

From: [REDACTED]
Sent: 11 June 2021 15:29
To: NI Enquiries <NIEnquiries@planninginspectorate.gov.uk>
Subject: Re: Manston Airport (TR020002)

Sirs, Thank you for this update.

I am the leader of Thanet Independents, a political party registered with the Electoral Commission.

I write with the full support of all our members but also as an individual who lives in Ramsgate.

I have been a serving District and Town Councillor for over 6 years and was elected on a promise to do all I could to support the re-opening of Manston.

Airport.

Politics, being what they are has meant that occasionally the largest group in Chambers has spoken against the airport but never offered any alternatives to secure future employment for local people.

I and my party believe that a fully functioning airport is crucial to regenerating our area.

We are one of the poorest in the south east of UK and need help and infrastructure to create a future for our children.

We are close to two universities and airport plans include engagement with them offering courses connected to aviation and supporting industries.

Recently we were able to use our votes to support the Conservative group in regaining control of Thanet District Council. The Council now has a majority of 32 - 19 in favour of supporting a decision to allow the DCO. The remaining 5 have not expressed an opinion in chambers.

We are looking to enhance the use of the Port, to encourage the development of the high speed rail link AND to open the airport to ensure that Thanet truly is open for business and economic development.

RSP of course, own the land and it has been protected in our extant local plan for aviation use only.

I respectfully request that the decision to grant the DCO is once again a positive one and permission given so that these investors can get on with their amazing project and breathe lifeblood into our communities.

Kind regards Cllr. Rev. Stuart Piper

FOR THE ATTENTION OF THE MANSTON AIRPORT CASE TEAM

FROM...CLLR. REV. STUART PIPER.

Councillor, Thanet District Council

Councillor, Ramsgate Town Council

RESPONSE TO INVITATION TO WRITE REGARDING MANSTON AIRPORT

Sirs,

In my response I try to concern myself with the specific points raised in the letter inviting responses. I do not see this as an opportunity to rehearse old arguments but should say at the outset that I accepted the original decision to grant the DCO as a decision well-made which considered the needs of our area and its development long into the future.

1A - POLICIES

"The extent to which current national or local policies (including any changes since 9 July 2020 such as, but not limited to, the re-instatement of the ANPS*) inform the level of need for the services that the Development would provide and the benefits that would be achieved from the Development".

****ANPS is the Airports National Policy Statement***

Policies

1) Thanet District Council Local Plan

This was adopted in July 2020. On page 30 of the plan there is the TDC Policy (SP07) on Manston Airport which safeguards it for airport related activities.

TDC Adopted Local Plan :

<https://www.thanet.gov.uk/.../Thanet-Local-Plan-July-2020...>

2) Airports National Policy Statement (ANPS)

Following a legal challenge, the ANPS was reinstated. As such it is not a new Policy. It also applies predominately to the case for the 3rd runway at Heathrow.

However, the completion of that is a long way off and the ANPS does refer to "Making Best Use" of existing runways.

(See 1.39, 1.41 and 1.42 on pages 11 and 12 plus 2.28 on pages 17 and 18).

It also indicates the Need for Air Freight (see 2.7 on page 14) and the Need for increased Airport Capacity (see 2.10 to 2.18 on pages 15 and 16).

1B - BENEFITS OF THE DEVELOPMENT

Thanet has high unemployment and levels of deprivation.

Kent Unemployment :

<https://www.kent.gov.uk/.../District-unemployment...>

Deprivation :

<https://www.kent.gov.uk/.../Indices-of-Deprivation...>

Unemployment and Deprivation have negative health implications and reduce life expectancy.

Health Inequalities :

<https://www.kingsfund.org.uk/.../what-are-health...>

This has been made worse by the pandemic.

Unemployment, deprivation, mental health and COVID :

<https://www.health.org.uk/.../emerging-evidence-on-covid...>

(see headings Job and financial loss and Housing insecurity and quality).

Benefits

The development will provide training and jobs for locals which will reduce unemployment and deprivation. (see table below from Volume IV page 28 of the Azimuth report which can be referenced as [APP-085]). This will have positive health effects.

Also, from the Azimuth report on the same page:

"5.1.8 In Europe, direct jobs at airports generally breakdown as follows (Intervistas, 2015, p. 27 " – percentage does not add to 100 due to rounding):

- Airlines 28%
- Ground handling 14%
- Airport and Air Traffic Control 14%
- Retail and other in-terminal services 6%
- Airport security and passenger screening 6%
- Customs, immigration and government jobs 5%
- Ground transport 5%
- Food and beverage 8%
- Maintenance, Repair and Overhaul (MRO) 6%

(Other 7%)

2A - EFFECT OF COVID

"Whether the quantitative need for the Development has been affected by any changes since 9 July 2019, and if so, a description of any such changes and the impacts on the level of need from those changes (such as, but not limited to, changes in demand for air freight, changes of capacity at other airports, locational requirements for air freight and the effects of Brexit and/or Covid)".

COVID

One effect of Covid has been to considerably reduce the number of passenger flights. This has illustrated the fact that the UK has an over-reliance on bellyhold freight and a consequent lack of freighter capacity.

IATA Freight recovery :

<https://www.iata.org/en/pressroom/pr/2021-03-02-01/>

Trade demand is set to grow increasing the demand for air freight:

World Trade Organisation - Global Trade Growth :

https://www.wto.org/english/news_e/pres21_e/pr876_e.htm

The Covid Pandemic has had a huge effect on e-commerce. Click on the link and scroll down to section 4, Online Retail, and please read this section.

ONS retail data :

<https://www.ons.gov.uk/.../bulletins/retailsales/may2021>

Click on the link below and then click on the "e-commerce strategies for Air Cargo airlines.

Scroll to page 2 for the 5 strategies for airlines:

IATA e-commerce :

<https://www.iata.org/.../cargo.../e-commerce-logistics/>

The growth in e-commerce will increase the demand for dedicated freighters.

Qatar Airlines hungry for freighters :

<https://www.aircargonews.net/.../qatar-airways-hungry.../>

Please see also this article by Alex Veitch which is particularly relevant

Soaring e-commerce and the need to support aviation

25 / 06 / 2021

By Alex Veitch, Logistics UK's general manager of public policy

Alex Veitch

At the start of June, Logistics UK partnered with Aberdeen Standard Investment's AIPUT (Airport Industrial Property Unit Trust) to present government with a call for action over the future of air freight, writes Logistics UK's Alex Veitch.

In the proposals presented, 11 key recommendations were made to enable the UK to facilitate the sustainable growth of its vital airfreight industry.

One of these recommendations focused on consumer behaviour. According to Logistics UK's Logistics Report 2021, online retail averaged 28.1% of retail sales in 2020, a large increase compared to 19.2% in 2019.

While e-commerce was on the rise prior to the pandemic, Covid-19 has seen consumers relying on online shopping and doorstep deliveries more than ever before. And consumer behaviours over the course of the pandemic, and recent years, have also changed; just-in-time and next day deliveries – often at low, or no, delivery costs – are no longer an ambition, but have become an expectation.

