

MANSTON DCO – REGISTER AS AN INTERESTED PARTY?

| | |
|--|---|
| YOUR RIGHTS | ✓ KNOW WHAT IS GOING ON |
| HELP SHAPE THE INSPECTOR'S APPROACH | ✓ HAVE YOUR SAY (WRITE AND SPEAK) |
| | ✓ COMMENT ON OTHER PEOPLE'S INPUTS |

1. Visit <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipcsection=overview> click on the tab for registering on line as an interested party
2. Your name¹.... who you are representing (“me/my family” is OK – don’t mention NNF if you definitely want to speak yourself).... explain your connection with the local area and how you are affected by the proposals....then give a brief summary of the main point(s) you want an Inspector to look into. Go for quality, not quantity. Limit is ideally 500 words. Be clear and objective, not shouty. Say what evidence supports you. Say why it matters to you. Keep to what RSP have actually said in their application (all documents are on the PINS site). You don’t need to use technical language.
3. The following points could be useful - choose a few points that most worry you and use your own words. This is about quality and personal knowledge, not quantity.
4. *Registering doesn’t commit you to speaking at public meetings. We can sort this out later. Registering simply gets you in the game and tells the Inspectors what you think. It helps the Inspectors decide what to explore with RSP in the examination phase. Registering is about influence.*

INDEX TO POINTS

- A. ECONOMIC VIABILITY/BENEFITS OF THE PROPOSED DEVELOPMENT
- B. FUNDING
- C. NOISE AND NIGHT FLIGHTS
- D. IMPACT ON PEOPLE’S HEALTH AND CLIMATE CHANGE
- E. SAFETY
- F. IMPACT ON RAMSGATE HERITAGE ASSETS AND RAMSGATE HERITAGE ACTION ZONE
- G. BIODIVERSITY
- H. TRAFFIC
- I. HERNE BAY ANNEX

¹ They will publish your name (though this can be kept out if you are a member of a group). They will keep your address confidential

A. ECONOMIC VIABILITY/BENEFITS OF THE PROPOSED DEVELOPMENT

Planning context

- No Government policy statement has said the UK needs a new freight airport. The Department for Transport does not predict any growth in the number of freight flights. Therefore, the application must establish a clear and compelling case of need in the national interest if it is to be granted a DCO. This it fails to do.

- RSP's proposals come at a heavy economic and environmental cost to Thanet District Council's future supply of housing sites. The redundant airport site of 720 - 800 acres forms the only large brownfield site with potential for housing development. It was included in the officers' recommended draft of the Local Plan with an allocation for housing and mixed use development - a strong recommendation overruled by a new Council in January 2018 on the misconceived rationale that this would give time for the DCO to proceed. One MP also commented that the decision to remove the site as a site for housing would ensure the value of the site did not become unaffordable for RSP!

Below are initial representations that the economic case does not stand up and cannot therefore outweigh the economic and environmental harm the development will undoubtedly cause:

1. Unsatisfactory and inadequate evidence of business case

- No financial business case is presented to judge the strength of the commercial proposition (i.e. with detailed financial justifications and including cash flow, profit and loss, and investment predictions).
- Central and crucial forecasts of air freight, market demand, job creation, etc all rest on work by a former close colleague of one of RSP's principal directors, lacking independence and experience.
- Those predictions and conclusions (in the Azimuth reports) ignore market trends to belly-hold freight (and reasons for the shift) and lack credible supporting evidence. They require very careful scrutiny.
- 4 independent and expert aviation opinions² disagree that Manston can be viable and 3 directly challenge the Azimuth findings (the first expert report predated Azimuth) e.g. "extremely optimistic, not credible or likely, with negligible supporting evidence." "Our overall conclusion is that the RSP proposals and the Azimuth forecasts are deeply flawed. The outlook put forward by RSP / Azimuth does not reflect market realities. We would expect freight tonnage and freight ATM outturn at a reopened Manston to be considerably below the Azimuth forecasts." "A work of assertion rather than evidence of systematic analysis of the potential market". One (York Aviation) complained that Azimuth had misrepresented York Aviation's data and findings.

2. Manston's history as a freight airport

- 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 forecasts to 2050 assume the number of freighter flights in the UK will remain flat at 2016 levels. The market has halved and Manston failed when there was twice as much business to go for. There is no evidence the market is going to grow or requires a new freight airport.
- In a falling market for cargo ATMs, every ATM lured to Manston would have to be won from another UK airport. So, any jobs created at Manston will be at the cost of jobs at another UK air or sea port. They also come at the cost of Thanet's current heritage-dependent³ approach to local regeneration [see section E below plus new separate section, under "development"]
- The evidence shows that there is sufficient existing and planned capacity to deal with growth in air freight at existing UK airports. Azimuth claims there is a pent up demand for air freight to come into the UK. They say it now comes in by truck because the freight airports are full. This ignores the considerable spare freight capacity at East Midlands and at Stansted Airports, as well as at a host of other operational UK airports. It also ignores the fact that the majority of the air freight market is long haul, and increasingly so, and that for domestic and short haul destinations in Europe it is often cheaper, faster and more flexible to truck freight to its destination. Freight operators choose to truck freight short distance. They're not doing it because there is no flight option. If additional air freight capacity was ever required, Manston is in the wrong place, located at the end of a peninsula.
- Successive expert reports, plus analysis of the current and future UK air freight sector, say it is unlikely that Manston could ever become a commercially viable operation. A fourth failed attempt with the same strategy to run Manston as a freight airport would prevent plans for the site which offer serious and sustainable regeneration and job creation in Thanet. [ca. 700 words]

² See reports by Falcon Consultancy, Avia Solutions, York Aviation and Altitude Aviation Advisory.

