

Cllr Chris Wells
Leader

And

Ms Madeline Homer
Chief Executive

Thanet District Council



10th April 2017

Dear Cllr Wells and Ms Homer,

We write on behalf of residents in Thanet and East Kent who are concerned about the negative impact on residents of potential aviation activities at a re-opened Manston Airport. We welcome the Council's conclusion last year that a cargo airport at Manston would not be viable. We appreciate the diligence and maturity shown in coming to this view, especially as this required that the Council's acceptance that it was not possible to follow through on a manifesto aspiration.

It would be good for the District and for East Kent if we could move on from the legacy of a failed commercial airport and look at ways to make the former airport site work as a real asset to Thanet and its residents. We recognise that the Council is trying to do this through the mechanism of the Local Plan.

Sadly, as you know, the idea of a 24/7 cargo airport is being kept alive by both local MPs and a vocal handful of airport supporters, the vast majority of whom live nowhere near the airport. They are supported by the claim of RiverOak Strategic Partners (RSP) that this new, off-the-shelf, company will at some point apply for a Development Consent Order to enable it to develop a cargo airport at Manston. This means that the threat to local residents of significant noise and air pollution, and the resulting degradation in quality of life and in local human health and educational attainment, is once more on the cards.

In its Draft Statement of Community Consultation (SoCC), published in February 2017, RSP stated that it proposes to re-open Manston Airport, primarily as a cargo airport handling at least 10,000 air freight movements per year. We heard more recently at the Public Inquiry into Stone Hill Park's Change of Use appeals that RSP plans many, many more air freight movements than that, citing 17,000 cargo flights a year as a target.

In the Draft SoCC section 5.1, RSP says that it will promote its pre-application statutory consultation in a number of different ways, including sending its Consultation Leaflet to all residential and business addresses within a boundary that includes those who either live within one kilometre of the airport, or one kilometre of those who may be significantly affected by noise, extended in some places to logical boundaries such as main roads.

Draft SoCC Appendix 2 contains a map of this area. This map makes it clear that RSP believes that noise and other pollution will only be a significant factor over a very small area. We take this to mean that RSP intends not to contact those people who we know will be affected by noise should a cargo airport reopen at Manston. We also take it to mean that RSP is hoping to claim that few local residents will be affected by plane noise and therefore few would be eligible for compensation and/or noise mitigation measures should a new cargo airport be developed on the Manston site.

The RSP suggestion that few residents would be affected by noise pollution is, of course, entirely contrary to the actual experience of local residents during the years in which the airport was open. TDC will remember Ramsgate residents (and others) packing meetings at Chatham House School to complain about the blight on their lives created by the airport's activities. Residents spoke of their anger and desperation at the effect aviation had on their quality of life. It is important to remember that this reaction was provoked by an annual average of just 500 freight arrivals and departures at the old airport compared to the 10,000 to 17,000 freight flights projected by RSP.

RSP's suggestion that few residents will be affected by noise is also in contradiction to the wealth of factual material available to TDC which sets out the real noise nuisance impact of an operational airport on residents. The reports commissioned by TDC from Bureau Veritas in 2010 and Parsons Brinkerhoff in 2012 to assess how many residents would be affected by noise if night flights were to be introduced make it clear that noise nuisance is not confined to a small area within 1km of the airport. Indeed, Bureau Veritas predicted that the population within the 85 dB(A) SEL contour affected by a flight departure to the east would be: *"up to 30903 [people] for the Boeing 747-400."*

RSP is also ignoring the noise nuisance map produced by No Night Flights which shows clearly that actual noise nuisance from planes using the old airport spreads all the way from the coast at Ramsgate though Herne Bay town and also to either side of the flight path.

Similarly, the RSP Scoping Report ignores the decibel levels recorded by various noise monitors while the airport was open which were reported to the regular meetings of the Manston Airport Consultative Committee (MACC) and to its later incarnation, the Kent International Consultative Committee (KIACC). Despite the rather patchy coverage of the physical monitors, noise levels of 80 to 85 Avg LMax dB(A) were regularly reported at Chapel Place, as were SEL noise levels of over 100 dB.

