

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

Date: 30 November 2021
Our Ref: SoS/R/028

Email: manstonairport@planninginspectorate.gov.uk

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 4
2. We 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 independent aviation assessor's draft report ("IAAR") [[Manston DRAFT Assessors Report](#)] (For ease of reference we will be following the Independent Aviation Assessor's numbering)

Chapter 3, Pages 9 and 10 of IAAR [[Manston DRAFT Assessors Report](#)] : Significant Barrier to Reopening Assumption

4. We respectfully disagree with the last sentence of Chapter 3 at the top of Page 10 of the IAAR [[Manston DRAFT Assessors Report](#)] as it is simply not possible to make any assumption as to the date of any potentially reopening. The Applicant has twice failed Step 2 of a seven step process with the Civil Aviation Authority ("CAA"), and the CAA has stated that a full indicative timeline for airspace cannot be confirmed
5. As you will be aware, in order to reopen that Applicant not only requires planning permission for the land but also airspace and an aerodrome certificate as the Proposed Development is not for a cargo warehouse but for a cargo-led *airport*.
6. The airspace change process is the process by which the CAA decides whether or not to approve a proposal to change UK airspace. Airspace is the portion of the atmosphere controlled by a State above its territory and areas

over the sea within which a State is committed by international treaty to provide air navigation services (which includes air traffic control)¹ without it the Applicant cannot deliver any part of its cargo-led proposal.

7. In fact, the Applicant noted to the ExA at ISH4 [REP5-024] that the airspace change process would have to commence before the DCO process was complete and that it would have to be run in a parallel and complimentary manner² and at the time of the Examination the Applicant's stated timeline for Step 2 was 27 March 2020 with a target AIRAC of December 2021. This led the ExA to conclude the airspace change process would be complete by March 2022³.
8. However, since the ExA Recommendation Report the Applicant's Airspace Change Proposal ("**ACP**") - a seven step process - has not progressed past Step 2 with the Civil Aviation Authority ("**CAA**") concluding on two separate occasions: 1 April 2021 and 20 August 2021⁴ that:

"The CAA has completed the Develop and Assess Gateway Assessment and is not satisfied that the change sponsor has met the requirements of the Process up to this point. The CAA does not approve progress to the next Step".
9. Since the close of the Examination the timeline for Step 2 of the airspace change process and the target AIRAC has slipped 7 times without progression with the CAA concluding in October 2021 that the full indicative timeline for this ACP cannot be confirmed⁵.

Date	of Indicative	Indicative Timeline	Target AIRAC
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¹ [REDACTED] (accessed 30 November 2021)

² Paragraph 6.9.80 of the ExA Recommendation Report. Available online at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (Accessed 10 November 2021)

³ Paragraph 6.9.122 of the ExA Recommendation Report. Available online at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (Accessed 10 November 2021)

⁴ Available online at [REDACTED] (Accessed on 10 November 2021)

⁵ Available online at: [REDACTED] (Accessed on 10 November 2021)

Timeline Update	for Step 2	
12 September 2019	26 June 2020	August 2022
8 April 2020	26 February 2021	August 2022
28 May 2020	25 June 2021	March 2023
29 October 2020	29 January 2021	April 2023
19 November 2020	26 March 2021	April 2023
20 April 2021	30 July 2021	August 2023
18 October 2021	29 April 2022	<i>"Until iteration two of the airspace change masterplan including the associated programme plan has been assessed and accepted by the CAA and Department for Transport as co-sponsors of airspace modernisation, the full indicative timeline for this ACP cannot be confirmed. The Define and/or Develop & Assess Gateway(s) above are subject to change⁶".</i>

10. Further, at the time of the Examination⁷ the Applicant stated that the work on the Aerodrome certificate would be completed by the end of 2020 following which the certificate would be applied for. As of 30 November 2021, the site does not have an Aerodrome Certificate⁸. The Aerodrome certification

⁶ Available online at: [REDACTED] (Accessed on 10 November 2021) specifically the Indicative Timeline Update October 2021 added 20 October 2021.

⁷ Paragraph 6.9.77 of the ExA Recommendation Report. Available online at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (Accessed 10 November 2021)

⁸ Available online at:

[REDACTED] (Accessed on 30 November 2021)

process is a lengthy process which requires *inter alia* an aerodrome manual to be agreed with the CAA⁹.

11. Therefore it is simply not possible to make any assumption as to the date of any potentially reopening.

**Chapter 4, Paragraph 4.2 Page 11 of IAAR [[Manston DRAFT Assessors Report](#)] :
ANPS Review Letter and JetZero**

12. We respectfully make reference to our submissions to the 2nd Consultation SoS/R/001 and SoS/R/031.

Chapter 4, Paragraph 4.3 Pages 13 and 14 of IAAR [[Manston DRAFT Assessors Report](#)] : Thanet District Council Local Plan : Policy SP07

13. We agree with the Independent Aviation Assessor (“IAA”) that the Thanet District Council Local Plan (“**Thanet Local Plan**”) does not advance the need case for the development from that presented at the Examination.
14. However, we would respectfully remind the IAA that the Thanet Local Plan is intended to take a ‘neutral’ stance on the future use of the Proposed Development site with a commitment to review the Thanet Local Plan once a decision on the DCO has been made.
15. As you will be aware, in the Report on the Examination of the Thanet Local Plan by the Inspectors appointed by the Secretary of State at Paragraph 223¹⁰ states: *“**223. In 2018 RiverOak Strategic Partners (‘RiverOak’) submitted an application for a DCO to reopen the site for an air cargo operation. Rather than await the outcome of the DCO, paragraphs 1.38-1.45 of the Plan are intended to take a ‘neutral’ stance on the future use of the site, with a commitment to review the Plan once a decision has been made. When considering the need for Thanet to have an up-to-date plan in place, this is an entirely reasonable and appropriate strategy**”* (bold added for emphasis).

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_____. (Accessed on 30 November 2021)

¹⁰ Report to Thanet District Council, Report on the Examination of the Thanet Local Plan of 22 March 2020 with File Ref: PINS/Z2260/429/6 Available online at:

_____. (accessed on 30 November 2021)

16. We, also, respectfully make reference to the adopted Thanet Local Plan 2020¹¹ which states at:

Para 1.38 The Council recognises that proposals are being put forward by RiverOak Strategic Partners for an airport operation at the site, through a Proposed Development consent order (DCO), pursuant to the Planning Act 2008. The application is before the Secretary of State for consideration and the proposals are subject to thorough scrutiny as part of this process. A DCO, if granted, would give consent for the project in recognition of its national importance and may also include authorisation for the compulsory acquisition of land to assist in the achievement of its objectives.

