

MANSTON AIRPORT 2018 CONSULTATION

1 INTRODUCTION

This is the combined response of The Ramsgate Society and the Ramsgate Heritage and Design Forum to RiverOak Strategic Partners (RSP) second statutory consultation exercise. RSP plan to re-open the airport, closed to operations in 2014, and to develop it as an international hub for air freight and associated passenger services. Their intention is to apply for a Development Consent Order from the Planning Inspectorate in accordance with the regulations in respect of a National Strategic Infrastructure Project (NSIP) in order to compulsorily acquire the site from the current owners Stone Hill Park.

Our response takes the following form :

- a reminder of our conclusions from the 2017 statutory consultation exercise
- an overview of the documentation supporting the current consultation exercise
- impact of RSP's plans on the historic and special heritage character of Ramsgate
- impact of RSP's plans on the health and well-being of Ramsgate residents
- review of the case for a National Strategic Infrastructure Project (NSIP)
- conclusions .

2 2017 CONSULTATION EXERCISE

Following a thorough review and analysis of the documentation produced by RSP in the first round of Statutory Consultation in July last we reached the following conclusions on the business case underlying the proposal :

- The airfreight market has remained flat over the last 15 years and shows no indication of growth and within it the dedicated freight market accounts for around 30% by tonnage.
- RSP has produced no evidence of a lack of dedicated airfreight capacity in London and the South East.
- There are well established existing competitor airports -Stansted and East Midlands in particular- which have plenty of capacity to expand if warranted by the market.
- There are no compelling reasons why a freight forwarder or carrier would favour Manston over other airports; indeed Manston, situated at the toe of south east England, is in an unfavourable geographic location.
- RSP makes wholly implausible and exaggerated claims of marketshare when in operation and has presented unsubstantiated and speculative forecasts .

We also reviewed the evidence set out in the Preliminary Environmental Impact Report (PEIR) prepared under the 2009 environmental assessment requirements and noted the following negative impacts:

- To air quality, A serious degradation in air quality for residents and visitors to Ramsgate and surrounding settlements is threatened by the landing and taking off of air cargo carrying aircraft and vastly increased heavy goods traffic, from and to the site
- To biodiversity. The proximity of Manston to the internationally recognised Nature reserve at Pegwell Bay and Sandwich poses a major threat to endangered and rare species currently found within the reserve.
- To the historic environment With over 400 listed buildings, many of considerable antiquity and national importance, and four conservation areas, Ramsgate faces significant risk of damage to its older and more fragile buildings given the nature and scale of the proposed airport operation. The disturbance from air traffic would so reduce the desirability of the town that the refurbishment and repair of historic buildings would become a far less attractive proposition and the urban fabric would deteriorate.
- To noise and vibration, With a population of over 40,000 and with a significant visitor population in the summer months, Ramsgate faces major noise and disturbance from 24/7 airport operation with significant health and well-being consequences.
- To socio-economics Ramsgate, along with the rest of Thanet, depends critically on tourism as a major growth industry, the future prosperity and expansion of which is seriously placed at risk by the air freight business proposed.

3 REVIEW OF 2018 DOCUMENTATION

Consultation Documentation: Requirements of the Applicant

The Government places obligations on RSP when it comes to public consultation via “Planning Act 2008: Guidance on the Pre-application Process”, produced by the DCLG (now MHCLG). It emphasises the importance of effective pre-application consultation by developers before submitting an application for a Development Consent Order (DCO). To summarise:

- The developer must set out clearly what is being consulted on.
- It must give consultees a clear idea of what is being proposed;
- information must be accurate;
- Information must be made available at a stage that allows people a chance to shape the proposal;
- Information must be engaging and accessible so that it encourages people to offer their opinions;
- The consultation should be appropriate to the area over which its effects will be experienced;
- The consultation should provide clarity and enable people to develop an informed view of the project

Paragraph 20 of the DCLG Guidance states:

“Experience suggests that, to be of most value, consultation should be:

- *based on accurate information that gives consultees a clear view of what is proposed including any options;*
- *engaging and accessible in style, encouraging consultees to react and offer their views*

RSP documentation : critique

For this current round of consultation RSP has produced :

- Over 3,900 pages, of which the Preliminary Environmental Impact Report (PEIR) accounts for 92%.
- A total of 18 volumes.
- Of which the PEIR comprises 11 volumes, each prefixed '02', including 42 Appendices containing tables, diagrams and images.
- The remaining 7 other titled volumes are confusingly prefixed 01, 03 – 08.