To support this demand, express freight airlines operate a significant number of services. However, with the UK one of the top three online shopping nations around the globe, industry must continue to innovate.

Logistics UK is calling on government to facilitate the movement of airfreight throughout the day and, where possible, at night to keep goods moving and reaching their end customers in good time.

Included in the 11 key priorities – and to be explored in future columns – were infrastructure, the need for government to promote and develop a positive public perception of aviation, innovation, decarbonisation and airfreight growth.

A healthy airfreight sector is a crucial part of the new digital economy and must be recognised and supported as such. Logistics UK will continue to work with government and the aviation industry to ensure air freight is able to reach its full potential as a key driver of economic growth and as a crucial component of a Global Britain.

Alex Veitch is Logistics UK's general manager of public policy

2B - EFFECT OF BREXIT

Post Brexit

In February the Airport Industrial Property Unit Trust and Logistics UK held a policy roundtable, with representatives across the airline industry, to discuss the future of air freight. As a result, a report was produced which outlined the priorities.

Priorities for the air freight industry :

<https://logistics.org.uk/.../Logistics-UK-call-to-action...>

Leaving the EU has enabled trade deals with other countries:

Japan Trade Deal :

<https://www.gov.uk/.../uk-and-japan-sign-free-trade...>

Australian Trade Deal :

<https://www.gov.uk/.../uk-agrees-historic-trade-deal-with...>

Covid and Brexit have highlighted the potential problem of a temporary closure to the Port of Dover and the potential for future blockades.

This is a major problem for perishable goods:

Perishable goods through Dover :

<https://www.mirror.co.uk/.../port-dover-closed-fears-food...>

Dedicated Freighters would alleviate this problem.

3 – SIXTH CARBON BUDGET

"The extent to which the Secretary of State should, in his re-determination of the application, have regard to the sixth carbon budget (covering the years between 2033 – 2037) which will include emissions from international aviation".

BACKGROUND

The Climate Change Committee (CCC) have been making a number of recommendations to Government who have responded:

Government response 1 : Pages 31 to 34

<https://assets.publishing.service.gov.uk/.../government...>

The latest CCC report is the Sixth Carbon Budget and there is an aviation summary.

Use the link below to open the main report. Scroll down and then open the Aviation summary.

The key recommendations are summarised in table P8.1 on page 29.

CARBON BUDGET :

<https://www.theccc.org.uk/publication/sixth-carbon-budget/>

The Government has already established the Jet Zero Council:

Jet Zero Carbon Free flight :

<https://www.gov.uk/.../prepare-for-lift-off-jet-zero...>

The Government have also signed up to the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA).

The link below is useful to find out more about CORSIA particularly 1.2, 1.6 and 2.14.

CORSIA frequently asked questions :

https://www.icao.int/.../CORSIA_FAQs_December%202020...

The government response to the Sixth Carbon Budget:

Government response to Sixth Carbon Budget :

<https://www.gov.uk/.../uk-enshrines-new-target-in-law-to...>

Sirs, As a local resident and elected representative for over 6 years serving on two of the councils in this area, I have always been of the opinion that the majority of residents favour the re-opening of this airport. The vast majority of my email traffic from residents is positive and local people long for the area to realise its potential.

This is never going to happen without major investment and a necessary change to our current status. We have high levels of deprivation, caused by unemployment and lack of opportunities. We have poor health in our community and an attitude of hopelessness in the future.

Many people fear that the area will become a dormitory for people who sleep here but work in the city so have no real ties to the community.

There is a fair amount of inward migration from London which is pricing local people out of the housing market and their hopes of achieving property ownership or even a high standard of rented accommodation are limited by their poor financial circumstances. People need work and job opportunities require investment.

We need this airport to regenerate all our communities and breathe new lifeblood into Thanet and the surrounding areas.

I urge the Secretary to confirm his earlier decision and allow this development to proceed.

Kind regards, Stuart. (Cllr. Rev. Stuart Piper)

From: [REDACTED]
To: [Manston Airport](#)
Subject: Response to invitation to write.
Date: 24 June 2021 23:15:42

Sirs,

Thank you for this update.

I am the leader of Thanet Independents, a political party registered with the Electoral Commission.

I write with the full support of all our members but also as an individual who lives in Ramsgate.

I have been a serving District and Town Councillor for over 6 years and was elected on a promise to do all I could to support the re-opening of Manston.

Airport.

Politics, being what they are has meant that occasionally the largest group in Chambers has spoken against the airport but never offered any alternatives to secure future employment for local people.

I and my party believe that a fully functioning airport is crucial to regenerating our area.

We are one of the poorest in the south east of UK and need help and infrastructure to create a future for our children.

We are close to two universities and airport plans include engagement with them offering courses connected to aviation and supporting industries.

Recently we were able to use our votes to support the Conservative group in regaining control of Thanet District Council. The Council now has a majority of 32 - 19 in favour of supporting a decision to allow the DCO. The remaining 5 have not expressed an opinion in chambers.

We are looking to enhance the use of the Port, to encourage the development of the high speed rail link AND to open the airport to ensure that Thanet truly is open for business and economic development.

RSP of course, own the land and it has been protected in our extant local plan for aviation use only.

I respectfully request that the decision to grant the DCO is once again a positive one and permission given so that these investors can get on with their amazing project and breathe lifeblood into our communities.

Kind regards Cllr. Rev. Stuart Piper

From: [REDACTED]
To: [Manston Airport](#)
Subject: For Attention of Manston Airport Case Team
Date: 09 July 2021 15:54:02
Attachments: [P. Forbes Manston.docx](#)
[Draft report - Peter Forbes - Council 7 July 2021.pdf](#)

Dear James.

I am writing to you regarding the Ramsgate Town Council Correspondence you received recently. The records at the council will show that 4 members of the council objected in the strongest possible terms to the engagement of Mr Peter Forbes by the Council and objected again to the acceptance and onward transmission of his report.

The votes, when taken were recorded and Cllrs S. Piper, L. Piper, G. Rusiecki and B. Young had their objections noted.

There are issues at RTC which are about to be investigated regarding non-disclosure of Interests and other details regarding the manner in which the council was persuaded, with no prior warning or opportunity to elect any other 'expert', to engage him to write the Council's response.

It is known that among other issues he has a very negative opinion of RSP, their intentions and of Mr Tony Freudman in particular.

You will have received his report via RTC. I attach a report drawn from his own webpage which contains very personal views about RSP and Tony Freudman.

We cannot see how he can have been considered an independent expert since he is clearly predetermined on the matter.

We would ask that our concerns are brought to the attention of the SofS.

The first attachment is his own report written some 18 months or so ago. It contains his personal statements and opinions.

The second attachment is his report to Ramsgate Council.

Both reports use the same photograph.

For this exercise residents were again asked to write to Ramsgate Council to express their views on the matter.

As before, on this occasion there were more letters supporting the airport than against the airport.

Kind regards

Cllr. Rev Stuart Piper, Ramsgate Town Council.



