



RAMSGATE TOWN TEAM: RESPONSES TO EXQ4 280619

In response to the ExA's Fourth Written Questions for Deadline 9 (28th June) we wish to point out the following in addition to our comments at earlier deadlines:

1. Night Flights:

We are deeply disturbed to note that less than 3 weeks before the close of the examination it appears that the question of night flights, understandably of crucial concern to the communities affected by this proposal, is still not resolved.

Throughout this process, RSP Ltd have insisted that the unmet demand they believe exists relates to daytime rather than night-time cargo transport. (We have pointed out that we find it difficult to see how RSP's claims of unmet demand square with what we have seen of their business plan, which appears to rely heavily on taking business from other airports, and which we gather anticipates Manston securing 122% of the total existing UK cargo market in future. We are also puzzled as to how a plan based on taking business from other airports demonstrates the 'overwhelming national need' which we believe a DCO requires.)

However, in this submission we are concerned primarily with night flights, which pose particular dangers to the physical and mental wellbeing of residents, and in particular the welfare of children and the elderly. We do not feel the examination process has secured satisfactory responses from the applicant on several points here, including specifically:

- the use of 6 am as the start of the 'daytime' schedule. We understand that this runs counter to practice at other world airports which use 7 am. A 6 am start to a daytime schedule is far too early for an area which has a predominantly older population. It is also particularly disturbing to young families, who have been moving into Ramsgate in increasing numbers since the airport closed. We would urge the ExA to insist that a daytime schedule should start at 7 am at the earliest, and preferably later.
- more disturbingly, the applicant's apparent attempt to 'strike a bargain' regarding late-arriving flights potentially means that although no 'scheduled' or 'planned' night flights are part of their proposals, arrivals could in fact happen throughout the night on the basis that these landed late. Residents who lived here during the airport's previous periods of operation complained that 'late arrivals' happened frequently throughout the night. The applicant's proposal would give it *carte blanche* to accept incoming flights at all hours labelled as 'late arrivals'. This proposal must be rejected.

We note that Mr Broderick of the ExA appeared to share our concerns, asking the applicant at the hearing on 22nd March 2019: "To sum up, there is no ban on night flights, is there?" The applicant has not convinced us that night flights are not part of their plan – indeed, we cannot see how they would achieve the requisite number of ATMs without them.

2. Frequency of Flights:

In order to achieve the increase of 10,000 ATMs that we understand is needed to designate this a National Strategic Infrastructure Project, the applicant will need 29 times as many flights as have ever run out of Manston at any stage in the past. Leaving aside the extreme unlikelihood of this total actually being achieved in practice, if by some extraordinary chance it were to happen, the impact on local communities is scarcely adequately described by the applicant's original PEIR assertion that 'significant adverse effects' would be felt in the communities of Ramsgate and the surrounding area.

The impact would be devastating. It would destroy health, wellbeing, quality of life, education and tourism in Ramsgate and the surrounding area.

For every one of the jobs the applicant asserts will be generated by the airport (which in fact the most recent hearings have exposed as mainly arising elsewhere in the UK or abroad), jobs would be destroyed in tourism and the visitor economy, the arts, sports and health sectors. Small tradespeople, estate and letting agents, builders and support service workers whose businesses have boomed as more new residents have moved down from London and elsewhere to the coast would now struggle for business as this work dried up. This, rather than an increase in jobs and a knock-on effect on the supply chain, would in practice be the displacement effect of a 29-fold increase in flights into and out of Manston.

3. Noise Contours:

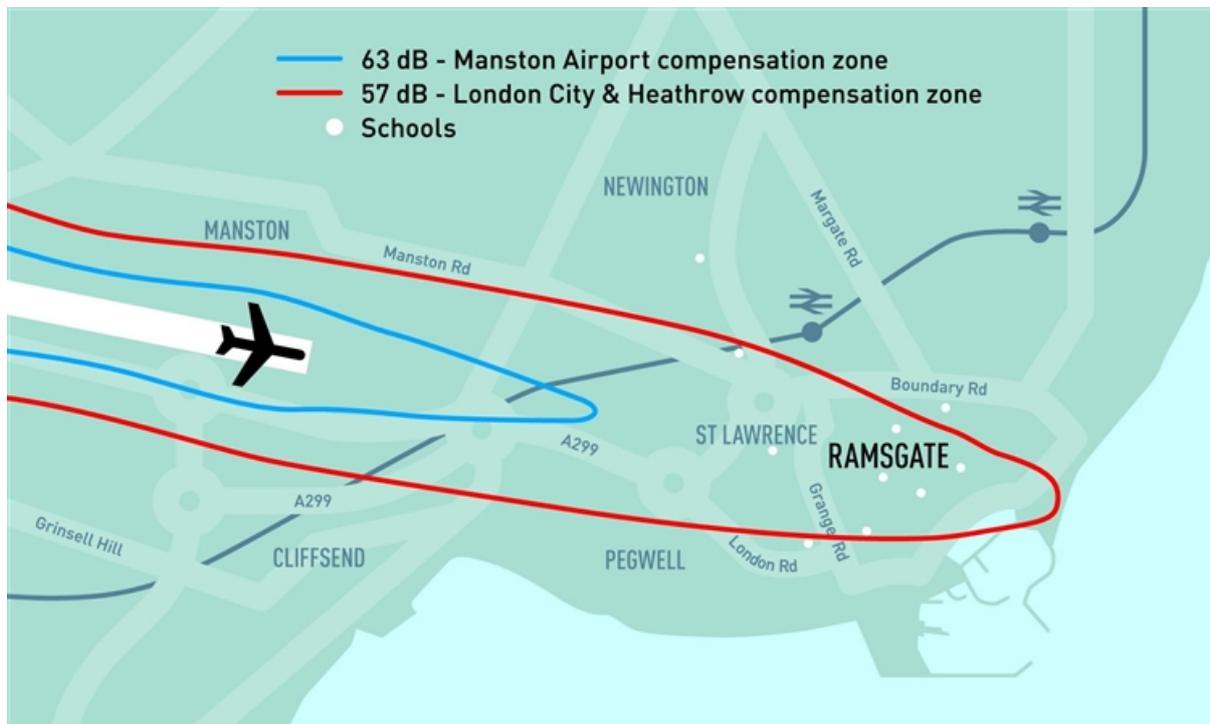
With all due respect to the limitations placed on the ExA by the procedures it is required to follow, we find it frankly shocking that residents have found themselves obliged to commission at their own expense noise contour surveys because those used by the applicant clearly massively under-represent the impact of noise on local communities. This is in addition to the huge commitment of time and effort that has been required of ordinary local residents in attending hearings, researching the air cargo business and presenting detailed submissions in order to do their best to defend their right to a quality of life.