There is an overall lack of signposting of content throughout. Only 07 has a comprehensive 'contents' page. The PEIR volumes are simply numbered without a descriptive title on the cover. Volumes do not have contents pages (let alone Indexes); neither do many Chapters or Appendices. The PDF format means that computer searches of the text by topic or keywords are not feasible.

Navigation through this vast amount of documentation is extremely difficult for any consultee. The net effect is to deter engagement. It is extremely difficult to locate and follow a specific topic of interest. The language used is highly technical making it very difficult to understand. Even the 'Non-technical Summary' makes few concessions to the general public. In this sense, there is a lack of focus on the lay readership

Taking this point we have compiled a list of questions which a member of the public might ask in order to understand the impact of the development on themselves, and hence their overall opinion of its merits:

1. What is the flightpath over Ramsgate?
2. What altitude will the planes be at various points over the town?
3. How many flights will there be daytime and night time?
4. What is your limit for the number of night flights
5. How noisy will the planes be passing over the town? Will night flights disturb sleep?
6. What effect could the noise, disturbance and pollution from all these planes have on health and wellbeing?
7. All these low flying planes are going to make the town less attractive; to what extent will that depress the property values?
8. To what extent will tourism be affected by all the aircraft movements?
9. What compensation will there be for damage to health, well being, and property, what would it be and who would qualify?

Very few of these are capable of answer easily and for several there is insufficient detail or no coverage to reach a view. This is where public presentation and informed advisers come into play. In a well run consultation exercise we would have expected there to have been more than just 2 public events – one in Ramsgate and one in Herne Bay – to help in explaining the scope of RSP 's proposals and through advisers and consultants in attendance, answers to questions such as these.

In conclusion we believe the consultation exercise falls well short of the expectations of Government guidance and will need to be repeated before a DCO application is entertained by the Planning Inspectorate.

4 IMPACT ON RAMSGATE'S HISTORIC AND HERITAGE SPECIAL CHARACTER

Ramsgate 'scoped out' of the Historic Environment assessment

In our earlier response we stressed the importance of considering the impact of the proposed project on the historic and heritage special character of Ramsgate as a whole. Lying directly on the prospective eastern flight path and wholly contained within a zone between 1.2km and 4.15km distant from the runway, we believed Ramsgate should have been included within the assessment required of the **Historic Environment**

Remarkably and regrettably, Ramsgate was 'scoped out' when RSP commenced the environmental assessment process under the 2009 and no longer applicable regulations.. A tight zone of just one km from the airport site boundary was agreed by the Planning Inspectorate as the extent of the study area. This followed consultation with the relevant statutory bodies, including Historic England, Kent County Council and Thanet District Council. As a consequence the only reference given to Ramsgate in the documentation material now is buried in **Appendix 9 table 5.1 of Volume 6 of the PEIR** and simply records that the airport site cannot be seen from Ramsgate's conservation areas due to topography and the built environment.

This position is **untenable**. No consideration has been given to the impact of the eastern flightpath which lies directly over the town (see Figure 1). Around 70% of landing aircraft approach from this direction. Nor to the implications of the glide path on landing and the height of aircraft above various parts of the built-up area. This is a key factor in noise disturbance and an assessment of the potential for physical damage to building fabric.



