

**From:** [REDACTED]  
**To:** [Manston Airport](#)  
**Subject:** For the attention of the Manston Airport Case Team  
**Date:** 28 June 2021 12:53:00  
**Attachments:** [NAG Final 2021.docx](#)

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Dear sir/madam further to the quashing of the Manston DCO and the Secretary of State's request for submissions from interested parties who wish to comment on the redetermination please find attached our submission from Nethercourt action group (NAG) REG; 20013745

Ian Scott & Cllr David Green on behalf of NAG

## NETHERCOURT ACTION GROUP

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We are a group of over 250 residents living in Nethercourt Ramsgate. Our community is in a unique position as our homes begin less than one mile from the airport site. No other airport has a housing estate so close and we will be amongst the worst affected by the noise and pollution such an operation will cause. Not that anyone in Ramsgate, a town of over 40,000 will fare any better. Many of us are fully aware of the misery the previous very limited flights from Manston caused to residents here. We are extremely disappointed & feel very aggrieved that Andrew Stephenson as the Secretary of State's representative for the DfT went against the DCO examiners recommendations & passed the DCO. We took part in the examination process in good faith with written submissions & members of our group making oral statements. In the circumstances we thought we would get a fair hearing. It seems we were wrong. We felt the planning inspectorate & DCO examiners were very balanced and took on board our evidence. They used all the information we and many other interested parties submitted and came up with the only possible result which was recommending refusal of the DCO on many issues. We have to wonder why the SoS & DfT put everybody through the time & expense of an examination process just to totally ignore the result. It will certainly greatly reduce the public's confidence in the DCO process if it isn't seen to be balanced & fair.

We have read Stephenson's decision letter. He comes up with no real valid reason to override the examiners recommendations apart from he can. There were many reasons the examiners recommended refusal & the decision letter appeared to deal with none. This resulted in a judicial review where the Secretary of State conceded as he did not "give adequate reasons in his decision letter to enable the reader to understand why he disagreed with the Examining Authority Report on the issue of need for the development of Manston Airport". We note the other issues of need & government CO2 targets were not tested in court so are still outstanding.

The general feeling is that the DCO would never have reached this stage without Roger Gale's continual behind the scenes lobbying for RSP, a company whose investors are shrouded in secrecy in the British Virgin Isles. Given the recent Greensill Capital lobbying scandal we feel Roger Gale's actions in this saga are, and have been, unacceptable as RSP are a private company. Roger Gale gives the impression there is 100% support for reopening Manston airport. There isn't and the unfortunate truth is Roger Gale will not engage in any way shape or form with anybody who is critical or concerned by RPS's plans and has called anyone who voices any opposition "subversive incomers". He seems to feel anybody moving into the area should not have any input as to what happens at Manston unless they support RSP's plans. In fact he

takes RSP's position over those of his constituents. We also feel that Craig MacKinlay's previous business relationship with Tony Freudmann at Manston is colouring his position regarding Manston to the detriment of Ramsgate residents as, again, he point blank refuses to engage with any of his constituents who have concerns regarding reopening Manston as a cargo hub. He has an aviation company MaMa Airlines that is still active according to company's house. He has had to apologise to the House for failing to declare an interest after taking part in debates after he "forgot" he had it. He has a long standing relationship with Mr Freudmann and was intending on using Manston for his airline when Mr Freudmann was in charge there. Because of our two MP's commitment to Manston reopening we suspect the DfT will have the totally wrong impression regarding the amount of support for RSP's plans. Both Thanet MP's refused to engage with Stone Hill Park who had plans for a mixed use development at Manston.

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In the recent G7 meeting countries have made long-term targets to reach net zero emissions by 2050, and nearly all have targets to cut carbon in the next decade. The UK has led with a goal of cutting emissions by 68% by 2030 and 78% by 2035, based on 1990 levels. The Sixth Carbon Budget will be enshrined in UK legislation and targets for carbon emissions from UK international aviation will be included from 2033 onwards. RSP are claiming Manston will be carbon neutral but **this does not include aircraft using it or the vast number of lorries and aviation fuel tankers needed to service such a hub.** Non-polluting planes of the type needed to move cargo are decades away. We are hosting the COP26 climate conference later this year & we have to wonder how, as a country, we can convince other countries to reduce pollution when we are even considering a project like this that isn't needed. Government climate advisors are warning we are already suffering effects of climate change and the long term effects on the UK have been grossly underestimated. On 17<sup>th</sup> June the Climate Change Committee published two progress reports, showing the UK lagging behind on its key goal of 78% cuts to greenhouse gases by 2035 and making recommendations on how to get back on track. Lord Deben, the committee chairman, said: "The targets are remarkable and have set a major example to the world. But the policy is just not there.

