

Section 1: Feedback received to the Design Principles Questionnaire

Manston Airport Airspace Design and Procedures

Design Principles Questionnaire

The questions below are designed to help RiverOak Strategic Partners (RSP) understand the constraints that should be considered during the Civil Aviation Authority's (CAA) CAP 1616 Design Principles process. For technical information on planned operations at Manston Airport, please refer to Appendix A – Technical Information on the Airspace Design Principles for Manston Airport, Manston Airport Instrument Flight Procedures.

Please insert your responses below to each of the following questions; the size of the response box will expand as you type your response. Use as much space as you need, or alternatively attach additional sheets or documents making it clear which questions you are responding to. Please do not feel constrained in your response to any question. If you wish to highlight any other relevant local constraints or issues, we would welcome any feedback that will support the development of the Airspace Design Principles. If any of the questions are not applicable or relevant, please say so against the appropriate question.

Please save your completed questionnaire and any other supporting documents and return them to us by Friday 15th November 2019 using your method of choice.

- Details of methods for return are listed in the 'How to Respond' section of the accompanying leaflet you will have received with this questionnaire.
- We thank you in advance for completing this questionnaire. Your comments will be considered in the development of a shortlist of Airspace Design Principles that we will share with you for further comment before they are finalised and submitted to the Civil Aviation Authority.
- Once the Airspace Design Principles are approved by the CAA following successful completion of the Stage 1 DEFINE gateway, they will be used as a framework for the development of Design Options proposals for airspace design and procedures that will be widely consulted on.

**Please complete
the following
questions
overleaf:**

Question

Q1 - Please list any altitude constraints, together with your reasons, that you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures?

Your Response: No Comment

Q2 - Please inform us of the latest proposed timescales for any neighbouring airspace/procedure re-design projects?

Your Response: LAMP 2, which Manston Airport are already aware of. Timescales in conjunction with FASI-South programme.

Q3 - Please advise us of any future requirements for coordination (particularly adjacent/contiguous routes) between Manston Airport and adjacent Air Navigation Service Provider (ANSP) units that should be considered during the development of the Design Principles, Design Options and when implementing the new Manston Airport departure and approach procedures?

Your Response: Co-ordination with NATS (TC) regarding the control of aircraft through the point merge system which controls the flow of aircraft into the London TMA, including traffic bound for Biggin Hill Airport.

Q4 - Are there any aspects of CAA Airspace Modernisation Strategy (e.g. airway entry/exit points, existing planned or new handover points) that RiverOak Strategic Partners should take into account in the design of procedures? Please provide details.

Your Response: See Q4

Q5 - Are you aware of anything in the CAA Airspace Modernisation Strategy that presents a risk or opportunity to Manston Airport procedure development? Please provide details.

Your Response LAMP 2, which could provide opportunities for more direct routings and continuous climb and descent profiles.

Q6 - Have you previously had a Letter of Agreement or Memorandum of Understanding with the Operators of the 'previous' Manston Airport? If so, do you see this as an agreement that could influence the design of the Manston Airport departure and approach procedures? Please provide details.

Your Response: No

Q7 - Please let us know if there are any day or evening time constraints that you consider RiverOak Strategic Partners could take into account when designing its departure and approach procedures? Please provide details and reasons.

Your Response:

Q8 - Please tell us if there are any other operational constraints that RiverOak Strategic Partners will need to consider when planning its new arrival and departure procedures?

Your Response: See Q3.

Q9 - Please inform us of who you consider to be the other key local aviation stakeholders that you believe RiverOak Strategic Partners should engage with during the process of designing its new procedures? Please provide details and reasons.

Your Response: Maypole Airfield – located beneath the flight path to the West of the Aerodrome.

Q10 - Please provide details of any constraints imposed by restricted operations in the area encompassed by Manston Airport flight operations (e.g. military operations, danger areas, restricted areas, route crossings, transit corridors, training areas etc.)?

Your Response: Active military Danger Areas to the North of Manston and Southend Airport Air Traffic.

Q11 - Please provide details of any issues or constraints due to local helicopter operations that you believe may have an impact on Manston Airport's procedure design project?

Your Response:

Q12 - Please provide details of any issues or constraints due to local General Aviation operations that you believe may have an impact on Manston Airport's departure and approach procedures?

Your Response:

Q13 - Please provide details of any constraints that may be occasioned by local gliding activities on Manston Airport's procedure design project.

Your Response:

Q14 - We would be grateful for any views you may wish to express regarding how RiverOak Strategic Partners should balance the needs of the airlines operating from Manston Airport against the needs of the local community.

Your Response: Restrict/Limit night flying.

Q15 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response: International FIR Boundary and limitations of Radar Service in/over adjacent Wind Farms.

From: [REDACTED]
To: manstonairspace
Subject: RE: Reminder - Manston Airport Airspace Design Principles Questionnaire
Date: 24 November 2019 17:47:32

Thanks for this.

We encourage you to engage directly with the following gliding clubs that are likely to be impacted by the IFPs as shown in the supplied documents;

- Kent Gliding Club at Challock airfield. Contact [REDACTED]
- Channel Gliding Club at Waldershare Park airfield. Contact [REDACTED]

Meanwhile, your ACP principles should reflect the following points;

- Recognition that GA including sporting and recreational aviation has legitimate rights of access to airspace.
- Sponsors must show how they are integrating their proposal within the overall UK airspace modernisation context (for example, proposals which do not connect efficiently between upper and lower airspace (potentially under different airspace "management") would only inhibit overall airspace efficiency and therefore not receive our support.
- Reiteration that the UK airspace's default classification is G.
- Reiteration that ICAO Class E airspace default is without the addition of a TMZ or RMZ
- Expectation that data used, particularly forecasts, includes details of any and all assumptions and available supporting evidence
- Reasonably justified forecast traffic levels
- Analysis of overall airspace safety changes, ie based on modelling and evidence rather than subjective opinion
- Minimum size of existing and any proposed controlled airspace
- Steeper and continuous climbs and descents for cost and environmental benefits as well as minimisation of controlled airspace footprint
- Use of Class E airspace as an alternative to class C and D airspace
- Optimisation of the development work above and below the 7,000ft NATS en-route split
- Flexible use of airspace
- Examine options for interoperability with existing e-conspicuity, eg ADS-B, FLARM and PilotAware
- Efficient consultation

Kind regards

[REDACTED]

BGA

From: manstonairspace <manstonairspace@communityrelations.co.uk>
Sent: 22 November 2019 10:18
To: manstonairspace <manstonairspace@communityrelations.co.uk>
Subject: Reminder - Manston Airport Airspace Design Principles Questionnaire

Good Morning

RiverOak Strategic Partners (RSP) and aviation specialist, Osprey Consulting Services are seeking your input to the questionnaire which was sent to you on the 22nd October which will help inform the Airspace Design Principles for Manston Airport in accordance with the Civil Aviation Authority's (CAA) CAP1616 Design Process.

We recognise that we have not received a questionnaire from you and while the deadline of 15th November has now passed, we believe that your feedback on this matter is very important to us.

If we receive your completed and signed questionnaire by 29th November 2019 to manstonairspace@communityrelations.co.uk we can still take your input to our draft Airspace Design Principles into account. We do hope you will return it to us.

Please find re-attached the following documents:

1. A leaflet explaining the CAA's (CAP) 1616 process and how to complete the questionnaire
2. The questionnaire
3. Appendix A which supports the questionnaire with technical information on the Design Principles for Manston Airport

If you have any further queries, please contact the Manston Airport team.

Yours sincerely

RiverOak Strategic Partners

Manston Airport Team

Tel: 0800 030 4137

Email: manstonairspace@communityrelations.co.uk

Website: www.rsp.co.uk

'RSP may share your personal data with third parties in relation to the proposed development of Manston Airport. Please refer to our Privacy Policy on our website www.rsp.co.uk/privacy-policy for details.'

British Microlight Aircraft Association

Policy for Design Principles during ACP engagement

Introduction

The following text describes the underlying principles that the British Microlight Aircraft Association (BMAA) believes must be followed by applicants for airspace change proposals.

Consultation

1. The BMAA welcomes the opportunity to engage in consultation at an early stage within the ACP CAP 1616 process.
2. Sponsors are encouraged to engage with the BMAA and its members as early as possible during the development of the ACP. Previous ACPs have missed the opportunity for early engagement and dialogue resulting in significant and costly delays.

Airspace classification

1. The BMAA considers that the UK airspace's default classification is G and that sponsors must establish a safety case for proposing to change this class or add any further restrictions or requirements by their ACP.
2. All sponsors must demonstrate that alternatives have been considered such as RMZ and TMZ before considering controlled airspace.
3. Class E without a TMZ should be considered as a normal option.

Access by GA

1. Sponsors must accept the assumption that GA including sporting and recreational aviation is entitled to continued safe use of airspace and that commercial aviation does not have a right to limit airspace access.
2. Sponsors should ensure that there will be measures to allow flexible use of airspace and prepare for the wider use of electronic conspicuity devices and interoperability with existing e-conspicuity, e.g. FLARM and Pilot Aware etc...

Airspace volume

1. In line with the principles of the Airspace Modernisation (was FAS) principles the ACP must respect the requirement for minimum airspace volumes designed for efficiency and reduced environmental impact. These principles will include:
 - Minimum size of controlled airspace
 - Minimum number of departure/arrival routes
 - Steeper and continuous climbs and descents for cost and environmental benefits as well as minimisation of CAS footprint.

Justification

1. Sponsors must conduct and present proper analysis of overall airspace safety changes i.e. based on modelling and evidence rather than purely subjective opinion.
2. Sponsors must provide proper validation of forecast traffic levels. There is an expectation that data used, particularly forecasts, will be verifiable including details of any and all assumptions.

Airspace integration

1. Sponsors must show how they are integrating their proposal within the overall UK airspace modernisation context, for example proposals which do not connect efficiently between upper and lower airspace (potentially under different airspace "management") would only inhibit overall airspace efficiency and therefore not receive our support)
2. Optimisation of the development work above and below the 7,000ft NATS en-route split.

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Question

Q1 - Please list the facilities in your local area that you believe would be most affected by aircraft noise (e.g. hospitals, schools, parks, hospices etc.)?

Your Response:

Chestfield Parish is far enough removed from Manston that generally aircraft over flying would be at a high altitude and there are other areas/parishes that should be given a greater consideration in respect of their affected amenities.

Q2 - Please tell us if multiple routes that disperse noise across a greater number of households are more of a priority for you than a single route that concentrates noise along a track above a smaller number of households.

Your Response:

Yes, multiple routes that share noise exposure over more people but less frequently seems a fairer approach to implement.

Q3 - Please highlight your awareness of any particularly sensitive issues with aircraft noise over the early morning and late evening period.

Your Response:

Chestfield Parish Council notes the proposed hours of operation as 6am to 23pm daily.

There should not be an extension to include night flying (between 11pm and 6am).

There are World Health Organisation studies on the effect on people's health, well-being and sleep patterns over night flights.

Q4 - Please identify any other areas, that are not necessarily local to you, that in your opinion may be sensitive to either direct overflight or exposure to aircraft noise?

Your Response: No response.

Q5 - Do you believe aircraft conducting continuous climbs to altitude after taking off (where this is safe to do so) may reduce exposure to noise in your local area?

Your Response:

Yes.

Q6 - Please tell us the locations of any particularly sensitive wildlife habitats, not already notified (linked to Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) etc.) that you feel aircraft could avoid?

Your Response:

None other the known AONB and SSSI sites locally.

Q7 - Please state what principles you believe we can adopt to mitigate (in full or in part) regarding the impact of airliner exhaust fumes or pollution?

Your Response: The parish council is not qualified sufficiently to comment.

Q8 - Please bring to our attention any recent or ongoing local environmental studies you feel should be considered by RiverOak Strategic Partners when designing the new departure and approach procedures?

Your Response:

The proposed route swathes in the Development Consent Order are different from when the airport previously operated.

The route swathes should mimic what occurred before with most departures to the north to less densely populated areas rather than the new proposed southerly routes over densely urban populated areas.

Q9 - Are there any other local development projects, perhaps currently at the planning stage, that RiverOak Strategic Partners should be aware of and consider when planning Manston Airport's departure and approach procedures?

Your Response: There are 3,000 houses planned for Herne Bay as set out in the Canterbury Local Plan adopted in July 2017. And 300 homes have recently been given planning permission near Chestfield and 300 are planned for Whitstable.

Q10 - Please list any other relevant local or national organisations that you believe RiverOak Strategic Partners should ensure are involved in public consultation.

Your Response:

The documentation states that 30% of arriving aircraft will arrive over Herne Bay. Herne Bay is not represented by any parish councils, so it is important to engage with the Ward Councillors at both Canterbury City Council level and Kent County Council level for Herne Bay to ensure that this area has a voice.

Q11 - Please provide the location of any future planned facilities you are aware of in your local area that could be considered sensitive to the impact of aircraft noise; please state why you feel this is necessary.

Your Response:

None known.

Q12 - We would be grateful for your views about how RiverOak Strategic Partners should balance the needs of airlines operating from Manston Airport against the needs of the local community.

Your Response: None.

Q13 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response: As in Q8 above, The proposed route swathes in the Development Consent Order are different from when the airport previously operated.

The route swathes should mimic what occurred before with most departures to the north to less densely populated areas rather than the new proposed southerly routes over densely urban populated areas.

Question

Q1 - Please list the facilities in your local area that you believe would be most affected by aircraft noise (e.g. hospitals, schools, parks, hospices etc.)?

Your Response:

Areas above the Airport's height above sea level will be more affected than those below that height, and therefore even more affected by the noise and pollution from aircraft.

This means that flight paths must be as high as possible.

All areas visited by people, whether high profile ones such as Canterbury Cathedral, or less visited but equally important areas such as the large expanse of Blean woods.

All tranquil areas as defined by the CPRE Tranquillity maps, all areas of importance to nature.

All areas are of concern because of the increase in noise caused by the aircraft flights, especially as 10,000 of them will be noisy cargo aircraft, usually types that were designed some 30 years, so noisier than later designs.

The global dedicated cargo fleet is dominated by jumbo jets. Shortened approaches may suit light and even some medium sized aircraft but not 747s. So the worst case must be assumed for noise and pollution emissions, and flightpaths for the worst case, such as fully loaded aircraft, must be used.

It is totally unacceptable to have most of such noise and the loudest noise for the large towns under the flight paths, such as Ramsgate and Herne Bay.

As the Independent Commissioner for Civil Aviation Noise (ICCAN) has said, such increases in noise cannot be compensated for by a claimed, but disputed, potential economic benefit.

As well as the 'standard' list of what to avoid such as education facilities, health care locations, entertainment facilities, tourist facilities, etc., there are also nursery and childcare facilities, special needs schools, EastKent Mencap - Day Resource, Winter Shelters, rest / care homes. Also the homes that house individuals under the Kent county council Shared lives scheme, mental health facilities.

Obviously for humans, the areas least affected by aircraft noise and pollution are those at sea, but areas proposed for flyover would still need assessing for wildlife, such as birds.

Therefore the first rule for proposed flight paths should be to go over the sea as much as possible, with carefully chosen routes between the coast and airport.

See also Answers to Q 13.

Q2 - Please tell us if multiple routes that disperse noise across a greater number of households are more of a priority for you than a single route that concentrates noise along a track above a smaller number of households.

Your Response:

PBN means that any chosen route will be very narrow, magnifying the noise and pollution impacts.

Therefore several PBN should be available with careful choice of when they would be used.

With four such routes each route could be used for four hours a day, with the routes changed every day on a four day cycle.

Hence Route 1 would use 7 to 11 am on Monday, with Route 2 for 11 am to 3 pm, etc., then again on Friday. On Tuesday, Route 2 would use 7 am to 11am, & again on Saturday, and so on.

Wide public consultation of those potentially affected would be needed to refine this, but it illustrates the potential to avoid any one area always receiving the intensive narrow flow of aircraft overhead at the same time everyday.

Although this would need the Airport Traffic Control to have slightly more complicated schedules, this extra effort is required as part of the "Balance" between the actions required by the airport and its users and the enormous impact of this new intrusion in the lives of the people and environment in the area.

Q3 - Please highlight your awareness of any particularly sensitive issues with aircraft noise over the early morning and late evening period.

Your Response:

As a new and very intrusive source of noise and pollution, early morning flights wake people up, and late evening flights either wake up people already asleep or make it more difficult for those trying to go to sleep, with commitment impacts on their health and mental well being.

So flights must be after 9.30 am and before 7 pm.

Q4 - Please identify any other areas, that are not necessarily local to you, that in your opinion may be sensitive to either direct overflight or exposure to aircraft noise?

Your Response: All areas

Q5 - Do you believe aircraft conducting continuous climbs to altitude after taking off (where this is safe to do so) may reduce exposure to noise in your local area?

Your Response

Depends on aircraft type and loading, because aircraft can be fitted with different engines and so noise profile varies for a given rate of climb.

Likewise a heavily laden aircraft will be more noisy and some engines may be unable to provide higher rates of climb without excessive noise.

Hence flight profiles need to be chosen to give minimum noise for the specific aircraft.

It is also essential to have airport policies which penalise noisier aircraft, as recommended by ICCAN (see: Question 12), so that the more modern, and generally less noisy aircraft are used.

See Question 13 for more details on choosing flightpaths.

Q6 - Please tell us the locations of any particularly sensitive wildlife habitats, not already notified (linked to Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) etc.) that you feel aircraft could avoid?

Your Response:

All areas – nature is not restricted to SSSIs.

With the recent State of Nature 2019 Report showing that most species are suffering continuing and devastating declines, it is essential to avoid potential impacts.

Especially relevant to North East Kent Marine Protected Area (NEKMPA) which includes the North East Kent European Marine Site (NEKEMS) and the more recent Marine Conservation Zone (MCZ). These sites are amongst some of the best wildlife sites in Europe.

Q7 - Please state what principles you believe we can adopt to mitigate (in full or in part) regarding the impact of airliner exhaust fumes or pollution?

Your Response:

Please do not use the terms: “mitigate” nor “to limit” impacts. “Reduction” is what is needed, as ICCAN has said (see Q 12).

Use the latest lower pollution aircraft.

No fuel dumping, and optimum engine power for the relevant flight manoeuvre.

Q8 - Please bring to our attention any recent or ongoing local environmental studies you feel should be considered by RiverOak Strategic Partners when designing the new departure and approach procedures?

Your Response:

All those brought to the Examination and any subsequent ones.

See also Q 6.

Q9 - Are there any other local development projects, perhaps currently at the planning stage, that RiverOak Strategic Partners should be aware of and consider when planning Manston Airport's departure and approach procedures?

Your Response:

Q10 - Please list any other relevant local or national organisations that you believe RiverOak Strategic Partners should ensure are involved in public consultation.

Your Response:

More people and organisations should have been invited to your recent meetings, which excluded large numbers who would have filled in this questionnaire or communicated by other modes.

This is against the Guidance given to you by the CAA, Paragraph 109 of which asks for evidence of involving everyone potentially affected, and of course negates the expectation of ICCAN for you to build up trust, not reduce it.

We would need a list of those that are or have been involved so far before additional ones can be suggested.

Initial list would be:

All those who made Relevant Representations to the Examination.

All Parish, Town, District & County Councils from Sittingbourne eastwards.

Organisations listed under: "Conservation Groups in Kent" on www.locallife.co.uk/

Obviously the Independent Commissioner for Civil Aviation Noise (ICCAN) needs to be involved at all stages of the process.

In addition need maximum publicity of the consultation clearly highlighting the potential adverse impacts of proposals.

Q11 - Please provide the location of any future planned facilities you are aware of in your local area that could be considered sensitive to the impact of aircraft noise; please state why you feel this is necessary.

Your Response:

Q12 - We would be grateful for your views about how RiverOak Strategic Partners should balance the needs of airlines operating from Manston Airport against the needs of the local community. ---> **PTO**

Q12 - We would be grateful for your views about how RiverOak Strategic Partners should balance the needs of airlines operating from Manston Airport against the needs of the local community.

Your Response:

At existing airports, some expansion is possible as the aircraft become modernised and slight less noisy and less polluting, and sometimes with better flight management.

At Manston "Balance" is impossible because it is not an existing airport and therefore all the noise and pollution is going to be highly intrusive.

It should be noted that the Independent Commissioner for Civil Aviation Noise (ICCAN) in its response to the Heathrow Airspace Consultation on 4 March, 2019, said:

"• in relation to your proposed noise objective, we would want to see:

- o **what specific activities the airport will undertake to achieve the objective**
- o **more measurable and specific details on how the airport can be held to account on its noise objective by the community**
- o activities associated with achieving that objective prioritising a **reduction in the effects of noise on health and quality of life, rather than simply limiting it**
- in relation to directional managed preference, we understand that the airport would wish to adopt such an approach; however, we would expect to see clearly agreed principles about communication with communities and any extra communication for unplanned changes
- we welcome a longer time without night flights and would expect the airport to penalise airlines who breach night flight rules
- we expect the airport to minimise flights outside the proposed scheduled night flight ban; however, for those flights that do take place we would support all four measures – although a night quota system should be an absolute maximum and not a target

We recognise that your proposals will evolve as more detail is shared publicly and different options are considered. As Heathrow further develops its plans, ICCAN expects the airport to set out how the details of future operations and different use of existing runways:

- **can aim to reduce overall noise**
 - **will impact on different communities**
 - **will be shared with different communities in meaningful ways**
 - **will reduce out of hours flights – permitted and not permitted – including exceptions**
- In addition, ICCAN will want to see how the airport will:
- **reduce the number of older and noisier aircraft using the airport and the numbers of flights from noisier aircraft**
 - **set out the range of noise improvements that communities should expect to see from different options**
 - **set out how new technology can reduce the impact of aircraft noise on specific communities**
 - ensure communities share in the proceeds of airport/air travel growth through, for example, home insulation, community projects, and local infrastructure/facilities".

In addition they also emphasised the '**recurring issue is that of trust**': "We are already clear that one of ICCAN's primary aims will be to strengthen trust between airports and their local communities. This will rely on complete honesty and transparency on both sides – and we will be urging airports to ensure that commitments that are made during consultations are honoured. To this end, we expect the airport to be explicit in terms of how it will measure progress against the commitments to reduce noise, and clear in how it communicates its delivery against those commitments to the communities around the airport."

Trust in RSP starts from a very low level, in particular because the issue of Night Flights has been given different interpretations throughout the past three years, as well as what have appeared to be deliberate attempts to stifle opposition.

This means that RSP must work very hard to try and regain that trust, and following ICCAN's advice would be a good start to that.

Hence answer to this is do not open the airport.

Otherwise in order to minimise the impacts, the airport must have very restricted operations, carefully chosen to minimise those impacts.

Q13 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response:

Your Appendix A, Paragraph 1.2 says: “The airspace above London and the south east of England is some of the busiest in the world but is **approaching the limit of its design capacity.**”

This adds to the extensive evidence at the Examination against the Proposals, and obviously on safety grounds alone, the fewer the aircraft there are in this heavily congested airspace, the safer it will be – and much easier to be managed by NATS and others.

So there should be NO flights from Manston.

If there to be any flights, then, all routes should be chosen to minimise flight distance over land and maximise distance over the sea.

As has been emphasised many times, Manston is surrounded on three sides by the sea, and flights over the sea, especially as they would not be at low level, need to be maximised.

So all flights going over Ramsgate must come and go entirely over the sea. These routes need to go well beyond the shore before turning to avoid disturbing the coastal areas. The swathes shown in your presentation go much too near to the Thanet coast.

Your Presentation shows swathes for flights over Ramsgate turning much closer to Manston than those going over the Herne bay area, so flights to or from the west could turn much nearer to Manston, and follow the Wantsum channel northward to and from the Thames estuary before continuing their journey.

In this way the flights coming from or going to the west go over the sea until close to Manston, thus minimising flight lengths over the land.

This means that for Runway 28, departures for flights to the south would follow the same initial route as departures to the north, but then turn east over the sea, and east of Thanet, before going south.

Likewise for Runway 10, Arrivals from the south would come the same route as Runway 28 southerly Arrivals, but carry on north around Thanet, before turning West.

The two swathes for flights to Runway 28 or from Runway 10 would be at different heights above sea level, and therefore would not conflict with traffic travelling in the opposite direction.

Manston flights will also be lower than those from the London airports, such as City, Southend, Gatwick etc, so should avoid any conflicts around East Kent.

Appendix A, Paragraph 3.2 refers to “aircraft will need to be aligned with the runway heading for approximately the final 8 miles of the approach”.

As indicated in Figure 1, Indicative Route Swathes for Runway 28, the easterly arrivals turn much less than 8 miles from the airport.

So it is unclear why Figure 2, Indicative Route Swathes for Runway 10, shows that all Westerly arrivals will go over the whole width of Herne Bay, despite this being a significant conurbation.

