

SMAa Deadline 5 Written Submission

Gregory Nocentini

Save Manston Airport association

Dear Sirs of the Examination panel.

Thank You Once again for giving me the opportunity to speak before you at the OddFellows Oral Submission Evening Session.

I have attached a copy of my speech, for the purposes of record of submission.

During my oral submission dated 18th March 2017 (Eve session), I quoted a reference from a submission I refuted, but was shouted down in the process. I mentioned it was a direct quote, so as promised, here is the evidence;

Uploaded on PINS portal on 06/03/2019

Document TR020002/TR020002-003514, named; as on PINS portal;

“Deadline 3 Submission - Written Representation Summary - Late submission accepted at the discretion of the Examining Authority on the 4 March 2019”

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003514-Five10Twelve%20Manston%20Written%20Summary.pdf>

Full Document title;

“SUMMARY OF WRITTEN REPRESENTATION
FROM LOCAL BUSINESS AND INTERESTED PARTY, FIVE10TWELVE LTD”

Here is a excerpt from the document. (Refer to appendix A for whole document);

8.3. The actual voices of young people are completely absent from RRs supportive of the Applicant. **Only 4 RRs have been received by young people, (18-24 yrs or younger), all of which are unanimously opposed to the proposal.**

Please note; during my oral submission, I stated the date 17/02/2019 as when the document was submitted.

Please excuse my error here,
The date was meant to read '06/03/2019'

As amended,

*

The primary focus of this oral submission is to refute a submission made by '*Five10Twelve Manston*' named 'SUMMARY OF WRITTEN REPRESENTATION dated ~~17/02/2019~~ 06/03/2019 FROM LOCAL BUSINESS AND INTERESTED PARTY, FIVE10TWELVE LTD'.

*

On to my next point, I compared Manston Airfield to Lydd airfield and quoted figures regarding runway lengths and widths. Please find below the official NATS 'Aerodrome Chart ICAO' and 'Lydd Aerodrome - Textual Diagram'

NATS EGMD Lydd Airport website Link;

[http://www.nats-uk.ead-it.com/public/index.php%3Foption=com_content&task=blogcategory&id=98 &itemid=147.html](http://www.nats-uk.ead-it.com/public/index.php%3Foption=com_content&task=blogcategory&id=98&itemid=147.html)

Figure 1.

Image Link: <https://ukga.com/images/content/image14000.jpg>

Website, showing proximity of danger zones to Lydd Airport;

<https://ukga.com/airfield/lydd/14000>

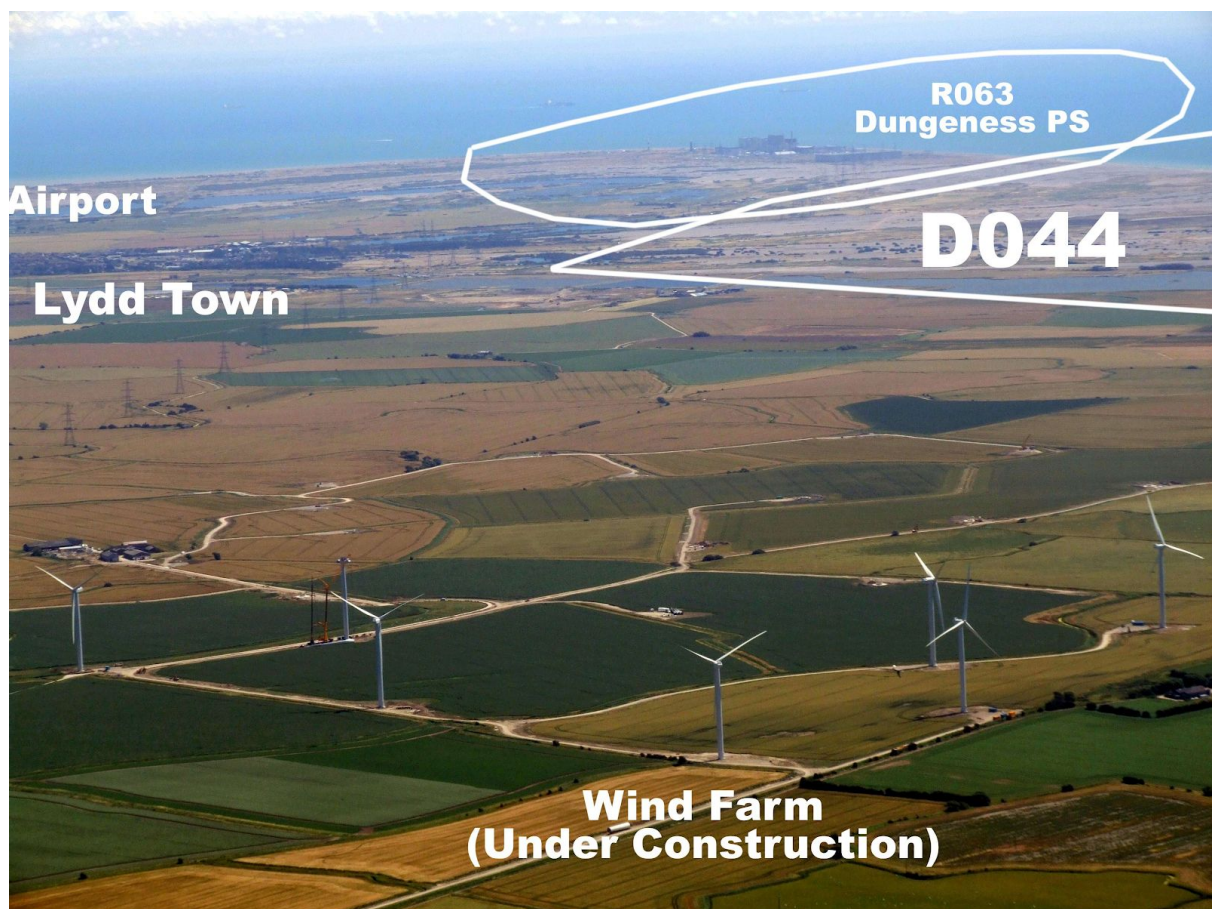


Figure 2: Aerodrome Chart ICAO

Link;

http://www.ead.eurocontrol.int/eadbasic/pamslight-B5B49F508AAA434A5FFB0F8C26928C45/7FE5QZZF3FXUS/EN/Charts/AD/NON_AIRAC/EG_AD_2_EGMD_2-1_en_2018-09-13.pdf

