



The Rt Hon Grant Shapps
The Secretary of State for Transport
Department for Transport
London
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BY EMAIL: transportandworksact@dft.gov.uk

Dear Sir

**RiverOak Strategic Partners
Proposed Manston Airport Development
Development Consent Order (“DCO”)
New Evidence since the Close of the Secretary of State’s First Consultation**

As you will be aware on 6 September 2021 the DfT ruled out an Airports National Policy Statement review¹ (“**ANPS Review Letter**”). We respectfully draw your attention to the last paragraph of Page 4 of the ANPS Review Letter titled the Cumulative impact of growth at other airports.

At the start of the said paragraph the Secretary of State states:

“The Secretary of State does consider the impact of other airport growth proposals to be a significant change in circumstances on the basis of which policy set out in the ANPS was decided. However, the growth of other airports was foreseen” (underline added for emphasis)

The [MBU Forecast](#)² **did not** include Manston Airport, since it had been closed for 4 years at the time of the MBU with a proposal from the landowners to develop the site for housing³. The growth of an airport at Manston was therefore **unforeseen**.

¹ Available online
at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015207/decision-on-requests-to-review-the-anps.pdf (accessed 11 September 2021)

² The Future of UK Aviation: Making Best Use of Existing Runways (“**MBU**”), was developed with a DfT aviation model to look at the impact on carbon emissions and to ensure compatibility with the UK’s climate change commitments. This MBU Forecast for United Kingdom (UK) airports (the “**MBU Forecast**”), covered a central demand scenario that included LHR NWR. Department for Transport Disclosures to SSE Freedom of Information Request on Forecasts Projections. Available online at:



(accessed 11 September 2021)

³ Available online at:  (accessed 11 September 2021)

Conclusion:

The mitigation of foreseen regional airport growth which the Secretary of State has specified against the significant change in circumstances on the basis of which policy set out in the Airports National Policy Statement (“**ANPS**”) was decided clearly does not apply in the case of Manston Airport.

It follows, therefore, that in the event that the DCO is granted, any prospective growth (from a non-operational baseline - i.e. zero ATMs), at Manston Airport would constitute a significant change in circumstances on the basis of which policy set out in the ANPS was decided and would therefore put the ANPS, and/or the MBU at risk of further challenge.