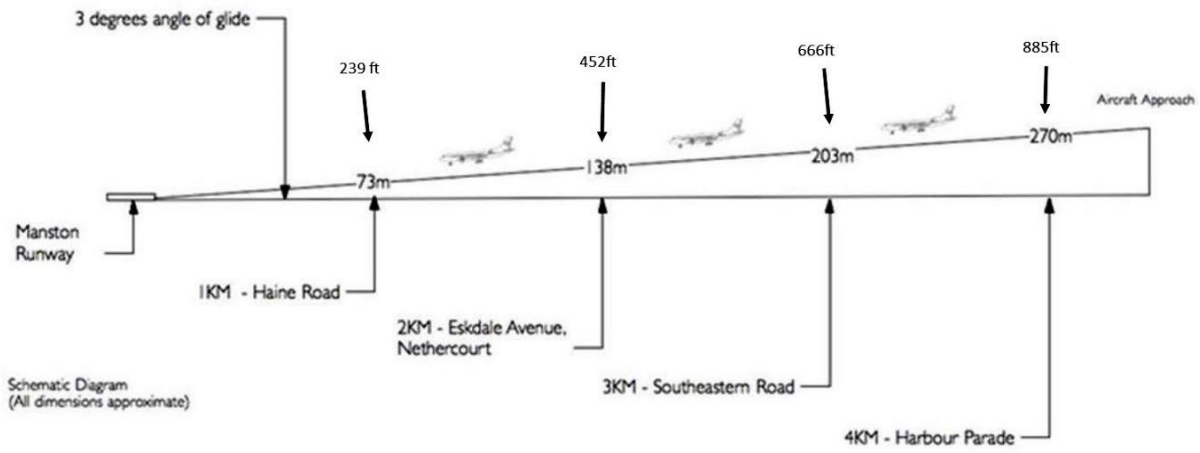
As RSP seem to have gone out of their way not to inform people in Ramsgate who live under the flight path of their plans we are still meeting many people who have no idea of the massive scale of RSP's proposal.

Topography

We want to emphasise that the Nethercourt estate and its 800 properties is the nearest community on the old airport's flight path. It is between 1.5 and 2.5 kilometres from the end of the runway, built on a steep rising slope away from the runway.



Our experience is that due to prevailing wind conditions 80% of landings were over our properties at a height typically of 80 to 150 metres over the whole estate, often much lower



We believe our homes are uniquely vulnerable to low flying freight aircraft making Manston highly unsuitable for the proposed use.

Superimposing Ramsgate's footprint on maps of the flight path of other functioning airports illustrates this. .





It can be seen that in all cases the major landing flight path is largely over open fields.

Noise

RSP's suggestion that few residents will be affected by noise is in contradiction to the wealth of factual material available which sets out the real noise nuisance that was experienced by local residents when Manston was operational as a commercial cargo airport. The reports commissioned by TDC from Bureau Veritas in 2010 and Parsons Brinkerhoff in 2012, to assess how many residents would be affected by noise if scheduled night flights were to be introduced, make it clear that noise nuisance is not confined to a small area within 2km of the airport. Indeed, Bureau Veritas predicted that the population within the 85 dB (A) SEL contour affected by a flight departure to the east over the centre of residential Ramsgate would be "up to 30,903 [people] for the Boeing747-400".¹⁸⁵ This is the runway that has been – and will be – used over 70% of the time. It seems RSP are trying to hide unacceptable noise levels behind averages. We wonder how RSP could create any meaningful noise contours without an accurate ATM count. It is also very doubtful an accurate Local Impact Report could be produced with the conflicting and incomplete information in the DCO application.

Direct evidence exists of the noise impacts of aircraft operating at Manston before it closed 4 years ago. The relevant noise monitor was situated in Chapel Place (Clarendon House Grammar School) in the centre of Ramsgate where the preferred flight path had landing aircraft at 200m above ground as compared to 150m on average for Nethercourt. We attach some of the results

from this monitor as reported to KIAAC (Kent International Airport Advisory Committee). 90db was typical, 100db not uncommon.