We do understand that RSP is hoping to use a measure of noise that averages noise out over a period. However, the Council knows, as do we, that residents complained regularly of the noise nuisance that they suffered when the airport had just a few hundred cargo flights a year, simply because each large and noisy plane flying low over residential areas causes noise nuisance whether or not the average noise over an eighteen hour day reaches the level suggested as relevant by RSP. RSP needs to pay attention to SEL as a measure of noise as well.

We can see that RSP is seeking to limit the number of people that it will have to reach out to directly in its statutory consultation. We suspect that RSP is seeking to limit the number of people that will give negative feedback about the possibility of a re-introduction of aviation noise pollution to their days and nights.

We also suspect that RSP is seeking to limit the number of residents that it will have to consider for proper compensation should a DCO be awarded. However, TDC has an obligation to its residents to protect their interests by ensuring that those most likely to be affected are properly informed of RSP's plans and the likely impact on residents' lives, and that they have every chance to take part in any statutory consultation.

We urge TDC to ensure that RSP extends its consultation activities so that it communicates directly with all those living, working and studying under and around the flight path and with those in all areas from which there have been complaints about past commercial operations at Manston and/or areas in which there have been high recorded noise levels. This is especially important as it seems abundantly clear that, to have any chance of success, any new cargo operation at Manston will require night flights. In 2015, East Midlands had 20,500 cargo flights. 12,000 of these were night flights, i.e. flights taking place between 2300 and 0700 hours. Cargo flights account for 59% of the flights at East Midlands made by cargo planes. The air cargo market is heavily dependent on night flights. In the past, both Wiggins and Infratil applied for permission to have scheduled night flights at Manston. Infratil applied twice saying that it could not attract cargo operators to Manston without being able to offer night flights. It is clear that a new cargo airport operator at Manston will want scheduled night flights.

At a minimum, RSP should write to every household under the flight path. The official flight path is a mile wide. It allows for a ten mile approach to the airport in either direction (we do appreciate that part of this approach for arrivals from and departures to the east is over sea). This means that, at a minimum, RSP should write to all households within half a mile of the centreline for the flight path, for up to ten miles to the west and to the full extent of the land in the east. As part of this communication, RSP must set out how many flights it intends to handle a year; what kind of planes it will be using; and what hour of day or night it envisages planes taking off and landing. The Planning Inspectorate has already confirmed to No Night Flights that this would count as "preliminary environmental information."

Clearly, the minimum direct communication area that we are advocating would extend beyond TDC's boundary and into Canterbury City Council's area. This is simply a necessary reflection of the facts on the ground (quite literally). Unless all those who would be significantly affected by the proposals are made aware of the consultation, any consultation will be worthless. In any event, we understand that there is an expectation of "cross-border" co-operation and consultation between local authorities when dealing with strategic or large scale issues, such as RSP's proposals.

Please can you confirm that TDC will be doing its part to insist that RSP takes its pre-application statutory consultation seriously? We cannot see how RSP will be able to claim that it has done so if it does not tell people who will be affected by airport operations that a cargo airport might be developed on that site. In our experience, most local people think that the airport is dead and buried. They have no idea that a brand new company wants to create the UK's busiest cargo airport in their neighbourhood.

If there is any help that No Night Flights can give you in providing additional information, please do let us know. Our group archive is extensive and some of our members have been involved with airport issues since before Manston was opened as a commercial airport. We go back a long way and have a high regard for factual debate.