³ Viz: Heritage Action Zone designation

B. FUNDING

Planning context

- The application carries a high level of risk and uncertainty. It is a commercial operation that needs substantial infrastructure investment to function. If it fails, the site is devalued - witness the previous sell-off of the site for £1. Yet the potential commercial operation is highly sensitive to and predicated on strongly disputed forecasts of dedicated air cargo demand, and market share - forecasts that appear to have been dismissed by every specialist aviation consultancy firm that has considered them⁴.
- There is no business plan by which to gauge the strength of the commercial operation. There will be very high start-up costs coupled with any potential returns being very long term. This increases the need to probe the scale, origin, reliability and sustainability of funding sources over the short, medium and long term especially given the high level risk that potential investors would perceive given Manston's dismal track record and poor location.
- This DCO is objectionable in that RSP owns none of the necessary land and cannot show it has the hundreds of millions necessary to bring this project to fruition. The application looks like an attempt to use Government powers to permit a highly speculative adventure by a shadowy offshore company with no substance or track record of operating a successful freight airport. That is contrary to basic property rights.
- PINS have said that the Funding Statement does not comply with guidance and needs to be rectified early in the Examination. The examination should not proceed without the applicant demonstrating that they have access to sufficient funding to acquire the land should they be successful.

Here are some initial representations that the sums do not add up for this application:

1. Costs underestimated

The price put forward to acquire the site via a CPO (£7.5m) massively underestimates the value of that brownfield site. RSP claims this reflects qualified advice but the estimate is wildly inconsistent with the 1961 Land Compensation Act, which requires an 'open market' basis for valuation - taking full account of potential use of the land acquired (e.g. mixed residential and other alternative uses, and the ability of the land owners to do a similar scheme to RSP's).

- The estimate for noise mitigation measures (£5.6m) appears infected by the flawed noise contours [see noise briefing below]. It should be much higher.
- Allowance should be made, as a minimum, for compensation to the communities that RSP admits will suffer permanent adverse effects (LOAEL) from their proposal
- The estimate for blight claims (£500,000) seems unduly optimistic.

2. Unsatisfactory information on investors and directors

- The information on the investors is so limited that no comfort can be derived regarding the ability to access the £15m claimed, let alone a realistic figure. No evidence of funding the development has been provided.
- The principal RSP Directors have been seeking compulsory purchase of Manston since early 2014. They were rejected twice by a Labour and then a UKIP administration at TDC as potential indemnity partners in a CPO process due to their failure to demonstrate financial credibility. They have failed consistently to demonstrate that they can raise the necessary funds.
- The applicant directors have no track record in this sector, except failure, serial insolvency and other issues. The representations regarding the ability to raise finance must be tested using a fully prepared investment appraisal and details of the investors.
- The application states "RSP anticipates that it will raise further equity and debt finance following the making of the DCO in order to develop the authorised development" but this makes this DCO akin to a landgrab⁵ and overlooks the damage done to the property rights of the land owner and local residents whose interests will suffer as a result of this speculative adventure. **[ca 600 words]**

⁴ Notably Falcon Consultancy, Avia Solutions, York Aviation and Altitude Aviation Advisory

⁵ See especially the Applicant's plans to include the so-called Northern Grass within the DCO footprint, which the applicant himself concedes is not required as part of a functioning airport. Though the applicant says his interests are strictly confined to aviation, previous speculative inquiry by one of RSP's principal Directors indicates the need for careful examination.

C. NOISE AND NIGHT FLIGHTS

Planning Context

- The Government's 2018 National Policy Statement on airport capacity in the South East states that any proposals for airport expansion should be judged on their individual merits, including potential negative effects. Noise levels are highlighted as a particular concern, requiring examination⁶.

Some initial representations that the applicant has presented estimates that underestimate the potential negative effects of noise from his proposed development, and has disguised his true intentions on night flights:

1. No caps on flight numbers

- The applicant states that the runway and 19 stands it proposes are capable of handling 83,000 freight Air Traffic Movements (ATMs) annually but bases its "worst case" noise assessments on its estimate that a figure of 17,170 ATMs is more likely. However, as RSP proposes no cap on the number of ATMs, 17,170 is not "worst case".
- Nor is any cap proposed on the number of night flights, only an overall noise quota of 3028 QC points a year. This would permit very extensive night flying, well over three times⁷ the "worst case" assumptions for night flights used in RSP's Environmental Assessment (based on 8 flights per night).

2. Dubious noise modelling and assumptions

- The applicant has paid insufficient attention to 'real time' official noise measurements from past airport operations⁸ at Manston and his noise contours over Ramsgate are impossible to reconcile with the noise contours presented by a previous operator in 2011, when applying for a much smaller operation⁹. They also appear contradicted by CAA noise measurement of the first 17 months of Boeing 787 operations at Heathrow Airport¹⁰, where no reading at 3.8km from the end of runway was less than 90 SEL dBA -how could noise levels over St Lawrence (1.6km distant) and central Ramsgate (3.2km distant) be much lower as RSP claims?
- Further evidence casting doubt on the applicant's noise predictions comes from independent noise experts engaged by the local authority in 2010 when a previous operator at Manston applied for a QC night budget of 1,995. The experts concluded "the populations predicted to be within the 85 dB(A) contour by such departures ranges from 14,722 [people] for MD11 departures, up to 30,903 for the Boeing 747-400."
- The applicant's baseline noise measurements are flawed and unsatisfactory and his noise modelling includes some questionable assumptions, e.g. it will secure runway choices that will reduce the historic aviation noise exposure of Ramsgate residents¹¹. That is not "worst case".
- The noise modelling also uses a technical standard (SONA 2014) intended for an airport already operating (which Manston cannot be without planning consents) rather than the DfT WebTAG standard¹².
- The applicant put forward a spurious metric for assessing significant effects of aircraft noise at night¹³.