We have produced a table of some those results:- **See Appendix A**

**Noise Measured at the Station at Clarendon House Grammar School, Central Ramsgate,
Extracted from the minutes of KIAAC, Kent International Airport Consultative Committee**

Readings taken at Clarendon School roughly in the centre of Ramsgate 3.5km from the end of runway.



Year	Average SEL Lmax dB(A)
2003	100.7
2004	96.80
2005	97.34

We understand and agree with more recent thinking that with noise above a given threshold it is the number of incidents day and night that matter rather than average noise levels.

Public Safety Zones

RSP should have considered whether Manston Airport needs a PSZ because they state that the potential number of ATM's is 83220 by capacity and they also state they do not want limits or a cap on the number of flights.

Riveroak's Major Accidents and Disaster Assessment and Mitigation Plan (TR020002/APP/5.2-3) fails to address the following risk factors adequately –

- (i) the proximity of Ramsgate (population 40,000) to the runway
- (ii) the number of schools under the flight path
- (iii) the height of the aircraft over Ramsgate
- (iv) the safety record of cargo aircraft at Manston Airport
- (v) the lack of capacity at local A&E for dealing with a major incident

A proper risk analysis would conclude that Manston should not be given planning permission as an airport let alone accorded a DCO.

Ramsgate is not 4km from the runway as Riveroak contends. (para 6.6, Statement of Reasons TR20002/App/3.1) The built-up area currently begins 1.3km from the runway and directly under the flight path. It is 4.5km across Ramsgate from the outer edge of the Marina to the runway. The planes line up over the Grade 2 star listed Clock Tower and descend across the town. There are 4 schools directly under the flight path.

The Manston Green development has planning permission for 785 homes, is 500m from the end of the runway and directly under the flight path. It was awarded £2.5 million from the Housing Infrastructure Fund this year. Some homes and the proposed fuel farm in Cliffsend are within 150m of the end of the runway.

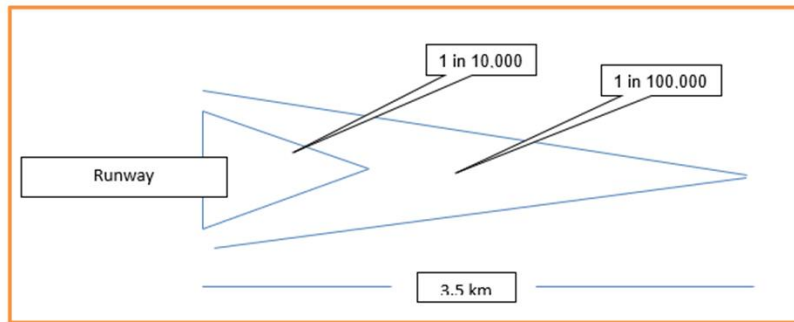
"Aircraft will finally descent (sic) at 52m for each kilometre travelled, such that at the Marina, aircraft would be 235m above the aerodrome level (54m), or 289m above sea level." (p14, London Manston Airport, Aircraft Noise Assessment and Mitigation Report, June 2003)

Schools on Flightpath	Number of Pupils	Distance to Runway	Height of Aircraft Overhead
Chilton Primary School	422	1.8km	117m
Ellington Infant School	204	2.5km	135m
Christ Church Primary	253	2.75km	153m
Chatham & Clarendon	1372	3.5km	212m

Grammar

SEL readings from the noise monitor 3.5km from the runway consistently recorded levels well in excess of 90dB and up to 100dB .

The area of a Public Safety Zone corresponds to the 1 in 100,000 individual risk contour for an airport. These tend to be two triangular shapes extending out for 3-4 kilometers from either end of the runway. The landing PSZ tends to be a longer triangle than the take-off triangle.



The last Masterplan done for Manston in 2010 acknowledged that its PSZ should have been done in 2006. It was not. But by looking at other airports and knowing the pattern of aircraft take off and landings at Manston it is possible to gauge the likely shape of the PSZ that would affect Ramsgate.

