

From: [REDACTED]
To: manstonairport@pins.gsi.gov.uk
Cc: [Richard Price](#)
Subject: Statement of concern
Date: 09 July 2019 12:38:49

Dear Planning Inspectorate,

As a Ramsgate resident, and one who lives under the likely Manston flightpath should it reopen, I'm writing to make some comments about Riveroak Strategic Partners (RSP) and the Manston Airport DCO.

I'm initially referring to the Applicant's Answers to Fourth Written Questions, dated 29/06/19 (TR020002/D9/FWQ Examination Document).

At Ns 4.10, under the heading Quota Count Night Time, the Applicant says:

“The applicant is therefore willing to reduce the quota count to 2000 (365*5 being 1825), but this would be on the basis that late-arriving, emergency and humanitarian flights would be excluded from that total. If they are to be included as at present, then the Applicant would wish to keep the original figure of 3028.”

Applicant's Response: The NMP (at TR020002/D9/2.4) has been amended to reflect this, at paragraph 1.8.

If the Examining Authority allows this, it will be exposing local residents to the threat of an unlimited number of night flights.

There would be nothing to stop the Applicant from allowing 'late' arrivals to land at any time, at any noise level, between 2300 and 0600. This has never been consulted on, nor has it been modelled by the Applicant and presented for examination to the Examining Authority.

This has the potential to be extremely damaging to residents' health, well-being and the local economy. It is completely and utterly unacceptable.

I, therefore, wish to object to the Examining Authority allowing the Applicant's suggestion at Ns.4.10 to remain in the Noise Mitigation Plan for the Manston Airport DCO.

The Applicant has consistently said to the public that it does not need night flights and that there will be no night flights. Let us hold the Applicant to that in the clearest possible terms in the Noise Mitigation Plan and in the draft DCO: no flights, scheduled, chartered, or otherwise labelled, late or on time, between 2300 and 0700.

In addition to this, I have to say that RSP has not, at any stage either prior to or during the DCO process, inspired confidence that it takes its responsibilities seriously.

I appreciate it's late in the day to say this, and that these comments might fall outside the current remit, but the DCO process was supposed to be front-loaded, in which all the impact assessments, business modelling and economic forecasts were presented for evaluation from the start. This is so all the issues could be considered in a fair and balanced manner.

However, RSP's submissions have been very unsatisfactory. Too often, they're opaque, incomplete or just hopelessly optimistic. In my opinion, its projections of future economic

gain are as unrealistic as its engagement on the disbenefits is disingenuous.

RSP's noise profiles, impact assessments and night flight QC assumptions were released near the end of the DCO process, in my view confirming the belief held by many that the Applicant is an unreliable player whose conduct disqualifies it from the stewardship of such a significant scheme. Based on its track record, I'd personally struggle to entrust the Applicant with the care of my next-door-neighbour's cat, let alone the development of a major airport.

But, in truth, we shouldn't even be having this conversation. We face a climate emergency. The UK is a signatory to the Paris Accord and we should be looking to contain, not expand, the aviation industry, which accounts for around 15% of total global emissions.

As you're no doubt aware, the UK is also a signatory to the Aarhus Convention, and will continue to be if and when Britain finally leaves the EU. This gives ordinary people the legal right to:

- receive environmental information held by public authorities
- participate in environmental decision-making – especially plans and projects that affect the environment – so that public feedback is given due consideration
- challenge public decisions that appear to give neither of these rights, nor environmental law, due weight

Given the Applicant's track record, its unconvincing business case and the wider environmental context, I'd suggest that any decision to approve the DCO will provide ample and compelling grounds for legal challenge and judicial review.

That surely speaks volumes about the viability of this application, or lack thereof.

Yours faithfully

Peter Batt

Journalist, commentator and author of [REDACTED]

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