



TR020002 MANSTON AIRPORT DCO APPLICATION, RSP LTD

DEADLINE 8 SUBMISSION FROM RAMSGATE TOWN TEAM, JUNE 2019

Ramsgate Town Team is a constituted voluntary body whose mission is to make Ramsgate a great place to live, work, do business and visit. We are registered as an interested party in this process.

Further to our previous submissions, and in the light of information from recent hearings, we would wish the Examining Authority to take note of the following additional points:

1. Noise impact:

The noise contours submitted by RSP Ltd are extremely limited and show very little anticipated impact from noise in local communities except those immediately adjacent to the runway. In the light of RSP Ltd's own admission in its original PEIR that 'severe adverse impacts' are anticipated in Ramsgate and several other communities, this is somewhat surprising.

One of our members asked about these contours at one of the very few consultation sessions initially run by RSP, and was advised that their area would be unaffected as aircraft would 'just glide' over the town of Ramsgate. We have yet to understand by what aeronautical innovation this is expected to happen.

By contrast, the contours commissioned independently by the No Night Flights group of affected residents from the Civil Aviation Authority (see submitted document NNF18) and discussed at the recent hearings show a much wider area likely to be affected severely by noise – a conclusion backed up by the lived experience of residents when the airport operated previously. The CAA data suggest that many thousands of residents in Ramsgate and the surrounding area will suffer noise levels exceeding those in the World Health Organisation's guidance. This is unacceptable.

If the DCO succeeds, we gather that flights are anticipated roughly every ten minutes throughout the day. This is hugely more than have ever flown out of Manston before.

This will have a severe negative effect on Ramsgate & its environs, particularly in respect of:

- health: this area suffers from poor physical and mental health and has a higher than average proportion of older residents
- education: the area has poor educational outcomes and will suffer further adverse effects from noise. There are 5 schools directly under the flight path and others within a short distance.
- tourism: few visitors will wish to visit a noisy and polluted area, with a resulting reduction in tourism businesses and a loss of jobs. Since the airport closed, the visitor economy in the area has expanded substantially, but this revival is threatened by RSP's plans.

2. Human Rights impact:

In 2012, Infratil, which then owned Manston Airport, tried to boost its flagging business by introducing night flights. Thanet District Council refused permission, however: its reasons included:

- *“(Our)... consultation shows 73% of respondents are opposed to night-time flying.*
- *Noise and environmental impacts are underestimated.*
- *The number of jobs generated and the economic benefits maybe overestimated.*
- *The probable detrimental impact of night-time flying on Thanet’s recovering Tourism Industry.*
- *Concerns raised in the World Health Organisation’s assessment of the impacts of disturbed sleep.*
- *There is concern that the Night-Time Flying proposals have not considered Article 8 of the Human Rights Act.”*

We understand that RSP Ltd insist that night flights are not part of the current proposal. We find it hard to understand how in that case this can be classified as an essential National Infrastructure Project, or indeed that sufficient Air Traffic Movements to qualify as such can be achieved without these. However, we will leave this matter aside and consider the Human Rights implications of RSP’s plans.

Article 8 of the European Convention on Human Rights, incorporated into UK law by the Human Rights Act, states that we all have a right to respect for our private and family life, home and correspondence, and that no public authority can interfere with the exercise of this right except if this is necessary in the interests of national security, public safety or the economic wellbeing of the country, to protect health or morals or to protect the rights and freedoms of others.

Cynics might suggest that the only rights and freedoms that are under consideration for being protected in this case appear to be the asserted ‘rights’ of RSP Ltd to deprive another company of its land at a knock-down price, and at the same time deprive the 44,000 residents of Ramsgate of the peaceful enjoyment of their homes and surroundings.

A CPO at Manston cannot be required in the interests of national security or national economic wellbeing. More than sufficient cargo handling capacity exists at other airports to cover national requirements, and a third runway at Heathrow will expand this still further. RSP’s own business plan relies on attracting business from other airports, which appears in our view to contradict its case for the national importance of its project. This cannot be regarded as a nationally significant project – but meanwhile the rights and freedoms of residents are being placed at severe risk.

We understand that Article 8 places a procedural obligation on Government decision-making – that in order to decide if a Government decision is fair, a court must consider whether affected individuals have been given sufficient information and been sufficiently involved in the decision-making process to enable them to contribute and protect their interests.

In this case, consultation by RSP Ltd was minimal, information requested by both residents and the Examining Authority itself has not been forthcoming, and residents have been obliged to raise funds to commission their own studies on matters such as the noise contours above because the information provided by RSP was lacking or appeared suspect.

Throughout this process, residents have had to expend their own time and money to secure information which we would have expected to have been made available by the applicant. Frequently the applicant has not complied with repeated deadlines for information set by the ExA, which has meant residents in making their own submissions did not have access to all the information they required. We believe it would therefore be very difficult to argue that in this case residents have been given sufficient information to enable them to protect their interests.

3. Financial impact:

It is a given that proximity to an airport has a negative effect on house prices – for example, a 2016 report on the impact of approval of a third runway at Heathrow aimed at property investors stated: *“The government’s decision to approve a third runway at Heathrow yesterday may have paved the way for hundreds of thousands more flights a year at the airport in west London, but it is likely to have an adverse impact on the price of residential properties in the local area... But if the project does indeed go ahead, it could wipe millions of pounds off local home prices, primarily due to the noise...”* (Property Investor Today, 26 October 2016) Reductions in value of at least 20% are expected, and homeowners living in the Heathrow expansion zone are due to receive 25% more than the ‘unblighted’ value of their properties under the proposed compensation scheme.

By contrast, no direct compensation to homeowners is proposed by RSP Ltd, but a small number of residents may be offered modest grants for noise insulation. At this point RSP’s strangely limited noise contours come into their own: instead of the tens of thousands of affected residents shown in the CAA documentation being offered funding, RSP proposes to offer very modest help only to a few hundred affected residents living in immediate proximity to the airport. It is unclear whether schools and educational institutions affected will be able to make claims, and equally unclear how residents and business owners in the listed Georgian, Victorian and Edwardian buildings that make Ramsgate the architectural jewel it is may gain permission to install such insulation if they can obtain it.

On the basis of the CAA contours, many thousands of residents should be entitled to funds to assist with noise insulation. We would ask the Examining Authority, therefore, to consider the level of funds that would be required to provide this and (as part of their overall thinking regarding RSP’s financial status and appropriateness to run a project of this size, where it appears there are many unresolved questions) whether RSP Ltd in fact has access to appropriate levels of funding to offer insulation grants to all those affected – let alone the many millions of pounds that would be required to launch and run a successful airport in the furthest corner of the South-East of England, bordered on three sides by sea.

We believe the answer is no.

We believe that RSP, who have rejected offers to lease the land at Manston, know that they have no realistic prospect of running an airport and instead hope to acquire prime housebuilding land from its legal owners at a massively reduced price, offering derisory insulation grants to a handful of local residents as the price for destroying their wellbeing.

We have seen no evidence that there is an overwhelming need for this project, nor that RSP could deliver it if there was.

Meanwhile the 44,000 residents of Ramsgate, the businesses in its visitor economy, its schools and educational institutions have already suffered years of uncertainty, and now face the prospect of life-changing negative consequences if the DCO is approved.

We urge the Examining Authority to uphold the human rights of residents and reject this application.