Figure 1 Landing approach flight path over Ramsgate (with distance markers at 1km intervals)

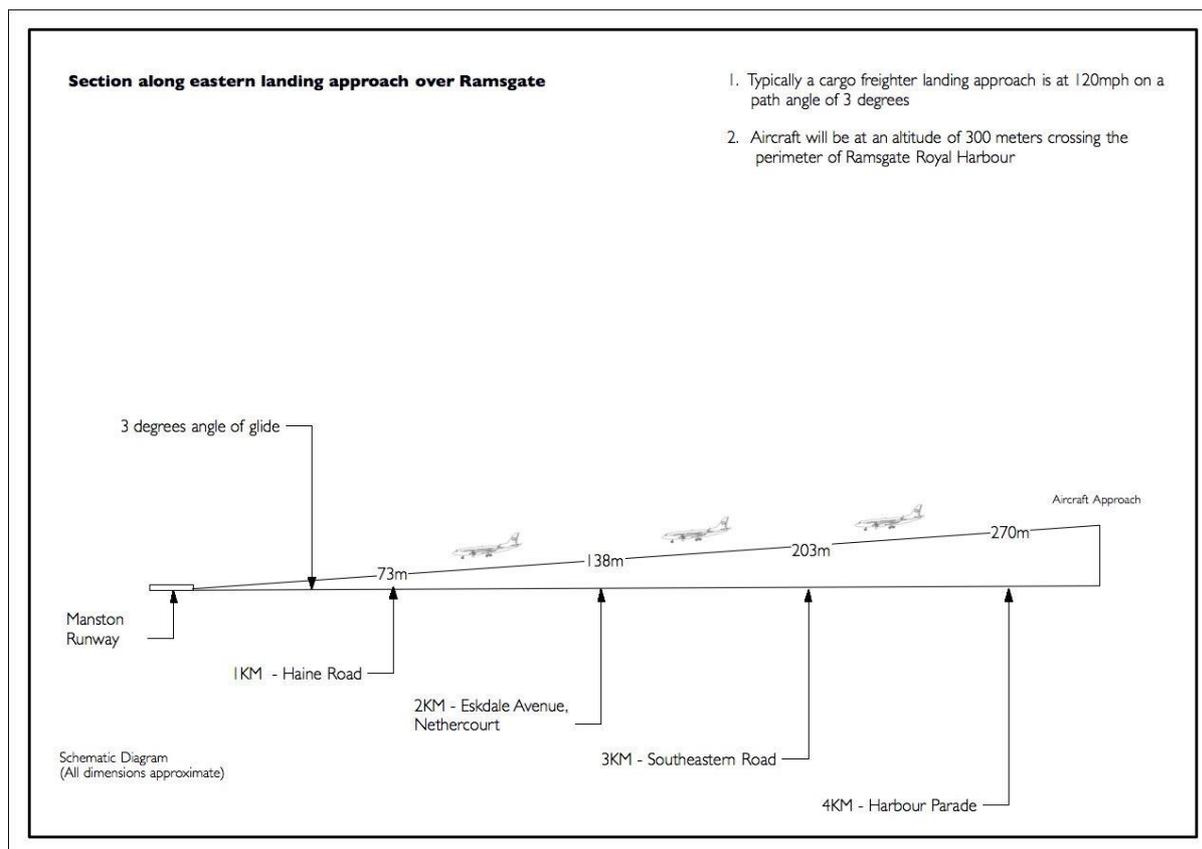


Figure 2 Landing Glide path over Ramsgate

To be credible RSP's assessment of the effects of its proposals on the Historic Environment must include consideration of Ramsgate. Given the stronger emphasis on heritage matters following publication of a recent study of noise impacts¹ which draws attention to the potential disruption to the fabric and character and setting of a heritage assets, we urge the Planning Inspectorate to require RSP to seek a new scoping opinion under the terms of the 2017 regulations. We would also urge Historic England and Thanet District Council to insist on the inclusion of Ramsgate with its wealth of historic and architectural valued buildings and townscape as set out below.