A personal view – Peter Forbes, Director, Alan Stratford and Associates

The approval of the Development Consent Order (DCO) for a major cargo hub at the disused Manston Airport is a highly controversial and political decision by the UK Department for Transport. But is this in the best interests of the UK aviation sector and the local community in East Kent? In this article, I offer my personal view as to why I feel that this decision, which over-ruled an earlier recommendation by the Planning Inspectorate, is flawed and will only potentially benefit the developer rather than provide the promised 23,000 new jobs both to the local area and across the UK as a whole.

I should firstly advise that I have been personally involved with Manston airport over a number of years – initially providing consultancy advice through my company, Alan Stratford and Associates, to the then-owner, the Wiggins Group and subsequently to Thanet District Council (TDC). More recently I carried out a feasibility study for a private investor interested in acquiring the site and re-opening the airport. The main conclusion of this study was that, whilst a small-scale freight / passenger airport might just be commercially viable, the real value was in the sale of all (or part) of the land for housing development.

However, since this study, the economic landscape has changed through the impacts of Brexit, Covid-19 and several smaller UK regional airports have either closed or are struggling financially. In the case of Manston, there was also a key issue as to whether permission for night flights would be granted from TDC, which would strongly impact on the relatively modest levels of dedicated freighter traffic that might be achievable. In the end, the potential investor did not proceed further. I am not currently working for any group involved with the airport.

Manston's history

In assessing this project, it is useful to review the airport's history. The airport was originally an RAF station with dual RAF and civilian use but was sold by the Ministry of Defence in 1999 to the Wiggins Group, a publicly-quoted property investment company. The Wiggins Group, who rebranded themselves as Planestation developed Manston primarily for low-cost UK operations. During 2004 and 2005, the Irish airline, EUjet based up to seven B737 aircraft at the airport for UK domestic and European short-haul operations. Planestation subsequently purchased a stake in the airline. The venture, however was short-lived and Planestation went into liquidation in July 2005. Later that year the airline was purchased by Infratil, a New Zealand-based company, who also owned and operated Prestwick Airport. Infratil marketed the airport primarily for freight. There was some hope that it might be recognised as an overspill London airport for passenger traffic although this never materialised due to its location and poor surface access. From 2010 onwards, traffic levels declined and the airport became financially unviable, reportedly losing over £3.0m a year just prior to its closure in 2013.

Later in 2013, the site was sold to Ann Gloag, a Scottish entrepreneur, reportedly for £1.00. She subsequently sold it on Stone Hill Park, a property company, who intended to develop the site with plans for some 4,000 homes and a business park, whilst retaining a 'heritage' airport for vintage aircraft and other light aviation. Although proposals for some housing at the site were included in Thanet District Council's Draft Local Plan, these were subsequently rejected by Councillors in favour of retaining Manston for freight and passenger use. In July 2019, Stonehill Park sold the airport to RiverOak Strategic Partners (RSP) reportedly for some £16.5m. RSP plan to develop Manston as a major freight airport with some limited passenger traffic. Planning consent for this has been now given through a Development Consent Order (DCO) approved on behalf of the Secretary of State for Transport, although this was against the recommendations of the Planning Inspectorate examining panel. A local community group has vowed to raise funds to challenge this decision through a Judicial Review.

Manston Airport - Passengers & Cargo (tonnes) handled		
	Passengers	Cargo (tonnes)
2003	3,000	43,026
2004	101,000	26,626
2005	204,000	7,612
2014	40,000	3,701
Source: CAA Statistics		

In order to fulfil the requirements of the DCO, RSP needed to show that the airport was a significant national infrastructure development with a minimum of 10,000 ATMs per annum. Under RSP's forecasts, Manston would handle some 181,436 tonnes of cargo with 10,144 cargo ATMs by Year 6 of its operation. Passenger traffic was forecasted at 965,925 by Year 6 and 1,307,259 by Year 18. The development is

forecasted to create some 23,235 direct, indirect and induced jobs – of which 3,417 were direct jobs at the airport itself. This compares against the total of just 150 jobs at Manston when the airport closed.

Location is too remote

In terms of freight, the key disadvantage of Manston is its location at the extreme SE corner of the UK and its poor surface access. Historic traffic levels at the airport have generally been modest and it has never been to compete with East Midlands and Stansted – the UK's two largest airports for dedicated freighter traffic, which account for some 71.7% of all cargo handled by dedicated freighter aircraft. The increased onward distribution times at Manston are particularly relevant for perishable goods which comprise a significant proportion of all dedicated freighter cargo. In addition, the inability to offer night flights at the airport, which is a condition of the DCO, will be a significant constraint for the development of a freight hub, particularly for main international freight package couriers such as Fedex, UPS and DHL. Similar considerations apply for passenger traffic as the catchment area population is relatively small. This is unlikely to increase significantly beyond perhaps a handful of UK domestic and European routes even with a new rail station at Thanet Parkway, located some 3/4 miles from the airport. The conclusion that the proposed development of Manston would not be commercially viable is also made in reports by two other aviation consultants, York Aviation and AviaSolutions.

UK airports - Cargo handled (freighter aircraft) - 2019				
	Cargo (tonnes)	%	ATMs	%
East Midlands	335,947	43.5%	23,202	40.3%
Stansted	217,265	28.2%	10,208	17.7%
Heathrow	83,757	10.9%	2,728	4.7%
Prestwick	13,047	1.7%	764	1.3%
Other	121,630	15.8%	20,633	35.9%
Total UK	771,646	100.0%	57,535	100.0%
Manston (Year 6)	181,436		10,144	

Source: CAA statistics

It might be argued that the UK air freight market will grow substantially over the coming decades. Prior to Covid-19, Boeing forecasted that the global air freight market would grow by some 4.2% pa over the next 20 years. However much of the growth will be in passenger bellyhold rather than dedicated freighter cargo (bellyhold currently accounts for 70% of all UK air cargo) and, in practice, the dedicated freighter market in the UK is highly fragmented and has shown relatively little growth in the past decade.

UK airports - Cargo handled (freighter aircraft) - 2019 v 2009		
	Cargo (tonnes)	ATMs
2009	690,080	55,623
2019	771,646	57,535
Annual growth	1.1%	0.3%
Source: CAA statistics		

Apart from the international freight couriers, the all-cargo airlines operating in the UK, such as Cargolux and AirBridgeCargo, are already well-established at other airports and will be reluctant to move to Manston. This also applies to the freight subsidiaries of the passenger airlines, several of which operate dedicated freighter aircraft. The UK's only all-cargo airline, CargoLogicAir, which leases two B747F aircraft, temporarily suspended operations in February this year due to a lack of demand, although these have recently recommenced following the Covid-19 pandemic. This may however, be short-term as any growth of the UK air freight market is likely to be impacted by the aftermath of the pandemic, Brexit and a potential economic recession.

