The Rt Hon Grant Shapps The Secretary of State for Transport Department for Transport Zone 1/18, Great Minster House 33 Horseferry Road London SW1P 4DR

BY EMAIL:

transportandworksact@dft.gov.uk Cc: <u>Rob.Pridham@dft.gov.uk</u>

20 December 2019

Dear Sir

RiverOak Strategic Partners ("the Applicant") Proposed Manston Airport Development ("Manston") Development Consent Order ("DCO")

<u>RE: INCONSISTENCIES IN DCO APPLICATION IN TERMS OF SCALE, SIGNIFICANCE AND</u> <u>ALLEGED BENEFITS OF PROPOSED DEVELOPMENT AND OPERATIONS AT MANSTON</u> <u>AIRPORT</u>

During recent CAA focus group meetings, the Applicant has positioned itself with small airports and a gliding club rather than as a nationally strategic airport (aspirational or otherwise). This is inconsistent with the DCO application. The Applicant is engaging with a cargo airline (with a fleet of only 4 aircraft) that had formerly used the airport during its small-scale operations and whose fleet consists of older and noisier planes than used for the DCO Environmental Statement. The post DCO Examination new changes will impact Nitrogen Dioxide, Particulate Matter and Sulphur Dioxide concentration levels in the AQMA and therefore the development is not consistent with the local quality action plan (AQAP).

Further, the Applicant's failure to assess the credible worst case scenario will result in substantial delays.

THE APPLICANT IS POSITIONING ITS PROPOSED DEVELOPMENT WITH SMALL AIRPORTS

- 1. As you are aware, the Applicant has applied for a Development Consent Order on the basis of its claims that the proposed development will qualify as a Nationally Significant Infrastructure Project (NSIP).
- We respectfully draw your attention to the recent Aviation Focus Group meeting held in Margate on 4 November 2019 by the Applicant and posted on the CAA website on 6 December 2019 (enclosed).
- 3. As you will be aware the Applicant has not formally submitted its airspace change proposal and is said to do so in May 2021. This will start the 110 week CAP 1616 process.
- The Applicant invited the following small airports and a gliding club to this Aviation Focus Group meeting: Maypole Airfield, Biggin Hill Airport, Rochester Airport and Kent Gliding Club¹.
- 5. These are all very small airports devoted to general aviation, specialist aviation and gliding rather than the type of business the Applicant aspires to undertake in dedicated freight operations.
- 6. Due to the former airport's location, the IFP (routes into and out of the airport) should align with Future Airspace Strategy Implementation - South (FASI(S)) and the London Airspace Management Programme (LAMP).
- 7. There are 17 other airports subject to South (FASI(S)) and many of these are airports that the Applicant made a number of inaccurate statements about in the DCO Examination.
- The Applicant did not invite these would-be competitor airports for example Gatwick , Heathrow, Stansted - to this Aviation Focus Group despite these airports also being subject to South (FASI(S)).

¹ CAA: Aviation Focus Group Meeting Minutes

EVIDENCE SUGGESTS THE APPLICANT'S BUSINESS MIX IS INCONSISTENT WITH ITS DCO APPLICATION AND OPERATIONS OF A NSIP AIR CARGO HB

- 9. Throughout the DCO examination, the Applicant made numerous claims of interest from major international airlines, operators and e-commerce businesses. No evidence was provided at any stage to support the Applicant's claims of interest from these major carriers or operators.
- 10. The **only** airline that the **Applicant invited** to the Aviation Focus Group and for whom any evidence of interest exists was Magma Aviation², with a total of four aircraft in its fleet.
- 11. Magma Aviation's average age fleet is 25.8 Years³.
- 12. These aircraft are therefore old aircraft.
- 13. Aircraft are certified to comply with the agreed international noise standard in force at the time it was manufactured. So older aircraft have less stringent standards than aircraft manufactured today.
- 14. Page 48, Table 3.1 of the Updated Register of Environmental Actions and Commitments⁴ specifically states that the Applicant will "*ban older, dirtier aircraft*".
- 15. The Applicant's Environmental Statement was predicated on this total ban.
- 16. The Applicant has not shown any evidence of any cargo airline relocation or locating itself at Manston Airport (if reopened).
- 17. Outside of the DCO Examination process the Applicant is inviting and engaging with an airline operator Magma Aviation whose fleet is entirely made up of older aircraft.
- 18. It is therefore reasonably foreseeable that airline operators with older aircraft are most likely to use Manston Airport (if reopened).
- 19. The Applicant clearly has not assessed "*likely significant effects*" as it stated in the Applicant; Overall Summary of Case to the UK Planning Inspectorate⁵ or a "*worst credible*" scenario in terms of Environmental impacted as stated to the CAA in the Applicant's CAA Interface DCO

² CAA: Aviation Focus Group Meeting Minutes

³ <u>https://www.planespotters.net/airline/Magma-Aviation</u>

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR02000 2-004663-Updated%20Register%20of%20Environmental%20Actions%20and%20Commitments.pdf

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR02000 2-004668-Applicant's%200verall%20Summary%20of%20Case.pdf

Document⁶ and or even the "*worse case scenario for the current DCO application*⁷" as the Applicant stated at the recent CAA Focus Group meeting.

- 20. Instead the Applicant presented the Environmental Statement using the best case scenario.
- 21. The loudest planes are the oldest⁸.
- 22. Further, Natural England confirmed in its comments on the Report of the Implications for European Sites⁹ that as "the noisiest planes that used to fly from Manston would not be allowed at the new airport" it can partly "resolve its uncertainty over noise disturbance impacts on turnstones in Pegwell Bay".
- 23. It is of note that Magma Aviation used to fly from Manston and would fall within the category of *'noisiest planes that used to fly from Manston'*. As such Natural England's comment during the DCO Examination was based on inaccurate and/or misleading information.

