

Susan Kennedy



29th January 2020

Dear Mr Shapps, Ms Anderson and the Manston Airport Case Team

I write in response to your letter of the 17th January and the matters outlined which invited comment from interested parties.

1. No proven Need Case

I would wholeheartedly support **the late submission of Five10Twelve on 17th October 2019 headed Rebuttal to the Applicant's Overall Summary of Need Case** which reiterates and adds to the case rebutting any need for the airport proposed by the applicant.

No Night Flights, Five10Twelve and many others have produced convincing and evidenced arguments that dispute any proven business case or need for the proposal. The Government will be mindful of decades of work, hugely supported by aviation experts York Aviation (heavily critical of the Applicant and Application), that have pointed to various solutions to the aviation issues in the UK. None of which included Manston. Indeed, it is clear that successive governments' strategy, based on expert opinion, commissions and years of work, is to make best use of existing capacity at airports and to expand, where appropriate, those existing airports. This does not support any need for the creation of a new airport at Manston.

The applicant, due the deficiencies in the DCO process, has never been obliged to present a watertight business case or proof of need. As soundly evidenced in the Five10Twelve submission, 'the Applicant has **NOT** demonstrated that Manston is/will be cost-efficient, sustainable and deliverable ' and it would contradict Government strategy to support this application, not to mention the reputational damage of accepting a proposal that has no strong evidence base of need, deliverability, sustainability and financial backing.

2. Reputational Risk

In considering reputational risk, I would like to support the late submission of **Five10Twelve of 23rd December entitled Public Cost and Reputational Risk.**

This submission builds on and adds to work submitted by No Night Flights and others; detailed submissions to the Examining Panel over many months. Many of us have spent 5 long years pointing to the extremely poor credentials of the Applicant. An Applicant, it must be remembered, that was turned down twice by the local district

council as too risky and simply not credible as a partner for a much smaller proposed airport.

I will not reiterate the very sound points raised in the Five10Twelve submission, but I would summarise as follows with regard to reputational risk:

The Applicant:

- Has been rejected twice as a viable airport operator
- Has no experience or credibility in this field
- Has, throughout the process, delayed, obfuscated and repeatedly failed to produce monies and evidence as required.
- Has failed, repeatedly, to consult with residents in a fair, open and transparent way.
- Has failed to produce any evidence of need.
- Has failed to produce any credible evidence of investors or investment.
- Has projected unrealistic figures for numbers of ATMs
- Has produced noise contours that alternative noise contours, commissioned privately from the CAA by No Night Flights and Five10Twelve (2 separate commissions), prove to be unrealistic and that minimise that actual noise impact on residents, schools, care homes, amenities and outdoor spaces.
- Has little to no chance of securing the necessary aerodrome or airspace permits given that the CAA does not believe the Applicant to be an aerodrome operator. As indeed, is the case for any and all of us involved with this case. RSP is a start up company with no experience, no track record, no expertise. I would point to and support the late submission by **Five10Twelve on No Aerodrome No Airspace of 19th December 2019**.
- Has failed to produce accurate noise contours with the consequence that their Noise Mitigation Plan is woefully flawed, understating as it does the levels of noise, the reach of noise and the impact of noise.
- Has failed to guarantee no flights at night. Their NMP allows for flights through the night:
 - Unlimited 'late arrivals' between 2300 and 0600
 - Nightly ATMs only to be constrained by the overall annual ATM limit for the entire airport meaning, in effect, any number.
 - No cost to the Quota Count budget for ANY of these night flights and their unlimited amount of noise created during the night time.

In addition, as the first DCO with regard to an airport, any decision here will be under the spotlight. The process itself has been proved to be flawed, inappropriate and inadequate in relation to both the setting up of a brand-new airport and in relation to the type of Applicant this DCO process has been instigated by. There will be close scrutiny of this whole process and other airports,, residents' groups, political parties and other interested parties will be considering where precedent is being set and the

far wider implications in terms of environmental cost, public health cost, climate change cost and so on.