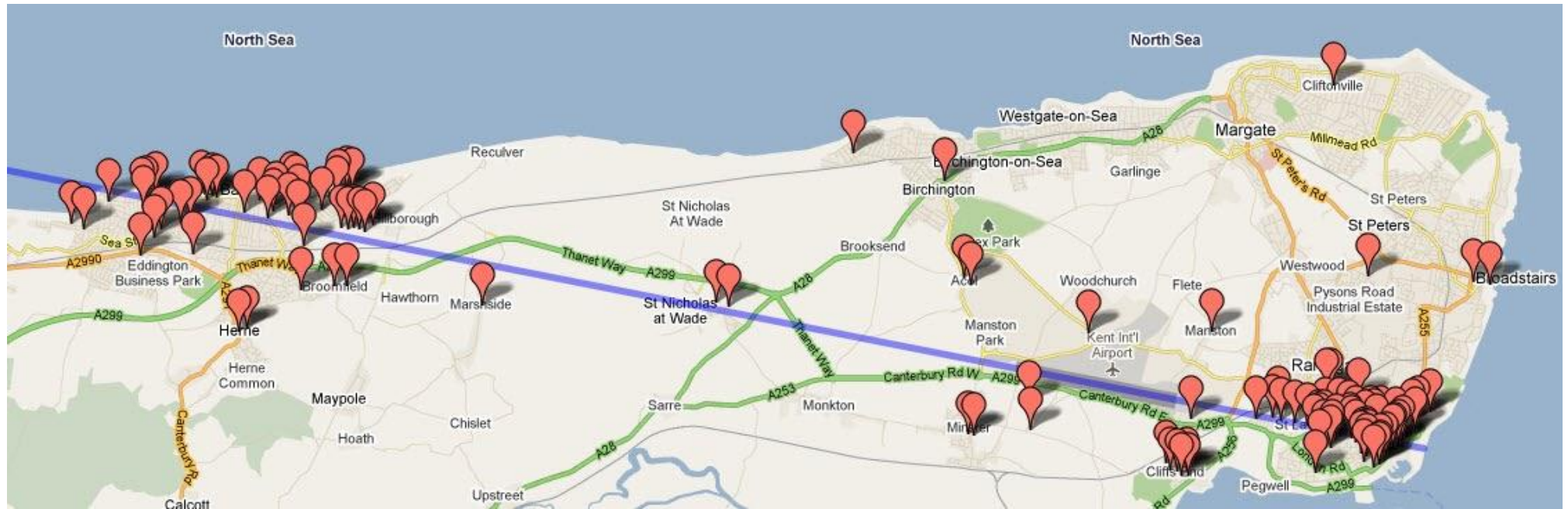
Finally, we would like to note that while we have concentrated on the noise issue in this letter, we are equally concerned about airborne pollution, which arguably affects a greater proportion of the local population. And, while aviation has a good safety record, those accidents that do happen are frequently catastrophic, especially when they involve highly populated areas such as Ramsgate.

With kind regards from a sample of No Night Flight supporters, the vast majority of whom live under the flight path,

