

NETHERCOURT ACTION GROUP REG: 20013745

Having received copy of Thanet District Council (TDC) Local Impact Report (LIR) submitted to the Planning Inspectorate's (PINS) examination of Riveroak Strategic Partnership's (RSP) application for a Development Consent Order(DCO), Nethercourt residents believe the LIR does not adequately describe the threatened impact of the proposal on Nethercourt in a number of areas. These include:
(The items in RED throughout this submission are Nethercourt Action Group comments on the opinions expressed by TDC in their LIR submission)

Compliance with existing Planning Policies

TDC make the point that there are existing planning policies relating to the site that should be complied with. These include the National Policy Framework, the "Saved" policies of the Thanet District Local Plan 2006 and that some weight can be given to the emerging Local Plan to 2031, currently under examination.

Local Plan "Saved" Policies

1. Demonstrate compliance with the terms of the current agreement under section 106 of the Town and County Planning Act 1990 or subsequent equivalent legislation.
2. Any application for the purpose of increasing aircraft movement in the air or on the ground, must be supported by an assessment of the cumulative noise impact and the effectiveness of mitigation measures in order to minimise pollution and disturbance. The acceptability of proposals will be judged in relation to any identified and cumulative benefits of the proposals.
3. An air quality assessment in compliance with Policy EP5 to demonstrate that the development will not lead to a harmful deterioration in air quality. Permission will not be given for development that would result in national air quality objectives being exceeded.
4. Any new development which would generate surface traffic must meet requirements for surface travel demand in compliance with policy EC3.
5. It must be demonstrated that new development cannot contaminate groundwater sources or that appropriate mitigation measures will be incorporated in the development to prevent contamination.

The draft Local Plan paragraphs 1.38-1.45 explain the current status of the Manston Airport in the context of the plan. **TDC has concluded from evidence collected that airport operations at Manston are very unlikely to be financially viable in the longer term and almost certainly not possible in the period to 2031. They therefore have withdrawn the designation SP04 in the saved policies from the previous plan because they cannot justify it on the evidence they have.**

However TDC recognises the Manston DCO process and has not allocated the site in the draft Local Plan.

However, the Local Plan inspectors have not accepted this and have asked TDC to come forward with a policy statement that considers the impact on the plan of either decision in favour or against the Manston DCO. This is due to be considered on the 16th July.

Doubts concerning the Adequacy of the Application/dDCO

TDC state that there remains significant uncertainty about whether the socio-economic benefits from the proposed development, in terms of job creation, attract significant weight in support of the proposal, with these benefits potentially overstated in section 13 of the ES.

TDC suggests that the proposed commercial development of the Northern Grass does not appear to be functionally required for operational purposes of the airport. TDC say that there is space on the allocated Manston Business Park which could be used for office and storage space for operators and users of the airport. They say that no justification has been provided to explain why 116,000 sqm of floor space is required.

The impact of noise from airplanes overflying on resident's health and well-being.

TDC doubts the operator's suggestion in the Noise Mitigation Plan that it will seek to operate take-offs from Runway 28 and landings on Runway 10. **It says it provides no certainty. Local experience has been that runway use has largely been determined by the prevailing wind direction.**

TDC say the densely populated area of Ramsgate would be the most affected residential area. They are critical of the Appendix "Aircraft Noise Modelling", saying "The applicant will need to provide clear details of the assumptions used in the aircraft noise modelling and a commitment not to exceed these limits or revise the findings of the assessments as otherwise there may be further significant effects than considered in the ES.

TDC, like all interested party have been restricted by only having RSP's calculation of noise contours to comment upon. With PINS not able or willing to commission independent calculations, it has been left to residents or residents groups to commission those independent calculations by the CAA and show the RSP contours to be unreliable. These are now available and we would hope that TDC would reassess this aspect of the LIR with this mind. Though with the short time left to run on the DCO this is very doubtful.

We are critical of TDC's acceptance of the 63 db LAeq 16hr noise contour as determining properties qualification for noise insulation. We believe this level of acceptance is retrospective whereas as the proposed development is for the future and should meet developing standards we note that the industry norm (including) Heathrow is around 60 db LAeq 16hr, and London City Airport, which has a relationship with nearest residential properties similar with Manston/Ramsgate, 58 db LAeq 16hr is used. We see no reason why London residents should receive better consideration than Ramsgate ones.

