

Thank you for your email asking for my comments in relation to the plans of Riveroak Strategic Partners RSP to re-open Manston airport as a central cargo hub.

I am opposed to the DCO approval based on the following evidence:-

Not of National Significance

The location of the Manston site is not suitable as a central cargo hub.
It's location is not central, but on the tip of the country, which suffers from poor transport links
They cannot change the location.

16 Expert Reports have been written on Manston, including Avia Solutions, commissioned by Thanet District Council, and also York Aviation and Altitude Aviation, which have all reached the conclusion that the RSP proposal for a cargo focused airport at Manston is unrealistic, as the plans are not viable or needed.

When drafting his comprehensive report on aviation in 2011, Sir Howard Davies refused to even include the Manston site, on the basis that it's location made it irrelevant to the aviation of the UK.

Given this massive expert evidence against it, should the PINS DCO recommendation be overturned, it will bring the whole DCO process into disrepute. It will mean anyone can come along with a unrealistic scheme, and use the process to compulsory purchase homes and land.

The main criterion for a successful DCO is the site needs to be proven to be of National Strategic Importance, and in this regard, it has been found to be woefully lacking.

DCO Application

The Planning Inspectorate PINS provided an indepth study of the DCO submission of RSP over a period of about 18 months, which included hearings attended by the public.
Their clear recommendation was that the DCO failed on every count, and should be rejected.

However the Dept of Transport decision letter flew in the face of the PINS recommendation, in that it indicated their decision to approve the DCO based on the premise that there *may* be benefits from the project. Benefits which were not qualified or quantified.

As this was a test case of a DCO for an airport, I think some detail of the reasoning for the overturn of the PINS unanimous recommendation would have been beneficial.

RSP Refusal to Answer the Questions at PINS Hearings

RSP stone-walled the main questions from the Planning Inspectors during the PINS hearings. When the RSP expert, Sally Dixon, was asked if Manston would be financially viable, she responded that she could not answer that, as it was not an aspect she had been asked to assess. During the hearings it also came out RSP had no business plan and had undertaken no costing of landing fees. They refused to provide evidence of their expenditure on the DCO application, in spite of being asked by the examiners. They refused to inform the DCO examiners of any investors, nor could they name any air cargo company or any airline that has committed to use Manston. RSP responded that they had no need to reply, when these were legitimate questions designed by PINS to tease out if there was any merit in their submission.

During the DCO examination RSP tried to manipulate the figures by quoting ATMs from Manston

but having planes only partially loaded compared to tonnage usually carried, in order to bring ATMs up to a level that would be required for a DCO.

RSP went on to say they don't have to prove "need", whereas it is a vital criterion for a DCO. A DCO application has to be of **national strategic importance** and based on **Need** versus the negative impact on peoples' lives and the environment. The DCO application fails on the stated criteria.

Manston site so close to Ramsgate

The Manston site is extremely close to the town of Ramsgate, a town of over 40,000 residents, along with several schools, and a cargo hub would have a great adverse affect on the town and its residents. Documented study shows that aviation affects local populations with pollution, and has a particular adverse affect on the development of children.

Some successful airports have morphed into bigger businesses over time and have caused increasing pressures on surrounding areas, but if the Manston DCO goes ahead, this will be the first decision made to deliberately blight a residential area for the sake of an unnecessary cargo hub.

In recent years' Ramsgate has been in the process of regeneration, with much of it centring on tourism. If Ramsgate became a central cargo hub, it would deprive the area of its main employer, by killing the tourism business.

Night Flights

In the past, even as a small airport, Manston brought noise and pollution over the town of Ramsgate. It had a high percentage of night flights as a percentage of overall ATMs. There is nothing in the DCO application to prevent this being the case again. RSP has claimed it will not use night flights, which has little credibility, as that is the standard operation for cargo airports. That is why the 'need' question is pivotal. All 16 aviation Reports have made a compelling case to show there is 'no need', and this was confirmed by PINS.

Changes since the last round of Submissions

Gatwick Airport has started the consultations needed to apply for a DCO to bring the northern runway into use. This will increase passenger capacity by 21% (from 62million to 75 million) with the associated increase in bellyhold for cargo.

Southend airport passenger terminal has been shut and mothballed since EasyJet & Ryanair pulled out., and are looking for airline companies to replace them

John Holland-Kaye, the CEO of Heathrow Airport, has said that, due to the impacts of Covid and the drop in demand, the runway at Heathrow will not be needed for at least another 10-15 years. Sir Howard Davies, who recommended the expansion of Heathrow airport as part of a 2015 Government review now thinks the pandemic may have derailed the need for the Heathrow project, but underlining that, should a new runway be needed in the south-east, Heathrow would still be the choice.

RSP has claimed that issues with cargo sent by sea is driving demand for air cargo. However, we all know that these issues are temporary, as they have been caused by the sudden return of demand with containers being in the wrong places, and by a shortage of HGV drivers needed to take cargo onto its final destination, causing a backlog at ports. Any shortage of HGV drivers would cause the same backlog at airports, so there is no advantage by flying in of goods.

Brown Field Site

Manston is a brown field site, which is exactly the sort of site the Government has stated should be allocated for much needed house building. However, Thanet Council has removed it from the planning system, against the advice of the planning officers, which has resulted in much house building on prime arable land around Thanet.