The number of variables to be taken into consideration when determining the risk contours is:

- Annual traffic movements
- Maximum Take-off Weight Authorized (MTWA)
- The crash consequence model includes population density
- The number of crashes per million movements done by using crash rates for each aircraft class
- The crash location model for large and light aircraft

The 1 in 10,000 contour would most likely be a triangle extending a 1-1.5 km beyond the end of the runway. It would include a number of residential streets in Nethercourt including Kirkstone, Whinfell, Drybeck, Kentmere Avenues and part of Windermere Avenue. “The Secretary of State wishes to see the emptying of all occupied residential properties, and of all commercial and industrial properties occupied as normal all-day workplaces, within the 1 in 10,000 individual risk contour.” These residents would need to be moved.

The 1 in 100,000 contour, and thus the PSZ, would extend approximately 3.5-4km from the end of the runway. It would cover the whole of the Nethercourt Estate, and a substantial area of Ramsgate right down to the harbour and including part of the town Centre. Three schools, Clarendon House Grammar School, Christ Church Primary School and Ellington Infant School, are within the 1 in 100,000 risk contour.

Nethercourt residents are extremely anxious with RSP's vagueness regarding aircraft movements and the likely consequences of the 83,000 pa capacity no limits or caps with a big night time quota.

The 1 in 10, 000 area would also include the, as yet unbuilt, estate to be named **Manston Green**. This new estate of some 900 dwelling, given planning permission prior to the consultations, isn't even mention in the 10500 pages of the DCO submission and has not even been considered for compensation purposes but lies well within the PSZ for a busy airport.

Theoretical calculations regarding Noise and Safety Zones point to the devastation a freight hub would impose on Nethercourt residents. I'm sure other representations you will have received will quote other calculations regarding health and environmental impacts.

Safety Record

When Manston was the UK's sixth largest cargo hub, it had only 435 flights a year and yet we had incidents that very nearly resulted in major loss of life.

Examples include:

1. In August 2010, a KAM Air plane "struck its tail on the runway and the grass surface beyond the runway before becoming airborne during take-off from Manston Airport (United Kingdom). Investigations of this serious incident by the United Kingdom concluded that there were serious deficiencies with the operational control of the DC8 fleet of Kam Air." (para 14, COMMISSION REGULATION (EU) No 1071/2010). Riveroak proposes 70% of flights will take off over Ramsgate.
2. In 2012, in a vortex incident in Southwood Gardens (2.5km to runway), the entire roof fell into a neighbour's garden narrowly missing her. Had this happened at nearby Ellington Infant School during playtime, significant loss of life would have resulted?

Riveroak's proposal of an airport capable of 83,000 ATM's per year with no limits or caps will make teaching impossible in our schools and poses a major risk to public safety and public health in Ramsgate. Not to mention students having disturbed sleep due to night flights

Complaints

Given this level of noisy events it is unsurprising that the airport received many complaints. The minutes of KIACC document the extent of these.

Unsurprisingly, these complaints came from those living under the flight paths, with the majority coming from Ramsgate.

In Manston's case, we do not need to rely on theoretical calculations, we have resident's actual experience of living under the low flying aircraft. As the noise monitor shows, generating 95-100db. Bear in mind that previous usage at Manston was very much less than that predicted by RSP.

Table of Complaints received by KIACC, due to Manston's previous operations

	June-August 2000	Dec 2000 - Feb 2001	June-August 2001	Dec2001 - Feb 2002	March - May 2002	June - August 2002	March - May 2003	June - August 2003	
Herne Bay	7	37	68	123	79	19	89	27	
Ramsgate	222	412	289	573	226	186	101	66	
St Nicholas at Wade	35	8	12	3	2	2	6	10	
Westgate		32	62	28	1	40	33	67	
Total	264	489	431	727	308	247	229	170	
	Dec 2002 - Feb 2003	June -July 2003	Dec 2003 - Feb 2004	Feb - April 2004	June - July 2004	Nov - 2004 - Jan 2005	Feb - April 2005	Nov 2005 - Jan 2006	Oct - Dec 2006
Herne Bay	2	17	7	20	10	10	8	4	3
Ramsgate	167	28	130	140	139	187	227	1	32
St Nicholas at Wade	1	6	3	1	5	6	5	3	4
Westgate	51	44	60	51	63	82	164	9	56
Total	221	95	200	212	217	285	404	17	95

Nethercourt Residents Experience under the Manston Flight Path

I will quote some of Nethercourt resident's experience of living with flights from Manston when it was operational.

