

**MANSTON AIRPORT DEVELOPMENT CONSENT ORDER EXAMINATION
SUBMISSION TO DEADLINE 10:**

**Comments on Information requested by the ExA and received from the
Applicant to Deadline 10
and
NOISE CONTOUR CAP**

1. We note the Applicant's continued use of the a noise contour cap as a robust mitigation measure in relation to mitigation measures with Natural England and as identified in the of the Updated Register of Environmental [\[REP8-018\]](#).
2. We draw your attention to Paragraph 1.12
"1.12 The forecasts for the area enclosed by the 50dB(A) Leq16hr (0700 2300) contour shall not exceed 35.8 sq km, and the area enclosed by the 40dB(A) Leq8hr (23.00-07.00) contour shall not exceed 47.4 sq km. Future calculation, monitoring and reporting of the application and any breaches to the contour is discussed in Section 7 below".
3. The Applicant has not provided a table for each Year forecasts at 2,6 and 20 and the estimated areas, population and households.
4. As the Examining Authority will be aware Five10Twelve CAA contours at [\[AS-120\]](#) 70%W/30%E identified 200 households at >63 SOAEL¹ in year 20 as opposed to the Applicant's 115 household at >63 SOAEL in year 20.

50 dB (A) LAeq 16 hr and 40dB(A) Leq8hr (23.00-07.00) contour shall not exceed 47.4 sq km.

5. We respectfully state that the night time period noise contour cap for one hour of flights is outrageous. It would be outrageous for 8 hours of flights. It would not provide any effective control of operations whatsoever.
6. The Applicant is using areas that marry up with Year 20 with the Fleet mix at Appendix 3.3 of [\[APP-044\]](#) to set a noise contour cap for Year 1 and each consecutive year.

¹ Table 6 Page 5 [\[AS-120\]](#)

7. Notwithstanding the above at point 4, our table commissioned from the CAA ERCD shows for 70%W/30%E at Year 20, a estimated area (km²) >51 of **30.6** (THIRTY POINT SIX KILMETRES SQUARED).
8. The Applicant's proposed mitigation of 35.8 sq km for **ANY** year is higher than that amount for year 20.
9. We respectfully fail to see how this in any way works as a mitigation measure. It would not provide any effective control of operations whatsoever.
10. Pursuant to Paragraph 1.18 of [[REP8-018](#)], and using the same fleet mix as set out in Appendix 3.3 of [APP-044] which is based on the forecasts in the Azimuth report, residents would have to wait **over 20 years during the day and even longer at night until this mitigation measure of contour based noise limit capping was engaged²**.
11. It is therefore an utterly meaningless mitigation measure and will have zero post mitigation effect unless the Applicant changes the fleet-mix significantly which would have an adverse and not assessed environmental impact.
12. The Statutory Bodies that have relied on this measure can no longer be relied upon for agreement with the proposed Scheme.
13. The fact that we are in a position to evidence why this mitigation is so terribly inappropriate is because we happen to have commissioned noise contours from the CAA ERCD at our expense.
14. We cannot afford to run independent checks on all of the Applicant's Environmental Statement nor should we be in the position of having to do so.
15. **We respectfully submit on this basis the Application must be refused.**

² *Ibid*