Ramsgate's historic and heritage special character

Ramsgate has 443 listed buildings in total. this includes 5 Grade 1 and 10 Grade 2* listings as follows:

Grade 1 Listed in Ramsgate

- Church of St Augustine of England (Roman Catholic) with Cloisters Attached, Abbey
- Church of St George, Church
- Church of St Laurence, Church
- St Edwards, Priests House
- The Grange, House

Grade 2* Listed in Ramsgate

¹ A report in 2014 by English Heritage (*Aviation Noise Metric - Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England, Project No. 6865 Final Report – 2014*),

- 124 High Street, House
- Barn about 50 metres East of Ozengell Grange, Tithe Barn
- Cemetery Chapels, Anglican Church
- Chilton Farmhouse, Farmhouse
- The Clock House, Maritime Museum
- Italianate Glass House and Wall to which it is attached
- Harbour Cross Wall, Sluices, Bollards, Dry Dock, Basin Gates, Wing Wall and Dundee Steps
- Mausoleum of Sir Moses and Lady Judith Montefiore, Mausoleum
- The Old House and Walled Forecourt, House
- Synagogue and adjacent Outbuilding, Synagogue
- Townley House Mansion, House

Ramsgate's Conservation Areas

The great variety of heritage in Ramsgate is reflected in the different characters of its four conservation areas. The three main areas are described below.

Ramsgate Royal Esplanade Conservation Area was designated in 2006 and is based around an area designed in the 1920s especially for leisure purposes. The area is described by the Conservation Area Appraisal as having two different character areas – that around the former Bon Secours Nursing Home (a Grade II listed 18th Century house) and the other the planned leisure landscape of Royal Esplanade itself which includes a promenade and large open green spaces. The buildings in the area date mainly from the 1920s complete with croquet lawns, bowling greens and a boating lake. The most noticeable buildings highlighted in the appraisal include the former tea pavilion, the club house for the croquet and bowls club and the 18th Century House part of the grounds of which were incorporated into the 20th Century scheme. You can also still see the cliff lift designed for easy access to the beach, and some beautiful cast iron shelters.

