

**From:** Deb Shotton [REDACTED]  
**Sent:** 27 January 2020 16:34  
**To:** Manston Airport <[ManstonAirport@planninginspectorate.gov.uk](mailto:ManstonAirport@planninginspectorate.gov.uk)>  
**Subject:** TR020002 : Revised deadline and invitation to resubmit, Manston DCO

Further to our recent email correspondence, please find below my submission, which replaces that sent by me in error on 23rd January 2020, and I thank you for your assistance in this matter.

Good afternoon

In response to the invitation from the Secretary of State in his letter published 17th January 2020 in relation to the above matter, I am pleased to make my submission to ExA following my recent email correspondence with Alison Giacomelli of Natural England.

Attached below this email is my email to her.

It is relevant to this invitation to interested parties to resubmit following the Five10Twelve submissions regarding flight contours and fleet mix, highlighting the inaccuracy of the data on which Natural England based their submissions to PINS.

During the application process, Mrs Giacomelli made efforts to hold the Applicant to their obligations as regards the requisite habitat surveys, for example.

I feel she was to a large extent unsupported by both the RSPB and Kent Wildlife Trust and she was also stretched in terms of resources due to other capital projects falling within her remit.

Her efforts were in the end undone by RSP's evasion and by the impossibly tight timescales for responses during the examination process itself.

Her response to my email, which I am not disclosing here, displays the disappointment felt by someone working in straightened circumstances who trusted an Applicant to tell the truth and took their assertions at face value only to find, now more than ever as RSP move into the Design Principles stage, that the Applicant is not to be trusted.

With a significant lack of insight, the Applicant has stated in their Overall Summary of Case :

"58. While acknowledging the contribution from local people, the Applicant then notes that there was a relatively low level of participation by statutory authorities, and this fact should be given some weight."

I think rather "some weight" should be given to how difficult the Applicant has made it for any statutory authorities wishing to participate, especially in the light of austerity-hit resources across the board.

I think it pertinent to stress at this juncture that, for those who sought to ensure that RSP played by the rules and took seriously their obligations towards those people and things adversely affected by their plans, our work was made unnecessarily difficult and stressful.

This is true not only for those of us in the Ramsgate community but also stakeholders such as Natural England and Historic England,

This is in the greatest part due to very tight timescales throughout the examination process, caused almost without exception by the Applicant's failure to front-load their application.

The application was allowed to proceed to examination without evidence of the work usually required during the pre-application stage of the DCO process.

The current Secretary of State's predecessor will know why this was permitted; I assume Mr Grayling had his reasons for allowing such inordinate and unreasonable stress and strain to be inflicted on a populace seeking to avert what we believe to be a regional disaster.

As a community opposed to the opening in our very midst of a noisy, dirty, polluting air-cargo hub, we have had to work tirelessly for many many hours to wade through reams of paperwork, to investigate and review statistics and research.

We have had to seek out and challenge falsehoods and evasion, to support stakeholders and encourage those who will be hardest hit by this blight to find their voice and to speak out against it.

Thanet as a whole, and Ramsgate in particular, has a poor demograph. We have felt the burden of responsibility for representing those among us who have fallen for RSP's assertions of local jobs.

We have had to seek to disprove RSP's promises that the airport will enrich the area and improve their lives, whilst the two Thanet MPs have supported the development with, seemingly, little care for the health and well-being of their constituents.

I submitted to ExA early on in the examination process a written statement from Sir Roger Gale, bemoaning the detrimental effects which the proposed new runway at Heathrow would have on the health of his young grandson in Chiswick.

Yet the constituents he was elected to serve in Thanet North, more firmly situated under the flightpath for Manston than Chiswick would ever be for Heathrow's new runway, are shown scant regard.

The promise of local jobs to a benighted area is a blunt weapon. Without research, it is not clear that "local" means within a 50 mile radius. It has not been made clear that many of the jobs promised are indeed far flung; the well-being of Kenyan flower farmers is not key to the regeneration of Thanet. It has not been made clear that a great many of the jobs will be

skilled, far beyond the reach of those seeking a way out of working poverty in their current unskilled jobs.

In my constituency of Thanet South, we are blessed here in Ramsgate with a burgeoning seaside town on which many are reliant for their jobs and prosperity.

Ramsgate is blooming. New shops are opening, restaurants have the confidence to invest and are winning plaudits as a result, the Festival of Sound grows every year, arts and music events see sustained growth. Local groups of volunteers are revitalising areas of neglected garden, planting street trees, litter-picking and cleaning the beaches.

