

**MANSTON AIRPORT DEVELOPMENT CONSENT ORDER EXAMINATION
SUBMISSION FOR DL8: WRITTEN SUMMARY OF ORAL SUBMISSION PUT AT ISSUE
SPECIFIC HEARING 6, 05/06/19 (PM), BY JASON JONES-HALL OF LOCAL
BUSINESS AND INTERESTED PARTY, FIVE10TWELVE LTD**

1. As the ExA is aware, Five10Twelve Ltd submitted a set of Noise Contours produced by the CAA's Environmental Research and Consultancy Department (ERCD), together with the CAA's Technical Note relating to these Noise Contours as an Additional Submission ([AS-120](#)).
2. These documents were prefaced by an explanatory note and the CAA's ERCD Charter, submitted 24 hours earlier, ([AS-108](#)).
3. These noise contours were commissioned from the CAA and financed entirely independently by Five10Twelve Ltd for the following reasons:
 - 3.1. The Noise Contours produced to date by the Applicant have been severely lacking in detail, both in terms of detail provided in the Contour Maps and detail and transparency regarding the underlying data used to produce their Contour Maps, for example:
 - 3.1.1. The Applicant's original Noise Contour maps produced in Figures 12.4-12.13 of its *Environmental Statement Volume 4: Figures*, ([APP-042](#)), show very little detail with regards to actual noise contours. The daytime contours in Figure 12.4, for example, show only the LOAEL of 50dB, SOAEL of 63dB and UAEL of 69dB.
 - 3.1.2. Given that it is standard practice for the CAA and others to produce Noise Contour Maps at 3dB intervals, it can only be assumed that the Applicant has specifically chosen to either delete all other Noise Contours from its own maps, or else the Applicant briefed its

consultants, Wood Group, to restrict Noise Contour to the more extreme instances.

- 3.1.3. The effect of this as regards public consultation is that it gives the false and misleading impression to the public and other statutory consultees that the vast majority of local residents, schools and businesses fall within a 50dB Noise Contour, since no other Noise Contours are presented between 50dB - 63dB.
 - 3.2. Five10Twelve Ltd has previously expressed concerns regarding the validity of the Applicant's own Noise Contours and the underlying data to produce these Noise Contours, noting also concerns raised by numerous other parties, in our previous submissions, notably our Extraordinary Request submitted at Deadline 5, ([REP5-074](#)), at paragraphs 6 - 6.7.
 - 3.3. Our Extraordinary Request submission, ([REP5-074](#)), also included at paragraph 6.5 a request that *"there should be an independent review and re-issue of the noise contours"* and at paragraph 6.5.3 that the *"Environmental Research and Consultancy Department (ERCD) of the CAA (should) produce independent, accurate noise models ... showing a wider range of contours consistent with the ExA's line of questioning"*.
 - 3.4. It is our understanding, confirmed by the ExA as early as the Preliminary Hearings, that it is not in the ExA's remit or purview to commission independent reports or evidence, rather that the ExA relies on evidence as submitted by the Applicant, Interested Parties and Affected Parties.
4. In our experience and understanding, the first and most important question that any local resident, business or Interested or Affected Parties may have regarding the proposed development is *"does my property lie under the flight path and how will noise and other factors affect me?"*. Noise Contour maps are therefore a crucial tool in helping to answer this question.

- 4.1. The location of the Applicant's original Noise Contour and Flight Path diagrams was not made obvious or easily findable by the wider public during the original consultation or at any stage during this examination. In fact, these diagrams were buried within the pages of a document marked "5.2-4 *Environmental Statement Volume 4: Figures*", ([APP-042](#)) - one of 26 volumes of the Applicant's original Environmental Statement.
- 4.2. Our original attempts to locate the Flight Path and Noise Contour diagrams, pre-examination, we contacted the Applicant by email on 20/8/19 making enquiries to clarify this issue and made a request on 31/8/18 for hard copies of the Application Documents. A chain of multiple emails with the Applicant ensued over the next two weeks in an attempt to secure these documents, during which we were told that hard copies of the Environmental Statement - where the Flight Path and Noise Contours could be found - was only available at a cost of £500. This evidence will be submitted to deadline 9.
- 4.3. On receipt of the Noise Contour Maps from the CAA's ERCD, we also received KML formatted files, which can easily be imported to Google Maps and shared publicly, allowing anyone, anywhere to locate exactly where there home or business is located within each Noise Contour. This service and functionality was never made available during the public consultation.
5. We have submitted the Noise Contour Maps we commissioned from the CAA, complete with all underlying data and brief, without redaction and without comment in order for the ExA to make its own findings and draw its own conclusions, although we reserve the right to draw attention to key findings of our own in later submissions.