

REDETERMINATION OF THE APPLICATION BY RIVER OAK STRATEGIC PARTNERS LTD. FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE REOPENING AND DEVELOPMENT OF MANSTON AIRPORT IN KENT

Submission by the South East Region of the Chartered Institute of Logistics and Transport (CILT)

Introduction

- 1 The Chartered Institute of Logistics and Transport (CILT) is a professional institution with in the region of 18k members embracing all transport modes whose members are engaged in the provision of transport services for both passengers and freight, the management of logistics and the supply chain, transport planning, government and administration.
- 2 This submission is made on behalf of the Kent Group of members which rests within the South East Region of the Institute.
- 3 The South East Region of the Institute has been supportive of the River Oaks process throughout the consultation process having responded to the Community Consultation process in July 2017. Our submission in relation to the redetermination is based on our original views albeit updated to take into account the four specific areas for which views were sought and in particular changes in circumstances over the last 2 years, especially Brexit and the implications of Covid 19.

2. Reasons for supporting the river Oaks Application relating to Recent National Trends

- 1 Covid 19 has had major implications for air freight. Passenger air traffic levels have plummeted since spring 2021 whereas reductions in freight tonnages have been relatively small and are moving towards pre-Covid levels. However freight flights have increased due to the reduced availability of passenger operations where belly hold freight capacity is available.
- 2 The River Oak Plans envisaged a reliance mainly on long haul intercontinental flights rather than short haul to and from Europe. It is becoming clearly apparent from changes to post-Brexit trading arrangements that long haul freight is going to experience considerable increases and on longer journeys where maritime transit times can be very long, the benefits of air freight will be most keenly felt.
- 3 Recovery in passenger demand post- Covid will result in the return of passenger aircraft able to carry cargo and so the trend to all-cargo aircraft will reduce to a degree. But, the recovery in passenger demand is likely to take 3-5 years, with long haul, on which most cargo is carried, being the slowest to recover. In addition an early casualty of Covid 19 was the withdrawal of Boeing 747 passenger fleets which had significant cargo capacity and the use of smaller passenger aircraft on long haul routes such as the A321XLR which have significantly less cargo capacity. This will lead to an upward trend in freight-only flights, particularly over the short to medium term until new generation twin-engine wide bodied aircraft with 20+ ton belly hold capacity become more commonplace.
- 4 Trends in worldwide trade are also significant, with current shortages of maritime capacity and increasing border controls at sea ports which can be expected to lead towards increased air freight demand, particularly in the shorter term.
- 5 Assumptions about capacity at UK airports for cargo have also changed since 2019 due to Covid 19. For example the effects of Covid 19 on air traffic could delay considerably any progress on a third runway at Heathrow which will limit potential freight capacity at the airport in addition to the loss of belly hold capacity referred to above. Stansted's planned expansion is based on mainly low cost passenger operations which have limited potential

for belly hold freight capacity and there is unlikely to be any spare runway capacity for increased dedicated freight operations. East Midlands is the UK's major air freight hub but its geographical location in the UK and severely congested motorway network around and north of London constrain its attractiveness to businesses in the South East and therefore additional air freight capacity south east of London will widen options available to air freight customers.

