

The Rt Hon Grant Shapps
The Secretary of State for Transport
Department for Transport Zone 1/18
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29th January 2020

Dear Sir

Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010

Application by RiverOak Strategic Partners Limited (“the Applicant”) for an Order granting Development Consent for the reopening and development of Manston Airport in Kent.

REQUEST FOR COMMENTS AND FURTHER INFORMATION

Further to the extension by you to the DCO application from RSP for Manston airport and the request for further information. We wish to add our wholehearted support to submissions by Five10Twelve & No Night Flights. They have flagged up many valid issues raised during the DCO process that we feel were not adequately addressed, mostly due to the abrupt way the examination period ended with so many loose ends left unanswered.

We support Five10Twelve’s submission of 27th October 2019 which points to the inadequacies and inaccuracies in the Applicant’s Environmental Statement due to them presenting a best-case scenario rather than a worst-case scenario. This simply is not acceptable given the number of people that will be affected. This would create a precedent for future DCO applications in which applicants would attempt to get away with underplaying the possible negative environmental impact of their projects. Given the current very real concerns regarding pollution, climate change and impact on people’s health we are sure this would lead to a lack of confidence in the secretary of state’s ability to consider the bigger picture when making a decision.

Living under the flight path should Manston reopen we are very worried about the very real prospect of planes overflying our home 24 hours a day at a height of 3-400ft. Riveroak Strategic Partners' (RSP) noise mitigation plan is anything but. Their proposal for a "quiet period" between 11PM & 6AM, which isn't even 8 hours anyway, will leave us open to the nightmare of continual night flights. We will not receive any compensation or help towards sound proofing our home even though we will be subjected to noise in excess of 90db on regular basis day & night. Not that sound insulating our house will be of any benefit when we wish to take advantage of our garden, parks, beach & other local outdoor amenities for leisure pursuits

Under their proposals there could be unlimited "late arrival" Air Traffic Movements (ATMs) that would be allowed between 2300 and 0600. Nightly ATM limit is constrained only by the overall annual ATM limit for the entire airport. There will be no cost to the Quota Count budget (the noise budget) for any of these late night flights and the unlimited amount of noise that could be created during these 7 hours. RSP have not legally qualified what constitutes a "late" flight so basically that could mean anything down to a late booking of a flight by a client. There is no mention of who will police this and what action would be taken should RSP breach this very vague condition. We have no doubt whatsoever RSP will abuse this loophole as cargo carriers need flights at night. Mr Freudmann is well aware of this fact as he tried to introduce night flights at Manston when he was in control there and the fact "late" arrivals he allowed caused many complaints from residents. In fact "late arrivals added up to a large percentage of overall ATMs there

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Then we will have an unlimited number of ATMs, departures and arrivals, between 0600 and 0700, subject only to a QC budget of 2000 QC points for that single hour. ATMs rated up to and including QC2 will be permitted. For illustration, a 747-400 is rated QC2 on arrival. We could also have many ATMs rated QC0 and QC0.125 as RSP could handle as they are not subject to any ATM cap nor included in the QC budget.

Disturbed sleep on this scale would have a massive impact on the health & wellbeing of the 40,000 plus residents of Ramsgate, not to mention the effect on children's development and the impact on their education. This is without the effects of pollution such a development would create. Pollutants such as nitrogen dioxide (NO₂) & particulates of the size PM_{2.5} which is breathable and breaches the lung/blood barrier & blood/brain barrier causing heart problems, circulatory problems and strokes. The EU sets legally binding limits for air quality and limits for air pollutants that affect public health such as particulate matter PM_{2.5} and NO₂. We would hope the Government will adopt these limits post Brexit. With a government target to be carbon zero by 2050 it seems impossible to us that a new cargo hub at Manston would be compatible with that target as aircraft, airports and associated activities are massive producers of greenhouse gases.

For a DCO to be successful the project has to be of national significant importance and the applicant has to provide evidence to support this claim. We have followed the DCO process from the word go and as far as we can see they have fallen very short of the threshold required. During the DCO process the applicants have mislead, misrepresented and at times downright lied. They were also very aggressive to anyone who asked awkward questions at the one consultation in Ramsgate. They repeatedly failed to produce evidence of investors,

funds & monies spent as required by the examiners. As a company they have no history of running any successful airport or aviation business at all. The only person who has any background in aviation is Mr Freudmann, a [REDACTED] solicitor whose continual business failures are a matter of record. They have produced no real evidence of need. In spite of being asked many times they have been unable to produce any real evidence of funding or where it would come from, something which lead to TDC refusing to compulsory purchase the site twice on behalf of RSP's previous incarnations. Any investors are shrouded in secrecy in an offshore company. Nobody has any idea where the money came from to purchase the site from Stone Hill Park. The company that now owns the ex-airport site is different from the company that has applied for the DCO. It is worrying that the examiners & the planning inspectorate were unwilling or unable to do due diligence to ensure any monies used were not funds being laundered. They have not produced a recognisable business plan or costings to show such an enterprise would be economically viable or sustainable. It seems they even found difficulty in paying the examiners bill, paying it late in the end. The only person who has supplied any "evidence" in support of RSP's proposal was Dr Sally Dixon who is employed by them. Her evidence consisted of anecdotal stories of lack of UK runway capacity which has been evidenced as incorrect. Her figures of tonnage transported per ATM bore no resemblance to the real world. As RSP have not signed up any carriers or had any concrete interest her figures amount to little more than guesstimates. It seemed to us she started with the amount of ATMs needed to justify a DCO then worked backwards.

Manston shut nearly 6 years ago and nobody really noticed. There was no crisis in aviation due to loss of capacity and as the 150 jobs lost were nearly all zero hours contracts it barely caused a ripple in the employment figures. In fact since the airport shut employment has increased locally especially in tourism and unemployment has dropped. The tourism industry accounts for 19% of employment across Thanet and is sustainable. If there had not already been a runway there nobody in their right mind would even consider opening an air cargo hub with all the safety & health implications involved so close to town such as Ramsgate. Because of facts we have listed here and evidence submitted to the enquiry there is no doubt in our minds that should you accept this application it will severely damage yours and the government's reputation at a time we, as a country, are under the spotlight. Given the overwhelming evidence against such a project it would also irreparably damage public confidence in the DCO process for other major infrastructure projects that really are in the national interest. We would therefore urge you to support submissions from Five10Twelve, No Night Flights and many other people opposed to Manston being opened as a 24/7/365 cargo hub and reject this very unsound application.

Yours sincerely. Ian & Hilary Scott

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