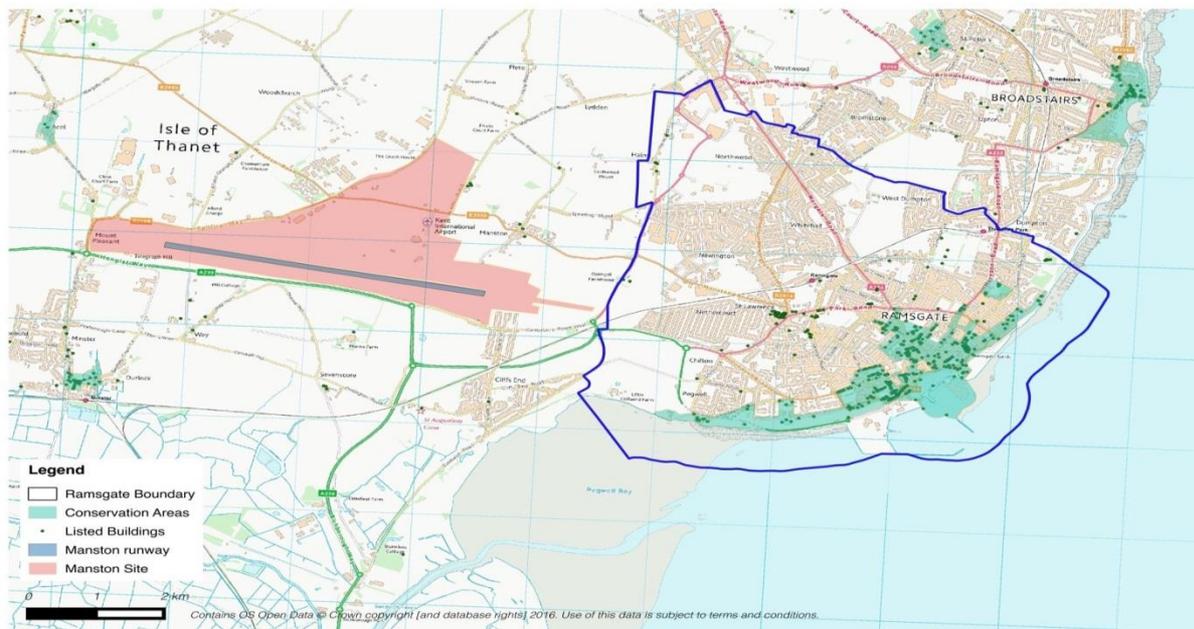


Figure 3: Ramsgate boundary, Conservation areas and proximity of the airport site

Sitting alongside the Ramsgate Royal Esplanade Conservation Area is the centrally located *Ramsgate Conservation Area*. This is the largest of the three conservation areas in Ramsgate and the earliest to be designated in 1970 and later extended. The conservation area takes in most of the town centre from the listed buildings near the top of the High Street (including the 17th Century Grade II listed Sylvian hotel), to The Grange in the west (designed by Augustus Pugin, one of Britain's most influential architects who also designed interiors of the Houses of Parliament) and stretching as far east as the Pulhamite rock constructed Winterstoke Gardens (another 20th Century leisure landscape designed specifically for strolling and contemplation). This conservation area includes the most defining features of Ramsgate – the Royal Harbour. Construction began in 1750 to create a harbour specifically designed to offer refuge for sailing vessels caught from storms in the Channel. Still a working harbour it is a striking monument to the amazing feats of Georgian engineering. Ramsgate harbour has a wealth of stories to share around the Dunkirk evacuation, the royal connection to George IV, smack boys, maritime rescue and more.

The third conservation area in Ramsgate is the *Ramsgate Montefiore Conservation Area* designated in 2007. Based around the Montefiore Synagogue built in the early 1830s, this conservation area is much smaller in size and lies just north west of Winterstoke Gardens. This is the only known example in the country of a synagogue built on a private estate and only the second synagogue to be built for Sephardic Jews. Jewish Heritage UK list it as one of Britain's top ten historic synagogues.

Ramsgate Heritage Action Zone

In 2017 Historic England launched a £6m nationwide project designed to unlock untapped potential in areas that are rich in heritage, bringing historic places back to life to attract residents, tourists, businesses and investors, and create economic growth. Ramsgate was one of only ten locations awarded Heritage Action Zone (HAZ) status. The HAZ covers the whole of the town and gives national and regional recognition to the importance of the heritage assets of Ramsgate as well as the potential and need to enhance and improve them to harness their potential to regenerate the town and further develop heritage tourism.

The HAZ involves a 5 year programme of projects and initiatives. The aim is for the Heritage Action Zone programme to grow Ramsgate into a prosperous maritime town where outstanding heritage and architecture coupled with new investment and development strengthens the economy for the benefit of the local community. Ramsgate will look to achieve economic growth by using the historic environment as a catalyst.

Once a thriving and prosperous town with an economy based on agriculture, fishing and tourism, large parts of Ramsgate are now in the 10% most deprived in the country according to the Index of Multiple Deprivation. Despite the richness of its historic environment, Ramsgate has significant socio-economic problems and many of its heritage assets have been neglected because their economic and cultural worth are not fully understood or recognised.

Some assets, like the extensive network of tunnels under the town, are beginning to develop as tourism and visitor attractions. From evidence of a Neolithic causeway enclosure to the west, to industrial activity from Roman times in the Harbour, and on through the Gothic Revival inspired by Augustus Pugin, to the role of the Harbour in the evacuation of Dunkirk in WWII, Ramsgate has a wealth of architectural and historic stories which the Heritage Action Zone will look to capitalise on so that the benefits and value of Ramsgate's heritage can be maximised for the local population and contribute towards the economic growth of the town.