The flights should also be as high as possible, and should use Continuous Descent Approach.

The claims made by RSP for most flights to fly to or from the west, and thus reducing flights over Ramsgate is nonsense. The pilot has ultimate responsibility for safety of his plane, and as pointed out at the Examination tail winds of anything more than 5 mph are unacceptable because of the safety risks.

Appendix A, Paragraph 3.6, refers to reducing emissions by using straight line flightpaths. However the savings on the very short distance around the airport mean that the fuel savings would be a very small percentage of the total fuel used over the whole journey, so is irrelevant, and misleading.

Much more fuel would be saved by avoiding 'tankering', that is the common practice of over-filling with fuel at airports with the cheapest fuel, to avoid paying more at airports en route, where fuel is more expensive. Eurocontrol for example, calculates that this practice causes an additional 901,000 tonnes of CO₂, which must be doubled to take account of the other emissions.

Finally, Appendix A, Paragraph 3.7, refers to time of day. Clearly there must be NO Night Flights, and most flights should be between 10 am and 5 pm.

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Question

Q1 - Please list the facilities in your local area that you believe would be most affected by aircraft noise (e.g. hospitals, schools, parks, hospices etc.)?

The Technical Information document states 70% of arrivals will be over Ramsgate and 30% over Herne Bay. These figures are swapped over for departures. No reference is made to flights over the Dover District. This is contradicted by information in Figure 1 of the document which, in relation to Runway 28, shows the indicative swathe for departures to the south follow a route over West Stourmouth, Wingham, Eastry, Studdal & Kingsdown. It is presumed arrivals to Runway 28 would follow the same path in the opposite direction.

There are several sensitive facilities in relation to Runway 28. This list is not exhaustive.

- Preston Primary School, Preston
- St Faiths Prep School, Ash
- Ash Cartwright and Kelsey CEP School, Ash
- Wingham Primary School, Wingham
- Eastry CEP School, Eastry
- Northbourne CEP School, Northborne
- Northbourne Park School, Northbourne
- Kingsdown & Ringwould CEP School, Kingsdown
- Langdon Primary School, Langdon
- High View Oast Nursing Home, Ash
- Oakfield House Retirement Home, Wingham
- Gate House (adults with learning disabilities), Eastry
- Seahaven Care Home & Kingsdown Lodge, Deal
- Wellington House (adults with learning disabilities), Deal
- Channel Lea (adults with learning disabilities), Deal
- Meadowside ((adults with learning disabilities), Deal
- St Anselms Nursing Home, Deal
- Generals Meadow residential home, Walmer
- Bradfield Residential Home, Walmer
- Phoenix House (mental health needs), Deal
- The Old Vicarage Residential Home, Timanstone
- Victoria Walmer & District War Memorial Hospital, Deal
- The Downs C of E Primary School, Deal
- St Mary's Catholic School, Deal

Q2 - Please tell us if multiple routes that disperse noise across a greater number of households are more of a priority for you than a single route that concentrates noise along a track above a smaller number of households.

In order to answer this question, the District Council would need further information e.g. detailed noise mapping predictions, background levels, times of flights, amount of flights and maps of routes. This would assist in establishing the amount of people effected and enable us to make comparisons against current back ground levels.

Q3 - Please highlight your awareness of any particularly sensitive issues with aircraft noise over the early morning and late evening period.

Large parts of the district are rural and made up of a number of villages, hamlets and farming areas including livestock. As such there are large areas with very low background noise levels as they are distant from major roads and industry. Such areas are valued for their tranquillity. The indicative route swathes for Runway 28 cross such areas and aircraft noise in the late evening and early morning is likely to be particularly noticeable.

Q4 - Please identify any other areas, that are not necessarily local to you, that in your opinion may be sensitive to either direct overflight or exposure to aircraft noise?

Your Response:

We presume that Thanet District Council and Canterbury City Council have both been consulted on this questionnaire and they will respond in terms of the impacts on their administrative boundaries.

Q5 - Do you believe aircraft conducting continuous climbs to altitude after taking off (where this is safe to do so) may reduce exposure to noise in your local area?

We understand continuous climbs and descents overall will cut noise especially in the local area but it can increase noise in areas some distance from the airport as in order to achieve smoother descent/climb the approach path is joined further out from the airport, This may therefore have a larger impact in the previously mentioned swathe for Runway 28. Again, in order to make an informed decision more information is needed as referred to in the response to question 2

Q6 - Please tell us the locations of any particularly sensitive wildlife habitats, not already notified (linked to Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) etc.) that you feel aircraft could avoid?

Your Response:

Kent Downs Area of Outstanding Natural Beauty
Ramsar sites to the north of Deal

Q7 - Please state what principles you believe we can adopt to mitigate (in full or in part) regarding the impact of airliner exhaust fumes or pollution?

Your Response:

The main pollutant of concern around airports is nitrogen dioxide (NO₂). NO₂ is formed by nitrogen oxide (NO_x) emissions from surface traffic, aircraft and airport operations. PM_{2.5} is also of concern, since particulate emissions from jet exhausts are almost all in this fine fraction.

The International Civil Aviation Organization (ICAO) sets international standards for smoke and certain gaseous pollutants for newly-produced large jet engines.

Dover Council expect an assessment of the impact of aircraft movements on local air quality to be regularly carried out to ensure compliance with EU Limit Values and UK Air Quality Objectives are not breached. Assessments can be carried out within guidance of the Airports Commission: Appraisal Framework

RSP should also consider the recent Easyjet announcement which stated that they intend to offset carbon emissions from the fuel used on all of its flights, making it the first major airline to operate net-zero carbon emission flights across its fleet. The budget airline said it would do this by investing in accredited carbon-offsetting schemes, including renewable and community-based projects. Carbon offsetting works by providing funds to projects that reduce CO₂ emissions elsewhere in order to compensate for emissions produced. For every tonne of carbon produced, carbon offsetting aims to eliminate one tonne by, for example, planting trees or generating solar energy.

It is, however, important to note that any carbon offsetting should only be considered as an interim measure while new technologies are being developed that would enable RSP to reinvent and de-carbonise aviation over the long term. We further understand that Easyjet have signed a memorandum of understanding with aircraft manufacturer Airbus related to a joint research project on hybrid and electric aircraft and this would be something that RSP should also consider especially as Dover District has recently declared a climate emergency.

Q8 - Please bring to our attention any recent or ongoing local environmental studies you feel should be considered by RiverOak Strategic Partners when designing the new departure and approach procedures?

Your Response:

Further work will be undertaken over the coming months as a result of the District Council recently declaring a climate emergency and it will be important that any work that is undertaken as part of this work on climate emergency is fully taken into consideration.

Q9 - Are there any other local development projects, perhaps currently at the planning stage, that RiverOak Strategic Partners should be aware of and consider when planning Manston Airport's departure and approach procedures?

Your Response:

None that we are aware of.

Please cross refer to Question 11

Q10 - Please list any other relevant local or national organisations that you believe RiverOak Strategic Partners should ensure are involved in public consultation.

Your Response:

- Environment Health Officers at DDC/CCC/TDC
- Town and Parish Council that are situated directly under or in the immediate vicinity of the proposed flight paths
- RSPB
- Sandwich Bay Trust
- Kent Wildlife Trust
- Kent Downs AoNB Unit
- KCC
- Natural England
- Historic England
- Natural Trust

Please refer to the answer to Question 11.

Q11 - Please provide the location of any future planned facilities you are aware of in your local area that could be considered sensitive to the impact of aircraft noise; please state why you feel this is necessary.

Your Response:

Dover District Council is currently in the process of preparing a Local Plan that will cover the period up to 2040. As part of this process, the Council will be allocating a range of sites for residential development. This information will be consulted on in June/July 2020 and it will be important that any work on the proposed flight paths takes into consideration the plans in the emerging Local Plan.

We are unclear whether the proposed flight path would make the allocation of any such sites in our Local Plan more difficult (i.e. because they could be exposed to unacceptable levels of noise?). Please can this be clarified. We assume that if the flight paths are confirmed that they then become a safeguarding – for height and noise?

Q12 - We would be grateful for your views about how RiverOak Strategic Partners should balance the needs of airlines operating from Manston Airport against the needs of the local community.

Your Response:

The District Council has consistently been supportive of Manston returning as an operational airport and it would expect suitable consideration of the points that have been raised in this questionnaire to be taken fully into account.

There is an expectation from the District Council that there will be a community based initiative such as the Manston airport consultative committee established in order to ensure that there is regular dialogue between the local community and interested parties.

Q13 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response:

- 1) Ensure that the maximum advantage is taken to fly over the least populated areas (the sea)
- 2) There is full public engagement on the preferred routes
- 3) Further details are forthcoming on detailed noise mapping predictions, background levels, times of flights and maps of routes and this is shared with the District Council and neighbouring planning authorities before the full consultation takes place.

Manston Airport Airspace Design and Procedures

Design Principles Questionnaire

The questions below are designed to help RiverOak Strategic Partners (RSP) understand the constraints that should be considered during the Civil Aviation Authority's (CAA) CAP 1616 Design Principles process. For technical information on planned operations at Manston Airport, please refer to Appendix A – Technical Information on the Airspace Design Principles for Manston Airport, Manston Airport Instrument Flight Procedures.

Please insert your responses below to each of the following questions; the size of the response box will expand as you type your response. Use as much space as you need, or alternatively attach additional sheets or documents making it clear which questions you are responding to. Please do not feel constrained in your response to any question. If you wish to highlight any other relevant local constraints or issues, we would welcome any feedback that will support the development of the Airspace Design Principles. If any of the questions are not applicable or relevant, please say so against the appropriate question.

Please save your completed questionnaire and any other supporting documents and return them to us by Friday 15th November 2019 using your method of choice.

- Details of methods for return are listed in the 'How to Respond' section of the accompanying leaflet you will have received with this questionnaire.
- We thank you in advance for completing this questionnaire. Your comments will be considered in the development of a shortlist of Airspace Design Principles that we will share with you for further comment before they are finalised and submitted to the Civil Aviation Authority.
- Once the Airspace Design Principles are approved by the CAA following successful completion of the Stage 1 DEFINE gateway, they will be used as a framework for the development of Design Options proposals for airspace design and procedures that will be widely consulted on.

**Please complete
the following
questions
overleaf:**

Question

Q1 - Please list the facilities in your local area that you believe would be most affected by aircraft noise (e.g. hospitals, schools, parks, hospices etc.)?

Your Response:

Q2 - Please tell us if multiple routes that disperse noise across a greater number of households are more of a priority for you than a single route that concentrates noise along a track above a smaller number of households.

Your Response:

Q3 - Please highlight your awareness of any particularly sensitive issues with aircraft noise over the early morning and late evening period.

Your Response:

Q4 - Please identify any other areas, that are not necessarily local to you, that in your opinion may be sensitive to either direct overflight or exposure to aircraft noise?

Your Response:

Q5 - Do you believe aircraft conducting continuous climbs to altitude after taking off (where this is safe to do so) may reduce exposure to noise in your local area?

Your Response

Q6 - Please tell us the locations of any particularly sensitive wildlife habitats, not already notified (linked to Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) etc.) that you feel aircraft could avoid?

Your Response:

The Swale SPA (also a SSSI and RAMSAR) – including Elmley National Nature Reserve and the Swale National Nature Reserve

Q7 - Please state what principles you believe we can adopt to mitigate (in full or in part) regarding the impact of airliner exhaust fumes or pollution?

Your Response:

Q8 - Please bring to our attention any recent or ongoing local environmental studies you feel should be considered by RiverOak Strategic Partners when designing the new departure and approach procedures?

Your Response:

Q9 - Are there any other local development projects, perhaps currently at the planning stage, that RiverOak Strategic Partners should be aware of and consider when planning Manston Airport's departure and approach procedures?

Your Response:

Q10 - Please list any other relevant local or national organisations that you believe RiverOak Strategic Partners should ensure are involved in public consultation.

Your Response:

Q11 - Please provide the location of any future planned facilities you are aware of in your local area that could be considered sensitive to the impact of aircraft noise; please state why you feel this is necessary.

Your Response:

Q12 - We would be grateful for your views about how RiverOak Strategic Partners should balance the needs of airlines operating from Manston Airport against the needs of the local community.

Your Response:

Q13 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response:

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**Please complete
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overleaf:**

Question

Q1 - Please list the facilities in your local area that you believe would be most affected by aircraft noise (e.g. hospitals, schools, parks, hospices etc.)?

Your Response:

None in the Fordwich Town Council area.

Q2 - Please tell us if multiple routes that disperse noise across a greater number of households are more of a priority for you than a single route that concentrates noise along a track above a smaller number of households.

Your Response:

Alternative PBN routes for STARs and SIDs are acceptable. Consideration should also be given to radar sequencing of arrivals to vary and shorten the track distances to final approach.

Q3 - Please highlight your awareness of any particularly sensitive issues with aircraft noise over the early morning and late evening period.

Your Response:

None in the Fordwich Town Council area.

Q4 - Please identify any other areas, that are not necessarily local to you, that in your opinion may be sensitive to either direct overflight or exposure to aircraft noise?

Your Response:

Stodmarsh Nature Reserve.

Q5 - Do you believe aircraft conducting continuous climbs to altitude after taking off (where this is safe to do so) may reduce exposure to noise in your local area?

Your Response

Approaches and departures should use the steepest routing possible. Only types able to use steep approaches should use the airport. The benefits will be a smaller Controlled Airspace footprint, and a reduction in noise footprint in the area.

Q6 - Please tell us the locations of any particularly sensitive wildlife habitats, not already notified (linked to Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) etc.) that you feel aircraft could avoid?

Your Response:

See Q4.

Q7 - Please state what principles you believe we can adopt to mitigate (in full or in part) regarding the impact of airliner exhaust fumes or pollution?

Your Response:

See also Q2 and Q5 answers. Older aircraft types with higher noise and emission levels than more recent types should be discouraged by a levy on usage fees. 'Fuel Tankering' by departing aircraft should be discouraged, to reduce unnecessary All-Up-Mass on departure and thus emission levels from prolonged time at high thrust levels.

Q8 - Please bring to our attention any recent or ongoing local environmental studies you feel should be considered by RiverOak Strategic Partners when designing the new departure and approach procedures?

Your Response:

None known in the Fordwich Town Council area.

Q9 - Are there any other local development projects, perhaps currently at the planning stage, that RiverOak Strategic Partners should be aware of and consider when planning Manston Airport's departure and approach procedures?

Your Response:

None known in the Fordwich Town Council area.

Q10 - Please list any other relevant local or national organisations that you believe RiverOak Strategic Partners should ensure are involved in public consultation.

Your Response:

RSPB, Woodland Trust, English Heritage.

Q11 - Please provide the location of any future planned facilities you are aware of in your local area that could be considered sensitive to the impact of aircraft noise; please state why you feel this is necessary.

Your Response:

None known in the Fordwich Town Council area.

Q12 - We would be grateful for your views about how RiverOak Strategic Partners should balance the needs of airlines operating from Manston Airport against the needs of the local community.

Your Response:

The revival of Manston Airport and its use by airlines is a potentially positive factor for employment opportunities in the East Kent area.

Q13 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response:

The needs of General Aviation should be considered, particularly the current helicopter school (Polar Helicopters) at Manston and Thanet Flying Club/TG Aviation. (The latter were evicted from their premises when the airfield closed.)

Airspace design should allow for the use of Maypole/Hoath airfield, approximately 7 nm WSW of the Manston Aerodrome Data point.

Airspace design should not unduly constrict airspace, particularly for General Aviation, and bearing in mind the existing volume of the adjacent Southend CTA.

Manston Airport Airspace Design and Procedures

Design Principles Questionnaire

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Question

Q1 - Please list the facilities in your local area that you believe would be most affected by aircraft noise (e.g. hospitals, schools, parks, hospices etc.)?

Please see attached spreadsheet.

Q2 - Please tell us if multiple routes that disperse noise across a greater number of households are more of a priority for you than a single route that concentrates noise along a track above a smaller number of households.

Satellite-based routes can be much more precisely flown, but this can lead to a concentration of noise. KCC is aware that this has been well-received at airports in more rural locations where routes that affect very few people can be successfully flown. However, in the South East there is a conflict between population centres and the tranquillity of our rural and protected landscapes, such as National Parks and Areas of Outstanding Natural Beauty, where ambient noise levels are low and therefore aircraft noise is more noticeable than in urban areas. It is vital that a consensus is sought on these new/modernised routes, as well as Equalities Impact Assessments carried out when at the Operations Appraisal stage.

It has long been KCC's view that concentration of flight paths results in an untenable situation where certain settlements are intensively overflown compared to the previous situation where overflight was shared through the natural variation in choices made by pilots. Performance Based Navigation (PBN) allows precise routes to be chosen and flown and we believe that this technology could be better utilised to mimic the range of routes flown before its introduction. It is our policy that the use of multiple arrival and departure routes should be specified "to provide predictable rotating respite and spread the burden of over-flight more equitably between communities."

Decisions on whether to use single routes or multiple routes, and assessment of the impacts of both, should be done in consultation with local communities and representative bodies.

Q3 - Please highlight your awareness of any particularly sensitive issues with aircraft noise over the early morning and late evening period.

There is continually emerging evidence on the impacts of aviation noise that strongly demonstrates the real health costs felt by individuals, including evidence that people are becoming more sensitive to noise than they have been before. Additionally, research is now being carried out on areas of air quality that have previously had limited research in an aviation context, such as ultrafine particulate matter. Ultimately the financial burden of health impacts due to the aviation sector are picked up by the National Health Service (NHS), and there are additional economic costs in terms of reduced productivity.

The voice of communities needs to be listened to regarding the damaging impact of aviation noise. Mitigation and compensation cannot counteract the inability of residents to sleep, the reduction in educational attainment of children, or the wider negative health impacts of noise. The increased overflight of designated landscapes will also disrupt the tranquillity that so many people enjoy when visiting green spaces such as Areas of Outstanding Natural Beauty. Single Event Noise exposure, and the frequency of that exposure, can cause significant community annoyance even if it does not exceed the 'average level of daytime aircraft noise' due to the tranquillity of rural areas.

Aviation noise may not be a statutory nuisance but that does not mean it does not cause substantial distress. It is proven that noise that disrupts sleep is the most damaging to health. Therefore, we would fully encourage restrictions on night noise, similar to those at Heathrow airport.

Q4 - Please identify any other areas, that are not necessarily local to you, that in your opinion may be sensitive to either direct overflight or exposure to aircraft noise?

Government policy states that, where possible, over-flight of densely populated areas should be avoided to minimise the number of people affected by aircraft noise; and where possible over-flight of areas of tranquillity should also be avoided.

Q5 - Do you believe aircraft conducting continuous climbs to altitude after taking off (where this is safe to do so) may reduce exposure to noise in your local area?

KCC recognises the potential improvements to the noise environment by the design of more fuel-efficient routes, faster climbs, quieter descents, and accurate navigation around populated areas; however, in some areas communities will not benefit. It is very possible that the South East is one of these areas, where demand for more flights from the country's busiest airports is growing in a densely populated region. This will make it nearly impossible that routes will be found that sufficiently avoid creating negative impacts for communities on the ground even with aircraft with the most enhanced capabilities, therefore airspace design should make provision for multiple routes that offer respite for affected communities.

Q6 - Please tell us the locations of any particularly sensitive wildlife habitats, not already notified (linked to Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) etc.) that you feel aircraft could avoid?

See response to Q1.

Q7 - Please state what principles you believe we can adopt to mitigate (in full or in part) regarding the impact of airliner exhaust fumes or pollution?

KCC considers that safety should be the highest design principle priority, however this should be closely followed by principles which focus on minimising and mitigating the environmental and community impacts of aircraft movements. Not only must the UK reach its climate change targets and address the problems of emissions, but any change should not come at the cost of local communities, many of whom are already significantly negatively impacted by the UK's aviation industry.

Q8 - Please bring to our attention any recent or ongoing local environmental studies you feel should be considered by RiverOak Strategic Partners when designing the new departure and approach procedures?

We recommend RiverOak Strategic Partners consults local air quality studies produced by the local district councils and reviews the ecological, noise and air pollution reports which will have been submitted as part of the Development Consent Order (DCO) for Manston Airport, along with any information submitted as part of any other planning applications within the surrounding area.

The impact on the flights on the designated sites due to nutrification should also be considered as part of this airspace change process.

Q9 - Are there any other local development projects, perhaps currently at the planning stage, that RiverOak Strategic Partners should be aware of and consider when planning Manston Airport's departure and approach procedures?

We would advise RiverOak Strategic Partners engages with local district councils; Thanet, Dover, Canterbury, and Medway Council in regard to planned developed within their Local Plans which should be considered when designing flight paths for the airport.

Furthermore, KCC continues to promote the delivery of Thanet Parkway Railway Station. As a long standing priority for the County Council within our Local Transport Plan, it is imperative departure and approach procedures do not impact on the operation of the railway station.

Q10 - Please list any other relevant local or national organisations that you believe RiverOak Strategic Partners should ensure are involved in public consultation.

Due to the increasing focus on climate change and environmentalism, especially within the aviation sector, it is imperative environmental organisations are consulted with. CPRE Kent, Kent Downs AONB, Historic England, Natural England and the Environment Agency should all be consulted with in order to provide feedback in regard to the environmental impacts.

We would also encourage RiverOak Strategic Partners to consult with other London airports who are undergoing the same airspace change process. Areas across Kent and the South East are heavily overflown by a number of airports and it is important each airspace change process is not looked at in silo but instead considers the cumulative impact on local communities and seeks to achieve deconfliction of flight paths.

Q11 - Please provide the location of any future planned facilities you are aware of in your local area that could be considered sensitive to the impact of aircraft noise; please state why you feel this is necessary.

KCC's Growth and Infrastructure Framework (GIF) outlines the infrastructure and requirements needed to accommodate planned growth within the County up until 2031. The full Framework can be found https://www.kent.gov.uk/_data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf

Q12 - We would be grateful for your views about how RiverOak Strategic Partners should balance the needs of airlines operating from Manston Airport against the needs of the local community.

Whilst KCC recognises that growth in the UK aviation sector will improve the country's connectivity and competitiveness, the Council is keen to ensure this growth is sustainably managed and impacts on local communities are minimised and appropriately mitigated. The benefits of growth should also be shared with communities through initiatives such as community funds and employment opportunities at the airport for local people.

Q13 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

KCC has continually recommended the use of Nx contours (rather than the usually-used Leq contours) when showing the noise impact of overflight because they better represent the number of noise events an overflown community will experience at a given volume rather than an average noise level for the day or night across a whole season. Given the potentially profound changes to currently not overflown communities, it is imperative that these alternative metrics are used by airspace change promoters to ensure that communities are fully aware of the implications.

The use of holding stacks should also be avoided where possible, and given the location of Manston Airport it would seem logical for routes to follow the coast as far as possible to avoid flying over settlements; and as much as possible limit overflight of protected landscape areas.

