

Re-determination of the Manston DCO

I refer to your email of 11 June 2021 and am responding as an interested party.

In your email you have asked for a number of issues to be addressed; broadly, the level of need for the development, the effect on climate change and then any other issues.

Before addressing these items specifically I think it is essential to understand the broad history of this application and the conclusions and recommendations of the examiners who spent many months hearing detailed evidence from the applicant and the many interested parties and experts on both sides. I therefore hope you will access and read all of the representations I and others have made. I consider that all the points and concerns I raised throughout the process to date, including the examination, are as equally valid and relevant today as at the time of their original submission. Please see below (at the end of this document), a table of links to my historic submissions on the subject.

If we were to assume that nothing had changed since the examiners concluded on this application then we must look at the conclusions they arrived at and the decision they made to refuse the DCO. We can then look at what has changed and whether on the basis of those changes the examiners would conclude differently. In summary their conclusions were:

Clause 8.2.24 The ExA concludes 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). The ExA considers that Manston appears to offer no obvious advantages to outweigh the strong competition that such airports offer. ***What's changed – a number of other airports have been granted expansion making this point even more relevant, more detail below. Expansion at Heathrow is now even more likely (it always was) to occur, given recent court rulings.***

Clause 8.2.25 The ExA, therefore, concludes that the Applicant has failed to demonstrate sufficient need for the Proposed Development, additional to (or different from) the need which is met by the provision of existing airports. ***What's changed – see comments above.***

Clause 8.2.74 the Proposed Development will have a material impact on the ability of Government to meet its carbon reduction targets. ***What's changed – we now have the 6th carbon budget which requires government to include aviation emissions in their calculations.***

Clause 8.2.177 Direct jobs at the airport would be 19% lower than forecast. ***What's changed - RSP have, since the examination ended, acknowledged publically that the job numbers they provided would be reduced due to automation. They have also said that the skilled ATC jobs would be done remotely and not at the airport or in Thanet.***

Clause 8.2.180 The ExA has significant doubts over the calculation of direct, indirect/induced, and catalytic job numbers. ***What's changed – see comments above.***

Clause 8.2.143 The proposed interference with the Human Rights of individuals is not justified. ***What's changed – post-COVID this is even more relevant – please see comments***

on education below. It must also be stressed that the applicant's assessment of noise and impact were grossly understated. Noise contours derived independently by the CAA showed significantly more properties affected than the contours derived by RSP. There were many representations from Ramsgate residents who the examiners acknowledged would be very adversely affected, however this one, from a teacher Paul Luxmore, is particularly relevant:

"I am the Executive Headteacher of Coastal Academies Trust, consisting of five schools in Thanet: Dane Court Grammar School, King Ethelbert School, Hartsdown Academy, Cliftonville Primary School and Royal Harbour Academy. The Trust educates 4,500 children and employs iro 500 staff. I wish to register two serious objections to the proposals:

- 1. That up to 17,000 flights per year will seriously disrupt the education of children during the daytime - as is recognised in the planning submission.*
- 2. That night flights will have a disastrous effect on the education of children living under, or near, the flight path.*

I used to live under the flight path in Ramsgate - on Royal Road - and so I know from personal experience that every plane landing at night wakes up those under it. Whilst occasional daytime flights were tolerable - 17,000 will not be. []*

Thanet schools already under perform against national expectations, owing to the challenging socio economic background of the children. Disturbed sleep at night will make our job of educating them much harder than it already is. Significant noise disturbance during the day will also seriously disrupt learning. In my professional judgement, the proposal would significantly damage the life chances of thousands of children in Thanet - and this would be unacceptable by any rational standard."

** Note: the quoted number of ATMs here at 17,000 only refers to cargo flights whereas the total projected number of ATMs is 65,000.*

More recently, the COVID pandemic has had a devastating impact on the schooling of a generation of children – particularly those from under-privileged backgrounds. Ofsted's latest (December 2020) report stated:

"Inspectors heard that repeated absences due to COVID-19 outbreaks have resulted in pupils losing more learning. Many children are thought to be at least 6 months behind where they should be. And for a significant number of pupils, repeated periods of self-isolation have chipped away at the progress they have been able to make since September."

Creating additional challenges for these children by subjecting them to significantly disturbed sleep, in addition to daytime noise disrupting lessons, will engrain this educational shortfall for a lifetime.

Clause 8.2.184 The Proposed Development would adversely affect the tourism industry in Ramsgate. *What's changed – due to COVID and the inability of people to vacation abroad,*

the demand for UK holiday destinations has increased substantially with great economic benefit to seaside locations, such as Ramsgate, in particular. Whilst international travel may well return in due course it is very likely that, now rediscovered, our UK seaside towns will continue to benefit in the future. Ramsgate has been awarded regeneration monies and a grant from the levelling up fund is still to be decided; there are huge plans for the town focussed on maritime and tourism which will be undermined by the proposed development. The damage to the tourist industry in Ramsgate will therefore be more than the examiners concluded at the time.