Para 1.39 – If a DCO for Airport use is granted, the early review of the Plan will need to take this into account as well as its implications for other policies in the Plan and consequential land use considerations. **In the event that the DCO is not granted or does not proceed, the Council will similarly need to consider the most appropriate use for the site as part of the early review** (bold added for emphasis).

Policy SP07 – Manston Airport as identified on the Policies Map is safeguarded for airport related uses. Whether or not the DCO is confirmed, the future use and development of Manston Airport and/or other policies affected by the outcome of the DCO process will be determined through the early review of the Plan."

Chapter 4, Paragraph 4.3 Pages 13 and 14 of IAAR [[Manston DRAFT Assessors Report](#)] : Thanet District Council Local Plan : Policy SP03

17. The Proposed Development has been submitted and accepted in the Call for Sites as part of the early review of the Thanet Local Plan¹².
18. The Proposed Development is a brownfield site.

¹¹ Paras 1.38, 1.39 and Policy SP07 Thanet District Council Local Plan Adopted July 2020. Available online at: [REDACTED] (accessed 15 November 2021)

¹² [REDACTED] (accessed 16 November 2021)

19. The New Settlement mitigation study¹³ recommended a number of measures that could make a settlement more sustainable and also carried out an assessment of potential new settlement sites. It was concluded that the former Manston Airport (the Proposed Development site) represented the most appropriate site due to its size and nature as a brownfield site¹⁴.
20. Further, the (Jentex) former Fuel Depot which is an additional part of the Proposed Development is a brownfield site. It would deliver between 8-20 dwellings¹⁵. By redeveloping brownfield land, pressure would be lifted from other sites that retain a greater greenfield, agricultural and/or biodiversity value to the district.
21. The previous owner of the site Stone Hill Park (who has a covenant with the Applicant for housing as part of its sale conditions) had a mixed use development lodged with the Thanet District Council planning department¹⁶.

Chapter 4, Paragraph 4.3 Page 14 of IAAR [[Manston DRAFT Assessors Report](#)] :
Harm to Strategic Policies 1 and 2

22. In the penultimate paragraph of Chapter 4 found on Page 14 of IAAR, the IAA makes reference to Strategic Priority 1 and Policy SP04 aimed at creating 5,000 jobs in the local areas on identified employment sites which do not include Manston Airport.
23. As you will be aware, in determining Job Growth Para 1.23 and Policy SP04 target of a minimum of 5,000 jobs, Thanet District Council set aside the Proposed Development to calculate the number of jobs¹⁷ (ie: Policy SP04 is not dependent on or reliant in any way upon the Proposed Development).

¹³Thanet District Council New Settlement Mitigation Study Summary Report 11 November 2016
Available online at:

[REDACTED] (accessed on 15 November 2021)

¹⁴ Page 1 Thanet District Council Thanet Local Plan Revised Options Sustainability Appraisal June 2018 Available online at

[REDACTED] (accessed on 30 November 2021)

¹⁵ Pages 115-117 Sustainability Appraisal Addendum Report Issue 4| 3 October 2019 Available online at: [h](#) [REDACTED]
(accessed on 30 November 2021)

¹⁶

[REDACTED] (accessed 30 November 2021)

¹⁷ Para 230-231

[REDACTED]
(accessed 30 November 2021)

24. Thanet Economic and Employment Assessment estimates that between 1,200 and 5,100 jobs will be created up to 2031¹⁸. The lower estimate assumes that the economy will return to recession, with 1,900 fewer jobs than the baseline estimate (of 3,100 jobs). Based on calculations provided by the Council around 2,300 total jobs had already been created between 2011 and 2017. The job growth figure in Policy SP04 is therefore reasonable and justified without the Proposed Development¹⁹. It is perhaps of note that Thanet District Council submitted evidence to the Planning Inspectorate examination of the Thanet Local Plan that a review of the housing land position would be required if the DCO is granted²⁰.
25. There is no support for or dependency on the Proposed Development in Strategic Priority 1. However, the Proposed Development may be of minor/moderate/significant harm to the Thanet District Council achieving the job growth figure of 5,000 (Job Growth Para 1.23 and Policy SP04) as the higher estimate of 5,000 jobs assumes positive growth in the culture, visitor economy and 'green economy'²¹.
26. Culture, visitor economy and the green economy are all sectors which the Proposed Development will put at risk and areas that are currently supported by recent private investment (for example the £50 million+ beachside development the Royal Sands²²) and public investment (for example the successful Levelling-Up bid Ramsgate Future in addition to the Ramsgate HAZ, Ramsgate Future High Street Funds and the Ramsgate High Street Heritage Action Zone schemes). We evidence the impact the Proposed Development will have on the successful Levelling-Up bid Ramsgate Future and therefore on Strategic Priority 1 and Strategic Priority 2 of Thanet Local Plan in our submissions to the 2nd Consultation SoS/R020 and SoS/R/025 .
27. We respectfully remind the IAA that the ExA concluded and recommended

¹⁸ Para 230-231

(accessed 30 November 2021)

¹⁹

(accessed 30 November 2021)

²⁰ Page 10 Thanet District Council's Answer to Q7 Available online at:

2021)

²¹

(accessed 30 November 2021)

accessed 18 November 2021)

“that the Proposed Development would have an adverse effect on the aims of the [Ramsgate] HAZ for Ramsgate to grow into a prosperous maritime town where outstanding heritage and architecture coupled with new investment and development strengthens the economy for the benefit of the local community²³”.

28. This also directly contravenes Strategic Priority 2 in addition to Strategic Priority 1 of the Thanet Local Plan, which sets out the importance of regeneration of Thanet's coastal town centres and this includes *“assisting Ramsgate to achieve its full potential capitalising on its historical and nautical heritage and visitor economy²⁴”*
29. Further, the ExA concluded and recommended that the Proposed Development would have an adverse effect on tourism in Ramsgate²⁵. (ie contrary to Strategic Priority 1)
30. Thanet District Council confirmed its view in the examination that: *“...whilst the proposed development may bring further tourists to the area, the amenity impacts from the construction and operation of the proposed development may adversely affect the tourism industry in Ramsgate and the wider Thanet area and weigh against any proposed benefit²⁶”*. (underline added for emphasis) (ie contrary to Strategic Priority 1)

Chapter 5, Page 15 of IAAR [[Manston DRAFT Assessors Report](#)] : No Need

31. We strongly support the submissions of 4 independent experts since the Examination that agree there is **no need for the Proposed Development** as evidenced in:

²³ Para 6.3.183 of the ExA Recommendation Report Available online at:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed on 15 November 2021)

²⁴ Page 16,

(accessed 18 November 2021) Strategic Priority 2

²⁵ Para 6.10.142

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed 30 November 2021)

²⁶ Para 6.10.121

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed 30

- a. [ExA recommendation Report.](#)
- b. [Independent Aviation Assessor Report](#)
- c. [Ramsgate Town Council's independent aviation expert's report](#)
- d. [Jenny Dawes' independent aviation expert's report](#)

32. Further, we strongly support the submissions to the 2nd Consultation of the Ramsgate Town Council, Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert.
33. We respectfully remind the IAA there have been numerous reports by independent aviation assessors over the past 10 years (including but not limited to Avia Solutions, Falcon, Altitude Aviation etc) and Kent County Council's position statement on Manston Airport²⁷ that have evidenced that there is no need and/or the Proposed Development is not viable.

