

Susan Kennedy



9<sup>th</sup> July 2021

Dear Department of Transport

### **Regarding Redetermination of Manston Cargo DCO**

I write as a Ramsgate Resident, an Interested Party and as a founding member of the No Night Flights (NNF) residents' group which has opposed night flights in and out of Manston Airport for over 12 years.

Riveroak Strategic Partners (RSP) applied for a Development Consent Order (DCO) and their application was examined by the Examining Authority (ExA) appointed by the National Planning Inspectorate. During the examination period, myself, NNF, numerous residents' groups, the local council and thousands of individual residents made submissions to the ExA, to the extent that they commented on the unprecedented quantity and quality of submissions. This community cares about our town, our health, our environment, our local economy, our older, youngest and most vulnerable populations. We have fought this long and hard. We were delighted therefore to find the ExA agreed with us that there is no need for the proposed airport and that, were it to go ahead, it would have significantly damaging effects on the local population and area.

In common with so many, I was bemused to then find the Secretary of State (SOS) overturn that recommendation. It beggar's belief that expert opinion, based on evidence, should be required and then ignored.

We now find ourselves having to provide submissions once again as the SOS asks 'what's changed' in the intervening period. What has happened in the interim, of course, is that an individual resident, Jenny Dawes, has bravely taken on a personal role in bringing a judicial review, paid for by the individual contributions of so many of us, with costs running into £100, 000s. That judicial review was successful and the SOS was found wanting in terms of having any evidence that supported his ignoring of the recommendation of the ExA. Hence, the SOS, desperately in need of evidence, has asked for further submission, particularly focused on the last two years.

Our frustration knows no bounds. We have endured years and years of this. The evidence was collected, rigorously analysed and presented to the SOS who then chose to ignore it. Shifting the goal posts, he now asks us again. The last two years, atypical and unprecedented as they have been, can be looked at although a changing process that continues to move deadlines forward seriously compromises that process and completely destroys the public's faith in any DCO and planning process. Nevertheless, here we go again. What cannot be ignored, and should not be ignored this time, is the EXISTING evidence and analysis.

## There is still no need

1. Successive reports by aviation experts, Falcon Consultancy, Avia Solutions, Altitude Aviation, Alan Stratford and Associates, York Aviation, have all concluded that neither a passenger nor cargo hub operation would be viable at the Manston site and that there is simply no need for this airport, an airport that has repeatedly failed in the past.
2. The Avia Solutions Report of 2016 <sup>1</sup> Avia Solutions provided an updated view in August 2017 when they concluded that their 'opinion, based on updated market information.....is consistent with our earlier view that Manston Airport does not represent a financially viable investment opportunity under normal conditions.'<sup>2</sup>
3. RSP's business case largely depends on the analysis and report by Dr Sally Dixon, in her Azimuth Reports. These have been heavily criticised for their flawed methodology and simplistic analysis. Most damningly, Avia Solutions, in their August 2017 report, criticised Azimuth as a work of assertion rather than evidence of systematic analysis of the potential market for Manston.<sup>3</sup> Similarly, York Aviation have been highly critical of the Azimuth reports saying that 'the analysis by Azimuth shows a lack of understanding of the economics of the air freight market.'<sup>4</sup>
4. The York Aviation Report 2017 concluded that Manston was economically inefficient and lacked the potential to succeed due to inherent lack of viability. It determined that there were far more economically viable and efficient solutions to cargo/freight needs. York Aviation were clear that Manston could only attract a very limited number of cargo air traffic movements and that there was no requirement or need for Manston as a cargo hub airport.
5. The York Aviation Report 2019 was again deeply critical of RSP's need case and pointed to the fact that they neglected to take into account the plan for increased capacity at Heathrow as per the ANPS given that they used only pre-ANPS evidence. They felt that this was deliberately misleading and incorrect. The report also concluded that multiple errors and inconsistencies in formulae and algorithms on which demand forecasts were based meant those projections were exaggerated and unreliable. Notwithstanding, the report concluded that even if those projections were credible, the 'scale of development was unjustified and excessive'.
6. The National Planning Inspectorate's appointed Examining Authority conducted an examination of all the evidence in 2019. They concluded in July 2019:
  - 6.1. ***"Given all the above evidence, the ExA concludes that the levels of freight that the Proposed Development could expect to handle are modest and could be catered for at existing airports (Heathrow, Stansted, EMA, 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. The ExA therefore concludes that the Applicant has failed to demonstrate sufficient need for the Proposed Development, additional to (or different from) the need which is met by the provision of existing airports."***
7. Arguably, the time slippage with regard to the development of a third runway at Heathrow, could have created need for additional freight operations in the interim. As was the case at the time of the Examining Authority's deliberations and conclusions, there is still capacity at existing