These were clear and sufficient reasons for the examiners to conclude that the DCO should be refused and it was very surprising that after such a long and detailed examination with this clear conclusion that the SoS sought to ignore and overrule the examiners' recommendation as he did (although this was subsequently quashed). Given the changes highlighted above are all more negative for the airport, any re-determined decision should also be a refusal to permit the DCO.

Replying directly to the questions as laid out in your letter:

1. The need case

The examiners focussed on this point extensively during the examination as it is a key determinant as to whether a DCO should be approved. York Aviation provided clear evidence on this point as did many other interested parties. This led the examiners to conclude that need was not proven.

We should not forget that the Airports Commission when choosing its preferred airports for expansion considered but did not include Manston as an option. This from their report - 2.23 *"The Airports Commission consulted widely on its appraisal framework, which contained its criteria for sifting proposed schemes, and the Government is satisfied that the appraisal framework was appropriate. The Airports Commission received 52 proposals, with three options developed by the Airports Commission itself. The Airports Commission took advice from a number of relevant stakeholders, including NATS Holdings, the Civil Aviation Authority, Network Rail, and the Highways Agency (as it then was). The Government believes that the Airports Commission has analysed all the options put forward to the appropriate degree of detail, and discounted non-shortlisted schemes fairly and objectively according to the sift criteria. The Government does not consider that any of the non-shortlisted schemes represents a reasonable alternative to its preferred scheme."*

Given the expansion we have seen at other airports since the examination concluded, the likelihood of Heathrow being expanded and the fact that for some considerable time existing airports will have excess capacity due to passenger travel constraints, this weakens the need case further. If we look specifically at freight capacity, which has fallen, any increase could quite easily be accommodated at existing airports – noting in particular that British Airways has relinquished its slots at Gatwick creating immediate additional capacity.

2. Climate change

We are seeing the impact of climate change more and more each day, with issues in Canada most recently. It is therefore essential that we take this seriously and it is encouraging that the UK government has adopted the recommendations of the CCC and the 6th Carbon Budget.

Clearly we saw the examiners conclude that the RSP Proposed Development will have a material impact on the ability of Government to meet its carbon reduction targets - however this was a conclusion based on the carbon impact of the airport itself and did not include the carbon impact of the aviation that the airport will promote and facilitate. If we were to include the carbon impact of the 65,000 ATMS that RSP have requested this would make the carbon impact significantly higher.

The Applicant's assessment of its carbon emissions are again quite suspect. The Applicant has repeatedly said it will only engage with freight operators who own and operate new, cleaner and less noisy planes. However during recent CAA focus group meetings the Applicant has engaged with a cargo airline, Magma Aviation, whose fleet has an average age of 25.8 years. There has been no viability assessment undertaken for this project and it is completely speculative given the long history of failure of this airport. Therefore, allocating aviation emissions to this venture to the detriment of other historically successful airports like Heathrow, Gatwick and Stansted seems unnecessary. Given the demand from the public in the UK and globally for governments to take immediate constructive action regarding climate change, opening a new aviation freight hub in the UK with poor transport links seems counter-intuitive.

Charlie Wilson, a reader in energy and climate change at the University of East Anglia, said at the Science Media Centre in London recently "we desperately need consistent, concerted direction toward net zero." Building new airport capacity is clearly inconsistent with that.

Lorraine Whitmarsh, Director of The UK Centre for Climate Change and Social Transformations said, at the same venue, "By providing that capacity, you're going to make flying more attractive and easier, and we want to be doing the opposite".

Thanet District Council itself has, on 11th July 2019, declared a climate emergency and committed to "Do what is within our powers and resources to make Thanet District Council carbon neutral by 2030, taking into account both production and consumption emissions". Development of additional, unnecessary airport capacity is directly at odds with this goal.

The CCC concluded that "The Balanced Net Zero Pathway does allow for some limited growth in aviation demand over the period to 2050, but considerably less than a 'business as usual' baseline. We allow for a 25% in growth by 2050 compared to 2018 levels, whereas the baseline reflects unconstrained growth of around 65% over the same period. We assume that, unlike in the baseline, this occurs **without any net increase in UK airport capacity**, so that **any expansion is balanced by reductions in capacity elsewhere in the UK.**". Given the Airport Commission and the Aviation NPS both support the expansion at Heathrow, and I

expect if further were required it would be at Gatwick, it must lead to the conclusion that there is no scope for allowing an airport at Manston with no resulting carbon impact.

3. Other Issues

There was much debate about night flights during the examination and despite RSP statements that they did not require, and would not permit, night flights the examiners concluded that there would in fact be flights at night as the applicant had specified a quota count for flights during the night period and had stated in their application that there would be on average 7 late arriving flights each and every night. It is clear that RSP intends to utilise night flights in their operation and this is not surprising given it is required at other freight operations in the UK. In addition, York Aviation concluded in a report for Infratril, a previous owner of Manston, that "Importantly, the Airport has identified that the night noise policy needs to be put in place at this time as attracting additional regular air freight services, some of which will need to operate at night, is **critical** to improving the financial viability of the Airport". The impact of the development on the residents of Ramsgate and Herne Bay has been significantly underestimated as night flights have not been included in any of the assessments undertaken by the applicant and on this basis their application is misleading and seriously flawed.

