

Noise Mitigation

The subject of night flights has been a major issue during the entire process of this project. It was raised by residents very early on at the various consultations and at that stage we were assured there would be none at all other than for emergency and humanitarian reasons.

Since that time we have continued to be told by RSP, Craig Mackinlay MP, Sir Roger Gale MP, SMAA and others that there will be no night flights. The examiners of the project were also told this but stated that, notwithstanding claims from RSP, there would in fact be night flights.

We have now seen the definition of what is not a night flight expanded to include planes which arrive at night but which are late. The night time period has already been defined narrowly, starting much later than the children (and many of the adults) under the flight path will go to bed; the recommended time for small children aged 5 to 8 is for them to be in bed asleep by 7pm. Notwithstanding the tightly defined window, RSP are seeking to ensure that no planes are defined as triggering a QC count by ensuring that, within their definition, all planes arriving within the night time period are actually exempt. I can't believe the audacity of their asking for this - it will mean that there can be an unlimited number of "late arrivals" within the night that will not trigger a QC count. I hope the examiners will expose this ruse, dismiss it and record it as yet another example of the complete abuse of the DCO process, and a complete disregard for the examiners and local residents.

A night flight must surely be defined as any plane movement which occurs between certain hours considered to be the night. Whatever the reason for these flights is, they will be travelling over the heads of people trying to sleep who will, without a doubt given the low flight path over Ramsgate, be woken. I can perhaps understand emergency and humanitarian flights being excluded from the QC count although I expect the airport will still receive the same amount of revenue in respect of these flights (perhaps the examiners could clarify the position on these flights in this respect). However, with a plane that arrives late for whatever reason it cannot be right that the airport is not penalised for this movement, a cost which it can pass on elsewhere in any case. It cannot be right for the local residents to bear the human cost of sleep disturbance in these situations merely so that a private company can make profit. As I've said before, if penalties for late arrivals were large we may see better planning by the aviation industry to ensure late arrivals are minimised: without a penalty there is no incentive.

It would seem the main issue for RSP is late arrivals. They are asking for a QC count of around 3000 but are happy to reduce this to 2000 if late arrivals are excluded. This seems to infer that they would expect around 1000 QC points in respect of late arrivals; how many ATMS is this though? They must know as they would need to have modelled them. If RSP are concerned about late arrivals then perhaps the permitted airport opening times need to be reduced to say 8 or 9pm to allow late arrivals up to say 10pm. The question which needs to be asked is if late arrivals, emergency and humanitarian flights are excluded what is the remaining QC count of 2000 actually for as it's very high? I would suggest that if a QC count is going to be allowed at all, the appropriate count should be 1000 and on that basis late arrivals would count against this count with a fine being levied. Emergency and Humanitarian flights will of course be excluded subject to my point above on revenue earned by the airport. If a QC count is going to be allowed it also needs to be accompanied by an ATM limit as is used at other UK airports. We must also ensure that the planes allowed under

any QC count are the same as those allowed at other airports, RSP is asking for something much more aggressive.

Historically we saw many night flights which were late arrivals but which regularly “arrived late” on the same day at the same time every week as no action was taken to avoid the late arrival. We are fearful that this will just happen again on a much larger scale given the 17,000-odd expected movements annually. It will of course be for RSP to confirm whether a flight has arrived late or not and if they’re excluded, residents will have no way to challenge this.

Noise Mitigation for Schools

With respect to noise mitigation for the schools that RSP have not even bothered to consult with and who they are only now trying to properly provide for, their proposal is wholly inadequate given the importance of the schools underneath the flight path and the thousands of pupils that will be affected over the next 20 years. It is also inadequate when compared to the estimate from KCC of the cost per school being somewhere between £150,000 and £300,000. The amount to be set aside for schools should be the upper level suggested by KCC of £300,000. If the cost turns out to be lower then a refund can be made and if it turns out to be higher a further payment should be made as at other airports 100% of the cost is paid. Why should our schools have to pay if there’s a shortfall when school budgets are under such pressure? The profits of a private company should not be enhanced by allowing it to pass on some costs to the public sector or the public.