It's very clear we need to step up very rapidly". To open a new cargo hub at time like this would seem madness when the government has committed to such targets they are already struggling to meet. In recognition of the fact such targets will be difficult to meet Thanet District Council have declared a climate emergency.

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With regard to need we don't think we need to explain to the DfT the impact the covid pandemic has had on the aviation industry with all the big players in dire financial trouble and only surviving with government help. It seems aviation will take many years to recover & it seems doubtful things like business travel will ever return to pre-covid levels with companies realising that virtual meetings are a better use of time & money.

The pandemic has shown RSP's theories that constrained airport capacity was limiting the growth of the air cargo market to be false. Due to cancellation of passenger flights there has been no shortage of airport capacity at all with airports desperate for revenue. Yet even with the reported increase in demand for e-commerce and spikes in demand during the PPE shortage in the early stages of the pandemic, there has been a significant drop of **21%** in tonnes of goods moved by air freight, from 2,525,422 tonnes in 2019 to 2,002,187 tonnes in 2020. (Source: CAA Freight 2010-2020) While at the same time goods moved by truck has carried on even with the difficulties caused by the pandemic, ironically shown by the need to use Manston has a holding pen while the French boarder was shut.

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smaller than quoted during the DCO examination but he is careful to keep that figure high enough to warrant a DCO. There is also expansion at other airports. The examiners concluded that there was enough spare capacity already at other airports that negated the need for Manston.

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So that leaves extra capacity for 5,500 more cargo ATMs. Even with the extra demand due to no bellyhold cargo ATMs only rose by 198 in 2020. Again disproving RSP's claim airport capacity was limiting air freight. RSP were quoting 17,100 cargo ATMs, though recently Mr Freudmann is on record as reducing that to 12,000 so that leaves 5,500 spare slots and takes out a big chunk. While there may be a temporary increase in cargo flights at the moment due to lack of passenger flights and the availability of bellyhold once passenger flights get going again this demand will drop as bellyhold freight on passenger flights is much more cost effective than cargo alone.

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East Midlands has an expansion plan too. It is getting bigger, so even more planes can park at the same time. The airport is improving its infrastructure so that aircraft can load and unload more efficiently at busy times. Work started in 2019 to build more aircraft parking space at East Midlands Airport & warehousing to accommodate the cargo so growth is underway. Aircraft that serve the Fed Ex/TNT, UPS, Amazon and Royal Mail

operations use the east apron, a large concrete area at the M1 end of the airfield. This is being widened to allow up to four more aircraft stands so four aircraft can be parked at any one time. Also at the east side of the airport, UPS's new facility is taking shape. The £114m development will double the size of its operation at EMA making it the company's largest air logistics facility outside the US.

As part of the Budget 2021 the Chancellor Rishi Sunak has confirmed that East Midlands Airport has been granted Freeport status. Because of this there are manufacturing & warehousing companies investing nearby.

An agreement not to use the second runway at Gatwick is also coming to an end. The runway is currently used as a taxiway and for emergencies. Under plans in place it could be operating short-haul flights by the end of the decade. Details of the expansion were first proposed in 2018's "Master Plan" for the airport, which said that an extra runway would add 55,000 flights a year. Gatwick Airport has lost BA. Although Gatwick doesn't focus on freight it will now have to diversify to stay open. They already have all the infrastructure needed in place, are up and running with direct access to a road network. It has to be pointed out that in April 2021 Gatwick told investors that expansion of London's airport capacity was not required until at least 2030 due to the impact of covid travel restrictions on passenger demand.

All of these airports have much better transport links to the rest of the UK than Manston. The use of Manston during the covid crisis showed the road connections were inadequate with both the A299 & M2 being just two lanes. These being the only major roads out of Manston with no intersection with any other motorway until the M25 at Dartford or the A249 to join the M20. Dartford is regularly snarled up around the M2/M25 junction with hold ups lasting hours, especially when the bridge has to shut due to high winds. This is something that is happening more & more with changing weather patterns, ironically probably down to global warming. If you draw a circle round the catchment areas of other airports and then draw that around Manston 75% is sea. Competitor airports like Gatwick East Midland, Stansted, Southend & Heathrow will struggle post covid. They are going to fight like hell for market share and undercut Manston. They are all up and running with a proven track record. RSP are already in a position where they would have to charge high landing fees etc just to service construction costs.

