

Manston Airport (TR020002) Reference 20014413 Susan Kennedy

Response to Applicant's answers to Fourth Written Questions

Susan Kennedy



Dear Examining Authority

Please find below my submission in response to the Applicant's answers to Fourth Written Questions.

My response is poor, hurried and brief. For those of us in full time work, the timetable is simply impossible. Reading through 298 pages of detailed questions and responses, thinking, re-reading, analysing and composing a full and comprehensive response in the few hours I have had before the deadline, is not only a gargantuan but a physically impossible task. Consequently, I've had to cherry pick and respond in only a few areas. I cannot emphasise enough how angry this makes me, and doubtless others, who have committed so much time to this process. The process is flawed and this has been hugely exacerbated by an Applicant who submitted a woefully inadequate, inaccessible and unevidenced Application and who has been forced to endlessly iterate and answer questions that could have been unnecessary or briefer given some degree of competence, willingness and regard for the process.

One can only hope, at this very late stage, that the very many areas of concern in this Application, still unanswered, or poorly answered, or inadequately mitigated, will be given the fullest consideration by the ExA. I'm sure they will but throughout this process, it must be noted that ordinary residents, lay people with no expertise in these matters, have conducted Trojan efforts to bring questions, concerns, evidence, documentation and expertise to the ExA's attention. It has been impossible, due to lack of time, money, expertise and deadlines for us to fully, forensically examine every area that we would wish to. I sincerely hope that stones left unturned will be picked over by the ExA.

### G.4.3 ICCAN Corporate Strategy 2019-21 Consultation

In responding to the ExA's question about the extract from ICCAN, the Applicant is dismissive and displays the same disregard and lack of interest that has characterised their application and responses throughout. They say:

*Aviation noise 'can have a detrimental effect on quality of life and health which are difficult to quantify using graphs, metrics, maps or other data'.*

In fact, it's not that difficult. There is a wealth of data that informs as to detrimental effects. There is a wealth of data about the impact of noise in the Manston and wider area from when the airport was operational. The Applicant chooses to present this as unquantifiable, somehow unknowable. This is a choice they make, not a fact.

They say:

*The Applicant recognises that individuals experiencing adverse noise impacts will not necessarily feel that the bigger picture benefits to the economy compensate them as individuals for the noise disturbance. However, it will be for the ExA in the first instance and ultimately the Secretary of State to determine where the balance lies and whether benefits of this nationally significant infrastructure project outweigh the limited harm to a very small percentage of the population.*

ICCAN is clear. Economic benefits do not and cannot compensate. Of course, in this particular case, the economic benefits are far from evident or established. The economic benefits rely solely on the forecasting, nay crystal-ball-gazing, of Dr Sally Dixon. As the Applicant says, it is for the ExA and, ultimately, the Secretary of State, to determine whether this proposal represents any national interest or amounts to a nationally significant infrastructure project. There has been nothing presented during the Examination Period that suggests it is.

### AQ.4.1 Ban on old aircraft

In a previous submission I commented that the Application needed to be watertight in terms of ensuring a ban on older aircraft. The Applicant's response is that '*certain aircraft are effectively banned through the noise Quota Count system*'. A noise Quota Count system that the Applicant is determined to buck, asking as they do that it does not apply from 23.00 to 6.00 meaning no noise protection at all for late-arriving planes. This simply isn't good enough.

### ND.4.31 Passenger forecasts

The Applicant bats away the ExA questions and references other airports and says that their proposed market will '*be largely independent of additional incremental capacity added elsewhere.*' They say that '*an additional 12 million passengers at Luton and Gatwick respectively, most of which will be on routes that are currently under or un-served, will not be competing with routes to core destinations accessible from an airport within 45 minutes of where its users live.*' We are back in the land of make-believe. Residents like myself well remember extravagant forecasts around

passenger numbers from the owners of Manston Airport. One master plan, showing the catchment area of the 6 million passengers promised showed concentric circles around the airport. Of course, the location of Manston means that very significant percentages of each of those concentric circles were in the sea. Surrounded on three sides by water, the ability to attract passengers to Manston appeared to rely on them coming from as far afield as Cambridge or Dorset. Passengers that would have to drive past Stansted, City Airport and Gatwick, even Heathrow, to get to and use a Manston Airport. These passenger forecasts, as derided by previous independent reports, are a nonsense.