Organisation: Kent County Council Part 2

Indicative Route Swathes for Runway 28		
Facility	Type	Area
Monkton CEP School	School	Thanet
Minster CEP School	School	Thanet
Preston Primary School	School	Dover
Cartwright & Kelsey CEP School	School	Dover
Wingham Primary School	School	Dover
Eastry CEP School	School	Dover
Goodnestone CEP School	School	Dover
Northbourne CEP School	School	Dover
Eythorne Elvington Community Primary School	School	Dover
Langdon Primary School	School	Dover
Kingsdown & Ringwoud CEP School	School	Dover
The Downs CEP School	School	Dover
St Marys Catholic School	School	Dover
Deal Parochial CEP School	School	Dover
Chilton Academy Primary School	School	Thanet
Chatham & Clarendon Grammar School	School	Thanet
Christ Church CEJ School	School	Thanet
Ellington Infant School	School	Thanet
St Lawrence in Thanet C of E Junior School	School	Thanet
Newington Community Primary School & Nursery	School	Thanet
St Ethelberts Catholic Primary School	School	Thanet
Birchington CEP School	School	Thanet
High View Oast Care Home	Care Home	Canterbury
The Old Rectory Residential	Care Home	Canterbury
King Edward House	Care Home	Canterbury
Oakfield House Retirement Home	Care Home	Canterbury
Eastry House Care Home	Care Home	Sandwich
The Old Vicarage Residential Home	Care Home	Deal
Phoenix House	Care Home	Deal
Cana Care Home	Care Home	Dover
Beach House Care Home	Care Home	Deal
Glendale Lodge Residential Care Home	Care Home	Deal
Newlands Residential Home	Care Home	Deal
Bradfield Residential Home	Care Home	Deal
Wellington House Care Home	Care Home	Deal
Meadowside House Care Home	Care Home	Deal
Generals Meadow Care Home	Care Home	Deal
St Anselms Nursing Home	Care Home	Deal
Channel Lea Care Home	Care Home	Deal
Knoll Nursing Home	Care Home	Deal
The Laurels Care Home	Care Home	Deal
Fassaroe House	Care Home	Deal
60 Celtic Road	Care Home	Deal
Anro House Care Home	Care Home	Deal
Rose Farm House Care Home	Care Home	Ramsgate
Harley Villa Care Home	Care Home	Ramsgate
Wantsum Lodge Care Home	Care Home	Ramsgate
Ashdene House	Care Home	Ramsgate

Brenan House Residential Home	Care Home	Ramsgate
Rickleigh House Care Home	Care Home	Ramsgate
Elsworth Residential Home	Care Home	Ramsgate
Keele House Care Home	Care Home	Ramsgate
Bradford House Care Home	Care Home	Ramsgate
Montague House	Care Home	Ramsgate
Four Winds Residential Home	Care Home	Ramsgate
Rossetti Lodge	Care Home	Birchington
Kent Downs AONB	AONB	
Sandwich Bay to Hacklinge Marshes	SSSI	
Dover to Kingsdown Cliffs	SSSI	
Thanet Coast	SSSI	
Preston Marshes	SSSI	
Preston Marshes	Ancient Woodland	
Stodmarsh	SSSI	
Stodmarsh	National Nature Reserve	
Stodmarsh	Special Area of Conservation	
Nine Acrewood	Ancient Woodland	
Wenderton Hoath	Ancient Woodland	
Thanet Coast & Sandwich Bay	Ramsar Site	
Thanet Coast & Sandwich Bay	Special Protection Area	
Special Areas of Conservation (Coast)	SAC	

Indicative Route Swathes for Runway 10

Facility	Type	Area
Queen Victoria Hospital	Hospital	Herne Bay
Whitstable & Tankerton Hospital	Hospital	Whitstable
Graveney Primary School	School	Swale
Hernhill CEP School	School	Swale
Boughton-Under-Blean & Dunkirk Primary School	School	Swale
Queen Elizabeths Grammar School	School	Swale
St Mary of Charity C of E Primary School	School	Swale
Abbey School	School	Swale
Ospringe CEP School	School	Swale
Ethelbert Road Primary School	School	Swale
Davington Primary School	School	Swale
Bysing Wood Primary School	School	Swale
Luddenham School	School	Swale
Blean Primary School	School	Canterbury
Whitstable Community College	School	Canterbury
Joy Lane Primary School	School	Canterbury
Whitstable Junior School	School	Canterbury
St Alphege CEI School	School	Canterbury
Whitstable & Seasalter Endowed CEJ School	School	Canterbury
Westmeads Community Infant School	School	Canterbury
Swalecliffe Community Primary School	School	Canterbury
Hampton Primary School	School	Canterbury
Herne Bay Junior School	School	Canterbury
Herne Bay Infant School	School	Canterbury
St Mary's Catholic Primary School	School	Whitstable
St Nicholas at Wade CEP School	School	Thanet
Christ Church CEJ School	School	Thanet
Chilton Academy Primary School	School	Thanet
Harbledown Lodge	Care Home	Canterbury
Mill House Rest Home	Care Home	Faversham
Cooksditch House Nursing & Residential Home	Care Home	Faversham
Ashurst House	Care Home	Faversham
Carnalea Residential Home	Care Home	Faversham
Kent Autistic Trust	Care Home	Faversham
Osborne Court Care Home	Care Home	Faversham
Kiln Court Care Home	Care Home	Faversham
Maylands Care Home	Care Home	Whitstable
Ladesfield Care Home	Care Home	Whitstable
St Martins Care Home	Care Home	Whitstable
St George Residential Care Home	Care Home	Whitstable
The Whitstable Nursing Home	Care Home	Whitstable
Tralee Rest Home	Care Home	Whitstable
Cliff Dene Care Home	Care Home	Whitstable
MCCH Marine Parade Care Home	Care Home	Whitstable
Lyndhurst Rest Home	Care Home	Whitstable
Little Rest Nest Care Home	Care Home	Whitstable
St John's Home	Care Home	Whitstable
Fairmead Residential Home	Care Home	Whitstable

Chestfield House	Care Home	Whitstable
Resthaven Residential Home	Care Home	Herne Bay
Ashmore House	Care Home	Herne Bay
Tarrys Retirement Home	Care Home	Herne Bay
Seymour House Care Home	Care Home	Herne Bay
Wimbledon Care Home	Care Home	Herne Bay
Haydon-Mayer Care Home	Care Home	Herne Bay
HMT Care LTD	Care Home	Herne Bay
Conifers Care Home	Care Home	Herne Bay
Elliott House Care Home	Care Home	Herne Bay
Dalkeith Lodge Care Home	Care Home	Herne Bay
Kimberley Residential Home	Care Home	Herne Bay
Whitebirch Lodge Care Home	Care Home	Herne Bay
Spenser Road Care Home	Care Home	Herne Bay
Cedar Oaks Care Home	Care Home	Herne Bay
Dyzack Ltd Care Home	Care Home	Herne Bay
Sovereign House Care Home	Care Home	Herne Bay
Favorita House Care Home	Care Home	Herne Bay
The Grafton Care Home	Care Home	Herne Bay
Cumberland Care Home	Care Home	Herne Bay
Uplands House Care Home	Care Home	Herne Bay
Hailey Care Home	Care Home	Herne Bay
St Brelades Care Home	Care Home	Herne Bay
Riverndell Care Home	Care Home	Herne Bay
The Annexe & Laurel House Care Home	Care Home	Herne Bay
Oxenden House Care Home	Care Home	Herne Bay
St Peters Convent Care Home	Care Home	Herne Bay
St Benedicts Residential Nursing Home	Care Home	Herne Bay
Elsworth Residential Homes LTD	Care Home	Ramsgate
Brenan House Residential Home	Care Home	Ramsgate
Richleigh House Care Home	Care Home	Ramsgate
Wantsum Lodge Care Home	Care Home	Ramsgate
Harley Villa	Care Home	Ramsgate
Ashdene House Care Home	Care Home	Ramsgate
Rose Farm House Care Home	Care Home	Ramsgate
Thanet Coast	Special Areas of Conservation	
Thanet Coast & Sandwich Bay	Special Protection Area	
The Swale	Special Protection Area	
Thanet Coast & Sandwich Bay	Ramsar Site	
The Swale	Ramsar Site	
The Swale	SSSI	
West Blean and Thornden Woods	SSSI	
Church Woods	SSSI	
Thanet Coast	SSSI	
Ellenden Wood	SSSI	
Ellenden Wood	Ancient Woodland	
Convicts Shaw	Ancient Woodland	
Blean Wood	Ancient Woodland	
Marley Wood	Ancient Woodland	
Childs Forstal	Ancient Woodland	

Upper Wood	Ancient Woodland
The Rough	Ancient Woodland
Wey Street Farm Wood	Ancient Woodland
Kemsdale Wood	Ancient Woodland
Culmers Wood	Ancient Woodland
Clay Pits Wood	Ancient Woodland
Church Woods	Ancient Woodland
Church Woods	Nature Reserve
Seasalter Levels	Local Nature Reserves



MANSTON AIRPORT
AIRSPACE DESIGN AND PROCEDURES
DESIGN PRINCIPLES QUESTIONNAIRE
NOVEMBER 2019
CONSULTATION RESPONSE FROM
THE KENT DOWNS AONB UNIT

RESPONSE TO QUESTIONS 2,4,13

National planning policies are very clear that highest priority should be given to the conservation and enhancement of Areas of Outstanding Natural Beauty and the National Planning Policy Framework confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and their planning status. (Paragraph 11 footnote 6, and 172).

The status of AONBs has been enhanced through measures introduced in the Countryside and Rights of Way (CROW) Act 2000, (the Act) which gave greater support to their planning and management. Section 85 of the Act places a duty on all public bodies and statutory undertakers to 'have regard' to the 'purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.'

The Act also requires local authorities within an AONB to jointly prepare and publish an AONB Management Plan which must "formulate the policies for the management of the AONB and for carrying out their functions in relation to it". Accordingly, the first Kent Downs AONB Management Plan was published in April 2004. The [Kent Downs AONB Management Plan, Second Revision 2014 to 2019](#) has subsequently been adopted.

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

The Management Plan sets out policies for the conservation and enhancement of the AONB's natural beauty, landscape and scenic quality and tranquillity. Tranquillity covers noise, visual intrusion and inappropriate activity, and the loss of dark night skies. Aircraft activity impacts on all these elements but most particularly it is the noise impact that has potential to impact on tranquillity.

Central Government policy looks to 'limit and where possible reduce the number of people in the UK significantly affected by aircraft noise'. This has resulted in the routing of air traffic away from over-flying conurbations where they may have historically flown and over onto less populated areas, which in many cases are over protected landscapes of our National Parks and Areas of Outstanding Natural Beauty, designated, visited and appreciated for their special qualities including tranquillity.

These areas are typically subject to much quieter background noise than existing urban areas, where the presence of overflying aircraft will therefore be more apparent than in areas where the existing ambient noise levels are higher. Increased concentration of flight paths, if overflying the AONB could negatively impact on tranquillity of the AONB as well as being disruptive for sleep and health and well-being of residents. The importance of tranquillity to the local economy – in particular on tourism, an important element of the Kent Downs rural economy - should also not be underestimated. Access and enjoyment and support for the rural economy is part of the sustainable management of the AONB, and is also addressed in the Management Plan.

The Kent Downs AONB Unit is also concerned about air quality over the AONB, which is another component of natural beauty that affects biodiversity, landscape and the amenity of users and residents of the AONB.

The Kent Downs AONB lies approximately 18km to the southwest of Manston Airport. It is therefore considered that the Design Principles should recognise the impact airspace design can have on the Kent Downs AONB and seek to conserve and enhance the natural beauty of this nationally protected landscapes by avoiding as far as possible flight paths across the Kent Downs AONB.

████████████████████ Kent Downs AONB Unit

21/10/2019

Emailed to: Manstonairspace@communityrelations.co.uk

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Manston Airport Airspace Design and Procedures

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Please save your completed questionnaire and any other supporting documents and return them to us by Friday 15th November 2019 using your method of choice.

- Details of methods for return are listed in the 'How to Respond' section of the accompanying leaflet you will have received with this questionnaire.
- We thank you in advance for completing this questionnaire. Your comments will be considered in the development of a shortlist of Airspace Design Principles that we will share with you for further comment before they are finalised and submitted to the Civil Aviation Authority.
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**Please complete
the following
questions
overleaf:**

Question

Q1 - Please list any altitude constraints, together with your reasons, that you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures?

Your Response: Please See Q13

This is a submission from Kent Gliding Club

Q2 - Please inform us of the latest proposed timescales for any neighbouring airspace/procedure re-design projects?

Your Response: N/A

Q3 - Please advise us of any future requirements for coordination (particularly adjacent/contiguous routes) between Manston Airport and adjacent Air Navigation Service Provider (ANSP) units that should be considered during the development of the Design Principles, Design Options and when implementing the new Manston Airport departure and approach procedures?

Your Response: N/A

Q4 - Are there any aspects of CAA Airspace Modernisation Strategy (e.g. airway entry/exit points, existing planned or new handover points) that RiverOak Strategic Partners should take into account in the design of procedures? Please provide details.

Your Response: N/A

Q5 - Are you aware of anything in the CAA Airspace Modernisation Strategy that presents a risk or opportunity to Manston Airport procedure development? Please provide details.

Your Response N/A

Q6 - Have you previously had a Letter of Agreement or Memorandum of Understanding with the Operators of the 'previous' Manston Airport? If so, do you see this as an agreement that could influence the design of the Manston Airport departure and approach procedures? Please provide details.

Your Response: No

Q7 - Please let us know if there are any day or evening time constraints that you consider RiverOak Strategic Partners could take into account when designing its departure and approach procedures? Please provide details and reasons.

Your Response: N/A

Q8 - Please tell us if there are any other operational constraints that RiverOak Strategic Partners will need to consider when planning its new arrival and departure procedures?

Your Response: Please see Q13

Q9 - Please inform us of who you consider to be the other key local aviation stakeholders that you believe RiverOak Strategic Partners should engage with during the process of designing its new procedures? Please provide details and reasons.

Your Response: Channel Gliding Club, Waldershare Park A/F

Q10 - Please provide details of any constraints imposed by restricted operations in the area encompassed by Manston Airport flight operations (e.g. military operations, danger areas, restricted areas, route crossings, transit corridors, training areas etc.)?

Your Response: N/A

Q11 - Please provide details of any issues or constraints due to local helicopter operations that you believe may have an impact on Manston Airport's procedure design project?

Your Response: N/A

Q12 - Please provide details of any issues or constraints due to local General Aviation operations that you believe may have an impact on Manston Airport's departure and approach procedures?

Your Response:

Q13 - Please provide details of any constraints that may be occasioned by local gliding activities on Manston Airport's procedure design project.

Kent Gliding Club operates from Challock Airfield (EGKE) which is 6 miles NW of Ashford. We operate 7-days a week and our activities generate 5000 to 6000 movements a year. A significant proportion of these are training flights conducted below 2500ft (QNH) and within a 5-mile radius of EGKE. However, during the soaring season (April to September) many more flights are conducted from EGKE by experienced cross-country pilots operating up to the base of the TMA and venturing across all parts of Kent and East Sussex. Flights of over 500 Km further afield across the SE of England also take place when conditions allow.

We are encouraged by the British Gliding Association to use electronic conspicuity to assist effective lookout. FLARM equipment is fitted to a number of gliders and tugs operating from EGKE. Transponders are generally not fitted to our gliders due to insufficient power supplies.

We attended your focus group on 4th November and understood from your briefing that flights in and out of Manston that might pass over EGKE would do so in the TMA above 5500ft. We request that, if your proposed airspace redesign brings Manston bound traffic below 5500ft overhead EGKE, due consideration is given to routing such traffic to the West of EGKE above the existing lower (3500ft) part of the TMA.

Q14 - We would be grateful for any views you may wish to express regarding how RiverOak Strategic Partners should balance the needs of the airlines operating from Manston Airport against the needs of the local community.

Your Response:

Q15 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response:

Manston Airport Airspace Design and Procedures

Design Principles Questionnaire

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**Please complete
the following
questions
overleaf:**

Question

Q1 - Please list any altitude constraints, together with your reasons, that you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures?

Your Response: Not below 2,000 ft within 2 miles of Maypole Airfield. Note proximity of approach path over Herne Bay

Q2 - Please inform us of the latest proposed timescales for any neighbouring airspace/procedure re-design projects?

Your Response: None

Q3 - Please advise us of any future requirements for coordination (particularly adjacent/contiguous routes) between Manston Airport and adjacent Air Navigation Service Provider (ANSP) units that should be considered during the development of the Design Principles, Design Options and when implementing the new Manston Airport departure and approach procedures?

Your Response: None

Q4 - Are there any aspects of CAA Airspace Modernisation Strategy (e.g. airway entry/exit points, existing planned or new handover points) that RiverOak Strategic Partners should take into account in the design of procedures? Please provide details.

Your Response: Maypole Airfield operations

Q5 - Are you aware of anything in the CAA Airspace Modernisation Strategy that presents a risk or opportunity to Manston Airport procedure development? Please provide details.

Your Response No

Q6 - Have you previously had a Letter of Agreement or Memorandum of Understanding with the Operators of the 'previous' Manston Airport? If so, do you see this as an agreement that could influence the design of the Manston Airport departure and approach procedures? Please provide details.

Your Response: Yes. However, we need to start from new.

Q7 - Please let us know if there are any day or evening time constraints that you consider RiverOak Strategic Partners could take into account when designing its departure and approach procedures? Please provide details and reasons.

Your Response: 08:00 to dusk to avoid Maypole Airfield operations

Q8 - Please tell us if there are any other operational constraints that RiverOak Strategic Partners will need to consider when planning its new arrival and departure procedures?

Your Response: Proximity of Maypole Airfield circuit and departure points

Q9 - Please inform us of who you consider to be the other key local aviation stakeholders that you believe RiverOak Strategic Partners should engage with during the process of designing its new procedures? Please provide details and reasons.

Your Response: Maypole Airfield operators

Q10 - Please provide details of any constraints imposed by restricted operations in the area encompassed by Manston Airport flight operations (e.g. military operations, danger areas, restricted areas, route crossings, transit corridors, training areas etc.)?

Your Response: Maypole Airfield circuit

Q11 - Please provide details of any issues or constraints due to local helicopter operations that you believe may have an impact on Manston Airport's procedure design project?

Your Response: Helicopter operations around Maypole Airfield

Q12 - Please provide details of any issues or constraints due to local General Aviation operations that you believe may have an impact on Manston Airport's departure and approach procedures?

Your Response: Maypole Airfield operations

Q13 - Please provide details of any constraints that may be occasioned by local gliding activities on Manston Airport's procedure design project.

Your Response:

Q14 - We would be grateful for any views you may wish to express regarding how RiverOak Strategic Partners should balance the needs of the airlines operating from Manston Airport against the needs of the local community.

Your Response: Noise abatement

Q15 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response: Move approach path over Herne Bay further north

Manston Airport Airspace Design and Procedures

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Question

Q1 - Please list any altitude constraints, together with your reasons, that you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures?

Your Response: **The MOD has no comment.**

Q2 - Please inform us of the latest proposed timescales for any neighbouring airspace/procedure re-design projects?

Your Response: **The MOD has no comment.**

Q3 - Please advise us of any future requirements for coordination (particularly adjacent/contiguous routes) between Manston Airport and adjacent Air Navigation Service Provider (ANSP) units that should be considered during the development of the Design Principles, Design Options and when implementing the new Manston Airport departure and approach procedures?

Your Response: **The MOD has no comment.**

Q4 - Are there any aspects of CAA Airspace Modernisation Strategy (e.g. airway entry/exit points, existing planned or new handover points) that RiverOak Strategic Partners should take into account in the design of procedures? Please provide details.

Your Response: : **The MOD has no comment.**

Q5 - Are you aware of anything in the CAA Airspace Modernisation Strategy that presents a risk or opportunity to Manston Airport procedure development? Please provide details.

Your Response: **The MOD has no comment.**

Q6 - Have you previously had a Letter of Agreement or Memorandum of Understanding with the Operators of the 'previous' Manston Airport? If so, do you see this as an agreement that could influence the design of the Manston Airport departure and approach procedures? Please provide details.

Your Response: **Whilst the MOD does not foresee this as a requirement at this stage, as the ACP progresses, we will remain engaged to identify if any such agreements may be required and engage accordingly.**

Q7 - Please let us know if there are any day or evening time constraints that you consider RiverOak Strategic Partners could take into account when designing its departure and approach procedures? Please provide details and reasons.

Your Response: **The MOD has no comment.**

Q8 - Please tell us if there are any other operational constraints that RiverOak Strategic Partners will need to consider when planning its new arrival and departure procedures?

Your Response: **The MOD has no comment.**

Q9 - Please inform us of who you consider to be the other key local aviation stakeholders that you believe RiverOak Strategic Partners should engage with during the process of designing its new procedures? Please provide details and reasons.

Your Response: **The MOD has no comment.**

Q10 - Please provide details of any constraints imposed by restricted operations in the area encompassed by Manston Airport flight operations (e.g. military operations, danger areas, restricted areas, route crossings, transit corridors, training areas etc.)?

Your Response: **The following areas should be considered:**

D136 (Shoeburyness)

D138A-B-C-D (Shoeburyness)

Do44 (Lydd Ranges)

EGD141 (Hythe Ranges)

Q11 - Please provide details of any issues or constraints due to local helicopter operations that you believe may have an impact on Manston Airport's procedure design project?

Your Response: **The MOD foresee no issues or constraints however would wish to ensure access to airspace as required for both fixed wing and rotary aircraft as required to meet defence operational and training requirements.**

Q12 - Please provide details of any issues or constraints due to local General Aviation operations that you believe may have an impact on Manston Airport's departure and approach procedures?

Your Response: **The MOD has no comment.**

Q13 - Please provide details of any constraints that may be occasioned by local gliding activities on Manston Airport's procedure design project.

Your Response: **The MOD has no comment.**

Q14 - We would be grateful for any views you may wish to express regarding how RiverOak Strategic Partners should balance the needs of the airlines operating from Manston Airport against the needs of the local community.

Your Response: **The MOD has no comment.**

Q15 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response: **Airspace modernisation and future airspace design must consider and allow for MOD access to airspace in order to meet future defence requirements. The MOD welcomes continued engagement throughout the ACP process.**

Manston Airport Airspace Design and Procedures

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Question

Q1 - Please list the facilities in your local area that you believe would be most affected by aircraft noise (e.g. hospitals, schools, parks, hospices etc.)?

Your Response: The majority of Manston Airport lies within the Parish of Minster. The remaining area comprises farmland and dwellings. Most of the area has been accustomed to aircraft noise for many years hence there are no significant concerns about the affect.

Q2 - Please tell us if multiple routes that disperse noise across a greater number of households are more of a priority for you than a single route that concentrates noise along a track above a smaller number of households.

Your Response: Minimising noise and emissions take priority for most people over dispersal over a greater area.

Q3 - Please highlight your awareness of any particularly sensitive issues with aircraft noise over the early morning and late evening period.

Your Response: No specific issues as the area has lived with an airport for many years.

Q4 - Please identify any other areas, that are not necessarily local to you, that in your opinion may be sensitive to either direct overflight or exposure to aircraft noise?

Your Response: None

Q5 - Do you believe aircraft conducting continuous climbs to altitude after taking off (where this is safe to do so) may reduce exposure to noise in your local area?

Your Response No doubt this would help providing it does not increase emissions.

Q6 - Please tell us the locations of any particularly sensitive wildlife habitats, not already notified (linked to Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) etc.) that you feel aircraft could avoid?

Your Response:

Q7 - Please state what principles you believe we can adopt to mitigate (in full or in part) regarding the impact of airliner exhaust fumes or pollution?

Your Response:

Q8 - Please bring to our attention any recent or ongoing local environmental studies you feel should be considered by RiverOak Strategic Partners when designing the new departure and approach procedures?

Your Response:

Q9 - Are there any other local development projects, perhaps currently at the planning stage, that RiverOak Strategic Partners should be aware of and consider when planning Manston Airport's departure and approach procedures?

Your Response:

Q10 - Please list any other relevant local or national organisations that you believe RiverOak Strategic Partners should ensure are involved in public consultation.

Your Response:

Q11 - Please provide the location of any future planned facilities you are aware of in your local area that could be considered sensitive to the impact of aircraft noise; please state why you feel this is necessary.

Your Response:

Q12 - We would be grateful for your views about how RiverOak Strategic Partners should balance the needs of airlines operating from Manston Airport against the needs of the local community.

Your Response:

Q13 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response:

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overleaf:**

Question

Q1 - Please list any altitude constraints, together with your reasons, that you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures?

Your Response: NATS look forward to working with RiverOak strategic partners in developing the airspace which will interface with the Manston operation. We do not envisage changing the current dimensions of controlled airspace given the comments made so far.

Q2 - Please inform us of the latest proposed timescales for any neighbouring airspace/procedure re-design projects?

Your Response: RiverOak are already aware of the LAMP timescales through the FASI-S work.

Q3 - Please advise us of any future requirements for coordination (particularly adjacent/contiguous routes) between Manston Airport and adjacent Air Navigation Service Provider (ANSP) units that should be considered during the development of the Design Principles, Design Options and when implementing the new Manston Airport departure and approach procedures?

Your Response: As previously stated we look forward to working together to develop suitable procedures enabling a safe air traffic environment for all airspace users.

Q4 - Are there any aspects of CAA Airspace Modernisation Strategy (e.g. airway entry/exit points, existing planned or new handover points) that RiverOak Strategic Partners should take into account in the design of procedures? Please provide details.

Your Response: NATS believe that it is the responsibility of RiverOak Strategic Partners and its agents together to determine suitable positions for the structures mentioned. We will, of course, provide stakeholder feedback as part of the CAP1616 process.

Q5 - Are you aware of anything in the CAA Airspace Modernisation Strategy that presents a risk or opportunity to Manston Airport procedure development? Please provide details.

Your Response: NATS believe that RiverOak Strategic Partners and its agents should use the guidance contained in the CAA AMS when developing the airspace in order to maintain regulatory compliance.

Q6 - Have you previously had a Letter of Agreement or Memorandum of Understanding with the Operators of the 'previous' Manston Airport? If so, do you see this as an agreement that could influence the design of the Manston Airport departure and approach procedures? Please provide details.

Your Response: As per previous answers we are willing to work together to develop new procedures based on the airspace designs put forwards.

Q7 - Please let us know if there are any day or evening time constraints that you consider RiverOak Strategic Partners could take into account when designing its departure and approach procedures? Please provide details and reasons.

Your Response: NATS would like to understand the implications of the opening/closing times and planned traffic levels in order to ensure we have sufficient resources available to ensure a safe operation.

Q8 - Please tell us if there are any other operational constraints that RiverOak Strategic Partners will need to consider when planning its new arrival and departure procedures?