There was never any need for Manston to reopen as the examiners have concluded. At the oral hearings RSP's own expert Sally Dixon could not say whether the project was economically viable. She said it was something she had never been asked. It seemed to us her entire evidence boiled down to anecdotes one of which was a lot of freight is trucked into the UK as cargo aircraft could not find slots at UK airports. Apart from the fact the examiners found that to be untrue it is worth pointing out that trade has dropped with Europe by 40% since Brexit. There are no manufacturing or distribution hubs anywhere near Manston. Anything landed at Manston would need to be forwarded by truck or a further flight. That really defeats the object when aircraft could fly on to better

located airports in minutes. Mr Freudmann's latest idea of using electric barges from Ramsgate port is a joke. Who in their right mind will land at Manston, unload, load onto lorries, drive to the port, unload, load on to barges, sail up to London ports, unload & then load onto lorries for their final destination. Of course the major hurdle in this is where are these barges miraculously going to appear from? They keep claiming companies like Ryanair & KLM will use Manston. The truth is RSP have no commitment from any airline whatsoever to use Manston. It seems RSP's plans get more ludicrous as it goes on. It has the makings of another Seabourne debacle.

It is also worth noting that the CAA has refused to pass the latest stage of RSP's application for flight paths & aerodrome licence. As this is at a very basic stage they should have passed this stage easily. Given all the safety concerns an airport involves we don't think it bodes well for the future.

There is always the question of financing. Who in their right mind would ever invest at Manston it has failed three times, losing investors, Kent County Council & Thanet District Council thousands of pounds. Mr Freudmann is very shy about exactly who is supposedly investing. To be honest we are doubtful they even exist. Mr Freudmann himself is on record as saying RSP would not be taking the project forward financially but would be looking for further investors. We are also concerned there does not seem to be any due diligence regarding funding of RSP, a company based in the British Virgin Isles and the absence of any credible business plan put forward. It seems all RSP funds are funnelled through Freudmann Tipple a company owned by Anthony Freudmann & Eleanor Freudmann. It also seems Mr Freudmann has never ever run a successful business and has been struck off as a solicitor for misappropriating clients funds. Any investor doing the most basic checks would find this out. Mr Freudmann says Manston failed due to poor management but fails to point out he was at the helm during one such failure when loads of small investors lost their money

**Clause 8.2.177 Direct jobs at the airport would be 19% lower than forecast.**

**Clause 8.2.180 The ExA has significant doubts over the calculation of direct, indirect/induced, and catalytic job numbers.**

**Clause 8.2.184 The Proposed Development would adversely affect the tourism industry in Ramsgate.**

The big argument for Manston has been employment. We have always argued that RSP's direct & indirect figures were fantasy. They have never been able to quantify or qualify what jobs would be available relying on obscure "multipliers" to arrive at some

notional figure which bear no resemblance to real life. This is another claim Mr Freudmann is back peddling on saying automation would reduce the number of jobs created. As it was always planned by RSP to be a state of the art cargo hub we have to wonder why he has only just come to that conclusion. It has been pointed out that any jobs created at Manston will be at the detriment of those at another airport.

According to research in 2017 visits to Thanet increased by 8.6% with the district welcoming a record 4.2 million visitors,. The value of Thanet's visitor economy grew by 9.2% in 2017 and is now worth over £319 million. Independent research commissioned by Visit Kent showed that the number of day trips to the Thanet district leapt by 9.9% in 2017, meanwhile the total number of nights stayed in the district increased by 4.9%. The total number of jobs supported by tourism rose by 8.7% to 7,950, with the industry accounting for an impressive 19% of total employment across Thanet.

Kent's latest Tourism Economic Impact Study shows that, before the devastating impact of the COVID-19 pandemic, Thanet's visitor economy was valued at £352 million, after welcoming 4.6 million visitors in 2019. Independent research commissioned by Kent's official Destination Management Organisation has revealed that £25 million was spent on average in the local economy each month in 2019, as a direct result of the region's tourism and hospitality industry. The number of tourism jobs across the district showed a 9% increase between 2017 and 2019, to 8,664, accounting for 20% of Thanet's total employment last year.

These are official figures & show a year on year increase in tourism to Thanet. These are real jobs that actually exist in a sustainable industry. An industry that would be destroyed by having low flying cargo planes overhead every 15-20 minutes. Who would want to visit a noisy polluted area? There is no doubts with more people taking staycations tourism to Ramsgate will grow further.