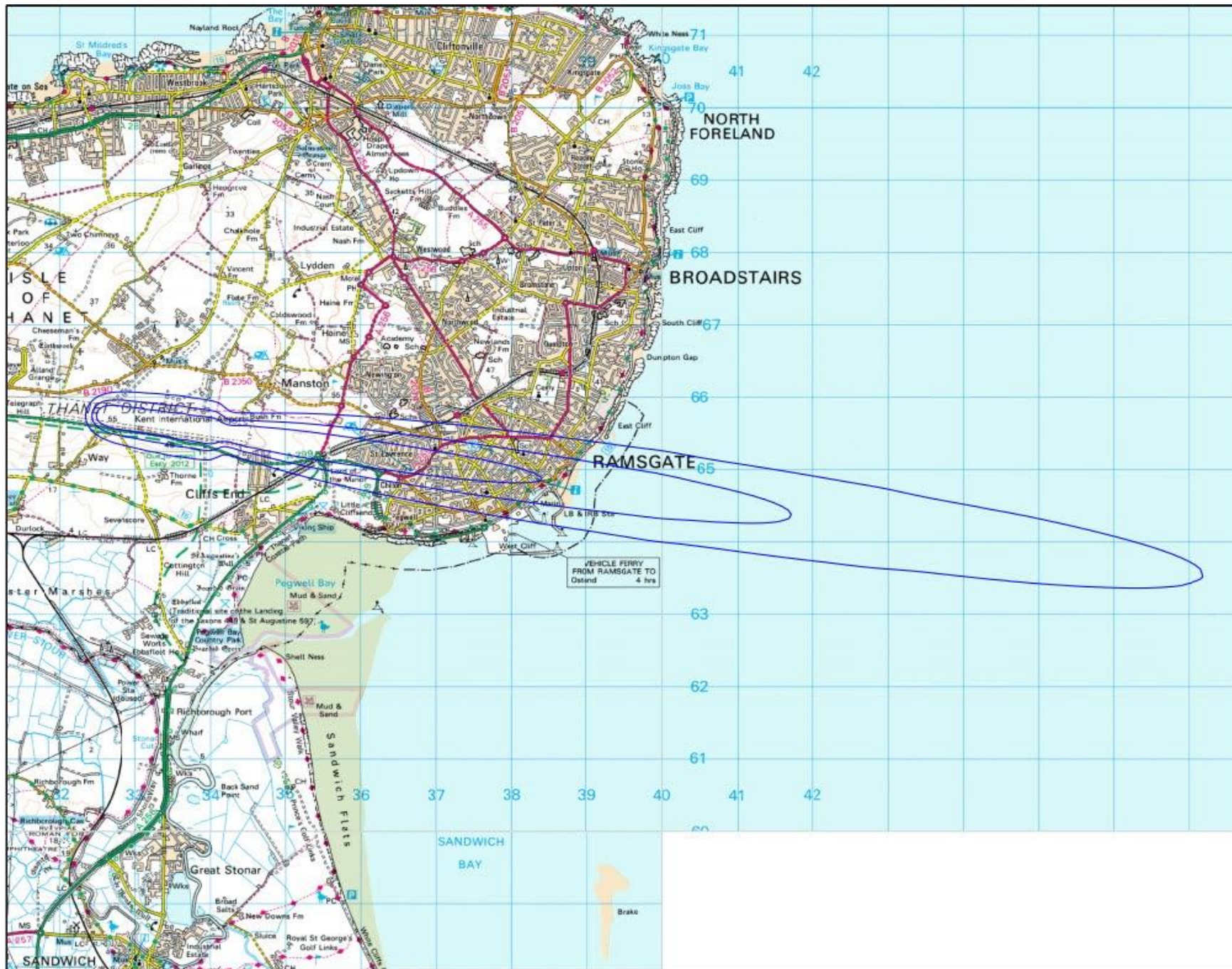
Jacqui Ansell – Ramsgate
Margot Bandola – Ramsgate
Mark Bandola – Ramsgate
Chris Barton - Cliffsend
Ronald Blay – Ramsgate
Rita Burns – Ramsgate
James Chappell – Ramsgate
Diane Cleak – Ramsgate
Paul Cliffe - Ramsgate
Jim Counter – Ramsgate
Gillian Crow – Ramsgate
Simon Crow – Ramsgate
Paul Dawkins – Deal
Kim Edgington - Ramsgate
Jon Fowler – Herne Bay
Sophie Fowler – Herne Bay
Ineke Frencken - Ramsgate
Anthony Fuller - Birchington
Davena Green – Ramsgate
David Green - Ramsgate
Shirley Green - Ramsgate
Stan Green - Ramsgate
Matthew Griffiths – Ramsgate
Jane Hetherington – Ramsgate
Andy Hollins - Ramsgate
John Hollins - Ramsgate
Nikke Hollins - Ramsgate
Faye House – Herne Bay

Sam Hudson – Herne Bay
Kit Jolly - Ramsgate
Susan Kennedy – Ramsgate
Malcolm Kirkaldie - Ramsgate
John Lake - Ramsgate
Col Longmore – Ramsgate
Magaret Mabey - Ramsgate
Ros McIntyre – Herne Bay
Alexander Melman – Ramsgate
Margarita Moscosco - Ramsgate
Anne-Marie Nixey – Ramsgate
Angus O'Hara – Ramsgate
Martin O'Hara – Ramsgate
Sam O'Hara - Ramsgate
Aaron Oldale – Ramsgate
Keith Owen - Ramsgate
Graham Packman - Ramsgate
Janet Packman - Ramsgate
Veronica Pratt - Ramsgate
Marva Rees – Ramsgate
Phil Rose – Herne Bay
Judith Turton - Ramsgate
John Walker – Chairman, Ramsgate
Society
Alan Welcome – Broadstairs
Lee Woolcott – Ramsgate
Mandy Woolcott – Ramsgate
Estelle Worth - Ramsgate

No Night Flights data – a sample of residents who have copied to us complaints about aviation noise associated with the operation of Manston Airport



The “noise contour” maps on the following pages are taken from the Bickerdike Allen Partners report of August 2010. We have shown only those maps from their report that calculate the impact to the east of the airport.