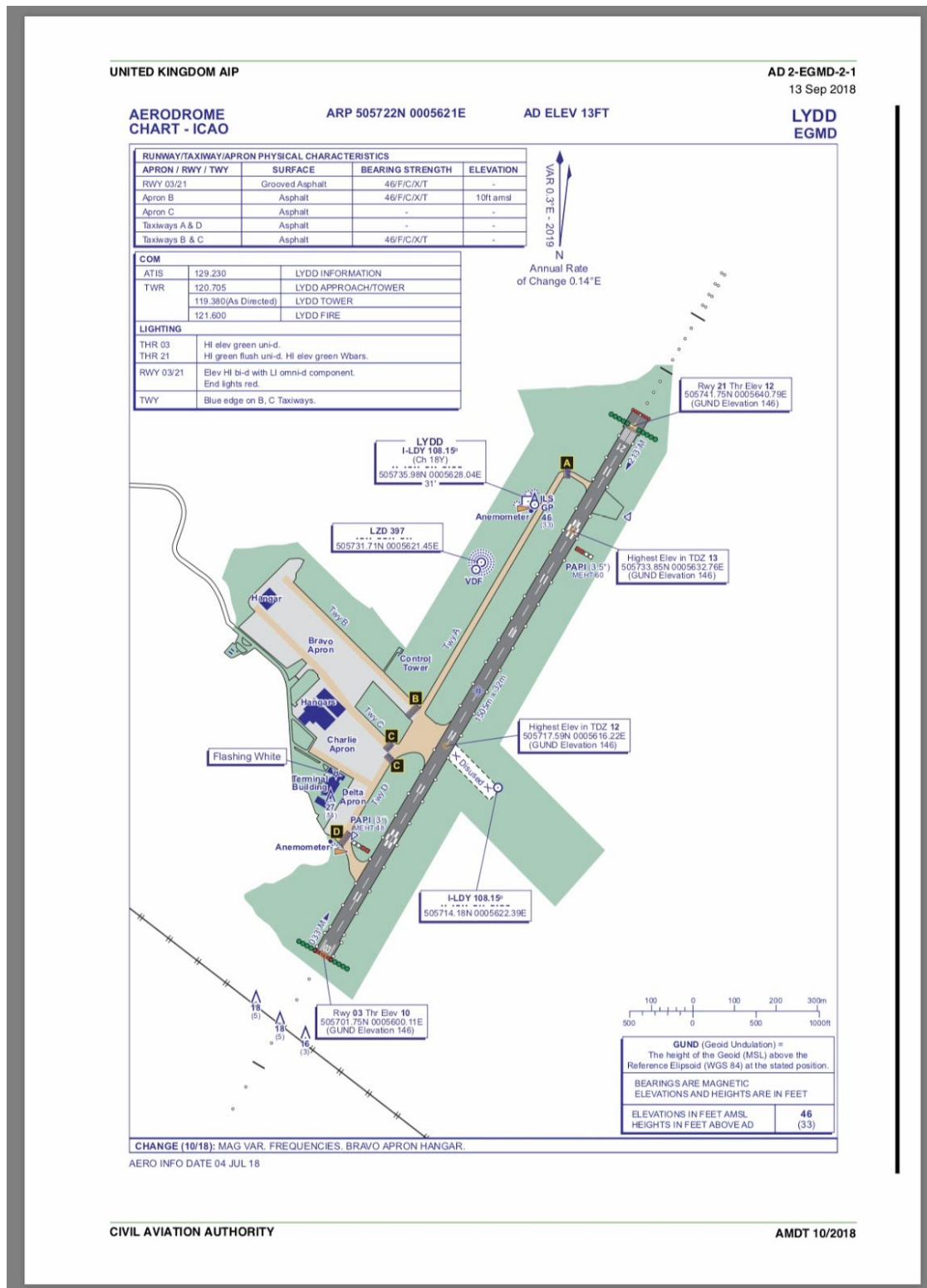


Figure 3; "Lydd Aerodrome - Textual Data" Excerpt

Link;

http://www.ead.eurocontrol.int/eadbasic/pamslight-B5B49F508AAA434A5FFB0F8C26928C45/7FE5QZZF3FXUS/EN/AIP/AD/EG_AD_2_EGMD_en_2019-01-03.pdf

EGMD AD 2.12 RUNWAY PHYSICAL CHARACTERISTICS

Designations RWY Number	True bearing	Dimensions of RWY	Surface of RWY/ SWY/ Strength (PCN)	THR co-ordinates/ THR Geoid undulation	THR elevation/ Highest elevation of TDZ of precision APP RWY	Slope of RWY/ SWY
1	2	3	4	5	6	7
03	032.72°	1505 x 32 M	RWY surface: Asphalt, Grooved PCN 46/F/C/X/T	505701.75N 0005600.11E 146 FT	THR 10 FT	
21	212.73°	1505 x 32 M	RWY surface: Asphalt, Grooved PCN 46/F/C/X/T	505741.75N 0005640.79E 146 FT	THR 12 FT	

SWY Dimensions	Clearway Dimensions	Strip Dimensions	RESA Dimensions, Overshoot / Undershoot	Location/ description of arresting system	OFZ	Remarks
8	9	10	11	12	13	14
						RWY 03
						RWY 21
						Threshold displaced by 35 M to allow for full RESA.

