

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 13 and Rule 16

Application by RiverOak Strategic Partners Ltd for an Order Granting Development Consent for the upgrade and reopening of Manston Airport

CPRE Kent reference: 20014525

Response to Examining Authority's written questions and requests for information (ExQ1)

Dear sirs,

We wish to offer the following comments in response to the written questions issued in 18th January.

ExQ1 F.1.16	<p>Cost efficiency and sustainability:</p> <p>The Planning Statement [APP-080] states in paragraph 6.47 , with reference to the Airports NPS, that: <i>"Paragraph 4.39 states that the applicant should demonstrate in its application that its scheme is cost efficient and sustainable, and seeks to minimise costs to airlines, passengers and freight owners over its lifetime. Whilst this is relevant primarily to the Heathrow Northwest Runway, RiverOak have set out the relevant details applicable to their scheme in the Funding Statement provided with the DCO."</i></p> <p>Show where and in what ways the Funding Statement [APP- 013] demonstrate the proposed scheme is cost efficient and sustainable, and seeks to minimise costs to airlines, passengers and freight owners over its lifetime.</p>
<p>CPRE Kent response:</p> <p>We support the constructive re-use of this site to support the local economy. However we retain significant doubts over the economic viability of the operations proposed for this site, and therefore the net benefits of this development to the economy may well be greatly overstated. We have seen no apparent</p> <p>Viability is a significant element of sustainable development. NPPF (2018) Para 8a requires the planning system to ensure that the economic objective is shown to be <i>"strong, responsive and competitive ... supporting growth, innovation and improved productivity"</i>, while also meeting social and environmental objectives.</p> <p>The viability of airfreight operations is dependent upon a high average load factor. This means that out-going freight arriving at the airport will usually need to be consolidated to achieve an economic load. Air freight by its nature is generally urgent and needs to be carried as soon as possible. There is a fundamental incompatibility between sending freight on the first possible flight and having to accumulate sufficient consignments to make a viable load for a freighter. Manston, with its limited catchment area, seems an unlikely location to attract sufficient out-going freight.</p>	

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

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Passenger services can offer greater flexibility with regard to out-going belly-hold freight, since their viability principally depends on passenger numbers; however we note that such services are not expected to be significant, particularly in the early years of proposed operation.

We recognise the uncertainty over traffic growth projections for freight and seek to ensure that the overall planning balance of these proposals do not result in negative social and environmental impacts at the expense of fragile forecasts of economic and employment benefits.

ExQ1 CC1.1	UK Climate Projections <ul style="list-style-type: none">• Provide an assessment of how this next generation of UK climate projections would affect the conclusions of Chapter 16 of the ES [APP-034].
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CPRE Kent response:

We very much welcome the addition of climate change as a discrete principal issue in this inquiry.

We still await the advice of the Committee on Climate Change on the specific implications for the aviation industry of the ratification of the Paris Agreement, but note that the SoS for Transport has acknowledged that UK aviation emissions in 2050 should be at their 2005 level (i.e. 37.5 MtCO₂e) ¹. The CCC further notes that achieving aviation emissions at or below 2005 levels by 2050 means that demand cannot continue to grow unfettered over the long term. We would welcome discussion at the inquiry on how the applicant plans to operate within these national commitments.

ExQ1 AQ.1.1	Air quality (<i>PHE have recommended that the applicant must demonstrate compliance with EU limits for NO₂ concentrations</i>)
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CPRE Kent response:

The recent UNICEF report '*A Breath of Toxic Air*'² highlights the particular impacts of air pollution on children. Other recent reports³ show the action needed to address this harm. In the light of the current and rapidly increasing awareness of the urgency of this issue, we consider that no increase in air pollution can be condoned until there is effective monitoring and control in place; at present, the nearest recording monitor is in Canterbury which is wholly inadequate. We welcome the applicant's response to this query.

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