3. Unclear intentions on Night flights

⁶ June 2018. See esp. paragraph 1.39: see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/714106/airports-nps-new-runway-capacity-and-infrastructure-at-airports-in-the-south-east-of-england-web-version.pdf

⁷ CAA data shows that at Luton 2,645 QC points translated into 7,450 night flights annually

⁸ Note that when Manston was operational, SEL readings from the noise monitor atop the Grammar school consistently recorded levels above 90dB. Data sets available – see also noise measurements considered by the then airport consultative committee – see

<https://drive.google.com/open?id=0B96caduedt5sYXlmRHdJLThuWFE>

⁹ See 2011 noise contours available on line at <http://hernebaymatters.squarespace.com/nonightflights-blog/manston-aircraft-noise-maps.html>

¹⁰ See CAA document CAP1191

¹¹ See footnote 1 to Table E3 in <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-002426-5.2-9%20-%20Environmental%20Statement%20-%20Volume%209%20-%202%20of%202%20-%20Appendix%209.1%20-%20Envirocheck%20Report%20-%20Part%202.pdf>

¹² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-002431-5.2-12%20-%20Environmental%20Statement%20-%20Volume%2012%20-%202%20of%202%20-%20Appendix%2010.1,%20Appendix%20B,%20Part%202.pdf>

¹³ This is the infamous "18 times a night" awakening metric described in Section 12.6 of Chapter 12 Noise and Vibration. Following repeated challenges, RSP claimed this value "has been informed by **emerging** [emphasis added] best practice and research into aircraft induced sleep disturbance, namely research undertaken by Basner et al (2006)". But as RSP had later to confess, the Basner work points to a figure of 14 not 18 – and it is unclear there is any academic consensus or official endorsement for the "18 times a night" assertion.

- Despite the applicant's insistence locally that he "neither wants nor needs" any night flights save emergency and humanitarian exceptions¹⁴ the veiled business logic of the application appears to favour capturing the bottom of the freight market viz. noisy night flights, witness:
 - proposal to accept night ATMs rated at QC4 - prohibited from the London airports on noise grounds¹⁵
 - failure to address disturbing impacts from noisier aircraft
 - asserting free night flights as the top reason operators would choose Manston above E Midlands Airport
 - his response to the public consultation comments favouring night flights repeatedly states that RSP "welcomes support for night flights"

As most of UK cargo flights are night flights it is especially important to be clear about what is a realistic worst case night flight scenario and about the human costs of that proposal. Other implications from night time freight handling do not appear adequately to have been addressed, e.g. light pollution.

4. Unrealistic approach to mitigating the noise problems caused

- The applicant's proposals for mitigating the noise they will create for individual residents show disregard for the noticeable and intrusive noise nuisance their development will create: they would offer just £4,000 towards sound insulation and only for people living where the applicant says people will experience over 63 decibels continuously, averaged over a 16 hour periods (55 decibels averaged over 8 hours if from a bedroom). Compare the applicant's thresholds with where the Government says "Noticeable and intrusive" noise occurs (LOAEL)¹⁶: 51 decibels (day) and 45 decibels (night)! [ca 900 wds]

¹⁴ See documentation already submitted to PINS regarding contemporary sound and other verbatim recordings of these claims

¹⁵ See Noise Mitigation Plan submitted with the DCO application

¹⁶ Official definition, says LOAL is where 'Noise can be heard and causes small changes in behaviour and/or attitude, e.g. turning up television; speaking more loudly, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance. Affects the acoustic character of the area such that there is a perceived change in the quality of life.'

Planning context

- The Government's 2018 National Policy Statement on airport capacity in the South East states that any proposals for airport expansion should be judged on their individual merits, including potential negative effects. Therefore, adverse effects on community health from air quality impacts need to be given full weight against claimed economic benefits of the proposed development.

Initial representations concern the human costs arising from negative health impacts from noise, particulate and NO2 pollution and greenhouse gas emissions:

1. Noise

- Aircraft noise significantly impairs health as study after study shows. A daytime average sound pressure level of 60dB increases risk of coronary heart disease by 61% in men and 80% in women. Significant health effects start at an average sound pressure level of 40dB. Noise events cause significant increase in blood pressure levels in both men and women. Aircraft noise significantly affects the risk of hypertension. There is increased risk of cardiovascular disease for those experiencing annual average daytime noise levels of 50dB and above. Researchers have found a statistically significant association between exposure to aircraft noise and risk of hospitalisation for cardiovascular disease, particularly among older people living near airports

2. Risk to children's developing abilities

- Children living under flights paths have been shown to have deficits in long-term memory and reading comprehension.

3 Particulate pollution

- Particular grounds for concern that particulate pollution from the proposed freight hub would seriously endanger the health and wellbeing of local communities in the surrounding towns and villages, including Minster, Manston, Margate and Ramsgate, and would exacerbate the UK's air pollution crisis in general.
- RSP says: "Concentrations of PM10 and PM2.5 [the tiny bits of various materials easily absorbed by human tissue] around the airport are low, and the airport will be a very small source of these pollutants." But there are insufficient data available to back up this claim. According to the Thanet District Council 2017 Air Quality Annual Status Report from June 2017, the Council does not currently undertake any monitoring of PM2.5, and consequently there are currently no measures in place to specifically address PM2.5 concentrations within the District. So references to it being within limits or not too severe in relation to the proposal at hand are unfounded. PM10 is only being measured at two sites in Thanet, Birchington and Ramsgate, and while they are currently under annual mean limits, both have been on the rise since 2014. In addition, the capture rate in Ramsgate is only 83% so the level of pollution could, in fact, be higher.

4. NO2 pollution

- Contrary to RSP's claim that there is "scientific uncertainty about the health effects of NO2". NO2 pollution alone has been linked to the premature deaths of 23,500 people in the UK every year, with 90% of Britain's urban areas experiencing illegal levels of NO2 pollution since 2010. It is classified as a human carcinogen by the World Health Organisation and is linked to lung cancer, asthma, and cardiovascular illness. NO2 inflames the lining of the lungs and makes them more susceptible to illnesses such as bronchitis and asthma. Children are particularly vulnerable. If developing lungs are affected the damage is life-limiting.
- Road transport is estimated to be responsible for 60% of all NO2 emissions¹⁷. Consequently, it is not credible in the slightest that the additional contribution to air pollution from the proposed development, including considerable airport-related HGV traffic, will be "small", "slight", "moderate" or even "negligible". To the contrary, these plans would counteract urgent plans to tackle the current air quality problems in the UK. It should be taken into account that Thanet's population is older than average and therefore likely to be disproportionately affected by increased air pollution.