EGMD AD 2.13 DECLARED DISTANCES

Runway designator	TORA	TODA	ASDA	LDA	Remarks
1	2	3	4	5	6
03	1470 M	1799 M	1470 M	1470 M	
21	1505 M	1681 M	1505 M	1470 M	

AMDT 01/2019

CIVIL AVIATION AUTHORITY

UNITED KINGDOM AIP

AD 2.EGMD-5
24 May 2018

EGMD AD 2.14 APPROACH AND RUNWAY LIGHTING

RWY	Approach lighting Type/ Length/ Intensity	Threshold lighting Colour/Wing bars	VASIS/ MEHT/ PAPI/ PAPI Dist from THR	TDZ, lighting Length	Runway Centre Line lighting Length/ Spacing/ Colour/ Intensity	Runway edge lighting Length/ Spacing/ Colour/ Intensity	Runway end lighting Colour/ Wing bars	Stopway lighting Length/ Colour	Remarks
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Manston Airport

EGMH - Kent International Airport

Information

Name	Kent International Airport
ICAO / IATA	EGMH / MSE
Elevation in feet	178

Navigation

Type	Frequ.	Ident	Loc/GS	Rwy	Name
LOC/ILS	111.75	IMSN	281	28	ILS-cat-I
LOC	111.75	MOZ	101	10	LOC
GS/ILS	111.75	IMSN	281/300	28	GS
DME/ILS	111.75	MOZ		10	DME-ILS
DME/ILS	111.75	IMSN		28	DME-ILS

Runways

Rwy	Surface	Width (m)	Length (m)	Blast (m)
10/28	Asphalt	60.96	2743	82

Radio

Type	Name	Frequ.
AWOS, ASOS or ATIS	Manston Information	133.67
Tower	Manston Tower	119.92
Approach	Manston Approach	132.45

<https://apxp.enif.uberspace.de/airport/EGMH/>

Housing and business parks can be erected on small parcels of land... An Airport requires a much larger footprint, there are not many such large sites available in The South East.

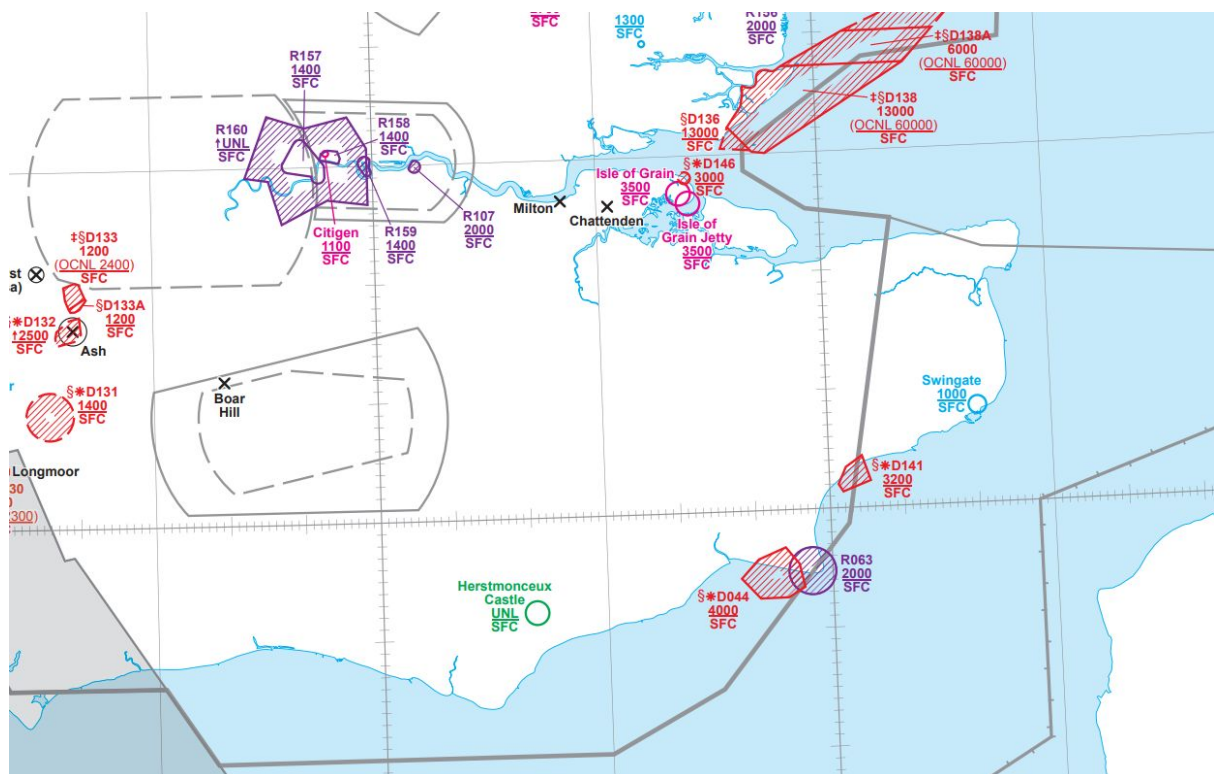
Manston is unique in having a Runway and taxiways already in place, and sufficient acreage available for the construction of the necessary hangarage and other essential infrastructure relevant to a functional cargo hub, passenger facilities and General Aviation functionality.

I then went on to discuss airspace difficulties,

Figure 4; Restricted airspace near Lydd;

‘CHART OF UNITED KINGDOM AIRSPACE RESTRICTICONS AND HAZARDOUS AREAS’

http://www.mantma.co.uk/pdf/eg_enr_6_5_1_1_en.pdf



As we can see here, there are 3 major restrictions near Lydd Airport;

§ D141 H24 - which relates to the Hythe Firing Ranges

Fig. 5 - D141

	ALT 2000	Sponsor: DTE.
EG D141 Hythe Ranges 510419N 0010426E - 510212N 0010531E - 510120N 0010148E - 510158N 0010111E - 510323N 0010214E - 510419N 0010426E.	ALT 3200 SFC	Activity: Live Firing / Demolition. Hours: H24. Service: DAAIS: Lydd Information on 120.700 MHz when open; other times London Information on 124.600 MHz. Remarks: SI 1966/814. Sponsor: DTE.
‡ Note: Aircraft operating in these areas are unable to comply with Rules 8, 9, 10 and 11 (Rules of the Air Regulations 2007). Pilots in the vicinity of these areas are strongly advised to make use of a Radar Service.		
Civil Aviation Authority		AMDT 7/10

ENR 5-1-3-12 (1 Jul 10)