Your Response: No comment

Q9 - Please inform us of who you consider to be the other key local aviation stakeholders that you believe RiverOak Strategic Partners should engage with during the process of designing its new procedures? Please provide details and reasons.

Your Response: No comment

Q10 - Please provide details of any constraints imposed by restricted operations in the area encompassed by Manston Airport flight operations (e.g. military operations, danger areas, restricted areas, route crossings, transit corridors, training areas etc.)?

Your Response: No comment

Q11 - Please provide details of any issues or constraints due to local helicopter operations that you believe may have an impact on Manston Airport's procedure design project?

Your Response: No comment

Q12 - Please provide details of any issues or constraints due to local General Aviation operations that you believe may have an impact on Manston Airport's departure and approach procedures?

Your Response: No comment

Q13 - Please provide details of any constraints that may be occasioned by local gliding activities on Manston Airport's procedure design project.

Your Response: No comment

Q14 - We would be grateful for any views you may wish to express regarding how RiverOak Strategic Partners should balance the needs of the airlines operating from Manston Airport against the needs of the local community.

Your Response: NATS would like to suggest that RiverOak strategic partners investigate the benefits that the use of Performance Based Navigation can bring in terms of providing accurate flightpaths and therefore being able to move traffic away from areas of concern in the local community.

Q15 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response: No comment

Manston Airport Airspace Team
RiverOak Strategic Partners Ltd

[Redacted]
[Redacted]
[Redacted]

NATS

[Redacted]
[Redacted]
[Redacted]
[Redacted]

28th November 2019

Dear Sir/Madam,

Manston Airport Airspace Design Principles Engagement

Thank you for allowing NATS the opportunity to respond to your Design Principles Questionnaire in support of your airspace change proposal for Manston Airport. NATS look forward to working together with RiverOak Strategic Partners and its agents throughout the CAP 1616 process, and the wider programme of airspace modernisation, in order to make the change suitable for all stakeholders. We have enjoyed a positive, collaborative start to the process and look forward to continuing in that vein.

Our response to the questionnaire is attached, and we understand that the responses from all stakeholders will be used to derive the design principles. However we believe that there are some other considerations that weren't included in the questionnaire that need to be taken into account when creating your design principles.

NATS would suggest that the Design Principles that RiverOak Strategic Partners derive from the responses to this questionnaire fit within the following headlines:

- Safety – the highest priority
- Technical
- Regulatory
- Environmental
- Operational
- Economic
- Policy
- Implementation

We would also like to suggest that one specific Design Principle is given consideration, particularly with reference to the integrated nature of the wider programme of airspace modernisation.

Therefore we would suggest adding sufficient wording to cover the following;

- *Any design work undertaken will ultimately take into account the change in vertical reference caused by the transition altitude, particularly with interactions with other airports.*

With the rationale:

- *NATS will be responsible for the network design for arrivals and departures above 7000ft/FL70 with Manston Airport responsible for the routes to/from the ground, including interactions with adjacent airports and appropriate community engagement. However network route positions will be influenced to a large degree by the airports' requirements (geographically distilled into the Letterbox positions for each proposed route). These*

letterboxes/route positions will also be influenced by the Transition Altitude and any interactions between the routes of other airports.

We look forward to continuing to work together, along with the other airports and stakeholders in your process, in the wider programme of work that this airspace change is part of. Should you have any comments or questions then please do not hesitate in contacting me.

Kind regards

██████████
██

Manston Airport Airspace Design and Procedures

Design Principles Questionnaire

The questions below are designed to help RiverOak Strategic Partners (RSP) understand the constraints that should be considered during the Civil Aviation Authority's (CAA) CAP 1616 Design Principles process. For technical information on planned operations at Manston Airport, please refer to Appendix A – Technical Information on the Airspace Design Principles for Manston Airport, Manston Airport Instrument Flight Procedures.

Please insert your responses below to each of the following questions; the size of the response box will expand as you type your response. Use as much space as you need, or alternatively attach additional sheets or documents making it clear which questions you are responding to. Please do not feel constrained in your response to any question. If you wish to highlight any other relevant local constraints or issues, we would welcome any feedback that will support the development of the Airspace Design Principles. If any of the questions are not applicable or relevant, please say so against the appropriate question.

Please save your completed questionnaire and any other supporting documents and return them to us by Friday 15th November 2019 using your method of choice.

- Details of methods for return are listed in the 'How to Respond' section of the accompanying leaflet you will have received with this questionnaire.
- We thank you in advance for completing this questionnaire. Your comments will be considered in the development of a shortlist of Airspace Design Principles that we will share with you for further comment before they are finalised and submitted to the Civil Aviation Authority.
- Once the Airspace Design Principles are approved by the CAA following successful completion of the Stage 1 DEFINE gateway, they will be used as a framework for the development of Design Options proposals for airspace design and procedures that will be widely consulted on.

**Please complete
the following
questions
overleaf:**

Question

Q1 - Please list the facilities in your local area that you believe would be most affected by aircraft noise (e.g. hospitals, schools, parks, hospices etc.)?

Your Response:

Natural England does not wish to comment on this question.

Q2 - Please tell us if multiple routes that disperse noise across a greater number of households are more of a priority for you than a single route that concentrates noise along a track above a smaller number of households.

Your Response:

Natural England does not wish to comment on this question.

Q3 - Please highlight your awareness of any particularly sensitive issues with aircraft noise over the early morning and late evening period.

Your Response:

Natural England does not wish to comment on this question.

Q4 - Please identify any other areas, that are not necessarily local to you, that in your opinion may be sensitive to either direct overflight or exposure to aircraft noise?

Your Response:

Sensitive areas were identified in the DCO application documents.

Q5 - Do you believe aircraft conducting continuous climbs to altitude after taking off (where this is safe to do so) may reduce exposure to noise in your local area?

Your Response

Natural England does not wish to comment on this question.

Q6 - Please tell us the locations of any particularly sensitive wildlife habitats, not already notified (linked to Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) etc.) that you feel aircraft could avoid?

Your Response:

In our responses to the examination of the DCO, Natural England raised concerns regarding noise impacts on the birds for which the Thanet Coast and Sandwich Bay Special Protection Area (SPA) is designated. Noise modelling indicated that the northern part of Pegwell Bay would be most affected, where roosting turnstones are found. The Applicant put together a technical note covering this issue and setting out mitigation measures (attached to this consultation response for ease of reference). Natural England advised the Planning Inspectorate that there would be no adverse effect on the integrity of the SPA, under the Habitats Regulations, based on the assessment in that technical note, including that the flightpaths would be as set out in the examination documents. It is, therefore, a concern that this consultation appears to be allowing proposals for the flightpaths to be moved further towards Pegwell Bay.

If the flightpaths were to be moved, it would alter the assessments that were made during the DCO Examination, both in terms of impacts on ecology and people. If, as a result of this consultation, there is a proposal to move the flightpath closer to Pegwell Bay, the conclusions reached during the DCO Examination would no longer be valid. Natural England would then have to advise the Secretary of State that their Habitats Regulations Assessment could not rely on the noise modelling submitted into the DCO Examination, which would have to be re-done and the impacts on the SPA re-assessed.

Q7 - Please state what principles you believe we can adopt to mitigate (in full or in part) regarding the impact of airliner exhaust fumes or pollution?

Your Response:

Q8 - Please bring to our attention any recent or ongoing local environmental studies you feel should be considered by RiverOak Strategic Partners when designing the new departure and approach procedures?

Your Response:

Natural England's view is that the departure and approach procedures should follow the principles set out in the DCO application, otherwise the conclusions of the Environmental Impacts Assessment submitted cannot be relied upon. As set out in the Technical Note on Noise and Turnstones submitted into the DCO Examination, the disturbance studies by Kent Wildlife Trust should be taken into consideration.

Q9 - Are there any other local development projects, perhaps currently at the planning stage, that RiverOak Strategic Partners should be aware of and consider when planning Manston Airport's departure and approach procedures?

Your Response:

Natural England does not wish to comment on this question.

Q10 - Please list any other relevant local or national organisations that you believe RiverOak Strategic Partners should ensure are involved in public consultation.

Your Response:

Natural England does not wish to comment on this question.

Q11 - Please provide the location of any future planned facilities you are aware of in your local area that could be considered sensitive to the impact of aircraft noise; please state why you feel this is necessary.

Your Response:

Natural England does not wish to comment on this question.

Q12 - We would be grateful for your views about how RiverOak Strategic Partners should balance the needs of airlines operating from Manston Airport against the needs of the local community.

Your Response:

Natural England does not wish to comment on this question.

Q13 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response:

Natural England does not wish to comment on this question.

Manston Airport DCO: North Pegwell Bay: Noise and Turnstone

1. Background

Organisation: Natural England Part 2

This Technical Note provides an update on the issue of the potential for aircraft noise to affect turnstone, a qualification feature of the Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Ramsar site.

At Issue Specific Hearing 6 (ISH6) dealing with HRA matters (5 June 2019) Natural England stated they had a residual uncertainty in respect of the potential for aircraft noise to affect turnstone in Pegwell Bay. The Report to Inform the Appropriate Assessment issued at Deadline 7a (RIAA [REP7a-014]) had concluded that the species would not be affected and that there would be no adverse effect on site integrity. It was also acknowledged that NE and the Applicant are close to agreement however mitigation, probably in the form of a financial contribution towards an appropriate mitigation programme, would be required in the event that residual concerns cannot be resolved.

In terms of the substantive issue under discussion, during the winter turnstone regularly forage on the northern coastline of Pegwell Bay, part of the SPA/Ramsar, where noise levels of 70-75dB L_{Amax} are modelled to occur. These levels result only from flights departing east (so may only occur on 30% of the days in a given year) and will only be generated by the noisiest aircraft predicted to be operated in future (Boeing 747-400) and also planes classed as in the mid-range of noise generation (e.g. Boeing 737-800). Natural England's view was that due to exposure to these noise levels it could not be ruled out with certainty that turnstone would not react in a significant way to noise events generated by these departures. This could therefore undermine the conservation objectives of the SPA, specifically in the context of restoration of the turnstone population. That view is based solely on potential disturbance from noise and not from the visual stimulus of aircraft, as all planes will be sufficiently distant (i.e. above 500m in altitude and/or beyond 1km in lateral distance) to either have no or a negligible effect.

Given Natural England's residual uncertainty, mitigation was indicated as being required. As noted above, at ISH6 Natural England suggested that mitigation could be provided through a financial contribution by the Applicant to implementation of an appropriate project of the Thanet District Council's (TDC) Strategic Access Management and Monitoring Plan (SAMM) in respect of the Thanet section of the Thanet Coast and Sandwich Bay SPA¹. As both TDC or the Applicant were unaware of this suggestion prior to the Hearing, discussion amongst the parties has occurred subsequently. As a result of these discussions it has been determined that an appropriate project does not currently exist within the TDC SAMM to which a financial contribution could be made. Nonetheless the Applicant has offered to help fund a suitable project or projects, and if necessary to work with TDC and NE to ensure implementation on an appropriate timeline.

During the recent constructive post-Hearing discussions Natural England have brought to the attention of the Applicant information about mitigation embodied into operation of the airport when it was previously operational that reduced potential noise /disturbance impacts on SPA qualification species. The mitigation, which was deemed to be effective by Natural England when the airport was last in operation, was that the flight path for aircraft flight paths departing/arriving to/from the east was located around 1km to the north of Pegwell Bay. Natural England indicated that if the Applicant could show that the proposed flight paths were sufficiently similar to those used previously, this would be an acceptable approach to removing Natural

¹ Main Report. v1. April 2016. Prepared for Thanet District Council by Bayne, S (Blackwood Bayne Ltd) and Hyland, V. (V. Hyland Associates Ltd). <https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-DC-SAMM-MAIN-REPORT-Final-21st-April-2016.pdf>

England's uncertainty regarding noise and turnstone and allow them to concur with the conclusions of the RIAA [REP7a-014]. Their view was supported by the Pegwell Bay Bird Disturbance Study², undertaken over a two year period between January 2010 and December 2011 when the airport was previously operational, which did not report that flights from the airport were a cause of disturbance to the birds in Pegwell Bay.

This Technical Note provides the following information:

- Confirmation that the proposed flight paths when planes leave to the east over Ramsgate and arrive from the east over Ramsgate, will be sufficiently similar to those used when the airport was previously operational;
- Information showing that the fleet now proposed will comprise no planes louder than previously operated, with the majority quieter than previously used
- Confirmation that the loudest planes that previously operated from Manston Airport will now be banned via the Noise Mitigation Plan and Chapter 3 of Part II, Volume 1 of Annex 16 to the Convention on International Civil Aviation which prohibits certain aircraft from operating within European airspace.
- Confirmation that the assessment provided in the RIAA [REP07a-014] is still considered valid; and
- Support to projects and studies on disturbance in Pegwell Bay.

2. Information on flightpath and fleet mix

2.1 Former and proposed flightpaths

The proposed flight path swathes are shown in Figure 1, informed by Figure 4.4 of the RIAA. Although the precise flight paths are subject to approval under the Civil Aviation Authority airspace change process, the flight path indicated for planes leaving to the east over Ramsgate and arriving from the east over Ramsgate is unlikely to deviate significantly from that indicated on Figure 1. At this distance from the airport there is little scope for variation.

The flight path used to the east of the airport during the period when the airport was previously operational is superimposed onto the proposed flight paths figure included in the Application (see Figure 1). The flight path shown is very similar to the flight path previously used which, based on the feedback from Natural England, would not result in disturbance of turnstone in Pegwell Bay.

2.2 Fleet mix and flight numbers

In the last five-ten years of operation, there were approximately 1,000 freight and 1,000-1,500 passenger Air Traffic Movements annually to/from Manston (Tom Wilson, Viscount Aviation, pers. comm.).

The freight fleet operated from Manston in its last years of operation comprised almost entirely of Douglas DC8-62, Boeing 747-200 and Boeing 747-400 aircraft (Tom Wilson, Viscount Aviation, pers. comm.). Based on noise certification data for these aircraft types, the DC8-62 and Boeing 747-200, which comprised the

² Swandale, T and Waite, A. 2012. Pegwell Bay, Kent: Bird Disturbance Study 2010-2011. Kent Wildlife Trust, Maidstone.

majority of air transport movements, are noisier aircraft than any of the fleet proposed³ when the airport re-opens. The Boeing 747-400 was the quietest of the three.

The risk of the noisiest aircraft being operated in future is minimised by the Quota Count approach detailed in the Noise Mitigation Plan [REP8-004], and some models are now banned by EU Legislation. Neither the Boeing 747-200 nor the DC8-62 are Chapter 3 compliant unless fitted with 'hush kits' and as such they could not use Manton Airport unless they are significantly quieter than those that flew under the previous operation.

Despite the previous fleet mix comprising planes that are as, or more, noisy as the noisiest proposed for future use, at the time of the two year Pegwell Bay bird disturbance study, disturbance as a result of airport operations in the northern part of Pegwell Bay was not recorded.

The numbers of flights forecast were presented in Appendix 3.3 [APP-044] of Environmental Statement Chapter 3 [APP-033]. The number of flights in Year 2 would be approximately double the number of commercial flights previously operated, and numbers would increase to Year 20 as per the forecast. However, although more frequent, the fleet will comprise no planes louder than the quietest of the freight planes operated previously, and as indicated above, disturbance as result of airport operations in the northern part of Pegwell Bay was not recorded.

3. Assessment

The proposed take-off flight path to the east is sufficiently similar to that used when the airport was previously operational that, based on the feedback from Natural England, it can be concluded that adoption of this path would not result in adverse effects on turnstone. The fleet mix proposed comprises no planes louder than the quietest freight aircraft previously operated, with the majority quieter than previously used, which accords with the general trend of more modern planes being less noisy than older aircraft types. Therefore, as the previous operation of the airport was not reported to disturb birds, despite a forecast increase in the number of flights, it can also be concluded that future operation with a predominantly less noisy fleet will also not result in disturbance of the birds using Pegwell Bay.

This supports the previous assessment and conclusion presented in the RIAA [REP7a-014] as detailed below.

- During the noise monitoring undertaken by the Applicant at Pegwell Bay in February-May 2019⁴, peak noise levels exceeded 70 dB_{L_{Amax}} on average 10 times per hour from the northern Vantage (monitoring) Point, and exceeded 60 dB_{L_{Amax}}, 121 times per hour. Overall therefore, operation of the airport will result in a small number of additional noise events of a similar magnitude to those already occurring in the Bay;
- The Applicant's Bird Disturbance Study⁵ identified no occurrences where noise alone (i.e. arising from a disturbing source further than 500m from birds present) elicited a response in the birds present. Similar findings supporting this have been found from disturbance studies for other developments for example work undertaken by Jacobs⁶ for the recent Wylfa DCO examination.
- Although the noise modelling indicates that the area (at the base of West Cliff) frequented by turnstone will experience levels up to 75dB, the cliffs are likely to dampen the noise;

³ Appendix 3.3 [APP-044] of Environmental Statement Chapter 3 [APP-033] details the proposed fleet mix.

⁴ Appendix G of the RIAA [REP7a-014].

⁵ Appendix G of the RIAA [REP7a-014].

⁶ Jacobs (2018). Wylfa Newydd Project. *Addendum to Seabird Baseline Report: Disturbance Monitoring at Cemlyn Lagoon*. PINS Ref. EN01007, December 2018.

- The visual stimuli provided by aircraft can be further discounted due to distance and the presence of the cliffs;
- Research suggests that birds react to the presence of aircraft in flight if they are perceived to represent a threat (for example, their appearance and flight profile of the aircraft appears to be similar to that of an avian predator such as a peregrine). This may explain why low-flying helicopters, light aircraft and military jets often elicit a much more severe response in birds than higher flying commercial jets;
- Aircraft noise results in gradual increase and decrease in noise over a longer period than a sudden loud noise to which birds are far more sensitive;
- Flights will be infrequent with the predictability of flight paths again reducing the potential for disturbance, and the loudest planes make up a relatively small proportion of the forecast fleet and that only certain flight directions will occur on any one day;
- Results from the Pegwell Bay Waterbird Disturbance Survey in 2018/19 provide no evidence to indicate that the birds using Pegwell Bay, or the north Thanet coast, respond to the overflights of commercial jets, with only low flying helicopters and micro-lights eliciting a response from the combined visual and noise stimulus. It is however, acknowledged that the flight paths and altitudes of the commercial jets currently flying over or close to Pegwell Bay are different and higher respectively to those for the Proposed Development;
- There is no publicly available evidence suggesting that the conservation objectives of the SPA were impacted by aircraft noise whilst Manston Airport was operational. There is no historical evidence to suggest that turnstone were displaced from areas of Pegwell Bay close to the flight paths during the period when Manston airport was operational, and conversely, numbers of turnstone have declined since operation ceased (Hodgson, 2016⁷).

The proposed operation of Manston Airport will therefore not result in an adverse effect on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar.

4. Support to projects and studies on disturbance in Pegwell Bay

Despite the conclusion of no adverse effect presented above, the Applicant recognises that disturbance in Pegwell Bay is a key pressure on the SPA species present, and that this is the subject of on-going initiatives including:

- Implementation of the Strategic Access Management and Monitoring Plan (SAMM) by Thanet District Council. This plan seeks to reduce the pressure exerted on turnstone in the SPA by an increase in recreational pressure resulting from new residential development;
- Monitoring of levels of disturbance in Pegwell Bay by Kent Wildlife Trust.

The Applicant has concluded that no adverse effects would occur that would affect achievement of the conservation objectives of the SPA. Recent discussions have centred around an understanding that bird populations were not affected by disturbance when the airport was previously operating and the fact that quieter aircraft will use the airport under the current proposals. Nonetheless, following discussion with Natural England it is acknowledged that unforeseen circumstances (such as changes in the aircraft fleet mix)

⁷ Hodgson, I. (2016). *Thanet Coast Turnstone (Arenaria interpres) monitoring, January – February 2016*. Report to Natural England. Sandwich Bay Bird Observatory Trust, Sandwich.

could result in minor impacts on the conservation objectives of the SPA. In all likelihood the aircraft fleet mix will continue to become quieter however, as this is outside of the control of the Applicant, the following precautionary mitigation is proposed:

1. The noise mitigation plan secures a ban on certain noisier aircraft as well as placing an overall noise envelope and QC based limit on aircraft movement. Both of these factors will motivate the airport to accept quieter aircraft as both the QC measure as well as the noise envelope would be exceeded more rapidly if noisier aircraft use the airport.
2. The Applicant will, through a Section 106 agreement with Thanet District Council, provide a sum of £100,000 to be used to mitigate any impacts on bird populations in Pegwell Bay.
3. The first £20,000 of this sum will be used to support the current bird disturbance monitoring study being undertaken by Kent Wildlife Trust.
4. If it is found that the operation of the airport is affecting bird populations, the remaining sum will be made available to Kent Wildlife Trust (KWT), Thanet District Council (TDC) and Natural England (NE) (mechanism to be confirmed) to develop and support projects directly relevant to species affected by disturbance. This element will have two phases:
 - a. KWT, TDC and NE to develop mitigation plan (with support from the Applicant/Operator as appropriate)
 - b. Use of the remaining funds (£80,000) for implementation of mitigation schemes to assist with restoration measures for affected bird population. It is likely that this would involve measures such as access control to minimise human disturbance such as water sports and dog walking which already occur at locations such as West Cliffe.
5. KWT will also have access to the Community Trust Fund established through the noise mitigation plan. This fund makes available £50,000 per annum for community groups. It is administered by the Airport Consultative Committee which will allocate funding according to need on the basis of applications made by community groups or projects affected by noise.

Issued by**Approved by**

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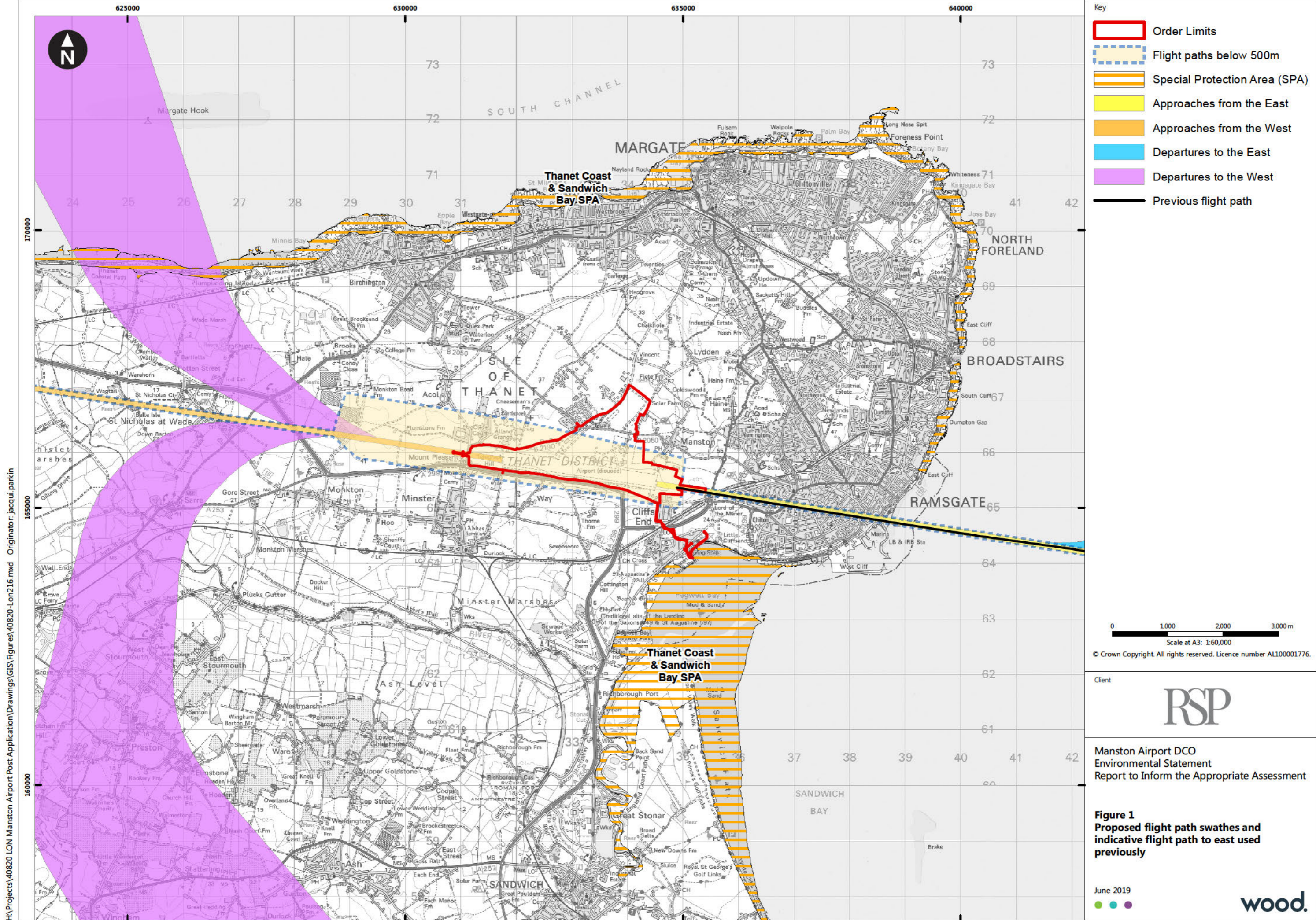
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- Key
- Order Limits
 - Flight paths below 500m
 - Special Protection Area (SPA)
 - Approaches from the East
 - Approaches from the West
 - Departures to the East
 - Departures to the West
 - Previous flight path

0 1000 2000 3000 m
 Scale at A3: 1:60,000
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Manston Airport DCO
 Environmental Statement
 Report to Inform the Appropriate Assessment

Figure 1
Proposed flight path swaths and
indicative flight path to east used
previously

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Manston Airport Airspace Design and Procedures

Design Principles Questionnaire

The questions below are designed to help RiverOak Strategic Partners (RSP) understand the constraints that should be considered during the Civil Aviation Authority's (CAA) CAP 1616 Design Principles process. For technical information on planned operations at Manston Airport, please refer to Appendix A – Technical Information on the Airspace Design Principles for Manston Airport, Manston Airport Instrument Flight Procedures.