OPERATIONAL LIMITATIONS OF PROPOSED DEVELOPMENT

- 24. Two of the planes in Magma Aviation's fleet of four aircraft, (737-400F), have a runway requirement of 2,300 metres¹⁰.
- 25. The other two planes (747-400BCF) have a runway requirement of 3,200 metres¹¹.
- 26. Manston Airport (when open) had only the 29th longest runway in the UK (18th if looking at currently active runways only)¹².
- 27. Perhaps more crucially Manston Airport's runway is 2,752 metres (9,030 feet) long. This means that as "most of the freight booked with Magma Aviation will fly on [Magma Aviation] exclusively operated B747-400BCF..."¹³, Magma Aviation will not be able to use Manston

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https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR02000 2-002460-7.5%20-%20CAA%20Interface%20Document.pdf

⁷ CAA:Non- Aviation Focus Group Meeting Minutes

http://www.airportwatch.org.uk/2013/07/musicians-look-to-clean-up-their-acts/ 9

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR02000 2-004583-Natural%20England%20comments%20on%20RIES_1Jul19.pdf

¹⁰ <u>https://magma-aviation.com/aircraft-specifications/</u>

¹¹ <u>https://magma-aviation.com/aircraft-specifications/</u>

¹² <u>http://www.ukairfields.org.uk/runway-lengths.html</u>

¹³ <u>https://magma-aviation.com/aircraft-specifications/</u>

Airport for 50% of its services (if relocated to Manston) and it will not be able to use it for the aircraft used for the largest proportion of its services.

28. Magma Aviation is currently located at Gatwick Airport which has the 4th longest runway and a runway which at 3,256 metres (10,683 feet) accommodates all of Magma's Aviation fleet mix.

LOCATION	COUNTY (Historic)	RUNWAY	LENGTH (ft)	LENGTH (miles)	STATUS	ICAO	IATA
Heathrow	Middlesex	09L / 27R	12,799 ft	2.42 miles	Active	EGLL	LHR
Heathrow	Middlesex	09R / 27L	12,304 ft	2.33 miles	Active	EGLL	LHR
Manchester	Cheshire	05R / 23L	10,751 ft	2.04 miles	Active	EGCC	MAN
Gatwick	Sussex	08R / 26L	10,685 ft	2.02 miles	Active	EGKK	LGW
Bedford (Thurleigh)	Bedfordshire	09/27	10,484 ft	1.99 miles	Disused	EGVW	
Boscombe Down	Wiltshire	05/23	10,529 ft	1.99 miles	Active	EGDM	
Shannon	County Clare	06/24	10,499 ft	1.99 miles	Active	EINN	SNN
Elvington	Yorkshire	08/26	10,126 ft	1.92 miles	Disused		
Birmingham	Warwickshire	15/33	10,010 ft	1.90 miles	Active	EGBB	BHX
Brize Norton	Oxfordshire	08/26	10,033 ft	1.90 miles	Active	EGVN	BZZ
Bruntingthorpe	Leicestershire	06/24	10,032 ft	1.90 miles	Disused		
Chelveston -	Northamptonshire	04/22	10,022 ft	1.90 miles	Disused		
Greenham Common	Berkshire	10/28	10,054 ft	1.90 miles	Disused		
Stansted	Essex	04/22	10,016 ft	1.90 miles	Active	EGSS	STN
Fairford	Gloucestershire	09/27	10,005 ft	1.89 miles	Active	EGVA	FFD
Machrihanish	Argyll	11/29	10,002 ft	1.89 miles	Active	EGEC	CAL
Manchester	Cheshire	05L / 23R	9,998 ft	1.89 miles	Active	EGCC	MAN
Upper Heyford	Oxfordshire	09/27	9,588 ft	1.87 miles	Disused	EGUA	
Prestwick	Ayrshire	12/30	9,799 ft	1.86 miles	Active	EGPK	PIK
Doncaster (Finningley)	Yorkshire	02/20	9,485 ft	1.80 miles	Active	EGCN	DSA
East Midlands	Leicestershire	09/27	9,486 ft	1.80 miles	Active	EGNX	EMA
Mildenhall	Suffolk	11/29	9,217 ft	1.74 miles	Active	EGUN	MHZ
Belfast (Aldergrove)	Antrim	07/25	9,141 ft	1.73 miles	Active	EGAA	BFS
Marham	Norfolk	06/24	9,135 ft	1.73 miles	Active	EGYM	MRH
Wethersfield	Essex	10/28	9,091 ft	1.72 miles	Disused		
Alconbury	Huntingdonshire	12/30	9,003 ft	1.71 miles	Disused		
Cottesmore	Rutland	04/22	9,008 ft	1.71 miles	Disused	EGXJ	
Gaydon	Warwickshire	05 / 23	9,053 ft	1.71 miles	Disused		
Manston	Kent	10/28	9,030 ft	1.71 miles	Disused	EGMH	MSE

ENVIRONMENTAL STATEMENT AND AIR QUALITY

29. The Applicant stated at the CAA Aviation Focus Group meeting that it:

"is looking at between 4-8 movements per hour, and states that there will be a degree of bunching. There is a possibility of concentration in the morning 8 o'clock period".

30. As you will be aware the Environmental Statement and impact on Air Quality was modelled on the basis of:

- a. 2 flights in a half hour period $(4 \text{ flights an hour})^{14}$,
- b. No bunching; and
- c. No concentration around a particular hour.
- 31. However, the Applicant **post the DCO Examination** is stating that there will be:
 - a. Up to 8 flights per hour¹⁵,
 - b. Bunching¹⁶; and
 - c. Concentrated around a particular hour¹⁷.
- 32. Consequently the potential impacts **will be worse** than as modelled.
- 33. These post DCO Examination new changes to flight frequency, landing and take-offs will impact the Transport Assessment and traffic generation methodology which was assessed on misleading and/or inaccurate information supplied by the Applicant. These new changes will impact air quality. The potential impacts **will be worse** than as modelled. We do not know if the impact will be minor, moderate or major.
- 34. In relation to air quality, there are 3 relevant parts of government policy National Air Quality Plan, National Air Quality Strategy 2019, Local Air Quality (AQMAs) and Local Planning System.
- 35. In relation to air quality, EU Ambient Air Quality Directive 2008/50/EC implemented in the UK through Air Quality Standards Regulation 2010 imposes duties upon the Secretary of State to achieve compliance. Compliance was required by 2010 and the UK is currently in breach of the Directive.
- 36. As you will be aware, local authorities have a duty under Part IV Environment Act 1995 to assess whether air quality objectives are being achieved or likely to be achieved.
- 37. Where objective is **not being achieved** or likely to be achieved the Local authority must designate an Air Quality Management Area (AQMA).
- 38. One of Thanet District Council's AQMA is High St, St Lawrence¹⁸ which is directly under the proposed flight path with over flying planes at an altitude of some 200-300 feet. This is now known as the Thanet Urban AQMA¹⁹.

