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**Dr Philip Shotton**



6th February 2019

Examining Authority  
Planning Inspectorate  
TR020002 - Manston Airport Project

Re: **Deadline 2 Submission**

Dear Sirs,

I am writing to you with my comments to the submissions made by Deadline 1 by the applicant.

My comments relate to:

1. Inadequate information provided by the Applicant regarding funding
2. Inability to demonstrate a project of National Significance
3. Use of informal and biased surveys to claim public support
4. Failure of Thanet's 2 MPs to represent their constituents' interests

### **1. Inadequate Funding Information**

PINS has already commented that the lack of detail and clarity in the funding statement is a significant financial risk to the examination of the project (Section 51 letter from PINS dated 14th August 2018). Your section 6 letter, Appendix B, provides a number of items requiring clarification from the Applicant. The Applicant's response suggests that the funding information requested will not be available until Deadline 3. This is completely unacceptable. This startup has known for a significant amount of time that assessment of funding would be a key step in the process. Indeed members of the Applicant's team have been through this before, with failed applications for a CPO for Manston that were rejected by Thanet District Council due to lack of evidence of funding. It stretches credibility to believe that a group of people who claim to be able to manage an infrastructure project of national significance cannot comply with requirements that would be obvious to any competent applicant. Surely their failure to comply mandates that the application be rejected before completion of examination.

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## **2. Project of National Significance**

The applicant has thus far completely failed to show why this project should be regarded as one of national significance. There is no stated requirement for an increase in dedicated air freight capacity in any government planning documents, no statement that there is any shortfall in such capacity in the South East of the country, and no evidence of need. The Applicant's projections of air-freight increase are unrealistic, contradict aviation specialists reports including those that they reference as supporting their application, and their plans would require capture of around 50% of the UK's existing freight capacity - despite the adequacy of existing operators' infrastructure and capacity. Hardly a credible business plan! I believe this project should never have been accepted as a Nationally Significant Infrastructure Project and the continuing failure of the Applicant to demonstrate this status should render the examination a waste of time and public funds.

## **3. Biased Surveys**

The Applicant and their supporters frequently claim that the majority of Thanet residents are in favour of reopening the airport. Given that there has been no independently and impartially run polling of the electorate in ANY form that questions the residents about reopening as a cargo hub with significant night flight activity, any such claims must be ignored. The claimed support comes from Facebook and other social media surveys with no adequate controls or oversight. The only survey to ask the question of the residents indicated that 89% were against night flights from Manston Airport (1). However airport supporters continue to claim widespread support.

## **4. Failure of Thanet's MPs to represent their Constituents' interests**

North Thanet MP Sir Roger Gale and South Thanet MP Craig Mackinlay have both heavily vocalised their support for reopening Manston Airport, despite the vast majority of their constituents being opposed (see above). Both have a conflict of interest; [REDACTED] (widely known locally as MP for RiverOak) is Chair of the All Party Group for General Aviation, whose mission is to increase aviation activity (2). And [REDACTED] owns an airline based at Manston (which incidentally he failed to register (3)).

I confess I am at a loss to understand how or why the application has proceeded this far, and indeed why the Applicant believes they have any reasonable prospect of success in their application or their future running of an airport project. My own view is that the only realistic prospect of commercial success for Manston Airport is as a housing development - as indeed the current owners have already proposed with much more credibility.

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I can only assume that any investors brought on board by the Applicant will have this as their long-term strategic plan, once the land has been forcibly removed from its rightful owners. Given the opacity of investors information from the Applicant it would not surprise me at all to learn that our MPs have a financial interest in the successful outcome of this application.

Thank you for the opportunity of presenting my comments regarding the initial process. I will also be submitting representation in advance of Deadline 3.

Yours sincerely,

Dr Philip Shotton  
Concerned Ramsgate resident.

Citations (attached with this document)

- (1) Manston Airport night flights opposed by Thanet District Council.pdf.
- (2) House of Commons - General Aviation Group as at 28 September 2017.pdf
- (3) Kent MP Craig Mackinlay rebuked by standards watchdog.pdf

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# Kent MP Craig Mackinlay rebuked by standards watchdog

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NEWS ALERTS 📧  
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By Paul Francis [pfrancis@thekmgroup.co.uk](mailto:pfrancis@thekmgroup.co.uk) (<mailto:pfrancis@thekmgroup.co.uk>)

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12:22, 15 June 2018 | **Updated:** 08:30, 18 June 2018



South Thanet MP Craig Mackinlay has been rebuked by a standards watchdog over his failure to register his involvement in an airline after becoming an MP.

The Parliamentary commissioner said he had been in breach of rules that any shareholding over 15% in a company, or if that shareholding is under 15% but has a value of more than £70,000, needed to be registered as a financial interest.

The complaint relates to non-disclosure of a company, Mama Airlines Limited and whether it was relevant to disclose during proceedings regarding the Manston airport site.



Craig Mackinlay at Ramsgate harbour (1258233)

Mr Mackinlay has apologised for the omission but says the company had never traded and was dormant. He also said the rules should be changed for such companies.

The company was founded by the MP when there was interest in Manston being used for a service to Malaga but never 'got off the ground', with the events of 9/11 preventing any further progress or interest.

The MP said he had never made any money from the company.