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<sup>1</sup> AviaSolutions Report September 2016 - <http://content.tfl.gov.uk/air-freight-implications-from-new-capacity.pdf>

<sup>2</sup> AviaSolutions Report August 2017

<sup>3</sup> Avia Solutions Report August 2017

<sup>4</sup> York Aviation, Summary Report Analysing Use of York Aviation Material by Riveroak Strategic Partners Ltd and Assessment of Capability of Manston Airport, November 2017

airports. There is absolutely no evidenced new need that would require a new NSIP at Manston. Manston, as always, is a solution in desperate search of a problem.

8. The designation of Freeport zones provides no benefit to Manston. Indeed, the East Midlands Freeport provides real benefits to East Midlands Airport which is already the UK's largest and most dedicated cargo hub. It is to East Midlands Airport that operators will be attracted, not Manston.
9. The York Aviation Report 2021 has updated their analysis of need and has confirmed the decline in dedicated cargo freight into the UK with more and more freight being belly hold. The UK has an incredibly wide network of both short and long-haul flights that encourages belly hold freight and which means it is cheaper than dedicated cargo operations. Even whilst COVID-19 has reduced the numbers of flights drastically, it is expected to be a temporary problem lasting no more than two years. Again, Manston is not the solution to this problem. The York Aviation Report also states that 'there is no systematic evidence that Brexit related border issues at the ports have resulted in any increase in demand for air freight services' and concludes 'there is no compelling evidence to suggest that the UK's withdrawal from the European Union contributes to an alleged need for the development and reopening of Manston Airport'. The report also reaffirms, as previous reports, the capacity at other airports, existing and planned, to meet any need. Manston is simply not required.

### Local Policy

1. Thanet District Council (TDC) has its 2019 Local Plan which continues to safeguard the Manston site for airport related uses. However, TDC make clear that this will be subject to review once the outcome, either way, of the DCO is known.
2. On 11 July 2019, TDC declared a climate emergency which was warmly welcomed by residents. Any development of a cargo hub at Manston is clearly incompatible with the aims of the council, as indeed it is with the government's own stated climate emergency goals and agreements.
3. TDC is committed to improving very high, particularly among young people, unemployment rates in the area. Decades of promises of jobs by owners of the Manston site have failed to deliver. The thousands of jobs promised over and over again, this time by RSP, are simply fantasy. What Thanet residents need and want are real jobs that can be delivered on the back of a thriving and growing tourism and leisure sector (stalled temporarily due to COVID), ongoing regeneration and the development of green jobs. Thanet stands well to benefit from the staycation boom we are currently experiencing and which can continue to grow.

### Climate Change

Given the country's commitment to a set carbon budget for 2033-2037, which includes aviation emissions, we simply cannot build a new cargo hub airport. Building at Manston would have to mean constraining capacity at other, existing airports which is clearly nonsensical.

### Previous failure

1. Manston failed as a freight airport for years. (See Appendix A) Between 1991 and 2014, the airport accounted for no more than 1-2% of the UK's air freight and lost between £4-5 million each year of its commercial life. Under three private owners, freight formed the core component of the airport's growth strategy from 1999 until its closure in 2014. Since Manston started operating as a commercial cargo airport in 1999, the number of cargo flights (ATMS) across UK

airports has shrunk, from 108,000 in 2000 to 52,000 in 2016. The most recent (2017) Department for Transport forecast to 2050 assume the number of freight flights in the UK will remain flat at 2016 levels. The market has halved and Manston did not succeed when there was twice as much business to go for. The market is not going to grow. There is no evidence of national need for a new freight airport. For a new airport to succeed, it would need to tempt 12,000 freighter flights away from successful, established cargo airports that have capacity.