#### Ns 4.3 Noise Contours commissioned from the Civil Aviation Authority by No Night Flights

The Applicant says, *'the crude approaches adopted by NNF and Five10Twelve are not truly comparable with the approach adopted in the ES which is considered appropriate and robust'*. As I am sure the ExA will agree, this is not an answer. NNF, and I am sure Five10Twelve, did not rustle up some contour modelling themselves. NNF did not 'crudely' produce some maps. The work was commissioned from the Civil Aviation Authority whom one can feel confident are best able to produce appropriate and robust noise contour modelling. If they are not able to, then one must wonder which organisation in the country can. The appropriate and robust modelling by the CAA simply does not sit well with the Applicant's ES and their brief response here simply seeks to ignore it. This is unacceptable. This Application must be rigorously examined and the impact on residents, communities, neighbourhoods and environments properly weighed in the balance. This has not been done and cannot be done unless comprehensive CAA standard noise contour modelling forms part of that Application and is used in the ES and Noise Mitigation Plan.

#### Ns. 4.6 ATM limits during the school day

The ExA properly asked if the DCO should secure the limits of ATMs during the school day. The Applicant curtly responds with 'no'. It is obvious from concerns raised throughout this examination period that our schoolchildren would not be properly safeguarded under the Applicant's current plans nor its NMP. Should there be limits on ATMs during the school day. Yes.

#### Ns 4.7 Noise Contours

Again, the Applicant ducks the question and implies that the ExA is somehow asking either for what has already been supplied or the impossible. I have written at length previously about the need for full and proper noise contour modelling. Such was that need that NNF commissioned these. The Applicant's interests are not well served by such proper noise contours. The interests of residents are. This Application cannot be considered to have produced a proper ES or NMP without.

The issue of noise contours is a vital one. It is essential that residents within contours of 57dB LAeq should be recognised and compensated. It is essential that

comprehensive contours are built into this Application so that the true, detrimental impact of noise on significant populations can be weighted. I would ask also that the ExA insist that the Applicant provide a comparative summary of UK airports that provide noise insulation compensation as a result of trigger levels below that of the 63dB LAeq offered by the Applicant. In addition, they should be required to provide an overview of those UK airports that are intending to lower their noise contour trigger levels and/or those where there are ongoing consultations and/or planning approved such as Heathrow and Stansted. This Application for a brand-new airport where the impact would be on a newly exposed population should be based on best and improving practice.

#### Ns 4.10 Quota Count Night-time

The Applicant's commitment to reducing the quota count to 2000 on the understanding that it applies only to the night-time period of 06.00-07.00 is not desired or acceptable. The noise quota count is designed to protect from night-time noise. If applied only to the period 06.00-07.00 it provides no protection at all for the period 23.00 – 06.00. Again, this is all smoke and mirrors. At face value, this could seem fine and dandy. No scheduled, time-tabled flights between 23.00 and 06.00 so no quota count needed. Not so. As in a previous submission, I urge the ExA to look at what this means in practice. All late-arriving planes would not be subject to any quota count. There would be no restriction on noise, no restriction on numbers. Residents have lived through this before. We know exactly what noisy, late-arriving planes sound like. We know exactly how regularly and frequently such late-arriving planes can appear. And that was from a far smaller airport. The QC budget is a way of limiting such flights, all flights, during the WHOLE night-time period. A QC budget needs to cover the whole of the night-time. Without this, the Applicant will be able to bring in as many late-arriving planes as they want. It is usual and desirable for an airport to have an ATM limit for the night IN ADDITION to a QC budget. Why has this not been asked for? Why is the Applicant unwilling to commit to an ATM limit during the night-time given their so very-often stated mantra 'we don't want night flights, we don't need night flights'? If an ATM limit and QC budget were applied throughout the night then there is an incentive to have quieter planes, also. With the proposal as it stands, there is no incentive, there is no penalty. This cannot possibly stand. As with plans for compensation in the NMP, local residents are to be treated less favourably than residents near other airports. London City Airport has a ban, for example. I cannot emphasise enough that this proposal, happily offered by the Applicant and seemingly amenable to the ExA provides a loophole for the operator that would see residents suffering potentially all night, every night.

As an appendix, I am attaching a submission from Stone Hill Park. Whilst I understand that they are soon no longer to be owners of the site, the sterling work they have done in highlighting the fundamentally flawed nature of the whole of this Application should not be ignored and I hope will not be now that the compulsory purchase element of the DCO no longer pertains. I was present at the hearing on the socio-economic impact. I have spent many long hours dissecting Dr Sally Dixon's Azimuth report and have found it to be a disturbingly non-academic piece of work that is based more on assumption, conjecture, aspirations and anecdote than

facts. At the hearing, I was impressed with the evidence from Louise Condon and would hope that all her evidence is considered by the ExA. The residents of Ramsgate and beyond have been fed a diet of misinformation and inflated statistics. This is an area of relative deprivation and one that is in dire need of jobs. It is not to be wondered at the some have been persuaded to support this Application on the basis that it will bring jobs. It has clearly been established that the underpinning data used by Dr Sally Dixon was out-dated and should not have been used. Not only was it out-dated, it was used incorrectly. This proposal will not result in the numbers of jobs declared. There is little to no socio-economic benefit to the area against which the significant detrimental impacts need to be weighted. The loss of jobs, from our booming visitor economy, would be inevitable. Ramsgate has recently been highlighted as having the faster rising house prices in Kent. Our town is being regenerated. It does not need or want this airport.