3. Reasons for Supporting the River Oaks Application relating to local Factors

- 1 There is the hope that extra air freight capacity in the extreme South East will allow some freight traffic to travel directly to and from the UK without transshipment to lorry in mainland Europe, thereby reducing lorry traffic on a particularly congested route.
- 2 Kent, due to its location close to Europe and at the south east tip of the UK, is more directly affected by Brexit than the rest of the UK. The presence of a functioning Air Freight centre with surrounding employment centres will be beneficial in attracting new international trade to the UK and the South East in particular. A particular business sector that Manston could attract is the high-tech sector including bio tech companies such as Pfizer who could be attracted to the business premises close to a working airport available for international business jets, particularly in view of future improved rail access to the new Thanet parkway station on the High Speed line to London St Pancras as well as the availability of an increasing stock of new and established housing in a more affordable part of the south east.
- 3 The economy in the eastern corner of Kent has not kept pace with other parts of South East England and a major employment and trade centre can only be beneficial to this part of the county.
- 4 Although freight traffic is the prime area of the business case for the airport, the additional passenger traffic that is planned will provide a valuable facility for residents from mid- and East Kent that will reduce the need for travel to airports in the London area on particularly congested road and rail networks. This potential traffic is likely to increase over forthcoming years in line with major increases in housing throughout most of Kent.
- 5 Air space within the London area and much of surrounding south east England is extremely congested. Manston, being at the extreme eastern tip of Kent and surrounded by the sea to the north, east and south is one of the least congested airspaces in the South East and the closeness to sea on three sides also minimises the number of residents adversely affected by aircraft taking off and landing. In addition its former RAF status means that it has an extremely long runway which is particularly useful for air freight operations.

4. Other issues for Consideration Including Potential Concerns

1. Assuming that the anticipated trade materialises this would put additional pressure on an already congested road network to, from and across Kent. It is essential that any proposals are accompanied by improvements to the trunk road network in Kent and in particular the additional Lower Thames river crossing, increased capacity on the A2/M2 and M25 and improvements to the M2/A299/A2 to remove bottlenecks, particularly at key junctions including Brenley Corner. The development also needs to be accompanied by improvements to road access between the A299 and the access points within the complex, especially the Manston Road/Spitfire Way crossroads. Good links to nearby rail facilities would also be desirable as well as good bus links between the site and neighbouring towns and residential areas for the benefit of workers and airport customers, ideally also linking with Ramsgate and Ramsgate Parkway stations. If River oaks plans for linking with London via Ramsgate

Harbour and the Thames are to become viable, good road links from the airport site and Ramsgate Harbour will be vital, particularly the routes linking the airport site with the currently underutilised harbour link road.

2. In addition we consider that the wider value of Manston Airport to the UK as a whole has to be taken into account. As well as the local economic value of an operational airport we are also of the view that there must be a tangible benefit to UK national security of an airport with a runway of this length remaining available close to the south east coast of the UK. Although the UK has enjoyed a period of peace since World War 2 the world currently faces considerable uncertainty and allowing the loss of the last remaining RAF-standard airfield to housing or other use in the area of the UK closest to mainland Europe appears to be a highly questionable strategic course of action. Allowing a proposal of this nature to proceed is therefore a sensible and desirable decision on national security grounds.

Response to the submission by the Kent Branch of the Chartered Institute of Logistics & Transport

Link <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005706-South%20East%20Region%20of%20the%20Chartered%20Institute%20of%20Logistics%20and%20Transport%20.pdf>

Firstly I do find it odd that a Chartered Institute would send in a submission that was extremely amateurish in its format.

Part 1

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As there is no name(s) attached to this report it is difficult to know who has written it however as the examination schedule starts in 2019 and there is no relevant representation from the Kent Branch prior to this it is difficult to see what they originally stated. "having responded to the Community Consultation process in July 2017" seems to be missing from this further submission. There is an RR from a Fellow of CILT (below) who is AGAINST the cargo hub

Manston Airport

Received **07 October 2018**
From **Prof David Lane FCILT**
Representation

“ It is clear we need both jobs and housing. Both proposals for Manston therefore have merit.

The upside of the airport proposal is skilled jobs and the ability to attract further businesses to Thanet. The downside is the negative effect on people living in Ramsgate through the number of Flight's including night time the impact on the Development of the port as a leisure and transport facility. It will undermine Ramsgate as a residential area. In particular the stress on the road network will be overwhelming. The increase in heavy goods traffic is not sustainable.

The upside of the Stone Park proposal is the increased housing and leisure options which will add to rather than detract from Ramsgates development. It will bring jobs although not highly skilled ones. The success of the scheme depends on the other businesses it attracts and this is unknown.