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Legend

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Drawing Title
LONDON MANSTON AIRPORT

Boeing 747-400
85, 90 and 95 dB(A) SEL Noise
Footprints

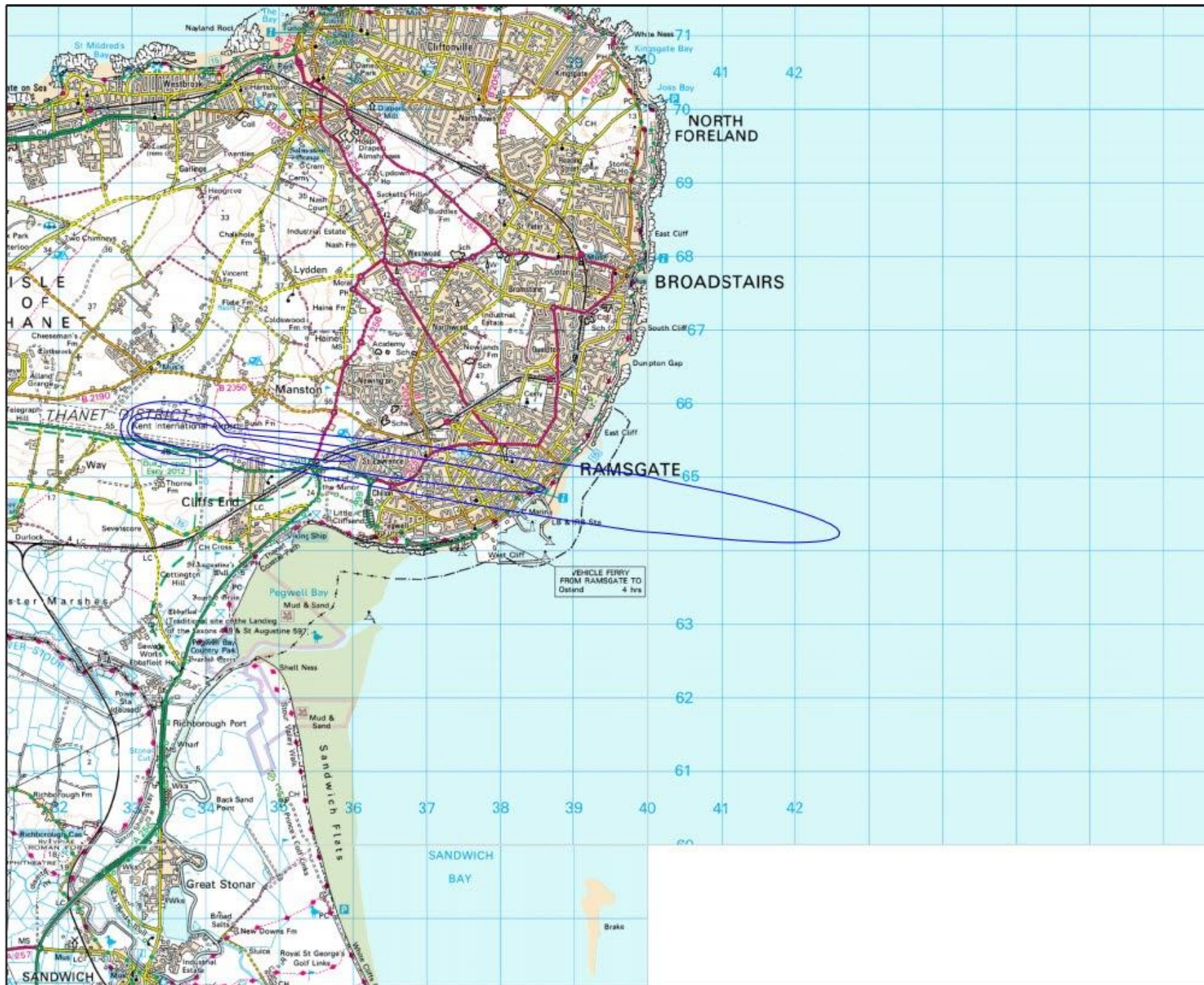
Approach Runway 28

Scale at A3
 1:50,000

Date: August 2010

Drawing Number

Figure-4.1



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Drawing Title
LONDON MANSTON AIRPORT

**McDonnell Douglas MD-11
 85, 90 and 95 dB(A) SEL Noise
 Footprints**

Approach Runway 28

Scale at A3
 1:50,000

Date: August 2010

Drawing Number

Figure-5.1



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Drawing Title
LONDON MANSTON AIRPORT

Boeing 747-400
85, 90 and 95 dB(A) SEL Noise
Footprints

Departure Runway 10

Scale at A3
 1:50,000

Date: August 2010

Drawing Number

Figure-4.4

RSP's intended direct communication zone

