

From: [REDACTED]
To: [Manston Airport](#)
Subject: Manston DCO Freedom of Information
Date: 12 November 2021 11:40:04
Attachments: [FW: Manston Airport DCO.eml.msg](#)
[FW: Manston Airport DCO2.eml.msg](#)
[Manston Airport DCO.eml.msg](#)
[Peter Forbes - Cllr Green email trail.pdf](#)
[RAMSGATE TOWN COUNCIL - FAO THE MANSTON AIRPORT CASE TEAM.pdf](#)
Importance: High

Dear Sirs

I recently made a Freedom of Information Request to Ramsgate Town Council in relation to their instruction to Alan Stratford & Associates Ltd (ASA), to provide the council with a report on the viability of Manston Airport.

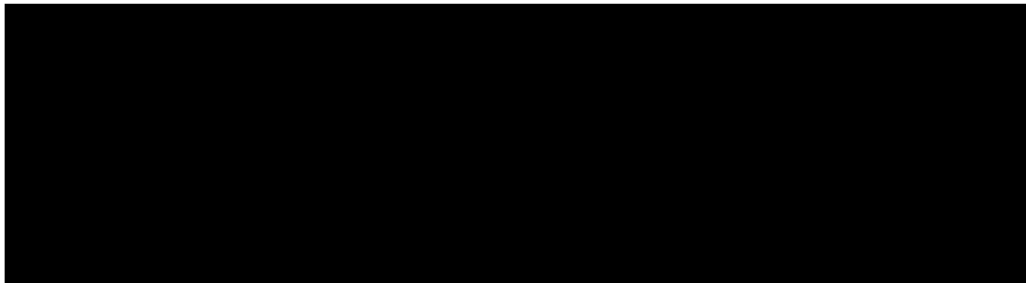
Attached is the reply I received from the council which includes copies of emails, which I wish to submit to you for your consideration and review.

As you can see from the emails between ASA and elected members of the council, the report compiled by ASA is far from independent, and was given a clear anti airport steer by some Councillors.

Subsequently the report and other anti airport material submitted to you by or on behalf of the council, should be considered as misleading.

Regards

Mark Websper BSc(Hons), LRPS



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Peter Forbes
Thu 17/06/2021 17:29



Like



Reply



More actions

To:

• David Green

Hi David

I thought I'd get in touch again as you will no doubt have seen the invitation for interested parties to provide further representations regarding the proposed DCO for Manston Airport.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005360-FINAL%20Statement%20of%20Matters%20-%20Manston%20Airport.pdf>

Is the Council planning to respond to this and, if so, will you require any assistance?

Brgds

Peter

Peter A Forbes | Director
Alan Stratford and Associates Limited



David Green
Fri 18/06/2021 00:06



Like



Reply

Reply all
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?
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To:

- Peter Forbes [REDACTED]
- [REDACTED]

Thank you, Peter,

Yes, Ramsgate Town Council does intend to respond to the SoS Transport's call for evidence regarding what has changed regarding "need" for the facility, paragraph 2 of his statement of matters. We would be interested in any assistance you could offer. We also expect to wish to respond to the independent aviation assessor appointed by the SoS. As you know there is a 9th July deadline for responses. This deadline may be extended. In order to comply with the Council's standing orders, we would need to make a decision whether to proceed with you at our meeting on the 23rd or 30th June and would need to receive your report for our meeting on 7th July.

Could you reply with your terms for providing this assistance in two parts, providing an initial report, and providing a response to the SoS's assessor and the submissions by RSP and other interested parties. Please bear in mind that though the Council is convinced that any decision to proceed with the DCO would be disastrous for the town, it has only limited resources at its disposal.

David

Peter Forbes [REDACTED]
Fri 18/06/2021 16:16

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To:

- David Green

Hi David

Thanks for getting back to me. I'll send you a proposal by Monday night at the latest.

I'm happy to come along to the Council meeting if you feel this would be worthwhile. I would be available on both the 23rd and the 30th although I'm attending a Planning Committee meeting at Buckinghamshire Council regarding another project between 9.30 am - 1.00 pm on the 23rd.

Brgds

Peter

Peter A Forbes | Director
Alan Stratford and Associates Limited

Peter Forbes <[REDACTED]>
Sun 20/06/2021 23:29

[?]

Like

[?]

Reply

[?]

Reply all

[?]

[?]

To:

- David Green

Cc:

- Anne Marie Nixey

Forbes-cv-2020.pdf
68 KB
[?]