Overall the downsides of the airport in terms on negative impacts on Traffic and amenities out weighs the benefits. I therefore oppose the airport development. ”

2. Reasons for supporting the river Oaks Application relating to Recent National Trends

- 1 Covid 19 has had major implications for air freight. Passenger air traffic levels have plummeted since spring 2021 whereas reductions in freight tonnages have been relatively small and are moving towards pre-Covid levels. However freight flights have increased due to the reduced availability of passenger operations where belly hold freight capacity is available.

Firstly you would have assumed that a Fellow of a Chartered Institute would have make more of an effort to get the name of the company they are supporting correct. It is Riveroak Strategic Partners who are asking for a DCO.

Secondly they say *“Passenger air traffic levels have plummeted since spring 2021 whereas reductions in freight tonnages have been relatively small and are moving towards pre-Covid levels”* however in fact passenger levels actually plummeted in March 2020 when the 1st lockdown occurred and during 2020 freight tonnage in the UK dropped by 21% and have only just (Q3 2021) returned to somewhere near pre-covid levels. Source Heathrow Q3 *“Cargo levels have hit 90% of 2019 levels”*. So I do find it difficult to understand why such a basic error has occurred from an “expert” in their professional capacity.

- 2 The River Oak Plans envisaged a reliance mainly on long haul intercontinental flights rather than short haul to and from Europe. It is becoming clearly apparent from changes to post-Brexit trading arrangements that long haul freight is going to experience considerable increases and on longer journeys where maritime transit times can be very long, the benefits of air freight will be most keenly felt.

Riveroak Strategic Partners in the form of Dr. Sally Dixon wrote a very long report, submitted to the DCO examination, which relied solely on 10000 Cargo Atms in pure freighter aircraft. In fact Anthony Freudmann stated he would not attempt to compete with Heathrow as they rely almost entirely on bellyhold cargo.

Finally it is difficult to understand why a Fellow would not point out the massive differential in pricing between Maritime and aircargo transportation let alone the huge difference in volume tonnage.

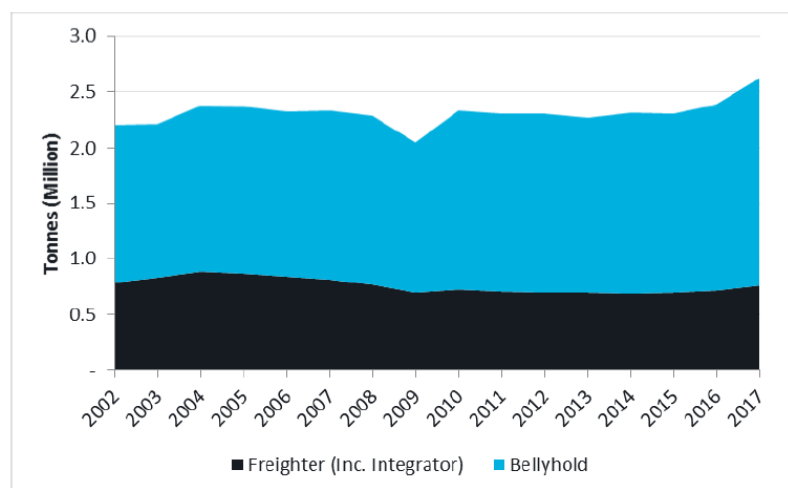
- 3 Recovery in passenger demand post- Covid will result in the return of passenger aircraft able to carry cargo and so the trend to all-cargo aircraft will reduce to a degree. But, the recovery in passenger demand is likely to take 3-5 years, with long haul, on which most cargo is carried, being the slowest to recover. In addition an early casualty of Covid 19 was the withdrawal of Boeing 747 passenger fleets which had significant cargo capacity and the use of smaller passenger aircraft on long haul routes such as the A321XLR which have significantly less cargo capacity. This will lead to an upward trend in freight-only flights, particularly over the short to medium term until new generation twin-engine wide bodied aircraft with 20+ ton belly hold capacity become more commonplace.