2. In 2015, KCC said:

2.1. *The truth is that Manston has failed over a prolonged period of time to run as a commercially successful airport. Kent County Council gave strong support to various investors but the reality of commercial aviation at Manston Airport led to very significant losses. In fact, in the 16 years since it was taken into private ownership it has incurred losses by those who have tried to operate it in excess of £100 million. The objective now must therefore be to make sure that we have owners who want to do exciting things on the site and that the land is not left abandoned. Bristow Group had chosen Manston as its location for the regional search and rescue base; when the airport closed the company decided to locate that base at Lydd. Kent County Council is pleased that this vital service will still be located in Kent. Lydd Airport is also starting a substantial investment programme to extend its runway and construct new aviation facilities. Surely it is now time to look at a B Plan for Manston.*<sup>5</sup>

### The impact of a cargo hub airport

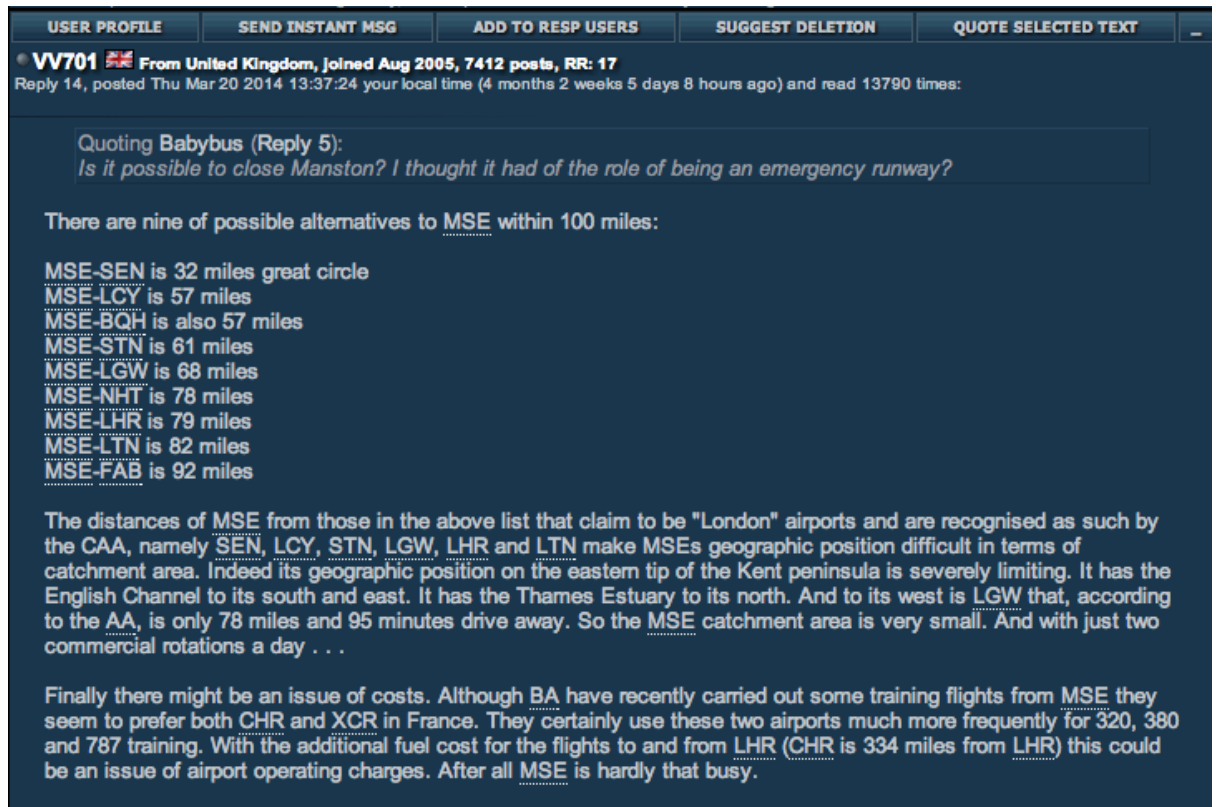
I would urge the SOS to actually read the ExA report and the very many expert opinions on impact. I would specifically urge the SOS to read of residents' lived experiences. Impact is not hypothetical for us, we have lived with planes taking off and landing. We know the impact.