Mr & Mrs H said, "When flights were running our house is no longer a nice place to live - . Even with windows and doors closed it is impossible to hold a conversation, watch tv, make a phone call etc. when planes go over. Our children were so scared of them they used to run indoors screaming as soon as one approached. The garden was a complete no-go zone during times when the pilot training took place."

"Vortexes are common and the house next door but one to us had the roof damaged."

Mrs B said, "Cannot have a telephone conversation - planes so loud, Cannot hear the television, Stops all activities in the garden because of the noise, Car alarms constantly going off from the vibrations."

Mr M said, "and the planes were so low and loud that you had to stop a conversation because the noise drowned out any sort of conversation or telephone call. There were always droplets of fuel exhaust visible on washing so you can imagine how much invisible pollution we were inhaling. Then there were these constant vortexes from the back throttle of the breaking system that were so strong that they would set off car alarms."

Mr L said, "There is nothing more disturbing than waking from deep sleep to the sound of a screaming engine, or engines 200 feet above your bed in the pitch black of night It's not fun living with unexpected 100 db noise at any time of the day...or the night. It scares our dog, the birds, and it scares our visitors. It shakes the plates hanging on the walls. It brings fear into my heart as it approaches, and fear as it passes, for another one will fly over at a time of its choosing, maybe I'll be sliding into unconscious sleep, or in the middle of a dream, any time is the wrong time, night, or day. To even contemplate night flights for Thanet at Manston is inhumane."

Mrs L said "I remember before the planes stopped after the last effort to revive the badly positioned airport. It was horrendous. The noise was such you could not be outside without covering your ears, the planes screamed overhead, so very close. I heard the whoosh after they had past and felt sometimes a light dusting of spray of what I can only assume was spent fuel. My parents vegetable garden had produce that when washed left a greasy film on the water. The windows were never clean. It was not pleasant at all and got us all down sometimes. However the worst part was if one came roaring over the house in the night."

Mr P said "Planes were horribly noisy when they passed over our house. When it became a passenger airport, noise remained a problem (even with more modern planes): halting conversation, drowning out tv, regularly setting off car alarms and frightening my young children. I was regularly woken up every night for months between 11pm-1am by a late arriving plane. Night waking and lack of sleep takes a toll on our health and wellbeing."

The M Family said "When the airport was operational the noise from the freight planes was horrendous causing the windows and furniture to vibrate violently even though we had fitted triple glazing and extra insulation in the attic, and all this was worse at night. Sitting and eating in the garden was impossible, the vegetables were covered in aviation fuel and the water in the birdbath turned red."

Mrs P said “when the airport was open it had a noticeable impact on my health. I live immediately under the flight path, the house would shake and conversation had to stop, not just for a brief moment but during the slow build up as the plane approached and then the sound of it landing. Despite limitations imposed on the airport planes often flew at night, being woken in the night, resulted in several hours of lost sleep, not just a few minutes. This left me tired and lethargic throughout the following day. In the final weeks of the airport night flights became frequent and I found it seriously impacted my health and wellbeing, dreading the sound of an approaching plane.”

Ms C said “I remember when I was younger the horrific noise, pollution and damage to properties (roof tiles flying off houses directly under the flight path) cargo flights would cause, especially at night. The planes were huge, and quite frightening to suddenly be awoken in the middle of the night by one, or several throughout the night. I strongly believe that as a direct result of these frequent occurrences, I am much more sensitive to loud noises and have suffered with [Redacted] from a young age too. This is not good for health, valuable childhood education or mental wellbeing.”

Mr and Ms N said “During the time that the airport was operational I was diagnosed with Asthma, which I’d never suffered from previously. After the closure of the airport my asthma has disappeared completely, so I no longer need any medication for it.

Our quality of life diminished after the RAF left Manston and it became a commercial airport. We were no longer able to enjoy our garden with our children and grandchildren because the noise was unbearable. The noise of the vortex after a plane went over was extremely frightening to our grandchildren who couldn’t understand it. We felt unable to invite friends around because of the noise.

The noise wasn’t just awful outside; indoors it was just as bad even with windows and doors closed. We were always turning the television up and down, which was the only way to hear it. Telephone conversations caused the same problem.