**11.1.6. In considering these matters the ExA has found no relevant matters of such importance that they would individually or collectively lead to a different recommendation to that set out below.**

**11.2.10. The ExA concludes that there are impacts of the Proposed Development in terms of noise impacts which weigh against making the proposed Order.**

**11.2.16. The ExA has considered the requests for powers to compulsorily acquire land and rights which formed part of the application. The ExA concludes that the requests for powers do not meet all the tests set out in statute and in guidance.**



**11.2.17. In reaching this conclusion the ExA has had regard to the HRA1998 and consider that the interference with rights is not proportionate and in the public interest.**

**11.2.18. On the request for CA, the ExA concludes that it cannot be satisfied that there is a compelling case in the public interest for the land and rights over land to be acquired compulsorily.**

**11.3.1. For all of the above reasons and in the light of its findings and conclusions on important and relevant matters set out in this report, the ExA, under the procedures set down in the PA2008, recommend that the SoS should not grant development consent.**

**11.2.15. The ExA concludes, therefore, that on balance the benefits of this proposal would not outweigh its impacts.**

We have gone through a process that is extremely biased in favour of the applicant and in spite of that have proven our case. A DCO is meant to be a balance of need against the impact on the environment & people's lives. RSP are trying to greenwash their plans by saying it will be carbon neutral but don't include aircraft or vehicles needed to service it. There are so many evidenced reasons for not granting this DCO and as far as we can see none for. All the evidence & facts from aviation experts weighs heavily in favour of refusal. At the end of the day it is a speculative project that will blight a town of 40,000 people with noise & pollution for absolutely no gain. It would destroy people's health, their livelihoods and make their day to day lives miserable for no gain. It would also impact on people's human rights to enjoy their gardens, allotments, open spaces, parks & beaches. It will affect children's education as classes will be disturbed. Noise levels of over 100db have been regularly recorded at Chatham House School. You would not be allowed to work in such levels without a risk assessment & ear protection. RSP are disguising how loud the sound is over Ramsgate by using average noise contours. An alarm clock may ring for 2-3 minutes at 70-80db but if you average that out over an hour the noise level seems insignificant but during the time it is ringing it is loud. We also disagreed with RSPs noise levels. They were produced by someone who had no experience in noise on software he hadn't used before. We were so concerned we helped pay for some from the CAA. RSP could have commissioned their contours from the CAA but we suspect it would not have given the result they wanted.

To put things into perspective we are including an illustration of the topography of Nethercourt estate & how various public safety zones (PSZs) would impact us. The vibration from overflying planes would damage heritage & listed buildings. PSZs would also cause a planning blight over most of Ramsgate with business's & residents being unable to improve their properties' and in some cases having to move out (1:10,000 risk).

<https://en-gb.topographic-map.com/maps/sm4c/Kent/>

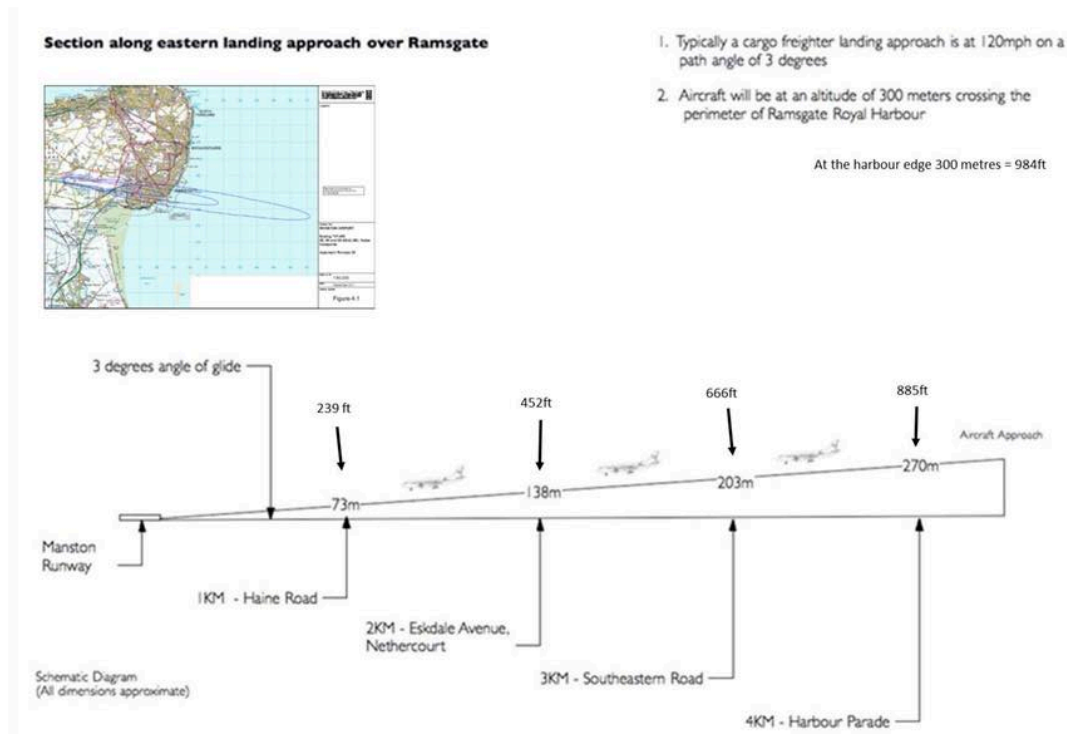
Runway Height 156ft

Estate is between 128ft and 133ft

Estate is between 1500m and 2500m from the runway

Town is 1500 to 4500m from runway, peak height 158 ft.