We believe that noise contours are not a good representation of the misery noise levels in excess of 90Db causes. More weight should be given to noise levels from single events as these are how residents experience them. TDC comment regarding local concerns regarding the weight in the ES and Noise Mitigation Plan gives to previous monitoring work collected by TDC from the operation of the airport before

its closure compared to the ES. These measurements show LAmax, SEL and LAeq,T of individual aircraft of 90 -100db. These real life readings have been totally ignored by RSP even though they are widely available.

RSP in the ES do concede that their plans will cause permanent adverse effects and a perceivable change in people's quality of life.

Adequacy of noise insulation grant

TDC suggest that £4000 may not be sufficient to cover the noise insulation (and ventilation), which may lead to low take up of the grant and so it would not mitigate the effects. This may be particularly true concerning the many listed residential properties in Ramsgate. There seems to be no mitigation offered to community buildings or others where people congregate. There is no evidence that the £4000 figure has been tested in the local building market. It does not address the problem of vibration from low flying aircraft which has been highlighted as a big concern by many Nethercourt residents. Over time this can cause structural damage to homes

The impact on Ramsgate's schools and the education of children.

TDC say that significant effects are predicted at seven schools from a change in noise levels. Despite this no mitigation is proposed. TDC say this will affect school development and the outdoor education curriculum. This is based on the use of RSP's calculation of noise contours, and the 63 db LAeq 16hr which we question. (see above). Local experience of when Manston was previously operational, from local teachers has been lodged with us and with PINS that demonstrate that classes were regularly interrupted and outside pursuits curtailed.

The impact on resident's and visitor's sleep patterns

There is increasing evidence from WHO and others that has been shared with PINS that disrupted sleep patterns have a severe detrimental effect on health, especially children who need more sleep. TDC say that the ES considers that the potential numbers of night flights is not considered to cause significant effect through awakenings. They comment that there does not appear to be measures to minimise the effects of night flights and reduce the effect over time, rather than just increasing in perpetuity. PINS will be aware of the discussion around late arriving and early leaving aircraft. Given our comments regarding actual experience of overflying at 90 – 100 db LAmax, we believe every flight will result in awakening. We look to PINS to impose the strictest possible restrictions on night flights with severe penalties for non-compliance.

The impact of air pollution from aeroplane overflying

TDC say The flight paths of the planes will cross the Thanet Urban Air Quality Management Area (AQMA) which was designated in 2011. Any adverse impacts on

the AQMA will cause significant affects for those living and working in this area and particularly at High Street St Lawrence, Ramsgate, where baseline levels are relatively high. TDC quite strongly suggest that and increase in air pollution is unacceptable. **Nethercourt residents experience of pollution from overflying aircraft when Manston was operational included contamination of gardens & ponds by unburnt aviation fuel, particulates, brake & tyre dust and antifreeze in the winter. Windows and anything left outside like washing was covered in oily residue. This included people who were unfortunate enough to be outside at the time.**

TDC say the DCO refers to an Operation Environmental Management Plan(OEMP), that requires approval by the SoS or local planning authority and that it should address a number of aspects of air pollution. TDC suggest that a 106 agreement to secure funding for continuous air quality monitoring stations and the use of dispersion modelling to ensure that any mitigation measures are effective. TDC considers the OEMP should be a document to be Certified, with TDC being the relevant approval body. **We agree, and regard air pollution as the most concerning, if unseen aspect of the proposal.**

The impact on the fresh water aquifer and on resident's and visitor's enjoyment of open spaces including gardens, parks and beaches

TDC express serious concerns regarding site contamination and proposed development on the high sensitivity of the local chalk aquifer. It considers proposals put forward to date for mitigation of potential effects are insufficient to demonstrate that significant negative impacts can be avoided. **Residents experience, as suggested above, has documented the impact of overflying on enjoyment of gardens, parks and beaches, including health activities such as walking, cycling and outdoor sports**

The likely requirement for and subsequent impact of, airport public safety zones (PSZ)

TDC say the application does not include any reference to the anticipated Public Safety Zones (PSZ)

PSZ needed by year 15 using RSP's own forecasts. Other airports have done this as best practice This would affect the local plan which sets out housing requirements for the next 20 years and a PSZ would cause some allocated land to be removed and put pressure on more greenfield sites. Also a PSZ would put a planning blight on nearly all homes in Ramsgate certainly most homes on Nether court estate.

In summing up we believe RSP have done everything they can to exclude, mislead & misinform and we believe RSP are still doing their best to play down the true impact of their proposals on Ramsgate residents.