5. Greenhouse gases

- Proposals to reduce greenhouse gases are weak, often beyond the applicant's control and, by their own admission, only affect a tiny percentage of the emissions. He overlooks the fact that cargo planes are usually

¹⁷ European Commission, 2016, Transport Emissions: Air pollutants from road transport <http://ec.europa.eu/environment/air/transport/road.htm>

older and more polluting than passenger planes and takes insufficient account of the huge increase in heavy goods vehicles on the roads he will cause across Thanet and beyond. The applicant's claim that "there are no significant effects for greenhouse gas emissions from the Proposed Development on the climate" is repugnant to reason. The development would plainly lead to significant increases in carbon emissions and contribute to climate change. This is not to be taken discounted in Kent, where sea-level rise already threatens homes, farmland, and sites of international nature conservation importance. **[ca 800 words]**

E. PUBLIC SAFETY

Planning context

- The applicant's proposed 10,000-17,100 flights p.a. are below the 18,000 ATM threshold for requiring Public Safety Zones (PSZ). However, the applicant says that the new airport will have a capacity of 83,000 ATMs. Comparably sized UK airports show best practice by having PSZs. The RSP proposal contains no mention of these, nor any analysis of the 1: 10,000 or 1: 100,000 risk contours.

- Manston operated under a Certificate of Lawfulness granted because it had civilian flights during its time as an MOD property. A proper risk analysis would conclude that Manston should not be given planning permission as an airport let alone a DCO. Given the proximity of Ramsgate (population 40,000), the number of schools under the flight path, the height of the aircraft over the town, the nature of cargo aircraft, the lack of a local major A&E centre and past history at the airport, the Major Accidents and Disaster Assessment and Mitigation Plan (TR020002/APP/5.2-3) delivered by RSP fails to address risk factors adequately.

The following are initial representations that the applicant has not done enough to consider public safety:

1. Lessons from experience

- At its peak in 2009, Manston handled 30,000 tonnes of cargo a year with only 435 flights and yet we had a number of potentially fatal incidents that could have resulted in major loss of life. With 10,000 flights, the risks increase dramatically.
- The applicant proposes that 70% of its take-offs will be over Ramsgate. Cargo aircraft are usually older aircraft, often from countries where safety standards are poor. Previous Manston customers include MK Airlines, Meridian and KAM Air, all now banned from UK air space.
- In August 2010, a KAM Air plane "struck its tail on the runway and the grass surface beyond the runway before becoming airborne during take-off from Manston Airport (United Kingdom). Investigations of this serious incident by the United Kingdom concluded that there were serious deficiencies with the operational control of the DC8 fleet of Kam Air." (para 14, COMMISSION REGULATION (EU) No 1071/2010). The Manston Green development of 785 homes is 500m from the end of the runway and directly under the flight path. It has outline planning permission and this year, was awarded £2.5 million from the Housing Infrastructure Fund. Any similar incident could result in major loss of life at Manston Green and/or the Cliffsend homes 250m to the side.
- In 2012, in a vortex incident in Southwood Gardens (2.5km to runway) created as a plane went over, the entire roof fell into a neighbour's garden narrowly missing her. If this had happened at nearby Chilton Primary School during playtime, there would have been significant loss of life.
- Ramsgate is not 4km from the runway as RSP contends. Currently, the built-up area begins 1.3km from the runway and directly under the flightpath. It is 4km across Ramsgate from the Marina to the runway. The town is atop two cliffs. There are 3 schools directly under the flight path.
- "In approximate terms the aircraft will finally descent (sic) at 52m for each kilometre travelled, such that at the Marina, aircraft would be 235m above the aerodrome level (54m), or 289m above sea level." (p14, London Manston Airport, Aircraft Noise Assessment and Mitigation Report, June 2003)

| School | Number of Pupils | Distance from Runway | Height of Aircraft |
|------------------------------|------------------|----------------------|--------------------|
| Chilton Primary School | 422 | 1.8km | 150m (land dips) |
| Christ Church Primary School | 253 | 2.75km | 185m |
| Chatham & Clarendon Grammar | 1372 | 3.5km | 209m |

When Manston was operational, SEL readings from the noise monitor atop the Grammar school consistently recorded levels above 90dB. 10,000 aircraft would cause hearing loss and make teaching impossible. (Data sets available).

80,000 ATMs?

- Total cargo flights at all London airports in 2017 was only 14,588. Manston seems too far from London to capture 68.5% of this market. York Aviation, Falcon Consultancy, Avia Solutions and Kent County Council have all published reports stating Manston will never succeed as an airport. The Davies Commission found no role for it. The applicant's talk of even a theoretical capacity of 83,000 ATMs appears to be absurd but if RSP consider that anything over 20,000 ATMs is even a remote possibility then they were required to include PSZs in their application. [ca 650 words]

Planning context

-Ramsgate has around 450 listed sites and buildings and four conservation areas (Pegwell, Montefiore, Royal Esplanade and Central Harbour). In 2017, we became one of Historic England's first Heritage Action Zones (HAZ), alongside cities like Coventry and Hull. There are now 18 Heritage Action Zones but Ramsgate is still the only HAZ in the South East Region. The HAZ is a 5-year programme covering the whole of Ramsgate. Its aim is to use the town's heritage assets to achieve sustainable economic growth. As part of this programme Historic England has carried out a series of surveys¹⁸ (not recognised in the developer's application).

- Here are initial representations that the applicant's case fails generally to recognise the quality and significance of Ramsgate's heritage assets - and understates the impact of the development upon them.