No clear need for the Development

Given the fact that Manston was historically unable to develop significant levels of freight and/passenger traffic on a profitable basis and the constraints on future growth outlined above, I really cannot see why the Secretary of State for Transport overruled the Planning Inspectorate and approved the DCO. There is significant available capacity to handle additional freight at East Midlands and Stansted (as well as at other airports with the exception of Heathrow and Gatwick) for at least the next 15-20 years. If further capacity for dedicated freighters is needed in the longer-term, then it would be preferable to have a more central location within the UK, either through expansion of an existing airport or possibly by developing an ex-RAF airfield with good road connections and where there would potentially be fewer households exposed to aircraft noise. It simply does not make sense that the SoS can conclude that 'there is a clear case of need for the Development which existing airports (Heathrow, Stansted, EMA and others able to handle freight) would not bring about to the same extent or at all'. My feeling is that the rationale for this conclusion is likely to be challenged in any Judicial Review of the SoS's decision.

The issue of cost was not raised as part of the DCO approval process. The capital cost of the proposed development has been variously reported at £300m, £330m and £400m. This investment, together with the financing and operating costs would need to be recovered through airport and handling charges. It is likely that these charges will be higher than those at other airports where the infrastructure is already in place, even if there are initial discounts to attract air freighter operators.

It should also be noted that the previous owner of the site, Stone Hill Park, proposed that a 'heritage' airport is retained at the site in addition to new housing and a business park. This could comprise the existing heritage museum, which would need to be relocated and facilities for vintage aircraft and general aviation. It is also

possible in the longer-term that the airport might support commercial operations by smaller electric aircraft.

Sale of land

There is little doubt in my mind that RSP's objective in promoting the Manston development is to sell off some or all of the land for housing and/or industrial development. There is a part of the airport site, known as the 'Northern Grass', which has long been muted as a potential area that could be sold off – although RSP claim that it would be used for the airport's development. It is interesting that the Planning Inspectorate took a different view on whether this was needed. It should be noted that approval of the DCO does not prevent RSP selling off some or ultimately all of the land should, for any reason, the airport prove to be unprofitable or the development does not proceed at all. I also wonder as to what are the Terms of Payment for the sale of the site by Stonehill Park Developments to RSP. These have not been made public and, if I were in RSP's shoes, I would not part with £16.5m unless I was certain that the airport scheme had full and final approval and funding was in place for the development. If, for some reason, payment was not forthcoming, I would assume that ownership of the site would revert back to Stonehill Park. Alternatively, if the development were to go ahead and some land was ultimately sold, they may have negotiated a potential stake in the proceeds.

Although Thanet District Council and the local MPs are in favour of the development, there is considerable opposition locally, particularly as the flight paths to the east are over the town of Ramsgate. There is also likely to be an adverse impact to tourism in Ramsgate although the Planning Inspectorate acknowledged that there may be some tourism benefits to the wider East Kent region. There is also some local support for the promised new jobs in an area of high unemployment but this, of course, is entirely dependent on the success of the airport development.

Suitability of the developer

A further issue is the background of RSP and its key personnel. RSP is a US investment company with no background in or experience in airport development or operations. The source of the funding for the project (£330m) is completely undetermined. Many of the project's opponents have questioned RSP's financial resources and it is noteworthy that there were delays in paying the Planning Inspectorate's fees for the DCO application. RSP's key UK director, Tony Freudmann, has had a chequered career. He was reportedly struck off as a Solicitor for the misuse of client funds, before joining Planestation, where he became CEO of its European operations. He has also been involved with other airport developments in Germany, although none of these have proved to be successful. Mr Freudmann is known to be a close associate of two local Tory MPs, Sir Roger Gale and Craig Mackinlay.

Impact on climate change

I recognise that, for some objectors, there is an issue as to whether the project would contribute towards climate change. RSP has indicated that the airport would contribute some 1.9% of the UK's target CO2 emissions for 2050. The Planning Inspectorate determined that this weighed moderately against the development. My

own view, however, is that the UK aviation sector as a whole is fully committed to meeting these targets in line with ICAO requirements and, if the development were not to proceed, any traffic growth would in any case be accommodated at other UK airports.

How would the development be financed?

Should the DCO decision be upheld, then it is unclear as to how the development would be funded. If private finance is not forthcoming, then might RSP seek funds through a public offering ? It is also possible that the RSP may try to sell some land to enable the initial investment, although ultimately the only beneficiary of this will be developer. In addition, given the fragmentation of the UK air freight market, it is conceivable that RSP might at some point attempt to fund its own home-based cargo airline – somewhat reminiscent of Planestation's venture with EUjet and the Stobart Group's investment in Stobart Air to support London Southend Airport. But CargoLogic's difficulties in establishing a viable dedicated cargo airline even when better located UK airports are used would suggest that any venture of this type would be doomed to failure.

False hopes?

As a specialist consultant, I am certainly not anti-aviation and I generally support expansion, subject to meeting the relevant climate change and other environmental constraints. I would hope that some aviation activity can be retained at the site both to maintain its heritage and for light aviation. This might, in the future, include the use of electric aircraft eg for recreational flying and small-scale commercial passenger operations. There is a strong sense of community in the Ramsgate area and passions both for and against the development run high. But the location of any airport is fundamental and the development of a major cargo hub at Manston as proposed is simply not commercially viable. I cannot see any reason for the SoS's decision to approve the DCO application, beyond perhaps creating a false promise of jobs in a deprived area as we move into the expected economic recession.

I personally hope that the decision will now be overturned in a Judicial Review. If not, I suspect it will be a long, drawn-out saga with few, if any, jobs created and no long-lasting benefit to the local community.

**Consultancy advice in relation
to the redetermination of the
Application for a DCO for the
reopening and development of
Manston Airport**



Draft Report

July 2021



Contents

1. Introduction

- 1.1 Background to the assignment
- 1.2 Alan Stratford and Associates Ltd

2. Impact of changes to national and local policies since 9 July 2020

- 2.1 Airports National Policy Statement (ANPS)

3. Impact of changes to the quantitative need for the development since 9 July 2019

- 3.1 Global and national demand for air freight
- 3.2 Cargo ATM and handling capacity at other UK airports
- 3.3 Locational factors
- 3.4 Summary

4. Impact of changes relating to carbon emissions from UK aviation

- 4.1 Impact of development on UK national carbon emissions targets
- 4.2 Sixth Carbon Budget (2033-2037)

5. Other matters arising since 9 July 2019

- 5.1 Impacts related to forecasted employment
- 5.2 Airspace Change Proposal
- 5.3 Lack of support from the air freight and logistics sector
- 5.4 Impact on aircraft noise
- 5.5 Impact on local tourism

6. Conclusions

Appendix A

Department for Transport letter to Interested Parties (11 June 2021)

1. Introduction

1.1 Background to the assignment

On 15 February 2021, the High Court quashed the decision by the Secretary of State for Transport regarding the application for a Development Consent Order (DCO) for the establishment of a cargo hub at the disused Manston Airport in Kent. The Department for Transport is now required to reassess its decision and has written to Interested Parties requesting further representations on certain issues for the purposes of redetermining this decision (see Appendix A).