Noise is another big issue with this project as planes will come in to land very low over the town of Ramsgate with a population of 40,000 people including 10,000 children at 31 schools. In a recent letter to Feryal Clark MP, Robert Courts stated "The Government's policy is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise. We are fully supportive of the need to protect communities from the adverse effects of aircraft noise and realise the importance of noise issues to local communities." I hope he will be giving the residents of Ramsgate the protection he describes.

The focus on air pollution has gathered pace with the acceptance by the courts that it caused the death of a young child. You will have seen representations from Michael Child and others regarding the assertion that the applicant has not considered the ultra-fine particles that are a consequence of planes taking off and landing, a key issue for Ramsgate where planes will be around 500ft above 5 storey Georgian houses. I attach a recent letter from MP Richard Burgon raising concerns about expansion at Leeds Bradford airport, in particular regarding ultra-fine particles. Manston airport is much closer to residential areas than Leeds Bradford so these issues are even more serious for Ramsgate.

One other change that I believe has happened since the examination relates to the corporate structure of RSP. I have addressed this issue in earlier representations and questioned whether it is right that the UK government uses its statutory powers to award a DCO to a company whose ultimate owners reside behind a veil of secrecy in an offshore jurisdiction and who on that basis will never pay UK tax. The initial ownership of RSP was based in Belize, it then changed to The British Virgin Islands and more recently to Panama. I attach separately a company structure diagram.

Finally, during the examination there was debate as to who should have to pay for road infrastructure changes and enhancements, should it be Kent County Council or the applicant RSP. A decision, unfairly in my opinion, was made that these considerable costs should be borne by KCC. However following the COVID pandemic and the increased costs this will have brought to KCC perhaps during your re-determination you can consider this issue again and reallocate these costs to RSP who are the party that will have caused these expenses and who will benefit from the infrastructure, whilst of course remaining a non UK tax payer (as above).

I fully support the original conclusion of the Planning Inspectorate that this application should be declined. The passing of time and the events of the past year have only added weight to the arguments against development of the Manston site into an airport, making the case for refusal of the application even stronger.

Yours sincerely

Adem Mehmet

Encs:

1. Letter from Richard Burgon
2. RSP Corporate Structure diagram

Previous Submissions with reference numbers from the Examination Library (as relevant)

AS-064	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003924-AS%20Adem%20Mehmet%201%20Final.pdf
AS-078	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003936-AS Adem%20Mehmet.pdf
AS-082	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004012-AS Adem%20Mehmet%202.pdf
AS-157	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004374-AS%20-%20Adem%20Mehmet%20-%20Manston%20DCO.pdf
AS-234	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004592-AS%20-%20Adem%20Mehmet%20-%20Noise-Insultation-Policy.pdf
AS-235	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004593-AS%20Adem%20Mehmet%20Re %20Manston%20Airport%20-%20Noise-Insultation-Policy_Redacted.pdf

AS-236	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-004641-AS%20-%20Adem%20Mehmet%201%20Manston%20DCO_Redacted%20FINAL.pdf
REP1-061	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-002927-Adem%20Mehmet%20-%20under%20s69.pdf
REP2-005	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-002967-Adem%20Mehmet%20-%20Comments%20on%20Deadline%201%20Submissions.pdf
REP3-264	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003321-Adem%20Mehmet%20-%20Written%20Representation.pdf
REP4-070	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003593-Adem%20Mehmet%20-%20Comments%20on%20Local%20Impact%20Reports%20-%20Thanet%20District%20Council.pdf
REP4-071	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003594-Adem%20Mehmet%20-%20Comments%20on%20WR.pdf
REP4-072	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003592-Adem%20Mehmet%20-%20Comments%20on%20Local%20Impact%20Reports.pdf
REP4-073	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003591-Adem%20Mehmet%20-%20Comments%20on%20Responses%20to%20ExA%20WQ's.pdf
REP4-100	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003680-Adem%20Mehmet%20-%20Late%20Submission.pdf
REP5-034	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003807-Adem%20Mehmet%20-%20Deadline%205%20Sub%202.pdf
REP5-035	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003807-Adem%20Mehmet%20-%20Deadline%205%20Sub%202.pdf
REP5-036	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003808-Adem%20Mehmet%20-%20Deadline%205%20Sub.pdf
REP5-037	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003809-Adem%20Mehmet%20-%20Response%20to%20D4%20submission.pdf
REP5-038	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003810-Adem%20Mehmet%20-%20Response%20to%20Funding.pdf
REP5-039	https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003811-Adem%20Mehmet%20-%20Response%20to%20Night%20Flights.pdf
REP6-060	https://infrastructure.planninginspectorate.gov.uk/wp-

