

## **Ros McIntyre - Interested Party 20014158**

### **Written summary of oral submission to the ISH on Need – 21<sup>st</sup> March 2019**

#### **Explanation for this written “summary”**

I had understood that, as I would be speaking for No Night Flights, I would be able to speak for six minutes and I prepared on that basis. On the morning I was told I had three minutes and so I had to rewrite on the fly.

This written submission therefore contains the following:

- my best approximation of what I actually said
- the written version of what I had intended to say (subtracting the things that I did actually say)
- references to sources referred to.

#### **My best approximation of what I actually said**

My background for context:

- I work with senior management teams to determine strategy and business plans
- I've spent years assessing evidence as a Tribunal panel member and as an independent investigator
- I've been a director of several Special Purpose Vehicles.

I speak for No Night Flights.

Context for NNF – we've been around for ten years. The campaign group, Manston Airport Group, was around for the ten years before that – we inherited their experience, their files and their knowledge. Between us we have twenty years' experience and data about this airport; the players and the repeated strategy.

We don't hold ourselves out as aviation experts – we just work with the evidence. We do know a helluva lot about this particular airport.

There are some things I would like to pick up from today – we're seeing the same strategy repeated again and again. The first time we saw this was in 2001<sup>1</sup>. Tony Freudmann was a

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<sup>1</sup> “Manston Airport – a Strategy for Success” – 2001.

#### ***Cargo Traffic***

In parallel with growth in passenger traffic, LMA will continue its very successful efforts to attract more cargo traffic. At present, the Airport manages an annual throughput of some 35,000 tonnes. Once the addition of the new taxiway and apron is completed this autumn, the Airport will have the capacity to begin increasing tonnage to an annual rate of some 70,000 tonnes by 2002. Thereafter, the annual throughput of cargo is expected to rise to a figure of at least 200,000 tonnes by 2005 with the availability of additional warehousing and apron space.

member of that management team. The strategy put forward was that Manston would handle 350-400,000 tonnes of freight a year by 2015. It would do that by benefiting from growth in JIT manufacturing and in high tech sectors, and by benefiting from capacity constraints in South East airports. It would also take the cargo that was then being trucked to and from Europe.

That sounds very familiar to me.

Mr Freudmann said today that he was a “foot soldier” at the time. That’s not what it says in the minutes.<sup>2</sup> He says that it was “ludicrous” to suggest that Manston could have handled 200,000 tonnes of freight. Again, that’s not what he says in the minutes.

Mr Cain talked to you about BA World Cargo. We know about that. BAWC were at Stansted, not Heathrow as he said. The contract was up for renewal at Stansted so they had conversations with Manston. They needed 11 night flights every week. They got their offer from Manston. Stansted then dropped its price and BAWC stayed put.<sup>3</sup>

Mr Cain was also the author of the Infratil submission to the Airports Commission in 2013. That document sets out the fact that Manston, to be attractive to airlines using other airports, would need incentives for both passengers and freight – the report says that maybe something could be done with the Traffic Distribution Rules to help Manston to attract freight business<sup>4</sup>.

Osprey said that RSP would introduce a runway preference for ATMs when the tail wind was less than 5 knots and that this had never been tried before. That’s not true. The runway preference for landings and departures when the tail wind was less than 5 knots was in place from early 2001. That runway preference was reported on quarterly in the minutes.

We’re not aviation experts but we know an awful lot about this airport and it is tremendously frustrating to hear misrepresentation and the same strategy over and over again.

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Increasing use of international just-in-time delivery techniques, particularly in high tech growth sectors of the economy, suggests that demand may continue to grow at a similar level. In addition, there is evidence of UK-based companies trucking goods to and from continental airports. Freight traffic through Brussels, for instance, has grown considerably in recent years, a fact that likely reflects the pressure on capacity at the principal airports of southeast England. Indeed, both Heathrow and Gatwick have a presumption against dedicated freighter services operating at times of peak congestion. At both airports this now means most of the day. Also, there are indications that the proportion of freight carried in all-cargo flights will increase. Against that backdrop, and in the knowledge of the considerable interest being shown in LMA by established international cargo operators, LMA is confident of realising a potential for 350,000 to 400,000 tonnes a year by 2015.”