As other submissions have made clear in much more detail, noise contours commissioned by two separate groups of local residents at their own cost from the Civil Aviation Authority show that very many more households than the applicant's noise contours indicate will be severely negatively affected by noise if the DCO proceeds. We gather that the applicant's noise contours show under 300 households severely affected and therefore eligible to compensation, whereas the contours commissioned from the Civil Aviation Authority by No Night Flights and Five10Twelve Ltd show somewhere close to 30,000 households suffering extreme noise. This anomaly must be investigated as a matter of urgency.

4. Compensation:

This leads on to concerns expressed by residents about the levels of compensation offered by RSP to those householders likely to be most severely affected by noise if the DCO is approved. As well as many more households being potentially eligible for compensation, a concern has been raised as to why Thanet residents are receiving a less generous offer to London households. London City Airport and Heathrow offer compensation to households

within the 57 decibel contour, whereas RSP is only offering compensation within the 63 decibel contour, thereby potentially excluding at least 6,500 severely affected households, as the map below shows.



In an area that already suffers poor educational outcomes, we are particularly concerned at how many schools would be severely affected by noise if the DCO is approved. One of our Committee taught near Heathrow and identifies the loss of useable teaching time as equivalent to roughly one whole day a week – irreplaceable time for teaching and learning.

RSP now proposes offering schools a rather higher level of compensation than we gather they originally planned, but as we understand it they do not propose to start paying this until the airport is up & running, by which time it will be too late for retrofitted insulation to be installed. Compensation also appears set as a proportion of school budgets, disadvantaging struggling small schools.

Other anomalies exist in RSP's compensation plans, making them difficult for residents to understand – for example, some schools are identified as severely affected and therefore eligible for compensation, whereas residential properties in the same and neighbouring streets are excluded. As with so much in the applicant's proposals, clarity appears to be completely unachievable, leaving residents obliged to make best guesses on plans that would dramatically affect the quality of their lives.

5. Public Safety:

We are dismayed to note that the applicant appears to have given little thought to the matter of Public Safety Zones close to the runways it will operate if the DCO is granted. In its Q&A on Public Safety Zones for Exeter Airport five years ago, the CAA explains: A: *"The objective is that there should be no increase in the number of people living, working or*

congregating in PSZs and that, over time, the number should be reduced as circumstances allow (e.g. when any redevelopment takes place)." Yet, as has become clear at the recent public hearings, substantial new residential developments are planned within very close proximity to the former airport, and in the case of Cogent's large new Manston Green development, it appears there may even be some overlap regarding land availability and access requirements.

There is considerable pressure on land in Thanet, and the Secretary of State for Housing has set a requirement for some 17,000 new homes in the area by 2031. If the Manston site itself is not available for housing, pressure on other sites, including those very close to the proposed airport, increases.

If a DCO is granted, these matters must be resolved, appropriate Public Safety Zones established and arrangements made to compensate developers planning housing in the area as a matter of some urgency.

6. Financial Risk:

In a previous submission we highlighted our serious concerns regarding the applicant's financial status and the risk of granting a DCO for a National Strategic Infrastructure Project to a start-up business, particularly one where only one of the Directors has airport experience, which sadly resulted in failure and default on debts.

No information has been made available since then that reassures us as to the financial security of the applicant – indeed, its attempts to cut to the bone the compensation available to schools and local residents, its lack of provision for Public Safety Zones that might require financial outlay, and above all its longstanding refusal to clarify its own sources of funding despite the repeated questioning of the ExA all combine to worry us considerably as to whether RSP Ltd are fit and proper contractors to take on a project of this magnitude. RSP's latest letter of comfort appears to be from a body listed at Companies House as having assets of some £400,000 – hardly enough to bankroll a multi-million pound airport scheme. We believe that granting the DCO represents a very considerable, unjustifiable risk – particularly considering the very limited public benefit offered.

7. Public Benefit:

As mentioned earlier, it is hard to see how a business plan that relies on transfer of business from other airports can realistically be seen as meeting a substantial national need. With regard to local benefit, RSP have referred to the many jobs they will create in this disadvantaged area, but it was clear at the most recent hearing that few jobs will be created in Thanet. (We have outlined previously how automation has dramatically reduced cargo handling jobs and will not repeat this here.) Their discussions with local training providers appear not to have progressed since previous hearings – and many other affected parties locally, from the Spitfire Museum to the MoD, appear to have heard nothing from them.

It is difficult, therefore, to see how benefit can be generated either locally or nationally from this proposal, while potential devastation of our town and the negative impact on health, education and the local economy is all too clear. We urge you to reject this DCO proposal.