UK AIP

ENR 5.1 — PROHIBITED, RESTRICTED AND DANGER AREAS		
Identification and Name Lateral Limits	Upper Limit (ft) Lower Limit (ft)	Activity Details, Remarks and Byelaw Reference
1	2	3
Danger Areas		

§ D044 H24

Figure 6 - D044

EG D044 Lydd Ranges 505525N 0005534E - 505328N 0005613E - 505238N 0005359E - 505237N 0005015E - 505420N 0004748E - 505554N 0005009E - 505650N 0005348E - 505525N 0005534E.		ALT 4000 SFC	Remarks: DACS: Contact Plymouth Military south of 500000N. Sponsor: HQ Navy. Activity: Live Firing / Demolition. Hours: H24. Service: DAAIS: Lydd Information on 120.700 MHz when open; other times London Information on 124.600 MHz. Remarks: S1 1988/1465. Sponsor: DTE.
‡ Note: Aircraft operating in these areas are unable to comply with Rules 8, 9, 10 and 11 (Rules of the Air Regulations 2007). Pilots in the vicinity of these areas are strongly advised to make use of a Radar Service.			

Civil Aviation Authority

AMDT AIRAC 13/10

ENR 5-1-3-6 (16 Dec 10)

UK AIP

ENR 5.1 — PROHIBITED, RESTRICTED AND DANGER AREAS		
Identification and Name Lateral Limits	Upper Limit (ft) Lower Limit (ft)	Activity Details, Remarks and Byelaw Reference
1	2	3
Danger Areas		
EG D061 Woodbury Common	ALT 1500	Activity: Demolition.

R063 Dungeness - which relates to the Nuclear Power station.

Figure 7 - R063 Dungeness

UK AIP

(16 Dec 10) ENR 5-1-2-1

ENR 5.1 — PROHIBITED, RESTRICTED AND DANGER AREAS		
Identification and Name Lateral Limits	Upper Limit (ft) Lower Limit (ft)	Details Remarks and UK Statutory Instrument (SI) Reference
1	2	3
Restricted Areas		
EG R002 Devonport A circle radius 1 nm centred on 502317N 0041114W.	ALT 2000 SFC	Flight permitted by helicopter for the purpose of landing or taking off from Weston Mil (WML) Helicopter Landing Site (HLS) and Ships within HM Naval Base with the permission of FOST / Plymouth Military Radar and in accordance with any conditions to which permission is subject.
EG R063 Dungeness A circle radius 2 nm centred on 505449N 0005717E.	ALT 2000 SFC	Flight permitted for the purpose of landing at or taking off from the helicopter landing area at Dungeness, with the permission of the person in charge of the installation and in accordance with any conditions to which that permission is subject. Flight permitted by an aircraft which has taken off from or intends to land at London Ashford (Lydd) Airport flying in accordance with normal aviation practice which remains at least 1.5 nm from the position given at column 1 for Dungeness. SI 2007/1929.
A circle radius 3 nm centred on 492546N 0022145W.	ALT 2374 SFC	Flight is not permitted except in conformity with any permission granted by or on behalf of the States of Guernsey Public Services Department. The Island of Sark is within UK territorial waters although within the Brest FIR. Guernsey SI 1985/21.

I used the document titled 'ENR 5.1 - PROHIBITED, RESTRICTED AND DANGER AREAS

Link; <https://shoeburyness.qinetiq.com/downloads/public-safety/restricted-air-space.pdf>

§ D141 H24. Lydd Information on 129.225 MHz, other times London Information on 124.600 MHz.

§ D044 H24 Lydd Information on 129.225 MHz, other times London Information on 124.600 MHz.

R063 Dungeness (i) Flight permitted for the purpose of landing at or taking off from the helicopter landing area at Dungeness. PPR. (II) Flight permitted by an aircraft which has taken off from or intends to land at London Ashford (Lydd) Airport remaining at least 1.5NM from the installation (505449N 0005717E).

The London TMA


<http://www.nats.aero/nsf/TMAPopup.htm>




AERO INFO DATE 30 MAY 14

ATS AIRSPACE VERTICAL LIMITS Controlled airspace with an upper vertical limit of FL195 and above is not shown.					
LONDON		LONDON		LONDON	
TMA-1	A FL195 2500	TMA-6	A FL195 4500	TMA-11	A FL195 4500
TMA-2	A FL195 2500	TMA-7	A FL195 4500	TMA-12	A FL195 5000
TMA-3	A FL195 3500	TMA-8	A FL195 5500	TMA-13	A FL195 5500
TMA-4	A FL195 3500	TMA-9	A FL195 5500	TMA-14	A FL195 5000
TMA-5	A FL195 4500	TMA-10	A FL195 5500	TMA-15	A FL195 5500
				TMA-16	A FL195 5500
				TMA-17	A FL195 FL75
				TMA-18	A FL195 FL75
				TMA-19	A FL195 5500
				TMA-20	A FL195 4500
				TMA-21	A FL195 FL65
				TMA-22	A FL195 5500
				TMA-23	A FL195 5500
				TMA-24	A FL195 4500
				TMA-25	A FL195 5500
LATERAL LIMITS					
See London TMA ENR 2.1					

UK General Aviation Sector in crisis?

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UK GA sector in crisis?

Is the UK general aviation (GA) sector withering on the vine? **LAURIE PRICE** FRAeS looks at why this underappreciated national resource, and the aerodromes that support it, are vital for the wider air transport industry.

In the heady days of 1930's, the UK led the world in production and innovation of light aircraft to supply the increasing demand and interest in aviation that was sweeping the country.

Names like Miles, Whitney Straight, De Havilland, Chilton, were regular features in reports of air shows, air races and record breaking flights. Whilst their pilots such as Cobham, Mollison, and Johnson became national celebrities.

" GA is the foundation for air transport and aerospace recruitment. Without GA, industry is not going to be able to fill all the vacancies in the sector that is so crucial to the UK economy."