1. Ramsgate has fully experienced planes taking off and landing at Manston. Residents know only too well the impact in terms of noise, both day and night. The evidence as to the damage of planes flying so low overhead is well established and the distance between the runway and a conurbation of over 40,000 is only 1 mile, much less than at most airports.
2. Noise and the impact on health and wellbeing. Again, there is sufficient evidence nationally and internationally, that has been submitted to the ExA, that the SOS should familiarise himself with if he has not already done so.
3. Ramsgate has a thriving and growing tourism and leisure industry. It has also increasingly benefited, in recent years, from people relocating here, particularly from London and with people buying homes, starting businesses, employing local labour and services, there has been a significant regeneration in one of the poorest coastal communities in the country. The growth overall and regeneration and the leisure and tourism sector particularly would be destroyed by a cargo hub in such close proximity.
4. Previous owners, Sir Roger Gale and RSP have all kept some local support going for Manston by promising, even within the DCO application, that passenger operations will succeed from this site. This is despite all evidence to the contrary at an airport that has tried repeatedly, in far better times, to attract airlines and passengers. Fundamentally, Manston's geography works

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<sup>5</sup> Kent County Council Position Statement on Manston, 2015

against it. I quote from an online forum for pilots from 2014 at the point of the closure of the airport:



The screenshot shows a forum post with a header bar containing buttons: USER PROFILE, SEND INSTANT MSG, ADD TO RESP USERS, SUGGEST DELETION, and QUOTE SELECTED TEXT. The post is from user VV701, joined in August 2005, with 7412 posts and a reputation of 17. It is a reply to a thread about closing Manston airport, posted on March 20, 2014. The post quotes another user asking if it's possible to close Manston as an emergency runway. The user then lists nine alternative airports within 100 miles of MSE: SEN (32 miles), LCY (57 miles), BQH (57 miles), STN (61 miles), LGW (68 miles), NHT (78 miles), LHR (79 miles), LTN (82 miles), and FAB (92 miles). The user explains that London airports like SEN, LCY, STN, LGW, and LTN have small catchment areas due to their location on the Kent peninsula. Finally, the user mentions that BA uses CHR and XCR in France for training flights, and that LHR is busy, making MSE a less viable alternative.

USER PROFILE    SEND INSTANT MSG    ADD TO RESP USERS    SUGGEST DELETION    QUOTE SELECTED TEXT

• **VV701**  From United Kingdom, joined Aug 2005, 7412 posts, RR: 17  
Reply 14, posted Thu Mar 20 2014 13:37:24 your local time (4 months 2 weeks 5 days 8 hours ago) and read 13790 times:

Quoting Babybus (Reply 5):  
*Is it possible to close Manston? I thought it had of the role of being an emergency runway?*

There are nine of possible alternatives to MSE within 100 miles:

- MSE-SEN is 32 miles great circle
- MSE-LCY is 57 miles
- MSE-BQH is also 57 miles
- MSE-STN is 61 miles
- MSE-LGW is 68 miles
- MSE-NHT is 78 miles
- MSE-LHR is 79 miles
- MSE-LTN is 82 miles
- MSE-FAB is 92 miles

The distances of MSE from those in the above list that claim to be "London" airports and are recognised as such by the CAA, namely SEN, LCY, STN, LGW, LHR and LTN make MSEs geographic position difficult in terms of catchment area. Indeed its geographic position on the eastern tip of the Kent peninsula is severely limiting. It has the English Channel to its south and east. It has the Thames Estuary to its north. And to its west is LGW that, according to the AA, is only 78 miles and 95 minutes drive away. So the MSE catchment area is very small. And with just two commercial rotations a day . . .

Finally there might be an issue of costs. Although BA have recently carried out some training flights from MSE they seem to prefer both CHR and XCR in France. They certainly use these two airports much more frequently for 320, 380 and 787 training. With the additional fuel cost for the flights to and from LHR (CHR is 334 miles from LHR) this could be an issue of airport operating charges. After all MSE is hardly that busy.

## Conclusion

The Department will be hearing from many of us. Impassioned, emotional, forceful and engaged. That's who we are as a community. We have submitted reasoned, logical, evidenced submissions again and again and there has been an incredible amount of time spent by individuals and groups over many, many years.