	content/ipc/uploads/projects/TR020002/TR020002-004010-Adem%20Mehmet%20-%20Deadline%206%20Submission.pdf
REP8-037	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004294-Adem%20Mehmet%20-%20Manston%20Airport%20DCO.pdf
REP8-038	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004237-Adem%20Mehmet%20-%20Manston%20Airport%20DCO.pdf
REP8-039	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004269-Adem%20Mehmet%20-%20Manston%20Airport%20DCO%20-%20RSP%20Accounts.pdf
REP9-029	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004454-Adem%20Mehmet%20-%20Manston%20DCO.pdf
REP9-030	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004484-Adem%20Mehmet%20-%20DCO%20Submission%2028%20June%202019.pdf
REP11-020	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004651-Adem%20Mehmet%20-%20Manston%20DCO%20-%20SHP%20sale%20to%20RSP.pdf
Response to the Secretary of State's Consultation of 17 January 2020	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005227-Adem%20Mehmet%20DCO%20Submission%20January%202020.pdf



Richard Burgon MP
Member of Parliament for East Leeds



Rt Hon Robert Jenrick MP
Secretary of State for Housing, Communities and Local Government.
Ministry of Housing, Communities and Local Government
2 Marsham Street
London
SW1P 4DF

12th March 2021

Dear Secretary of State,

I am contacting you on behalf of many of my constituents who have raised concerns about the proposed expansion of Leeds Bradford Airport (planning application 20/02559/FU). This application includes a new terminal building alongside substantial changes and additions to the airport.

I objected to this proposed expansion, as did the Members of Parliament for the Leeds Central, Leeds West, Leeds North East and Leeds North West constituencies. It would have an environmental impact upon the people and communities we represent and, indeed, contribute to the situation of environmental danger faced by all of our society - locally, nationally and internationally.

Thousands of objections, from residents and organisations in Leeds and throughout West Yorkshire, were submitted to this planning application to expand Leeds Bradford Airport, which was conditionally approved at the Council Planning Hearing on 11th February 2021.

As I have said previously, in the National Planning Policy Framework (NPPF) used by Councils when evaluating planning applications, paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. It is clear that the proposed Leeds Bradford Airport expansion does not meet the objectives set by the NPPF as it would compromise the ability of future generations to meet their own needs.

One of the key reasons behind the decision to approve the expansion of the airport rested upon the incorrect presumption that emissions from airports and the aviation sector generally are not an issue a local authority has to take into account when assessing planning proposals. This presumption is in contradiction to the Climate Change Committee's guidance to the Government which can be found here: <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

The United Kingdom is under various international obligations to reduce our carbon emissions and under the Paris Agreement the UK is bound to limit the global temperature rise to well below 2C. In addition the UK Climate Change Act commits the UK to be net zero by 2050. The impending climate catastrophe necessitates going further and faster than this, however the proposed Leeds Bradford Airport expansion (20/02559/FU) - literally - flies in the face of even these commitments.

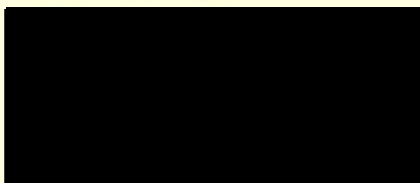
The ultra fine particles that come from jet engines are now one of the major health concerns in relation to any airport expansion. Not only are these produced at take-off and landing but have been found 14 miles from an airport and on the basis would affect people living in my constituency. New research has shown that these particles can have serious adverse health impacts even at levels lower than the current World Health Organisation guideline limits.

Due to the very serious environmental considerations related to this planning application, I am calling on you, as Secretary of State for Housing, Communities and Local Government, to consider the UK's national and international obligations related to this development.

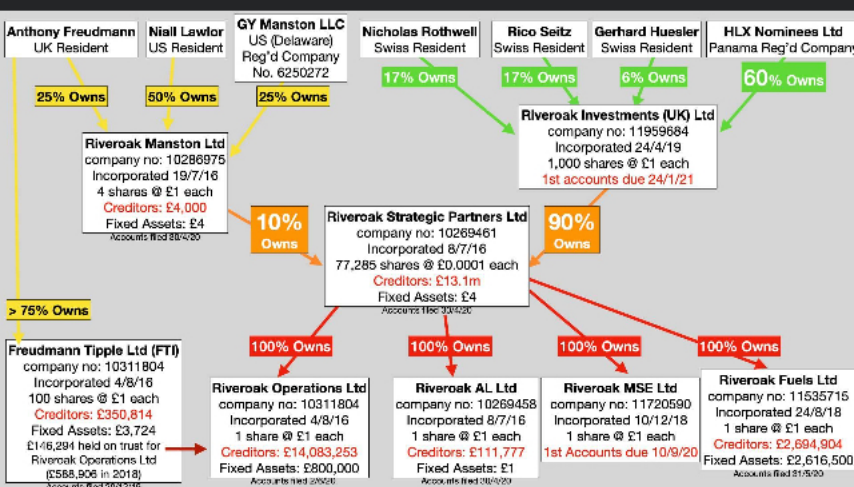
Please take this correspondence as formal notice that I am hereby registering my request that the Government "call in" this planning application, with a full and independent inquiry to rigorously assess this matter.