This report is prepared by the independent aviation consultants, Alan Stratford and Associates Limited (ASA) on behalf of Ramsgate Town Council who, as an Interested Party, are planning to respond to this request. The report provides an analysis of the implications of changes to national aviation policy since 9 July 2020 and the factors that impact on the quantitative need for the proposed development that have arisen since 9 July 2019. As such, the impact of these changes will not have been considered in the evidence provided to the Planning Inspectorate's (PINS) Inquiry which recommended that the DCO should not be approved nor will they have been taken into account in the Secretary of State's decision which overturned the Planning Inspectorate's recommendation.

Wherever possible, we have endeavoured to make an independent evidence-led approach to this assessment. Any views expressed are our own and not those of Ramsgate Town Council or any other party.

1.2 Alan Stratford and Associates Ltd

Alan Stratford and Associates (ASA) is one of the leading and oldest established aviation consultancy practices in the UK. It was established in 1968 to provide a wide range of specialist independent air transport consultancy services, including air traffic forecasting, economic appraisal and operational studies across the airport and airline sectors.

The firm has extensive project experience at both at UK hub and regional airports, including Manston. Previous assignments carried out include advice to Thanet District Council on a Section 106 Agreement at Manston Airport and assistance to Kent County Council in respect of their response to the Airport Commission's consultation on airport capacity in London and the south east. ASA has also worked for the UK Civil Aviation Authority on regulatory studies at London Heathrow Airport and for the Irish Commission for Aviation Regulation on projects at Dublin Airport. The firm is currently working for Sheffield City Region (a partnership of local councils in south Yorkshire) regarding the future of Doncaster Sheffield Airport and on other projects relating to other airports and airfields across the UK .

2. Impact of changes to national and local policies since 9 July 2020

2.1 Airports National Policy Statement (ANPS)

The Airports National Policy Statement (ANPS) provides the policy framework for new runway capacity and infrastructure at airports in the SE of England. After a rigorous assessment by the Airports Commission, a new northwest runway at London Heathrow airport was adopted as the government's preferred option. The ANPS was given parliamentary approval in June 2018 but as at 9 June 2020, was ruled as illegal following a judgement by the Court of Appeal. This ruling was overturned by the Supreme Court in December 2020.

The third runway at Heathrow still requires approval at the Development Consent stage, although given the status of the ANPS, there is no reason to suppose that this should not be granted.

The new runway would provide a significant increase in the availability of slots for both bellyhold cargo on passenger aircraft and for dedicated freighters. Heathrow already accounts for some 62.6% of the UK's air cargo traffic by tonnage handled and 81.1% of that handled by the London area airports¹. The new Heathrow runway would enable it to handle an increased proportion of future longer-term air cargo demand for SE England and the UK as a whole – particularly due to the price differential of passenger bellyhold cargo, which accounts for nearly 70% of all UK air freight.

The increase in ATM capacity at Heathrow would clearly reduce any potential long term demand for a new cargo hub at Manston. It should however be noted that recovery from the impacts of Covid-19 and Brexit is likely to be slow and that growth in UK air traffic is likely be constrained by climate change targets. It is possible therefore that the new runway will be delayed or not built at all. At present, Heathrow Airport Limited (HAL) are targeting that this would open in 2030. In any event, should the third Heathrow runway not be required, this would only arise as a result of lower growth in UK air passenger and cargo traffic than originally forecasted. In these circumstances, we believe that the demand for a new cargo hub at Manston would also be substantially reduced and it would no longer be justified.

3. Impact of changes to the quantitative need for the development since 9 July 2019

3.1 Global and national demand for air freight

The need for a new cargo hub at Manston is dependent on the long-term demand for UK air freight, the availability of air traffic movement (ATM) and cargo handling capacity at other UK airports and the locational advantages/disadvantages of

¹ Based on pre-Covid-19 (2019) figures.

Manston in comparison to these other airports for onward consignment distribution.

There have been significant changes in the nature of the global and UK air freight market since the start of the Covid-19 pandemic which started since the date of completion of the PINS Inquiry (9 July 2019). As indicated in Table 3.1, the overall UK air cargo market in 2020 declined by some 21.0 % on a total tonnage basis which, in turn, represented a decline of some 4.2% over 2018.

Table 3.1 UK Air Cargo Market – 2018-2020

	Total tonnes handled	% change
2018	2,645,710	0.9%
2019	2,535,422	-4.2%
2020	2,002,187	-21.0%

Source: CAA Airport Statistics

The lack of passenger flights and consequently cargo bellyhold capacity during the pandemic has, however, resulted in significant growth in dedicated freighter traffic, although as indicated in Tables 3.2 and 3.3 both the volume of cargo handled by dedicated freighters and the number of dedicated freighter ATMs have begun to decline as passenger flights have started to be reintroduced.

Table 3.2 UK Air Cargo Market by Type – May 2019 – May 2021

Tonnes Handled	May-19	May-20	May-21
Passenger Bellyhold	146,491	17,322	49,231
Dedicated Freightier	65,507	123,090	115,199
Total	211,999	140,412	164,430

Source: CAA Airport Statistics

Table 3.3 UK ATMs by Type – May 2019 – May 2021

Total ATMs	May-19	May-20	May-21
Passenger Aircraft	202,572	10,283	17,000
Dedicated Freightier	4,888	8,263	6,899
Total	207,460	18,546	23,899

Source: CAA Airport Statistics

The figures for dedicated freighters for May 2020 and 2021 include a number of 'pfreighters' (passenger aircraft with the main deck temporarily converted for freight) which are being operated on some routes although some airlines have now started to reconvert these back for predominately passenger use. Other passenger to freight aircraft reconfigurations have (or are) being made on a permanent basis. We do not however believe that this is a reflection of any long-term increase in the growth of global air cargo demand but rather that this is primarily an opportunity for airlines to retire old passenger aircraft types to replace even older, fuel and carbon emission inefficient freighter aircraft.

In terms of longer-term demand, Boeing's latest 20-year air cargo forecast² published since July 9 2019 (October 2020) shows a reduction in the rate of growth of global air freight to 4.0% pa in comparison with their 2018 forecast of 4.2% pa. European

² <https://www.boeing.com/commercial/market/cargo-forecast/>

markets are expected to have a lower rate of growth. This would imply that the Azimuth and Northpoint forecasts for Manston presented at the PINS Inquiry would need to be reduced accordingly. In any event, PINS took the view that.. *'the levels of freight that the Proposed Development could expect to handle are modest and could be catered for at existing airports (Heathrow, Stansted, EMA, and others if the demand existed)'*. We would concur with this view.

The Department for Transport (DfT) has not updated its air cargo forecasts since 9 July 2019. The fundamental driver of air cargo demand in the DfT's forecasting model is UK Gross Domestic Product (GDP), which in turn impacts on the level of imports and exports. As a result of Covid-19, Brexit and other economic factors, government forecasts of UK GDP growth have been significantly reduced since 9 July 2019. The latest forecasts prepared by the Office for Budget Responsibility (OBR)³ predict that UK GDP will return to pre-Covid-19 levels by the second quarter of 2022 although the future level of growth thereafter was highly uncertain. A number of recent studies however, confirm earlier forecasts that the effect of Brexit will reduce the level of UK GDP by about 4% compared with remaining inside the EU⁴. It should be noted that the Azimuth and Northpoint forecasts for air cargo demand at Manston have not taken account of GDP decline due to Covid-19 and it is also unclear as to how or whether the full effect of Brexit has also been incorporated in their forecasts.

