

**MANSTON AIRPORT DEVELOPMENT CONSENT ORDER EXAMINATION**

**SUBMISSION:**

**COMMENTS ON RESPONSES TO ExA's FIFTH WRITTEN QUESTIONS**

**TR.5.1**

- We respectfully remind the ExA of the Ricardo report for Thanet District Council and the Submission of Thanet District Council with the said report attached [REP8-029].
- The Applicant has responded in NS2.16 by considering the distribution of flights over the day (increased ATMs around opening and closure of the airport). The ES used an even distribution of ATMs. With an even timetable there is 2.25 ATMs in 30-minutes whereas with the distribution of flights over the day (increased ATMs around opening and closure of the airport the ATMs during school hours are reduced. The approach in the ES is considered to be acceptable for the LAeq,16hr though the LAeq,30mins timetable clarification in NS2.16 is welcomed to confirm the LAeq,30mins is not higher than presented in the ES.
- The Ricardo report recommends that the DCO secures the limits of ATMs during the school day periods based on the analysis in Table 1 of NS2.16 to ensure that the potential impacts are not worse than modelled.
- In light of this Ricardo report evidence, we respectfully recommend that Requirement 19c to read:  
*"No passenger air transport departures will take place between the hours of 09.00 and 11.30. There shall only be one passenger air transport departure between the hours of 11.30 [REDACTED] and 12.00. There shall also only be one scheduled passenger air transport arrival between the hours of 07.00 and 08.00".*

- We respectfully state that the draft DCO must be based on evidence and reflect what has been assessed in the ES.
- The Applicant has not provided significant and material information to enable the Examining Authority and the Secretary of State to take into account the proposed development's potential adverse impacts (**including any longer term and cumulative adverse impacts**) as well as any measures to avoid, reduce or compensate for any adverse impacts (paragraph 4.4 Airport NPS).
- In this context, environmental safety, social and economic adverse impacts have not been considered at the national, regional and local level (paragraph 4.5 Airport NPS).