A number of significant airfields have closed in recent years, including Filton, Farnborough, Manston, and Plymouth; albeit FlyPlymouth have a scheme to reopen the airport initially based around GA activity, including SEIMC operations. Others remain under threat of housing development, including all GA airfields in Surrey – Fairbairns, Redhill and Dunsfold, leaving Surrey, despite many of its residents working in aviation at Heathrow and Gatwick and in Aerospace, with no operational airfields.

Many other airfields, over 20 in total, such as Old Sarum, North Weald, Blackpool and Wellsbourne are hanging on by a thread, as Government Brown Field designation and local authorities looking for easy wins to solve housing shortfalls threaten their continued existence and airfield operating costs rise and revenues decline. All compounded by CAA airfield licensing requirements and associated costs having forced some airfields to operate as unlicensed, limiting the type of traffic and activity they can accept. The total of licensed airfields having reduced from 144 to 124 (Government GA Policy paper 2015).

With airfield closure, so flying schools and associated maintenance capability and employment has been lost. Even at once thriving GA airfields such as Shoreham, the number of flying schools has reduced. It's a vicious circle, which needs to be broken. The only airfields that seem to be countering that trend are those such as Gloucester where an energetic management has encourage business diversity and those that are now unlicensed.

But with Boeing and Airbus forecasting a requirement for 600,000 new and replacement pilots over next 30 years, if the issue of funding such training can be addressed, it could be the catalyst for the renaissance of UK GA.

<https://www.aerosociety.com/news/uk-ga-sector-in-crisis/?fbclid=IwAR3uEr7X93osNz1yKHs2sP7RECBhj7Xpcgpe7k4RqcGhssZa3kSEsroFD7E>

We need 617,000 pilots by 2035.

BALPA

The screenshot shows the BALPA website header with the logo and navigation links. The main content area features a large image of two pilots in silhouette looking out of an airport window. Below the image is the article title 'Pilot shortage: Fact or fiction' by Wendy Pursey, Head of Membership & Career Services. The article text discusses the global demand for pilots and the challenges faced by the profession. A sidebar on the right contains a search bar and a 'Most popular' section with links to other articles like 'Five tax deductions you may not know about' and 'Captain Dad: a daughter's perspective'.

BALPA

Return to BALPA site

Subscribe

BALPA is the professional association and registered trade union established to represent the interests of all UK pilots

Blog > February 2018 > Pilot shortage: Fact or fiction

Search posts

Most popular

Five tax deductions you may not know about
13 January 2017

Captain Dad: a daughter's perspective
19 May 2017

Surviving the unimaginable
17 January 2018

Flying in high winds - how do pilots do it?
24 February 2017

More than just a plane driver
24 October 2017

Pilot shortage: Fact or fiction

Wendy Pursey
Head of Membership & Career Services

An impending pilot shortage is something aspiring pilots will hear about a lot. A quick search online throws up headline after headline declaring there is a global demand for pilots. At the same time flight training schools want to entice paying customers with promises that it is a great time to become a pilot.

Time after time BALPA is asked if there really is a shortage, and what that means for UK pilots. However, the answer is not as simple as it might first seem, and it depends on which region, type of operation, and pilot experience.

What is clear is that predictions of a severe pilot shortage globally do not reflect the situation being experienced by all British pilots. In fact, BALPA currently has around 500 unemployed pilot members. Many are recently qualified and are trying to secure their first pilot job.

So, let's start with the often-quoted statistics. Manufacturing giants Boeing and Airbus have forecasted the need for as many as 617,000 new pilots by 2035. They state that demand is growing as economies grow and airline fleet numbers expand. In fact, they claim that over the next 20 years, at the current rate of pilots entering the profession, there won't be enough pilots to fly the planes.

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https://blog.balpa.org/Blog/February-2018/Pilot-shortage-Fact-or-fiction?fbclid=IwAR2pINzEjIJdqOqaVP2hTOjR0cgzEvWgK5Oqf4goDQNWDOpx1a_ZWJuwjo0

Just some information regarding sites on local media and the support/opposition to the airport as of 27th March 2019:

Facebook sites that identify as **PRO**:

Save Manston Airport association (group)	3,286
Save Manston Airport association (page)	676
Save Manston Airport (group)	9,400□
Save Manston Airport (page)	160
Supporters of Manston Airport (page)	2700□
Kent Needs Manston Airport (page)	287
THINK! Support Manston (group)	316
Why Not Manston ? (not Facebook)	465

Facebook sites that identify as **AGAINST**:

Manston Pickle (page)	513
No Night Flights over Ramsgate (group)	576
No Night flights (page)	249
Don't save Manston Airport (group)	407

We believe this **speaks volumes**. The general feeling is that people in Thanet and the surrounding area of East Kent in some cases, support the airport. We have a very active member base, that participate in discussions on the groups and pages.

Links to quoted facebook sites

PRO

Save Manston Airport association (group) -

<https://www.facebook.com/groups/savemanstonairportassociation/>

Save Manston Airport association (page) -

<https://www.facebook.com/savemanstonairportassociationofficial/>

Save Manston Airport (group) -

<https://www.facebook.com/groups/savemanstonairport/>

Save Manston Airport (page) -

<https://www.facebook.com/Save-Manston-Airport-117711438800070/>

Supporters of Manston Airport (page) -

<https://www.facebook.com/supportmanstonairport/>

Kent Needs Manston (page) –

<https://www.facebook.com/KentNeedsManstonAirport/>

THINK! Support Manston (group) -

<https://www.facebook.com/groups/679914372082220/>

Why Not Manston ? (Not Facebook) –

<http://whynotmanston.org/>

AGAINST

Manston Pickle (page) -

<https://www.facebook.com/manstonpickle/>

No Night Flights over Ramsgate (group) -

<https://www.facebook.com/groups/143845528678/>

No Night flights (page) -

<https://www.facebook.com/nonightflights/>

Don't save Manston Airport (group) -

<https://www.facebook.com/groups/1513910555578401/>

Oddfellows PINS Oral Submission 18/Mar/2019

Dear sirs,

Good evening and Thank You for giving me the opportunity to speak before you today.