Transport Links

RSP and Sir Roger Gale, the local MP, who says he is proud to be referred to as the MP for Riveroak, have stated that the new Parkway Rail Station will provide a good connection for Manston Airport. However, this new station is purely for passengers. There are no sidings or plans for any to handle freight, so it will have no connectivity to forward cargo, as RSP are trying to imply. The main route from Manston to connect to the motorway network is via the A299 & M2/A2 to meet the M25 at Dartford. Both the A299 and M2 consist of just 2 lanes and are very congested. The junction with the M25 and the Dartford crossing is regularly at a standstill. The port at Ramsgate is not being used by any commercial carriers and there is no prospect in the near future.

So RSP's claim that there are good transport links by road, rail & sea are unsubstantiated.

Climate Change

RSP is now saying their DCO should be approved because it will be "carbon neutral and a blueprint for other airports" Firstly carbon neutrality does not make it an NSIP. Secondly there is no legally binding commitment to that end in the DCO, so no guarantee RSP will meet that commitment. RSP has already contradicted itself, with the statement "As aviation propositions go, Manston is unique – because it will be built to be Carbon Net Zero from scratch", whereas in their report, they state that their aim is to become carbon zero over time. Manston cannot be carbon neutral, as its planes would be polluting.

Fuel delivery to the airport would cause huge pollution from daily deliveries of fuel by tankers blocking up the roads. The airport is not connected to the central underground airport fuel system, and so fuel would have to be trucked in daily

RSP claim a green concern as paramount, but this flies in the face of their plan to build an unnecessary airport within a mile of a town of 40,000 plus residents. Manchester Airport Group is already claiming to be carbon neutral, and other airports will follow suit. Being carbon neutral does not make it of National Strategic Importance or of "need", which are the criteria for a DCO.

Should the Manston DCO be passed, this would send out a very negative message of contradiction to our Government's Green Agenda.

RSP Job Claims Rejected by PINS

There is no justification on the basis of employment, as it has only ever added a few part-time jobs. The choice of a cargo hub will be a larger operation, but the model for that is high automation, not job creation.

Unemployment has fallen substantially in Thanet since the airport closed in 2014. Overall Thanet unemployment has fallen by 27.2% since that date, with the rate in the 18-24 age group falling by 32.9%.

Hospitality and tourism are the main employers in Thanet, specifically in the 18-24 age group. This sector has been badly hit by the covid shutdowns, but we are already seeing new business start-ups in this area, bringing much needed jobs to the region.

The PINS examiners concluded RSP's job projections were flawed, as every job gain at Manston would be at the expense of another. They pointed out that the location of the proposed cargo hub would cause low flying planes right over the town itself, which would not be conducive to tourists, due to the noise and pollution. Therefore they concluded that a cargo hub would have a negative effect on employment in the town due to a reduction of tourist numbers.

RSP has never qualified or quantified the jobs that would be available at Manston, they have just picked a number and used some obscure "multipliers" to come up with an unrealistic number.

The Tourism Economic Impact Study shows that, before the impact of covid, Thanet's visitor economy was valued at £352 million, after welcoming 4.6 million visitors in 2019. Independent research commissioned by Kent's official Destination Management Organisation has revealed that £25 million was spent on average in the local economy each month in 2019, as a direct result of the region's tourism and hospitality industry. The number of tourism jobs across the district showed a 9% increase between 2017 and 2019, to 8,664, accounting for 20% of Thanet's total employment. These are government figures. This is a sustainable industry that would be dramatically hit by noisy polluting low flying planes. This would hit the many small businesses in Ramsgate which rely on tourism, and who all contribute to the national economy.

We can already see the green shoots of recovery, as new cafes and hotels open in the area. A cargo hub, which would be largely automated, could not compete on the employment criterion, and would have a huge negative impact on the main employers in the area.

Views of Kent CILT and Increase in Heavy Goods Traffic

RSP have expressed great reliance on a Report of the Kent branch of CILT, the Chartered Institute of Logistics & Transport. As Sally Dixon of Azimuth Aviation is a paid advisor to RSP and also a member of the Kent branch of the CILT, there is a potential conflict of interest.

The Report of the Kent Branch of the Chartered Institute of Logistics and Transport ignores the regular major traffic problems around the Dartford Tunnel

The Kent Branch of CILT are not unanimous in their opinion, as two Fellows of CILT have come to different conclusions:

Mr Peter Forbes of Alan Stratford Associates, wrote the Report commissioned by Ramsgate Town Council, in which he concludes:-

"(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 DoT'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”

and Professor David Lane FCILT, who issued the following statement in 2018:-

“It is clear we need both jobs and housing, Both proposals for Manston therefore have merit. The upside of the airport 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 flights 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
.... **I therefore oppose the airport development”**

RSP Compensation

RSP received £8.5m from the DoT as part of the covid airport compensation payments, when it has not been an airport since 2014, when it was closed. At the date of this compensation, the site was without planning permission, and so work could not have even started on the site. The first step is the resolution of the HRDF relocation with the MOD, which has failed so far. They have no CAA aerodrome licence or flight paths. As the site is not an airport, this payment is puzzling. There have been several freedom of information requests to the DoT regarding this money, but no explanation to justify this payment has been offered.

Conclusion

Manston is situated in the wrong location for a central cargo hub.

The expert conclusion of PINS was that the DCO fails on every count, and should be rejected.

All 16 expert aviation reports on the subject confirm the view that the damage caused to the residential area would outweigh any possible benefits of a cargo hub. They concluded that Manston is not needed and would not be financially viable.

Also, it does not satisfy the conditions of a DCO in that it is not of national strategic significance, nor of demonstratable “need”.

Therefore the Secretary of State for Transport should be urged to follow all the evidence, and confirm the clear recommendation of the PINS Planning Inspectors to reject this DCO application.

Diane Loveday