Chapter 5.2.1, Page 15 of IAAR [[Manston DRAFT Assessors Report](#)] : E-Commerce

34. We strongly support the comments made within the submissions of [Ramsgate Town Council's independent aviation expert's report](#) and [Jenny Dawes' independent aviation expert's report](#).
35. We strongly support the conclusion reached at the top of Page 21 of the IAAR [[Manston DRAFT Assessors Report](#)].
36. Save Manston Airport Association ("SMAa") in its submission to the 1st Consultation Round at [[TR020002-005824](#)] rely on global data to support and evidence an e-commerce localised East Kent proposal. This is deeply flawed logic²⁸. What happens globally is not a predictor of what might happen at a localised East Kent proposal particularly when the World's biggest online shopping event²⁹ is China's Singles Day.
37. Furthermore, this year China's Singles Day saw a surge in nationalistic

²⁷

[REDACTED] (accessed 30 november 2021)

²⁸ [[TR020002-005824](#)]
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005824-SMAa%20matter%202%20part%201%20and%20part%202.pdf> (accessed 30 November 2021)

²⁹ **China's Singles' Day sees surge in 'nationalist' spending as home-grown brands storm sales charts** South China Morning Post 20 November 2021 Available online at:

[REDACTED] (accessed 30 November 2021)

spending with *"Internet searches for domestic goods rose by 42% during this year's Singles' Day, the steepest rise in the past three years, according to data from search engine Baidu³⁰"* and *"Chinese e-commerce giant JD.com, which hosts Singles' Day discounts, reported a 105% year-on-year sales increase among heritage brands - spanning traditional food, medicine and clothing - the night before the main shopping day on Nov 11³¹"*. The penchant for home-grown goods in China remains after the Singles' Day sale frenzy, and analysts agree that *"Guochao"* - popularity of Chinese-made goods is part of a trend known as 'Guochao', which reflects growing interest in local brands - is far from a temporary craze³². The *"Guochao"* trend has also coincided with party doctrine introduced by President Xi Jinping in 2016 called *"cultural confidence"*, which calls for citizens to affirm and be proud of their history, values and culture for national advancement³³.

38. There are similar trends across the world as well as large fashion brands turning their backs on Asia. For example Benetton and Hugo Boss are moving to locations closer to final markets³⁴ and according to its 2020 annual report, Inditex, which owns fashion brand Zara, is now producing 53% of its output in Spain, Portugal, Morocco and Turkey³⁵.
39. Global trends cannot nor should not be used as evidence for a localised East Kent proposal.

³⁰ **China's Singles' Day sees surge in 'nationalist' spending** Bangkok Post 21 November 2021 Available online at:

[redacted]
(accessed 30 November 2021)

³¹ **China's Singles' Day sees surge in 'nationalist' spending** Bangkok Post 21 November 2021 Available online at:

[redacted]
(accessed 30 November 2021)

³² **China's Singles' Day sees surge in 'nationalist' spending as home-grown brands storm sales charts** South China Morning Post 20 November 2021 Available online at:

[redacted]
(accessed 30 November 2021)

³³ *Ibid*

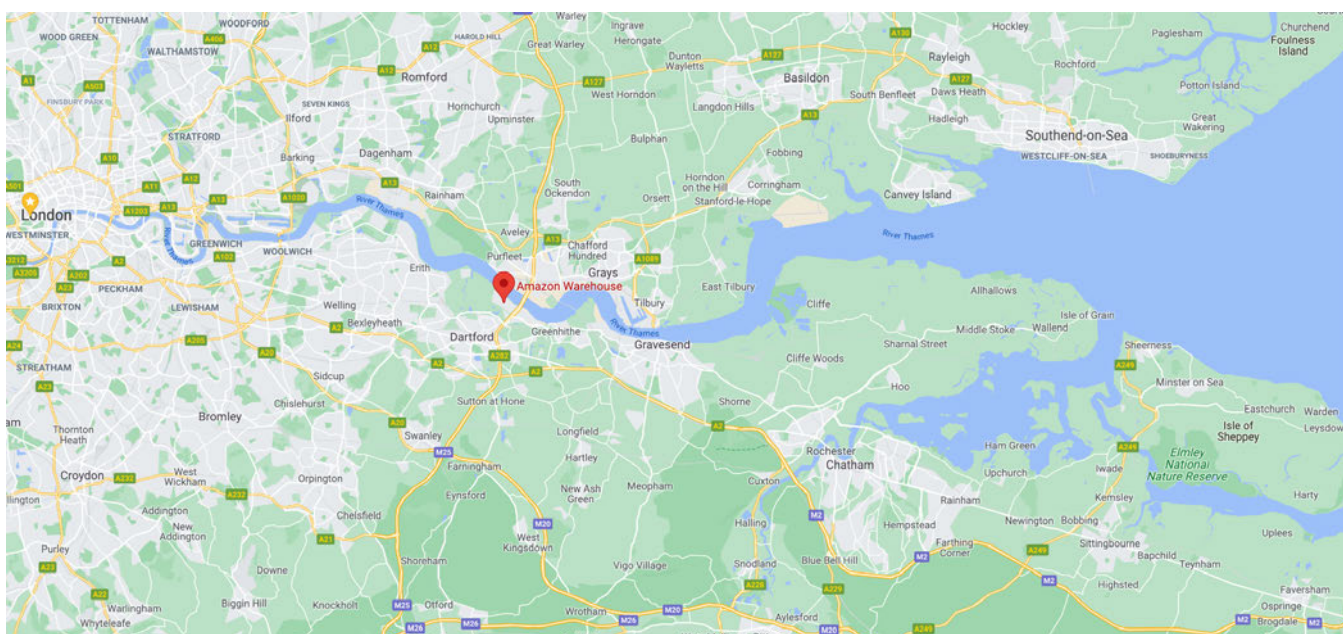
³⁴ **The Fashion for Near-Shoring Expands, with 'MicroFactories' a Growing Trend** Loadstar 9 November 2021 Available Online at:

[redacted]
(accessed 30 November 2021)

³⁵ **The Fashion for Near-Shoring Expands, with 'MicroFactories' a Growing Trend** Loadstar 9 November 2021 Available Online at:

[redacted]
(accessed 30 November 2021)

40. SMAa in its submission to the 1st Consultation Round at [\[TR020002-005824\]](#) makes much of Amazon's mega-shed at Dartford.
41. For the avoidance of any doubt, the Amazon's mega-shed at Dartford is within London's orbital M25 motorway and built adjacent to QE2 Bridge, Dartford Tunnel and on the south bank of the River Thames.
42. Amazon say the location will mean it's project a *"rare asset so close to the heart of London," will benefit from "exceptional transport connectivity via motorway, rail and water, excellent infrastructure, significant power provision and a robust labour market"*³⁶.



43. The Amazon mega-shed is 30 minutes from London City Airport; 31 minutes from London Biggin Hill Airport; 38 minutes from Gatwick Airport by the M25/M23; 40 minutes from Southend Airport; and an hour from Heathrow Airport by the M25.
44. Perhaps more importantly it is almost just across the River Thames

³⁶ Littlebrook, Dartford to get £200m Amazon Mega Warehouse News Shopper 15 June 2020 Available online at:

(accessed 30 November 2021)

waterway to Tilbury Docks or only 19 minutes from Tilbury Docks by road³⁷ and located on the River Thames to use the waterways for water freight access to Central and Greater London.

45. In comparison the Proposed Development is 75 minutes by car on the A299/M2/M20/A282 and over 5 hours by sea from the Amazon mega-shed³⁸ ((evidenced in our submissions to the 2nd Consultation at SoS/R/012 (see Pages 25-28 and Paragraph Y)).
46. As you will be aware, in numerous successive governments, policy documents and statements³⁹, dating back at least twenty eight years Manston Airport has been fairly considered and has consistently been rejected by the Government, largely on the grounds of poor geographical location with regards to distance from sources of demand and proximity to Ramsgate. Needless to say, the geography has not changed in the past twenty eight years, nor is it likely to in the period to 2050⁴⁰.
47. Further, we respectfully remind the SMAa and the IAA that:
- a. The Proposed Development has no access to Rail freight (evidenced in

³⁷ Source Google Map

³⁸ Source Google map

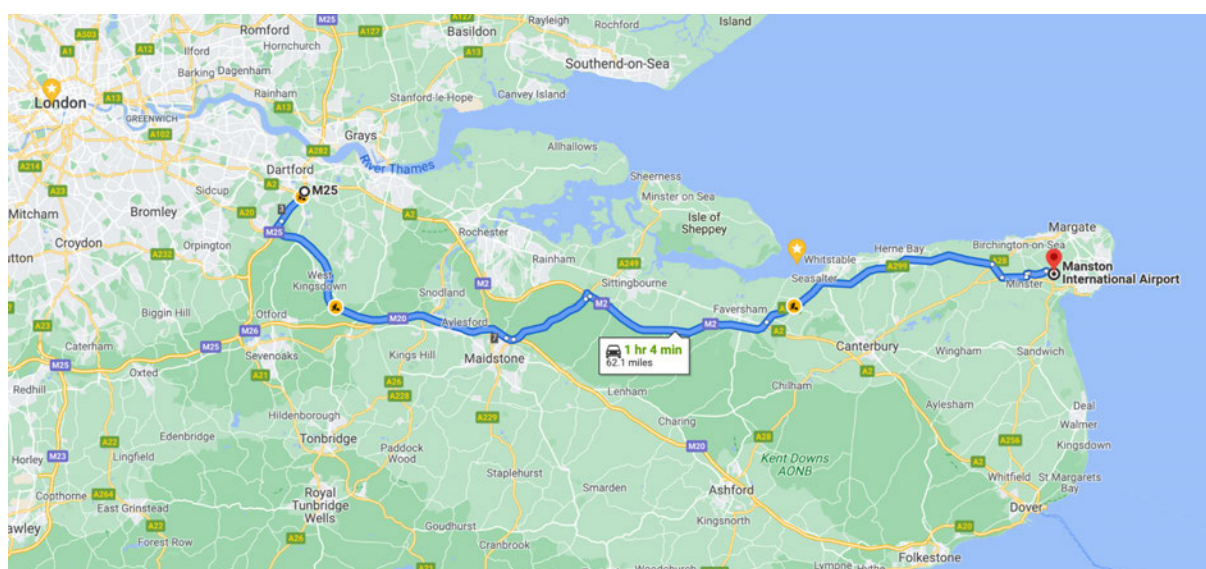
³⁹ **Runway Capacity to Serve the South East (RUCATSE)** report for the Department of Transport (1993), which concluded that Manston “*did not merit detailed assessment*”; **The Future Development of Air Transport in the UK South East (DfT, 2002)** which concluded with regards to Manston that “*key constraints are its geographic position in relation to the major sources of demand and noise impacts over the nearby town of Ramsgate*”; **Sir Howard Davies’ Airports Commission Interim Report (2013)** which reviewed the case for Manston as one of 52 proposals received in its shortlisting process and dismissed it as an option for further consideration in the final report since it “*did not fit with the Commission’s remit or offer a solution to the key question of providing additional long term capacity and connectivity for the UK*”; **Airports Commission Interim Report : The Air Freight Industry in the UK (PwC, 2013)** Of particular note is that Manston was rejected for any further consideration after being considered by the Airports Commission (“AC”) in context as a dedicated cargo only carrier in this report, which formed part of the AC’s suite of Economics Analysis Consultants Reports; **Airports Commission Final Report (2015)** After being duly and fairly considered as both a passenger airport and in PwCs accompanying economic analysis in the context of a freight only operator as per the Applicant’s current proposal Manston was deemed unworthy of even a single mention in the Airports Commission Final Report of 2015; and **Airports National Policy Statement (June 2018)** (“ANPS”) The ANPS confirms the significant role of the Airports Commission and its reports in establishing the evidence base for the ANPS and evaluating “*how any need for additional capacity should be met in the medium and long term*”. The ANPS confirms that the shortlisting process of the Airports Commission reviewed 52 proposals, which as evidenced above included Manston in its capacity as both a passenger airport and as a freight only operator, and concludes that: “*The Government believes that the Airports Commission has analysed all the options put forward to the appropriate degree of detail, and discounted shortlisted schemes fairly and objectively*”.