I look forward to receiving your prompt reply regarding your decision.

Yours sincerely,



Richard Burgon MP



From: [REDACTED]
To: [Manston Airport](#)
Subject: For the attention of the Manston Airport Case Team
Date: 08 July 2021 09:06:39
Attachments: [Lest-we-forget.pdf](#)

Dear Sirs, further to my earlier submission I attach a further document which I urge the SoS to read in order to understand the number of aviation experts who have investigated viability of an airport at Manston and who have all concluded there was no need, a conclusion reached by all 4 planning experts during the examination.

The document also contains record of the oral examination of Dr Sally Dixon who wrote the various expert reports submitted by RSP claiming to support the need for an airport at Manston. You will see much questioning on whether the forecasts provided were backed up by a viability report, essential to any decision on a DCO. The only conclusion able to be drawn from the questioning is that no viability was done and the forecasts provided, used to substantiate the need for an airport at Manston, are just hopes and dreams.

I will be grateful if you can acknowledge receipt of this submission.

Regards Adem Mehmet

Lest we forget

Over the course of the last 10 years much has been written about Manston by the experts. From Infratil's attempts to get the agreement with TDC changed so they could run Cargo freighters at night through to Louise Congdon's appearance at the Oral Examinations in 2019.

They have all been united in stating aviation at Manston will not work mainly due to the geography of where it was situated.

So why does RSP believe pumping an alleged £300million will change the geography is the real question.

In fact the one and only aviation "expert" RSP could find (Dr Sally Dixon "DSD") who claims in her Opus that Manston will achieve in 20 years a cargo tonnage that it has singularly failed to achieve since cargo freighters 1st landed at Manston in 1959.

More on DSD later but now I will list the aviation reports written on Manston.

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Date (appendix)	Report author	Title
09/2010 (A)	Bickerdike Allen Partners	Aircraft Night Noise Assessment Report
08/2011 (B)	York Aviation	ECONOMIC IMPACT OF NIGHT FLYING POLICY
03/2015 (C)	Kent County Council	Manston Airport under private ownership: The story to date and the future prospects
2015 (D)	Falcon Consulting	PROSPECTS FOR THE VIABLE DEVELOPMENT OF MANSTON AIRPORT
10/2016 (E)	Avia Solutions	Commercial Viability of Manston Airport
08/2017 (F)	Avia Solutions	Local Plan Representations –TDC
11/2017 (G)	York Aviation	ASSESSMENT OF CAPABILITY OF MANSTON AIRPORT
11/2017 (H)	York Aviation	Summary
01/2018 (I)	Altitude Aviation	Analysis of the Freight Market Potential of a Reopened Manston Airport
02/2019 (J)	Altitude Aviation	Analysis of the Freight Market Potential of a Reopened Manston Airport - Addendum

Appendix A was produced by Infratil who were proposing a change to the Night Flight Regime agreed in 2000 (under Wiggins later Planestation) which at the time was for ZERO night flights however during the course of their research Infratil had regularly breached this S106 agreed to the tune of 2 night time arrivals a week. Further at appendix B York Aviation were asked to describe the consequences to TDC of not allowing Night Flights. This was York's conclusion

"Importantly, the Airport has identified that the night noise policy needs to be put in place at this time as attracting additional regular air freight services, some of which will need to operate at night, is critical to improving the financial viability of the Airport. Without such operations, and the revenue which they bring,

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*there is a risk that the Airport will not be in a position to sustain its operations and attract additional passenger services over the medium to long term. The growth in forecast passenger numbers over time will also help the viability of the Airport, but whilst such services may reduce the dependency on airfreight overall, **the Airport is unlikely to be financially viable without the forecast mix of both traffic types as set out in the Airport's Master Plan.*** Their conclusion was:-

“5.1 Our analysis of the economic impact of the Night Flying Policy proposed by MSE shows that without the policy, or with stringent night flying restrictions or a ban, the Airport is unlikely to be able to achieve the forecast proposed in the Master Plan.

5.2 The nature of the Airport, and the types of traffic it can serve, means that restricted night time operations may reduce potential passenger numbers in 2018 by 55% over those projected in the Master Plan and could reduce the quality of the network which the Airport can support. This impact would occur despite only a small number of the daily services needing to fall within the night time period as night restrictions would remove the flexibility for based operators such that the full benefits of based aircraft would not be achieved.

