

To the Secretary of State for Transport Grant Shapps

Dear Sir

We took part in the DCO process expecting to be treated fairly. We were handicapped both financially and in terms of expertise yet still we put our case forward & expected fairness & justice to prevail. It seems we were wrong. We are therefore very angry that Andrew Stephenson decided to pass it despite the examiners recommendations on so many issues to refuse. When this came to a judicial review he was unable to justify his position and conceded on the grounds "the Secretary of State did not give adequate reasons in his decision letter to enable the reader to understand why he disagreed with the Examining Authority Report on the issue of need for the development of Manston Airport". It seems even after a year the SoS could not come up with any evidence to justify his position probably because there isn't any. Are we to take part in this re-determination and provide evidence again that Manston wasn't, isn't and will never be viable for the SoS just to ignore it again and pass the DCO with absolutely no evidence to support his position? Given the spate of poor DCO decisions we suspect public confidence in the government to do the right thing is low

We took part in a process that was obviously biased in favour of the applicant. We have had no help from our two Thanet MPs who seem to have their own agenda & in Craig MacKinlay's case a business relationship with Tony Freudmann when he was CEO at Manston. We have to say we feel Roger Gales continual lobbying for a private company to the exclusion of constituents concerns and who are very worried about the impact of a 24/7 cargo hub on their doorstep extremely inappropriate for an MP. Especially given the recent Greensill scandal and RSP are a company based in the British Virgin Isle. There seems to be no due diligence as to where monies are coming from with RSP funds funnelled through Antony & Eleanor Freudmann's company Freudmann Tipple.

We have to wonder why the onus is on us to provide evidence now when we have already done so several times, doesn't the SoS/DfT do any research? We had four very experienced planning inspectors conduct a long examination into RSP's application where more people took part than any other DCO enquiry with the majority opposing the application. We looked at the submissions from people in favour. Many were from people who never lived in the area and many consisted of "it's always been an airport" and "we don't want houses". Hardy compelling evidence of need? The examiners overwhelming recommendation was to refuse the DCO on many issues. We should not have to point out to the DfT the dire financial straits that aviation is in. Who in their right mind would invest in such a project especially overseen by Mr Freudmann? This is a man who has never run a successful business in his life and has in fact been struck off as a solicitor for misappropriating client funds, at an airport that has failed three times and lost owners, investors, Thanet District Council & Kent County Council millions of pounds. We note Mr Freudmann seems to have availed himself of Google's "right to be forgotten". It seems RSP won't be risking their own money as Mr Freudmann is on record as saying RSP will be looking at finding other investors to carry the project forward financially. The company that has applied for the DCO is a different one to the one that owns it so it will be these investors that will lose their money while the other RSP company will retain ownership of the land. The percentage of pure cargo freight RSP are claiming Manston will handle in their DCO application is fantasy given that it represents 28.5% of the DfT's cargo forecast UK total pre-covid (17,100 ATMs out of 60,000). If you were to draw a circle around other airports catchment area and then draw that round Manston 75% would be sea.

Mr Freudmann is very good with coming out with spin. He says that pure air freight has increased since covid. While this is true in the short term once passenger flights return & bellyhold is available

again these will decrease as bellyhold is cheaper as it is subsidised by passenger tickets. It is worth pointing out that overall cargo tonnage actually decreased by 21% overall last year (CAA statistics) and trade with Europe by 40% since Brexit but the DfT should know that. He says Manston failed due to poor management but fails to say he was in charge during one of the many failures. He says Manston will be a "green" but fails to point out that this does not include planes that will use it or lorries and aviation tankers (there is no fuel pipeline to Manston like at other airports) needed to service it. There is no mention of this in the DCO anyway or commitment in the DCO for Manston to be carbon neutral so they obviously can't be held to it legally. He comes out with gems like hydrogen fuelled & electric planes that will reduce pollution and noise. The truth is this technology is decades away for the sort of use he is talking about. There is also his statement regarding electric barges taking cargo from Manston via Ramsgate port, apart from the fact that no such service exists, who in their right mind would fly into Manston and then muck about loading and unloading goods when they can simply fly for a few more minutes to an airport that has better transport links. Why would you want to just take them further up the Thames Estuary just to load them on lorries to complete their journey anyway?

*** Update apparently the fantasy barges are now to be hydrogen powered***

RSP have planted a few trees in Thanet & seem to think this will offset the CO2 emissions from Manston when the truth is millions of trees would have to be planted every year to offset the sort of operation RSP are proposing. RSP are trying to sell this airport on technology that doesn't exist or is decades away and a commitment to be carbon neutral that is not in the DCO so isn't legally binding. The DCO should be decided on what is feasible & available now.

Mr Freudmann makes statements in which he mentions airlines like KLM & Ryanair. These are designed to give the impression that they will be using Manston. Firstly it is going to be a cargo hub with passenger flights possibly later on. Secondly not one of these companies has shown any interest in using Manston. In fact when KLM left Manston when it shut they were on record as saying they wouldn't be returning. When contacted Ryanair say they have no plans to use Manston. In spite of Mr Freudmann's spin no airline, cargo or passenger, has made any commitment to use Manston or has shown any interest. There has been a conspicuous lack of publicised support for the proposed development from cargo & passenger airlines or air freight logistics specialists at any time before or after the DCO decision was quashed. We are sure if there had been any support at all forthcoming Mr Freudmann wouldn't have wasted the opportunity to capitalise on it with public statements.