Night time flights were unacceptable, we were constantly being woken and then unable to sleep. This caused a problem with work as I could not concentrate properly due to a lack of sleep. There was very often a sickly smell of aviation fuel. This also left a film on our pond and bird bath and therefore was not doing wildlife any good. Washing was also prone to dirty marks from pollution from planes.

I dread to think of the pollutants we were ingesting from the vegetables grown in our garden, we were able to wash the outside, but just what was inside them!”

Mr & Mrs D said “Concerning Manston Airport, being on the flight path we would find it very unsettling for the airport to reopen and be used on the scale of 24-7 a year.

There would be no peace. The last time Manston was operational we began to notice a change in health, this was due to the effects of fumes in the air. We were unable to sit in our garden due to the smell of fuel and the noise. The vibration was bad and we felt our bungalow shake when a plane came over. We were worried a chimney pot would shake loose and crash through the roof. Watching television or trying to listen to the radio was intolerable. To have flights come back on the scale proposed would be nerve racking.

Ms P said “How on earth can I give any concrete “evidence” of the earth shaking, the spent aviation fuel dirt on my window frames, sleepless nights, etc. etc. I can only re-submit the original objections but what good is that likely to do if it was ignored before.”

Mr H said “When Infratil tried to introduce night flights I was horrified and attended meetings to oppose their plans. While the airport was open I never had an objection to its existence at its then level of operation as a regional airport supporting general aviation and limited commercial traffic. I am however totally opposed to the plans proposed by RSP to turn it into a Cargo Hub. Since its closure we have enjoyed nights of uninterrupted sleep and days free of noise and air pollution.

We have a bird bath in our garden which my wife keeps topped up with fresh water for the birds. While the airport was operational we frequently noticed a red tinge to the water with a greasy film on top. Since its closure the water remains clear with no such problem.”

Mr P said “When the planes came over my whole bungalow vibrated & the roof rattled. You could not hear the TV, hold a conversation or make a phone call. The pollution from the planes turned my plants brown, windows & doors would be covered in black residue. It made me feel sick. If it reopens it will be 100’s of times worse. It is making me ill just thinking it may re-open.

Ms G said “I live on the Nethercourt Estate and directly under the flight path. When Manston was previously in operation the noise and air pollution were unacceptable then and that was when the number of flights were minimal. I live at the west end of the estate nearest the runway and the planes were so low and loud that you had to stop a conversation because the noise drowned out any sort of conversation or telephone call. There were always droplets of fuel exhaust visible on washing so you can imagine how much invisible pollution we were inhaling. Then there were these constant vortex from the back throttle of the breaking system that were so strong that they would set off car alarms. Although there was supposed to be NO NIGHT FLIGHTS the owners still broke the section 106 rule and supposedly paid a fine to the council but the fine was obviously not a big enough deterrent and they continued whilst the residence bore the brunt of the inconvenience so there was no real incentive for the owners to uphold 106 agreement. These new proposed owners would increase all these issues simply by the number of flights they intend to run and our sleep would be constantly interrupted nightly and our health suffer measurably. There has always been a safety issue as there is no safety zone around the airport and no safety regulations for the residents should there be an emergency situation. The estate is the closest to any runway where a cargo hub is in operation in the UK. There have been safety issues in the past where I have witnessed a very low flying aircraft fractionally missing the tower block of flats known as Staner Court because it was off course and although this was reported and photographed in the local paper I cannot find any reference to it now possibly as the local paper owners are in favour of the cargo hub. Something that should be researched.

I am in constant concern that should this awful arrangement be allowed to proceed then the risk to the residents will be greatly increased with no real strategy in place for any emergency with the likelihood of the estate being wiped out if a plane overshot the runway. WE ARE THAT CLOSE.”

Mr & Mrs M said “We have lived in [REDACTED] in Ramsgate for 28 years so were residents when the airport was open for civilian use. Even with the very small amount of flights it caused a major disturbance to us. We are in line with the runway & planes flew directly over us. Because of the geography planes were still very low over our house & the noise and vibration was horrendous. The noise of an aircraft flying over just after take-off meant that, even in the house, you could not hear the television, talk on the phone or hold a conversation. Our house is an older property & the vibration from the planes was so bad it literally rattled the slates on the roof & we

were constantly worried about structural damage to our property. There were times we felt like the planes would crash on our house.

