Canterbury Christ Church University

manstonairport@planninginspectorate.gov.uk

Attn: Natasha Kopala
Head of Transport Infrastructure Planning Unit

25th November 2021

Dear Ms Kopala

As a senior academic, Head of the School of Engineering, Technology and Design at Canterbury Christ Church University and member of the Manston Skills & Employment Board, I am writing to you to express my concerns with the Independent Assessor's report on Manston Airport.

UK Freight Capacity
In respect to Arup's report section 2.1.1 (last bullet), which sets out the justification for East Midlands Airport (EMA) to be the only freight airport in UK. I query the existence of evidence for this in terms of demand for air freight services around the UK. I also wish to question the protection of a monopoly situation as I thought under government rules there must be competition, fair trade, and a competitive market not monopoly situation of one UK freight airport, in this case EMA.

I would also ask where the evidence is that Stansted Airport has capacity? Indeed, later in the report Arup contradict themselves, admitting that Stansted has limited capacity since the recent expansion plan application has now been accepted, which reduces long term freight capacity. Arup also make no reference of the volume of freight that flies into Amsterdam airport and is then shipped via Dover.

Another thought for consideration is the security risk of single dependency on one major freight airport, considering permanent terrorist threat level in the UK. The blend of couple of freight airports and passenger airports demographically spread across the UK providing freight provision would reduce UKs vulnerability of operating a single point of failure and adaptability in challenging conditions.

External Expert Consultation
I was very much surprised that Arup saw fit to state that there was, "*little evidence that academic and industry experts had validated the approach of the Azimuth Report"* when this comment applies so heavily to the Arup report. The Arup report appears to provide no academic and industry expert analysis. May I ask in particular where is the consultation with businesses across the South East?

Jet Zero
"Overall the Transport Decarbonisation Plan and Jet Zero consultation material do not appear to have a material effect on the need case for the Proposed Development, however they introduce new goals around the carbon impact of airport operations and domestic aviation emissions which should be considered by the Secretary of State in any future decision."

The report does highlight that the carbon zero strategy is commendable. However, my query would be to understand why Manston, as a 'new build airport' is not likely to be better than Stansted and EMA from Jet Zero perspective. With reference to supplying goods to London, would using Manston not be better for the environment than importing to Stanstead or Heathrow or EMA? Has the environmental yearly operational lifecycle of importing goods to each of these airports and transport of these goods by road freight to London been computed, i.e. compute C02 emissions for yearly lifecycle?

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Thanet Local Plan:
"It is concluded that the principle of the Proposed Development is supported by the adopted Local Plan, subject to it being acceptable in other regards. The adopted Local Plan does not advance the need case for the development from that presented at Examination."

In my professional judgement, there is a need to obtain more current and up to date information from local businesses relating to the challenges they face to the expansion of their business, particular moving goods into and out to European and the rest of the world, to their customers. Also, worth considering is the impact this is having on recruitment and retention of staff plans, for example, are problems with transporting goods limiting business expansion therefore business growth and opportunity for career development?

E-commerce section:
"No forecasts of future e-commerce volume or market share have been put forward through the SoM consultation. The Independent Assessor considers that the extent to which recent trends in e-commerce will persist long-term following the Covid-19 pandemic is not yet clear."

The SoS should refer to academic papers on the decline of the High Street, (Turner and Gardner, 2014; Turner and Corstorphine, 2020) and how COVID19 has accelerated change, (Lee and Swann, 2021). It is believed that academics are giving evidence that this trend will continue as millenniums and Gen z have grown up e-commerce shopping, (Kahawandala et al, 2020; Melović et al, 2021).

There has also been academic work undertaken on the vulnerability of supply change, through delays and cancellation of sea freight (Sizov, and Khmelnitskaya, 2021), as highlighted by the blocking of the Suez. In comparison to Zara winning supply change model (Song, 2021; Ha, 2021), enables the business to be efficient, agile and responsive to customer demands, i.e. responding to market trends on weekly and monthly bases. Unlike the traditional retail model, bulk orders to Chinese manufacturers 6 to 12 months in advance for stock that is untested on the consumer.

