

**From:** [REDACTED]  
**Subject:** RE: Manston Airport redetermination: defamatory potential submission [BDB-BDB1.FID9947610]  
**Date:** 12 January 2022 13:04:59  
**Attachments:** image001.png

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Dear Naomi

Thank you for your response and happy new year!

We note the reference to the Planning Inspectorate's customer privacy notice and that it explicitly states that any "potentially libellous" content is required to be redacted.

We would also like to bring to your attention that in relation to planning applications, local authorities are advised, in the latest [Planning and GDPR guidance](#) (22 June 2021), to "not spend their time redacting or summarising this type of comment and should instead refuse to publish or even accept" inappropriate responses which are "defamatory, inappropriate or just rude". We consider that a similar approach of non-publication is suitable here as the NNF submission in its entirety is an inappropriate, personal attack and, at the very least, is "potentially libellous". Due to the extent of the required redaction, we do not consider a published, redacted version of the document to be meaningful to Interested Parties.

As previously mentioned, if this submission were to be published as it stood, Dr Dixon would consider bringing legal proceedings against both the writer and publisher of the libellous content.

We appreciate your duty to transparency in the decision-making process and if the DfT considers it appropriate, the Applicant would be amenable to the DfT requiring NNF to re-submit their submission to remove the lengthy personal attack on one of the Applicant's consultants.

Kind 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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**From:** TRANSPORTINFRASTRUCTURE <TRANSPORTINFRASTRUCTURE@dft.gov.uk>  
**Sent:** 20 December 2021 11:52  
**To:** WALKER [REDACTED] >  
**Cc:** THARUMAKUNARAJAH Aranya [REDACTED] >  
**Subject:** RE: Manston Airport redetermination: defamatory potential submission [BDB-BDB1.FID9947610]

Dear Mr Walker,

Thank you for your email of 18 November 2021 and correspondence dated 29 September 2021. Please find attached the Transport Infrastructure Planning Unit's response.

Kind regards,  
Naomi Williams

DfT logo green



**Transport Infrastructure Planning Unit**  
**Great Minster House**  
**33 Horseferry Road**  
**London**  
**SW1P 4DR**

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**From:** WALKER Angus <[REDACTED]>  
**Sent:** 18 November 2021 16:26  
**To:** Naomi Williams [REDACTED] >  
**Cc:** THARUMAKUNARAJAH Aranya <[REDACTED]>  
**Subject:** Manston Airport redetermination: defamatory potential submission [BDB-BDB1.FID9947610]

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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