

**From:** [REDACTED]  
**Subject:** Manston Airport redetermination: defamatory potential submission [BDB-BDB1.FID9947610]  
**Date:** 18 November 2021 16:36:27  
**Attachments:** [image001.png](#)  
[NNF26November 2021.docx](#)

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Hi Naomi

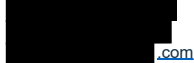
We have been made aware that campaign group 'No Night Flights' are intending to submit the attached as part of their second consultation response. We consider this anonymous document to be a highly unpleasant personal attack that is defamatory (see e.g. 5.3 'falsifying'), which has no place in the proper consideration of this or any project, and would urge you not to publish it if it is submitted. Our clients will consider taking legal action if it is put in the public domain.

Regards



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Angus Walker Partner



For and on behalf of BDB Pitmans LLP  
One Bartholomew Close, London EC1A 7BL

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