With a 3 degree approach, overflying estate at between 400 and 480 ft.



The area of a Public Safety Zone corresponds to the 1 in 100,000 individual risk contours for an airport. These tend to be two triangular shapes extending out for 3-4 kilometers from either end of the runway. Whilst aircraft follow a number of routes surrounding an airport, it is statistically more likely for an airport-related aircraft incident to occur on landing rather than on take-off so the landing PSZ tends to be a longer triangle than the take-off triangle.

The last Master plan done for Manston in 2010 acknowledged that its PSZ should have been done in 2006. It was not. But by looking at other airports and knowing the pattern of aircraft take off and landings at Manston it is possible to gauge the likely shape of the PSZ that would affect Ramsgate. There have been several incidences at Manston which have been entered into evidence already.

The number of variables to be taken into consideration when determining the risk contours are:

- Annual traffic movements
- Maximum Take Off Weight Authorised (MTWA)
- The crash consequence model includes population density
- The number of crashes per million movements done by using crash rates for each aircraft class
- The crash location model for large and light aircraft

Aircraft landing at Manston used to line up at 300 metres above the harbour and descended across the most densely populated area of Ramsgate to the runway at the edge of town. Depending on the exact trajectory, they would overfly one of three schools. The majority of movements were noisy cargo flights from Ghana, Kenya and Egypt.

The 1 in 10,000 contour would most likely be a triangle extending a 1-1.5 km beyond the end of the runway. The 1 in 100,000 contour, and thus the PSZ, would extend approximately 3.5-4 km from the end of the runway. It would cover a substantial area of Ramsgate right down to the harbour and including part of the town centre. Three schools, Clarendon House Grammar School, Christ Church Primary School and Ellington Infant School, are within the 1 in 100,000 risk contour.

The 1 in 10,000 risk contour would include a number of residential streets including Kirkstone, Whinfell, Drybeck, Kentmere avenues and part of Windermere Avenue. "The Secretary of State wishes to see the emptying of all occupied residential properties, and of all commercial and industrial properties occupied as normal all-day workplaces, within the 1 in 10,000 individual risk contour."<sup>1</sup> These residents would need to be moved.

Manston shut over 7 years ago. There was no crisis in runway capacity. It employed less than 150 people part time on zero hour contracts. The truth is nobody really noticed apart from residents who no longer had to put up with the noise & pollution. Taking all the evidence of past failures & expert opinion into consideration along with the governments own legally binding climate targets it would be ludicrous for the DCO to be granted. If it should be we will, of course, be pursuing another judicial review.

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<sup>1</sup>DfT Circular 1/2010

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The ANPS has now been ratified by parliament and has survived a number of legal challenges so it looks like Heathrow's third runway could go ahead, although there may be a delay due to the effects of covid. If and when demand picks up these plans could be easily revived. Heathrow is currently capped at 480,000 ATM's, runway three will add capacity for another 260,000.ATMs, a 54% rise in capacity. Any lack of demand in the interim due to Covid will leave slots open for cargo flights into Heathrow if needed and a return to bellyhold when passenger flights pickup.

East Midlands has an expansion plan too. It is getting bigger, so even more planes can park at the same time. The airport is improving its infrastructure so that aircraft can load and unload more efficiently at busy times. Work started in 2019 to build more aircraft parking space at East Midlands Airport & warehousing to accommodate the cargo so growth is underway. Aircraft that serve the Fed Ex/TNT, UPS, Amazon and Royal Mail

operations use the east apron, a large concrete area at the M1 end of the airfield. This is being widened to allow up to four more aircraft stands so four aircraft can be parked at any one time. Also at the east side of the airport, UPS's new facility is taking shape. The £114m development will double the size of its operation at EMA making it the company's largest air logistics facility outside the US.

As part of the Budget 2021 the Chancellor Rishi Sunak has confirmed that East Midlands Airport has been granted Freeport status. Because of this there are manufacturing & warehousing companies investing nearby.