RSP are also saying the local plan reserves Manston for aviation only, this isn't true and just more spin. Thanet District councillors could not find any evidence to support that position. Because of this they went against officer's advice and reserved it for aviation just until the DCO was resolved. At that point the local plan will have to be reviewed and if the DCO has failed the land will be reallocated.

There has not been one aviation expert apart from Sally Dixon who has said Manston is viable. When questioned by the DCO examiners she couldn't say whether RSP's business plan was viable. It shut over 7 years ago now. There have been four detailed reports since from aviation experts, Falcon Consultancy, Avia Solutions, Altitude Aviations and York Aviations, all showing that Manston Airport is unviable and unnecessary. These along with fact that it has already failed three times should tell the SoS & DfT all they need to know.

We have contributed to an independent report commissioned by Jenny Dawes. We also understand that Ramsgate Town Council are taking independent advice from an aviation expert which we suspect will echo every preceding experts opinion so we will not go into any great detail here regarding the Manston's viability as it has already been said

We would, however, like to point out

1. The ANPS has been ratified by Parliament & has survived several legal challenges so it looks like Heathrow runway three will go ahead, though there may well be a delay due the effects of covid on passenger numbers. R3 will give Heathrow over a 50% increase in capacity.
2. East Midlands Airport is increasing capacity and has been granted Freeport status by Rishi Sunak. Because of this there will be a lot of investment in infrastructure, manufacturing & warehousing around the airport.
3. This year Stansted Airport won its planning appeal and is also increasing capacity.
4. Gatwick Airport's commitment not to use the second runway (used for taxing now) has ended. If this is bought into play for short haul flights as seems likely, this will increase capacity there dramatically by 55,000 flights.

All these airports are up & running with a proven track records and better transport links than Manston will ever have. All Manston has is a dual carriageway in & out leading to a two lane motorway that often gets snarled up with long delays around the M25 junction at the Dartford Crossing.. With the current situation in aviation due to covid all UK airports will be struggling for many years and will need to retain and increase their market share to survive. They will obviously fight tooth & nail to prevent Manston taking any of that market.

At the recent G7 meeting countries have made long-term targets to reach net zero emissions by 2050, and nearly all have targets to cut carbon in the next decade. The UK has led with a goal of cutting emissions by 68% by 2030 and 78% by 2035, based on 1990 levels. The Sixth Carbon Budget will be enshrined in UK legislation and targets for carbon emissions from UK international aviation will be included from 2033 onwards. Thanet Council have declared a climate emergency and Kent County Council are saying they are going to miss their CO2 targets. Reopening Manston would have a big impact on both of these. The irony is a DCO for something that could have helped locally with reducing greenhouse gas emissions, an extension to the Vattenfall wind farm, was refused. If the government really are serious about climate change they need to start showing it. Refusing this DCO for an airport that simply isn't needed and been shown to be not needed would be an easy start.

The mainstay of RSP's application is that it would create jobs. When it shut Manston employed less than 150 people mostly on part time zero hour contracts. Since Manston shut employment in Thanet has increased. RSP has never actually quantified or qualified what jobs will be available at Manston, they just conjure up notional figures using obscure "multipliers". Mr Freudmann is also on record now as saying that fewer jobs will be available due to automation. As according to RSP it was always meant to be "state of the art" you have to wonder why he has only just come to that conclusion.

The Tourism Economic Impact Study shows that, before the devastating impact of the COVID-19 pandemic, Thanet's visitor economy was valued at £352 million, after welcoming 4.6 million visitors in 2019. Independent research commissioned by Kent's official Destination Management Organisation has revealed that £25 million was spent on average in the local economy each month in 2019, as a direct result of the region's tourism and hospitality industry. The number of tourism jobs across the district showed a 9% increase between 2017 and 2019, to 8,664, accounting for 20% of Thanet's total employment last year. These are government figures. This is a sustainable industry that would dramatically be hit by noisy polluting low flying planes from Manston. This would hit the many small businesses in Ramsgate who rely on tourism; nobody in their right mind would want to visit the area. Tourism to the area is more likely to bounce back quickly from the covid pandemic than aviation and employs more people than a cargo hub at Manston would.

We also noticed that the DCO as passed by the SoS removed any safeguards for residents regarding "late" flights or as we would call them night flights. There was very little protection anyway given that RSP seemed to be the ones who got to decide what exactly constituted a late flight. We wanted to check on the exact wording but it seems the SoS's decision letter along with any reference to it has been removed from the planning inspectorate's web site. The truth is if there hadn't been an airport at Manston in the past no sane person would be suggesting one so close to a town. The DCO is meant to be a balance of public need versus the impact on individuals. No other town would be so close to an airport as Ramsgate should Manston reopen. When you are talking about destroying the health wellbeing & lives of a town of 40,000 plus people with noise & pollution from an airport that has been evidenced to show is totally unnecessary the scales must fall on the side of refusal of the DCO. We just hope the SoS will take note of the evidence this time round and reject the application as he should.

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