

I write to comment on a report by Altitude submitted by owners of the airport site in their evidence, please see two relevant exerts below. There is clear evidence here that RSP using their close associate Sally Dixon of Azimuth have sought to manipulate cargo tonnage per ATM to ensure their scheme meets the requirement to provide 10,000 additional ATMs.

The total tonnage predicted by RSP is 340,000. Based on historical tonnes per ATM at Manston airport historically of 63 tonnes this would give ATMs of just under 5,400 ATMs, it would therefore not qualify as a NSIP. In order to ensure it does qualify Azimuth have reduced the per ATM tonnage to 18-20 tonnes to give ATMs of 17,000.

This is a clear manipulation of the data and on its own should mean that the scheme is rejected.

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- 364. The tonnes per ATM forecast figure (ca. 17-20 tonnes) is very low compared to historic levels at Manston. In the last full 5 years of operation, the airport recorded an average of 63 tonnes per cargo ATM.
  - The low figure is driven by an assumption that the most predominant cargo aircraft at Manston will be smaller Code C and Code D aircraft. We understand that this differs to the historic pattern, explaining the difference in average loads.
  - The projected average load is slightly above current Stansted levels. However, given the lack of
    integrator operations at Manston, we would have expected the average load figure to be higher.
  - As an illustration, if the average load in Year 20 was consistent with historic levels, the same forecast freight tonnage (340,000 tonnes) could be handled by ca. 5,400 cargo flights.



