

From: [REDACTED]
To: [Manston Airport](#)
Subject: My submission for the attention of the Manston Airport Case Team
Date: 09 July 2021 01:28:44

Dear Sir/Madam,

Regarding the communication from the Department for Transport of 11 June 2021, re the re-determination of the application by Riveroak Strategic Partners for an Order granting Development Consent, Manston Airport, Kent, as an Interested Party I wish to make the following submission.

I have been planning to move to Ramsgate but have had to postpone my plans due to concerns about the adverse effect that the reopening of Manston airport would have on my chosen location in Ramsgate town centre in terms of noise and pollution.

- After a lengthy consultation process, the Planning Inspectorate determined that the *Need* for the proposed application was not founded.
- Independent aviation experts referenced the steady decline in pure air freight demand and the Department of Transport's own declining projections of future pure air freight requirements.
- The enquiry also found there was excess capacity at the major air freight hubs located much closer to centres of demand than Manston is.
- Since the Planning Inspectorate's conclusion that the DCO should not be awarded, further developments have reduced any case for Need.
- The Secretary of State's own decision letter overturning the PINS conclusions failed to show any evidence of Need.

Covid and Need

- The Covid pandemic has had a significant impact on passenger air travel. While the ending of travel restrictions is expected to see passenger levels returning towards pre-pandemic levels, there is also evidence that many passengers will restrict their air travel due to ongoing fears about infection in enclosed spaces.
- There is expected to be a major reduction in business travel as companies reduce travel after having experienced successful communication without face-to-face meeting. Business communication is increasingly likely to be technology-based rather than using far more expensive air travel. Major air operators will increasingly have spare airframe capacity and reduced income, moving their business model away from passengers towards freight.
- There is no desire within the freight industry to move away from existing hubs and relocate to a more expensive, geographically distant and sparsely populated location.

Climate Change and Need

- The main argument against **need** is the urgent requirement to address Climate Change. Air freight is the most carbon-intensive form of transport, and one which needs to be markedly reduced to have any hope of achieving our climate goals. Carbon pricing will increase the cost of air freight relative to other transport and reduce demand in the short term.
- Longer term technical improvements to aircraft, fuel and more efficient routing will all help contribute to reduced carbon emissions but most are a long way into the future, especially for price-sensitive cargo transport, and action is needed now. These measures do not add any weight to the failing argument for developing

Manston Airport.

In its December 2020 report, the Committee for Climate Change stated:

Our recommended pathway requires a 78% reduction in UK territorial emissions between 1990 and 2035. In effect, bringing forward the UK's previous 80% target by nearly 15 years.

And in The Sixth Carbon Budget (Aviation) it states:

The Government should assess its airport capacity strategy in the context of Net Zero and any lasting impacts on demand from COVID-19. Investments will need to be demonstrated to make economic sense in a Net Zero world and the transition towards it.

- *Unless faster than expected progress is made on aircraft technology and SAF deployment, such that the sector is outperforming its trajectory to Net Zero, current planned additional airport capacity would require capacity restrictions placed on other airports.*
- *Going forwards, there should be no net expansion of UK airport capacity unless the sector is assessed as being on track to sufficiently outperform a net emissions trajectory that is compatible with achieving Net Zero alongside the rest of the economy, and is able to accommodate the additional demand and still stay on track.*

Employment and Need

- Another perceived need is for increased employment in the Thanet area, a particularly deprived region, with high unemployment. The redevelopment of Manston does not address that need.
- Strikingly, the Planning Inspectorate concluded that the small number of new jobs generated by the airport would not make up for the fall in employment opportunities caused by the damage to Thanet's tourist and hospitality industries. Post Covid, the increase in 'staycation' holidays will add further jobs that will be threatened by any airport development. As a *fully automated cargo hub* (in the words of Riveroak Strategic Partners) the local employment opportunities will be minimal.
- What we require for the region are sustainable employment opportunities, particularly in the renewable energy sectors. Thanet has significant solar PV and wind farm energy production. Local and central government should be encouraging the development of industries around this production, both manufacturing and engineering support for the wind and solar industries, plus associated industries such as renewable hydrogen production, battery production, low-energy heating solutions, insulation and other industries needed to transition to a low carbon economy.
- The government's own "Ten Point Plan for a Green Industrial Revolution", updated November 2020, stresses the importance of focusing on "*Building back better, supporting green jobs, and accelerating our path to net zero*". The redevelopment of Manston as an air freight hub is completely incompatible with this Ten Point Plan.

I would conclude that this DCO proposal provides no evidence of need, little evidence of benefit to the local region, and considerable evidence of damage to the environment, economy and health of the local community.

Thankyou.

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