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Dear Sir,

We live on the Nethercourt Estate in Ramsgate, directly under the flight path of the former Manston Airport and are extremely worried over the prospect of it re-opening due to the pollution & noise we experienced during its very limited operations in the past. When the airport finally shut after failing three times and losing millions pounds for its owners & local tax payers nobody really noticed. In fact the only outcome to us was positive as since its closure we have noticed an improvement in our health & sleep. The re-generation in Ramsgate since the airport shut has brought in many visitors to our historic town with much needed investment & jobs. We, our children and grandchildren are, once again, able to enjoy the outside life without the fumes, pollution and noise which made our lives a misery whilst the airport was open. Our grandchildren are able to go to school and hear what is being taught without having lessons interrupted by aeroplane noise. Their prospects in future life improved the day it closed. Now once again they may have to endure all the noise & pollution from the airport marring their lives and futures.

Response to the DCO:

1. No proven Need Case

I 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 arguments that dispute any proven business case or need for the proposal. The Government should take into account the years of work, greatly supported by aviation experts York Aviation (heavily critical of the Applicant and Application), that have pointed to solutions to the aviation issues in the UK, none of which included Manston. It is clear that successive governments' strategy 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 cargo hub at Manston. The only evidence Riveroak Strategic Partners (RSP) have provided of need is Azimuth Aviation's report. Their only employee seems to be [REDACTED] who has no expertise in the field. Her report consists entirely of anecdotal evidence of lack of capacity in the UK which has been evidenced by groups such as No Night Flights (NNF) as untrue. Her forecasts of air traffic movements (ATMS) predicted for Manston are entirely conjectured. Indeed her forecasts seem to infer that RSP will capture over 100% of a market that has shrunk by 50% in recent years, clearly ridiculous. Her freight loadings per ATM bear no resemblance to previous experience, loadings being typically 30-40% lower. Again this has been evidenced by NNF.

It has been widely accepted by aviation experts over many years that Manston will never succeed because, amongst other reasons, it is in the wrong location the catchment area surrounding it being mostly sea & poor transportation links.

As soundly evidenced in the Five10Twelve & previous submissions the Applicant has **NOT** demonstrated that Manston will be economically viable, cost-efficient, sustainable or deliverable' and it would contradict Government transport strategy to support this application. It seems RSP cannot produce any real business or costing.

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.**

Many of us have spent over 5 long years pointing to the extremely poor credentials of the Applicant a [REDACTED] solicitor with a long history of business failures .Mr Freudmann makes out he was just a "foot soldier" at Manston when the truth is he was at the helm during one of its three failures

The Applicant RSP:

Has been rejected twice as a viable airport operator by TDC due to lack of transparency of funding

Has no experience or credibility in this field

Has, throughout the process, delayed 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.

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.

RSP is a start-up company & by their own admission have no experience, no track record & no expertise in operating any sort of aviation business whatsoever therefore I would point to and support the late submission by **Five10Twelve on No Aerodrome No Airspace of 19th December 2019.**

3. Noise Mitigation Plan & Environmental Impact Assessment

They have failed to produce accurate noise contours with the consequence that their Noise Mitigation Plan (NMP) is woefully flawed, understating as it does the levels of noise, the reach of noise and the impact of noise. The NMP was based on noise contours RSP had commissioned by Oliver Bewes. Apart from the fact it was not updated when RSP changed

the fleet mix they predicted they were drawn up by someone with no experience of creating aircraft noise contours, his expertise seems to be railway noise, on software that was many years out of date. In contrast Five10Twelve & NNF went to experts in the field the CAA. The noise contours produced by them using real life db readings show the noise pollution is far greater and covers a much wider area. RSP's noise contours show noise would be a much smaller problem than it was the very small operation that took place at Manston before. With a project many times greater that took place before how can that be so. It is obviously ridiculous.

All through the consultation & examination process they have tried to disguise and mislead regarding night flights. This is obviously something they need as they have continually tried to sneak them in. In spite of their protestations they have failed to guarantee no flights at night. Their NMP allows for flights through the night: Unlimited 'late arrivals' between 2300 and 0600. Nightly ATMs will only to be constrained by the overall annual ATM limit for the entire airport meaning, in effect, any number.

As RSP did not update their Environmental Impact Assessment (EIA) either when they changed the fleet mix this also cannot be relied on to convey the true impact of their proposal and therefore is not fit for purpose.

It has to be pointed out that both NMP & EIA were produced by RSP with best case scenarios when what should have been produced was worse case so the very possible position could be properly assessed

4. History, Heritage and Regeneration

Historically when Manston originally opened the type of craft used at Manston were Tiger Moths or today's single-engine training aircraft and gliders. It was a grass runway right up to the 1940s and the existing runway is in an entirely different location. I doubt it was ever envisaged we would get 747s etc flying from the airport a mere 300-600 feet above Ramsgate a town of 40,000 plus residents. Ramsgate has a very large conservation area & a high number of listed buildings all of whom will be susceptible to vibration damage due to the nature of their construction. Ramsgate has now been declared a heritage action zone by Historic England in recognition of its unique status. RSP are paying no attention to environmental factors and heritage and have no kind of good neighbour policy. If there had not been a runway there nobody in their right mind would consider Manston as a good location for any sort of aviation project because of its proximity to such a large town.

5. Climate Change

It seems 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 more concerned and ready to act with regard to climate change.

In today's climate it is simply not acceptable to create new airports. Even those wanting expansion are facing serious opposition.

Southampton City Council is supportive of their own established regional airport but is 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** 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."

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 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. Passing this DCO would be incompatible with Government targets to cut carbon emissions.

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. It would also be at odds with Thanet Councils unanimous decision to declare a climate emergency.

Conclusion

The late submissions by Five10Twelve plus the questions raised by the Department of Transport 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, yourself as Secretary of State 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.

Regards,

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