⁴⁰ [TR020002-003979]

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003979-Five10Twelve%20Ltd%20-%20DL6%20Comments%20on%20WS%20Need%20and%20Ops.pdf> (accessed 30 november 2021)

our submissions to the 2nd Consultation at SoS/R/012 (see Page 23 and Paragraph X); SoS/R/022 (see Pages 1-14); SoS/R/033 (see Pages 1-2))

- b. The Proposed Development is landlocked and not on the River Thames or by the sea (evidenced in our submissions to the 2nd Consultation at SoS/R/012 (see Pages 25-28 and Paragraph Y))
- c. The Proposed Development is not near a motorway (the M2 starts after Faversham over 30-45 minutes away⁴¹)
- d. The Proposed Development is not close to London or within London's orbital M25 motorway (it would take over an hour to reach the M25, please see map below⁴²).



48. Further, we respectfully remind the SMAa and the IAA that:

- a. The Proposed Development is not located within easy reach of a passenger train terminal (evidenced in our submissions to the 2nd Consultation at SoS/R/022 see Page 3; and SoS/R/012 see Pages 21-22).
- b. The potential for a direct passenger rail connection and passenger railway station at the Proposed Development site was investigated and rejected⁴³. The Proposed Development site's runway also presents a

⁴¹ Source Google map

⁴² Source Google map

⁴³ Page 10 Thanet Parkway Railway Station Alternative Options Analysis Report July 2014 Available

physical barrier to having a direct passenger rail line to the Terminal building. The passenger railway line would either need to be delivered around the runway or tunnelled under the runway at an unaffordable cost⁴⁴.

Chapter 5.2.2, Page 21 of IAAR [[Manston DRAFT Assessors Report](#)]

49. We strongly support the comments made within the submissions of [Ramsgate Town Council's independent aviation expert's report](#) and [Jenny Dawes' independent aviation expert's report](#).
50. We strongly support the conclusion reached at the top of Page 25 of the IAAR [[Manston DRAFT Assessors Report](#)].
51. Further, we strongly support the submissions to the 2nd Consultation of the Ramsgate Town Council, Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert.

Chapter 5.2.3, Page 25 of IAAR [[Manston DRAFT Assessors Report](#)]

52. We strongly support the comments made within the submissions of [Ramsgate Town Council's independent aviation expert's report](#) and [Jenny Dawes' independent aviation expert's report](#).
53. We strongly support the conclusion reached at the top of Page 26 of the IAAR [[Manston DRAFT Assessors Report](#)].
54. Further, we strongly support the submissions to the 2nd Consultation of the Ramsgate Town Council, Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert.

Chapter 5.2.4, Page 26 of IAAR [[Manston DRAFT Assessors Report](#)]

55. We strongly support the comments made within the submissions of [Ramsgate Town Council's independent aviation expert's report](#) and [Jenny Dawes' independent aviation expert's report](#).

online at:

[\[redacted\]](#) f (accessed 30 November 2021)

⁴⁴ Page 10 Thanet Parkway Railway Station Alternative Options Analysis Report July 2014 Available

[\[redacted\]](#) (accessed 30 November 2021)

56. We strongly support the conclusion reached at the top of Pages 28 and 29 of the IAAR [[Manston DRAFT Assessors Report](#)].
57. Further, we strongly support the submissions to the 2nd Consultation of the Ramsgate Town Council, Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert.

Chapter 5.2.5, Page 29 of IAAR [[Manston DRAFT Assessors Report](#)]

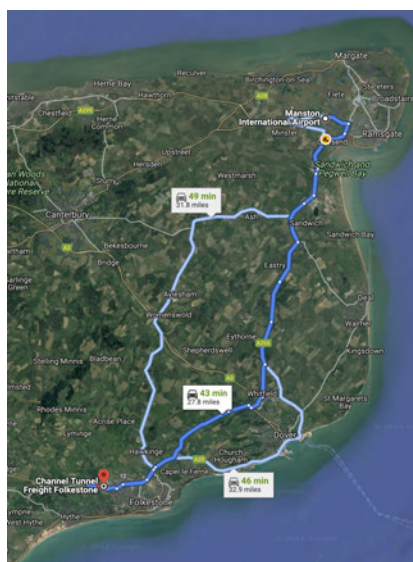
58. We strongly support the comments made within the submissions of [Ramsgate Town Council's independent aviation expert's report](#) and [Jenny Dawes' independent aviation expert's report](#).
59. We strongly support the conclusion reached at the top of Page 31 of the IAAR [[Manston DRAFT Assessors Report](#)].
60. Further, we strongly support the submissions to the 2nd Consultation of the Ramsgate Town Council, Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert.

Chapter 5.2.6, Page 31 of IAAR [[Manston DRAFT Assessors Report](#)] : Resilience

61. We strongly support the comments made within the submissions of [Ramsgate Town Council's independent aviation expert's report](#) and [Jenny Dawes' independent aviation expert's report](#).
62. We strongly support the conclusion reached at the top of Page 32 of the IAAR [[Manston DRAFT Assessors Report](#)].
63. Further, we strongly support the submissions to the 2nd Consultation of the Ramsgate Town Council, Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert.
64. We respectfully reiterate our conclusions and comments of Paragraphs 4-11 above that it is simply not possible to make any assumption as to the date of any potentially reopening. The Applicant has twice failed Step 2 of a seven step process with the Civil Aviation Authority ("CAA"), and the CAA has stated that a full indicative timeline for airspace cannot be confirmed.
65. We evidence in our submission to the 2nd Consultation SoS/R/033 that since 18 September 2021, a new cross-Channel rail freight service opened to all transporters, using an unaccompanied mode through the Channel Tunnel. The crossing is managed by Eurotunnel Le Shuttle Freight and operates 24 hours a day and six days per week. Departures are from the Group's two

terminals in Calais or Folkestone. The capacity will be 8,300 trailers per year. The Eurotunnel Border Pass allows transporters to speed up the border crossing by digitising their administrative exchanges with the border authorities⁴⁵.

66. The Channel Tunnel Freight Folkestone is some distance from the Proposed Development as shown below; however, the Eurotunnel Rail Freight services Kent, South East and the rest of England.



67. The new cross-Channel rail freight service is also not impacted by a shortage or otherwise of HGV drivers as it is unaccompanied.
68. This new rail service, which will emit 40 times less CO₂ than ferries, will enable customers to decarbonize their logistic chain by choosing rail. The modal shift also contributes to the French government's objectives of doubling the share of rail in freight transport by 2030 and to UK government plans to decarbonize freight set out in the Green Industrial Revolution plan⁴⁶. And the statutory duty set out in The Williams-Shapps Plan for Rail to promote rail freight to secure economic, environmental and social benefits to the nation.