¹⁴

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR02000 2-004562-Thanet%20District%20Council%20-%20response%20to%20ExQ4%20-%20Manston%20Airport. pdf

¹⁵ CAA: Aviation Focus Group Meeting Minutes

¹⁶CAA: Aviation Focus Group Meeting Minutes

¹⁷ CAA: Aviation Focus Group Meeting Minutes

¹⁸ <u>https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=280</u>

¹⁹ https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=280

39. As you will be aware under the National Planning Policy Framework paragraph 124

"Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan."

40. The post DCO Examination new changes will impact Nitrogen Dioxide, Particulate Matter and Sulphur Dioxide concentration levels in the AQMA and therefore the development is not consistent with the local quality action plan (AQAP).

ENVIRONMENTAL STATEMENT and REFUSED AIRSPACE

- 41. As you will be aware, we and many others raised concerns throughout the Examination and in representations after the Examination that the noise contours and information circulated and used by the Applicant in the DCO Examination was inaccurate.
- 42. It is of note that one of the invitees to the non-Aviation Focus Group held by the Applicant on 5 November 2019 states:

"He has been worried about the nature of the support for the regeneration of Manston airport, as there are many people who are in favour of it, but [he] thinks the **map showing the routes out of Manston** will create backlash because **it is not what they thought they were getting**. **We never had the noise issue before and this will upset local people**. He stated that he understands that you are managing the air traffic levels but this is a significant expansion and if public support is important then [he] believes that Manston has **started off in the wrong manner**."

43. The Applicant responds to this concern by stating to the CAA event that the "*worst case had to be assessed in the DCO application...²⁰*".

²⁰ CAA: Non-Aviation Focus Group Meeting Minutes

 44. This is at best misleading and at worst an outright lie, the Applicant has stated in its Overall Summary of Case to the UK Planning Inspectorate²¹ at paragraph 11:

"There have been suggestions that the Applicant should have assessed a worst case scenario, but that is not correct - an **Environmental Statement assesses 'likely significant effects**'. "

- 45. We and many others evidenced throughout the Examination and in late representations that the noise contours provided to the Examining Authority were inaccurate and were based on a best case scenario using incorrect fleet mixes, new modern planes, incorrect numbers of Air Traffic Movements, preferred routes etc.
- 46. As you will be aware, this approach taken by the Applicant means the Environmental Statement is inaccurate.
- 47. The Applicant's CAA Interface Document²² confirmed that the CAA agreed that the Environmental Statement for the DCO could be used for the CAA Airspace Change process because the Applicant's Environmental Statement **will be based on a credible worst case scenario.**
- 48. The Applicant's actions of assessing the (alleged) likely significant effects means that it is significantly likely that airspace will be refused or, at best, delayed until an Environmental Statement based on a credible worst case scenario is provided to the CAA.
- 49. This will have far reaching implications as to deliverability of the proposed development, implications to the Report of the Implications for European Sites and the further financial implications to mitigation costs. Five10Twelve's commissioned noise contours by the Environmental Research and Consultancy Department of the Civil Aviation Authority demonstrated an increase of 174% more properties affected based on the 63 dB LAeq (Significant Observed Affect Effect Level).
- 50. It is also of note that Thanet District Councillors opposed to the proposed cargo airport were not invited²³ to the non-Aviation Focus Group or to engage in the design process.

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https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR02000 2-004668-Applicant's%200verall%20Summary%20of%20Case.pdf

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR02000 2-002460-7.5%20-%20CAA%20Interface%20Document.pdf

²³ Written evidence of Thanet District Councillors not invited to the non-Aviation Focus group will be supplied to the CAA. We know of at least 6 Thanet District Councillors who complained directly to the CAA of their exclusion from this focus group.

CONCLUSION

The inaccurate Environmental Statement would materially and significantly affect all Interested Parties' Statement of Common Grounds including but not limited to Public Health England, Natural England and Historic England as well as all Local Impact Reports submitted to the ExA pursuant to Sections 60 Planning Act 2008²⁴. The post DCO Examination new changes will impact Nitrogen Dioxide, Particulate Matter and Sulphur Dioxide concentration levels in the AQMA and therefore the development is not consistent with the local quality action plan (AQAP). The Applicant's actions of assessing only the (alleged) likely significant effects means that it is significantly likely that airspace will be refused or, at best, delayed until an Environmental Statement based on a credible worst case scenario is provided to the CAA. This will have far reaching implications to the development and its deliverability and viability.

Enclosures:

CAA Aviation Focus Group Meeting Minutes

CAA Non-Aviation Focus Group Meeting Minutes

²⁴ This further impacts sections 104 and 105 of the Planning Act 2008.

