

**From:** [REDACTED]  
**Subject:** [Manston Airport](#)  
**Date:** 08 July 2021 14:16:49  
For the attention of the Manston Airport Case Team

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Dear Sir,

We live on the [REDACTED] in Ramsgate, under the flight path of the former Manston Airport, and are extremely worried over the prospect of it re-opening. Since its closure we have noticed an improvement in our health, sleep and the re-generation in the town, which has brought in many visitors to our historic town. We and our children and grandchildren are, once again, able to enjoy the outside life, without the fumes, pollution and noise we were expected to put up with 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 pitfalls of the airport on their lives and futures.

EXA's responded that the level of freight that the proposes development could expect to handle are modest and could be catered for at existing airports (Heathrow, Stansted, East Midlands airports and others) if the demand existed. The EXA considers that Manston appears to offer no obvious advantages to outweigh the strong competition that such airports offer, and therefore concludes that the applicant has failed to demonstrate sufficient need for the proposed development.

Manston has failed three times with the losing owners investors TDC & KCC millions. There have been four reports from credible aviation experts, Falcon Consultancy, Avia Solutions, Altitude Aviations and York Aviations, all showing that Manston Airport is unviable and unnecessary. York Aviation states that the applicant has not provided any evidence that would be worthy of a DCO. We had four very experienced planning inspectors who conducted a long examination for the DCO. They took many hours of oral evidence and hundreds of written submissions into consideration. More people took part in this DCO examination than any other with the majority being opposed to RSP's plans. The examiners conclusion was the DCO should be refused on many issues. In spite of this overwhelming evidence the SoS decided to pass it anyway but had to concede a judicial review because he couldn't back up his decision. I am sending my submission again as Manston is still unviable for the same reasons it was last time.

If the SoS should go against all the evidence again and pass the DCO I will, of course, be supporting another judicial review financially.

### **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 airport at Manston.

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.

## **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 5 long years pointing to the extremely poor credentials of the Applicant.

The Applicant:

Has been rejected twice as a viable airport operator

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.

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.

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**

Historically, the type of craft used were Tiger Moths or today's single-engine training aircraft and gliders. I'm concerned that the developers might interpret this as allowing thousands of Jumbo jets and other like sized planes into the airport, flying a mere 300-600 feet above our town, and not paying the slightest attention to either environmental factors or any kind of good neighbour policy.

## **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 not acceptable.

Our experience of the former airport is of planes flying over extremely low over our house at almost 100db, which was even worse when it happened at night and disrupted our sleep and affected our health.

## 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 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** 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.

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.

## 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.

Regards,

Thomas Norton Reg. No. 20013224

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