1. Unsatisfactory measurement of impact

- Limited assessment of the impact of proposed operations, reflecting applicant's questionable decision to 'scope out' any detailed environmental assessment beyond a kilometre of the airport perimeter, scoping out Ramsgate!
- Insufficient weight given to noise data from the airport's last operational use, reliance on modelling based on optimistic and questionable assumptions.
- Inadequate regard to Historic England guidance¹⁹ on calculating the effects of aviation on the historic environment (including for example the physical damage caused by noise and low frequency vibration, and the human response to noise).
- Failure to recognise key features of the area, e.g. that many of the most significant listed buildings are residential properties and located in Central Harbour ward, directly under the flight path.
- Failure to weigh the impact of disincentivising those whose time, energy and other resources are needed to conserve and sustain most local heritage assets.
- Failure to address the visual impact of the proposals on heritage assets such as Ramsgate Royal Harbour and on the reviving tourist industry, a major source of employment.

2. Flight paths

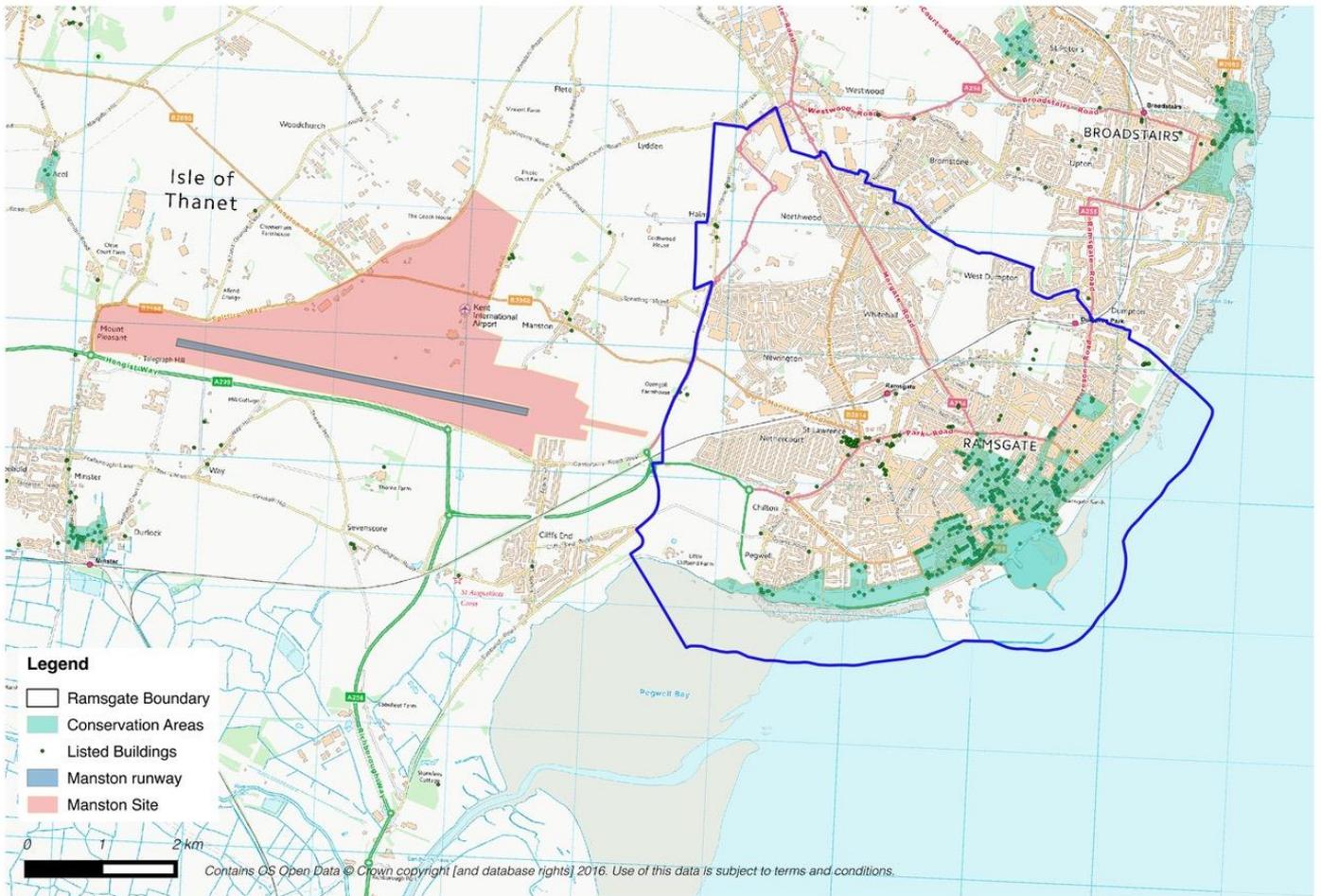
- Flight paths will be fundamental to understanding the level and extent of noise and visual disturbance to vulnerable communities and heritage assets. The applicant makes questionable assumptions that he will secure runway preferences that will reduce the historic aviation noise exposure of Ramsgate residents²⁰. This assumption, convenient for his noise contours, appears optimistic and in any event not "worst case".
- Official data from Manston's most recent operational period²¹ establishes beyond doubt that most of the town of Ramsgate is likely to experience sound levels in excess of 60dB SEL. Even if the operators prohibited older and noisier aircraft - to the contrary, RSP's Noise Mitigation Plan proposes to welcome old QC4 rated ATMs - the levels of ATMs they propose greatly exceed what was seen when noise levels in Ramsgate were recorded. Maximum sound impacts from aviation in Ramsgate were regularly recorded at over 100dB, plus many of adverse effects identified in the relevant guidance as requiring careful study.
- The close proximity to the proposed airport, its unavoidable location directly under the principal flight path, and the intensity of its 24-hour operation, puts Ramsgate at serious risk from the effects of noise, vibration, pollution and visual disturbance. Collectively these factors would combine to make Ramsgate a far less attractive town in which to live, work, and visit, adversely impacting on much needed regeneration.

