

MANSTON AIRPORT DEVELOPMENT CONSENT ORDER
Submission to Deadline 11
Submitted by email, Friday, 5th July 2019

This submission is in three parts:

**Procedure
Need
Noise**

1) **Procedure**

1a) **Consultation**

It is a fact that the Application was accepted for Examination. It is a fact that the PI deemed that the Consultation was adequate. The reality is that the Consultation was far from adequate. It was bordering on the farcical.

For example, there was hopelessly inadequate notification given by RSP to the people of Thanet about the proposed project, and about the times, dates and venues of the Consultation meetings. Their documentation, such as it was, was impenetrable on the internet and located in a stack of cardboard boxes behind the librarian's desk in the local library. RSP, against PI advice, held a "non-statutory" Consultation, which confused people. Had they attended a consultation or not? Were the comments they made heeded? Would they count towards the DCO examination?

In at least one event, the venue was "staffed" by pro-airport people. The attitude of one of RSP's directors towards people who attended a Ramsgate Consultation did little to engender confidence in RSP, given that his delivery was laden with expletives and referred to Ramsgate people in the most derogatory of terms. The atmosphere was so threatening that some folk, not supporting an airport, felt obliged to leave.

At various Consultations, incorrect and misleading information was given out. For example, a large banner at one Consultation event declared that there would be "30,000 jobs for local people". It was pointed out to Dr Sally Dixon that this was nonsense. However, the banner still appeared at the next Consultation. At the Consultations,

no information was available about noise contours, nor about flight paths.

Between RSP's first and second attempt to submit a project for examination, the number of ATMs rose from 17,000 to 83,000. Four times I queried this with RSP, and asked if, given that the proposed number of flights was so much bigger than those consulted upon, there would be further Consultation. Four times I was fobbed off with vague platitudes. Finally I was told

*“On Monday, RiverOak Strategic Partners re-submitted its DCO application to the Planning Inspectorate. **The application documents will be made publically [sic] available to view if the application is accepted.** Please keep an eye on the project website for further updates on the application status. “ (My emphasis. Reply from RSP in response to a query raised on 16th July 2018. See attached “email exchange june july 2018.pdf”)*

In other words, the circumstances surrounding the decision to increase ATMs from 17000 to 83000, and the opportunity to ask questions about these circumstances, would only be made available if and when the application was accepted. A crucial opportunity for interaction between RSP and concerned residents was denied. The Consultation might, *de jure*, have been adequate, but *de facto* it was useless.

1b) **Process**

It is admirable that the principles of openness and transparency have been adhered to throughout the Examination Stage of this Application. It is very disturbing, therefore, to read, (letter from RSP via BDB to the ExA dated 2nd July) just a few days before the Examination phase draws to a close and further representation and comment from Interested Parties will be denied, that the Applicant intends to correspond subsequently directly with the SoST apropos outstanding issues. Where now the openness and transparency? What is the point in an Examination Stage?

2) **Need**

There really isn't much to say. Far from Dr Dixon and Azimuth having demonstrated a need, just the opposite. Davies, Falcon, Avia, York, Altitude all say, to a common accord that: not only is there no requirement for additional dedicated air cargo facility in the UK, but if there were, then Manston is not the place for it. Even Dr Dixon's own data shows that not until year 6 (whenever that is) will the key threshold of 10,000 ATMs be achieved. (See, for example, the table on p1 of Vol III of TR020002 APP 7.4)

Since the Application was presented for Examination, Heathrow 3 has been confirmed, creating such a surplus of capacity that there will be no justification for any other regional airport expansion for decades to come.

And again, since the Application was presented, growing concerns internationally, nationally and locally have been expressed over Climate Change and the impact and contribution Aviation makes. If the UK government is to meet its obligations, then it should be curtailing, not increasing, aviation facilities.

3) **Noise**

Should the ExA and the SoST be minded to grant the Applicant's order, then the greatest concern of many many people living, working and studying in Thanet in general and Ramsgate in particular is that of noise.