Freight Demand Future
The Chancellor has given the green light to support every business to physical expand, building new factories and other extensions. Whilst a proportion of 'heavy' materials are moved by sea, other light-weight goods such as door handles, taps, dill bits are made in Germany and/or Italy are moved by air to the UK.

Whilst the B747, A380 and B787 Dreamliner were initially popular, since 2019 the trend prior to COVID19 was to move away from very large multiple engine aeroplanes, (Jackson, 2019). Air France for example has retired its fleet of B747 and A380s. Other airlines have cancelled orders in preference for lighter, narrow and more operationally efficient narrow body aircrafts, for example A737. The impact on freight historically 20% freight is in wide-body aeroplanes, (Saslavsky, and Rastogi, 2020). The aerospace industry already identified this summer the switch to narrow body aircraft is threat to air freight as have less bellyhold, and narrowbody passenger schedules prioritize passenger luggage over cargo, iBid. In addition, as we move to electric planes, mass is going to be even more critical in passenger aircraft design, (Kuln and Sizmann, 2012) including limiting passenger luggage and certainly no or very little bellyhold freight.

Post-Brexit trade
Again, I would highlight smaller goods are typically flown oppose to trucked for example drill bits and medical supplies on next or same day delivery, increasingly will require air freight transportation as more faster than road and cargo shipping can provide from Europe in Post-Brexit trade of operation.

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Longer-term impacts of GDP on freight demand
Considering the recent budget, designed to grow UK GDP, the Arup report is now evidently out of date and not in line with the current Government mandate. The UK Government's own projections, based on the budget, are designed to grow the UK economy, which will support 'build back better', including massive incentives to kick start construction.

Changes in capacity at Stansted Airport
"Nethercourt Action Group argue that the existence of 'spare' CATMs at Stansted and their decision to reduce the cap demonstrate that there was no shortage of dedicated cargo capacity: "Stansted had nearly 10,000 cargo ATMs prior to Covid they couldn't fill & traded 4,000 for extra passenger capacity so where is this crisis in UK airport cargo capacity that RSP talk about? (...) Even with the extra demand due to no bellyhold cargo ATMs only rose by 198 in 2020. Again, disproving RSP's claim airport capacity was limiting air freight" (page 15). "

I would point out that this is rather hearsay opinion/conclusion, based on 2020, which, due to COVID19, is not realistic or valid data and is not a true representation of demand prior or post COVID19.

The report also contradicts itself,

"This reinforces the view that if Stansted meets or comes to close to meeting its cap on passengers per annum, it will be highly unlikely to also provide increased freight capacity in the long term." And yet the report also says that despite the uncertainty at Stansted Airport at the time of the Examination, the ExA's report concluded "that there remains significant freight capacity which the airport operators wish to fulfil".

The report also focuses on an increase in passenger movements, pointing to the opportunity to increase bellyhold capacity. However, this is only true if the aircraft type being used is designed to supports bellyhold and whether freight meets the airline's requirements for bellyhold. The real question is, do airlines who use Stansted have business model and appetite for bellyhold? Since these airlines are predominantly Ryanair, EasyJet, and Jet2, my understanding is that they do not. Ryanair is particularly keen to reduce as much mass as possible in an aircraft to reduce fuel costs, increase operational efficiency and airport turnaround times.

Changes in capacity at East Midlands Airport
The new Freeport that includes EMA is a very compelling argument. Whilst Thanet and Dover made the decision not to apply for a Freeport, which has potentially disadvantaged Dover Port and Manston Airport, there are other Freeports in fairly close proximity to Manston.

In summary, it is clear that the Arup report is very much focused on providing a justification for EMA to be the only freight airport for UK, without competition. In reality, any incident on the M1, A1 and M11, or M25, which happen daily, could be challenging for air freight that could easily be transport within three hours from/to Sussex, Dorset, Kent, etc to Manston.

Yours sincerely,

[redacted]

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