The town's beautiful architecture and built heritage is being improved by investment from those who love the town. This is to the benefit of local tradespeople, their families and communities.

The beauty is bringing in increasing numbers of visitors to the town, as evidenced in research commissioned by Visit Kent and published by Kent County Council and [Thanet.gov.uk](http://Thanet.gov.uk). The tourism industry accounts for 19% of employment across Thanet.

We have our stunning coastline, miles of sandy beach linking attractive towns and host to the World Kite Surfing Championships. We have a thriving harbour, in which our MP Craig McKinlay keeps his sizeable yacht.

In addition, and to the delight of us all, we have wetlands and coastal areas, recognised and protected by European and national legislation as being important to the World. This is a precious jewel in England's coastal crown. We are very privileged to live in a time when such things are recognised as precious and deserving of such protection.

I believe the poverty of humanity evident in the Applicant's approach towards their obligations to the natural world should stand as testament for their approach towards us all.

RSP want to open an air-cargo hub on a site where commercial airports have never succeeded before, at a time when belly-hold is in the ascendent over dedicated air cargo.

They want to open this airport in the middle of a declared climate emergency, where the whole World either is or should be focusing on reducing carbon emissions.

They want to succeed in flying in perishables when we are being exhorted to "shop local" and work to reduce our personal carbon footprint.

Most importantly, they want to open an airport which will fly airplanes at low level, in skies which are currently full of the criss-crossing of higher level flights to and from the rest of the UK, Europe and the World.

They believe they can with impunity fly over and pollute, without challenge, areas of national and European importance for the support of wetland and coastal wildfowl, animals

and fauna, during a period where species worldwide are facing the biggest existential threat in human history.

Whether they want to do this to fulfil boyhood dreams of planes and airports, or whether it is to please off-shore entities with funds to launder, is unclear.

What is clear is that they have been sociopathic in their determination to succeed and morally deficient in their dealings with those who both oppose and support them.

They show no signs of changing, as their department in the current Air Space Design process is proof.

We are in the middle of a climate emergency.

Increasing numbers of people, of all ages but especially the young, are becoming aware of the potential for harm caused by pollution, both to their health through particulate pollution, and to the environment by CO<sub>2</sub>.

Just very recently the responsible council of Uttlesford has denied Stansted Airport permission to increase passenger numbers; they have recognised that this climate emergency means we all have to act now. We have to back up our promises to reduce carbon emissions and particulate pollution with concrete action, to mean what we say, not to turn the other cheek and hope someone else will solve the problem for us.

Increasingly, people are learning to protest. The young, especially, are active on social media and learning to co-ordinate to raise awareness where they feel their future is being threatened.

If this DCO is granted, Thanet will not lie down and accept the decision.

We will do everything in our power to continue to fight against this new airport. We will harness the arguments of climate emergency and the dire need for responsible action on climate change.

We will use the protest power of organisations such as Greenpeace, Friends of the Earth and Extinction Rebellion to help us.

We will enlist their practical knowledge to fight in the Courts to ensure that our well-being and that of our elderly, our children and our most under-privileged is safeguarded in the face of the wishes of a small handful of privileged men with their heads in the clouds and other people's money to burn.

I hope that the Secretary of State for Transport will realise that this DCO should be laid to rest with permission for the development denied in perpetuity and the land released for purposes more suitable to the needs of Thanet, Britain and the World.

His department's acknowledgement of the damage caused by particulate pollution to fragile communities with high levels of chronic sickness and poor health would ensure that towns like ours never again have to face the threat of low-flying polluting aircraft.

Furthermore, I hope his department will note with dismay the division and heartache caused to this community by this undeserving application.

His department's insistence on more rigorous pre-application policing of potential DCOs may serve to ensure that this will not happen again.

Yours sincerely, Deb Shotton

**From:** Deb Shotton [REDACTED]  
**Sent:** 22 January 2020 09:37  
**To:** Giacomelli, Alison <[Alison.Giacomelli@naturalengland.org.uk](mailto:Alison.Giacomelli@naturalengland.org.uk)>  
**Subject:** Revised deadline and invitation to resubmit, Manston DCO

Dear Alison, I hope this finds you well.

I am writing at the request of those concerned to continue in their opposition to the DCO application in the light of Grant Shapp's decision to delay his department's ruling on the Manston DCO and to invite further representation and comments from interested parties and, we note, from Natural England.