RSP say, in their own documentation (non-technical summary, P 15 para 11.82), that as their project reaches its potential, there will be serious consequences for the >40,000 souls living in Ramsgate (and other Thanet communities). The ExA can help mitigate these consequences by imposing stringent controls on the flight operations at Manston, particularly with respect to the type of aircraft used (eg, forbid aircraft with a QC greater than, say, 2) and constrain the hours of operation (for example, no flights of any description, in or out, late landings, scheduled, unscheduled, delayed to be permitted between 23:00 and 07:00)

James Chappell
Ramsgate Resident
Reference: 20012627

Sent: 09 June 2018 10:38

To: manston@rsp.co.uk

Subject: New Message From RSP

From: James Chappell

Email: xxx

Message:

Hello. In the Note of the meeting between the PI and RSP published 11th May, references are made to wildly differing numbers of ATMs.

Please would you explain, in layman's terms, why 17000 is quoted in one place, and 83000 in another?

Thanks

RSP's reply:

Dear Mr Chappell,

Thank you for your email.

*RiverOak Strategic Partners is meeting with the Planning Inspectorate in the coming weeks and will clarify this, as well as the other points, raised at the last meeting in May. **More information will be made publically [sic] available after this meeting.** (My emphasis)*

Kind regards,

Tom

RiverOak Strategic Partners

Manston Airport consultation team

From: James Chappell

Sent: 15 June 2018 09:28

To: manston@communityrelations.co.uk

Subject: Re: New Message From RSP

Thanks for that.

During the recent Consultation, mention was made of ATMs of the order of 17,000 ("14.1.2 As detailed in Chapter 3, the Proposed Development would support between 10,000 and 17,000 air freight air transport movements (ATM)" - 02-PIER-Volume-II-2018.pdf). If you plan on re-submitting a DCO Application using a figure of 83,000 rather than 17,000 ATMs, will you be offering another period of consultation, given that the envisaged Proposed Development is for an operation which is an order of magnitude greater than the one consulted upon?

Regards

James Chappell

RSP's reply:

Dear Mr Chappell,

Thank you for your email.

*As mentioned previously, RiverOak Strategic Partners is meeting with the Planning Inspectorate to clarify this and **more information will be made publically [sic] available in the application documents** as part of our resubmission.*

Kind regards,

Tom

RiverOak Strategic Partners

Manston Airport consultation team

From: James Chappell

Sent: 26 June 2018 21:12

To: manston@communityrelations.co.uk

Subject: Re: New Message From RSP

Hi Tom:

I note that RSP and the PI had a Project Meeting on 22nd June. Are you now in a position to reply to my two questions, viz:

1) In the Note of the meeting between the PI and RSP published 11th May, references are made to wildly differing numbers of ATMs. Please would you explain, in layman's terms, why 17000 is quoted in one place, and 83000 in another?

2) During the recent Consultation, mention was made of ATMs of the order of 17,000 ("14.1.2 As detailed in Chapter 3, the Proposed Development would support between 10,000 and 17,000 air freight air transport movements (ATM)" - 02-PIER-Volume-II-2018.pdf). If you plan on re-submitting a DCO Application using a figure of 83,000 rather than 17,000 ATMs, will you be offering another period of consultation, given that the envisaged Proposed Development is for an operation which is an order of magnitude greater than the one consulted upon?

Regards

James Chappell

RSP's reply:

Dear Mr Chappell

Thank you for your email.

*We are currently working towards resubmitting our planning application. We understand your interest in Manston Airport and will respond to the points you raise in **our application documents as part of our resubmission, which will be made publically [sic] available for you to view.** Please do keep an eye on the project website for updates as the project develops.*

Kind regards,

Tom

RiverOak Strategic Partners

Manston Airport consultation team

From: James Chappell

Sent: 16 July 2018 23:47

To: manston@communityrelations.co.uk

Subject: Re: New Message From RSP

I note that you have resubmitted your Application.

Are you now in a position to answer the questions I have previously posed?

I look forward to seeing your submission documents.

Regards

James Chappell

RSP's reply:

Dear Mr Chappell

Thank you for your email.

*On Monday, RiverOak Strategic Partners re-submitted its DCO application to the Planning Inspectorate. **The application documents will be made publically [sic] available to view if the application is accepted.** Please keep an eye on the project website for further updates on the application status.*

Kind regards,

Tom

RiverOak Strategic Partners

Manston Airport consultation team