Treatment of Local Residents

The huge majority of residents are completely unaware of what will happen to them should this airport DCO be granted. There has been a regular advert in the local press sponsored by the main supporters of the airport SMAA that this airport will create many jobs and that there will be no night flights. I am very concerned about the reaction there will be from the community should this DCO be granted and we suddenly see a huge number of planes overhead continually during the day and a good many at night which will be totally unexpected. It won’t be a good reaction, even from the supporters of this project. It is therefore paramount that we at least ensure that, as promised by RSP, there are no night flights at all; not even late arrivals

Noise mitigation for the residents of Ramsgate and Herne Bay must be the maximum amount of help possible and as a minimum the same help as those at London City and Heathrow Airport where help is provided at 57db and 55Lden.

We must not forget the topography of the land around the airport means that the path to the airport is at 3 degrees, much lower than at other airports where it is 5 degrees. As I’ve stated before, it is inconceivable that properties in Wellington Crescent and Albion Place should not be eligible for noise mitigation assistance.

In the Government’s response on Airspace Policy they acknowledged the evidence from a 2014 Survey of Noise Attitudes which showed that sensitivity to aircraft noise has increased, with the same percentage of people reporting to be highly annoyed at a level of 54dB LAeq 16-hour as occurred at 57dB LAeq 16-hour previously. The research also showed that some adverse effects of annoyance can be seen to occur down to 51dB LAeq. In acknowledging this the Government stated they will adopt a risk based approach so that airspace decisions are made in line with the latest

evidence and consistent with current guidance from the World Health Organisation. This will include setting a lowest observed adverse effect level (LOAEL)²¹ at 51dB LAeq 16-hour for daytime, and 45dB LAeq 8-hour at night. The Government expect that these metrics will ensure that the total adverse effects on people can be assessed and airspace options compared. Further noise research is also expected to be carried out during the period of this Noise Action Plan. This is to improve understanding on health and quality of life outcomes in areas affected by aircraft noise and how this can be clearly evidenced with frequency-based noise metrics and to better understand how aircraft noise effects on communities in rural and urban areas may vary.

The direction of travel with noise mitigation is clear with London City and Heathrow offering compensation now at 57db and 55Lden, no doubt in anticipation of further moves in due course. There is pressure from the WHO for the level to be improved further to 54db and it is likely this will be adopted in due course. Given Manston will take some time to construct before operation it would seem prudent to assume that the 54db level will have been adopted by that time and provide for compensation accordingly. If for some unexpected reason the 54db is not adopted and it remains at 57db then clearly a reduction in the compensation scheme can be affected.

Obviously the maps used to determine how many properties are inside a particular Db contour are key to the noise mitigation plan and need to be constructed properly. The RSP contours were derived by someone who had no experience of developing them and therefore need to be discarded and replaced by those done independently by the CAA and which have already been provided to the examiners.

PSZ's

I have seen various submissions concerning the need for a public safety zone. The rules for establishing one are very clear and prescriptive having been provided by the appropriately skilled body the DfT. RSP documentation shows that a PSZ will be required fairly early on in the airport expansion and it is therefore clear the provision needs to be made now for a PSZ and appropriate action taken and funding provided with respect to whatever is required.

Climate Change

The opening of a new freight hub in the UK, especially when there's sufficient capacity elsewhere and a demand now for climate change purposes to reduce aviation, seems completely at odds with government and international policy. There is already demand for UK citizens to cut down on air freighted food in order to address the climate change issue and this would seriously affect RSPs business case. Have they taken any of these factors into account when carrying out their forecasts and viability study and considered fully the impact their operation would have on climate? Have they assessed for the impact of the current drive on climate change for UK citizens to reduce the amount of air freighted food and produce they consume? Have RSP considered how their operation helps the country achieve a net zero carbon emission target by 2050?