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Manston Airport - Aviation Focus Group Meeting Minutes

Date	4 th November 2019		
Location	The Sands Hotel, Margate		
Project/Client	RiverOak Strategic Partners		
Purpose	 RiverOak Strategic Partners and aviation specialist, Osprey Consulting Services held a focus group with aviation stakeholders in order to: explain the process for developing proposals for Airspace Design and Procedures for Manston Airport discuss and gather feedback from stakeholders on constraints that will be taken into account in producing Airspace Design Principles that will shape future proposals for airspace operations at Manston Airport initiate a discussion and answer any questions from stakeholders regarding completing the questionnaire that was sent in advance to the focus group meeting. 		
Attendees	 Maypole Airfield Maypole Airfield NATS Biggin Hill Airport Magma Aviation Magma Aviation Rochester Airport Kent Gliding Club Osprey Consulting Services Osprey Consulting Services Copper Consultancy 		

Agenda Item	Summary	Speaker
Night Flights	Not germane to design principles but would Manston Airport aspire to night flights. Confirmed that at the moment this wasn't the case as explained in the current Development Consent Order (DCO) application.	
Legacy Failings	Were there were any legacy failings; the biggest complaint Magma Aviation had when they indirectly operated at Manston previously was Aerodrome noise. Confirmed that there were only generic problems with legacy, nothing specific to the area.	
Aircraft choice	What planes would be in use, set that stated that Manston would operate modern airplanes, but there might be some legacy aircraft and that Manston procedures would be designed to provide safe flexibility.	=
Westerly Wind	Were any plans to do something like San Francisco airport using a westerly wind. Stated that when the runway direction wind component was below 10 knots Manston would operate noise preferential runway system whereby commercial operators would be encouraged to take-off to, and land from, the west. Therefore, over an extended period 70-80% of commercial landings and take-offs would avoid flying over Ramsgate. Departure and arrival tracks will be guided by the 'swathes' outlined in the current DCO application.	
Maypole Airfield	Maypole airfield and Manston airports extended centre lines intersect, what plans are in place to harmonise activities? Extended that there no plans as of yet and would like to hear from Maypole in regard to what Maypole procedures should be considered, perhaps in a design principle or in any future agreements. A design principle should be one that considers and mitigates how each aerodrome interacts with each other and that departures and arrivals from west at Manston should take into account operations at Maypole airfield.	
General Aviation	Not germane to design principles but is Manston is planning to operate General Aviation? explained that it shouldn't be discounted, but it's not a core part of what is being considered now.	
Freight Industry	A longer arrival/departure time to decrease noise would be off- putting to the freight industry. He points out that even small margins in regard to fuel-use equate to a lot of money over time and can be a deciding factor for many airline operators.	
IFP approaches	Instrument Flight Procedures (IFP) approaches gave certainty about where big aircraft were going to be and that if Manston is going to have a spread of possible routes, there will be some conflict here.	

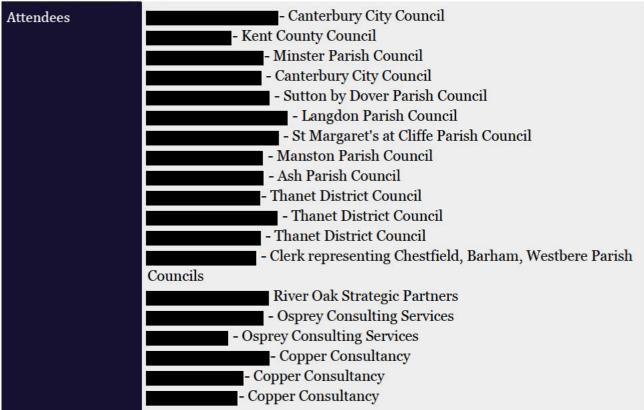
Agenda Item	Summary	Speake
	stated that this is something that needs to be captured in a design principle.	
General Aviation	Airspace has been lost at Rochester airport, and that Southend has taken a lot. The Isle of Sheppey has previously being a great training area but is now quite hard to work in. Previous Manston airport engagement, prior to closure, was very aggressive, in regards to sports & recreation General Aviation (GA (S&R)), and that a new culture would be an opportunity for GA and Manston to work together. He would like Manston to introduce a GA runway.	
Engine out case	Is a lot of consideration is given to the engine-out case? Confirmed that there's is consideration given in terms of pure design. Type A (commercial engine-out) surfaces will be defined considered in the operational safeguarding of the airport and its safe operation.	=
Concentration of movements	He assumes Manston airport will have a vast concentration of movements in the morning due to the nature of the businesses that will operate in and out of it. Confirmed that Manston is looking at between 4- 8 movements per hour, and states that there will be a degree of bunching. There is a possibility of concentration in the morning 8 o'clock period.	
Number of movements	How many movements Manston is looking at? confirm that it will be around 25,000 per annum as proposed in the DCO movement count.	=
Maintenance Possibilities	Not germane to design principles but what are the maintenance possibilities? Is Manston looking to take any of the load from City, Gatwick and larger hubs on the ground?	-
Extra Airspace	Will any extra airspace be needed other than an Aerodrome Traffic Zone (ATZ). confirmed that the requirement for Controlled Airspace s not part of this CAP1616 application. The Statement of Need refers to IFPs and the ATZ.	
Physical Infrastructure	Not germane to design principles but will there be any changes to the physical infrastructure in regard to changes in length <i>sic (of runway)</i> . Confirmed that there will be no change in runway length, just some resurfacing. Stated that the biggest single change will be the building of 19 parking stands.	

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Manston Airport: Non-Aviation Focus Group Meeting Minutes

Date	5 th November 2019		
Location	The Oak Hotel, Ramsgate		
Project/Client	Manston Airport/ RiverOak Strategic Partners		
Purpose	 RiverOak Strategic Partners and aviation specialist, Osprey Consulting Services held focus groups with non-aviation stakeholders in order to: explain the process for developing proposals for Airspace Design and Procedures for Manston Airport discuss and gather feedback from stakeholders on constraints that will be taken into account in producing Airspace Design Principles that will shape future proposals for airspace operations at Manston Airport initiate a discussion and answer any questions from stakeholders regarding completing the questionnaire that was sent in advance to the focus group meeting. 		