Hi David

Thanks for your email.

We can provide a report by 7th July which you can use in a submission to DfT. This would require two days input, which we would charge at £800 per day (ex VAT). It's difficult at this stage to estimate the input needed to comment on the Assessor's report - although I feel it would be possible to limit this to a further four days work. This gives a total of £1,600 ex VAT for the first stage and £3,200 ex VAT for the second stage of this assignment.

For further info, I attach a copy of my CV. Additional information about my company's background and experience shown in our website (see link below).

If you'd like to discuss this further or if you'd like me to come along to a Council meeting, please get in touch. It's usually easiest to contact me on my mobile (see below).

I look forward to hearing from you.

Brgds

Peter

Peter A Forbes | Director
Alan Stratford and Associates Limited



avid Green
Sat 26/06/2021 10:03

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Forward

To:

- Peter Forbes [redacted];
- [redacted]

Good Morning Peter

Just to update you on your offer.

We hope to make a decision at our meeting on Wednesday 30th evening. I am as certain as I can be with any decision of Council that we will get the go ahead. I would take up your offer to speak to us, but it's an evening meeting probably 8-8:30 pm before we get to our item, and I wouldn't want you to be involved in what will be politically contentious.

What I hope to agree is to offer you £2k including vat for your initial report to answer the SoS questions. Council to receive the report in good time before its meeting on Wed 7 July for onward submission by the deadline of the 9th.

This meeting will be a special one to receive the report and will be at 7pm if you are available to attend.

I would also ask your assistance in identifying relevant airport operators that would be adversely affected by a freight hub at Manston and any impact on trade, flight space

congestion or the UK carbon budget; and to communicate with them suggesting they might intervene.

I will also be asking the Council to put aside £4k including vat to employ you to help respond to the SoS's expert report and any submissions by RSP and others, should it be necessary, as I fully expect it will be.

I hope these terms are acceptable. Please confirm.

As an aside, Jenny Dawes, who fronted the JR tells me that she and her lawyers are employing Louise Congdon of York aviation to help with their response.

David Peter Forbes [REDACTED]

Fri 02/07/2021 12:37

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To:

• David Green

Hi David

Thanks for your call yesterday. I'm getting on with the assignment - but I've not yet received any confirmation from the Town Clerk.

Do you know when this will come through?

Brgds

Peter

From:



Subject:

Manston Airport DCO

Dear Peter,

Council agreed the following resolution last night;

“Due to the technical nature of the SoS questions, Ramsgate Town Council (RTC) recognises the need for expert advice before responding.

The short timescales imposed by the SoS has meant a swift negotiation with Peter Forbes of Stratford's, independent experts previously used by Thanet District Council.

They will agree to produce a draft for consideration by Council before the deadline of 9th July 2021.

Their charges are £2,000.00 for the draft. Should RTC require advice in responding to the SoS expert and others, the charge will be an extra £4,000.00.

RTC will be able reclaim the VAT”.

Therefore I write ask you to proceed as per negotiations with Cllr Green, invoicing directly to myself for the £2,000.00 report fee.

The Chair of Council is calling an Extraordinary Meeting of Council at 7 pm on Wednesday 7th July 2021.

Are you able to attend here at the Custom House?

I believe Cllr Green has already advised you of the meeting.

Normally all agenda papers go out on the Friday before the week of our meetings but in this case only the agenda will go out.

It would be appreciated if I was able to send Members something prior to the meeting but obviously this is only possible if you are able to send me something.

Please accept this email as formal appointment to carry out the work on behalf of RTC.

Best regards,

Eileen

Miss Eileen Richford

Deputy Town Clerk and RFO to Ramsgate Town Council



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From:



Subject:

FW: Manston Airport DCO

Here's the original.

Eileen

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From: Eileen Richford

Sent: 01 July 2021 09:20

To:



Cc:



Subject: Manston Airport DCO

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From:



Subject:

FW: Manston Airport DCO

Peter,

See email below sent on Thursday last week.

Please acknowledge receipt.

Regards,

Eileen

Miss Eileen Richford

Deputy Town Clerk and RFO to Ramsgate Town Council



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**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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- 4.2 Sixth Carbon Budget (2033-2037)

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- 5.1 Impacts related to forecasted employment
- 5.2 Airspace Change Proposal
- 5.3 Lack of support from the air freight and logistics sector
- 5.4 Impact on aircraft noise
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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 Freighters	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 Freighters	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 containing 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**