The Heritage Action Zone partnership is made up of several organisations working together to deliver heritage based projects in Ramsgate and includes Historic England Thanet District Council, Ramsgate Town Council, The Ramsgate Society and the Ramsgate Coastal Community Team. The focus of its work is on :

- Enabling the heritage of Ramsgate is better understood, enjoyed, valued and protected.

- Engaging the local community of Ramsgate and increasing participation with the historic environment
- Raising awareness of Ramsgate as a heritage destination
- Developing and improving heritage related capacity and skills in Ramsgate
- Promoting heritage management best practice and raise design standards and quality.

5 IMPACT ON HEALTH AND WELL-BEING OF RAMSGATE'S RESIDENTS

The impact of commercial aviation on the health and well-being of communities living close to major airports has become, both here and in Western Europe, a matter of increasing public and political concern. The continuing debate over the consequences of a third runway at Heathrow provides a good illustration.

As a reflection of this growing interest the new 2017 environmental regulations applying to NSIPs require proponents to make an assessment of the risks to human health of their proposals. **Chapter 15 of Volume II of the Preliminary Environmental Impact Report (PEIR)** sets out the intended approach of RSP's consultants to this new area of study. The results of this work are awaited with interest. Meanwhile their preliminary analysis highlights some useful findings drawn from evidence taken from the 2017 consultation exercise and subsequent interviews.

Noise

There is concern that aircraft noise has severe negative effects on people's health and quality of life. Short term health/quality of life concerns include sleep disturbance, annoyance, and impairment of learning in children, while longer term health/quality of life concerns include the associated risk of high blood pressure, heart disease, heart attack, stroke, dementia and mental health issues. In particular, residential occupiers within close proximity of the airport and residents living under flight paths are considered sensitive receptors, especially to aircraft noise generated from night flights. In addition, the fiscal impact on health services from health problems associated with exposure to aircraft noise above recommended levels is a cause for concern

Air pollution

There is concern that the construction and operation of the Proposed Development will increase air pollution, which could exceed guidelines set to be protective of the environment and human health. Health problems associated with air pollution which have been identified by consultees include Alzheimer's, cancer, decreased pulmonary function, respiratory morbidity, cardiovascular morbidity, and increased mortality rate/premature death

Health inequalities / sensitive members of the community

Thanet has high levels of deprivation with some of the worst health outcomes and lowest life expectancy throughout Kent. In addition, Thanet's population is more elderly than the national average. Particularly sensitive communities within Thanet identified by statutory consultees include Newington, Ramsgate and Herne Bay.

It has been suggested that these communities should be given particular consideration when assessing impacts on human health. There are many children in Newington, a high proportion of social housing, and poor educational attainment (the latter point for throughout Thanet). This is a particular concern that flights will disrupt lessons and children's sleep, resulting in tiredness during the day and the loss of a considerable amount of learning time.

(Table 15.2: Summary of Statutory Consultation Health Concerns Raised to Date Chapter 15 Volume II PEIR)

Additionally, consultation carried out with the Kent Director of Public Health (DPH) revealed the following concerns :

the immediate surrounding area of Manston Airport has low life expectancy and high rates of all-age all-cause mortality in comparison to the rest of Kent

areas likely to be directly affected by the proposal include Newington, Central Harbour and Eastcliff areas of Ramsgate

local health economy is currently struggling to deliver sustainable health care services.
(para 15.3.6 Chapter 15 Volume II PEIR)

The vulnerability of the community of Ramsgate drawn from its socio-economic profile is well captured in a recent piece of work carried out by the Ramsgate Coastal Communities Team, viz:

Ramsgate conforms to the common pattern of seaside towns in the UK with high unemployment, low skills base, poor educational attainment, poor health, an ageing population, and a higher proportion of lone parents on income support and claimants in receipt of disability benefit

Ramsgate was ranked fourth behind Blackpool, Clacton and Hastings in the ONS rankings for Coastal Community Deprivation (2014). The town has high levels of deprivation within four of its seven wards each containing LSOAs² within the bottom decile

