

**MANSTON AIRPORT DEVELOPMENT CONSENT ORDER EXAMINATION  
SUBMISSION TO DEADLINE 9:  
Comments on Information requested by the ExA and received from the  
Applicant to Deadline 8  
and  
Overarching Statement on dDCO**

1. The comments made by Five10Twelve Limited on the dDCO or any part of the Application/Examination are without prejudice to our position that, inter alia;
  - a) the Applicant's case is not credible;
  - b) no need has been demonstrated, and the case presented by the Applicant, which is based on the Azimuth report, is fundamentally flawed;
  - c) no compelling case in the public interest has been demonstrated;
  - d) no justification has been provided as to why the Works, as listed in Schedule 1 of the Revised Draft Development Consent Order, satisfy the legal tests of "NSIP development" or "Associated Development";
  - e) no justification for the extent of land acquisition has been provided;
  - f) no reasonable attempts have been made to acquire the land voluntarily or alternatives explored by the Applicant;
  - g) no credible business plan has been presented;
  - h) there is no evidence that funding is available;
  - i) there is no evidence that the level of funding proposed is adequate;
  - j) there is no evidence that the Applicant can reasonably expect to raise and commit the necessary funding to implement the authorised development;
  - k) the Applicant has not assessed the likely worst case environmental effects;
  - l) the Applicant has not properly consulted on its Application;
  - m) the mitigation measures are significantly wanting, not proportionate and not tailored to the location, proximity,

inhabitants, housing stock, schools and open spaces and parks etc  
of Ramsgate, Herne Bay and Thanet; and

- n) it is not lawful or appropriate for survey results to be deferred until a later decision making stage etc.