* 《 once again, for the sake of clarity, I am representing the Save Manston Airport association for this oral submission 》 *

Just a quick introduction, I'm 20 years old approaching 21, (am training as a pilot) and am currently employed by a major airline based out of Heathrow.

I am also a committee member of the Save Manston Airport association, and have been since I was 17 years old.

The primary focus of this oral submission is to refute a submission made by 'Five10Twelve Manston' named 'SUMMARY OF WRITTEN REPRESENTATION dated 17/02/2019 FROM LOCAL BUSINESS AND INTERESTED PARTY, FIVE10TWELVE LTD'.

Section 8.3 states,

《 and I quote: 》

“ The actual voices of young people are completely absent from Relevant Representations supportive of the application. Only 4 relevant representations have been received by ‘young people ages 18-24 or younger’ all of which are unanimously opposed to the proposal”

《 End quote 》

I believe this statement is incorrect, and was made as an attempt to mislead the panel.

I myself put in a Relevant Representation supporting the application, falling within the brackets of 18-24 years old - which immediately proves the quoted submission as incorrect.

Furthermore, to the best of my understanding, it isn't required for a Relevant Representation submitter to disclose/include their age on said submission; therefore it is safe to say that it is possible more Relevant Representations were made by 18-24 year olds in support of the application, as we have seen throughout this campaign.

Onto my second point

My secondary focus of this oral submission, and I'll be brief, is the difference between Manston and Lydd Airport, and as to why, from a pilot's perspective, Manston is a far better airfield for pilot training.

Lydd has one runway, which is (4,938ft / 1,505m) in length and (104ft/32m) in width, compared to Manston which is 9,016ft / 2,748m (200ft/62m) in width; making the runway at Manston more attractive for general aviation, as well as more specifically, larger GA aircraft such as private jets.

Following on from one of our previous submissions, GA is a fast growing, expansive sector within the aviation industry , and in the UK alone, generates '£1.4billion for the UK economy, contributing 12,000 jobs'

As well as sitting on a larger site, Manston is the ideal location in the south East due to airspace availability. Manston sits in Class G airspace, or uncontrolled which requires little control from Atc/

The closest major airspace to Manston is the Worthing CTR which sits at FL65 and above, and to the north, the Clacton CTA which sits at FL85 - altitudes which GA aircraft rarely fly to.

Lydd on the other hand sits right below the London TMA, the busiest airspace in the UK, at 5,500 ft. There are also several danger sites within close proximity of Lydd Airport;

§ D141 H24

§ D044 H24

R063 Dungeness

I will be including images and evidence in my written response.

In conclusion, I believe, from my own experience, that a majority of young people support this proposal, as a way to further education and career advancement. They are correct, Boeing and Airbus have predicted 617,000 new pilots are needed by 2035 and there are not enough pilots being trained to fly all these aircraft.

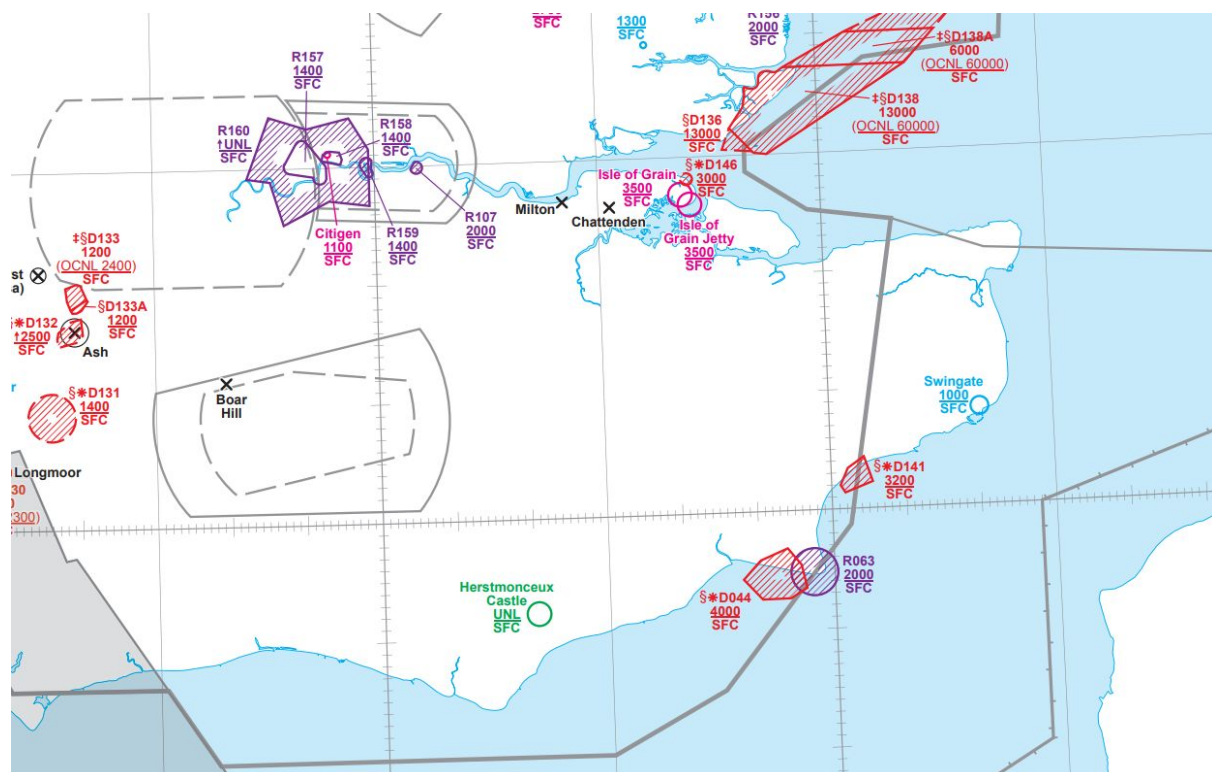
Thank You.