3.3 Cargo ATM and handling capacity at other UK airports

We do not believe that the level of air cargo (or passenger) demand at Manston would be sufficient to make it commercially or financially viable and we agree with the PINS Inspector that *'..general air freight would continue to be well served in the UK with spare capacity at Stansted in the short term (to 2030) and the proposed Northwest Runway at Heathrow in the longer term'*.

We should however, point out that, as a result of the Public Inquiry for the expansion of Stansted Airport to up to 43m passengers pa, the maximum number of permitted CATMs (Cargo Air Transport Movements) has been reduced from 20,500 CATMs to 16,000 CATMs to enable an increased number of PATMs (Passenger Air Transport Movements). However, in 2019, Stansted handled only a total of 10,627 CATMs, indicating that there is still considerable excess capacity. Forecasts produced by Stansted Airport Limited (STAL) at the Public Inquiry suggested that air cargo handled at the airport would grow from 209,000 tonnes in 2016 to 376,000 tonnes by 2020. The majority of this, however, would be passenger bellyhold cargo which was expected to grow from 6,000 tonnes in 2016 to 366,000 tonnes in 2028 because of carrier diversification (ie more full-service airlines) and increased long-haul operations. Dedicated CATMs were forecast to grow to just over 16,000 by 2028.

³ <https://obr.uk/overview-of-the-march-2021-economic-and-fiscal-outlook/>

⁴ <https://www.ft.com/content/fbb70741-34cc-4f54-a66b-a2e4b9445f5b>

There is substantial available capacity at East Midlands Airport, which is the UK's second largest cargo airport, handling some 13.2% of total UK air freight in tonnage terms in 2019. There is also considerable scope for other UK airports to handle increased volumes of air cargo both as passenger bellyhold and dedicated freighter traffic. Manchester, Birmingham and Doncaster Sheffield airports, which all have some available night-time capacity, have all placed increased marketing emphasis on attracting air freight since 9 July 2019. In the longer-term, we believe that the price differential between passenger bellyhold and dedicated freighter cargo will widen in the future, particularly in the UK where Heathrow is dominant. Passenger bellyhold cargo is generally carried on more fuel efficient aircraft with fewer carbon emissions on a 'per tonne carried' basis. Given the likely price constraints required to meet the UK's carbon emissions targets and the need to maximise their overall revenues, it is likely that many shippers will favour passenger bellyhold over dedicated freighter cargo in the future.

3.4 Locational factors

Whilst Manston's location (and that of other UK airports) has obviously not changed since 9 July 2019, there are a number of other geospatial factors that have emerged since this date. It is important to stress that other UK airports are better located than Manston for the distribution of air cargo or e-commerce items throughout the UK often via a 'fulfillment centre'. A key location for UK retail and other logistics warehousing is in the 'Golden Triangle', an area that extends between Northampton, Birmingham and Leicester. It includes the prime logistics parks dotted along the M1 from J15 up to J24 and along the M6 in Birmingham. The Golden Triangle area is most easily accessed via East Midlands Airport, although other airports such as Birmingham and Doncaster Sheffield are in relatively easy reach⁵. The importance of this region in terms for logistics warehousing and 'fulfilment' centres is due to its central location. Approximately 85% of the UK's population (or retail stores) can be reached within four and a half hour's drive time by an HGV. This is critical as it is the limit HGV drivers can drive before having to take a break (they are allowed a maximum of nine hours' driving per day). Similar logistics parks are also starting to emerge along the M40 and M6 corridors.

A number of new warehouse logistics parks to support e-commerce, such as the Prologis' Dirft facility on the M1 near Northampton⁶ and GLP's 1.0 million sq ft of speculative warehousing in the East Midlands (the largest programme in the UK)⁷, have been announced since 9 July 2019 - although, with the exception of Amazon's proposed new logistics park near Dartford, none of these are close to Manston Airport. Furthermore, in the March 2021 budget, the government announced eight new freeport sites across the UK, including the East Midlands (which incorporates East Midlands

⁵ <https://www.shdlogistics.com/news/cbre-demystifies-golden-triangle-debate>

⁶ <https://www.bbc.co.uk/news/business-57547389>

⁷ <https://www.shdlogistics.com/property/e-commerce-fuels-speculative-warehousing-golden-triangle>

Airport). All of these freeport locations are, however, more easily accessed via other UK airports rather than via Manston.

As indicated in the PINS report, the express freight integrators and e-commerce suppliers prefer to be based at a centrally-located cargo hub such as East Midlands or Stansted. Amazon Air has an established base at East Midlands Airport but has, since 9 July 2019, introduced night flights via Southend Airport. We see no possible future opportunities for Amazon Air or any other e-commerce or express freight operators to be based at Manston, particularly in view of the Applicant's commitment not to operate any night flights.

The importance of an airport's location is fundamental for both passenger and freight traffic. In the case of freight, single consignments, say fresh fruit from Africa, will need to be distributed to retail stores across the UK as quickly as possible. Similarly e-commerce delivery times are becoming increasingly shorter. Manston's remote location puts it at a considerable disadvantage over other UK airports. We believe that there is (or will be) sufficient capacity at Heathrow, Stansted and East Midlands Airports to handle UK air cargo growth for at least the next 20 years, but even if this proved not to be the case, other UK airports would be more suitable for this. We agree therefore with PINS' view that...*'If demand were present, then facilities could be constructed at other airports where speed and handling efficient could be largely matched to the Applicant's plan and the ExA (Examining Authority) is not convinced that the location of the Proposed Development is entirely favourable'*.

3.5 Summary

The PINS Inspector's report concluded that.. *'the levels of freight that the Proposed Development could expect to handle are modest and could be catered for at existing airports (Heathrow, Stansted, EMA, and others if the demand existed)'*. In view of this, it considered that ..*'Manston appears to offer no obvious advantages to outweigh the strong competition that such airports offer'*.

The changes to the UK air freight market and its likely development over the next 20 years as discussed above reinforces PINS' overall conclusions.

4. Impact of changes relating to carbon emissions from UK aviation

4.1 Impact of development on UK national carbon emissions targets

The PINS Inquiry reviewed the likely impact of the Manston development on climate changes in view of the relevant national and local policies at the time. These included the Airports National Policy Statement (ANPS), the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG), the Infrastructure Planning (EIA) Regulation 2017, the Climate Change Act 2008 and the Emerging Draft Thanet

Local Plan to 2031 policies.