3. History, Heritage and Regeneration

The Secretary of State is right to call attention to **the late submission of Five10Twelve of 1st November 2019** with regard to Historic England and the recent addition to their Risk Register (in October 2019) of the Ramsgate Conservation Area and Clock House, Royal Harbour. These national gems are at real risk from this proposal, as has been pointed out over the years. Ramsgate's significant and continuing regeneration is dependent hugely on its important and unique heritage as well as a similarly unique and significant coastline. In the same submission, Five10Twelve draw attention to Thanet District Council's feasibility study for further development and enrichment of our town. Ongoing development and regeneration would come to a halt should this DCO be granted. Not only that, the economic growth and increasing prosperity of a coastal town many years in decline would go into reverse as few holiday and leisure participants and businesses would continue with planes a mere 300-600 feet above at very regular intervals. It would be useful to point out visually how directly our town is affected.

Figure 1:

This aerial shot shows from the end of the runway (less than a mile from the beginning of the town).



4. Inaccurate Environmental Statement

I would support the **late submission of Five10Twelve of 27th October** 2019 which points to the inadequacies and inaccuracies in the Applicant's Environmental Statement. Presenting a best-case scenario rather than a worst-case scenario is simply not acceptable and I would point again to precedent and the reputational risk of accepting an application that so clearly fails on so many criteria. Setting a precedent of this nature would damage the DCO process, would damage future DCOs and would seriously damage the Government and the Department's credibility in properly safeguarding our environment and the public.

5. Climate Change

It seems patently ridiculous that the Applicant estimates and requires 1.9% of the total UK aviation emissions of 37.5 Mt CO₂ budget for 2050. With climate change targets in place, and held by the majority of experts to be too little too late anyway, it would stretch all credibility for the Government to agree that any of this budget be allocated to a brand-new, unproven, highly dubious airport instead of concentrating it on those existing airports where Government strategy is to support in terms of sustainability, capacity and expansion.

The public are ever more concerned and ready to act with regard to climate change. MPs have recently commissioned focus groups to 'test' what the public appetite is for different measures or policies that would support climate change mitigation. In today's climate (excuse the pun), it is simply not acceptable to create new airports. Even those wanting expansion are facing serious opposition.

Southampton City Council are supportive of their own established regional airport but are increasingly concerned about expansion and on 27th January 2020 it was reported that they have said:

*"The proposed runway extension would facilitate a level of forecasted growth in air transport movements that would be **at odds** (my bold) with the independent advice to government from the Committee on Climate Change on building a low-carbon economy and preparing for climate change.*

"Furthermore, the forecasted amount and frequency of aircraft departing to the south and arriving from the south over Southampton, would have a predicted significant adverse noise effect.

"The proposed mitigation measures/controls relating to forecasted carbon emissions and noise impact are not alone sufficient in order to address these concerns."

As is obvious from the comments here on a different airport, the creation of a new airport 'would be at odds with the independent advice to government from the Committee on Climate Change'. Independent scientific opinion is clear. The increasingly articulated views of elected representatives who recognise their duty to current and future populations are clear. The public is increasingly focused on climate change and the potential threat to our planet, our country and our local environment is felt keenly here in Thanet.

The Government is urgently looking at solutions to the climate change crisis and aviation proves one of the most taxing areas in this regard. Manston offers no solution; indeed, it exacerbates the problem. The Government has a legally binding commitment to make the UK carbon neutral by 2050. It is imperative that the Government send a clear and consistent message to all sectors, including aviation, that there must be serious steps to cut emissions. Building new airport capacity is inconsistent with that message and that commitment. Signalling the go-ahead for Manston would do the Government serious reputational damage both nationally and internationally.

Conclusion

The late submissions by Five10Twelve plus the questions raised by the Department must be given serious consideration and it is impossible to see how the Applicant can credibly respond. The cost in terms of public health, the environment, climate change, regeneration and heritage would be incalculable and accepting this application would both set dangerous precedent and cause significant reputational risk to the Department for Transport and to the Government. With no proven case of need, no track record, no transparent financial credibility, no expertise, a riskier Applicant it would be hard to find and I would urge the Secretary of State to reject this Application.

Kind regards
Susan Kennedy