

Riveroak Strategic Partners (RSP) Application for a Development Consent Order (DCO) to develop a cargo airport in Manston, Kent

Ref – TR020002

I am hereby registering my objection to the plans of Riveroak Strategic Partners (RSP) to develop a cargo airport in Manston.

In my previous four submissions to the Planning Inspectorate (PINS) I have focused upon the pivotal point that, in order for a Development Consent Order (DCO) to be awarded for Manston to be re-opened as a cargo hub airport, RiverOak Strategic Partners (RSP) need to prove that a) there is a vital, national, need for a dedicated freight hub b) Manston is well placed to serve this need c) the project meets basic criteria laid down to become a Nationally Significant Infrastructure and d) RSP can make this happen. In stark contrast to the absence of key details from RSP in response to its requests during the examination process, PINS has received an abundance of evidence from myself and others, over the course of our various submissions since 2017, which emphatically reveals that RSP is unable to establish any of the above conditions. On this basis, I anticipate that PINS will recommend that the Secretary of State refuse to grant a DCO.

My previous submissions have also expressed my disappointment that, following two inadequate consultations, and the inability/refusal of RSP to disclose the potential source of funding from the outset, PINS nevertheless accepted the Manston Airport project for examination. Apparently having dismissed the consultation as an irrelevant process after all, PINS has thus undermined its credibility from the perspective of stakeholders within the community; and we are looking to the conclusions it draws as a result of the examination process being more consistent with the evidence to hand. In this case, I expect that PINS recommendation to the Secretary of State will be the refuse of a DCO.

I have also previously pointed out that the 3,000 plus page document presented to us for consultation by RSP had extended to 11,000 pages by the time it was submitted to PINS; thus rendering the consultation invalid. Moreover, there is so much more information still being requested by PINS yet unforthcoming, and still so much uncertainty over many significant aspects of the application, that interested parties will be denied the opportunity to read, understand and comment in detail on any of this requested information within the statutory examination period. A recommendation that a DCO be awarded under these circumstances would constitute an abuse of the DCO process, and so PINS clearly has no choice but to recommend for the application be refused.

In addition, my former submissions have highlighted the cavalier attitude adopted by RSP towards the undoubted effects of a large cargo hub airport upon the health of Thanet residents living within a 6 mile radius, and 26 miles downwind of the proposed airport; a community which moreover suffers the worst health record in Kent according to the county's Director of Public Health, and is therefore particularly vulnerable. RSP plans for a cargo operation over 29 times, and a passenger operation more than 14 times, greater than the annual average of any previous operation out of Manston. This would produce noise and air pollution on a scale never before experienced by the significant number of residents who have moved to the area in good faith since the airport closed, by those who are yet to become residents of the innumerable houses currently being constructed around the very perimeter of the Manston site, or even by those already in residence throughout any of the airport's previous incarnations. Yet, even during these periods, monitors recorded noise levels of 100dB, and there were repeated complaints by residents. The World Health Organisation (WHO) assesses the onset of significant community annoyance occurring at 50 – 55 decibels during the day and 40 at night; with

aircraft noise levels above 45dB Lden being “associated with adverse health effects”. Yet a large surrounding area of Manston, including the densely-populated town of Ramsgate, would experience between 51dB and 57dB night noise levels: independent experts commissioned by TDC calculated that a 747 taking off at night over Ramsgate would create a noise footprint that would affect 30,000 people. At a time when airports in the UK, as internationally, are compelled to think carefully about the effects of, and to reduce, aircraft emissions, the development of a new airport must not only be convincingly justified in terms of benefits nationally and locally, but would also be expected to spearhead best practice. The Independent Commission on Civil Aviation Noise recognised that “How much – and in what way – an individual is affected by aviation noise cannot be explained or described by any graphs, metrics, maps or other data. Nor can the bigger-picture benefits to the economy realistically be expected to compensate those who suffer from aviation noise.” Not only is RSP unable to justify its project, but its noise level contours seriously underestimate effects when compared with those of Civil Aviation Authority experts. PINS has been provided with adequate evidence by a number of different experts which in unison contradict Dr Dixon’s extraordinary individual view that the UK needs a dedicated freight airport, that this would be best placed in Manston, and that thousands of local employments will be thus generated. There are no big-picture, or even local, economic benefits attached to this project as compensation for damaging the health of residents and terminating the island’s currently burgeoning tourist industry. Given that this is the case, I therefore envisage that PINS will recommend refusal of a DCO.

Finally, my previous submissions have expressed a lack of trust and confidence in the utterances of RSP; questioning the experience and integrity of its representatives. There is evidence of a lack of consistency between utterances of different executives, of the same executive on different occasions, and of aggressive behaviour towards dissenters. There is proof of vastly over-inflated forecasts and benefits being pedalled in documentation and at presentations, many of which RSP has since been forced to amend. I have documented the history of repeated failure within the aviation industry of executive Mr Freudmann, and the financial losses thus incurred by local authorities in England and Denmark, the Italian Government and the EU, who he had persuaded to support him. I have discussed how RSP has misled the local community by exaggerated promises of employment, whilst hiding the real impact that the airport envisaged would have upon those already employed within the island’s tourism; and I have explained how RSP’s repeated claim that there will be no “scheduled” night flights is aimed at masking the fact that its documentation clearly states that night flights are planned, and actually requests a Quota Count (QC) in excess of that at Heathrow. That RSP is now offering to reduce its annual QC if late arrivals are not included is yet another ruse. This would allow for limitless freight flight movements throughout the night with no penalty, and no right of complaint or Appeal by residents. Instead, there should be an absolute cap on Air Traffic Movements (ATMs) both day and night, and QCs established according to WHO guidelines. The result would then undoubtedly make evident that it is too dangerous to position an airport of this proportion within the proximity of such population, unless RSP is prepared to match fair compensation earmarked by Heathrow and London City airports and relocate thousands of residents. An allocation of merely £10,000 for only 275 homes is a drop in the ocean and totally unacceptable. I am therefore convinced that PINS will conclude to recommend a refusal of the DCO for the RSP project.

Karen Anne Roper
Minster