

To: Secretary of State for Transport
% Planning Inspectorate,
National Infrastructure Planning

Date: 8 November 2021

Our Ref: SoS/R/001

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For the attention of the Manston Airport Case Team

1. This submission is in response to the SoSFT's letter of 21 October 2021 and specifically paragraph 13 stating that Interested Parties who have submitted re-determination correspondence with any comments on the responses to the First Round of Consultation that they wish the Secretary of State to treat as a formal consultation response should re-submit those comments by 19 November 2021.
2. Accordingly we re-submit our comment to the First Round of Consultation herewith as a formal consultation response to the Second Round of Consultation.
3. Our comment is in response to the submission [TR020002-005776](#)
4. As you will be aware, on 6 September 2021 the DfT ruled out an Airports National Policy Statement review¹ ("**ANPS Review Letter**").
5. We respectfully draw your attention to the last paragraph of Page 4 of the ANPS Review Letter titled the Cumulative impact of growth at other airports.
6. At the start of the said paragraph the Secretary of State states:
"The Secretary of State does consider the impact of other airport growth proposals to be a significant change in circumstances on the basis of which policy set out in the ANPS was decided. However, the growth of other

¹ Available online

at

(accessed 8 November 2021)

airports was foreseen" (underline added for emphasis)

7. The [REDACTED]² did not include Manston Airport, since it had been closed for 4 years at the time of the MBU with a proposal from the landowners to develop the site for housing³. The growth of an airport at Manston was therefore unforeseen.

8. **Conclusion:**

The mitigation of foreseen regional airport growth which the Secretary of State has specified against the significant change in circumstances on the basis of which policy set out in the Airports National Policy Statement ("**ANPS**") was decided clearly does not apply in the case of Manston Airport.

It follows, therefore, that in the event that the DCO is granted, any prospective growth (from a non-operational baseline - i.e. zero ATMs), at Manston Airport would constitute a significant change in circumstances on the basis of which policy set out in the ANPS was decided and would therefore put the ANPS, and/or the MBU at risk of further challenge.

² The Future of UK Aviation: Making Best Use of Existing Runways ("**MBU**"), was developed with a DfT aviation model to look at the impact on carbon emissions and to ensure compatibility with the UK's climate change commitments. This MBU Forecast for United Kingdom (UK) airports (the "**MBU Forecast**"), covered a central demand scenario that included LHR NWR. Department for Transport Disclosures to SSE Freedom of Information Request on Forecasts Projections. Available online at:

[REDACTED] (accessed 8 November 2021)

³ Available online at: [REDACTED] (accessed 8 November 2021)