The PINS Inspector's report concluded that '*...climate change issues have been adequately assessed, and that the requirements of the ANPS, NPPF and 2017 EIA Regulations are met*'. However, it also noted that.. '*given the direction of emerging policy that the Proposed Development's contribution of 730.1 KtCO₂ per annum ie 1.9% of the total UK aviation carbon target of 37.5 Mt CO₂ for 2050, from aviation emissions will have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets. As a result, the report '..concludes that this weighs against the granting of development consent*'.

The Climate Change Act 2008 did not require international aviation (which would form the vast majority of Manston's flights) to be included in the UK government's targets for Net Zero emissions. However, the Sixth Carbon Budget, which was published on 9 December 2020, set a new goal to reduce carbon emissions by 78% by 2035 in comparison to 1990 levels and it incorporates the UK's share of emissions from international aviation as from 2033.

The Sixth Carbon Budget was enshrined in UK legislation on 22 June 2021 and will present substantial challenges for its aviation sector, with some estimates suggesting that a traffic increase of only 25% between 2018 and 2050 would be possible in order to meet the 'Net Zero' target⁸. Further targets may be required to curb the climate change effects of non-CO₂ emissions from aviation in the future.

There is no doubt that in order to meet the Net Zero requirements, the growth of both UK air passenger and cargo traffic will need to be substantially curtailed in the future, probably largely through price increases. This will significantly reduce the level of possible future air cargo (and passenger) demand at Manston. Furthermore, it should be noted that Manston's potential 1.9% share of the UK's aviation carbon target by 2050 is implicitly already allocated to other airports, many of which have existing planning consent for such growth. In these circumstances, DCO consent for the new Manston development must be regarded as unjustified.

5. Other matters arising since 9 July 2019

5.1 Impacts related to forecasted employment

The PINS report concluded the level of new employment from the new Manston development forecasted by the Applicant was flawed, with an incorrect use of employment multipliers and no adjustment for displacement effects. The report indicated that the jobs generated as forecasted by the Applicant were more likely to be at the national level rather than benefit those living in Thanet or East Kent.

⁸ <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Aviation.pdf>

We agree with the PINS Inspector's view. In particular we note that the jobs generated would only arise if the forecasted level of cargo (and passenger) demand is achieved and that historically direct employment at Manston has never exceeded more than 200 jobs.

It should also be pointed out that since 9 July 2019, the Applicant has reportedly indicated that the level of jobs generated by the development is likely to be lower than expected due to automation although it is not clear as to the possible scale of this reduction.

5.2 Airspace Change Proposal

As part of its plans for the site, in 2019 the Applicant began the process to secure approval from the Civil Aviation Authority (CAA) for its use of airspace and procedures for safe and efficient operations to and from the airport, if Manston opens again. There are seven stages and 14 steps that need to be completed for the airspace change to be approved by the CAA. As well as this, there are four 'gateways' which must be approved.

We understand that, at 9 July 2021, the Applicant had not yet met the necessary requirements for approval of the 'Develop and Assess Gateway', (part of Stage 2) due to 'errors and inconsistencies'. Whilst this does not preclude the eventual resolution of these requirements should DCO consent be granted, a full public consultation will be required, which presents a question mark over the feasibility of the necessary airspace changes.

5.3 Lack of support from the air freight and logistics sector

We note that there has been a conspicuous lack of publicised support for the proposed development from cargo (or passenger) airlines, air freight integrators and other logistics specialists since 9 July 2019 (including the period from 15 February 2021 when it was announced that DfT's decision was to be re-assessed). It is possible that private submissions will be made to DfT, although we would contend that if such support existed, this would probably already have been publicised by the Applicant himself. It should be noted that the traffic forecasts prepared by Azimuth Associates on behalf of the Applicant and presented at the Public Inquiry were based on interviews with airlines and logistics specialists, although the identity of the interviewees and the outcome of the interviews were not disclosed.

5.4 Impact on aircraft noise

The extent of aircraft noise generated by the development and its construction was the subject of considerable debate during the PINS Inquiry. The Inspector's report indicated that the mitigation package (R9b) proposed by the Applicant would, in his

view, address the noise impacts adequately. Nevertheless this does not alter the fact that a considerable number of people, particularly those living in Ramsgate, would be affected by the adverse effects of aircraft noise if DCO consent were granted and the forecasted traffic levels achieved. In practice, we believe that the changes to the expected traffic demand at Manston as outlined above would reduce these noise impacts although they would nevertheless be significant and properties would continue to be blighted.

5.5 Impact on local tourism

During the PINS Inquiry, the impact of the proposed development on the local tourism industry was discussed. In his report, the PINS Inspector indicated that he was *'persuaded by the view of TDC that while the Proposed Development may bring further tourists to the wider area, the amenity impacts from the construction and operation of the Proposed Development would adversely affect the tourism industry in Ramsgate'*.

Whilst we agree with the Inspector's position on this, we believe that neither the cargo or passenger traffic levels forecasted by the Applicant are likely to be achieved, particularly in view of the recent changes to the key drivers of traffic demand as described above. Despite this, we still maintain that aircraft noise levels would still be sufficient to have a serious detrimental impact on local tourism, particularly in Ramsgate where visitors to the town centre, beaches and other local attractors would be under the direct flight path of a cargo airport.

6. Conclusions

To summarise our conclusions:

- (i) Heathrow is likely to continue to be the UK's main gateway for air cargo, along with Stansted and East Midlands Airports.
- (ii) The Airports National Policy Statement (ANPS), in which a new north-west runway at Heathrow is adopted as the preferred option for additional runway capacity in the south east now has full legal status following an over-ruling by the Supreme Court. This would provide substantial additional passenger bellyhold and dedicated freighter capacity and would significantly reduce the need for a new facility at Manston. Whilst it is possible that the third Heathrow runway is no longer required due to lower levels of future air traffic growth, this would also apply to Manston.
- (iii) The impacts of Covid-19 have increased the number of dedicated freighter ATMs across the UK. These impacts are expected to be temporary until bellyhold capacity becomes available following the resumption of passenger flights. In the longer-term, the price differential of bellyhold

capacity over dedicated freighters is likely to widen as freighter aircraft are likely to have cost penalties due to their higher fuel and carbon emissions.