Danger zones and limitations around Lydd

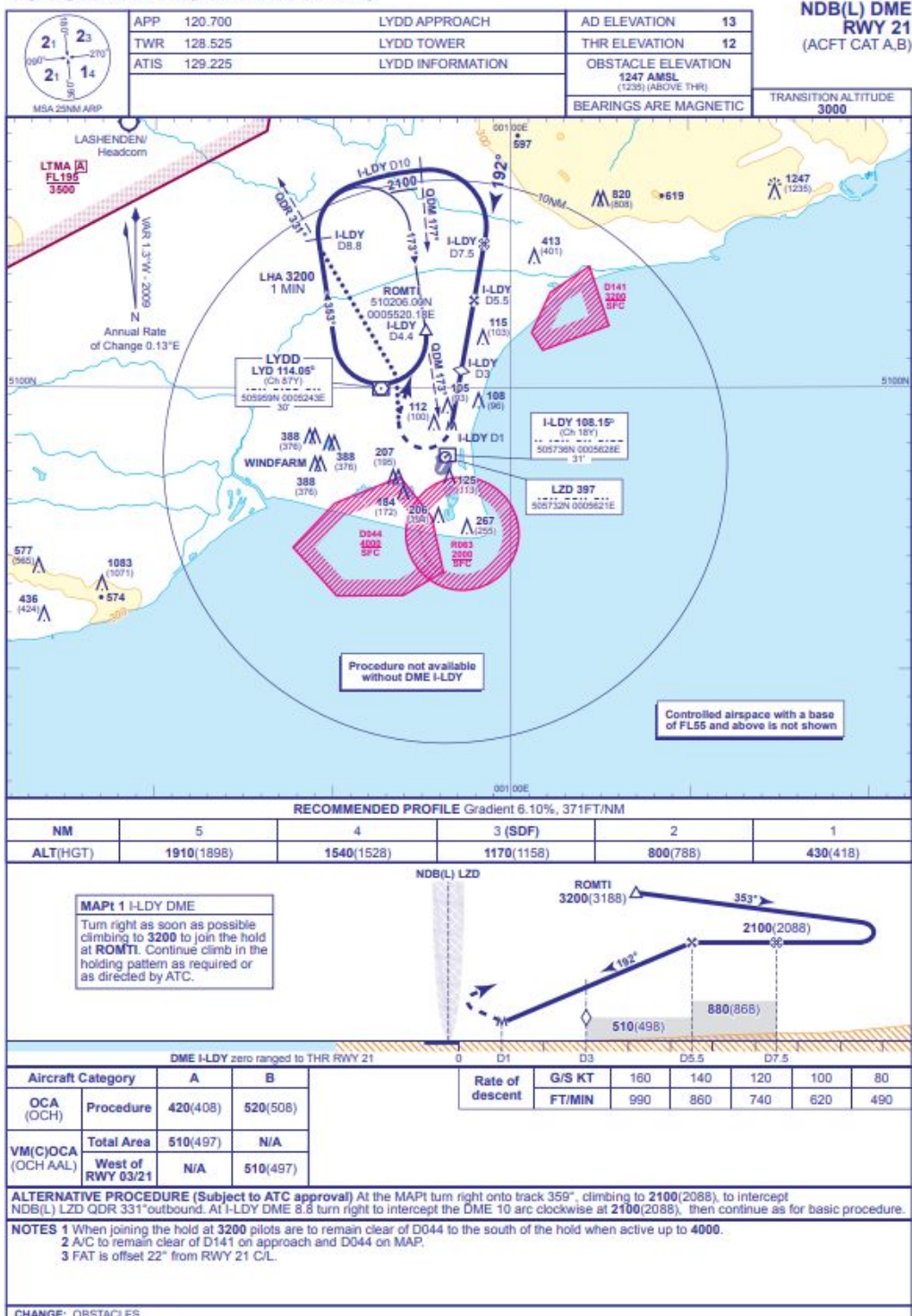
§ D141 H24. Lydd Information on 129.225 MHz, other times London Information on 124.600 MHz.

§ D044 H24 Lydd Information on 129.225 MHz, other times London Information on 124.600 MHz.

R063 Dungeness (i) Flight permitted for the purpose of landing at or taking off from the helicopter landing area at Dungeness. PPR. (II) Flight permitted by an aircraft which has taken off from or intends to land at London Ashford (Lydd) Airport remaining at least 1.5NM from the installation (505449N 0005717E).

