

TO: Department for Transport,  
Great Minster House  
33 Horseferry Road London, SW1P 4DR  
email: manstonairport@planninginspectorate.gov.uk

23rd November 2021

ATTN: Natasha Kopala

Head of Transport Infrastructure Planning Unit

REF:

Response to the Secretary of States Letter, all interested parties 21st October 2021 with the opportunity to consider the representations received in response to the Statement of Matters, the Secretary of State published representations from the First Round of Consultation on 30 July 2021 and invites comments from the Applicant and representations from the Applicant and any Interested Party on the independent aviation assessor's draft report, and any Interested Party on whether this results in any change in whether the Development would be consistent with the requirements of national policies.

I have made the following observations on the responses made by interested parties in response to the Secretary of States Letter of 21st October 2021. The Arup report has failed to carry out that which it was contracted to do, it has used previously discredited information, given weight to the argument of interested parties at the expense of experts.

Arup quote: *The report by York Aviation on behalf of Jennifer Dawes9 considers other policies*

*in the Plan, such as SP04, are aimed at creating 5,000 jobs in the local areas on identified employment sites, which do not include Manston Airport. The Application site is not identified as an employment site, however SP04 is supportive of all new job creation both within and outside identified employment sites.*

If it was carrying out what it was contracted to do, did it not enquire of Thanet District Council, who, what and when these jobs were, or as suspected plucked from thin air, unlike those in the Riveroak proposals.

MS.L. Congdon of York Aviation at the Stansted inquiry where it was clearly established that she does not qualify as an "expert" within the definitions of that word that must be followed by examiners in public inquiries.

That means that unlike real experts, there can be no rebuttable presumption that what she says is true.

Dr. Sally Dixon, however, does qualify as an "expert" within the terms of that definition.

What she says about matters within her fields of competence must be regarded as true unless proved otherwise beyond reasonable doubt. That's an important distinction to make.

MS.L. Congdon of York Aviation is a Non-expert and may offer opinions, but those opinions carry less weight in public inquiries.

Where two "experts" come to different conclusions on an issue, then the one who has devoted more time and gathered more evidence in support of his/her specific advice and opinions is likely to be regarded as more persuasive by a decision-maker, and with Dr S Dixon PhD (Airport Strategic Planning) MBA (The impact of Ebusiness on the manufacturing sector) MRAeS , an advisory board member on Project Napkin, Led by Heathrow Airport, project NAPKIN (New Aviation Propulsion Knowledge and Innovation Network) is an Innovate UK funded project as part of its Future Flight programme. NAPKIN is developing a model to optimise the introduction of hydrogen and electric/ hybrid aircraft into the UK domestic aviation system. The project is exploring each aspect including aircraft, airport, airspace, airline, passengers, and local communities.

Ms L Congdon BA(SOC SCI) Hons. Geography, it states on her CV, Master of Transport Design but no MA degree achieved . which is the aviation expert here?.

Yet an countless numbers of organisations and individuals use Ms L Congdon's York Aviation work as that of an expert.(See attachment10)

Why have Arup failed to report on what Aircraft manufacturers are finding and doing about the future growth of dedicated cargo aircraft , which is based on demand, an example below , what do Airbus Industries say ,I will leave that for Arup to get after all they are being paid I am not, below is what Boeing have to say

**Source <https://www.boeing.com/commercial/market/cargo-forecast/>**

### **World Air Cargo Traffic Will Grow 4.0% Per Year Over the Next 20 Years**

World Air Cargo Forecast 2020–2039 Freighters Continue to Carry Over Half of All Air Cargo Traffic.Freighters will remain the backbone of the world air cargo industry, and what they say about dedicated cargo aircraft.

Global Freighter Fleet to Grow More Than 60% to 3,260 Over the Next Two Decades ,and much much more on the Boeing site.

Have Arup studied Aircraft Technology Roadmap to 2050 by IATA?Link below.

<https://www.iata.org/contentassets/8d19e716636a47c184e7221c77563c93/technology20roadmap20to20205020no20foreword.pdf>.

Ramsgate Town Councils submission dated 30th July 2021 .link below,  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005680-Ramsgate%20Town%20Council.pdf>,

## Freighters will remain the backbone of the world air cargo industry



Most passenger belly capacity does not serve key cargo trade routes



Twin-aisle passenger schedules often do not meet shipper timing needs



Freight forwarders prefer palletized capacity, which is not available on single-aisle aircraft



Passenger airplane bellies cannot serve hazmat and project cargo



Payload-range considerations on passenger airplanes may limit cargo carriage

And its Predetermination is clear here, with Peter Forbes of Alan Stratford and Associates Limited (ASA) along with the lack of a proper procurement process, and use of public money to carry out the deception, and I submit that this should be dismissed by the Secretary of State ,for it appears to show that :

Cllr Green & Nixey were in contact with ASA before the RTC meetings on 23rd June , 30th June 2021 and 7th July 2021

Cllr Green indicated that the proposal to use ASA would be acceptable to RTC before any such proposal had been put to the council.

Before RTC had discussed the proposal to use the services of ASA:

Cllr.Green had already negotiated a fee for the services of ASA.

Cllr. Green requested ASA's 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**".*

Cllr. Green advised ASA that RTC would set aside another £4000 so they could respond to the secretary of states expert report and any submission made by RSP.

Cllr. Nixey ,chair of RTC , was copied into these emails and had prior knowledge of their content before chairing the RTC meetings.

I therefore ask:

Did Cllr.Green & Nixey act in the best interest of local residents?, were they open and transparent in their actions ? and did they use council taxpayers money correctly?

See attachments :

1 RAMSGATE TOWN COUNCIL - FAO THE MANSTON AIRPORT CASE TEAM.pdf

2 Peter Forbes ...Cllr Green email trail from FOI.pdf

3 Cllr Green .... Peter Forbes Letter from FOI **predetermination outlined in red** .pdf

4 RTC Agenda 23rd June 2021 (No Manston on Agenda)

5 RTC Minutes 23rd Minutes 2021 (No Manston on Agenda)

6 RTC Agenda 30th June 2021 (Agenda item 10)

7 RTC Minutes 30th June 2021 (Minute item 057)

8 RTC Agenda 7th July 2021 (Agenda item 3)

9 RTC Minutes 7th July 2021 (Minute item 061 and (**predetermined**) highlighted comment)

10 The Planning Inspectorate 'What is Expert Evidence'