Afternoon Session 2 pm - 4pm



Agenda	Summary	Speaker
Westerly departures	Why only westerly departures to the North to reduce noise issues haven't been considered. Stated that no designs have been finalised and this is all open to the future consultation. He reminded the group that different options for which direction to go on departure have been explored. These were the worst case scenarios for the current Development Consent Order (DCO) application.	
Noise	A school in Ramsgate that has a noise monitor that recorded any noise over 90 decibels from planes that came into land at Manston. He stated that he finds it hard to believe that the noise levels won't be this high again. Solution points out that the noise assessment was covered in the DCO and reminds the group that these probably would've been older planes that were considerably noisier.	
General Aviation	Not germane to design principles but at this stage in the process would you (RSP) discuss accommodating General Aviation (GA). Confirms that GA (Sports & Recreation) will be taken into account to an extent, but flight procedures will be purely for commercial aviation.	
Noise	Is take-off noisier than landing. Second states stated that take-off is considerably noisier, as more power is needed to take	

Agenda	Summary	Speaker
	off, whereas during landing an aircraft will have a much lower power setting.	
Process	Not germane to design principles but why are there so many stages in the process and why isn't it easier to return Manston to a working airportexplained the airspace modernisation strategy has had an impact on the process, meaning that there are now more procedures to be followed and other elements that have to be taken into accountalso explained that the movement from beacons to GPS/GNSS mean that all airports are going through some sort of airspace change process reminded the group that if Manston had carried on operating as an airport it would still be going through some formal change process to modernise the airport operations at a similar time to now.	
GPS Issues	The Cllr questions the reliability of GPS, stating that his experience as a navigator had made him aware of the issues that occur when multiple GPS systems interact. Confirmed that Manston's procedures will be designed with great attention to detail incorporating ICAO compliant design requirements for GNSS guidance. Flight management systems will be able to integrate with these designs in a safe and expeditious manner.	
Issues with engagement	All the issues are trade-offs; but nobody knows the best combination. Sector stated they're working on multiple airport projects and that they understand that each one is unique. There is no right answer and this is why they initially engage, as required by CAP1616, the specific communities to find their views.	
Issues with engagement	How are members of the community qualified to make such a big decision about flight paths. The path responded by stating that Manston wants to build schemes that are for the community. The communities should shape the design principles as long as their desires are realistic. The design is a balance, as previously discussed, between practicality and the community requirements; some might be contradictory, but that dynamic allows a degree of measurement in satisfaction of each design principle.	

Agenda	Summary	Speaker
3 Options	Are only three options, urban, rural and over the sea?	
Emissions	Flying the most direct route will help reduce emissions which is central to the current political climate. Constitution agreed, stating that it is a highly valid point but it is one of a range of factors that will influence a decision.	-
Issues with engagement	Is the process is interested in her as an individual or a member of her parish council. Stated that the CAA is interested in people on the ground; you as a democratic representative of a parish. The public will be able to make comments in the future and during consultation on the CAA portal. The consultation at the end of next year will ensure that everyone has the opportunity to provide their thoughts.	
Consultation	asks to provide detail on what form the public consultation will take and what information will be provided to the public. stated that all of the focus group principles will be available in the consultation. All of the info, designs, environmental and economic assessments will be available on the website and CAA portal during consultation. There will be events and access through the CAA airspace change portal for the public to be involved. There will be plenty of chances to provide feedback.	
Consultation	Is the consultation for individuals or the council responded by stating it is for both and that consultation next year will provide everyone with the opportunity to give their view on the airspace project. goes on to ask if the questionnaires are for the council. Goes on to ask if the questionnaires are for the council. Confirms that today's questionnaire is for the council to provide feedback, but that they do encourage you to get input from your colleagues and the local community. We have identified the best point of contact for communities is the democratic representative councils. Goes and states that he will be having a Parish Council meeting to diamage where up an with this project.	
Community Support	discuss where we go with this project. Whilst not germane to design principles he has been worried about the nature of the support for the regeneration of Manston airport, as there are many people who are in favour of it but I think that the map showing the routes out of Manston will create backlash because it is not what they thought they were	

Agenda	Summary	Speaker
	getting. We never had the noise issue before and this will upset local people. He stated that he understands that you are managing the air traffic levels but this is a significant expansion and if public support is important then I believe that Manston has started off in the wrong manner. In the mass of the group that it is important to remember that nothing has been finalised yet and this is a CAA process; this should be reiterated to communities. The worst case had to be assessed in the DCO application, but there may be better options, that satisfy local design principles.	
Consultation process	He is wary of the consultation process as they're only as good as the questions they ask. He said that he's concerned about that if you are answering the questionnaire in your own voice or on behalf of your community. The consultation could be distorted. It is difficult to get people to read the information and give their feedback. Solution stated that this is true and the CAA and DfT are aware of that. This is why we have this time for engagement before our larger consultation period. The Cllr further stated that as we (Councillors) represent their community and in his parishes case they took a majority vote that they were supporting the reopening of the airport. We can't speak to everyone, but this is how democracy works.	
Questionnaire distribution	Is the questionnaire restricted or can it be distributed? stated that questionnaires can be distributed within your council but it cannot be passed to other councils even if you are a member of both.	
Thames Wreck	Whilst not germane to design principles this is a remote objection but there is an explosive wreck in the Thames, if anyone uses this as an argument against Manston, they should remember it's much closer to Southend airport.	