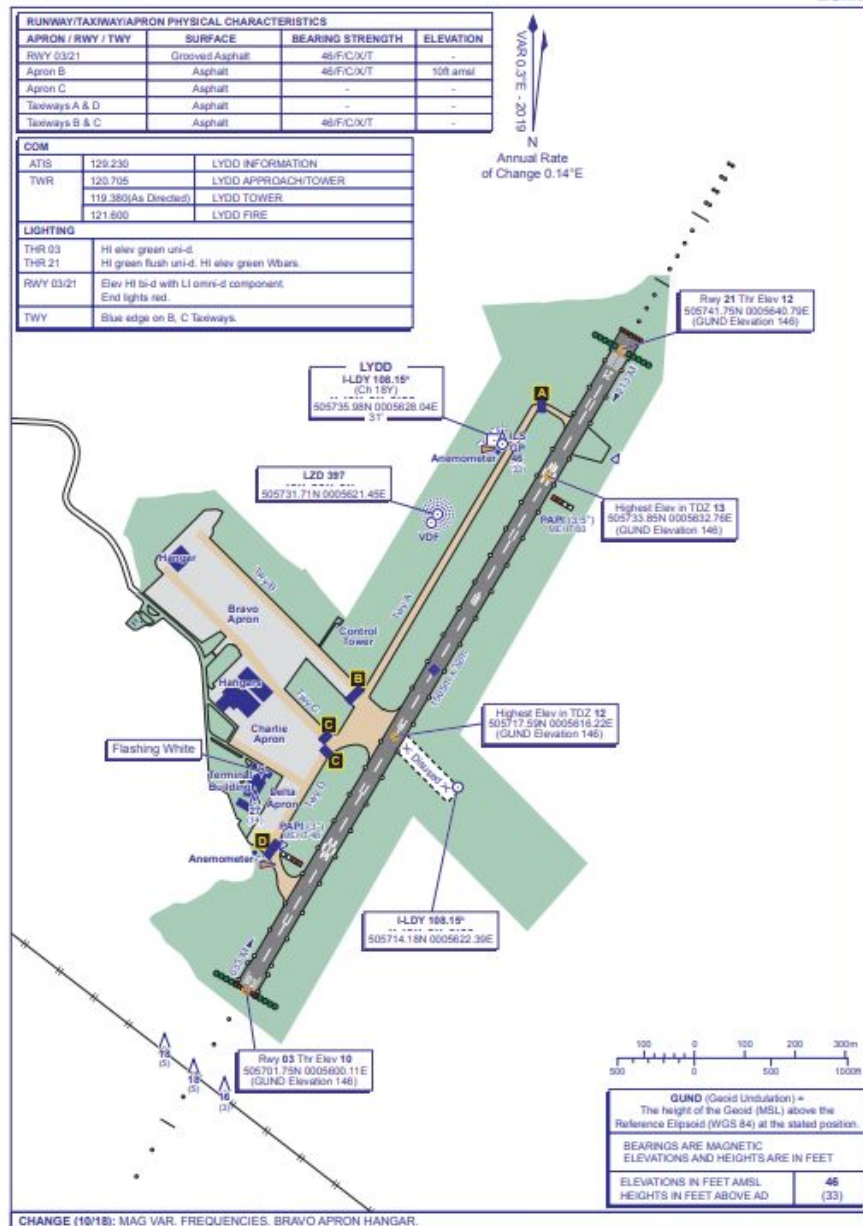


INSTRUMENT APPROACH CHART - ICAO



LYDD
EGMD

COM	
ATIS	129.230 LYDD INFORMATION
TWR	120.705 LYDD APPROACH/TOWER
	119.380(As Directed) LYDD TOWER
	121.600 LYDD FIRE
LIGHTING	
THR 03	Hi elev green uni-d.
THR 21	Hi green flash uni-d. Hi elev green Wbars.
RWY 03/21	Blv Hi bi-d with LI omni-d component. End lights red.
TWY	Blue edge on B, C Taxiways.



CHANGE (10/18): MAG VAR. FREQUENCIES. BRAVO APRON HANGAR
AERO INFO DATE 04 JUL 18

AMDT 10/2018

http://www.ead.eurocontrol.int/eadbasic/pamslight-FCC3775452B58FB34D48101CA0B2320C/7FE5QZZF3FXUS/EN/Charts/AD/NON_AIRAC/EG_AD_2_EGMD_2-1_en_2018-09-13.pdf

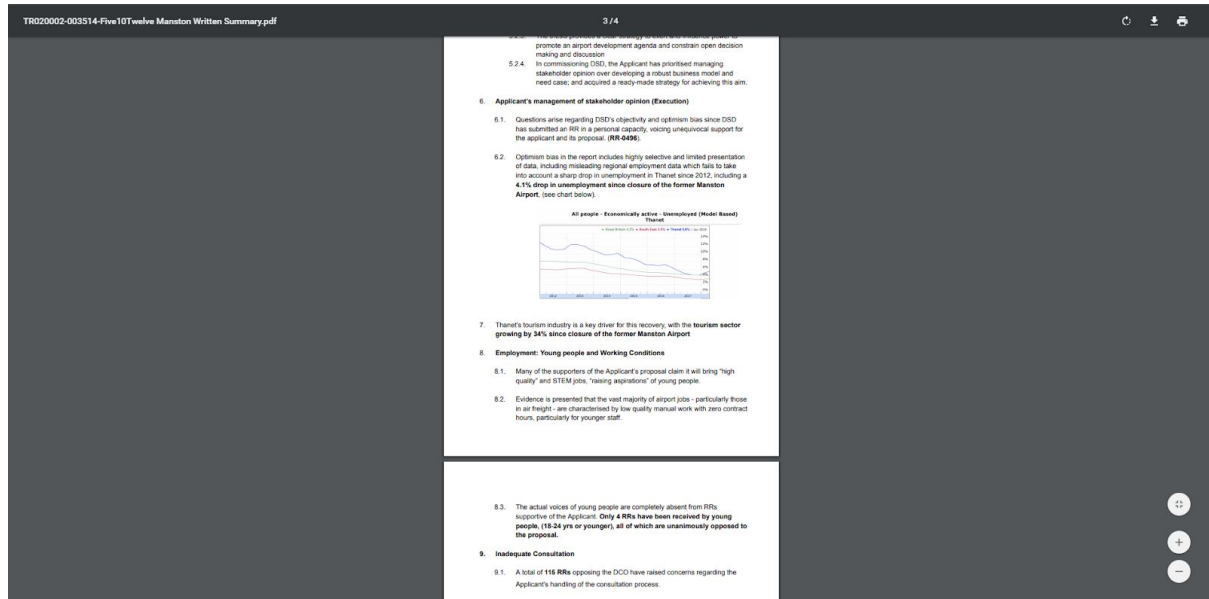
http://www.ead.eurocontrol.int/eadbasic/pamslight-FCC3775452B58FB34D48101CA0B2320C/7FE5QZZF3FXUS/EN/AIP/AD/EG_AD_2_EGMD_en_2019-01-03.pdf

<https://apxp.enif.uberspace.de/airport/EGMH/>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003653-Christine%20Redmond%20-%20Response%20to%20Deadline%204.pdf>

http://www.mantma.co.uk/pdf/eg_enr_6_5_1_1_en.pdf

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003514-Five10Twelve%20Manston%20Written%20Summary.pdf>



7. Thanet's tourism industry is a key driver for this recovery, with the **tourism sector growing by 34% since closure of the former Manston Airport**

8. **Employment: Young people and Working Conditions**

- 8.1. Many of the supporters of the Applicant's proposal claim it will bring "high quality" and STEM jobs, "raising aspirations" of young people.
- 8.2. Evidence is presented that the vast majority of airport jobs - particularly those in air freight - are characterised by low quality manual work with zero contract hours, particularly for younger staff.

8.3. The actual voices of young people are completely absent from RRs supportive of the Applicant. **Only 4 RRs have been received by young people, (18-24 yrs or younger), all of which are unanimously opposed to the proposal.**

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