Please insert your responses below to each of the following questions; the size of the response box will expand as you type your response. Use as much space as you need, or alternatively attach additional sheets or documents making it clear which questions you are responding to. Please do not feel constrained in your response to any question. If you wish to highlight any other relevant local constraints or issues, we would welcome any feedback that will support the development of the Airspace Design Principles. If any of the questions are not applicable or relevant, please say so against the appropriate question.

Please save your completed questionnaire and any other supporting documents and return them to us by Friday 15th November 2019 using your method of choice.

- Details of methods for return are listed in the 'How to Respond' section of the accompanying leaflet you will have received with this questionnaire.
- We thank you in advance for completing this questionnaire. Your comments will be considered in the development of a shortlist of Airspace Design Principles that we will share with you for further comment before they are finalised and submitted to the Civil Aviation Authority.
- Once the Airspace Design Principles are approved by the CAA following successful completion of the Stage 1 DEFINE gateway, they will be used as a framework for the development of Design Options proposals for airspace design and procedures that will be widely consulted on.

**Please complete
the following
questions
overleaf:**

Question

Q1 - Please list any altitude constraints, together with your reasons, that you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures?

Minimum airspace requirement, please. Already in Kent we are constrained by the airspace surrounding Southend and your proposals do not suggest that anything more is required than the regular ATZ (such as at Lydd, a comparable facility).

Q2 - Please inform us of the latest proposed timescales for any neighbouring airspace/procedure re-design projects?

Your Response.

Q3 - Please advise us of any future requirements for coordination (particularly adjacent/contiguous routes) between Manston Airport and adjacent Air Navigation Service Provider (ANSP) units that should be considered during the development of the Design Principles, Design Options and when implementing the new Manston Airport departure and approach procedures?

Q4 - Are there any aspects of CAA Airspace Modernisation Strategy (e.g. airway entry/exit points, existing planned or new handover points) that RiverOak Strategic Partners should take into account in the design of procedures? Please provide details.

The arrivals procedures for Runway 10 particularly are overhead Herne Bay and Maypole airfield. At sufficient height, this is not a problem, but if airspace is expanded to include this area, complaints will be numerous. Moreover, it would be better to route these further east, over less congested areas and away from Maypole

Q5 - Are you aware of anything in the CAA Airspace Modernisation Strategy that presents a risk or opportunity to Manston Airport procedure development? Please provide details.

Your Response

Q6 - Have you previously had a Letter of Agreement or Memorandum of Understanding with the Operators of the 'previous' Manston Airport? If so, do you see this as an agreement that could influence the design of the Manston Airport departure and approach procedures? Please provide details.

Your Response:

Q7 - Please let us know if there are any day or evening time constraints that you consider RiverOak Strategic Partners could take into account when designing its departure and approach procedures? Please provide details and reasons.

Q8 - Please tell us if there are any other operational constraints that RiverOak Strategic Partners will need to consider when planning its new arrival and departure procedures?

Maypole airfield EGHB operates autonomously and happily. As a responsible pilot I will respect your operations if you respect mine. The space between is sufficient; your ATZ as it was previously will work.

Q9 - Please inform us of who you consider to be the other key local aviation stakeholders that you believe RiverOak Strategic Partners should engage with during the process of designing its new procedures? Please provide details and reasons.

Maypole, Clipgate Farm, Solleys Farm, Waldershare Park.

Q10 - Please provide details of any constraints imposed by restricted operations in the area encompassed by Manston Airport flight operations (e.g. military operations, danger areas, restricted areas, route crossings, transit corridors, training areas etc.)?

With no distinct ATZ specified, it is impossible to say. If the ATZ returns to its previous status, no problem.

Q11 - Please provide details of any issues or constraints due to local helicopter operations that you believe may have an impact on Manston Airport's procedure design project?

Your Response:

Q12 - Please provide details of any issues or constraints due to local General Aviation operations that you believe may have an impact on Manston Airport's departure and approach procedures?

The arrivals procedures for Runway 10 particularly are overhead Herne Bay and Maypole airfield. At sufficient height, this is not a problem, but if airspace is expanded to include this area, complaints will be numerous. Moreover, it would be better to route these further east, over less congested areas and away from Maypole. Operations at Maypole endeavour to keep our neighbours happy by taking off and clearing the area in the most expeditious manner. Any alteration to this due to Manston operations will have a major impact.

Q13 - Please provide details of any constraints that may be occasioned by local gliding activities on Manston Airport's procedure design project.

Your Response:

Q14 - We would be grateful for any views you may wish to express regarding how RiverOak Strategic Partners should balance the needs of the airlines operating from Manston Airport against the needs of the local community.

Your Response:

Q15 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response: The KISS principle!

Manston Airport Airspace Design and Procedures

Design Principles Questionnaire

The questions below are designed to help RiverOak Strategic Partners (RSP) understand the constraints that should be considered during the Civil Aviation Authority's (CAA) CAP 1616 Design Principles process. For technical information on planned operations at Manston Airport, please refer to Appendix A – Technical Information on the Airspace Design Principles for Manston Airport, Manston Airport Instrument Flight Procedures.

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**Please complete
the following
questions
overleaf:**

Question

Q1 - Please list any altitude constraints, together with your reasons, that you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures?

Your Response: Clearly there is a cost to steep climb-outs, both in noise and fuel consumption, but not on descents. On Westerly departures and Easterly arrivals (especially if these are the preferred routing option forming 70% of movements), a minimum altitude of 2,000ft will avoid potential conflict with Maypole traffic and disturbance of the population of Herne Bay.

Q2 - Please inform us of the latest proposed timescales for any neighbouring airspace/procedure re-design projects?

Your Response: Not known

Q3 - Please advise us of any future requirements for coordination (particularly adjacent/contiguous routes) between Manston Airport and adjacent Air Navigation Service Provider (ANSP) units that should be considered during the development of the Design Principles, Design Options and when implementing the new Manston Airport departure and approach procedures?

Your Response: The proposed Easterly extension of Southend's Class D airspace will significantly affect operations to the North-East.

Q4 - Are there any aspects of CAA Airspace Modernisation Strategy (e.g. airway entry/exit points, existing planned or new handover points) that RiverOak Strategic Partners should take into account in the design of procedures? Please provide details.

Your Response: GNSS based PBN allows varied routing, but the ILS Cat 3 will be rigid – The latter gives certainty of likely conflict areas to class G users, and would be better for operations below 2,000ft

Q5 - Are you aware of anything in the CAA Airspace Modernisation Strategy that presents a risk or opportunity to Manston Airport procedure development? Please provide details.

Your Response No

Q6 - Have you previously had a Letter of Agreement or Memorandum of Understanding with the Operators of the 'previous' Manston Airport? If so, do you see this as an agreement that could influence the design of the Manston Airport departure and approach procedures? Please provide details.

Your Response: No

Q7 - Please let us know if there are any day or evening time constraints that you consider RiverOak Strategic Partners could take into account when designing its departure and approach procedures? Please provide details and reasons.

Your Response: Adherence to current proposals of 07.00 – 22.00 local time seems satisfactory.

Q8 - Please tell us if there are any other operational constraints that RiverOak Strategic Partners will need to consider when planning its new arrival and departure procedures?

Your Response: Aircraft climb profiles when fully laden need to be examined, with engine failure routes if adequate climb not possible to avoid potential conflict with Southend, Maypole and Waldershare traffic.

Q9 - Please inform us of who you consider to be the other key local aviation stakeholders that you believe RiverOak Strategic Partners should engage with during the process of designing its new procedures? Please provide details and reasons.

Your Response: Local GA airfields – Maypole, Rochester, Waldershare, Farthing Corner, Headcorn, as well as the obvious larger airports with dedicated Class D airspace.

Q10 - Please provide details of any constraints imposed by restricted operations in the area encompassed by Manston Airport flight operations (e.g. military operations, danger areas, restricted areas, route crossings, transit corridors, training areas etc.)?

Your Response: Training areas South / South West of Manston use class G up to 5,000ft for manoeuvring as restricted to 2,500 to the West which is too low for practice stalls / spins etc.

Q11 - Please provide details of any issues or constraints due to local helicopter operations that you believe may have an impact on Manston Airport's procedure design project?

Your Response: Not known

Q12 - Please provide details of any issues or constraints due to local General Aviation operations that you believe may have an impact on Manston Airport's departure and approach procedures?

Your Response: As already stated above, but repeated here for clarity, clearly there is a cost to steep climb-outs, both in noise and fuel consumption, but not on descents. On Westerly departures and Easterly arrivals (especially if these are the preferred routing option forming 70% of movements), a minimum altitude of 2,000ft will avoid potential conflict with Maypole traffic and disturbance of the population of Herne Bay. Local GA airfields – Maypole, Rochester, Waldershare, Farthing Corner, Headcorn, as well as an unmarked airfield at Alkham Valley close to the Dover TV aerial will all be in possible routings. GNSS based PBN allows varied routing, but the ILS Cat 3 will be rigid – The latter gives certainty of likely conflict areas to class G users, and would be better for operations below 2,000ft. Training areas South / South West of Manston use class G up to 5,000ft for manoeuvring as restricted to 2,500 to the West which is too low for practice stalls / spins etc.

Q13 - Please provide details of any constraints that may be occasioned by local gliding activities on Manston Airport's procedure design project.

Your Response: Waldershare is close to the South-Eastern arrival and departure routes and may be operational up to 5,000ft.

Q14 - We would be grateful for any views you may wish to express regarding how RiverOak Strategic Partners should balance the needs of the airlines operating from Manston Airport against the needs of the local community.

Your Response: Noise abatement areas should be considered, or preferred corridors for departure especially.

Q15 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response: Minimum altitude points on both arrivals and departures with specified vertical profiles and alternative routings when these cannot be complied with due to performance issues ? only allow operations with compliant aircraft types.

Manston Airport

Airspace Design and Procedures

Design Principles Questionnaire

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Question

Q1 - Please list the facilities in your local area that you believe would be most affected by aircraft noise (e.g. hospital schools, parks, hospices etc.)?

Your Response:

40,000 inhabitants of Ramsgate would suffer from aircraft noise, living directly on the proposed flight path, between 2 and 10 kilometres from the runway. Many of these living in Ramsgate's considerable Regency conservation areas, with numerous listed buildings impossible to soundproof effectively. Both noise and air pollution would exasperate the already poor health outcomes of many residents, with disproportionately high levels of heart/lung conditions. As previous experience of an airport at this site has shown, air turbulence and vibration would damage conservation area and listed buildings, and future airport safety zones would impact on building use and future development.

Many businesses in central Ramsgate and seafront, significantly dependent on tourist trade would suffer directly and/or indirectly through the impact of noise and pollution, resulting in loss of employment in an area where unemployment is already high. Ramsgate would become a less attractive as a place to live. Ongoing and significant regeneration, driven by the influx of house buyers with more disposable income, would be threatened. Economically, **any permission to overfly** Ramsgate would be disastrous. The effects on physical and mental health would be hugely detrimental in an area already with disproportionately negative health outcomes for its population. **The proposed freight hub is just too close to and the negative impact too great on a major centre of population, Ramsgate Town Centre, the Main Sands and Royal Harbour Marina are all directly on the proposed flight path.**

Please see attached sheet for list of facilities in Ramsgate that would be affected

Q2 - Please tell us if multiple routes that disperse noise across a greater number of households are more of a priority for you than a single route that concentrates noise along a track above a smaller number of households.

Your Response:

The proximity of Ramsgate to the proposed runway and location directly under any proposed approach path from the east does not allow multiple routes from or to that direction. Experience is that planes landing over Ramsgate created measured noise levels up to and in excess of 100 decibels, planes were regularly off the prescribed route, and were often still turning to align to the runway approach when already over the town and coastline.

Pretending that multiple routes would mitigate against the impact of a major airport in such close proximity to Ramsgate is disingenuous and dishonest. Any overflying of Ramsgate is unacceptable.

Q3 - Please highlight your awareness of any particularly sensitive issues with aircraft noise over the early morning and late evening period.

Your Response:

There should be absolutely no flying from 19:00 to 08:00

The 40,000 inhabitants of Ramsgate, with a disproportionate number of elderly and those with chronic health conditions, many with babies or young children, should not be inflicted with sleep disturbance in the early morning or late evening. It is now well researched and established that sleep disturbance is linked to negative and significant physical and mental health effects, particularly in the young, the elderly and the sick. The noise and pressure wave due to the height of over flying of Ramsgate induces dogs barking and car alarms adding the noise.

Q4 - Please identify any other areas, that are not necessarily local to you, that in your opinion may be sensitive to either direct overflight or exposure to aircraft noise?

Your Response:

North East Kent Marine Protected Area (NEKMPA) which includes the North East Kent European Marine Site (NEKEMS) and the more recent Marine Conservation Zone (MCZ). These sites are amongst some of the best wildlife sites in Europe.

Sandwich and Pegwell SSSI

Pegwell Nature reserve

Monkton Nature Reserve

Montefiore Woodland

The town of Herne Bay – 40,000 residents – and the villages to the west of the runway

Q5 - Do you believe aircraft conducting continuous climbs to altitude after taking off (where this is safe to do so) may reduce exposure to noise in your local area?

Your Response

Ramsgate is too close to the proposed runway for this to reduce noise exposure. It may in fact increase noise and increase safety concerns. Better to avoid overflying Ramsgate at all. (See Q2)

It is also essential to have airport policies which penalise noisier aircraft, as recommended by ICCAN (see: Question 12), and that facilitates are in place to accurately monitor actual noise generated, so that there is a high premium on use of more modern, and generally less noisy aircraft and a system of fines to penalise the worst offenders.

Q6 - Please tell us the locations of any particularly sensitive wildlife habitats, not already notified (linked to Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) etc.) that you feel aircraft could avoid?

Your Response:

See Q4

Q7 - Please state what principles you believe we can adopt to mitigate (in full or in part) regarding the impact of airliner exhaust fumes or pollution?

Your Response:

Mitigate is a poor choice of terms, unless it includes restricting choice of airliner allowed to only those that produce little or no exhaust fumes or pollution including unburnt fuel, combustion products, and particulates. **Any overflying of Ramsgate is detrimental and unacceptable.**

Q8 - Please bring to our attention any recent or ongoing local environmental studies you feel should be considered by RiverOak Strategic Partners when designing the new departure and approach procedures?

Your Response:

There have been many, many submissions made by Councils and residents to the ExA as part of the DCO process about the significant negative impact on Thanet and on parts of Canterbury district as a result of your proposals. These environmental studies must be given weight in this process of considering flight paths.

Q9 - Are there any other local development projects, perhaps currently at the planning stage, that RiverOak Strategic Partners should be aware of and consider when planning Manston Airport's departure and approach procedures?

Your Response:

There are considerably wind farms located offshore of the proposed freight hub and more planned with larger turbines. These have potential to disrupt radar facilities and increase safety concerns.

Q10 - Please list any other relevant local or national organisations that you believe RiverOak Strategic Partners should ensure are involved in public consultation.

Your Response:

KIACC (Kent International Airport Consultative Committee was the statutory body monitoring the airport before it closed. It still contains a wealth of information regarding Manston. Chairman [REDACTED]

MOD (Defence Infrastructure Organisation Safeguarding), Natural England, English Heritage

Historic England, Environment Agency, Campaign for the Preservation of Rural England

Royal Society for the Protection of Birds, Kent County Council, Kent Wildlife Trust

Herne Bay Labour Party, Thanet District Council

South Thanet Constituency Labour Party, Thanet Green Party, The Ramsgate Society

UKIP & Independent Group Thanet District Council Cliffsend Parish Council

Local Businesses

Albion House Hotel Ramsgate, Albion Place Heritage, Artist Partners, Benecare Ltd , Big jelly Studios Ltd , College of St John the Evangelist the University of Cambridge, Community artists Julia and Viv, East Kent Wellbeing, Elegantly Papered Limited, Five10Twelve Limited, Georgian Brickwork, Kai Toenjes Stringed Instruments, Kent Facilities Limited, Meditation by the Bay, Nethercourt Touring Park, Opensonics, PatrickGeorge Ltd, Pew Property (rental) Ltd, Ramsgate home Pilates, Sion House Management Company Ltd, TONIC Consultants Ltd, Way Forward, Wildman & Associates Limited

Resident Associations

Brockenhurst Road residents, Friends of Albion Place Gardens, Grange Road Residents, Guildford Lawn Residents, Harbour Towers Residents Association, Nelson Crescent Residents Association, Nethercourt Action Group, Pegwell & District Association, Plains of Waterloo Community Group, Reeds Close Community Group, Residents Against Night Flights, Residents of Ellington Road, Wellington Crescent Association

School Governing Bodies (see Question 1 for list of schools)

Other Interested Parties

Commuters Against The Cargo Hub, Holiday Homes Against Manston, Homeowners Against Manston Cargo Hub, Mums against Manston Airport, OAPs against a 24/7 freight Hub, PATCH - Plot holders Against The Cargo Hub, Ramsgate Town Team, Ramsgate Airport Sceptics, Ramsgate Coastal Community Team, Ramsgate Heritage and Design Forum, Ramsgate Neighbourhood Plan Group, Self-employed Against Manston Cargo Hub, Special Educational Needs Parents & Carers Against Manston, Teachers Against Manston Cargo Hub, The Ramsgate Society, Unrepresented Thanet residents against a cargo hub, Writers Against Manston Cargo Hub

Q11 - Please provide the location of any future planned facilities you are aware of in your local area that could be considered sensitive to the impact of aircraft noise; please state why you feel this is necessary.

Your Response:

Ramsgate town centre and sea front, both directly on the flight path, are nationally recognised areas of historic and cultural significance. There are currently four major grant-funded restoration schemes that would be **severely** impacted by overflying.

Ellington Park. (The National Lottery Parks for People Fund), The Future High Streets Fund. (DCMS)

The High Street Heritage Action Zone Scheme (DCMS and Historic England), The Heritage Horizon Awards (The National Lottery Heritage Fund)

Q12 - We would be grateful for your views about how RiverOak Strategic Partners should balance the needs of Manston Airport against the needs of the local community.

Your Response:

There should be no overflying of Ramsgate except in emergency.

We know from experience that whatever restrictions are imposed, they are sometimes less diligently followed either by the airport authority or individual airlines. It is important therefore that RSP or their agents that will be managing the freight hub, fund an independent body with full access to all relevant flight information – live tracking and properly recorded - and the ability to fine the freight hub management and/or individual airlines for any breaches.

See additional comment on separate sheet regarding the effect of wind conditions

Q13 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response:

Trust in RSP starts from a very low level, because the issue of night flights has been given different interpretations throughout the past three years, as well as what have appeared to be deliberate attempts to stifle opposition.

This means that RSP must work very hard to try and regain that trust and following ICCAN's advice would be a good start to that.

Hence the answer to this is “do not overfly Ramsgate”.

Otherwise in order to minimise the impacts, the airport must have very restricted operations, carefully chosen to minimise those impacts. Approaches and departures over Ramsgate should be restricted to emergencies only.

At existing airports, some expansion is possible as the aircraft become modernised and slight less noisy and less polluting, and sometimes with better flight management.

At Manston “balance” is impossible because it is not an existing airport and therefore all the noise and pollution are going to be highly intrusive.

Because of this, and because of the unique vulnerability of Ramsgate residents, there should be no overflying of residential areas during an extensive night-time period, no take-offs over Ramsgate, and landings restricted to emergencies only.

Additional facilities affected (Q1 continuation)

Secondary Schools

St Lawrence College, Royal Harbour Academy, Chatham and Clarendon Grammar School

Primary Schools

St Ethelbert's Catholic Primary School, Priory Infant School, Newlands Primary School, Ellington Infant School, St Laurence in Thanet C of E Junior, Ramsgate Holy Trinity C of E Primary School, Christchurch C of E Primary School, Ramsgate Free School, Chilton Primary School, Newington Community Primary School, Dame Janet Primary Academy

All of these would suffer disruption of lessons from noise, and restrictions on use of outside space due to noise and pollution.

Parks

King George VI park, Ellington Park, Nethercourt Park, Jackie Bakers Recreation Ground, Warre Recreation Ground, Boundary Road Recreation Ground

Various recreational spaces at Vale Square, Spencer Square, Government Acre, Albion Gardens, La Belle Alliance Square and Arklow Square.

Promenade gardens at Victoria Parade and Royal parade

Open Air Sports facilities

Ramsgate Football Ground, Ramsgate Croquet Club, Ramsgate Bowls Club, Thanet Bowls Club, St Lawrence Bowls Club

Use of Parks, Sports Facilities and Promenades would suffer due to noise and air pollution, they would suffer contamination due to deposition of fuel and combustion products.

Beaches

Ramsgate Main Sands, Westcliff Beach, Eastcliff Beach

Use of these would suffer due to noise and air pollution, they would suffer contamination due to deposition of fuel and combustion products.

Allotments

Chilton Lane East, Chilton Lane West, Cemetery Gates and Jacky Bakers Allotments would all suffer due to noise and air pollution; they would suffer contamination of produce due to deposition of fuel and combustion products.

Churches

Christchurch, St Lukes, St Laurence in Thanet (Grade I listed) ,Holy Trinity, St Augustine's, (Grade I listed), St Ethelbert's, Sailors Church (Grade I listed)

Saint George the Martyr (Grade I listed), Montefiore Synagogue (Grade II* listed)

All these churches, many Grade I or II* listed, would suffer from noise and turbulence from over flying

Listed Buildings

453 Listed buildings in Ramsgate, many of them lived in or open to the public attracting tourists would be threatened by noise and turbulence from over flying.

Medical Facilities, Dashwood Medical Centre, Eastcliff Practice, the Grange Practice Newington Road Surgery, Summerhill Surgery, Ramsgate Care Centre, the Grove rehabilitation unit' Thanet Mental Health Unit

All these will lose the tranquillity they currently enjoy because of overflying.

Constraints due to prevailing Wind Conditions (Q13 continuation)

At the engagement meeting we attended, two statements were made by the applicant and were not contradicted by the facilitator. These were, “That at least 70% of take offs and landings would be to and from the westerly (runway28) direction. This was stated to be because of the 1/. Prevailing wind conditions and modern aircraft could cope with up to 10 knots of tail wind.2/. because aircraft pilots could be directed to use a preferred route.

This assertion greatly influenced the discussion we attended, and we're told that it had the same effect on the other discussion that we couldn't attend.

Historical wind conditions at Manston are readily available, and are summarised at:

<https://weatherspark.com/y/147917/Average-Weather-at-Kent-International-Airport-United-Kingdom-Year-Round>

Wind

The average hourly wind speed at Kent International Airport experiences *significant* seasonal variation over the course of the year.

The *windier* part of the year lasts for *5.4 months*, from *October 6* to *March 17*, with average wind speeds of more than *14.9 miles per hour*. The *windiest* day of the year is *January 1*, with an average hourly wind speed of *18.4 miles per hour*.

The *calmer* time of year lasts for *6.6 months*, from *March 17* to *October 6*. The *calmest* day of the year is *July 28*, with an average hourly wind speed of *11.4 miles per hour*.

	Ja n	Fe b	Ma r	Ap r	Ma y	Ju n	Jul	Au g	Se p	Oc t	No v	De c
Average Wind Speed	18.4	16.7	14.9	13.1	12.5	11.8	11.4	12.1	13.7	14.9	16.7	17.7

The predominant average hourly wind direction at Kent International Airport varies throughout the year.