Evening Session 7 pm - 9 pm



Agenda	Summary	Speaker
Airfreight/ Passenger travel	Whilst not germane to design principles the Cllr questioned Osprey's mention of passenger travel. Solution responded by stating if there's a demand later on then passenger travel may be an option. At the moment it's being developed purely as an air freight hub. Similarly, with executive travel, it will be driven by the market and the airlines themselves in consideration of such items as fuel prices and infrastructure links. He reminded the group that the current Development Consent Order (DCO) is based purely on an operational air freight hub.	
Amount of flights	How many flights will be running daily. stated that to start, around only one flight per day will be running, building up to four to eight movements per hour much further down the project timeline. The Cllr then asked if this is mirrored at Southend airport. responds by stating Southend's a bit different as they have a short runway, so there's no freight there. People questioned why EasyJet went there, and the answer is because if you run an EasyJet or Ryanair, you need to get your planes in the air by 7 am. There are no more slots at the main London airports at those times, so they went to Southend to get the planes in the air. Assuming Ryanair sort out the problems with the 737 max, they will have additional aircraft in the next few years. We are pretty confident we will get two, three or four. I think they will fly to Southern Europe mostly, plus places like Edinburgh, Dublin and Stockholm. They quite like these short sectors to Scandinavian countries because you can turn the flight around quickly.	
Movements cap	Is 25,000 movements the cap? responds by saying there's a total cap of 25,000 which divides to 18,000 cargo movements and about 7,000 passenger movements. If we ever wanted to go beyond that, we would have to go back to the Secretary of State and have another DCO. As a comparator, Heathrow is 400-500,000. We're keen to have a passenger service if we can, but don't want another Heathrow.	Unconfirmed
General Aviation	The Cllr stated that historically there were some small planes included, such as two-seaters and asks if this is still a likelihood. The promised TG Aviation that they can return, and we'd like them to come back. He goes onto say most international airports don't like General Aviation	

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	 (GA) Sports & Recreation (S&R) because they get in the way. But we'll only have six or eight movements an hour, which gives you plenty of scope for GA(S&R). If you've got 40 movements an hour you just can't fit in GA. An unconfirmed speaker asked if this would eat into the cap, to which movements as the cap is only for commercial aircraft. 	
ATZ vs controlled airspace	Asks Osprey to explain the difference between Aerodrome Traffic Zones (ATZ) and Controlled Airspace (CAS). stated that the ATZ is an area where the air traffic service provider has a measure of control over the aircraft that enter that zone. Also, an obligation of the aircraft operator is that before they enter that zone, they must call the air traffic services. CAS is different, in that there are more full, rigid regulations on how aircraft operate in, and how they are allowed into that airspace. This is in terms of the equipment they carry, the types of radio and the interactions they have with the airspace. So it can have a restriction on how some operators use the airspace. Some operators, especially the GA(S&R), see it as a brick wall.	
Runways	The Cllr Rowley asked if there are one or two runways. Richie Hinchcliffe confirmed that Manston has one runway strip that has two ends; thus two directions of use, the westerly runway is known as 28, and runway 10 is the easterly runway.	
Westerly departures/ landings	The Cllr asked about take-off and landing. confirmed that they would see 76-78% of movements leaving to and arring from the wester; but that's weather and traffic density dependent at the time. This will be operationally managed by air traffic control at the time.	
Westerly departures/ landings	The Cllr asked if in low winds, the landing would be from the west and the take-off would be to the west? confirms this and states that in low wind, gentle breeze conditions the airport would prioritise arrival from, and departure to, the west.	
	The Cllr asked if this is able to be done due to the number of movements, which confirmed and	

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	stated that the amount of airport movements would provide time and space to manage this process.	
Wind speed	The Cllr asked what is considered a low wind speed which confirmed as a 10 Knots component along the runway (which is roughly 12mph).	
TMA	The Cllr asked what the TMA is? Second stated that it stands for Terminal Manoeuvring Area. The London Terminal Manoeuvring Area will be reconfigured to the demands of the UK's Airspace Modernisation Strategy. At the moment it is a capacity constraint for London's airports and is inefficient, and the technology we have available is not fully utilised. We will take advantage from these changes that the previous airport couldn't because in the vpast it didn't have the technology available.	
Worst/best-case scenarios	The Cllr asked what the difference is between a worst and best-case scenario. Second States stated that it depends on the options we have available. We may have options on how you distribute the aircraft once they're off the runway, and when they are landing.	
Herne Bay	The Cllr pointed out that Herne Bay is an issue and asks if you can avoid overflying Herne Bay	
Runway	The Cllr questioned as to why planes can't turn-in nearer the end of the runway. Sector 10 stated we might be able to when we get down further into detailed design. We have got nothing down on paper about these procedures at the moment. This was a worst-case assessment that had to be done for the DCO process, and we there might be option changes when in the final designs.	
Reporting Points	The Cllr questioned what meant when he previously mentioned points. Example a constraint of that a point, or 'reporting point', is like a road junction in the airspace. There are motorways, side roads and streets in the sky, and we call the junctions 'reporting points'. It's a map of interlinking navigation points, and it's how the air traffic manager and flight management system route or fly the plane. In terms of systemisation, those points are flexing as we modernise the airspace. When we start to	

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	design the procedures for the airport, we'll have to meld into these three-dimensional points in space. They may define how we take departures from, and arrivals into, the airport – it's not simply the airport's own demand.	
Herne Bay	went back to a previous point about Herne Bay, stating the aircraft have to be lined up. They need a long run in, as 3 to 4 miles is just too short for the pilot of a large commercial aircraft to get it configured for landing. The way you offset that is to set them higher, and Herne Bay is about 8 miles from the end of the airport's runway – which is about the standard approach length. That impacts where the planes will be, as the further out they are, the higher they can start. If they start west of Herne Bay, they could be at 4000 feet and have a gentle descent with low engine power in the descent to the runway due to the pull of gravity. These considerations will inform the options we take forward. The Cllr questioned this, and asked if Manston previously had this 8-mile lead-in. stated this is a normal length, it has a longer lead-in, as a worst-case for the DCO assessment. For departures, there's still constraints but a lot more flexibility. The landing could have more of an impact on Herne Bay,but the aircraft will be more stable in the descent, and therefore will have lower power settings.	
Turning	If you're taking off at an easterly direction, you can't turn before you get to Ramsgate? Confirmed that this is correct and stated that this is why taking off to and landing from, the west (in noise preferential runway direction) becomes more desirable as an operational consideration.	Unconfirmed
Aircraft use	asked what sort of vehicles might be in use. stated that in terms of freighters, we will be looking at 777 and 747 size aircraft. The Cllr provided reasoning for his question, stating that he used to live in Herne Bay when KLM operated from the airport, and he never noticed it, he also lived in Herne Bay when they were running the 747s and he did notice them.	