If you were sitting in the garden it was even worse. As well as the noise, which was even louder in the open, there was the pollution that you could smell, taste and feel an oily residue on your skin. We were breathing this in so there is an obvious health issue. The oily residue also covered anything left in the open. Many times planes would be left on the runway with engines running for hours & this all added to the pollution & noise nuisance.

There were occasions when flights would arrive late at night & these woke everybody up. My wife works & has to get up at 5.00am and if her sleep is disturbed she will not get a good night sleep which will make work very difficult for her.

If the ExA & PINS recommend this proposal by RSP it will stop anyone in Ramsgate enjoying their gardens, local parks & beaches. This is without the health problems such a project so close to a town would cause. In short residents will not be able to live normal lives any more.

Mr H said "I wonder how many people remember when debris from a plane crashed through the roof of a property in Nethercourt, it happened, but was quietly dealt with by the powers that be. No mention of the incident since, it's as if it has been deleted from popular memory.

When the R.A.F. were stationed at Manston the bulk of the flying time was finished by 21:00hrs. With only the occasional "Night Flight".

I have lived in several areas of Ramsgate over the years and I must say that whenever there were flights from Manston there was no missing them. Windows have been known to rattle. The larger planes you could physically feel them when they passed overhead.

The flights at night either frequent or not would act as impromptu wake up calls, whether or not you needed one, creating broken sleep patterns. In the daytime you would have to pause, mid conversation, while a plane passed overhead. If you took a telephone call, and then a flight came over, you would be drowned out by the noise; my son has often asked "what was that". When he would come to visit with my grandchildren they could not believe how low the planes flew and that you could clearly read the plane I.D. number and see the landing gear.

Whenever there was a pilot training programme, the Bump & Jump flights were relentless, round & round they would go, I suppose it was giving us a feel for how busy the airport could be, and to be honest, it was not at all pleasant. The larger the plane the greater the nuisance, only the small "Fokker 100" planes that operated for a short period were anywhere near acceptable.

Apparently back in 1993 the D.O.T. examined runway capacity in the South East and found Manston unsuitable for development due to its proximity to the town of Ramsgate.

What has changed, neither the Airport nor the Town have moved.

This whole situation is like having the "Sword of Damocles" hanging precariously over our heads.

Mr & Mrs C said "We live DIRECTLY under the flight path, we have experienced the deafening sounds of these very large Cargo Planes, it is bad enough in the day when you cannot hear yourself speak, but when you are woken up by the noise at night and you cannot get back to sleep this becomes very stressful and over time results in ill health.

The smell of the aviation fuel when these planes fly over and other particles that come down is very strong and can last for a few hours even when the plane lands the smell of the fuel is very strong which is a health hazard to people with breathing problems,

I have had soot like particles on my washing and the garden plants. (Not good for the environment.) The vibration that is given off shakes the bungalow.

These planes fly dangerously low over this residential area".

Mr & Mrs M said "We have lived on the [REDACTED] for 32 years, the airport was then RAF Manston. We had no issues with the RAF until the 1990's when began a gradual running down of the RAF base and the increase of commercial cargo, in 1998 the base was sold in its entirety for

commercial use to the Wiggins Group. No planning permission was ever obtained and it operated on a 106 agreement (of uninterrupted use).

During that time until the closure of the airport in 2014, our whole family (5 adults) had endured cargo planes (that were banned from all UK airports), emergency landings, pilot training (constant taking off and landing all day from British Airways and KLM), unbearable noise, keeping windows closed (in the height of summer months), pollution causing migraines and sleep deprivation, planes landing at unscheduled times (usually in the early hours of the morning, for example 3am). As we were now under the flight path for landings and take offs and at the end of the planes' descent before it hit the runway, from the upstairs windows you could wave to the pilot in the cockpit, they were that low over our houses.

What RSP are proposing would be a total devastation to our lives, our homes, our health and the area that we live in, Ramsgate. This proposal if granted, compared to what we've endured over the years, would be catastrophic.