The wind is most often from the *north* for *1.1 months*, from *April 15* to *May 18*, with a peak percentage of *28%* on *April 27*. The wind is most often from the *west* for *11 months*, from *May 18* to *April 15*, with a peak percentage of *40%* on *January 1*.

Percentage prevailing wind direction each day of 2018

	N	N N E	N E	E N E	E	E S E	S E	S S E	S	S S W	S W	W S W	W	W N W	N W	N N W
2018	3.80	3.90	5.10	3.90	5.80	3.80	4.80	4.70	9.80	11.90	13.40	7.80	7.50	5.20	4.90	3.80

Because of the far-reaching impact on direction of inbound and outbound flights, we believe the applicant’s assertions greatly influenced all discussion at the engagement meetings. We question whether they are accurate regarding the type of aircraft likely to be delivering freight to and from Manston, or that pilots can be directed in the manner asserted.

Even if the assertions were accurate, the actual historical wind measurements do not support the conclusion drawn that 70% of all movements could be to and from the west, particularly landings. Previous experience was that landings were predominately from the east. Because of this we believe the engagement meetings are in great danger of being very misleading.

Manston Airport Airspace Design and Procedures

Design Principles Questionnaire

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questions
overleaf:**

Question

Q1 - Please list any altitude constraints, together with your reasons, that you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures?

Your Response: To be GA friendly.

Q2 - Please inform us of the latest proposed timescales for any neighbouring airspace/procedure re-design projects?

Your Response: Rochester Airport (EGTO) will be looking at RNAV/GPS approaches, no timescales proposed at present.

Q3 - Please advise us of any future requirements for coordination (particularly adjacent/contiguous routes) between Manston Airport and adjacent Air Navigation Service Provider (ANSP) units that should be considered during the development of the Design Principles, Design Options and when implementing the new Manston Airport departure and approach procedures?

Your Response: Southend, Rochester, Headcorn and Lydd.

Q4 - Are there any aspects of CAA Airspace Modernisation Strategy (e.g. airway entry/exit points, existing planned or new handover points) that RiverOak Strategic Partners should take into account in the design of procedures? Please provide details.

Your Response: As far as possible approaches from the North preferred.

Q5 - Are you aware of anything in the CAA Airspace Modernisation Strategy that presents a risk or opportunity to Manston Airport procedure development? Please provide details.

Your Response

Q6 - Have you previously had a Letter of Agreement or Memorandum of Understanding with the Operators of the 'previous' Manston Airport? If so, do you see this as an agreement that could influence the design of the Manston Airport departure and approach procedures? Please provide details.

Your Response: No.

Q7 - Please let us know if there are any day or evening time constraints that you consider RiverOak Strategic Partners could take into account when designing its departure and approach procedures? Please provide details and reasons.

Your Response:

Q8 - Please tell us if there are any other operational constraints that RiverOak Strategic Partners will need to consider when planning its new arrival and departure procedures?

Your Response: Maypole and possibly Eastchurch.

Q9 - Please inform us of who you consider to be the other key local aviation stakeholders that you believe RiverOak Strategic Partners should engage with during the process of designing its new procedures? Please provide details and reasons.

Your Response: Thames Radar, London City, Southend, Lydd, Maypole, Rochester, Headcorn, Clipgate, Pent Farm, Dover & Challock Gliding.

Q10 - Please provide details of any constraints imposed by restricted operations in the area encompassed by Manston Airport flight operations (e.g. military operations, danger areas, restricted areas, route crossings, transit corridors, training areas etc.)?

Your Response:

Q11 - Please provide details of any issues or constraints due to local helicopter operations that you believe may have an impact on Manston Airport's procedure design project?

Your Response: Remember to include them, also consider GA.

Q12 - Please provide details of any issues or constraints due to local General Aviation operations that you believe may have an impact on Manston Airport's departure and approach procedures?

Your Response: Maypole.

Q13 - Please provide details of any constraints that may be occasioned by local gliding activities on Manston Airport's procedure design project.

Your Response: Dover and Challock.

Q14 - We would be grateful for any views you may wish to express regarding how RiverOak Strategic Partners should balance the needs of the airlines operating from Manston Airport against the needs of the local community.

Your Response:

Q15 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response: Remember to be GA Friendly. Also, would there be any benefit in rationalising air-traffic between Manston – Lydd or even Southend?

Manston Airport

Airspace Design and Procedures

Design Principles Questionnaire

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Please complete
the following
questions
overleaf:

Question

Q1 - Please list the facilities in your local area that you believe would be most affected by aircraft noise (e.g. hospitals, schools, parks, hospices etc.)?

Your Response: Sutton Parish has three main villages which will be affected by aircraft noise if the departure route indicated is eventually adopted.

Q2 - Please tell us if multiple routes that disperse noise across a greater number of households are more of a priority for you than a single route that concentrates noise along a track above a smaller number of households.

Your Response: Sutton Parish Council would ask you to consider using the free airspace north of Manston Airport over the sea where noise pollution would not be an issue.

Q3 - Please highlight your awareness of any particularly sensitive issues with aircraft noise over the early morning and late evening period.

Your Response: Sutton Parish Council consider noise pollution in our area to be completely unnecessary when an obvious solution exists (Climb to the north over the sea).

Q4 - Please identify any other areas, that are not necessarily local to you, that in your opinion may be sensitive to either direct overflight or exposure to aircraft noise?

Your Response: No segment of the population will welcome noise pollution. Sutton Parish Council reiterate that a simple solution is available to avoid excessive noise pollution over the whole of East Kent.

Q5 - Do you believe aircraft conducting continuous climbs to altitude after taking off (where this is safe to do so) may reduce exposure to noise in your local area?

Your Response: The noise question relates more to the routing of the aircraft than the climb procedure.

Q6 - Please tell us the locations of any particularly sensitive wildlife habitats, not already notified (linked to Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) etc.) that you feel aircraft could avoid?

Your Response: Sutton Parish Council consider that the residents we represent are more likely to be affected than the landscape.

Q7 - Please state what principles you believe we can adopt to mitigate (in full or in part) regarding the impact of airliner exhaust fumes or pollution?

Your Response: Due to prevailing south westerly winds, climbs in the empty airspace over the Thames Estuary would take the exhaust and noise pollution away from the population of East Kent and disperse over the North Sea.

Q8 - Please bring to our attention any recent or ongoing local environmental studies you feel should be considered by RiverOak Strategic Partners when designing the new departure and approach procedures?

Your Response: Sutton Parish Council would again ask RSP to consider alternative departure routes which would protect the environment of East Kent.

Q9 - Are there any other local development projects, perhaps currently at the planning stage, that RiverOak Strategic Partners should be aware of and consider when planning Manston Airport's departure and approach procedures?

Your Response: East Kent in general is undergoing a process of house building well in excess of the national average. The proposed departure route will cause noise nuisance to many thousands of people. An alternative route is available and will mitigate most of the public concern.

Q10 - Please list any other relevant local or national organisations that you believe RiverOak Strategic Partners should ensure are involved in public consultation.

Your Response: The airspace above Sutton Parish is uncontrolled and used by Channel Gliding Club up to 7500ft. Although not in Sutton Parish, the white cliffs coastal area around St Margarets is particularly important to the Gliding Club as passenger flights contribute vital income for the upkeep of the club. Any restriction of the local airspace would impact on the viability of the gliding site.

Q11 - Please provide the location of any future planned facilities you are aware of in your local area that could be considered sensitive to the impact of aircraft noise; please state why you feel this is necessary.

Your Response: As East Kent is under pressure to provide extra housing well above the national average, noise pollution will affect more residents as new building projects come forward. Whitfield has proposed new housing in the local plan for more than 10000 new homes.

Q12 - We would be grateful for your views about how RiverOak Strategic Partners should balance the needs of airlines operating from Manston Airport against the needs of the local community.

Your Response: Sutton Parish Council hope that RSP will take into account the views of local residents and use the clear and unused airspace north east of Manston. A small amount of inconvenience to some flights would make all the difference to public opinion and support for the airport plans.

Q13 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response: Sutton Parish Council object to the current plans for Manston based on the noise pollution that would be created if the airspace plans go ahead. Utilisation of the airspace north east of Manston for aircraft climbing into airways is a solution which would be very welcome throughout East Kent.

Airspace Change Process: Stage 1B Questionnaire responses

Q1 - Please list the facilities in your local area that you believe would be most affected by aircraft noise (e.g. hospitals, schools, parks, hospices etc.)?

Your Response:

All primary schools in proximity to the airport and route swathes
All secondary schools in proximity to the airport and route swathes
All Special Educational needs facilities in proximity to the airport and route swathes
Any residential care institutions in proximity to the airport and route swathes
All caravan sites in proximity to the airport and route swathes
Designated wildlife and nature sites in proximity to the airport and route swathes
All public open space in proximity to the airport and route swathes

Q2 - Please tell us if multiple routes that disperse noise across a greater number of households are more of a priority for you than a single route that concentrates noise along a track above a smaller number of households.

Your Response:

Further detail is required before the Council can form a view, which has not been provided.

Q3 - Please highlight your awareness of any particularly sensitive issues with aircraft noise over the early morning and late evening period.

Your Response:

Impact on residential properties and institutions within Ramsgate, Acol, Minster, Manston, St Nicholas-on-Wade, Sarre, and the facilities identified above.

Please refer to Thanet District Council submission within the Nationally Significant Infrastructure Project process regarding aircraft noise, available here:

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipcsection=docs>

Q4 - Please identify any other areas, that are not necessarily local to you, that in your opinion may be sensitive to either direct overflight or exposure to aircraft noise?

Your Response:

See answer to question 3.

Sandwich Bay SAC
Sandwich and Pegwell Bay NNR
Sandwich Bay to Hacking Marshes SSSI
Thanet Coast and Sandwich Bay Ramsar Convention site
Thanet Coast and Sandwich Bay SPA
Thanet Coast SAC
Thanet Coast SSSI

Q5 - Do you believe aircraft conducting continuous climbs to altitude after taking off (where this is safe to do so) may reduce exposure to noise in your local area?

Your Response:

Further detail is required before the Council can form a view, which has not been provided.

Q6 - Please tell us the locations of any particularly sensitive wildlife habitats, not already notified (linked to Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI) etc.) that you feel aircraft could avoid?

Your Response:

Please refer to the question 4 and to the Natural England website for information about designated sites.

Q7 - Please state what principles you believe we can adopt to mitigate (in full or in part) regarding the impact of airliner exhaust fumes or pollution?

Your Response:

No information is provided regarding potential mitigation measures about the impact of airliner exhaust fumes or pollution, or measures in place at other operating airports.

All principles for mitigation and reducing pollution and emissions within the DEFRA Clean Air Strategy 2019 and Aviation 2050: the future of UK Aviation 2018 Green Paper should be considered for adoption.

Q8 - Please bring to our attention any recent or ongoing local environmental studies you feel should be considered by RiverOak Strategic Partners when designing the new departure and approach procedures?

Your Response:

Please contact Natural England, Kent Wildlife Trust and the Environment Agency regarding all environment studies being undertaken.

Canterbury City Council as part of the Strategic Management and Monitoring Plan (also operated by Thanet District Council) has commissioned survey work by Footprint Ecology, which is due to be published imminently.

Q9 - Are there any other local development projects, perhaps currently at the planning stage, that RiverOak Strategic Partners should be aware of and consider when planning Manston Airport's departure and approach procedures?

Your Response:

Please refer to all allocations within the emerging Thanet Local Plan to 2031, available here:

<https://www.thanet.gov.uk/info-pages/local-plan-updates/>

<https://www.thanet.gov.uk/wp-content/uploads/2019/10/Note-for-Inspector-on-5-year-land-survey.pdf>
<https://thanet.opus4.co.uk/planning/localplan/maps/thanet-local-plan>

Q10 - Please list any other relevant local or national organisations that you believe RiverOak Strategic Partners should ensure are involved in public consultation.

Your Response:

All Parish and Town Councils within the Thanet District.
All resident associations in urban and rural settlements within the Thanet District.
Natural England
Historic England
Environment Agency
Marine Maritime Organisation
Kent Wildlife Trust
NHS Thanet Clinical Commissioning Group
Public Health England
Kent County Council
Ramsgate Design and Heritage Forum.

Q11 - Please provide the location of any future planned facilities you are aware of in your local area that could be considered sensitive to the impact of aircraft noise; please state why you feel this is necessary.

Your Response:

Please refer to all allocated sites within the emerging Thanet Local Plan to 2031, available here:
<https://www.thanet.gov.uk/info-pages/local-plan-updates/>

Q12 - We would be grateful for your views about how RiverOak Strategic Partners should balance the needs of airlines operating from Manston Airport against the needs of the local community.

Your Response:

It is fundamental that the needs of the local community are prioritised above the needs of any airlines using Manston Airport. This should be the guiding principle in the formulation of route planning, departure and arrival times and all matters to be determined as part of the general operation of the airport.

Q13 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures?

Please provide details.

Your Response:

Please refer to all submissions of Thanet District Council and Kent County Council as part of the NSIP process available here:

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipcsection=docs>

This provides a full list of issues considered important which will impact on the procedures for departure and approach (including properties specifically affected and operating times).

Add in

Email to go with questionnaire. Send to airspace.policy@caa.co.uk as well as RSP

It is extremely disappointing that RSP are unwilling to engage in direct discussions at this early stage in the Airspace Design Process, and that a generic invitation to a workshop is considered sufficient to satisfy the requirements of CAP 1616. We have therefore provided limited answers to the questionnaire at this stage within the arbitrary deadline provided, and reserved our right to raise further matters through stage 1B and during subsequent stages of the Airspace change process.

We still hope that RSP will meaningfully engage with the District Council if the application progresses through the process.

Manston Airport Airspace Design and Procedures

Design Principles Questionnaire

The questions below are designed to help RiverOak Strategic Partners (RSP) understand the constraints that should be considered during the Civil Aviation Authority's (CAA) CAP 1616 Design Principles process. For technical information on planned operations at Manston Airport, please refer to Appendix A – Technical Information on the Airspace Design Principles for Manston Airport, Manston Airport Instrument Flight Procedures.

Please insert your responses below to each of the following questions; the size of the response box will expand as you type your response. Use as much space as you need, or alternatively attach additional sheets or documents making it clear which questions you are responding to. Please do not feel constrained in your response to any question. If you wish to highlight any other relevant local constraints or issues, we would welcome any feedback that will support the development of the Airspace Design Principles. If any of the questions are not applicable or relevant, please say so against the appropriate question.

Please save your completed questionnaire and any other supporting documents and return them to us by Friday 15th November 2019 using your method of choice.

- Details of methods for return are listed in the 'How to Respond' section of the accompanying leaflet you will have received with this questionnaire.
- We thank you in advance for completing this questionnaire. Your comments will be considered in the development of a shortlist of Airspace Design Principles that we will share with you for further comment before they are finalised and submitted to the Civil Aviation Authority.
- Once the Airspace Design Principles are approved by the CAA following successful completion of the Stage 1 DEFINE gateway, they will be used as a framework for the development of Design Options proposals for airspace design and procedures that will be widely consulted on.

**Please complete
the following
questions
overleaf:**

Question
<p>Q1 - Please list any altitude constraints, together with your reasons, that you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures?</p>
<p>Your Response: Approaches and departures should afford the steepest routing possible, commensurate with modern aircraft operating performance rather than accommodate types unable to achieve steeper profiles that should be prohibited from routinely operating from Manston. This achieves two benefits to two groups of people affected by Manston expansion. First, it will reduce noise levels at the surface (that may also allow more direct overland routing than would otherwise be the case). Second, it will reduce the surface size of any CTZ and increase the base height of any adjoining CTA volumes (thereby minimising the volume of airspace unavailable to non-Manston traffic without an ATC crossing clearance).</p>
<p>Q2 - Please inform us of the latest proposed timescales for any neighbouring airspace/procedure re-design projects?</p>
<p>Your Response: n/a as part of The Honourable Company of Air Pilots' response</p>
<p>Q3 - Please advise us of any future requirements for coordination (particularly adjacent/contiguous routes) between Manston Airport and adjacent Air Navigation Service Provider (ANSP) units that should be considered during the development of the Design Principles, Design Options and when implementing the new Manston Airport departure and approach procedures?</p>
<p>Your Response: n/a as part of The Honourable Company of Air Pilots' response</p>
<p>Q4 - Are there any aspects of CAA Airspace Modernisation Strategy (e.g. airway entry/exit points, existing planned or new handover points) that RiverOak Strategic Partners should take into account in the design of procedures? Please provide details.</p>
<p>Your Response: n/a as part of The Honourable Company of Air Pilots' response</p>
<p>Q5 - Are you aware of anything in the CAA Airspace Modernisation Strategy that presents a risk or opportunity to Manston Airport procedure development? Please provide details.</p>
<p>Your Response: There is major pressure for the strategy to move towards 'share safely,' rather than the historic 'segregate for safety' approach. Design principles should include the ability to achieve timely and straight forward hand-back of those parts of the airspace that are not being utilised. Thus, approach, go-round and departure airspace for the out-of-use runway that does not fall within that required for in-use runway procedures should be released for other users without the need for ATC approval.</p>
<p>Q6 - Have you previously had a Letter of Agreement or Memorandum of Understanding with the Operators of the 'previous' Manston Airport? If so, do you see this as an agreement that could influence the design of the Manston Airport departure and approach procedures? Please provide details.</p>
<p>Your Response: NO</p>

Q7 - Please let us know if there are any day or evening time constraints that you consider RiverOak Strategic Partners could take into account when designing its departure and approach procedures? Please provide details and reasons.

Your Response: n/a as part of The Honourable Company of Air Pilots' response

Q8 - Please tell us if there are any other operational constraints that RiverOak Strategic Partners will need to consider when planning its new arrival and departure procedures?

Your Response: Any airspace reserved for Manston operations becomes closed to other airspace users that are unable to arrange penetration or crossing approvals from the airport operator; in effect, granting Manston a specific volume of airspace has the effect of that volume becoming 'Manston's airspace.' However, as demand for airspace increases it is critical that airspace is recognised as a national resource.

Therefore, both airspace and procedure design must aim to address the needs of non-Manston as well as Manston air traffic, whether manned or un-manned; the design process and ANSP resource should examine and accommodate to the maximum extent it is safe to do so, the needs of all users.

Note that future airspace design will be expected to achieve safety through effective and efficient sharing of the air, not through allocating discrete blocks from which some aviation sectors are segregated. Therefore, the design principles must include the ability for timely and straight-forward hand back of those parts of the airspace that are not being used. Thus, approach, go-round and departure airspace sectors for the out-of-use runway could be made available to other users without the need for ATC approval.

Q9 - Please inform us of who you consider to be the other key local aviation stakeholders that you believe RiverOak Strategic Partners should engage with during the process of designing its new procedures? Please provide details and reasons.

Your Response: Stakeholders will include General Aviation pilots currently flying in the area, including those based in the local area and further away. Local fliers may be contacted through their flying clubs but the needs of those further away should be gathered through the national representative bodies – such as GA Alliance, etc. Engaging realistically with General Aviation as well as the commercial entities that may operate from Manston will ensure that any design meets the 'sharing safely' challenge rather than enforcing a 'segregation solution' that will meet significant opposition and need much more time to progress.

Q10 - Please provide details of any constraints imposed by restricted operations in the area encompassed by Manston Airport flight operations (e.g. military operations, danger areas, restricted areas, route crossings, transit corridors, training areas etc.)?

Your Response: n/a as part of The Honourable Company of Air Pilots' response

Q11 - Please provide details of any issues or constraints due to local helicopter operations that you believe may have an impact on Manston Airport's procedure design project?

Your Response: n/a as part of The Honourable Company of Air Pilots' response

Q12 - Please provide details of any issues or constraints due to local General Aviation operations that you believe may have an impact on Manston Airport's departure and approach procedures?

Your Response: RSP should be proactive in approaching all the local flying clubs and national representative bodies as early as possible.

Q13 - Please provide details of any constraints that may be occasioned by local gliding activities on Manston Airport's procedure design project.

Your Response: RSP should be proactive in approaching all the local gliding clubs and national representative bodies as early as possible.

Q14 - We would be grateful for any views you may wish to express regarding how RiverOak Strategic Partners should balance the needs of the airlines operating from Manston Airport against the needs of the local community.

Your Response: RSP needs to see this as a three-way balance, because there are three separate groups of stakeholders, the airlines, the local community on the ground and those that make up the other aviation segments. The first will be concerned primarily with noise and emissions, the second with safe and efficient operations and the third with ensuring that Manston does not export or increase safety risk into their own operations, as would be the case if General Aviation activity was (e.g.) forced into high-density corridors around the periphery of Manston's procedures or into extended over-water tracks.

Q15 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response: The Thames Estuary, North Sea and English Channel pose a safety threat and planning constraint for some aviation sectors but almost none to Commercial Air Transport and any change must not increase the safety risk of one sector simply to the commercial benefit of another. Members of The Honourable Company of Air Pilots come from all sectors of aviation, including Commercial Air Transport, General Aviation and commercial unmanned air operations. Manston is well-placed to be able to consider, balance and accommodate the needs of all sectors in this development and we encourage it to do so at every step of the development process. Where Commercial Air Transport needs segregated airspace, the ANSP should ensure that ATC staffing is maintained at/supplemented to the level that ensures other air users safe and unencumbered access through the segregated airspace volume. Post implementation, the CAA should review whether the ANSP meets that requirement and withdraw allocated airspace where it does not.

Manston Airport Airspace Design and Procedures

Design Principles Questionnaire

The questions below are designed to help RiverOak Strategic Partners (RSP) understand the constraints that should be considered during the Civil Aviation Authority's (CAA) CAP 1616 Design Principles process. For technical information on planned operations at Manston Airport, please refer to Appendix A – Technical Information on the Airspace Design Principles for Manston Airport, Manston Airport Instrument Flight Procedures.

Please insert your responses below to each of the following questions; the size of the response box will expand as you type your response. Use as much space as you need, or alternatively attach additional sheets or documents making it clear which questions you are responding to. Please do not feel constrained in your response to any question. If you wish to highlight any other relevant local constraints or issues, we would welcome any feedback that will support the development of the Airspace Design Principles. If any of the questions are not applicable or relevant, please say so against the appropriate question.

Please save your completed questionnaire and any other supporting documents and return them to us by Friday 15th November 2019 using your method of choice.

- Details of methods for return are listed in the 'How to Respond' section of the accompanying leaflet you will have received with this questionnaire.
- We thank you in advance for completing this questionnaire. Your comments will be considered in the development of a shortlist of Airspace Design Principles that we will share with you for further comment before they are finalised and submitted to the Civil Aviation Authority.
- Once the Airspace Design Principles are approved by the CAA following successful completion of the Stage 1 DEFINE gateway, they will be used as a framework for the development of Design Options proposals for airspace design and procedures that will be widely consulted on.

**Please complete
the following
questions
overleaf:**

Question

Q1 - Please list any altitude constraints, together with your reasons, that you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures?

Your Response: All new routes into and out of Manston must integrate with the other airports in the southeast of England, in particular London Heathrow and London Gatwick.

Q2 - Please inform us of the latest proposed timescales for any neighbouring airspace/procedure re-design projects?

Your Response: Reference must be made to the proposed modernisation of airspace in the southeast of England, including proposals being put forward by the applicable neighbouring airports.

Q3 - Please advise us of any future requirements for coordination (particularly adjacent/contiguous routes) between Manston Airport and adjacent Air Navigation Service Provider (ANSP) units that should be considered during the development of the Design Principles, Design Options and when implementing the new Manston Airport departure and approach procedures?

Your Response: Please see answers to questions 1 & 2 above.

Q4 - Are there any aspects of CAA Airspace Modernisation Strategy (e.g. airway entry/exit points, existing planned or new handover points) that RiverOak Strategic Partners should take into account in the design of procedures? Please provide details.

Your Response: It will be essential to ensure that the plans for Manston are fully integrated with plans being developed by NATS and the nearby airports for the airspace modernisation programme.

Q5 - Are you aware of anything in the CAA Airspace Modernisation Strategy that presents a risk or opportunity to Manston Airport procedure development? Please provide details.

Your Response: No.

Q6 - Have you previously had a Letter of Agreement or Memorandum of Understanding with the Operators of the 'previous' Manston Airport? If so, do you see this as an agreement that could influence the design of the Manston Airport departure and approach procedures? Please provide details.

Your Response: No.

Q7 - Please let us know if there are any day or evening time constraints that you consider RiverOak Strategic Partners could take into account when designing its departure and approach procedures? Please provide details and reasons.

Your Response: This will be down to the airport operator to develop, in cooperation with their customers and local community.

Q8 - Please tell us if there are any other operational constraints that RiverOak Strategic Partners will need to consider when planning its new arrival and departure procedures?

Your Response: None known.

Q9 - Please inform us of who you consider to be the other key local aviation stakeholders that you believe RiverOak Strategic Partners should engage with during the process of designing its new procedures? Please provide details and reasons.

