

Night Flights

Response to ExQ4

Throughout this sorry saga, RSP have sought to confuse and obfuscate on the issue of night flights. They know that this issue unites the people of Ramsgate, unites our two parliamentary representatives (they can flip flop a bit) and unites opinion increasingly nationally and internationally as to unacceptability. With increasing guidelines, recommendations, legislation and precedent set at other airports, the days of ushering in night flights under the radar claiming need and economic benefit are over.

RSP have:

1. Always claimed in public that they don't need night flights whilst simultaneously ensuring that their initial application very much focused on a need for night flights.
2. Played fast and loose with the definition of 'night'. As is generally the case in the aviation world, they choose to talk about 'shoulder periods' which, in fact are part of the internationally recognised night period of 23.00 to 07.00. Science is almost 100% united on the view that humans need an 8 hour period of sleep/rest. Children, the elderly, the sick and the frail obviously have even greater needs.
3. Insisted on a QC that completely at odds with any statement about the not wanting to fly or allow planes to land at night.
4. Used language to confuse and allay fears by variously talking about no 'programmed' flights, no 'scheduled' flights, no 'planned' flights.
5. Failed under questioning from the Examining Authority (ExA) to explain their need for such a high QC (3028).

In its Deadline 8 submission, RSP again try to dissemble with:

*"The Applicant has considered the night-time quota count of 3028 that it is proposing in the light of night-time flights now only consisting of **late-arriving** flights, plus emergency and humanitarian flights and departing flights between 0600 and 0700. It is unlikely that there would be more than five passenger flights departing during that hour and unlikely that any aircraft with a quota count of great than 1 would be used. The applicant is therefore willing to reduce the quota count to 2000 (365 x 5 being 1825) but this would be on that basis that **late-arriving**, emergency and humanitarian flights would be excluded from that total. If they are to be included as at present, then the Applicant would wish to keep the original figure of 3028."*

This is a typical response from RSP. Typical in that it can appear on first sight to be an obliging response to the proper interrogation by the ExA on the need for such a high QC. Indeed, on first reading, it seemed to me that they were saying 5 flights

between 06.00 and 07.00 and then 'just' emergency and humanitarian flights. This is not the case, of course.

RSP desperately want planes to be able to land after 23.00. They will name them unprogrammed, unscheduled, unplanned, late arrivals, anything to ensure that they can continue to claim that they are not allowing night-time flying and that there are stringent controls to prevent them from so doing. Ramsgate and other residents are all too familiar with this type of strategy. Our experience of 'late arrivals' tells us that these planes can arrive at any time during the night. Our experience tells us that some late arrivals arrive late so consistently and so regularly as to seem scheduled. You must excuse our cynicism. We've lived through this. Bickerdike Allen produced a report for the owners of Manston, Infratil, in 2011 in which they looked at ad-hoc, late arrivals during the night. Their work showed between 365-730 a year meaning that between 24.8% to 50% of all Manston's ATMs were late. This was at a time when Manston was a tiny airport and reflected a year in which there were just 1,472 ATMs. Similar percentages applied to RSP's proposals would mean a night flying regime that would destroy health, sleep, peace and, ultimately communities and the town itself. This is not unduly dramatic. This is not based on guesswork. This is based on what we've lived through before.

So, with late arrivals being excluded from the QC as part of their demand, Ramsgate residents have no protection. A reduced QC that allows 5 flights during the night (from 06.00-07.00) is in itself unacceptable and, again, our experience of scheduled early morning KLM flights speaks to the disruption, annoyance and distress caused. However, a reduced QC that allows unlimited late arrivals gives RSP licence to essentially operate the airport through the night.

The ExA question to the applicant "Will the Applicant secure this commitment in the DCO" fills one with foreboding. One would feel certain that RSP would happily commit to this, secure in the knowledge that any and all late arrivals would be excluded from any QC. It is clear that the ExA is pressing on noise, health, compensation and limits to night flights but this is not the way to do it. RSP want flights to be able to land during the night.

Evening and night-time ATMs cause disproportionate detriment and distress to residents. No Night Flights has pointed out before that there is a noise assessment metric that tries to reflect this additional 'annoyance' – the L_{den} (Day Evening Night Sound Level) or CNEL (Community Noise Equivalent Level) is the average sound level over a 24 hours period with a penalty of 5dB added for the evening hours of 19.00-22.00 and a penalty of 10dB added for the night-time hours of 22.00 – 07.00. RSP need to produce contours that reflect the new fleet mix they are proposing and the evening/night-time flying that is both stated and implicit in their proposal. Of course, before they could do so, they would need to be clear as to the actual numbers of flights anticipated both in the evening and at night-time. RSP have consistently tried to avoid any such clarity. They wish to keep open the possibility of very many 'late-arriving'/unscheduled/unprogrammed/chartered or otherwise planes as did the previous airport owners/operators.

Without this clarity, how is the ExA supposed to balance the claimed benefits of the Applicant's proposal against the harm caused to the population? With no clarity regarding an absolute cap on ATMs during the night-time (23.00 – 07.00), any assessment of this kind is impossible and leaves wide open the very real likelihood of the balance being very firmly in favour of RSP and their ad hoc, 'open -all-hours' approach that they need to woo operators.

I urge the ExA to pin the Applicant down and prevent the application from continuing to allow, by default, a stealth night-time flying regime.

Susan Kennedy

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