¹⁸ <https://historicengland.org.uk/services-skills/heritage-action-zones/>

¹⁹ <https://research.historicengland.org.uk/Report.aspx?i=15740>

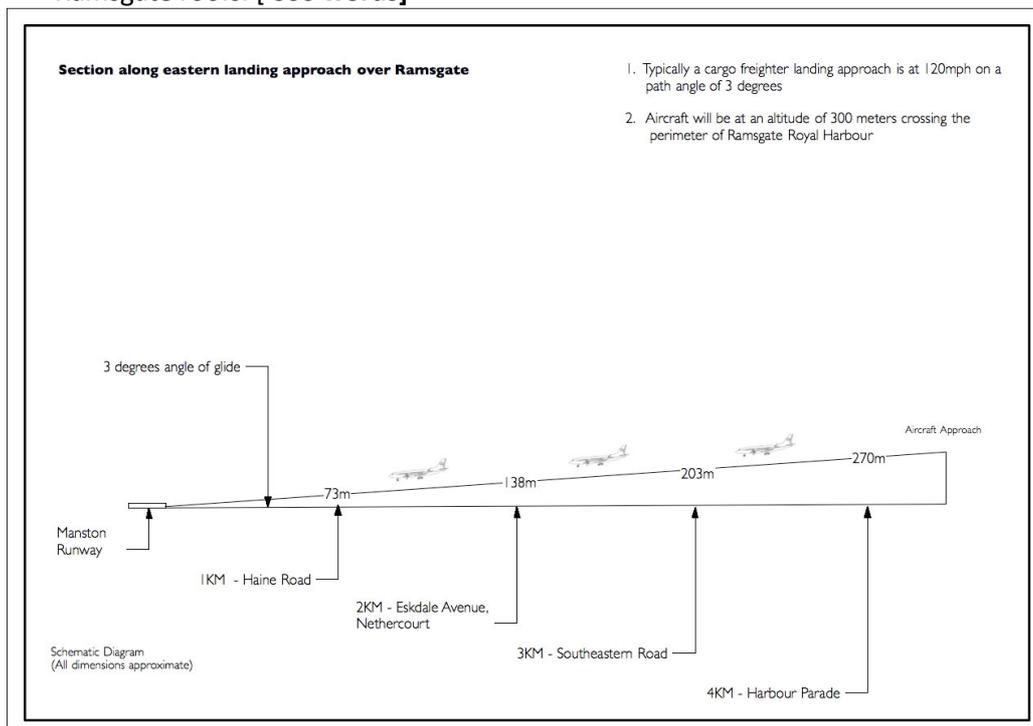
²⁰ See footnote 1 to Table E3 in <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-002426-5.2-9%20-%20Environmental%20Statement%20-%20Volume%209%20-%202%20of%20-%20Appendix%209.1%20-%20Envirocheck%20Report%20-%20Part%202.pdf>

²¹ See data presented in section C above



Landing Glide Path

- The application gives insufficient attention to the glide path on landing and the implications of the height of aircraft above various parts of the built-up area. This is a key factor in noise disturbance and in assessing the potential for physical damage to building fabric.
- Ramsgate is not 4km from the runway as the application wrongly states. Currently, the built-up area begins 1.3km from the runway and directly under the flightpath. It is 4km across Ramsgate from the Marina to the runway. The following diagram may actually underestimate how close descending jumbos will be to historic Ramsgate roofs. [600 words]



G. BIODIVERSITY?

Planning context

- The Thanet Coast, Sandwich Bay and Pegwell Bay complex is highly important for nature conservation and biodiversity. Due to its importance it has been protected under several UK, EU and International laws and conventions, as follows:

- a. Thanet Coast and Sandwich Bay Special Protection Area (SPA) – under the European Union Directive on the Conservation of Wild Birds, which requires member states to take appropriate steps to avoid pollution or the deterioration of habitats or any disturbance affecting the birds
 - b. Thanet Coast and Sandwich Bay Ramsar site – a wetland site of international importance as a waterfowl habitat under the RAMSAR Convention, which requires the conservation of wetlands designated sites
 - c. Thanet Coast Special Area of Conservation (SAC) – special area of conservation under the EU Habitats Directive
 - d. Sandwich Bay Special Area of Conservation (SAC) – see above
 - e. Margate and Long Sands SAC – see above
 - f. Outer Thames Estuary marine SPA – see above
- The nationally designated sites are:
- g. Thanet Coast Marine Conservation Zone (MCZ)
 - h. Sandwich Bay and Hacklinge Marshes Site of Special Scientific Interest (SSSI)
 - i. Thanet Coast SSSI
 - j. Sandwich and Pegwell Bay National Nature Reserve (NNR)
 - k. A new Marine Conservation Zone at Goodwin Sands, put forward by DEFRA

-The applicant proposes to overfly a complex mosaic of habitats of great importance and vulnerability, especially known for its bird population, notably waders and wildfowl. There are over 30 nationally rare species of terrestrial and marine plants, 19 nationally rare and 149 nationally scarce invertebrate species. Breeding birds that use the SSSI include Ringed plover, Oystercatcher and Little tern *Sterna albifrons*, a species specially protected by law and listed on Schedule 1 of the Wildlife and Countryside Act 1981.

Here are some initial representations that insufficient consideration has been given both to direct impacts (e.g. increased noise levels, disturbance by aircraft, night noise, deposition of pollutants such as nitrogen oxides) and indirect impacts (e.g. cumulative effects, increased traffic impacts or the impacts of infrastructure development associated with the proposals).