There is a great deal of information to absorb, I hope that this email serves to assist in this regard as I am sure that you are very busy and, like the rest of us, had assumed that this issue had been "put to bed".

Much of the information on which the Secretary of State has invited representations has been submitted by Five10Twelve. Their submissions are numerous and lengthy, forensic, detailed and probing. In drawing your attention to the most pertinent submissions, I trust I am of help.

I am attaching for your information and assistance a submission made by Five10Twelve to PINS during the examination process (TR020002-004683).

Some of the links in this document in regards to referenced evidence do not work and are referenced as REP-XXX because this submission was sent during the latter stage of the examination when submissions were being made and uploaded so quickly, and within such short timescales of reponse deadlines, that interested parties were being asked to comment on documents before they had even appeared in the Examination library. But the relevant quotes are largely within the document itself.

The bottom line here is that there is evidence to show, including from the Applicant themselves, that despite what they have told Natural England, RSP cannot guarantee the flight paths will be same as before . In fact their representatives argued the exact opposite when trying to rebut Five10Twelve's noise contour, this despite the fact that their own (RSP's) noise contour

had been drawn from the same parameters as Five10Twelve's, in line with CAA guildelines.

This has been just one of the areas where RSP have proven to be "selective" in their use of data, manipulating it without consistency to suit their needs regarding any particular set of questions or circumstances at any given time.

Further to the noise contour changes, there is also increasing evidence that the planes will be of the older, noisier variety.

This is clarified in Five10Twelve's evidence submitted post-examination, which was uploaded to the PINS Manston website (in regards to the Airspace Change focus group minutes and The Magma Airlines fleet of 25 year old planes), on which the Secretary of State for Transport has invited a response from RSP. I have attached a copy of this also for your assistance (TR020002-005184).

Those of us who are continuing to fight this DCO application to preserve this area, for all its residents be they human, fauna or flora, hope that Natural England will review its original submissions to ExA in the light of this later clarification of the Applicant's intentions.

The recent evidence falls into line with our appreciation throughout the examination process that RSP appear to focus on creating illusions that they are making efforts in

regards to safeguarding the environment, rather than ensuring that action is taken evidencing real effort.

We do not believe RSP hold the safeguarding of the environment in any way dear, but rather that they regard any relevant concerns raised as yet one more tiresome obstacle to be batted away using endless excuses, evasion and, where necessary (as outlined above in regards to the flight contours) deceit.

Moving on from the particulars of RSP's position as now evidenced, and particularly in the light of the decision from TDC that their outline proposals to enhance the protection of Pegwell Bay and Sandwich Bay through restricting pedestrian and sports access are no longer believed to be fit for purpose, the financial support of those proposals sought as mitigation by Natural England from RSP in relation to the development of this airport can in no way continue to be seen as even remotely valid.

In the light of this, I think we need clarity here about the inconsistency, historically, shown by Natural England, the RSPB and other bodies charged with the protection of these very special areas.

When the "Boris Island" Thames Estuary Airport proposals were first mooted, until finally put to rest by the SS Richard Montgomery, our SSSIs here in Thanet were deemed sufficiently important, from both a national and a European perspective, to contribute to Manston Airport being ruled out by the powers that be as a prospective alternative site.

Those of us who see that there can have been no diminution in their importance since, are at a loss to understand why they are deemed to be of such little significance now.

In fact, in the light of the increasing threats, ongoing and future, to wildlife and wild areas through increased pollution and climate change, these areas must now be seen to be more important than ever, making their protection, in turn, more vital.

We do understand that, with Heathrow, HS2 and other large capital projects requiring involvement from Natural England, resources are stretched and time is limited.

If this is the case, please let it be said; that Natural England are not in a position to carry out the safeguarding necessary for the wildlife with whose protection it is charged.

However we trust that the new evidence regarding the flight contours, fleet mix and lack of any proposed real mitigation by the Applicant to this DCO process will lead Natural England to work closely with the RSPB and Kent Wildlife Trust to hold RSP to account on behalf of the creatures and their environments which depend on you for their future well-being and, more starkly, their existence.

Please do not hesitate to let me know if there is anything we as a community can do to assist you in this.

With kind regards

Deb Shotton

cc: The Rt Hon Grant Shapps MP, Secretary of State for Transport

ExA, for the particular attention of Mr Broderick

Get [Outlook for Android](#)

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.