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	 states that there will be big freighters, but not the 747 200s. And reminded the group even if old airframes are used they would possibly have more modern engines which are quieter. The Cllr asked if this is an attempt to dispel the fear of the great black lines behind the planes. State state state state between the great black lines behind the planes. State state state state state state state are planes leaving behind fumes doesn't present a good image of environmental care. The Cllr went onto say that the last time we had 747s they trail of smoke. If that happens again, that would be a fairly considerable failure from everyone involved. The minded the group that Manston would be perating more modern aircraft, so I can only say that it is unlikely to happen. The CAA and manufacturers are looking into how engines operate and emmissions can be reduced. 	
Decision making	The Cllr asked about how the decisions of height, angle of approach and how turns are made responded by stating that you can provide us with ideas on design principles that would address some of the issues you're concerned about, and then design options will be considered. The Cllr then asked who makes the final decision on procedures; to which responded stating that the decision lies with the CAA.	
Turning after take off	The Cllr asked if there is a turn after take-off.	
Gateway questions	The Cllr questioned the term gateway. confirmed that this is project management term and is defined in the CAP1616 process and is a formal decision event made by the CAA in relarion to the Manston airspace change.	
Gateway questions	asked what the CAA will be looking at to get to the gateway. Confirmed the CAA (in this Stage of the process) will be looking at the design principles that have been pulled out of the stakeholder	

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	engagement, the questionnaire responses and how the design principles have been justified.	
	fail. To which the masked what would make the gateway responded if we haven't listed or reflected your thoughts in the design principles.	
Gateway questions	The Cllr asked if each gateway is effectively a CAA audit of the programme which confirmed confirmed.	
Gateway questions	The Cllr asked why the process takes so long. To which stated that the CAA suffers resource constraints similar to government department, this question might be directed at the CAA or DfT.	
Airspace Change Assessment	discussed the Level 1 airspace change assessment from the CAA and asked if the group agreed with this assessment.	
	states that he agreed with it because the impact is high, particularly on some of the take-off trajectories.	
Council attendees	The Cllr asked if the other councils attended the focus group meetings; to which confirmed there were 13 attendees in the afternoon sessions including councillors.	
FMS	The Cllr asked what the technical name for the autopilot to which answered that it is called the FMS (Flight Management System).	
Overflying Ramsgate	The Cllr stated that it's fairly obvious that Ramsgate would want as little overflying as it can and asks how he can express this. Stated that it comes down to safety. With a firm westerly wind (blowing from the west) and aircraft using runway 28, it's very difficult to mitigate that element, approach, of the aircraft flightpath. In a strong wind from the east you'd still have to have departure path to the east. That's an operational aspect that will be influenced by weather conditions at the time explained. In not providing procedures to, or from, the east it would mean that an aircraft coming in with those wind conditions would have to divert to another airport.	
	The Cllr stated that he accepts this but that aircraft wouldn't have to take off under those conditions to which responds that then you have aircraft grounded, missing their slots, with passengers sat on board waiting for the wind directions to change. The same with	

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	cargo. There's an economic and business model issue explained the point is you couldn't have that as a design principle, as there are so many related operational variables/requirements However, you can put that in as part of your consultation response.	
	The Cllr stated that his main point is that the ideal situation for Ramsgate would be no overflying at all and it looks like that could be achieved around 78% of the time depending on weather conditions, which leaves 22% of the time. What he 'is suggesting was that aircraft don't have to fly during that 22% when weather conditions aren't favourable and asks what is the best way to suggest this in our feedback?' responds by stating that in design principle terms, it would be "I don't want a procedure design that goes over Ramsgate".	
	responded by stating that this could mean you could have several 747s waiting for the wind to change to take off. And you can't run a commercial operation like that, and no one would fly to the airport. However, it could be suggested that the airport to have high levels of operating technology and process to ensure every aircraft that can safely land from the west and take off to the west does so. The problem in the past was that some captains opted to take-off and land from the east when they didn't have to. We are all for overriding and forbidding that.	
	then stated that the airport would obviously look to introduce procedures that minimise air traffic over Ramsgate. There may be design options to partially avoid it, but the designs and procedures for both ends of the runway have to be there.	
	"We will need compensating measures to the west, as if 78% of flights are going towards Herne Bay, we will need to make sure they can achieve greater heights and bank sooner."	Unconfirmed speaker
	The Cllr said the equal and opposite point to the previous speaker, who doesn't want flights going over Ramsgate, so all those flights will go west and south and come over our areas. He says that as much as he hears him, he doesn't agree with him.	

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	explained that design principles give us a measure to evaluate our designs. It is rare, given competing demands of routing and environmental impact that a potential design satisfies all principles. We may not be able to satisfy every principle but can try. A Cllr stated that there needs to be a middle ground.	Osprey
Flying over Ramsgate	A clif stated that there needs to be a initial ground. The Cllr asked if it is possible to stop pilots flying over Ramsgate when it's not necessary? explained that you can bring in airport sanctions, preferential runway systems and airlines will be cooperative because they thrive on reputation. So anyone not applying the correct procedures could have sanctions imposed.	
Turbulence	The Cllr asked if turbulence is not such a problem anymore to which the second second explain that it isn't.	
Height	The Cllr asked what height will the planes come in over Ramsgate to which replied it will be between 700 and 500 feet, depending on which part of Ramsgate. The Cllr asked about Herne Bay to which replied that it would be 3,000 to 4,000 feet and on departures more than that. The Cllr also asked about Woodnesborough to which replied that it will be between 7,000 to 10,000 feet. A Cllr asked if these heights can be 'nailed'; to which replied that it can't be specified at the moment as there's no procedure designed. That's why we go back to the principles. The heights are intuitive from experience, and can't be known precisely until procedure design commences after the engagement and through the CAP1616 process.	
	The Cllr asked if there will be a big impact on Ramsgate through noise and disturbance to which stated that they want aircraft to be up and away safely, and as soon as possible to minimise disturbance.	
Kent County Council	The Cllr asked if Kent County Council (KCC) have been involved to which said that KCC sent a representative to the afternoon session. The Cllr stated that Thanet, Canterbury and Dover should also be at all of these and that they can apply upward pressure in regard to this.	