5.3 The importance of freight, both now and in future, must also be considered. It plays a valuable role in providing revenue to the Airport as well as supporting the local economy. The future scope for the Airport to become profitable will continue to be reliant on air freight which means this sector must be encouraged to grow. The Night Flying Policy proposed by the Airport would create the circumstances which would allow this growth, by offering the greatest flexibility to carriers, even if, as with passenger services, the majority of flights may still take place during the day time period.

5.4 The combined impact of night time restrictions is not only a measurable loss of 1,450 jobs and £30.3m from the regional economy, but also the risk that the full wider economic benefits of having an airport are not realised, taking away the attractiveness for wider business growth associated with air travel access. Furthermore, the risk may be greater in that if the Airport cannot be made profitable with the restricted operations, then its long term future may be put in jeopardy, along with all the jobs and GVA created by it locally.”

Clearly even back in 2011 the future of the airport depended on attracting Night Flights, and clearly as Night Flights were refused due to local opposition in Ramsgate mainly York were completely correct as the airport was put up for sale in 2012 by Infratil and despite Price, Waterhouse Coopers best endeavours there were no takers for 22 months until Ann Gloag took it and its debts in 2013.

In March 2015 Kent County Council published their report (appendix C) and their conclusion:-

“The truth is that Manston has failed over a prolonged period of time to run as a commercially successful airport.

*Kent County Council gave strong support to various investors but **the reality of commercial aviation at Manston Airport led to very significant losses. In fact, in the 16 years since it was taken into privately ownership it has incurred losses by those who have tried to operate it in excess of £100 million.***

The objective now must therefore be to make sure that we have owners who want to do exciting things on the site and that the land is not left abandoned.

Bristow Group had chosen Manston as its location for the regional search and rescue base; when the airport closed the company decided to locate that base at Lydd. Kent County Council is pleased that this vital service will still be located in Kent. Lydd Airport is also starting a substantial investment programme to extend its runway and construct new aviation facilities.

Surely it is now time to look at a B Plan for Manston.

The driver must be to seize the best opportunity to create a significant number of new jobs and bring prosperity into East Kent.

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RiverOak has not managed to convince Thanet District Council that there is a viable business plan. We believe the new owners have got a credible plan and the financial ability to create substantial numbers of new jobs which will bring prosperity and economic growth to East Kent." Not exactly a ringing endorsement.

Thanet District Council then embarked on a search for an indemnity partner and requested an aviation report from Falcon Consultancy (appendix D) which concluded:-

"Manston would find it difficult to grow both Cargo and Passenger Services without considerable investment including a rail service and an aviation city." (ed note paraphrased)

As TDC couldn't find a suitable CPO partner they tried again. This time commissioning a different aviation expert Avia Solutions. In September 2016 they concluded:-

"AviaSolutions has discussed the re-opening of Manston Airport with a number of organisations and individuals, and carried out a detailed assessment of the air transport market and the potential finances of a re-opened Manston Airport. On this basis of this work, we have concluded that it is most unlikely that Manston Airport would represent a viable investment opportunity even in the longer term (post 2040), and certainly not during the period of the Local Plan to 2031." Further they add:-

"It should be noted that these conclusions are based on a set of assumptions that favour Manston Airport at all times, with examples including above market aeronautical yield, aggressive cost reduction projections and minimal acquisition costs, which, while in our opinion are achievable, would nonetheless require some significant management attention. This attention would be focused on two aspects, securing new business at advantageous aeronautical revenue per passengers from LCC's and structuring the business to take advantage of unit cost reduction through scale. . These would not be assumptions which AviaSolutions would suggest are presented as a Base Case to an Investment Committee considering the proposition, but rather ones describing a potential upside scenario. In our experience, it is likely that an Investment Committee would not consider investing on this basis" In other words anyone taking on Manston as an investment opportunity would have to be bonkers

During the protracted DCO examination two further reports were commissioned. One by the land owner (at the time) Stonehill Park and the other on behalf of TDC completed by Altitude Aviation.

The first was published in November 2017 by York Aviation appendix G) and concluded:-

"Manston is too peripheral for integrator operations serving the UK. Integrators have a strong preference for locations more centrally located in the UK with good road access to all of the major markets. The availability of land for warehouses, for example as suggested in terms of the use of the 'Northern Grasslands' part of the overall airport site, is far less important than a location central to the market and the availability of good road access, neither of which are characteristics of Manston. This would apply equally to the suggestion that Amazon might locate there or that the Airport could become a base for drone operations. It is simply in the wrong place to serve the market being in the far south east at the end of a peninsular, away from the main centres of population and distribution in the UK."

The second was published by Altitude Aviation (appendix I) in January 2018

"2. Executive Summary

2.1. Overview

37. We have undertaken an in-depth review of the Azimuth reports, and developed our own analysis of the future potential for freight at a reopened Manston Airport.

38. Manston has historically played a role as a niche air freight airport. We do not see potential for a more significant role in the future. This is in contrast to Azimuth. Azimuth's forecasts show the airport more than doubling its previous annual freight record in the first year of freight traffic returning. By year 18 of Azimuth's forecast, Manston is forecast to exceed the 2016 freight tonnage at East Midlands Airport (the largest dedicated freighter hub in the UK). This is simply not credible or likely.