"Despite its name, the dormant company is no more an airline than it is a sweet shop," he said.

How Manston airport looked before it closed. Picture: Tony Flashman

In a statement, he said: "Not in my wildest dreams did I think, through any common-sense interpretation of the rules, that a dormant company, a mere incorporation of an idea some 17 years old would require registration."

He added the rules governing when MPs should disclose interests in such companies were perverse.

"If a member has a shareholding of under 15% in a company and it is worth £69,999, quite perversely in my view, it does not require registration. I have made suggestions as part of the closure of this investigation that a sensible de-minimis should be incorporated into any new rules



...I am sure they were never intended to encompass such an insignificant shareholding in a company that has never traded."

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(http://www.kentonline.co.uk/kmtv/)



"I will continue speak up for an aviation future for Manston as much as I am able, not least as, despite the passage of time, it is an industry that I understand and have, albeit historic, knowledge of."

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## Register Of All-Party Parliamentary Groups [as at 28 September 2017]

### General Aviation

<b>Title</b>	All-Party Parliamentary Group on General Aviation
<b>Purpose</b>	To promote the objective - as set out by the British Government - of making the UK the best country in the world for General Aviation through inspiring both current and future generations to take up science, technology, engineering and mathematics, thereby creating high-tech jobs and growth in our economy.
<b>Category</b>	Subject Group

Officers		
Role	Name	Party
Chair & Registered Contact	Grant Shapps	Conservative
President	Sir Roger Gale	Conservative
Treasurer	Kelly Tolhurst	Conservative
Vice Chair	Christian Matheson	Labour
Vice Chair	Bill Grant	Conservative
Vice Chair	Luke Pollard	Labour (Co-op)
Vice Chair	Ian Paisley	Democratic Unionist Party
Vice Chair	Glyn Davies	Conservative
Vice Chair	Iain Stewart	Conservative
Vice Chair	Lord Balfe	Conservative
Vice Chair	Lord Rotherwick	Conservative
Vice Chair	Lord Stevens of Kirkwhelpington	Crossbench
Vice Chair	James Duddridge	Conservative

Contact Details
<p><b>Registered Contact:</b> Grant Shapps MP, House of Commons, London, SW1A 0AA. Tel: 020 7219 8497. Email: <a href="mailto:shappsg@parliament.uk">shappsg@parliament.uk</a>.</p> <p><b>Public Enquiry Point:</b> Matthew Bolshaw, Hayward Aviation Ltd, Chipperfield, Back Lane, Letchmore Heath, Hertfordshire WD25 8EJ. Email: <span style="background-color: black; color: black;">[REDACTED]</span></p> <p><b>Group's Website:</b> <a href="http://www.generalaviationappg.uk/">http://www.generalaviationappg.uk/</a></p>

Annual General Meeting	
Date of most recent AGM in this Parliament	28/06/2017
Did the group publish an income and expenditure statement relating to the AGM above?	No
Reporting year	28 Jun to 27 Jun
Next reporting deadline	28/10/2018

Registrable benefits received by the group			
Financial Benefits			
Source	Value £s	Received	Registered
JLT Management	3,000	04/09/2017	15/09/2017

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# Manston Airport night flights opposed by Thanet District Council

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By Danny Boyle [dboyle@thekmgroup.co.uk](mailto:dboyle@thekmgroup.co.uk) (<mailto:dboyle@thekmgroup.co.uk>)

13:45, 11 May 2012 | **Updated:** 13:54, 11 May 2012





Kent International Airport, Manston

## **Scheduled night flights have been suggested for Manston Airport**

by Julia Collins

Proposals for night-time flights at Manston Airport will not be supported by Thanet District Council.

At a meeting last night, cabinet members recommended the council reject the introduction of limited night-time flying.

Scheduled night flights had been suggested at the airport to help increase air capacity.

But councillors decided the proposed scheduled flights would be too noisy and have too great an environmental impact.

Carole Russell, of the No Night Flights protest group, said: "We're very pleased with this result. We've been fighting against these proposals for two years.

"Now we feel as if it is all going the way of the public's vote on the consultation and that things are going well.

"We have no problem with the airport expanding and increasing daytime flights, but night flights would be too disruptive for local residents and be detrimental to health."

Another member of the group, Steve Higgins, is also delighted.

He said: "This is great news for Ramsgate, not just those in the flight path but for the town as a whole."

Thanet District council leader Cllr Clive Hart said: "Our public consultation clearly demonstrated that a large number of residents were against the introduction of night-time flying.

"Having considered the views of local people, the findings of our independent assessment and the proposals themselves, it is clear what our recommendation to council had to be.

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by adding your  
comments below...**

What do you think? Join the debate by adding your comments below

"We are however, fully supportive of the airport. Encouraging regeneration in Thanet and supporting local businesses is vital to the success of the area, but this can't come at any cost."

Cabinet members were considering the council's draft consultation response to Manston Airport, which will now go to full council for final debate on Thursday, May 24.

Manston Airport chief executive Charles Buchanan said: "I have been assured by the leader of Thanet District Council that the local authority recognises the airport as 'an economic asset to Thanet'.

"However, I have pointed out that this stated position is fundamentally at odds with the decision taken by the cabinet to not support any night flying operations at Manston."

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### Magic Heater Takes US By Storm. The Idea Is Genius



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