1. Cumulative effects and impact on rare birds

- The applicant declares that “No significant inter-project cumulative effects are likely with regards to air quality, biodiversity, freshwater environment, historic environment, land quality, landscape, noise (construction period only), socio-economics, traffic and transport, health and wellbeing, climate change and major accidents and disasters.” However, cumulative impacts appear likely from for instance, extension of the existing Thanet Offshore Wind Farm (Thanet Extension), laying of cables by Vattenfall at Pegwell Reserve, Dover Harbour Board’s proposal to dredge parts of the Goodwin Sands.
- The report admits significant adverse effects are likely as a result of increased noise in the communities which are in the vicinity of the airport and flight paths (Ramsgate; Manston; St Nicolas at Wade; West Stourmouth; and Pegwell Bay), but still maintains that the proposal will not have a significant effect on the European designated sites for vulnerable wildlife that border on these communities. This is questionable.
- Of particular concern is the presence of wading birds, which are especially vulnerable to disturbance as they have limited periods to feed on the mudflats each day due to tides. The scientific research paper, “Exploring behavioural responses of shorebirds to impulsive noise²²” indicates that increasing levels of disturbance directly impact breeding and overwintering success of wading birds.
- Concern must be expressed for the airport site - with breeding bird species, such as the skylark and grey partridge, and the barn owl, whose nests RSP propose to relocate. Loss of habitat is identified as one of the top reasons why the UK's wildlife species are decreasing in number.

2. Pollution

- Drainage from the proposed development will be via an existing outfall pipe directly into the sea at Pegwell Bay. Whilst RSP have stated that pollutants, including hydrocarbons (oil and fuel) and de-icer will be removed in a

²² Wright et al in ‘Wildfowl’ 2010

'dirty pond' prior to discharge down to Pegwell Bay, there is no detail provided. As spillages could occur at any point on the hardstanding (aprons, taxiways & runway) it is unclear how they will ensure that rain falling onto the site which currently discharges directly into Pegwell Bay will be kept free from pollutants.

- Concerned about possible contamination of the aquifer, given the 'Likely Land Quality Effects' outlined in table 4.1 of the Non Technical Summary, particularly the decommissioning of existing tanks and infrastructure on the Jentex site and the construction of the proposed fuel farm. **[ca 700 words]**

Planning context

- The applicant's traffic modelling appears incomplete and it must be questionable whether it can be completed in time for examination.

Initial representations are that the applicant has not presented a credible answer to the road congestion and fuel supply situation.

1. Fuel tanker movements

- Manston Airport does not have hydrant fuelling system and is not connected to the CLH Pipeline System so has no secure supply of Jet A-1 fuel, the standard fuel for commercial aircraft.
- In the past Manston airport activities were on a relatively small scale, easily served by road tankers.
- With the new plans submitted by RSP for the total redevelopment of the airport (with a stated theoretical maximum number of 83,000 flight movements ATMs) annually and a planned target of 17,170 cargo ATMs) the safe supply of aviation fuel to the airport becomes an important issue for the community at large.
- RSP are proposing to move the fuel farm (disused) which is currently on the Northern Grass to the current Jentex site on Canterbury West Road in Cliffsend. It will be right at the edge of a residential area. This move will require permission from the Environment Agency.
- As a high percentage of the freight landing at the airport is predicted by the applicant to be long distance, Manston will be an important refuelling stop. 17,170 ATMs would require the delivery by road of at least 600,000 litres of fuel daily for aircraft of the popular Boeing 737 type. The 747 requires 183,000 litres. The 767-300 requires 90,770 litres, the Airbus A330-300 requires 97,000 litres. The fuel delivery figure could plausibly rise to 2,000,000 litres per day, **requiring 50 - 60 road tanker deliveries every 24 hours.**
- Should RSP increase their capacity closer to the 83,000 flight movements they claim they could handle, the impact on traffic volumes would rise correspondingly. Such traffic movements in a heavily built up and restricted road access area like Thanet would pose serious dangers to the local population and the environment as a whole.

2. Freight traffic movements to and from Manston Airport

- Thanet is served by only three main access roads, A28, A299 and the A256. Of these three only A253 and A299 access the airport directly.
- In the context of BREXIT, the Government has already informed us to be prepared for major disruption to traffic in East Kent, particularly around Dover. This disruption has no time limit and could stretch long into the future. It would be likely to affect most severely the A256 which could cease to function as a viable route out of Thanet, leaving the A299 as the only major access road to the airport.
- Is there an alternative or secondary route to access the airport planned? Has RSP taken steps to instigate and model special measures regarding the shipment of dangerous cargos like aviation fuel? If so will this route run through the village which one? Will they be using the B2050, B2190 road system?
- The existing road network around the airport is far from adequate at the present moment and has been designed to restrict traffic and impede HGV's. Though RSP do mention upgrading the roads it is unclear how and when this would be funded.
- 17,000 cargo ATMs per annum (approximately 46 ATMs every 24h) implies a payload ranging from 115 tonnes at the very lower end (Boeing 737-300 weight max. 2,250 kilos) to a high of 4,370 tonnes (Boeing 747F weight max. 95,250 kilos). As most air cargo arrives in passenger planes it is doubtful if the airport would be handling a steady flow of light shipments in the Boeing 737-300 class. Do we need this level of detail?
- Exclusive airfreight hubs exist to handle heavy goods shipments and therefore it is more than likely that the airport would be handling anywhere between 2,000 to 3,000 tonnes per day. I don't understand that point. This implies haulage of between 120 to 166 HGV's assuming of course that each freight shipper was leaving with a full load. As this is unlikely **the true figure for HGV activity in and out of Manston in any 24-hour period could be in the region of 400 to 500 HGV movements**, not including aviation fuel tankers.
- Such heavy road activity seems likely to entail significant environmental and health issues, along with the potential for major incidents. These issues are exacerbated by the fact that Thanet is surrounded on 3 sides by sea such that there is no realistic alternative to the limited existing road system. [ca 700 words]

You will have around 500 words to make your case. The following are examples of issues which may be of concern. You can use any of these – or you may have your own issues to raise. Nor do your comments need to focus only on Herne Bay. You do not need to write in technical language or use data.