Severe income deprivation is found in five of the seven wards and is affects both children and older people. The town is struggling with low education and skills, affecting adults, children and young people. Educational development and attainment is poor particularly in Newington, Northwood and Eastcliff where there is also a higher percentage of children with special educational needs

Residents of Ramsgate have a high incidence of poor health and an average life expectancy significantly lower than the figures for Kent as a whole. Adult obesity levels are high with obesity in children increasing between reception and year six. The prevalence of mental health issues is greater in Ramsgate than the Thanet area as a whole.
(An economic plan for Ramsgate – April 2016)

Noise impacts of RSP proposals

Chapter 14 of the PEIR sets out an assessment of the affects of aircraft noise on the lives of residents of Ramsgate and neighbouring settlements. As a consequence of a large swathe of the built up area of the town lying under the eastern flightpath, the consultants report significant and adverse consequences of RSP's plans for Ramsgate. Two statements draw attention to the seriousness of that impact ;

*The number of aircraft movements increases rapidly between Year 2 and Year 20 and therefore the extents of the Year 20 contour are much greater than the Year 2. In Year 2, 4,852 dwellings are forecast to be exposed to aircraft noise levels above the daytime LOAEL³ of 50 dB L_{Aeq,16hr}, while in Year 20 **13,046** dwellings are forecast to be exposed to noise levels in excess of the daytime LOAEL. In Year 2, 10,512 dwellings are forecast to be exposed to aircraft noise levels above the night time LOAEL of 40 dB L_{Aeq,8hr}, while in Year 20 **16,465** dwellings are forecast to be exposed to noise levels in excess of the night time LOAEL*
(para 12.9.52 Chapter 12 of Volume II of the PEIR)

And

*... significant adverse effects have been identified at the communities of Ramsgate, Pegwell Bay and Manston as a result of the Proposed Development. The effect would be characterised as a perceived **change in quality of life for occupants of buildings in these communities** or a perceived change in the acoustic character of shared open spaces within these communities during the day and night time*
(para 12.9.68 Chapter 12 of Volume II of the PEIR)

Taking this evidence alone demonstrates the very serious and damaging impact of RSP proposals to the

² LSOA Lower Layer Super Output Area

³ LOAEL Lowest observed adverse effect level

health and well-being of the community of Ramsgate and in particular the most vulnerable groups. identified in the above analysis.

6 THE CASE FOR A NATIONAL STRATEGIC INFRASTRUCTURE PROJECT

The central argument underpinning RSP’s claim for Manston as a NISP is its stated **unique** position in being able to fulfill a key strategic role, providing much needed additional airport capacity in London and the South East over the next 30 years.

This claim raises a number of questions and in particular challenges the current Government view that a new and third runway at Heathrow will meet the need for airport capacity in London and the South East over the next 30 years.

(Draft Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England” – Department for Transport, February 2017, repeated in the revised statement of October 2017)

Moreover, it conflicts with the views of AviaSolutions in their Final Report to Thanet District Council last year on the Azimuth and Northpoint Forecasts:

AviaSolutions view is that the provision of airfield and terminal capacity alone is not sufficient to develop financially viable air freight based airport operations as there must be a corresponding demand scenario to support such operations. In the long term, only if additional runway capacity is not delivered at Heathrow / Gatwick is there likely to be excess demand that will spill from the London system to Manston Airport, but that is a very long term, risk-laden investment proposition

(Review of Azimuth and Northpoint Forecast for Manston Airport – Final Report 2017 AviaSolutions)

Our concern is with the issue we focused on in our previous response, namely the credibility of the business case for Manston operating as a major international cargo hub.