Chapter 5.3.1, Page 33 of IAAR [Manston DRAFT Assessors Report] : Heathrow

⁴⁵

accessed on 12 November 2021)

⁴⁶

(accessed 24 November 2021)

Airport

69. We strongly support the comments made within the submissions of [Ramsgate Town Council's independent aviation expert's report](#) and [Jenny Dawes' independent aviation expert's report](#).
70. We strongly support the conclusion reached at the bottom of Page 34 and top of Page 35 of the IAAR [[Manston DRAFT Assessors Report](#)].
71. Further, we strongly support the submissions to the 2nd Consultation of the Ramsgate Town Council, Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert.
72. Further, we respectfully remind the Secretary of State that at the Transport Committee on 21 September 2021 in response to a question from the Chair as to whether [Heathrow was] still looking at a third runway for Heathrow?

John Holland-Kaye (Chief Executive Officer, Heathrow Airport) responded:

*"Yes, absolutely. It is not just for Heathrow; **it is for the UK**. If we want to provide the benefits we have talked about, **connecting all of Britain to global growth, providing the capacity for cargo** as well as for passengers—we need **an expanded hub airport**. That is the only way we can take the battle to Paris, Frankfurt and Schiphol. **Parliament voted for that** a few years ago. We have paused that, of course, during the pandemic but **we will be getting back onto that as soon as we can**"⁴⁷ (bold added for emphasis).*

73. Clearly the case for Heathrow expansion is supported by Parliament at the ANPS and for the UK's global positioning.

Chapter 5.3.2, Page 15 of IAAR [[Manston DRAFT Assessors Report](#)] : Stansted Airport

74. We strongly support the comments made within the submissions of [Ramsgate Town Council's independent aviation expert's report](#) and [Jenny Dawes' independent aviation expert's report](#).
75. We strongly support the conclusion reached at the middle of Page 37 of the

⁴⁷ Q55 Transport Select Committee Oral evidence: Airlines and airports: supporting recovery of the UK aviation sector, HC 683 Tuesday 21 September 2021 Ordered by the House of Commons to be published on 21 September 2021. Available online at:

(accessed 30 November 2021)

IAAR [[Manston DRAFT Assessors Report](#)].

76. Further, we strongly support the submissions to the 2nd Consultation of the Ramsgate Town Council, Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert

Chapter 5.3.3, Page 37 of IAAR [[Manston DRAFT Assessors Report](#)] : East Midlands Airport

77. We strongly support the comments made within the submissions of [Ramsgate Town Council's independent aviation expert's report](#) and [Jenny Dawes' independent aviation expert's report](#).
78. We strongly support the conclusion reached at the middle of Page 38 of the IAAR [[Manston DRAFT Assessors Report](#)].
79. Further, we strongly support the submissions to the 2nd Consultation of the Ramsgate Town Council, Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert.
80. In September this year, UPS opened its expanded air hub at East Midlands Airport (EMA) in the UK, doubling its capacity at the airport. The facility also features automated scanning and sortation systems and the project came at a cost of £138m.
81. The airport is home to UPS's largest UK air gateway and its second largest air operation in Europe after its Europe Hub in Cologne, Germany⁴⁸. For UPS to invest over £100 million in EMA it must know that there are facilities available for cargo flights and available aircraft stands.
82. According to the MAG website for East Midlands Cargo there is "*ample room to grow the airports thriving cargo facilities are expanding to meet the demands of importers and exporters from across the UK. Able to [accommodate] the largest freight and passenger aircraft, EMA supports a vibrant cargo logistics operation 24/7*⁴⁹".

Chapter 5.3.3: Other South East Airports : Gatwick Airport and Southend Airport and Luton London Airport

⁴⁸

(accessed 30 November 2021)

⁴⁹ (accessed 30 November 2021)

83. We respectfully submit that Luton London Airport (which handles 28,000 tonnes of cargo a year⁵⁰); and London Southend Airport (announced a new partnership with a major worldwide logistics operator (Amazon)⁵¹) are all in the South East.
84. We respectfully submit new evidence that London Gatwick (currently at 150,000 tonnes a year has plans to double it to 350,000 tonnes a year with the use of the Northern Runway⁵²). London Gatwick is also in the South East.

Chapter 5.3.4, Page 38 of IAAR [[Manston DRAFT Assessors Report](#)] : Other Issues

85. We strongly support the conclusion reached at the top of Page 39 of the IAAR [[Manston DRAFT Assessors Report](#)].
86. Further, we strongly support the submissions to the 2nd Consultation of Jenny Dawes' Independent Aviation Expert.
87. As identified by the IAA the need case must rest on *cargo* demand.
88. In any event, as you will be aware, the South-East is a resilient General Aviation region (evidenced in our submissions to the 2nd Consultation at SoS/R/023). In addition, there are a number of places that offer GA and/or light aircraft services and facilities specifically in East Kent and in Kent (evidenced in our submissions to the 2nd Consultation at SoS/R/023).

Chapter 5.4, Page 39 of IAAR [[Manston DRAFT Assessors Report](#)] : Locational Requirements of Air Freight

89. We strongly support the comments made within the submissions of [Ramsgate Town Council's independent aviation expert's report](#) and [Jenny Dawes' independent aviation expert's report](#).
90. We strongly support the conclusion reached at the top of Page 40 of the IAAR [[Manston DRAFT Assessors Report](#)].
91. Further, we strongly support the submissions to the 2nd Consultation of the Ramsgate Town Council, Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert.

■ (accessed 21 November 2021)

⁵¹ *Ibid*

⁵² (accessed 21 November 2021)

92. We submit **new evidence by way of the Union Connectivity Review**⁵³ (“UCR”) published on 26 November 2021 that identifies transport corridors that [it] believes should be contained within this network [UKNET – a strategic transport network for the whole United Kingdom] and focuses specifically on those that are important for connectivity between the nations of the UK and where improvements to those would serve the UK better.
93. The UCR has identified what needs to be done for better Union connectivity and in relation to cargo/ freight: “*securing better connectivity for freight across the UK with ports, and freeports as they are established*”⁵⁴.
94. The Proposed Development is not a Freeport nor near a Freeport and falls out with this UCR recommendation for better Union connectivity. The current list of freeports is as follows: 1. East Midlands Airport; 2. Felixstowe & Harwich including the Port of Felixstowe and Harwich International Port; 3. Humber including parts of Port of Immingham; 4. Liverpool City Region including the Port of Liverpool; 5. Plymouth & South Devon including the Port of Plymouth; 6. Solent including the ports of Southampton, Portsmouth and Portsmouth International Port; 7. Thames including the ports at London Gateway and Tilbury; and 8. Teesside including Teesside International Airport, the Port of Middlesbrough and the Port of Hartlepool⁵⁵.
95. The UCR has identified the UKNET airports⁵⁶ as follows: Aberdeen • Belfast City • Belfast International • Birmingham • Bristol • Cardiff • Doncaster Sheffield • East Midlands • Edinburgh • Gatwick • Glasgow • Heathrow • Inverness • Liverpool (John Lennon) • London City • Luton • Manchester • Newcastle • Southampton • Stansted. The proposed Development has not been identified as a UKNET airport.
96. The UCR identified the following regions of regular regional freight flows: North Wales-North West England; and South Wales-Greater Bristol Area⁵⁷.