Your Response: Other airports in the southeast of England and NATS.

Q10 - Please provide details of any constraints imposed by restricted operations in the area encompassed by Manston Airport flight operations (e.g. military operations, danger areas, restricted areas, route crossings, transit corridors, training areas etc.)?

Your Response: None known.

Q11 - Please provide details of any issues or constraints due to local helicopter operations that you believe may have an impact on Manston Airport's procedure design project?

Your Response: None known.

Q12 - Please provide details of any issues or constraints due to local General Aviation operations that you believe may have an impact on Manston Airport's departure and approach procedures?

Your Response: None known.

Q13 - Please provide details of any constraints that may be occasioned by local gliding activities on Manston Airport's procedure design project.

Your Response: None known.

Q14 - We would be grateful for any views you may wish to express regarding how RiverOak Strategic Partners should balance the needs of the airlines operating from Manston Airport against the needs of the local community.

Your Response: This will be part of the plan to open the airport. The customer airlines will need to develop their operating and commercial plans to ensure a viable operation at Manston. The airport operator will need to consider these plans, alongside those reasonable demands of the local community.

Q15 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Your Response: None known.

Extract from the concluding evidence to the Planning enquiry originally submitted by Ramsgate Town Council and with added comments from Walmer Parish Council.

Walmer Parish Council has looked at the evidence from Riveroak Strategic Partners and the National Planning Policy Guidelines and concludes that the evidence submitted by Ramsgate Town Council is both compelling and prescient in enunciating the concerns regarding noise, congestion and climate change.

The following conclusions were drawn by the RTC document:

- ❖ **RSP have not made the case for being granted a DCO for the purposes of reopening the airport.**
- ❖ **RSP have not demonstrated sufficient evidence to suggest that Manston airfield is an important part of the national infrastructure.**

***Comment:** The NPPF requires that policy making should have regard to sustainability and climate change. How does this air freight proposal which can be carried by other means (Sea, Rail and by existing passenger and air freight hubs) add to sustainability and reduce fossil fuel consumption? Is sending HGV's on a 200-mile round trip (as a minimum distance) sustainable when the alternatives are located near freight hubs in London and the E.Midlands?*

- ❖ **RSP have not demonstrated a compelling and viable business case for reopening Manston airport.**

***Comment:** Is it realistic to believe that Manston, can from a situation of no viable infrastructure being available on site, to challenge and even surpass E.Midlands airport, which is located on a major motorway and is located near various freight terminals and warehousing?*

E.Midlands has had continued investment programme and has pursued a policy of steady growth. Manston on the other hand has had the benefit of some the UK's leading airport operators (Infratil) and experts to operate and or survey the site and yet it has failed to thrive or find a lucrative niche in any air transport market, be it passenger, freight, business or engineering. There must be a reason why this is so and location would seem the likeliest cause? Manston is too remote and has too small a captive market.

- ❖ **RSP have not demonstrated adequate proof of its financial bona fides and by insisting on commercial confidentiality, has instead shown insufficient transparency to justify the granting of a DCO by the secretary of state.**

***Comment:** WPC has no comment to add to this conclusion but asks that the Secretary of State apply a precautionary principal, even if he/she is minded to grant the DCO.*

- ❖ **RSP's plans for noise mitigation are inadequate.**
- ❖ **RSP's evidence on environmental issues are weak and lacking sufficient substance.**
- ❖ **The lack of attention to connectivity within this application is also a major weakness, but again RTC is content to leave it to the other concerned organisations to argue this point. Thanet's transport infrastructure is particularly poor, and the addition of an airport only makes the situation worse.**

Comment: WPC holds that on the evidence presented by RSP and given critical analysis by RTC, there is sufficient cause to believe that the noise mitigation methods proposed are neither effective nor widespread enough. Very little has been said about noise and pollution being distributed across Pegwell Bay and Sandwich Bay in particular. Evidence is emerging about the Westward drift of pollution from Europe and down the coast from the Thames Estuary; any airfreight operation can only add to this pollution. Noise pollution may also be a concern in that the background noise levels may be increased.

RTC refers to the lack of connectivity and the imposition of operations Fennel and Brock by Highways England and Kent County Council, highlights the significant shortcomings in connecting any sort of air freight operation with the hinterland of the UK. The laissez-faire use of what are rural byways, will not be adequate to prevent substantial congestion blackspots occurring in East Kent. If RSP are serious about its plans for Manston, then a significant infrastructure investment has to be made prior to any operation starting and not afterwards as some kind of mitigation.

- ❖ **RTC holds that the Nethercourt residents and other groups concerned with the granting of the DCO have delivered sufficient evidence to suggest that RSP have not made the case to justify the granting of a DCO to overreach the substantial economic, social and environmental reasons, to refuse this application in the interests of the community, which is most affected by this application.**
- ❖ **Ramsgate Town Council has found this whole process highly divisive and has created polarised social groupings, who will have to reconcile their differences with each other, whether or not this application succeeds and fails. RSP has been extremely careless of community cohesiveness and somewhat intolerant of dissent. Even if by some mischance, the application is granted, the damage to community cohesiveness and the general wellbeing of Ramsgate and Thanet in the last 5 years, is nothing short of catastrophic for a community facing severe economic challenges.**
- ❖ **Finally, only the RSP DCO application is under examination here and it is not reasonable to justify the DCO, because of a dislike of the planning application from SHP. Whatever the merits or demerits of the SHP proposals may be; they will be dealt with by a separate process and the examination should not involve itself with a separate planning matter.**

Comment: *WPC has no comment to the above items as they refer to Ramsgate based concerns but notes RTC's comments with concern.*

Organisation: Non-invitee feedback

MANSTON AIRPORT AIRSPACE DESIGN AND PROCEDURES

DESIGN PRINCIPLES QUESTIONNAIRE

Q1 - Please list any altitude constraints, together with your reasons, that you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures?

Q4 - Are there any aspects of CAA Airspace Modernisation Strategy (e.g. airway entry/exit points, existing planned or new handover points) that RiverOak Strategic Partners should take into account in the design of procedures? Please provide details.

Response to Question 1 and Question 4

WE SAY:

RIVEROAK should consider the viability of their proposed airspace design given the low altitude constraints. Overflying Ramsgate is simply not acceptable.

SUMMARY RATIONALE:

RIVEROAK has proposed Runway 28 Easterly arrivals from the North **and** Runway 10 Easterly departures to the North to combine to form a thin flight swathe directly over Ramsgate (the “**Combined Ramsgate Flight Swathe**”). The area under the Combined Ramsgate Flight Swathe is *large and densely* populated which will entail aircraft overflying residents and public spaces, including the Town Centre and schools, at altitudes of 200-600 feet¹.

Given the very low altitude constraints it is not feasible, safe or reasonable for flights to approach or depart from the East along the Combined Ramsgate Flight Swathe, with all the inherent noise exposure, air pollution, safety risks for such a large and densely-populated area that this would entail. It is of note this is also a population *new* to aviation noise. The former airport has been safe-guarded by

¹ Altitudes- Ramsgate Sheet 1

the Department of Transport as a lorry park for almost 5 years with plans for this to continue.

Further, use of the airspace over Ramsgate at such a low altitude will have a negative impact on the economic growth of Ramsgate and the wider Thanet which has been well documented by Ramsgate Town Council², Ramsgate Town Team³, Ramsgate Neighbourhood Plan Steering Group⁴, Ramsgate Society⁵, Kent

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004187-AS%20-%20Ramsgate%20Town%20Council%20.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003390-Ramsgate%20Town%20Council%20-%20Written%20Representation.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003391-Ramsgate%20Town%20Council%20-%20Appendix%2010%20-%20WHO%202011%20Burden%20of%20Disease%20from%20Environmental%20Noise.pdf>

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-002883-Richard%20Styles_Ramsgate%20Town%20Council_Oral%20rep%20in%20writing.pdf

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004578-Ramsgate%20Town%20Team%20-%20Manston%20RTT%20submission%20Deadline%209%20280619.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004359-AS%20-%20Ramsgate%20Town%20Team%20Deadline%208%20Submission%20130619.pdf>

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003290-Ramsgate%20Neighbourhood%20Plan%20Group%20-%20Written%20Representation.pdf>

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004684-The%20Ramsgate%20Society%20-%20Ramsgate%20Heritage%20Assets%20under%20Threat%20vfinal.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003636-The%20Ramsgate%20Society%20and%20The%20Ramsgate%20Heritage%20and%20Design%20Forum%20-%20Response%20to%20Deadline%204.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003647-The%20Ramsgate%20Society%20-%20Comments%20on%20response%20to%20the%20Examining%20Authority%E2%80%99s%20First%20Written%20Questions%20-%20Historic%20Environment.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003648-The%20Ramsgate%20Society%20-%20Comments%20on%20Historic%20England%E2%80%99s%20Written%20Representation%20to%20the%20Examining%20Authority.pdf>

County Council⁶, Thanet District Council⁷ and many other businesses⁸ and campaigners and community groups throughout the recent UK Planning Inspectorate Development Consent Order (DCO) Examination.

MORE DETAILED RATIONALE:

NOISE IMPACT

The distance along the Combined Ramsgate Flight Swathe from the end of the runway to the first Ramsgate residential area is less than 0.8 nautical miles with aircraft directly overflying this residential area at an incredibly low altitude of around 200 feet⁹.

The distance along the Combined Ramsgate Flight Swathe from the end of the runway to the Ramsgate Royal Harbour and marina is just 2.03 nautical miles with aircraft directly overflying this public and residential area at a very low altitude of around 400-600 feet¹⁰.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003646-The%20Ramsgate%20Society%20-%20Comments%20on%20response%20to%20the%20Examining%20Authority%E2%80%99s%20First%20Written%20Questions%20-%20Funding.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004652-The%20Ramsgate%20Society%20and%20the%20Ramsgate%20Heritage%20and%20Design%20Forum%20-%20RS%20and%20RHDF%20submission%20Deadline%2011%20final.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004906-AS%20-%20The%20Ramsgate%20Society%20EIP%20Final%20Deadline%20submission.pdf>

6

https://www.kent.gov.uk/_data/assets/pdf_file/0003/29541/Manston-Airport-position-statement.pdf

7

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003135-Thanet%20District%20Council%20-%20Local%20Impact%20Report%20Manston%20Airport.pdf>

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[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004730-AS%20-%20Five10Twelve%20Ltd%20REGISTER%20OF%20ENVIRONMENTAL%20ACTIONS%20REP8-018%20SOCIO-%20ECONOMIC%20\(2\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004730-AS%20-%20Five10Twelve%20Ltd%20REGISTER%20OF%20ENVIRONMENTAL%20ACTIONS%20REP8-018%20SOCIO-%20ECONOMIC%20(2).pdf)

⁹ Altitudes- Ramsgate Sheet 1

¹⁰ Altitudes- Ramsgate Sheet 1

The airspace is at unacceptably low altitude and will expose a *new, large and vulnerable* population to very high levels of aircraft noise and air pollution.

Ramsgate has large population as of 30 September 2016, approximately 51,700 persons are registered to the General Practices in the Ramsgate locality (Kent Public Health Observatory Locality Profile for Ramsgate April 2017).

Further, Thanet District Council need to build 17,140 houses by 2031 (Thanet District Council Local Plan) a large percentage of these have been determined to be near or under the proposed flight swathe.

For example, the Manston Green strategic housing development has extant planning permission and is located *less than 1 km (0.6 miles)* from the former airport¹¹ and is under the Combined Ramsgate Flight Swathe.

The Manston Green development a significant strategic housing scheme has “*Application for outline planning permission including access for the erection of 785 dwellings, highways infrastructure works (including single carriageway link road), primary school, small scale retail unit, community hall, public openspace*”¹².

11

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004564-Cogent%20Land%20LLP%20Manston%20DCO%20Cogent%20Reps%20to%20Deadline%209%20inc.%20Appendices.pdf>

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004564-Cogent%20Land%20LLP%20Manston%20DCO%20Cogent%20Reps%20to%20Deadline%209%20inc.%20Appendices.pdf>

Ramsgate is also the largest conservation area in Kent¹³ and a large number of listed buildings. Most of these listed buildings (453) are residential with the majority under the Combined Ramsgate Flight Path with aircraft overflying at altitudes of 400-600 feet¹⁴.

It is also of note that a number of people live on the boats moored at the Royal Harbour and marina. The Royal Harbour marina is a Four Gold Anchor Award complex with 700 finger moorings¹⁵. Further, there is a residential park with 40 mobile retirement homes with aircraft overflying at altitudes of less than 200 feet¹⁶.

Further, given that RIVEROAK is proposing developing an airport, subject to DCO, that has been closed since May 2014 and establishing flight operations on a scale and frequency that the local population has never before been exposed to, the population of Ramsgate may in large be considered a new population exposed to noise.

The former airport was closed in May 2014. Since then children have been born and there has been a large influx of new residents. This is evidenced by the fact that house prices have risen in Ramsgate by 32.78%¹⁷ since the airport closure

¹³

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003579-Five10Twelve%20-%20Comments%20on%20Responses%20to%20ExA's%20WQ%20-%20Appendix%20Section%20G1-DD.pdf>

Colliers International (October 2018) Creative Industries in Historic Buildings and Environments Conservation Area Case Studies Page 81

¹⁴ Altitudes- Ramsgate Sheet 1

¹⁵

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004471-Five10Twelve%20Ltd%20-%20Thanet%20District%20Council%20and%20Ramsgate%20Town%20Council%20Properties.pdf>

¹⁶ <http://www.stargladeparks.com/smugglers-leap/>

¹⁷ <https://www.zoopla.co.uk/house-prices/browse/kent/ramsgate/?q=ramsgate%2C%20uk>

when compared to London house price rise of 20.12%¹⁸ and Brighton house price rise of 23.12%¹⁹. The increase in Ramsgate house prices is a huge increase.

According to the Kent Public Health Observatory, it is of note that the most populous electoral wards in Thanet these include Central Harbour and Eastcliff which are directly under the Combined Ramsgate Flight Swathe.

Ramsgate town centre has been identified as a Key Sustainability issues for Thanet²⁰. The town centre is under the Combined Ramsgate Flight Swathe with aircraft directly overflying at a very low altitude of 400-600 feet.

Further, most of the town centre is pedestrianized and is heavily used by Ramsgate residents.

Ramsgate is the largest traditional town centre in Thanet²¹ (by way for example as to its size Ramsgate town centre has 5 bank branches (NatWest, Lloyds, Halifax, Barclays, HSBC), a stand alone post office, greengrocers, butchers, bakers, home-baking stores, haberdashers, cafes, public houses, restaurants, hairdressers, beauty salons, wellbeing practitioners, leisure centre, dentist, chemists, cobblers, clothes and shoe shops, galleries, art shops, book shop, office supplies, gift shops and a library. It has a Grade II large community building²² and the day resources centre for East Kent Mencap at Foresters Hall (a Grade II building)²³

¹⁸ <https://www.zoopla.co.uk/house-prices/browse/london/?q=london%2C%20uk>

¹⁹ <https://www.zoopla.co.uk/house-prices/browse/east-sussex/brighton/?q=brighton%20uk>

²⁰ Arup (August 2018) Thanet District Council Draft Local Plan to 2031 Sustainability Appraisal – Environmental Report Page 46, Table 13: Key Sustainability Issues for Thanet [REP3-056] and attached for ease of reference

²¹

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004730-AS%20-%20Five10Twelve%20Ltd%20REGISTER%20OF%20ENVIRONMENTAL%20ACTIONS%20REP8-018%20SOCIO-%20ECONOMIC%20\(2\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004730-AS%20-%20Five10Twelve%20Ltd%20REGISTER%20OF%20ENVIRONMENTAL%20ACTIONS%20REP8-018%20SOCIO-%20ECONOMIC%20(2).pdf)

²² <https://historicengland.org.uk/listing/the-list/list-entry/1101734>

²³ <https://www.eastkentmencap.co.uk/>

SAFETY

Further, it jeopardises Ramsgate's population's safety and the safety and occupants of any overflying airplanes.

Major air disasters occur minutes after take-off or on landing²⁴. There were 6 airplane crashes in 2018 and one so far in 2019 resulting in a loss of over 800 lives. If any of these planes had crashed minutes after take-off at Manston due to the proximity of the town and low altitudes over Ramsgate the loss of life on land from 1 plane would be in the thousands.

To put into perspective how incredibly low the airspace altitude is it would be mindful to compare it to the provisions of The Air Navigation (Amendment) Order 2019 at Article 94A which states that:

“(2) Permission from the CAA is required for a flight, or a part of a flight, by a small unmanned aircraft at a height of more than 400 feet above the surface”.

My understanding of this provision means that a small unmanned aircraft such as a drone does not require permission from the CAA under 400 feet but anything over 400 feet does require such permission. There are commercial drone training courses available in Ramsgate²⁵ and drone users in Ramsgate.

It is also important to note that RIVEROAK as part of its DCO application is proposing to operate dedicated cargo airplanes.

As you will be aware pursuant to the Independent Transport Commission report, *The Sustainability of UK Aviation: Trends in the Mitigation of Noise and Emissions*,

²⁴ <https://www.bbc.co.uk/news/world-10785301>

²⁵ <http://commercialdronetraining.co.uk/kent>

these dedicated cargo aircraft are usually either conversions of older passenger aircraft or the last aircraft from a given aircraft production line. ‘

This will expose a new and large population to very high levels of aircraft noise and air pollution. Further, the use of older aircraft increases the safety risk to the Ramsgate population.

There is a MET station at Manston so accurate historical data is available especially about speed and direction.

This can be viewed at

<https://weatherspark.com/y/147917/Average-Weather-at-Kent-International-Airport-United-Kingdom-Year-Round>

The calmest day of the year is July 28, with an average hourly wind speed of 11.4 miles per hour.

The windier part of the year lasts for 5.4 months, from October 6 to March 17, with average wind speeds of more than 14.9 miles per hour. The windiest day of the year is January 1, with an average hourly wind speed of 18.4 miles per hour.

This means that aircraft will be flying into strong headwinds on their final approach and therefore will take longer to reach the runway, which creates delays and more noise, pollution, visual impact, and increase in safety risk.

Delays are typically absorbed through stack holding again which will create more noise, pollution, visual impact, and increase in safety risk.

OTHER CONCERNS

It has not been indicated from the literature at all where Runway 28 Easterly *departures* to the North will fly and/or Runway 10 Easterly *arrivals* from the

North will fly. Therefore there must not and cannot be any flights that will depart to the North on Runway 28 or arrive from the North on Runway 10.

It is incredibly unclear as to where is the indicative flight swathe for the Runway 28 Easterly arrivals to the South and Easterly departures from Runway 10. As you will be aware RIVEROAK have just stated '*no swathe indicated*' on the image and at the top of page 6 has stated these will be "*over the sea*". Presumably these flight swathes will at some point meet the runway; however, it is unclear as to where.

Further, it has not been indicated from the literature at all where Runway 28 Easterly *departures to the South* will fly and/or Runway 10 Easterly *arrivals from the South* will fly. Therefore there must not and cannot be any flights that will depart to the South on Runway 28 or arrive from the South on Runway 10.

Q5 - Are you aware of anything in the CAA Airspace Modernisation Strategy that presents a risk or opportunity to Manston Airport procedure development? Please provide details.

Response to Question 5

WE SAY:

RIVEROAK proposal is in direct conflict to the aim and mission of Upgrading UK Airspace Strategic Rationale Moving Britain Ahead ("**Moving Britain Ahead**") FAS plan airspace at Paragraph 6.2 to better manage noise impacts by reducing the number of aircraft overflying population centres and holding at lower altitudes. Overflying and holding over or near Ramsgate is simply not acceptable.

RATIONALE

This is detailed in Response to Question 1 and Question 4

Q6 - Have you previously had a Letter of Agreement or Memorandum of Understanding with the Operators of the 'previous' Manston Airport? If so, do you see this as an agreement that could influence the design of the Manston Airport departure and approach procedures? Please provide details.

Response to Question 6

RIVEROAK is the new owner of the land at Manston since only July this year. We strongly suggest this question is asked of, and by the previous owner.

Q7 - Please let us know if there are any day or evening time constraints that you consider RiverOak Strategic Partners could take into account when designing its departure and approach procedures?

Please provide details and reasons.

Response to Question 7

WE SAY (1/2):

RIVEROAK cannot overfly Ramsgate or the wider Thanet during the tourism season day or night.

RATIONALE

Thanet is part of Kent's bigger tourism picture and Thanet brings in 10% of the county's total visitor economy²⁶.

Thanet District Council provided evidence at the DCO Examinations that "*...the amenity impacts from the construction and operation of the proposed development*

²⁶ Kent welcomed 65 million visitors in 2017, and the visitor economy's value leapt by 7% to £3.8 billion. The county saw a record 64,970,000 visitors throughout 2017, with tourism industry accounting for 76,828 jobs. Thanet's tourism economy is now worth £319 million thanks to a spike in visitor numbers, new figures show. The district welcomed a record 4.2 million visits in 2017, meaning the value of Thanet's visitor economy grew by 9.2% since 2015 (the former airport closed May 2014).

may adversely affect the tourism industry in Ramsgate and the wider Thanet area and weigh against any proposed benefit”.

According to Chief executive of Visit Kent Deirdre Wells OBE: *“Tourism is the UK’s fastest growing service sector and these figures demonstrate the contribution which our vital industry makes to the economy of Kent” and “The challenge going forward will be to turn more of our day visits into overnight stays and short breaks, bringing even further growth to the county.”*

Breaking down overnight visits in Thanet by Town (Source Visit Britain latest data (2017)) Ramsgate had 20,000 overnight visitors, Broadstairs 15,000 overnight visitors and Margate had 13,000 overnight visitors.

The top 2 key influencers for visitors to Ramsgate and wider Thanet as evidenced at are coastline/beaches (53%) and recreational activities (30%)²⁷.

Ramsgate’s tourist offer is centred on these 2 key influencers - coastline/beaches (53%) and recreational activities (30%)²⁸ - as well as a strong heritage and maritime offer:

1. Ramsgate’s visitors currently enjoy kitesurfing, sailing, kayaking, canoeing, diving, seal boat trips, bird watching, tennis (open air tennis courts are at Spencer Square), swimming, football, croquet, bowls, walking, cycling, golfing, and horse riding (directly under the Combined Ramsgate Flight Swathe)
2. Ramsgate held the British Kitesurfing championships in 2019 (its second year) (directly under the Combined Ramsgate Flight Swathe)
3. Ramsgate was voted in the Top 100 ITV British walks (2018) (directly under the Combined Ramsgate Flight Swathe)

²⁷ <https://www.visitthanetbusiness.co.uk/media/3027/thanet-visitor-study-2018-infographic-final.pdf>

²⁸ <https://www.visitthanetbusiness.co.uk/media/3027/thanet-visitor-study-2018-infographic-final.pdf>

4. Active Ramsgate was awarded GOLD in the Community Care Award (2017) (directly under the Combined Ramsgate Flight Swathe)
5. Active Ramsgate brings in more than £240,000 per year and contributed to £1.2 million to Ramsgate's economy in the past 5 years since the airport closed²⁹.
6. Explore Kent awarded Ramsgate in 2016 with the first "We Love Walkers and Cyclists" accreditation status and is part of the 28- mile circular Viking Coastal Trail (one of the most attractive leisure cycle routes in Kent) which links up with Regional Route 15 of the National Cycle Network
7. It holds the second largest international regatta in the UK from the marina Ramsgate Week and the Regatta (directly under the Combined Ramsgate Flight Swathe)
8. Winter Wassail, May Fayre, Great Bucket and Spade Run, Looping the Loop, Ramsgate Festival of Sound (outside and indoors), Adventures in Performance, Ramsgate Carnival, and the Christmas laser light show and fireworks over the Royal Harbour (directly under the Combined Ramsgate Flight Swathe)
9. Ramsgate has a designated park and non-designated parks as well as Grade II Royal harbor (directly under the Combined Ramsgate Flight Swathe)
10. Ramsgate has Seaside awards for its sandy beaches at Ramsgate Western Undercliff and Ramsgate Main Sands (directly under the Combined Ramsgate Flight Swathe). It has a further sandy beach at Eastcliff beach directly under the proposed Easterly flight swathe. All our beaches have a cliff drop and/or promenade separating them from the road and as such are very tranquil.

WE SAY (2/2):

RIVEROAK cannot overfly Ramsgate or the wider Thanet during school hours.

²⁹ <https://www.kentonline.co.uk/thanet/news/tourism-project-worth-1-2m-for-town-209964/>

RATIONALE

There are 45 state funded schools located within 5 miles from Manston Airfield³⁰ (6 within 1-2 mile radius including a Special school and 30 within 2-3 miles radius including a Special school and Pupil Referral unit). This figure does not include the number of independent schools in the area. Many of these schools are within older or listed buildings.