<sup>2</sup> In fact, he was the Managing Director of the airport

<sup>3</sup> BAWC did not reject Manston, as Mr Cain said, because of underinvestment in the airport

<sup>4</sup> I have submitted this report with my written summary of my oral submission to the Open Floor Hearing of 18<sup>th</sup> March 2019

## **What I had intended to say but had to cut**

We've now commented on three iterations of Dr Dixon's reports. NNF02, 06, 07 and 08 set out the many flaws in her case.

We know the DCO examination is a written process so I won't refer to the content of those submissions. However, I will say this. NNF's submissions are painstakingly researched and evidence-based. They don't rely on unpublished reports or theses as Dr Dixon does, but on easily obtained, publicly available data from reliable sources like the CAA and the DfT.

We have followed Dr Dixon's quotes and assertions back to her sources. She repeatedly misrepresents sources and makes assertions without evidence. Large parts of her work are unsubstantiated. In places, she is just plain wrong.

Her work cannot, and should not, be taken at face value.

Submission NNF13 speaks to the many flaws in her approach.

With no national policy statement supporting a new dedicated freight airport at Manston, the importance of Dr Dixon's work to this application can't be overstated. She is Azimuth Associates and RSP relies almost entirely on her work to make its case.

Dr Dixon is not independent. We've made submissions about her previous work with Mr Freudmann at Wiggins/Planestation. She advised on airport acquisitions and JVs and none succeeded. Her LinkedIn profile shows that her practical aviation experience is limited. By far the largest part is her experience with Manston at Planestation and now with RSP. Dr Dixon's experience and work stands against that of established and experienced aviation consultancies such as Falcon, Avia, York Aviation and Altitude Aviation.

RSP's case is a "build it and they will come" proposition. Dr Dixon relies on qualitative data to claim that RSP can develop a daytime dedicated freight business at Manston of 17,100 freight ATMs. This is frankly absurd. In a flat UK dedicated freight market, with no growth predicted and with spare capacity in freighters and at airports, she suggests that operators will swap cheap trucking of air freight for expensive dedicated freight ATMs to a peripheral airport and cheap belly hold freight to/from London airports for expensive freight ATMs to a peripheral airport. She provides no evidence of either.

Dedicated freight operators require night flights. We agree with York Aviation<sup>5</sup> that – once night ATMs and double counting for domestic ATMs is removed – there are fewer than 19,000 daytime UK dedicated freight ATMs. With no market growth and no proven appetite for product substitution by freight operators, Dr Dixon is

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<sup>5</sup> D4

effectively claiming that the entire UK daytime market for dedicated freight ATMs could transfer to Manston. This has no credibility. Even in boom years for UK dedicated air freight, Manston failed as a freight airport. 550 freight flights a year on average is a long way from the airport's capacity.

To close, I'll comment briefly on Northpoint Aviation's report for D4. We submitted a strong critique of Northpoint's previous work as part of the consultation - this report is no better. We'll submit a detailed written critique of it. The key point to make now is that the report is largely irrelevant to this DCO examination because:

- Its "Demand Capacity Modelling" explicitly ignores ATMs (the NSIP criterion) – it's in freight tonne kilometres, revenue tonne kms and tonnage
- It ignores price as a demand variable – so it's commercially unreliable
- It doesn't focus on dedicated freight, but lumps together bellyhold, freighter and "express"
- It echoes the Azimuth reports, claiming without evidence that trucked air freight could be converted to dedicated air freight.

The work presented by RSP to persuade the ExA that there is a need for a new dedicated freight airport and a compelling case in the public interest for this DCO cannot be taken at face value. If the ExA looks, as we have, behind the smokescreen of assertions, irrelevant metrics and partial quotations to available facts relevant to the UK, you'll see that RSP is long on assertions and short on evidence. The work of Dr Dixon and Northpoint fails to substantiate RSP's claims.