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	explained that we can now define flight procedure flightpaths more accurately because of satellite navigation and the aircraft onboard equipment, you can have a route and say as a design principle do I want that route to be concentrated or be spread.	Osprey
Ramsgate	The Cllr pointed out that dispersion might be preferable as where houses are more separate so you might hear one flight a day but that you won't have much of a say if you live in Ramsgate, as you're so close to the runway.	
Lining out at Ramsgate	The Cllr stated that in Ramsgate, we'd like the aircraft to be lined up further out to sea than they were previously. It used to come along the beach and then turn into the airport. As a design principle, we want the planes lined up further out to sea.	
	The Cllr asked if there is a difference in the sound profile between urban and rural which explained that weather, land topography and the built environment does affect the way in which sound propagates.	
Landing at Minster end	The Cllr asked if everything is coming in from the west (the Minster end of the runway) what's the noise impact when hitting the ground. A seplained why a landing aeroplane is a lot quieter than one taking off due to engine power setting and operational processes (management) can be used safely by the airport to manage the effects of thrust-reverse (speed retard) on landing.	
Not using the whole runway	The Cllr asked what scope there is for not using the whole length of the runway (furthest away from Ramsgate) and explained that not landing close to the threshold on the runway introduces risk to the aircraft as the runway available to stop along is reduced introducing safety reasons why this can't be done consistently.	
Climbing quickly	The Cllr stated that he understands that it's possible for aircraft to climb quickly after take-off, in terms of proximity to Ramsgate can they climb quicker? explained that this is possible but there	
	are limits, and you have to take into account that this increases fuel burn which increases cost and is environmentally damaging. Steeper climbs also require greater power which produces greater engine noise. There is a balance between noise and fuel. There highlighted that this could be a design principle, that when	

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	possible aircraft should get away from Ramsgate as soon as possible.	
Principle	The Cllr 'seconded the motion' put by the previous speaker about turning out to sea as soon as possible and states that this is a good idea and should be a design principle.	
Wheels down	The Cllr asked usually where do wheels come down to which informed him that it is around the 5-nautical mile range.	
Previous experience	The Cllr stated that his previous experience of aircraft arriving from the east made it seem like wheels came down over the harbour to which responded that this is surprising and would be quite late to put down the landing gear, but it may have happened once or twice (military airraft) but is unlikely to have happened regularly.	
Ground Traffic	The Cllr stated that nothing has been mentioned in regard to ground traffic to which explained that this isn't a subject for discussion at this focus group as the group is considering airspace procedure design principles and ground traffic (and associated noise) was assessed previously in the current DCO application.	
Consultation evidence	The Cllr asked if all the evidence from the DCO consultation is available to which explained it is all available on the Planning Inspectorate (PINS) Website.	
Consultation process	The Cllr stated that examination and consultations were not communicated to his parish council to which explains that it was a very large, well- advertised consultation process.	
Other requirements	The Cllr asked what are other consultations or requirements to get permits for Manston, other than DCO and CAP1616 to which Constitution explained that the other one is the Aerodrome certification piece, about how the airport operates, its operational licenses, but that isn't a consultation.	
Questionnaires	The Cllr asked if all questionnaires go to CAA to which confirmed they are reviewed by the CAA.	
CAA	The Cllr asked if Manston presents a preferred route to the CAA. CAA stated a number of preferred options are presented, with rationales, the CAA then assess which is the best option to meet environmental and design principles.	

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North/South	The Cllr asked if the airport knows where these proposed flight paths are going head, do you have an idea what goes north or south or is it down to the other factors? explained that this would be dependent on the defined en-route reporting points.	
	pointed out that the only givens are the runway which exists and nothing can change this as well as the infrastructure in the sky. We've not come here with preconceived ideas in our head as this would go against the whole point of the consultation.	
Operation size	The Cllr asked if the airport operation be larger than before. The cllr asked if the airport operation be larger than as large as Heathrow, Gatwick or Stansted and there will be more seasonal flights and it will be modern. The aim is to transform it into a modern cargo hub with a maximum of 25,000 commercial movements per annum.	
New Infrastructure	The Cllr asked if the runway is the only thing that stays from the previous infrastructure or will everything be new. confirmed there will be new buildings, new parking etc and stated that this is all on the PINS website as part of the current DCO application.	
Q/A's	The Cllr asked what will be done with the answers given in the questionnaire to which responded that these will be recorded to define the design principles which then inform the procedure designs which are then available for full consultation with the wider community later next year in the consultation phase. This engagement element is fed back to CAA and will inform consultations, this is only to frame the initial ideas/principles.	
Airport cancellation	The Cllr asked if there is any scenario that leads to this simply not happening? The replies stating no, only if the aviation industry is curtailed but that's highly unlikely. There's a chronic capacity shortage in the area and this is why the airport is needed.	
	The Cllr then asked if the consultation is anything more than nuance and if he's wasting his time filling these questionnaires. He stated that he needs to understand the scope of consultation and if the DCO goes ahead then anything after that is just a nuance? Stated that it's not and there are definite things you can change using the principles. You can't	

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	change the operational aspects; this was the subject of the very long two-year DCO process.	
DCO decision	The Cllr asked if the DCO decision is simply yes or no decision or can it be nuanced? explained that this is pure speculation and that the PINS inspectors have written the report and it's on the Secretary of State's (SoS) desk. The advice he's had is that the SoS can make small changes, but can't make major changes without reopening the DCO process. He stated that he thinks the likeliest outcome is that the SoS will give consent. The Cllr then asked if the SoS can give consent but with 20% fewer movements for example to which replied "no", and explained any major changes like this would require further planning consultation. He confirmed that the SoS can ask further questions.	

END