The key question which concerns us is the evidence supporting the almost exponential growth in air freight business at Manston. The table below shows the forecast figures for years 2, 10 and 20 against the actuals achieved in last full year of operation, 2013.

| Years | Freight Tonnage | Freight ATMs |
|------------------|-----------------|--------------|
| 2013 actual | 29,306 | 511 |
| Forecast Year 2 | 96,553 | 5,252 |
| Forecast Year 10 | 212,351 | 11,600 |
| Forecast year 20 | 340,758 | 17,170 |

As we noted in our previous submission the air freight business has been flat lining over recent years and is presently well served by the existing operators and freight forwarders and carriers at Heathrow, Stansted and East Midlands airports. So we need to understand on what basis the forecasts were produced and what assumptions were made to justify such a rapid and major increase in dedicated air freight business at Manston.

Azimuth, the consultants responsible for the RSP forecasting, describe their approach to the forecasts as qualitative as opposed to the more usual quantitative method used for aviation forecasting, viz :

Whilst econometric models have been the forecasting method of choice by the DfT, Airports Commission and the EU, these are generally used to forecast passenger air traffic for a country or region. As the ACI says, “Any airport wishing to apply an econometric forecasting approach is advised to begin by examining its historic traffic and

survey data” (ACI, 2011, p. 25). This suffices at country level or for established airports where the past can be used to predict behaviour in the future. However, in the case of Manston Airport, closed for several years and lacking investment for many more, this approach is not appropriate. Any attempt to build an econometric model would have to establish criteria whereby a proportion of the total predicted UK air freight traffic was ‘diverted’ to Manston. However, deciding upon the proportion to divert to Manston raises significant problems.

(para 3.21.4 of Volume II of A National and Regional Asset)

This approach therefore overlooks the 15 or so years when Manston was operational and for which freight handling data is available. The claim of under investment is denied when account is taken of the aspirations of past operators to expand the freight and passenger services and their failure to do as at the loss of some £100 million. Rather, Azimuth bases its extremely ambitious forecasts of future growth on the views of a sample of freight operators, none of which fall into the top 10 list of air freight businesses, and their optimistic views of the potential for market growth given a re-opened Manston.

Again the views of AviaSolutions are relevant

The findings of the stakeholder interviews do however contrast markedly with Avia’s own findings, published by Thanet District Council in September 2016 (“Commercial Viability of Manston Airport”, Chapter 6.3). Avia’s primary research indicated that whilst Manston Airport offered some service quality and processing time benefits, the cargo market did not value these over the remote geographic location which is 3/4 surrounded by the English Channel. When considered against its competitors such as Stansted Airport and East Midlands Airport, the location of Manston Airport and its relative access to the south and south east of the UK is inferior

(para 2.23 Review of Azimuth and Northpoint Forecast for Manston Airport – Final Report 2017 AviaSolutions)

We have to conclude as we did last time that RPS’s forecasts are aspirational and speculative with little underpinning evidence to justify the case for a NSIP and DCO application.

7 CONCLUSIONS

We continue to have grave reservations about RSP’s motivation in pursuing their case for a DCO to re-open Manston and develop it as a major international air cargo hub. Especially when account is taken of the long history of failed attempts by previous operators to achieve their expansion plans at the cost of £100m in losses. Also, when the overwhelming opinion of reputable aviation experts points to yet another Manston failure.

Whatever drives the RSP case it is clear that it comes at a high price for the community of Ramsgate with serious damage to its historic and heritage special character and to health and well-being of its residents. Noise impacts alone are extremely serious as recorded in the evidence from the independent assessment carried out and reported in the PEIR.

In terms of the current Consultation round we conclude that:

The consultation arrangements, in particular the publication of just short of 4000 pages of text, tables, figures with inadequate public events to explain and deal with questions, did not accord with guidance issued by the Government and will need to be repeated

The omission of any consideration in the PEIR of the historic and heritage special character of Ramsgate is untenable. We urge the Planning Inspectorate to insist on a new scoping exercise for the assessment of the Historic Environment to ensure the consultants analysis is extended to take Ramsgate’s historic character into account.

And finally, we continue to be unconvinced by the business case underpinning RSP’s ATM forecasts and believe the case for a NSIP and DCO application remains unjustified.