CONCLUSION

RSP seem to be manipulating ATMs in their DCO application to suit their own agenda, keeping them high to justify an NSIP but then later keeping them low to avoid having to produce an accurate environmental report based on the true capacity of their plans for Manston, avoiding creation of public safety zones and having to pay blight and compensation claims.

Looking at all the information and reports commissioned over the years they all state there is very little possibility Manston will ever be viable in the long term. There is no doubt that if it had not already been a military airport no one in their right mind would suggest building an airport so close to a big town. Is it worth subjecting 40,000 residents to the noise and pollution such a project proposed by RSP would cause and the effect it would have on their lives and health for what, at best, is a highly speculative proposal with no real evidence to support need or viability. The effects of noise & pollution from airports and aircraft is well documented and we understand other groups are sending in reports so we have not duplicated them here.

An NSIP is meant to be a balancing act of the public need and effects on local residents. We have tried to show the negative impact of what was a very small operation at Manston (during the time it was operational as a commercial airfield) on local people's lives. These are real facts from people whose lives were affected in the real world.

Full names have not been included purely for Data Protection reasons.

We have names & address of all residents whose comments are in this submission & if they are needed we can forward them to the ExA on request

APPENDIX A

Date	Time	SEL Lmax dB(A)	Date	Time	SEL Lmax dB(A)	Date	Time	SEL Lmax dB(A)
2003			2004			2005		
23.12.03	21.46	101.9	07.01.04	11.50	102.6	02.02.05	18.04	104.40
12.12.03	18.21	101.9	24.01.04	12.41	102.7	27.04.05	21.46	102.10
15.12.03	19.05	101.5	06.01.04	13.08	101.5	14.05.05	8.19	101.80
27.12.03	11.2	101.0	16.01.04	21.32	101.6	17.03.05	7.45	101.80
25.12.03	12.57	101.4	20.01.04	18.52	100.4	06.03.05	7.10	100.40
22.12.03	11.18	101.2	09.01.04	20.34	102.9	16.05.05	19.50	100.20
28.12.03	8.54	101.6	13.01.04	16.53	100.9	16.05.05	8.50	98.00
20.12.03	11.57	100.4	17.01.04	17.22	99.8	01.04.05	12.35	97.80
26.12.03	12.06	101.7	05.01.04	13.12	99.7	18.03.05	7.37	97.60
22.12.03	21.37	100.6	19.01.04	13.39	99.6	18.05.05	8.53	97.40
13.12.03	19.59	100.9	28.01.04	11.27	99.2	30.03.05	14.03	96.50
11.12.03	17.09	99.9	12.01.04	15.56	99.6	01.04.05	19.52	96.20
22.12.03	11.59	100.1	27.01.04	14.29	98.9	30.03.05	21.40	95.60
10.12.03	11.59	99.3	01.01.04	10.52	99.7	31.05.05	14.54	95.40
31.12.03	13.06	98.7	21.01.04	12.02	98.1	06.03.05	19.16	94.50
21.12.03	11.59	99.6	13.01.04	12.58	98.9	23.05.05	15.02	93.80
		1611.7	27.01.04	17.13	98.8	03.04.05	21.42	93.70
Average		100.7	15.01.04	11.31	98.9	07.05.05	17.57	93.40
			11.01.04	9.20	99.10	01.04.05	12.15	93.30
			07.01.04	20.19	107.10	30.03.05	20.57	92.80
			25.01.04	20.14	105.50			
			07.01.04	18.35	105.90			1946.70
			20.01.04	20.34	100.30	Average		97.34
			23.01.04	15.51	98.40			
			02.01.04	15.47	98.60			
			26.01.04	13.09	96.60			
			17.01.04	20.45	96.00			
			14.01.04	12.34	96.50			
			31.10.04	17.09	102.10			
			03.10.04	7.2	97.10			
			30.10.04	20.08	95.80			
			28.10.04	20.44	95.00			
			21.11.04	9.19	95.00			
			16.11.04	16.55	93.60			
			18.11.04	13.45	93.20			
			07.09.04	12.56	92.60			
			30.09.04	10.23	92.40			
			01.09.04	20.04	91.70			
			16.10.04	15.41	91.40			
			29.11.04	10.59	90.50			
			19.09.04	21.34	90.10			
			17.09.04	14.57	90.10			
					4743.30			
			Average		96.80			