We were asked to have faith in the DCO application and examination process. We did. We engaged. We fully expect the recommendations of the ExA to be adhered to. Nothing has changed in the intervening period. Nothing material, that is. Yes, there has been a pandemic, yes, Brexit has happened and yes, international passenger and freight aviation has been seriously disrupted. However, all expert opinion is still agreed that the 'normal' freight transport will resume and that the downward trajectory of dedicated freight movements will continue with the preferred belly hold operations continuing to increase.

What also continues to be true is the urgent need to balance trade with a serious reduction in aviation emissions and the adherence to our own and international climate emergency goals. Manston plays no part in this and any perverse decision to agree this DCO would seriously call into question this government's commitment to seriously tackling climate change.

Finally, as a resident of Ramsgate, I would urge that the very real needs of our community are not only factored in but are foregrounded. We are a relatively deprived coastal community with serious health and unemployment issues. Nonetheless, we are a community that is working hard to regenerate our town and there is considerable civic pride. We need this like a hole in the head. We want green jobs, real investment, homes for everyone and a diverse and thriving local economy within an environment that can be maintained and enhanced for residents and visitors alike.

Yours sincerely

Susan Kennedy

## Appendix A: Background

From 1999 to 2014, Manston ran as a commercial airport. It had three separate owners. Each tried to develop it as a cargo airport. Each tried to develop passenger operations. Local residents were promised the airport could handle hundreds of thousands of tonnes of cargo. Residents were promised thousands of jobs. Residents were promised 100s of passenger flights. The Wiggins Group, claimed by 2002 it would carry 200,00 tonnes a year. In 2002, Manston shifted 32,240 tonnes. Thanet District Council at one stage prediction 250,000 tonnes of cargo to be shifted in 2011. In 2011, Manston shifted 27.495 tonnes.

Every year between 1999 and 2014, Manston accounted for no more than 1-2% of the UK's air freight. The vast majority of freight into the UK comes in the belly hold of passenger flights. The dedicated freight market is small. And Manston was only ever a tiny fraction of that already small market. (96% of all freight into the UK comes in by sea. Example: Port of Ipswich alone in 2015 handled 2.293 tonnes of cargo; in 2015 the entire UK air cargo market handled 2.299 tonnes of cargo)

The Wiggins Group launched scheduled flights to 21 destinations in Europe in 2004 but collapsed into administration in the summer of 2005 leaving 5,4400 passengers stranded. Mr Tony Freudmann had overseen Manston's transfer from an RAF base to a commercial operation. He was Senior Vice President of Wiggins during the time it lost millions and then finally went into administration.

Infratil Ltd, which bought Manston from the administrators, lost between £40-50 million over the next nine years attempting to achieve passenger numbers. The highest number of passengers was 50,000. Its ambitious plans for freight likewise failed. KLM averaged 44.4% (52,859/119040) of capacity when flying to/from Manston.

Manston lost millions pounds every year of its commercial life. It closed in 2014 because it couldn't attract cargo airlines to use it. Manston only ever had around 500 freight flights a year. Very different from the 17,000 plus that RSP want.

IN March 2012, Infratil put Manston up for sale. At this point, it was valued on their books at over £90 million. That value dropped dramatically over the two years it was for sale. They finally sold it to Ann Gloag for £1 although she agreed to take on debt.

After a few months, it was clear to Ann Gloag that there was no future for Manston as an airport and it was closed in May 2014.

A petition alleging huge support to save the airport plus the active campaigning of Sir Roger Gale MP persuaded TDC to explore the possibility of a compulsory purchase of the site. Without the funds to do so themselves, they needed an indemnity partner. Potential partners were sought.

Riveroak Investment Corps Ltd appeared to be the only potential indemnity partners. An American real estate investment company, they had no experience of aviation. Their spokesperson was none other than Mr Tony Freudmann.

The council commissioned an independent report from aviation experts, Falcon Consultancy. They said that Manston was not viable as a passenger airport even with £100s millions of investment. A cargo hub airport, with inevitable night flights, could only be possible with additional industrial and manufacturing associated e.g. car manufacturers and, even then, success would be far from guaranteed.