“Recovery in passenger demand post- Covid will result in the return of passenger aircraft able to carry cargo and so the trend to all-cargo aircraft will reduce to a degree” whilst true to a degree again the author forgets that there is a differential in pricing for cargo that travels in the belly of passenger aircraft and that which travels without the offset from passengers. In fact the Steer report, which the author should be aware of, has already determined that Cargo ATMs haven’t increased for 15 years and any growth has been in tonnage in bellyhold alone

Volume growth

- 3.6 Figure 3.2 shows the development of total UK freight volumes in the last 15 years. Aside from the decline in 2009 due to the fallout from the financial crisis, total volumes have remained relatively flat, growing with a compound average growth rate (CAGR) of +1.2% over the 15-year period with volumes only surpassing the pre-crisis peak in 2016.

Figure 3.2: UK freight volumes, Million Tonnes (2002-2017)



Source: CAA

steer

October 2018 | 13

It would also be fair to say that passenger long haul will take a while to recover however Manston isn’t in any position to benefit and currently it is a brown field site and will take 2-3 years to fully operational. (I am surprised the author didn’t mention this)

- 4 Trends in worldwide trade are also significant, with current shortages of maritime capacity and increasing border controls at sea ports which can be expected to lead towards increased air freight demand, particularly in the shorter term.

I find this statement quite disturbing as it seems to assume airports don't have border controls.

- 5 Assumptions about capacity at UK airports for cargo have also changed since 2019 due to Covid 19. For example the effects of Covid 19 on air traffic could delay considerably any progress on a third runway at Heathrow which will limit potential freight capacity at the airport in addition to the loss of belly hold capacity referred to above. Stansted's planned expansion is based on mainly low cost passenger operations which have limited potential

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The 1st statement is rather strange however the 2nd is disingenuous in the extreme. *"Stansted's planned expansion is based on mainly low cost passenger operations which have limited potential for belly hold freight capacity and there is unlikely to be any spare runway capacity for increased dedicated freight operations"* To explain Stanstead exchanged Cargo ATMs for Passenger ATMs however the reduction to 16000 CATMs is an upper limit. Their current level of CATMs in 2020 was 10406 leaving a third (5594 CATMs) spare. That is hardly being short of capacity.

It is uncertain where the author is going with their comments about East Midlands are going. The East Midlands airport is centrally placed in the middle of the country, has just been awarded Freeport status and is having built locally a Railfreight/Airfreight/Roadfreight hub employing 7000 workers. Their own webpage states no part of the Country is more than 4 hours away from the Hub.

Anyone who has been to Thanet will know how time consuming the Dartford River crossing can be and there is no sign yet of a Lower Thames Crossing.

It would also pay to remember that Cargo freight has been flown to Manston since 1959 until it closed in 2014 and at no time has it been profitable despite the owners who said it would grow exponentially it simply didn't.

Conclusion

I would love to continue to dissect this "report" however the final paragraph just shows how amateurish it really is

"Although the UK has enjoyed a period of peace since World War 2 the world currently faces considerable uncertainty and allowing the loss of the last remaining RAF-standard airfield to housing or other use in the area of the UK closest to mainland Europe appears to be a highly questionable strategic course of action.

Allowing a proposal of this nature to proceed is therefore a sensible and desirable decision on national security grounds."

If it was questionable why did the RAF sell it in 1998 and why did the USAF move from RAF Manston in 1958 at the height of the cold war?

What is RAF-standard? The only thing on the site that in anyway benefits National Security is the HRDF which Riveroak Strategic Partners is at loggerheads with the Ministry of Defence over. As RSP want it gone thus disrupting National Security,

Finally one wonders what the Chartered Institute would make of this submission as put forward by the Kent Branch of their Institute.

Barry James