An agreement not to use the second runway at Gatwick is also coming to an end. The runway is currently used as a taxiway and for emergencies. Under plans in place it could be operating short-haul flights by the end of the decade. Details of the expansion were first proposed in 2018's "Master Plan" for the airport, which said that an extra runway would add 55,000 flights a year. Gatwick Airport has lost BA. Although Gatwick doesn't focus on freight it will now have to diversify to stay open. They already have all the infrastructure needed in place, are up and running with direct access to a road network. It has to be pointed out that in April 2021 Gatwick told investors that expansion of London's airport capacity was not required until at least 2030 due to the impact of covid travel restrictions on passenger demand.

All of these airports have much better transport links to the rest of the UK than Manston. The use of Manston during the covid crisis showed the road connections were inadequate with both the A299 & M2 being just two lanes. These being the only major roads out of Manston with no intersection with any other motorway until the M25 at Dartford or the A249 to join the M20. Dartford is regularly snarled up around the M2/M25 junction with hold ups lasting hours, especially when the bridge has to shut due to high winds. This is something that is happening more & more with changing weather patterns, ironically probably down to global warming. If you draw a circle round the catchment areas of other airports and then draw that around Manston 75% is sea. Competitor airports like Gatwick East Midland, Stansted, Southend & Heathrow will struggle post covid. They are going to fight like hell for market share and undercut Manston. They are all up and running with a proven track record. RSP are already in a position where they would have to charge high landing fees etc just to service construction costs.

There was never any need for Manston to reopen as the examiners have concluded. At the oral hearings RSP's own expert Sally Dixon could not say whether the project was economically viable. She said it was something she had never been asked. It seemed to us her entire evidence boiled down to anecdotes one of which was a lot of freight is trucked into the UK as cargo aircraft could not find slots at UK airports. Apart from the fact the examiners found that to be untrue it is worth pointing out that trade has dropped with Europe by 40% since Brexit. There are no manufacturing or distribution hubs anywhere near Manston. Anything landed at Manston would need to be forwarded by truck or a further flight. That really defeats the object when aircraft could fly on to better



located airports in minutes. Mr Freudmann's latest idea of using electric barges from Ramsgate port is a joke. Who in their right mind will land at Manston, unload, load onto lorries, drive to the port, unload, load on to barges, sail up to London ports, unload & then load onto lorries for their final destination. Of course the major hurdle in this is where are these barges miraculously going to appear from? They keep claiming companies like Ryanair & KLM will use Manston. The truth is RSP have no commitment from any airline whatsoever to use Manston. It seems RSP's plans get more ludicrous as it goes on. It has the makings of another Seabourne debacle.

It is also worth noting that the CAA has refused to pass the latest stage of RSP's application for flight paths & aerodrome licence. As this is at a very basic stage they should have passed this stage easily. Given all the safety concerns an airport involves we don't think it bodes well for the future.

There is always the question of financing. Who in their right mind would ever invest at Manston it has failed three times, losing investors, Kent County Council & Thanet District Council thousands of pounds. Mr Freudmann is very shy about exactly who is supposedly investing. To be honest we are doubtful they even exist. Mr Freudmann himself is on record as saying RSP would not be taking the project forward financially but would be looking for further investors. We are also concerned there does not seem to be any due diligence regarding funding of RSP, a company based in the British Virgin Isles and the absence of any credible business plan put forward. It seems all RSP funds are funnelled through Freudmann Tipple a company owned by Anthony Freudmann & Eleanor Freudmann. It also seems Mr Freudmann has never ever run a successful business and has been struck off as a solicitor for misappropriating clients funds. Any investor doing the most basic checks would find this out. Mr Freudmann says Manston failed due to poor management but fails to point out he was at the helm during one such failure when loads of small investors lost their money

**Clause 8.2.177 Direct jobs at the airport would be 19% lower than forecast.**

**Clause 8.2.180 The ExA has significant doubts over the calculation of direct, indirect/induced, and catalytic job numbers.**

**Clause 8.2.184 The Proposed Development would adversely affect the tourism industry in Ramsgate.**

The big argument for Manston has been employment. We have always argued that RSP's direct & indirect figures were fantasy. They have never been able to quantify or qualify what jobs would be available relying on obscure "multipliers" to arrive at some

notional figure which bear no resemblance to real life. This is another claim Mr Freudmann is back peddling on saying automation would reduce the number of jobs created. As it was always planned by RSP to be a state of the art cargo hub we have to wonder why he has only just come to that conclusion. It has been pointed out that any jobs created at Manston will be at the detriment of those at another airport.