TDC rejected RiverOak as an indemnity partner and said, among other things, that they lacked financial credibility.

With the election of 2015, the Labour administration at TDC was replaced by a UKIP one. One of the promises of the UKIP campaign was to 'bring back the airport'. The UKIP administration went through exactly the same process as the previous administration. Riveroak applied to be an indemnity partner and was found lacking. There was no other interest.

Riveroak Investment Corps then disappeared from the scene. Magically, a new Riveroak emerged – RiverOak Strategic Partners – a Belize-owned company, still headed by Mr Tony Freudmann and joined by two ex-employees of the original RiverOak.

Again, aided and abetted by Sir Roger Gale, the same men kept trying to take the land from its rightful owners. This time, they decided to do it via a national Development Consent Order which is granted to projects that have a compelling case in the public interest, that can demonstrate significant benefits which justify taking the land from its owners.

This application carries a high level of risk and uncertainty which makes it all the more incredible that it has reached this stage. The National Planning Inspectorate (PINS) has already made clear to RSP that they are insufficiently convinced to date about the funding for this project. The principal RSP directors have been seeking a compulsory purchase of Manston since 2004. Two successive administrations at Thanet District Council found them to be unable to demonstrate financial credibility and so rejected them as a potential indemnity partner. The directors have no track record in this sector other than failure and serial insolvency on the part of Mr Freudman, a struck off solicitor. Their application states that 'RSP anticipates that it will raise further equity and debt finance following the making of the DCO' making this akin to a speculative land grab. Throughout the application, the costs of the project are underestimated. RSP consistently claim that the value of the land is that of agricultural land (roughly 7m) rather than a value which acknowledges the open market value of land which, were it not for this application, would certainly receive planning permission. Their estimates for noise mitigation measures and for compensation to residents seem unduly optimistic.

RSP not only offer no financial business plan in their application but their overall business case relies totally on work undertaken by a former colleague of Tony Freudmann, Dr Sally Dixon. Dr Dixon's Azimuth Reports present the case for demand for a cargo hub at Manston as well as the forecasts for jobs, a key issue for many in relatively job-deprived Thanet. Her work completely contradicts that of 4 previous reports produced by separate, independent aviation experts. Misuse of the evidence in one report drew heavy criticism from them as they condemned her work as 'extremely optimistic, not credible or likely with negligible supporting evidence' and 'our overall conclusion is that RSP/Azimuth does not reflect market realities'.

Curious in this whole affair is the extent to which Sir Roger Gale MP has supported Tony Freudmann, first as the frontman for Riveroak Investment Corps Ltd and then as director of Riveroak Strategic Partners, together with two ex-employees of the original Riveroak. One wonders why he was so supportive of a company that was found to lack financial credibility and now why he is so willing to entrust a supposed nationally significant infrastructure project to a Belize-owned company with no obvious funds or track record. Roger Gale is on record on numerous occasions saying that he does not support night flights and that he believes RSP do not need or want night flights. One can only assume he has not read their application.



The issue of night flights has been clouded by repeated statements by RSP directors and their chief supporter, Sir Roger Gale, that night flights do not feature in their business case and that they are not needed. Niall Lawlor, one of the directors, told residents at one consultation meeting “We don’t want f\*\*\*ing night flights, we don’t need f\*\*\*ing night flights” which gives a flavour of the aggressive communication style of Mr Lawlor. They also claimed that the only reason night flights were included in their application was because the planning inspectorate had insisted upon it. A FOI request disproved this with PINS denying any such thing. RSP’s application includes a case for an annual quota count, essentially a noise budget for night flights, which determines the amount of noise from planes allowed in a given year. The proposal would see planes at a quota count (QC4) or below not being counted in that quota count meaning that QC4 Air Traffic Movements (ATMS) that are not allowed at London airports because they are too noisy, being allowed at Manston. This would be in addition to noisier planes that would fall into the noise budget. Their application also fails to distinguish between scheduled and chartered flights – an ambiguity that suits as many cargo flights are chartered rather than scheduled. It is clear that, as in the past, the aim is to try and attract freight operators with the opportunity to have flights during the night particularly given that the majority of dedicated freight operators require this flexibility.