- (iv) Following a Public Inquiry for the expansion of Stansted held earlier this year, the airport agreed to reduce its number of permitted Cargo Air Transport Movements (CATMs) to 16,000 pa. This, however, is considerably in excess of its pre-Covid level of 10,627 in 2019. As such, there is considerable scope for expansion, if required, thereby reducing the need for a new facility at Manston. There is also substantial spare cargo capacity, including for night-time operations, at East Midlands, Birmingham, Manchester and Doncaster Sheffield Airports.
- (v) In the medium to long term, the impacts of Covid-19 and Brexit are likely to have a significant impact on UK GDP growth and its consequent effect on air freight (and passenger) demand. This will, in itself, reduce the quantitative need for the proposed development at Manston.
- (vi) A number of new logistics parks and fulfillment centres for e-commerce have been announced since 9 July 2019, most of which are in the 'Golden Triangle' in the East Midlands or in the M40 or M6 corridors, which are centrally located for onward distribution across the UK. Other airports, including East Midlands, Stansted, Birmingham and Doncaster Sheffield, are better placed than Manston to serve these logistics parks and fulfillment centres.
- (vii) The Sixth Carbon Budget, which required UK international aviation to be included in its Net Zero targets from 2033 onwards, was enshrined in UK legislation on 22 June 2021. As a result, UK air passenger and cargo traffic will need to be substantially curtailed in the future, probably largely through price increases. This will significantly reduce the level of possible future air cargo (and passenger) demand at Manston. Furthermore, it should be noted that Manston's potential 1.9% share of the UK's aviation carbon target by 2050 is implicitly already allocated to other airports, many of which have existing planning consent for such growth. In these circumstances, DCO consent for the new Manston development, must be regarded as unjustified.
- (viii) The lack of any publicised support from cargo (or passenger) airlines, air freight integrators or the logistics industry, even after 15 February 2021 when it was announced that DfT's decision was to be re-assessed, suggests that there is little appetite for the proposed development.
- (ix) Whilst the impact of any lower traffic demand at Manston as a result of these changes would reduce the impact of aircraft noise for the local

community, there would still be significant adverse noise effects particularly for those living in Ramsgate.

- (x) The expected reduced level of traffic demand will impact on the forecasted extent of employment created by the development if consent for the DCO were to be granted. The number of local tourists would similarly be expected to reduce, although the construction and operation of the new facility would still have an adverse impact on the local tourism industry, particularly in Ramsgate.
- (xi) In summary, the changes since 9 July 2021 significantly reduce the quantitative need for the proposed development, whilst substantial adverse impacts, such as its effect on climate change, aircraft noise and the local tourism industry still remain. The PINS Inspector recommended that consent for the DCO should not be granted. We would concur with this view.

Appendix A

Department for Transport letter to Interested Parties
(11 June 2021)



Department for Transport

Great Minster House
33 Horseferry Road
London, SW1P 4DR

Telephone:
e-mail: transportinfrastructure@dft.gov.uk
Web: www.gov.uk/dft

To:

All Interested Parties

11 June 2021

cc:

Dear Sir/Madam

Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010

Re-determination of the Application by RiverOak Strategic Partners Limited (“the Applicant”) for an Order granting Development Consent for the reopening and development of Manston Airport in Kent.

STATEMENT OF MATTERS

1. The High Court’s order dated 15 February 2021 quashed the decision of the Secretary of State for Transport dated 9 July 2020 to grant the application by RiverOak Strategic Partners Limited (“the Applicant”) for development consent for the proposed development and reopening of Manston Airport in Thanet, Kent (“the Development”). Following that order, the Secretary of State must now re-determine that application.
2. I am therefore writing in accordance with rule 20(2) of the Infrastructure Planning (Examination Procedure) Rules 2010 to set out to you, as an Interested Party to the above application, the following matters which the Secretary of State invites further representations for the purposes of his re-determination of the application. These matters are:
 - the extent to which current national or local policies (including any changes since 9 July 2020 such as, but not limited to, the re-instatement of the ANPS) inform the level of need for the services that the Development would provide and the benefits that would be achieved from the Development;
 - whether the quantitative need for the Development has been affected by any changes since 9 July 2019, and if so, a description of any such changes and the impacts on the level of need from those changes (such as, but not limited to, changes in demand for air freight, changes of capacity at other airports, locational requirements for air freight and the effects of Brexit and/or Covid);

- the extent to which the Secretary of State should, in his re-determination of the application, have regard to the sixth carbon budget (covering the years between 2033 – 2037) which will include emissions from international aviation; and
 - any other matters arising since 9 July 2019 which Interested Parties consider are material for the Secretary of State to take into account in his re-determination of the application.
3. In addition to the above matters set out in paragraph 2, the Secretary of State requests information from the Interested Parties specified below.
 4. In light of the passage of time since close of the examination, the Secretary of State requests the **Applicant** to consider the currency of the environmental information produced for the application (including information submitted to inform the Habitats Regulation Assessment) and either confirm the continued currency of that information, or where necessary, to submit updated information.
 5. The Secretary of State seeks confirmation or otherwise from **the Government Legal Department** of consent to the compulsory acquisition under section 135 of the Planning Act 2008 in relation to plots 019c and 05b held as Queen's Nominee in respect of bona vacantia land.
 6. The Secretary of State seeks confirmation or otherwise from both **the Met Office** and **the Secretary of State for Housing, Communities and Local Government** of consent to the compulsory acquisition under section 135 of the Planning Act 2008 in relation to plot 27.
 7. **The deadline for any response is 9 July 2021.**
 8. Responses to the matters outlined in this statement of matters should where possible be provided by email to manstonairport@planninginspectorate.gov.uk, marked "For the attention of the Manston Airport Case Team". As a result of ongoing Government guidance relating to the coronavirus (COVID-19) emergency, the Planning Inspectorate based at Temple Quay House is unable to receive postal submissions in a reliable way. Postal submissions made to the Secretary of State for Transport, Manston Airport Case Team, c/o Planning Inspectorate, National Infrastructure Planning, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN will therefore be subject to delay and we cannot guarantee that they will be received in time to be considered. If you have difficulty in submitting a response by the consultation deadline, or difficulty in submitting a response by email, please inform the Manston Airport Case Team.
 9. The Secretary of State has appointed an independent aviation assessor to advise him on matters relating to the need for the Development and to produce a report summarising those findings. The assessor's report, along with all representations received and any supporting information, will be made available on the Planning Inspectorate's National Infrastructure Planning website as soon as possible after the 9 July 2021 deadline for responses at:

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/>
 10. An opportunity to comment on the independent aviation assessor's report, the representations received and any supporting information will be given to Interested Parties. The Secretary of State will then consider the responses and information received in redetermining the application.

11. All previous representations and information relating to the application received before 9 July 2020 has been published on the National Infrastructure Planning website. To assist the Secretary of State, any reliance on information containing in previous representations made either during or since the examination should also include the relevant document reference number(s) and preferably also include hyperlinks to where the documents can be viewed on the National Infrastructure Planning website.
12. Any correspondence received between 9 July 2020 and the date of this statement of matters has not been published on the National Infrastructure Planning website and as such will not be taken into account as part of the re-determination process. Where Interested Parties have submitted comments on the application between 9 July 2020 and the date of this statement of matters, and where they wish to have those comments treated as a formal representation in the re-determination process, the Secretary of State requests that Interested Parties resubmit their correspondence. The Secretary of State will then treat such resubmitted correspondence as a formal representation submitted to him in response to his statement of matters.
13. This letter is without prejudice to the Secretary of State's re-determination of the application for the Manston Airport application and his decision whether or not to grant development consent for the reopening and development of Manston Airport, and nothing in this letter is to be taken to imply what that decision might be.

Yours faithfully

Natasha Kopala
Head of Transport Infrastructure Planning Unit



**Elfin House
1A Elfin Grove
Teddington
Middlesex TW11 8RD**

**Tel: 020 8977 2300
Email: info@alanstratford.co.uk
Web: www.alanstratford.co.uk**