Once again, may I take this opportunity to thank the panel members of the Examining Authority.

Kind regards

Susan Kennedy

5<sup>th</sup> July 2019

## Appendix 1: Submission from Stone Hill Park dated 20<sup>th</sup> June 2019

From: To: Manston Airport Cc: Richard Price Subject: Manston - urgent submission  
Date: 20 June 2019 17:22:38 Attachments: UTT\_18\_0460\_FUL-ES\_VOLUME\_1\_-\_CHAPTER\_11\_SOCIO-\_ECONOMIC\_OMPACTS-2634308.pdf

Dear Case Team We are making our way through the Applicant's Deadline 8 submissions, and consider that it may assist the examination if the Applicant is requested to comment on the following;

In paragraphs 2.14 and 2.21 of the Applicant's Written Summary of Oral Representations put at the Socio-Economic Hearing, the Applicant references that it used the ratios for Stansted and Luton when calculating induced and indirect employment effects of a reopened Manston.

SHP has already made detailed submissions (with supporting evidence) following the SocioEconomics Hearing that set out the factual position on Luton, and the degree to which the assumptions used by the Applicant to assess employment effects are fundamentally flawed (notwithstanding the underlying forecasts are not credible).

However, having reviewed the Applicant's recent submission, SHP consider it important that the ExA has access to factual information in respect of Stansted that contradicts the assertions of the Applicant.

Attached is a copy of Chapter 11 (Socio-Economic Impacts) of the Environmental Statement that formed part of Stansted's 2018 planning application (UTT/18/0460/FUL). The following points are worth noting;

- Paragraph 11.97-11.98: The operational study area used includes eleven local authorities within the East of England region and five London boroughs that have a combined population of nearly 3 million;
- Paragraph 11.64: Both indirect and induced employment has been estimated using appropriate employment multipliers. The employment multiplier is the ratio of direct, indirect and induced employment to direct employment.
- Paragraph 11.65: States that Optimal Economics has reviewed evidence from studies of and use of regional multipliers in the UK including impact studies of airports. These studies identified multipliers within a relatively narrow range of 1.4 to 1.8. The value of the multiplier is influenced by the size and structure of the local economy. Economies which are relatively large in output and employment terms have a greater capacity to create induced employment and so to have a larger multiplier effect than for smaller economies. Optimal Economics has determined that the appropriate employment multiplier with regard to operational employment (including indirect and induced effects) for the study region is 1.8. Note: this

multiplier includes the direct jobs, so there is only 0.8 indirect or induced job to each direct job.

· Paragraphs 11.159 and 11.160: These paragraphs show the employment impacts of the proposed development. Again, it evidences that the assumptions used for Stansted are for only 0.8 indirect and induced job to each direct job. The Applicant's ES is based on 1.8 indirect and induced job per direct job, all of which are assessed to be in the local area - Thanet.

As noted in paragraph 11.65 above, Optimal Economics comment that the multiplier for a smaller local economy (such as Thanet) would be lower than a larger economy of 3 million, and hence this implies a 0.4 local multiplier (i.e. 1.4 minus the 1 direct job). This is consistent with the evidence in paragraph 20 of the York Note appended to SHP's Written Summary of Oral representations put to the Socio-Economics Hearing.

This demonstrates that the Applicant's misapplication of multipliers has overstated the number of Year 20 indirect and induced jobs in Thanet by 4,784 (i.e. 6,151 less 1,367). NB. This lower number of indirect / induced jobs (1,367) also ignores the fact the Applicant's starting position is wrong as (i) it has applied an inappropriate employment density for direct jobs and (ii) it requires its forecasts to be achieved.

In view of the very short time left in the examination, SHP consider that it may assist the examination if the Applicant was requested to comment on the Chapter 11 (Socio-Economic Impacts) of the Environmental Statement that formed part of Stansted's 2018 planning application (UTT/18/0460/FUL) and explain and justify the differences between the assumptions the Applicant has used for local and regional indirect and induced employment and those used by Stansted.

Best regards

Jamie

Jamie Macnamara Stone Hill Park Ltd