

3.12.21

[Manstonairport@planninginspectorate.gov.uk](mailto:Manstonairport@planninginspectorate.gov.uk) – by email

Dear Planning Inspectorate

I am writing to object in the strongest possible terms to the fact that the Secretary of State remains determined to continue consideration of the Manston Airport Development Consent Order and requests for submissions from Interested Parties.

This scheme should have been refused long ago, as your own Enquiry in 2019 and no less than **fifteen** other independent reports have recommended. Yet somehow the plan refuses to die, and more and yet more chances are given for someone, somewhere to come up with a reason why the SoS should approve it.

This casts doubt on the fair decision-making and evidence-based policy development on which we should be able to rely. RSP Ltd have had unparalleled access to MPs via their sponsorship of the APPG for Aviation. Our two MPs support RSP's proposals: one owns an airline; the other describes himself proudly as 'the MP for RiverOak', despite expressing concern about the impact of Heathrow expansion on the health of his grandson in West London. The Secretary of State is a plane owner and an avowed airport enthusiast. Transport Minister Stephenson represents a constituency where Rolls Royce is a major employer. Surely we should be relying on the unbiased, impartial assessment of the Planning Inspectorate's own 2019 Enquiry and the subsequent Ove Arup report which echoed its conclusions, rather than the views of individual Ministers?

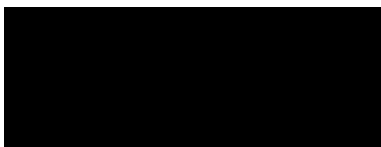
The RSP scheme is unrealistic, inappropriate, ill thought-out and potentially damaging. I have very little time so will simply outline a few of the reasons why it should be refused:

- ❖ It is **in the wrong place**. To quote Richard Burnett, CEO of the Road Haulage Association, *"Manston Airport is... a completely unsuitable location (for Operation Stack) as the road network in that part of Kent is not geared up to accommodating hundreds of HGVs"*. Yet thousands of HGVs would be needed to transport goods from RSP's proposed cargo hub. The Davies Commission did not consider Manston as an overspill airport for London for precisely this reason.
- ❖ Far from supporting it, it will **adversely affect the local economy**. Thanet's growth area is tourism. The noise, pollution, traffic disruption and nuisance from cargo planes flying low over Thanet every 12 minutes will destroy the area's burgeoning tourist economy.
- ❖ It will **devastate the historic town of Ramsgate**. RSP's own documentation speaks of 'significant adverse effects' on this beautiful old seaside town, which has just been awarded £20m of Levelling Up Fund monies to develop green jobs & training.
- ❖ It **runs counter to the Government's own 'best use' policy** which requires maximum benefit to be extracted from existing facilities. The new runway at Heathrow and

new UPS warehouse at EMA will build capacity at both of these existing airports, which should be assessed for adequacy before any new build is considered.

- ❖ Its **carbon emissions are already accounted for elsewhere**. The scheme will require 2% of UK aviation carbon emissions, which are already implicitly allocated to other airports with extant planning permission. The carbon budget is not elastic.
- ❖ Its **claims to be carbon neutral within 5 years are nonsensical**. The only part of the airport that can be carbon neutral is the buildings. The planes and the massive number of road haulage vehicles that will be needed to truck goods to the rest of the country (and fuel to the airport as there is no pipeline) will not be: indeed, all of these will increase carbon emissions and exacerbate air and noise pollution.
- ❖ Its **electric plane plans are greatly premature**. RSP leaders advised Thanet District Councillors recently that electric planes would be flying from the airport imminently. But industry reports suggest 2050 as the earliest date for viable electric aviation, and comment: *"There are few commercially scalable options for 'decarbonising' aircraft in the near future."* (Aviation Environment Federation: [REDACTED])
- ❖ It will **limit national progress towards net zero**. The Secretary of State said in his speech at COP26: *"I'm proud to be uniting world leaders to tackle climate change, creating new opportunities for clean growth, green jobs, and improved air quality right across the globe."* Yet if his Department approves a DCO for a new airport, we will be taking a clear step back on this commitment.
- ❖ There are **doubts about the applicants' financial position**. The BBC comments: *"Manston Airport in Kent would need hundreds of millions of pounds of investment and political support at national level to stand a chance of operating successfully, a report says. The Thanet Council document was put together by consultants hired to look at the viability of reopening it. The report suggests a 20-year business plan would be needed to rebuild confidence in the airport. It adds there are 'never any guarantees of success'."* Yet RSP has been reluctant to say anything about its investors and delayed paying out funds they owe on several occasions, raising doubts about their capacity to manage large-scale investment.
- ❖ RSP's plan is simply **not viable**. It relies on taking business from much bigger, more established players, to revive an airport that has failed as a commercial venture 3 times, is badly situated, has poor transport links and has no proper business plan. PINS (2019) concludes: *"Manston appears to offer no obvious advantages to outweigh the strong competition that such airports offer...."*

I hope the Department for Transport will now put us all out of our misery and refuse this speculative DCO application once and for all.



Patricia Austin