Fledgelings Nursery School, Priory Infant School, Chilton Primary School, Ellington Infant School, Chilton Primary School, Ellington Infant School, Christchurch Church of England Junior School, The Grange Montessori (Townsend Montessori School), Elms Nursery School, St Laurence-in-Thanel Church of England Junior Academy, Chatham & Clarendon Grammar School, Bright Start Ramsgate, Newington Community Primary School, Mother Goose, The Old Priory School (special needs independent secondary school), Ramsgate Arts Primary School, St Ethelbert's Catholic Primary School and Small Haven School (Special needs independent school) and St Lawrence college (independent day and boarding school) are all located in Ramsgate.

A large number of these are directly under the Combined Ramsgate Flight Swathe with aircraft directly overflying at a very low altitude of 400 – 600ft.³¹

St Lawrence College located in Ramsgate is Kent's only High Performance Learning World. It charges fees of up to £12,303 for boarding pupils and £5,415 for day pupils³².

³⁰

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004611-KCC%20Copy%20of%20Appendix%201%20and%202%20-%20Schedule%20of%20schools%20within%20radius%20of%20Manston%20Airport.pdf>

³¹ Altitudes- Ramsgate Sheet 1

³² <https://www.slccuk.com/admissions/fees>

Q8 - Please tell us if there are any other operational constraints that RiverOak Strategic Partners will need to consider when planning its new arrival and departure procedures?

Response to Question 8

WE SAY:

In the (unlikely) event that the Development Consent Order (DCO) is granted, there are a number of operational constraints within the DCO. These operational constraints relate to night flights, time, type, number and frequency of ATMs in addition to Highways England and the acquifier.

IN ADDITION -

OPERATION BROCK

The land (runway) at the closed Manston Airport is set-aside as a lorry park in accordance with the Town & Country Planning (Manston Airport) Special Development Order 2019, which *inter alia*, grants planning permission until 31 December 2020, subject to limitations and conditions, for development consisting of use of land at Manston Airport for the stationing of goods vehicles and associated uses. It has also been confirmed that HMRC intends to use Manston to conduct customs checks on lorries diverted there. This is part of Operation Brock planning and is of nationally strategic and significant importance in place for transport resilience purposes. There is an option to extend this arrangement past 2021 and engage Sections 59 and 60 of the Town and Country Planning Act 1990 to extend the current Town & Country Planning (Manston Airport) Special Development Order as has been **done on 3 separate occasions since 2015**.

HIGH RESOLUTION DIRECTION FINDER ("HRDF")

The Ministry of Defence has objected to the proposed Manston DCO stating in its submission of 9 July that:

“insufficient information has been submitted to provide any positive indication that potential harm to safeguard operational defence assets can be overcome or readily mitigated”³³.

In the (unlikely) event that the Development Consent Order (DCO) is granted, the Defence Infrastructure Organisation has categorically stated that no timescales can be imposed on the Ministry of Defence in the DCO regarding the relocation of the HRDF. In the event that the re-provision of the HRDF equipment on an alternative site proves unsuccessful then the existing equipment will have to remain in its current location and this will prevent Manston from operating as proposed by RIVEROAK³⁴.

Q9 - Please inform us of who you consider to be the other key local aviation stakeholders that you believe RiverOak Strategic Partners should engage with during the process of designing its new procedures? Please provide details and reasons.

Response to Question 9

All 17 other airports subject to FASI(S) – as are all part of FASI(S)

Ministry of Defence – see answers throughout

Defence Infrastructure Organisation– see answers throughout

Lydd Airport - proximity

London Biggin Hill - proximity

Gatwick Airport - proximity

QEQM helicopter pad – medical attention

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004714-AS%20DIO%20Planning%20Inspectorate%20-%209.7.19.pdf>

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004579-Defence%20Infrastructure%20Organisation%20-%20Deadline%209.pdf>

Helicopter operators at Manston

Q10 - Please provide details of any constraints imposed by restricted operations in the area encompassed by Manston Airport flight operations (e.g. military operations, danger areas, restricted areas, route crossings, transit corridors, training areas etc.)?

Response to Question 10

HIGH RESOLUTION DIRECTION FINDER (“HRDF”)

The Ministry of Defence has objected to the proposed Manston DCO stating in its submission of 9 July that:

“insufficient information has been submitted to provide any positive indication that potential harm to safeguard operational defence assets can be overcome or readily mitigated³⁵” .

In the (unlikely) event that the Development Consent Order (DCO) is granted, the Defence Infrastructure Organisation has categorically stated that no timescales can be imposed on the Ministry of Defence in the DCO regarding the relocation of the HRDF. In the event that the re-provision of the HRDF equipment on an alternative site proves unsuccessful then the existing equipment will have to remain in its current location and this will prevent Manston from operating as proposed by RIVEROAK³⁶ .

Thanet Extension Offshore Wind Farm

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004714-AS%20DIO%20Planning%20Inspectorate%20-%209.7.19.pdf>

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004579-Defence%20Infrastructure%20Organisation%20-%20Deadline%209.pdf>

Vattenfall is currently developing a proposal for an extension to the existing and operational Thanet Offshore Wind Farm in Kent. The extension would involve the addition of up to 34 turbines on the edges of the existing wind farm.

Q11 - Please provide details of any issues or constraints due to local helicopter operations that you believe may have an impact on Manston Airport's procedure design project?

Response to Question 11

QEQM helicopter pad

Helicopter operators at Manston

Q14 - We would be grateful for any views you may wish to express regarding how RiverOak Strategic Partners should balance the needs of the airlines operating from Manston Airport against the needs of the local community.

Response to Question 14

WE SAY:

The Local Community have throughout the previous DCO process expressed strong, vocal and evidenced reasons as to why overflying Ramsgate is simply not acceptable.

RATIONALE:

CONSERVATION AREA

On 27 October 2019, Historic England revealed the historic sites most at risk of being lost forever as a result of neglect, decay or inappropriate development by publishing the annual Heritage at Risk Register 2019³⁷. The Register gives an annual snapshot of the critical condition of some of the country's most important historic buildings, sites, monuments and places.

³⁷ <https://historicengland.org.uk/whats-new/news/heritage-at-risk-2019/>

As you will be aware Ramsgate **had the following sites added to the At Risk Register** in October 2019:

- **The Conservation Area**³⁸
- **The Clock House, Royal Harbour**

The Conservation Area added to the At Risk Register is the **largest conservation area in Kent**³⁹. Most of these listed building (453) are residential with the majority under the Combined Ramsgate Flight Path at airspace of altitudes of 400-600 feet⁴⁰.

The Clock House, Royal Harbour added to the At Risk Register is also directly under the Combined Ramsgate Flight Swathe at altitudes of 300-600 feet. Ramsgate's Royal Harbour is the only Royal Harbour in the UK and the HE Colliers Report of October 2018 describes as "***the defining visual and historical architectural feature of the town***".

The Ramsgate Royal Harbour is Grade II* listed⁴¹ and many of the buildings, arches and monuments surrounding and part of the Royal harbour are Grade I, II and II* listed.

One of the ways that heritage can stop being at risk is inward investment both private and public.

³⁸ <https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/6973>

³⁹

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003578-Five10Twelve%20-%20Comments%20on%20Responses%20to%20ExA's%20WQ%20-%20Appendix%20Section%20G-AA.pdf>

⁴⁰ Altitudes- Ramsgate Sheet 1

⁴¹ <https://britishlistedbuildings.co.uk/england/ramsgate-thanet-kent#.XbxKoGgvOow>

The Ramsgate Society submission to the DCO titled Ramsgate Heritage Assets Under Threat⁴² which at Paragraph 22 it states:

“In Ramsgate all the heritage assets [including the largest Conservation Area in Kent] would be at a serious and permanent risk from a reopened Manston as noise, visual disturbance and pollution would rapidly lead to a deteriorating setting for the assets. Downward spiralling socio-economic impacts would lead to deterioration of the visitor and tourist economy, and there would be a lack of inward investment”.

This private and public inward investment has been forthcoming since the airport closed in 2014.

**PRIVATE INWARD INVESTMENT SINCE THE AIRPORT CLOSED IN MAY 2014
(PARTICULARLY USING EMPTY OR UNUSED HERITAGE SITES)**

- A. Micro Museum Expansion (2019) (directly under the Combined Ramsgate Flight Swathe)
- B. Van Gogh Sculpture in Spencer Square (2019) (directly under the Combined Ramsgate Flight Swathe)
- C. Wetherspoons (Royal Victoria Pavillion) (2017) a UK Top Employer5 £4.5m development (Number of tables just under 350 with large terrace, covers 900, staff went up to 200 currently in January 120-130) (directly under the Combined Ramsgate Flight Swathe)
- D. Foresters Hall which has been a community venue for over 200 years purchased by East Kent Mencap through a Community Asset Transfer (2019) (directly under the Combined Ramsgate Flight Swathe)
- E. St Augustine’s Visitor Centre built in 1860 (GBP 1.2m) (very near the Combined Ramsgate Flight Swathe)

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004684-The%20Ramsgate%20Society%20-%20Ramsgate%20Heritage%20Assets%20under%20Threat%20vfinal.pdf>

- F. Albion House (17 bed luxury hotel) (2014) built in 1791 voted The Telegraph's "The 50 Most Romantic Hotels in Europe" - in at number 15 (March 2017), The Times "20 Great hotels for a Weekend away" in at Number 10 (March 2017), The Times "Best Places by the Sea" (Number 26) (May 2016) (directly under the Combined Ramsgate Flight Swathe)
- G. Archive Homestores (10 staff members) in the Military Arches (directly under the Combined Ramsgate Flight Swathe)
- H. Pugin's The historical Grade II Listed former Hovis Flour Mill in central Ramsgate is being transformed into a mix of contemporary residences (directly under the Combined Ramsgate Flight Swathe)
- I. £27 million development of old Ramsgate police station Cavendish Street and former Magistrate's House (2017/8) (directly under the Combined Ramsgate Flight Swathe)
- J. Landmark Trust's Grade I listed the Grange (1844) holiday home(directly under the Combined Ramsgate Flight Swathe)
- K. Falstaff built in 1801 within the West Cliff conservation area as well as three seaside vacation apartments (directly under the Combined Ramsgate Flight Swathe)
- L. Petticoat Emporium (2015) 175 individual traders covering 205 pitches as well as a variety of cabinets, rails and display options and two shops run by the shop owners: Coastal Chic and Bow Street Bags (near the Combined Ramsgate Flight Swathe)
- M. The Military Arches have 100% occupancy now (rather than 50%) (2013/14) (directly under the Combined Ramsgate Flight Swathe)
- N. Ramsgate Music Hall (voted best small venue by NME in 2015) (directly under the Combined Ramsgate Flight Swathe)
- O. Ramsgate Tunnels (re-opened May 2014) (near the Combined Ramsgate Flight Swathe)
- P. Circa twenty restaurants and cafes and circa 10+ shops have opened since the airport closed including a Michelin Bib Gourmand award restaurant (directly under the Combined Ramsgate Flight Swathe)

PUBLIC INWARD INVESTMENT SINCE THE AIRPORT CLOSED IN MAY 2014

(PARTICULARLY USING EMPTY OR UNUSED HERITAGE SITES)

- A. Ramsgate town centre and sea front, both directly on the flight path, are nationally recognised areas of historic and cultural significance. There are currently four major (each one 1 million pounds or more) grant-funded restoration schemes that would be impacted by overflying.
1. Ellington Park (The National Lottery Parks For People Fund)
 2. The Future High Streets Fund (DCMS)
 3. The High Street Heritage Action Zone Scheme (DCMS and Historic England)
 4. The Heritage Horizon Awards (The National Lottery Heritage Fund)
- B. Ramsgate received an initial £50,000 funding to rescue Ramsgate's Rock Gardens for work on the Pulhamite rocks on the Madeira Walk fountain and Albion gardens.
- C. Ramsgate is part of Pioneering Places an ambitious project that will make East Kent an even better place to live, work and visit by exploring heritage, developing civic pride and connecting artists and communities. The investment will act as a catalyst for Ramsgate's vibrant and growing cultural scene, bringing with it greater community cohesion, educational attainment and a positive impact on jobs, health and wellbeing. The focus is a public artwork commissioned at a value of £300,000 of the £1,489,255 funding to be positioned at the Royal Harbour environs.
- D. The designation by Historic England of Ramsgate in 2017 as one of the first ten areas to be declared a Heritage Action Zone (HAZ). Through the Heritage Action Zone (HAZ) initiative HE and the local HAZ partnership is looking to unleash the potential in Ramsgate's historic environment to create economic growth and improve the quality of life for local residents. The Ramsgate five-year HAZ programme aims to regenerate the local economy by capitalizing on its rich maritime heritage and historic environment. The Ramsgate Society is one of the core members of the HAZ partnership as is the Ramsgate Town Council. If the airport was to

come into operation, with its close proximity to the town, with its associated noise, air pollution, and visual intrusion then potential funders and grant awarding bodies would no longer look favourably on Ramsgate as worthy of investment since benefits would immediately be eroded by negative impacts of the airport, thus *reinforcing* a spiral of decline. The airport would kill tourism in general and regeneration via heritage in particular⁴³.

PUBLIC SAFETY ZONES

According to Thanet District Council "*Pubic Safety Zones, would have significant implications for planning policy in the district, and would need to be addressed in the proposed review of the Local Plan, in the event that the DCO is granted. On the basis of the submitted information, 2 sites allocated for housing development in Ramsgate in the Draft Local Plan would be affected. One of these sites has current planning permission and has been substantial built out (Lorne Road), whilst the other site has planning permission for 6 dwellings and an additional 16 allocated but not covered by a planning permission (Seafield Road/Southwood Road). As well as these specific allocations, the draft plan makes provision for windfall sites (within the urban confines) to come forward with approximately 2,500 homes by 2031 across the whole district. TDC would need to consider whether a precautionary policy linked to potential future PSZ designation would be appropriate, to identify an exclusion zone for new housing or housing conversions through such a policy, to be effected in the event that a PSZ is designated. In addition, the Council would have to consider whether an Article 4 Direction to restrict permitted development rights allowing conversion to residential use in the identified area might be appropriate in due course*⁴⁴".

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004684-The%20Ramsgate%20Society%20-%20Ramsgate%20Heritage%20Assets%20under%20Threat%20vfinal.pdf>

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004125-Thanet%20District%20Council%20-%20response%20to%20ExO3.pdf>

FUEL-TANKERING

As you will be aware there is no fuel pipeline at Manston airfield. This means planes will have to buy fuel from the airfield. A significant part of RiverOak's business plan provided to the DCO Examination is to sell fuel to airlines at a higher price⁴⁵. There is a risk that airlines will engage in fuel-tankering rather than purchase fuel from Riveroak. It is common practise for airlines to engage in fuel-tankering due to currency rates or costs of fuel in destination countries.⁴⁶

FUEL DUMPING

There were a number of submissions to the DCO Examination which spoke of past fuel dumping over Ramsgate when fuel-laden planes were too heavy to land. The low altitude and the strong winds off the coast of Ramsgate mean that there is a significant risk that airline fuel will be blown on or over Ramsgate at a low altitude. This is a grave health concern.

VULNERABLE PEOPLE NEW TO NOISE

In the Central Harbour and Eastcliff wards there are in excess of 461 children aged 0-4 years⁴⁷. This means that 11% of the children aged 0-4 years in Thanet, who have never experienced aviation noise, will be living, playing and sleeping with aircraft directly overflying at a very low altitude of around 600 feet.

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004852-AS Five10Twelve Resubmission%20of%20Evidence.pdf>

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<https://www.theguardian.com/business/2019/nov/11/ba-to-review-fuel-tankering-after-panorama-revelations>

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https://www.kpho.org.uk/data/assets/pdf_file/0003/66657/Thanet-CCG-Demographic-Overview-Final.pdf

In the Central Harbour and Eastcliff wards there are in excess of 1,124 children aged 5-17 years⁴⁸. This means that 10% of the children aged 5-17 years in Thanet, who may have never experienced aviation noise, will be living, playing, studying and sleeping with aircraft directly overflying at a very low altitude of around 600 feet.

There are 17 retirement homes and sheltered housing under the Combined Ramsgate Flight Swathe⁴⁹.

Working Churches, places of Worship and/or Remembrance

Ramsgate's Churches, places of Worship and/or Remembrance cater for many religions – Catholic, Methodist, Anglican, Church of England, Judaism as well as Hindu – dating from 1062 to 1957 as well as offering community services such as Narcotics Anonymous. Many of our Churches, places of Worship and/or Remembrance are Grade I and/or Grade II listed buildings and of historical importance.

In addition, the majority are *working* Churches, places of Worship and/or Remembrance with services for the public. Some of these are directly under the Combined Ramsgate Flight Swathe with aircraft directly overflying at a very low altitude of 400-600 feet⁵⁰.

Open Spaces

Ramsgate's communities, museums & theatres and recreational parks ("**Community Areas**") are also under the Combined Ramsgate Flight Swathe with aircraft directly overflying at a very low altitude of 390-600 feet⁵¹. These Community Areas are spaces for children, young adults, disabled and abled use.

⁴⁸

https://www.kpho.org.uk/_data/assets/pdf_file/0003/66657/Thanet-CCG-Demographic-Overview-Final.pdf

⁴⁹ <http://www.housingcare.org/sheltered-housing/area-3-1155-ramsgate-kent-pg2.aspx>

⁵⁰ Altitudes- Ramsgate Sheet 1

⁵¹ Altitudes- Ramsgate Sheet 1

In addition to the grass, flowers, trees, beaches, basketball courts, tennis courts, established large trees, benches, bowling these Community Areas have well surfaced access routes for visitors with pushchairs and/or wheelchairs and are award winning⁵².

Q15 - Please advise us of any other issues or constraints you feel RiverOak Strategic Partners could consider when designing its new departure and approach procedures? Please provide details.

Response to Question 15

WE SAY

RIVEROAK must provide an accurate Environmental Statement.

BASELINE NOISE DATA/ BACKGROUND NOISE DATA

There were a great number of submissions to the DCO Examination with evidence that rebutted RIVEROAK's baseline noise data/ background noise data for Ramsgate.

Here are just 3 examples:

1. It was recorded that at OBS 12 of the baseline noise data / background noise data that the sound of a military jet could be heard on 7 March 2017 in the background. Military jets do not usually fly over Ramsgate. As you will be aware on 7 March 2017 there was an atypical event over England and near Ramsgate.

A private Saab 340 inbound from Bucharest to Birmingham encountered communication details and *"in accordance with normal operating procedures the aircraft was intercepted by military jets on arrival into UK airspace and was escorted up to its scheduled arrival into Birmingham."*⁵³

⁵²

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004471-Five10Twelve%20Ltd%20-%20Thanet%20District%20Council%20and%20Ramsgate%20Town%20Council%20Properties.pdf>

⁵³ BBC News, 7 March 2017, RAF jets escort plane to Birmingham airport

- ”. This data was nevertheless captured as a ‘normal day in Ramsgate’ and used as the baseline noise data / background noise data.
2. It was evidenced that baseline noise data / background noise data was taken near railways, busy roundabouts, near a busy supermarket and busy roads rather than at points – schools, residential areas, the pedestrianised town centre, parks - under the Combined Ramsgate Flight Swathe.
 3. At OBS 12 of the baseline Noise Data it was also recorded by RIVEROAK that the dominant source of sound is “*wind rustling through the trees*”. However there are no trees at OBS12.

ENVIRONMENTAL STATEMENT

RIVEROAK’s Overall Summary of Case⁵⁴ stated that its Environmental Statement assessed ‘**likely significant effects**’; however, in RIVEROAK’s CAA Interface Document⁵⁵ it states that at workshops with the CAA and within its Executive Summary that “***the DCO submission will be based on ‘worst credible’*** scenarios (in terms of environmental impact)”. Clearly these are two conflicting baselines for the Environmental Statement.

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004668-Applicant's%20Overall%20Summary%20of%20Case.pdf>

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-002460-7.5%20-%20CAA%20Interface%20Document.pdf>

Organisation: Non-invitee feedback Part 2

Area	Location	Type	Distance from End of Runway (Nautical Miles)	Est. Altitude of overhead planes (Ft)	Relevant Representation	RR URL	See Also
Nethercourt	Windermere Avenue	Residential	0.81	243	Nethercourt Action Group	https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipsection_releprs&ipsearch_nethercourt&ippagesize_500&ippagesizesubmit_Apply&relrep_27955	
Nethercourt	Nethercourt Touring Park	Recreational	1.17	351	Nethercourt Touring Park	https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipsection_releprs&ipsearch_touring+park&ippagesize_10&relrep_28463	
Southwood	Ramsgate Football Club	Recreational	1.32	398			
Southwood	Southwood Gardens	Residential	1.33	399			
St Lawrence	St Lawrence Church	Place of Worship	1.37	411			
St Lawrence	Warre Recreation Ground	Recreational	1.41	423			
St Lawrence	Ellington Infant School	School	1.43	429			
St Lawrence	St Lawrence in Thanet Junior Academy	School	1.43	429			
Ellington	Ellington Park	Recreational	1.5	450			
Ramsgate Centre	Christ Church of England Jr School	School	1.81	483			
SW Ramsgate	The Grange (Pugin)	Heritage	1.82	486			
Westcliff	Ramsgate Croquet Club	Recreational	1.87	501			
Westcliff	Westcliff Promenade	Recreational	1.88	504			
SW Ramsgate	Priory Infant School	School	1.75	525			
Ramsgate Centre	Christ Church	Place of Worship	1.76	528			
Ramsgate Centre	Vale Square and Gardens	Residential	1.76	528			
SW Ramsgate	St Augustine's Shrine and Abbey (Pugin)	Heritage	1.76	528	Ramsgate Heritage & Design	https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipsection_releprs&ippagesizesubmit_Apply&ipsearch_royal+harbour&ippagesize_500&relrep_29354	
SW Ramsgate	St Augustine's Roman Catholic Church	Place of Worship	1.76	528			
SW Ramsgate	Divine Retreat Centre	Place of Worship	1.76	528			
Ramsgate Centre	Elms Nursery School	School	1.77	531			
Westcliff	Churchill House School of English Language	School	1.84	552			
Ramsgate Centre	Chatham and Clarendon Grammar School	School	1.89	567			
Westcliff	Spencer Square Public Tennis Courts	Recreational	1.91	573			
Westcliff	The Old Priory School	School	1.91	573			
Ramsgate Centre	St George's Church	Place of Worship	1.94	582			
Ramsgate Centre	Liverpool Lawn Gardens	Recreational	1.98	594			
Ramsgate Centre	Hardres St United Church	Place of Worship	2	600			
SW Ramsgate	Chatham and Clarendon 6th Form Centre	School	2	600			
Marina	Sailor's Church	Place of Worship	2.01	603			
Marina	The Arches (Restaurants and Bars)	Restaurants/Cafes	2.01	603			
Westcliff	West Cliff Arcade (Restaurants)	Restaurants/Cafes	2.01	603			
Marina	Royal Harbour and Marina	Tourism	2.03	609			
Eastcliff	Albion Place Gardens	Recreational	2.17	651	Friends of Albion Place Gardens	https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipsection_releprs&ippagesizesubmit_Apply&ipsearch_albion+place&relrep_28848	
Eastcliff	La Belle Alliance Square	Recreational	2.18	654			
Eastcliff	Albion House Hotel	Tourism	2.18	654	Albion House Hotel	https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipsection_releprs&ippagesizesubmit_Apply&ipsearch_albion+hotel&relrep_29495	
Royal Harbour	Royal Harbour (Restaurants and Bars)	Restaurants/Cafes	2.2	660			
Eastcliff	Mother Goose Nursery	School	2.22	666	Mums Against Manston	https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipsection_releprs&ippagesizesubmit_Apply&ipsearch_ramsgate+library&relrep_27978	
Royal Harbour	Royal Victoria Pavillion (Beachside Terrace)	Restaurants/Cafes	2.24	672			
Eastcliff	Arklow Square	Recreational	2.25	675			
Eastcliff	Holy Trinity Church	Place of Worship	2.25	675			
Eastcliff	Eastcliff Promenade/Bandstand	Recreational	2.27	681			
Eastcliff	Eastcliff Promenade/Pleasurama	Development Opportunity	2.27	681			
Royal Harbour	Ramsgate Main Sands	Recreational	2.28	684	Ramsgate Coastal Community	https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipsection_releprs&ipsearch_pugin&relrep_28121	
Ramsgate Centre	Ramsgate Library	Library	2.29	687	Mums Against Manston	https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipsection_releprs&ippagesizesubmit_Apply&ipsearch_ramsgate+library&relrep_27978	
Eastcliff	4 Winds Residential Care Home	Residential	2.37	711			
Nearest Railway Stations							
Minster	Minster Station	Transport	3.2				
St Lawrence	Ramsgate Station	Transport	2.6				