⁵³ Union Connectivity Review published 26 November 2021 Available online at:

[REDACTED] (accessed 30 November 2021)

⁵⁴ Page 5

[REDACTED] (accessed 30 November 2021)

[REDACTED] (accessed 30 November 2021)

⁵⁶ Page 29 Union Connectivity Review published 26 November 2021 Available online at:

[REDACTED] (accessed 30 November 2021)

⁵⁷ *Ibid*

These areas are nowhere near the Proposed Development.

97. The UCR identifies Freight Hubs and in particular focusing on freight connectivity as an essential part of the successful operation⁵⁸.
98. In our submission to the 2nd Consultation at SoS/R/022 we evidence at Pages 7-14 that the Proposed Development does not have rail freight connectivity; specifically it is not near a rail freight terminal or route.
99. In addition, we refer the Secretary of State to our submission to the First Round of Consultation at [\[TR020002-005665-006\]](#) and due to there being:
 - a. No Strategic Rail Freight Interchange (“**SRFI**”) nearby the Proposed Development; and
 - b. No plans to develop an SRFI within the 30 year lifespan of the Transport Strategy for the South East or the 10 year lifespan of the Kent Rail Strategy; and
 - c. No rail freight terminal or route near the Proposed Development.

Therefore the Proposed Development cannot change its lack of rail freight connectivity. This will negatively impact its success.

100. The UCR identifies the Midlands as a Freight Hub and home to a particularly high density of national distribution centres known as the ‘Golden Triangle’. Located between Nottingham, Bedford and Birmingham it is the UK’s primary distribution hub⁵⁹ because of its relatively central location and the Channel Tunnel as another vitally important freight connection with almost 1.6 million freight vehicles using this link to cross between the UK and France in 2019⁶⁰.
101. The map below shows the UCR’s **UKNET – a strategic transport network for the whole United Kingdom**⁶¹.
102. The Proposed Development is not identified as part of UKNET. Further, the region the Proposed Development is located in has not been identified as a

⁵⁸ Page 30 Union Connectivity Review published 26 November 2021 Available online at:

[REDACTED] (accessed 30 November 2021)

⁵⁹ Page 30 Union Connectivity Review published 26 November 2021 Available online at:

[REDACTED] (accessed 30 November 2021)

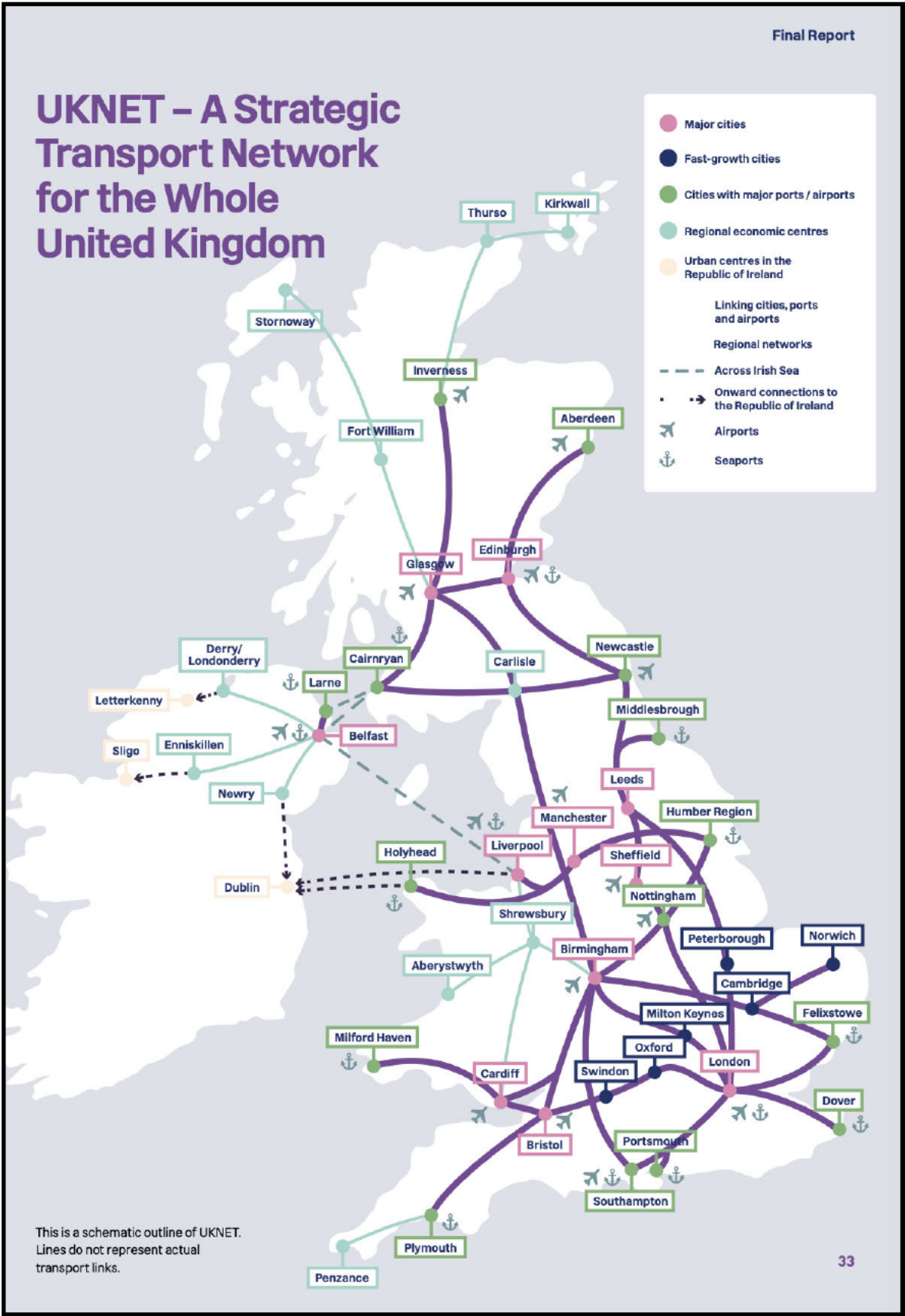
⁶⁰ Page 30 Union Connectivity Review published 26 November 2021 Available online at:

[REDACTED] (accessed 30 November 2021)

⁶¹ Page 33 Union Connectivity Review published 26 November 2021 Available online at:

[REDACTED] ccessed 30 November 2021)

major city, fast-growth city or a regional economic centre.