According to research in 2017 visits to Thanet increased by 8.6% with the district welcoming a record 4.2 million visitors,. The value of Thanet's visitor economy grew by 9.2% in 2017 and is now worth over £319 million. Independent research commissioned by Visit Kent showed that the number of day trips to the Thanet district leapt by 9.9% in 2017, meanwhile the total number of nights stayed in the district increased by 4.9%. The total number of jobs supported by tourism rose by 8.7% to 7,950, with the industry accounting for an impressive 19% of total employment across Thanet.

Kent's latest Tourism Economic Impact Study shows that, before the devastating impact of the COVID-19 pandemic, Thanet's visitor economy was valued at £352 million, after welcoming 4.6 million visitors in 2019. Independent research commissioned by Kent's official Destination Management Organisation has revealed that £25 million was spent on average in the local economy each month in 2019, as a direct result of the region's tourism and hospitality industry. The number of tourism jobs across the district showed a 9% increase between 2017 and 2019, to 8,664, accounting for 20% of Thanet's total employment last year.

These are official figures & show a year on year increase in tourism to Thanet. These are real jobs that actually exist in a sustainable industry. An industry that would be destroyed by having low flying cargo planes overhead every 15-20 minutes. Who would want to visit a noisy polluted area? There is no doubts with more people taking staycations tourism to Ramsgate will grow further.

**11.1.6. In considering these matters the ExA has found no relevant matters of such importance that they would individually or collectively lead to a different recommendation to that set out below.**

**11.2.10. The ExA concludes that there are impacts of the Proposed Development in terms of noise impacts which weigh against making the proposed Order.**

**11.2.16. The ExA has considered the requests for powers to compulsorily acquire land and rights which formed part of the application. The ExA concludes that the requests for powers do not meet all the tests set out in statute and in guidance.**

**11.2.17. In reaching this conclusion the ExA has had regard to the HRA1998 and consider that the interference with rights is not proportionate and in the public interest.**

**11.2.18. On the request for CA, the ExA concludes that it cannot be satisfied that there is a compelling case in the public interest for the land and rights over land to be acquired compulsorily.**

**11.3.1. For all of the above reasons and in the light of its findings and conclusions on important and relevant matters set out in this report, the ExA, under the procedures set down in the PA2008, recommend that the SoS should not grant development consent.**

**11.2.15. The ExA concludes, therefore, that on balance the benefits of this proposal would not outweigh its impacts.**

We have gone through a process that is extremely biased in favour of the applicant and in spite of that have proven our case. A DCO is meant to be a balance of need against the impact on the environment & people's lives. RSP are trying to greenwash their plans by saying it will be carbon neutral but don't include aircraft or vehicles needed to service it. There are so many evidenced reasons for not granting this DCO and as far as we can see none for. All the evidence & facts from aviation experts weighs heavily in favour of refusal. At the end of the day it is a speculative project that will blight a town of 40,000 people with noise & pollution for absolutely no gain. It would destroy people's health, their livelihoods and make their day to day lives miserable for no gain. It would also impact on people's human rights to enjoy their gardens, allotments, open spaces, parks & beaches. It will affect children's education as classes will be disturbed. Noise levels of over 100db have been regularly recorded at Chatham House School. You would not be allowed to work in such levels without a risk assessment & ear protection. RSP are disguising how loud the sound is over Ramsgate by using average noise contours. An alarm clock may ring for 2-3 minutes at 70-80db but if you average that out over an hour the noise level seems insignificant but during the time it is ringing it is loud. We also disagreed with RSPs noise levels. They were produced by someone who had no experience in noise on software he hadn't used before. We were so concerned we helped pay for some from the CAA. RSP could have commissioned their contours from the CAA but we suspect it would not have given the result they wanted.

To put things into perspective we are including an illustration of the topography of Nethercourt estate & how various public safety zones (PSZs) would impact us. The vibration from overflying planes would damage heritage & listed buildings. PSZs would also cause a planning blight over most of Ramsgate with business's & residents being unable to improve their properties' and in some cases having to move out (1:10,000 risk).