Lest we forget

39. We have identified significant weaknesses in the Azimuth analysis and forecasts. The following factors have not been acknowledged and/or adequately reflected:

- There is no overall shortage of freight capacity in the UK or South East specifically. While Heathrow is constrained, there is significant spare freight capacity at the established dedicated freighter hubs at Stansted and East Midlands.
- Cargo activity in the UK has become very consolidated on the 3 cargo hubs (Heathrow, Stansted and East Midlands). All three of these airports have plans to significantly expand cargo capacity, and they forecast strong growth in cargo tonnage. Furthermore, other established passenger airports have the capability of handling much higher cargo volumes if demand existed.
- There has been a strong trend towards bellyhold freight, with the role of dedicated freighters diminishing. The most recent (2017) Department for Transport (“DfT”) forecasts to 2050 assume the number of freighter flights in the UK will remain flat at 2016 levels⁹.
- Trucking is a highly integrated component of the air freight business model, and not merely a substitute for air freighter flights when airport capacity is constrained. The increasing use of truck feeder services is due to cost efficiencies and is not restricted to the UK.
- Manston is in a poor location to serve the wider South East or UK market. Other structural disadvantages include lack of critical mass, lack of a passenger hub, and night flight restrictions. These factors have limited Manston’s role to that of a niche freight airport.

40. We consider the Azimuth freight forecasts to be extremely optimistic, with negligible supporting evidence. In particular:

- Historic performance is ignored (both at Manston or more generally across the UK market – the Azimuth growth forecast for Manston would be unprecedented in a UK context).
- There is a heavy reliance on qualitative techniques, with no substantive attempt to quantify the size of the markets Manston will be competing in, or how it would gain market share.
- Many of the references from published studies are too generic to be meaningful or are taken out of context.
- In making the case for Manston, Azimuth seeks to rely on reports prepared by York Aviation in 2013 and 2015. We share York Aviation’s view, as set out in a parallel report commissioned by SHP, that these reports do not support Azimuth’s conclusion that there would be a substantive role for Manston in the UK air freight industry.

41. Finally, we also view the Azimuth cargo air transport movement (“ATM”) projections for Manston to be very optimistic and again unlikely. The projected average freight loads per flight are much lower than historic levels, and also lower than typically seen at cargo airports specialising in general freight (i.e. with limited integrator presence). Even if the freight forecasts were achieved (which we consider very unlikely), we would anticipate significantly lower numbers of cargo air transport movements.”

When you read every single aviation report almost without exception they conclude Manston is in the wrong place, unprofitable and a small niche player in the aircargo market.

The only exception to this is the report commissioned by Riveroak Strategic Partners and published to support the DCO application. Other than the examination of Azimuth’s report by various experts there is one glaring omission which was discussed at the Oral Examination on Thursday 21st March 2019. This clearly shows that DSD was asked to produce a report which “proved” that a DCO application was the right way to get planning permission granted. The problem as the transcript shows is that she was never required by Riveroak to prove her plan was profitable and therefore sustainable in the long run.

The only conclusion that could be drawn from this fudging of her report was that the government planning laws were being manipulated and clearly the 4 Government inspectors weren’t fooled as they concluded that:-

Lest we forget

Given all the above evidence, **the ExA concludes 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). The ExA considers that Manston appears to offer no obvious advantages to outweigh the strong competition that such airports offer. The ExA therefore concludes that the Applicant has failed to demonstrate sufficient need for the Proposed Development, additional to (or different from) the need which is met by the provision of existing airports.**

Sally Dixon Transcript reproduced in full as appendix K

Transcript of SHP and Dr. Sally Dixon Thursday 21st March 2019

Preamble

Dr. Sally Dixon of Azimuth Associates (DSD). Azimuth is DSD.

James Strawn Barrister for SHP (JS)

At any change of speaker each state who they are so for the sake of brevity I will use their initials

JS starts off by confirming he will direct his questions directly to DSD alone as the author of the Azimuth report which underpins the entire DCO

Transcript

JS "The needs case, we are told, for this DCO, is to be found in the Azimuth report. I have just read the references and paragraph 9.35 identifies that the Azimuth Report considers whether the reopening of the Manston airport in the way intended would be viable. Have you seen that document?"

Mumble

JS "Paragraph 9.35 of the planning statement tells the reader the Azimuth report considers whether reopening Manston Airport in the way intended by Riveroak is viable? That's what it says."

DSD "I'm not going to disagree with you"

JS "Right so. The Azimuth report tells the examining Authority and us whether or not reopening Manston Airport in the way intended is viable."

DSD "The Azimuth Report sets out the full" (break in sound)

JS "I'll try it a different way. You have produced a forecast for the applicant to demonstrate both a need and the viability of that need. Haven't you?"