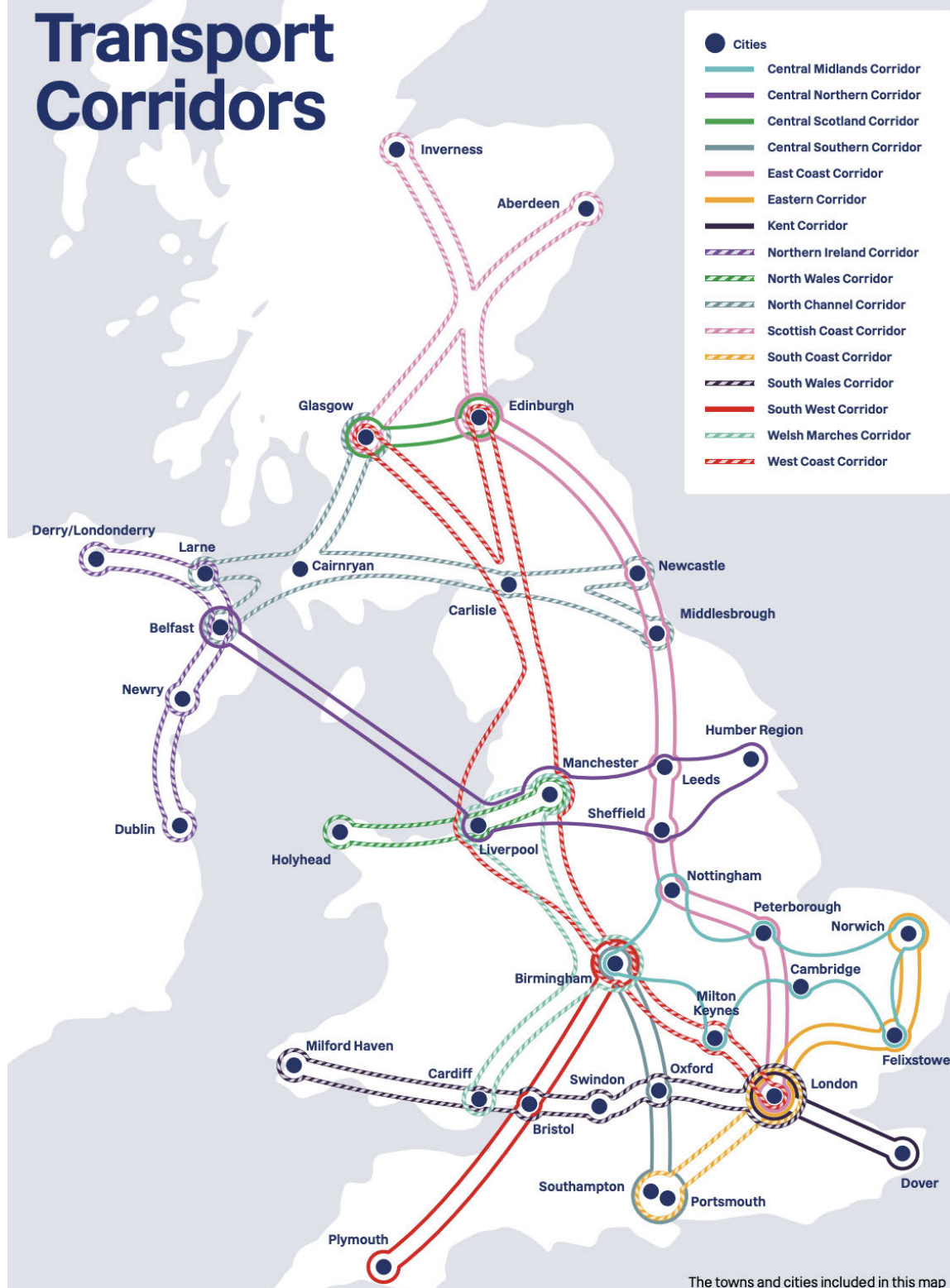
103. The UCR having recommended the proposed UKNET has identified the key transport corridors that it believes it should comprise⁶². These multimodal corridors connect key strategic points and have been developed using an assessment of baseline transport and population data, input from stakeholders and responses to the call for evidence⁶³. They are therefore robust indicators of demand and/or need. The Transport Corridors map is shown below and does not identify the Proposed Development.

⁶² Page 34 Union Connectivity Review published 26 November 2021 Available online at:

[REDACTED] (accessed 30 November 2021)

⁶³ *Ibid*

Transport Corridors



The towns and cities included in this map illustrate some, but not all, of the key population centres in each corridor.

104. The West Coast corridor has been identified as a key freight corridor supporting rail freight and HGV movements to and from major seaports and airports and the large logistics centres in the Midlands and onward to Northern Ireland⁶⁴.
105. The Kent Transport Corridor is between Dover and London. Dover is typically 40-55 minutes by car via the A256 from the Proposed Development. Road access is the only route.
106. The UCR stresses the importance of freight connectivity. It concludes on Page 80 that it has already identified a series of infrastructure improvements that will support the development of road and rail freight on the proposed UKNET (these are nowhere near the Proposed Development).
107. As identified above at Paragraphs 98 and 99 the Proposed Development does not have rail freight connectivity and due to its location it cannot change its lack of rail freight connectivity. It has poor road connectivity relying on mostly A roads.

Chapter 6, Page 41 of IAAR [[Manston DRAFT Assessors Report](#)]

108. We strongly support the submissions of 4 independent experts since the Examination that agree there is **no need for the Proposed Development** as evidenced in:
- a. [ExA recommendation Report.](#)
 - b. [Independent Aviation Assessor Report](#)
 - c. [Ramsgate Town Council's independent aviation expert's report](#)
 - d. [Jenny Dawes' independent aviation expert's report](#)
109. Further, we strongly support the submissions to the 2nd Consultation of the Ramsgate Town Council, Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert.

⁶⁴ Page 39 Union Connectivity Review published 26 November 2021 Available online at:

(accessed 30 November 2021)