<https://en-gb.topographic-map.com/maps/sm4c/Kent/>

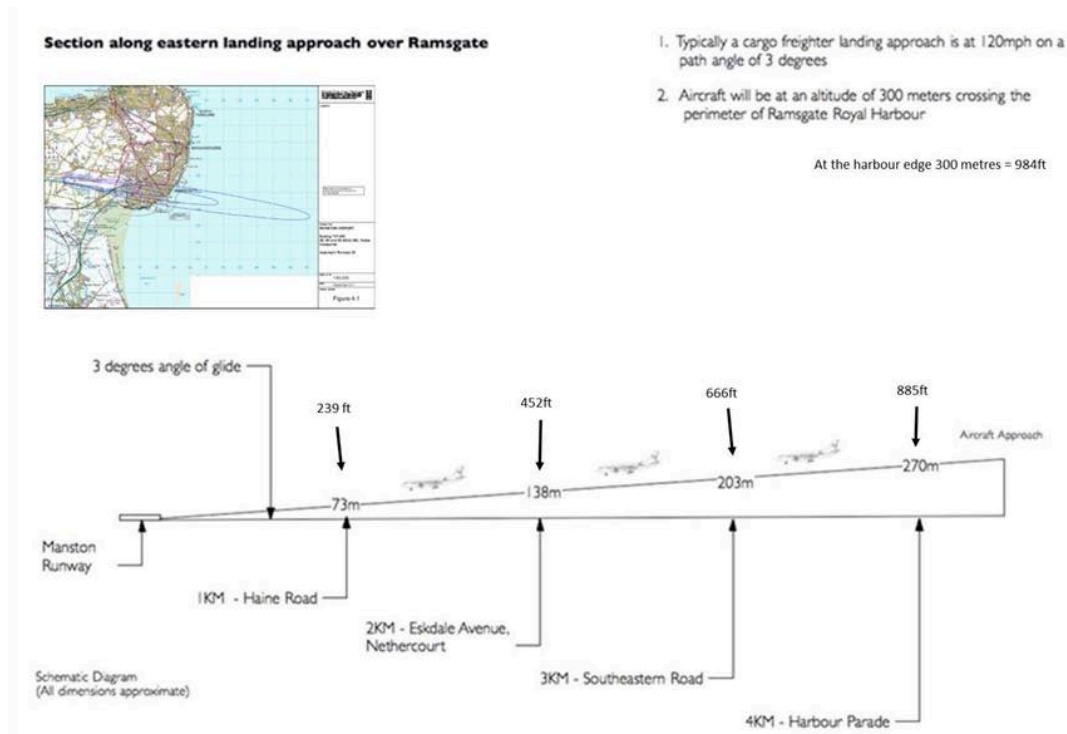
Runway Height 156ft

Estate is between 128ft and 133ft

Estate is between 1500m and 2500m from the runway

Town is 1500 to 4500m from runway, peak height 158 ft.

With a 3 degree approach, overflying estate at between 400 and 480 ft.



The area of a Public Safety Zone corresponds to the 1 in 100,000 individual risk contours for an airport. These tend to be two triangular shapes extending out for 3-4 kilometers from either end of the runway. Whilst aircraft follow a number of routes surrounding an airport, it is statistically more likely for an airport-related aircraft incident to occur on landing rather than on take-off so the landing PSZ tends to be a longer triangle than the take-off triangle.

The last Master plan done for Manston in 2010 acknowledged that its PSZ should have been done in 2006. It was not. But by looking at other airports and knowing the pattern of aircraft take off and landings at Manston it is possible to gauge the likely shape of the PSZ that would affect Ramsgate. There have been several incidences at Manston which have been entered into evidence already.

The number of variables to be taken into consideration when determining the risk contours are:

- Annual traffic movements
- Maximum Take Off Weight Authorised (MTWA)
- The crash consequence model includes population density
- The number of crashes per million movements done by using crash rates for each aircraft class
- The crash location model for large and light aircraft

Aircraft landing at Manston used to line up at 300 metres above the harbour and descended across the most densely populated area of Ramsgate to the runway at the edge of town. Depending on the exact trajectory, they would overfly one of three schools. The majority of movements were noisy cargo flights from Ghana, Kenya and Egypt.

The 1 in 10,000 contour would most likely be a triangle extending a 1-1.5 km beyond the end of the runway. The 1 in 100,000 contour, and thus the PSZ, would extend approximately 3.5-4 km from the end of the runway. It would cover a substantial area of Ramsgate right down to the harbour and including part of the town centre. Three schools, Clarendon House Grammar School, Christ Church Primary School and Ellington Infant School, are within the 1 in 100,000 risk contour.

The 1 in 10,000 risk contour would include a number of residential streets including Kirkstone, Whinfell, Drybeck, Kentmere avenues and part of Windermere Avenue. "The Secretary of State wishes to see the emptying of all occupied residential properties, and of all commercial and industrial properties occupied as normal all-day workplaces, within the 1 in 10,000 individual risk contour."<sup>1</sup> These residents would need to be moved.

Manston shut over 7 years ago. There was no crisis in runway capacity. It employed less than 150 people part time on zero hour contracts. The truth is nobody really noticed apart from residents who no longer had to put up with the noise & pollution. Taking all the evidence of past failures & expert opinion into consideration along with the governments own legally binding climate targets it would be ludicrous for the DCO to be granted. If it should be we will, of course, be pursuing another judicial review.

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<sup>1</sup>DfT Circular 1/2010