DSD "No I have produced a forecast and the viability was done separately"

JS "It is essential, isn't it, for a forecast to be forecast to understand whether it is going to occur and consequently whether it's viable? Correct?"

DSD "That is correct"

JS "Are you saying Dr. Dixon that the Azimuth Report doesn't do that exercise?"

Lest we forget

DSD "As I've said the report provides the forecast the viability was assessed separately, I wasn't asked to come up with a forecast which showed viability or not. I was asked to produce a forecast, whether it was viable or not was not in my hands"

JS "Dr Dixon I'm struggling to understand your answers. A forecast is a prediction of what will happen at Manston Airport and therefore for you to be telling the Examining Authority that this will happen or likely to happen you must think it viable mustn't you?"

DSD "I disagree. I was asked to produce a forecast in terms of ATMs and tonnage. **Whether that was viable is not part of the Azimuth Report.**"

JS "So if the Examining Authority wanted to know if your report is likely to come about they will hunt in vain for that in the Azimuth Report? Is that correct?"

DSD "That is correct"

JS "That is helpful, Dr. Dixon, in one sense because we know not to look for that material in your report. Despite what is said in the planning report. Where is that assessment of what you have predicted is viable?"

A period of discussion occurs on the applicant's table

JS "I'm asking you Dr Dixon, because you are the one who wrote the Azimuth Report, and I'm told you are the one to explain the need for this proposal and the need to take all of my client's land. That's where I'm told everything is explained. In fact I'm told your report is explained as the business plan in the Environmental statement. Isn't it?"

DSD "I'm trying very much to help you in that what I have in the Azimuth Report is quite clearly a need case in that there is a need in the SE of the UK for a capacity for dedicated freighters"

JS "That's not helping me and particularly as I have limited time. My question to you was "Your report was described as the business plan in the environment statement. We have established that what you predicted is viable. My question to you is where do I find an assessment of whether what you are suggesting is indeed viable?"

DSD "It is not...er....The business plan....er my forecast could not be described as a business plan"

JS "We are going over things I know, can you please answer my question Dr. Dixon. You talked about how important this is in need terms. Where does anyone find an assessment of what you are predicting as a likely occurrence could occur viably?"

DSD "I suggest that is found in a different document"

JS "Where?"

DSD "I have not been involved in the production of the business plan" "I cannot tell you the answer to that question"

JS "**It's clear it isn't in the summary of the business model for the reasons we discussed yesterday. That doesn't tell you for example how the £306M is financed, the interest on it, what you are going to charge cargo Freighters in order to come from wherever they may be. None of that is contained in that material is it?**"

DSD "That material has been obviously produced. But what I'm saying it hasn't been produced by me and my certainty is that material would be commercially sensitive"

JS "Is the short answer is that there is nothing in the material in front of us that demonstrates the viability of Manston airport?"

DSD "there is nothing in front of us at this time as we discussed yesterday"

Lest we forget

JS "And we recognise at para 9.35 that viability is important. It clearly is Dr. Dixon, as you could produce a report with anything you like as theory but if you cannot deliver in viably it's not going to happen. So it's clearly vital isn't it?"

DSD "Of course that's intrinsic to the case, and that the applicant would not be putting a non-viable proposition before the examining authority"

JS "That assertion we say aren't viable in figures we have demonstrated it isn't viable, if we wanted to find where you have explained to the examining authority we are going to attract 17170 cargo freighters to this airport, we are going to spend £306M the way we are going to charge them will cover our costs we aren't going to find any of that information in the materials before us. If it does exist we need to know where it is, Will we find it is any of the material?"

DSD paraphrase "I cannot help you"

The discussion then confirms that DSD cannot confirm that the azimuth report has been costed nor that the forecast is viable.

Conclusion

Clearly Dr. Dixon has plucked figures from the ether to come up with her forecast of ATMs which was easily demonstrated when her freight forecast divided by ATMs equates to half the historic actual tonnage per ATM. It seems there are forecasts and fairy stories.

It is also clear that DSD was unable to even justify her own forecasting ability but then elsewhere she did concede she has no direct experience in airfreight.

Barry James Thursday, July 1, 2021

From: [REDACTED]
To: [Manston Airport](#)
Subject: For the attention of the Manston Airport Case Team
Date: 08 July 2021 14:35:02
Attachments: [7 Jul - Council - Consultancy Advice - redetermination of the Application for a DCO of Manston Airport.pdf](#)

Dear Sirs, the following independent report has been released today by an experienced aviation consultant. The report concludes that the DCO for Manston Airport should be refused in line with the examiners initial conclusions. Please accept this as a further submission from me.

Please acknowledge receipt.

Regards

Adem Mehmet

<https://www.ramsgatetown.org/upload/docs/7%20Jul%20-%20Council%20-%20Consultancy%20Advice%20-%20redetermination%20of%20the%20Application%20for%20a%20DCO%20of%20Manston%20Airport.pdf>

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



Report

July 2021



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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 Freighter	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 Freighter	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 contained 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