The impact of noise on residents living under the flight path cannot be underestimated and RSP have not referred to previous monitoring data to create realistic noise contours in order to reduce the levels of noise predicted. Planes come in over Ramsgate at around 300m at the coast and steadily descend meaning that throughout its history there were regular recording of noise levels of between 80-100dBs. Government guidelines state that ‘noticeable and intrusive noise occurs at 51dBs during the day and 45dBs during the night. RSP acknowledge in their documentation that there will be a ‘significant adverse effect’ on residents.

The negative health impact on residents living in close proximity to an airport is well-evidenced and increased risk of hypertension, coronary heart disease/cardiovascular disease are just some of the adverse effects. Similarly, there is research showing the negative impact on children’s developing cognitive abilities and there is real concern locally about the schools under the flight path. Executive Headteacher of the Coastal Academies Trust, Paul Luxmoore, spoke at a public meeting recently saying that he ‘shuddered to think of the damage that will be done to our children’ if the proposal went ahead.

RSP’s proposed initial 10,000 – 17,000 flights p.a. are below the 18,000 threshold for the requirement of Public Safety Zones. Given the proximity of Ramsgate, with a population of over 40,000, the number of schools under the flight path, the height of aircraft over the town, the nature of cargo aircraft, the past history of the airport with some near misses, that lack of a local major A & E centre, the threat to the population has been neglected by RSP in their application.

Ramsgate is a town fast regenerating and has been growing a stronger and stronger visitor economy which brings significant amounts of money, jobs and business into the town. This is under threat. A major cargo hub airport less than 2km away with 17,000 flights a year would seriously impact on the quality of tourism offer that could exist.

A DCO for an airport has never been sought or granted. For a project to be considered a Nationally Significant Infrastructure Project (NSIP) and to be granted a DCO, there has to be a compelling case in the public interest for the land to be acquired compulsorily. Given that Manston was quickly sifted out of the Airport Commissions deliberations, given successive reports by aviation experts as to its lack of potential particularly due to its location, given existing capacity for freight at other airports in the south east and beyond, given the lack of evidence presented by RSP and given

credible plans by the owners for mixed-use of the site to include job creation and housing which fits with government targets and policy, it was extremely rewarding to see the Examining Authority recommend to the Secretary of State that the DCO NOT be awarded. It has been extremely hard to understand why the SOS then ignored this recommendation. Fortunately, the subsequent judicial review has forced the SOS to think again and yet how is it that this project continues against all evidence, analysis, legal review and recommendation. What is it about Manston that seen both local and national politicians champion it against all reason? Residents have had enough. There has been enough expert opinion to deny this DCO and to continue to champion it as this stage, at national level, calls into question objectivity, operating in the national interest and plain common-sense and fairness.

## Appendix B

**Map 1: Manston Airport & Ramsgate (close up)**



Showing the detail of densely populated Ramsgate (and even then, broadly limited to just its CT11 zone boundary – so excludes its CT12 homes, and its Harbour with on board-sleeping visitors). In terms of how low planes are, it's barely over 2 flight-line miles distance from the runway end to the coast edge, with Ramsgate in-between.

[The 'inner red zone' marked on Ramsgate broadly denotes the area of homes with (the standard Air Industry method of measure) being at least '48 decibel average night noise'. But that 'average noise' doesn't exist / is never heard: the reality is either silence or roar. The noise-level & spread when a 747-400 takes off, affects homes way beyond the zone marked on the Map. And comparisons of night noise levels from other Airports can be 'chalk & cheese'. At a number, there are stricter limitations than Manston on the QC noise size of planes allowed at certain times at

night (often concerning 747 take offs). The BAP Appendix Table detail on that issue is incomplete (so misleading) in some cases, as explained in another point in the main letter). Even the same 'average noise score' isn't directly & fairly comparable between Airports. Ramsgate's marked 'red zone' is calculated from 'loud booms' at very low height (but 'reduced' by the amount of silence in-between flights). Some homes falling within Stansted's 'same 48 average night noise zone' for example, are sited 'off Map' being over 5 miles further away from the runway than any in Ramsgate, so the planes will be significantly higher over that home. The same end 'score' might be resulting from flights being much less noisy, but more often. The noise experience in the two places aren't directly comparable, whatever the figures suggest. ]