If you do not wish to make an individual submission, your views can be represented by registering as a member of another organisation, such as No Night Flights.

a. PRE-APPLICATION CONSULTATION

I would like the Planning Inspector to consider whether the consultation adequately provided information to, and consulted the views of, the community of Herne Bay. The proposed flight path for Manston passes directly over Herne Bay from the extreme west to east – and the standard ½ mile variation from that line by aircraft takes in virtually the whole of the town, a population of 40,000.

INFORMATION: Considering the scale of the proposed cargo hub and the magnitude of impact communities, it is questionable whether RSP took sufficient steps to ensure the maximum number of residents were aware of the plans for Manston, or the consultation process, as follows:

- Notices in media relied on the public purchasing newspapers whose circulations are falling significantly.
- RSP claim in several parts of the submission that they sent postcards to every household under the flight path by mail; elsewhere they use the term ‘delivered’. These claims have been widely disputed by the residents of Herne Bay. The ‘delivery’ of postcards omitted whole streets and there is no evidence of any postcards having been posted to addresses in the town.
- As a result just 90 Herne Bay residents being identified in the RSP Consultation Report has having attended the consultation events – 0.225% of the population.
- In a letter following the consultation events the local authority for Herne Bay, Canterbury City Council, expressed “concerns regarding the adequacy of the consultation process”. (Doc 6.2 Consultation Report Appx46).

Further, at the Consultation Event held in Herne Bay, conflicting information was given to residents on many topics, including:

- proposed flight paths – statements including that aircraft would not pass over the town
- night flights – some RSP representatives stating there would be none and others stating that they would be inevitable.

b. NIGHT FLIGHTS

In view of the considerable impact on Herne Bay of night flights (restricted at other airports) I would like the Planning Inspector to establish the true proposals of RSP. Night flights are included in the application, yet RSP and its guest speakers (including a local MP) continue to deny in public that they will happen. Meanwhile the majority of UK cargo-specific flights are night flights and air cargo operations across Europe are heavily dependent upon them. The 17,100 cargo flights predicted for Manston would therefore suggest over 8500 night flights. Further, an overall noise quota of 3028 PC points per annum means that there could be many more night flights. However, RSP’s Environmental Assessment (table 9.1) bases its ‘worst case’ assumptions on only 8 flights per night (2920 per annum).

c. NOISE

I would like the Planning Inspector to assess how accurately RSP estimates the impact on Herne Bay of the proposals. RSPs noise impact assessments (2.4 Noise Mitigation Plan) are based on average noise, which it is now widely understood does not reflect the true impact on a community, especially that from frequent night flights. In a poll conducted in 2012 regarding proposed night flights at Manston, 181 Herne Bay residents responded, of whom 150 were against (83%), almost all citing noise/lack of sleep as the reason.

I am also concerned to read that RSP proposes to reverse the historic 30:70 split between the east and west ends of the runway (so that 70% and not 30% of flights pass over Herne Bay). This will have implications not

only for Herne Bay and Beltinge but also for the villages between Herne Bay and the airport such as St Nicholas and Minster, which is adjacent to the airport.

The three locations selected by RSP to establish current normal noise levels are all subject to higher than average levels of ambient noise (48-60dB daytime and 45-48dB night) and thus do not reflect the average for Herne Bay which is largely residential. OBS2 Beltinge is on a 200m wide strip of land between the A299 dual carriageway and the main high-speed railway line. OBS3 Avenue of Remembrance is one of the two central thoroughfares through the town. OBS 4 Studio Herne Bay (Studd Hill) is adjacent to the main high-speed railway line.

Even given that, the difference claimed by RSP between current average noise and the projected levels resulting from the airport – ranging from +0.1-1.0 dB does not reflect the true impact of the proposal. Over Herne Bay the estimated height of aircraft is 2400 feet – at which (NATS statistics) aircraft noise is at 66-80 dB. The World Health Organisation statistics on aircraft noise describes ‘moderate community annoyance’ at a threshold of 50 dB and ‘severe annoyance’ at 55 dB. Add to that the estimate of 20 or more night flights and the effect on sleep, daily life, health and education will be more than ‘severe’.

d. TRAFFIC & TRANSPORT

I would like the Planning Inspector to consider whether the application addresses the real extent of impact on local road networks of the proposed scale of operation. The proposal forecasts from 9,903 HGV movements in year 2 to 64,906 annual HGV movements by year 20. Yet East Midlands Airport says it has 182,500 HGV movements a year and RSP forecasts Manston will handle more freight than East Midlands. The proposal documentation shows little detailed consideration of the need for additional road capacity beyond the immediate surrounding of the airport. However, the M2 and A299 – the only fast access route to Herne Bay and Thanet – are both only two-lane and already busy with HGV traffic.

e. ECONOMIC IMPACT

Herne Bay experienced a significant economic downturn typical of former holiday resorts from the 1960s onwards – becoming the ‘poor relation’ to Canterbury and Whitstable. In the past five years, the town has seen a marked economic revival, thanks to increasing numbers of day visitors and inward investment in leisure facilities including leisure shopping. Rises in property prices have followed, buoyed also by an overspill effect from London investors following the success of Whitstable. This new prosperity would be severely threatened by 24-hour aircraft noise and heavy traffic.

The contour below seems like a bit of a random addition?



Reproducing Allen Burrows
 121 Rotherham Road, London SE16 6SH
 Tel: 020 7766 4411 Fax: 020 7766 4400
 Email: mail@allenburrows.com

Legend

Reproduced from Ordnance Survey
 Copyright © Crown copyright 2010.
 All rights reserved.

Drawing Title
MANSTON AIRPORT
 Boeing 747-400
 85, 90 and 95 dB(A) SEL Noise
 Footprints
 Approach Runway 10

Scale at A3
 1:50,000

Date:
 September 2011

Drawing Number
Figure-4.3