




Manston Airport Local Plan Representations - FINAL REPORT

Report for Thanet District Council

By AviaSolutions

August 2017



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Executive Summary

AviaSolutions has reviewed the Local Plan Representations that referred specifically to AviaSolutions' earlier report prepared for Thanet District Council "Commercial Viability of Manston Airport" (September 2016) that Thanet District Council is using as evidence in the Local Plan process.

AviaSolutions' opinion, based on updated market information since the publication of our previous study, is consistent with our earlier view that Manston Airport does not represent a financially viable investment opportunity under normal market conditions.

The objections raised through the Representations are similar across the eight documents under review and variously suggest that AviaSolutions' report did not fully consider the excess demand for air freight and passenger movements in the congested London airport system nor the full range of commercial opportunities available to the operator of Manston Airport. This argument is put forward alongside a range of counter-proposals for Manston Airport. However, it is evident that these counter proposals do not stand up against scrutiny on a variety of regulatory, commercial and financial aspects.

The Local Plan Representations do not make a credible case, nor provide the evidence for AviaSolutions' to change its views on the financial viability of Manston Airport. We remain of the view that whilst Heathrow Airport continues to offer substantial freight capacity to a truly global network, and Stansted Airport utilises only around half of the statutory provision of air freighter movements, the London air freight market has capacity to grow without the re-introduction of capacity at Manston Airport. Freight Forwarders have invested heavily in infrastructure around these core airports, carriers have developed their networks as such, and without clear value drivers that support relocating services to Manston Airport, the case remains to be made that demand exists for a freight facility at Manston Airport. This view is reinforced by the empirical evidence of multiple failed attempts to develop profitable operations at the airport.



1. Introduction

1.1. Introduction

Thanet District Council (TDC) commissioned AviaSolutions on 26th June 2017 to provide support pertaining to TDC's treatment of Manston Airport within the Local Plan, and more specifically, to provide commentary as required with regards to Local Plan Representations ("Representations") it received through the public consultation period.

This work scope follows the previous engagement of AviaSolutions by TDC to report on the financial viability of Manston Airport (AviaSolutions: Commercial Viability of Manston Airport¹) and a subsequent Frequently Asked Questions report².

1.2. Documents Reviewed

AviaSolutions has reviewed the following Representations, copies of which may be found in the Appendix of this report.

Colin Bandick	Comment ID 136
Beau Webber	Comment ID 527
David Stevens	Comment ID 826
Phillip Kruger	Comment ID 950
Dover District Council	Comment ID 1221
Bob Parsons	Comment ID 1316
John Jeapes	Comment ID 1425
Supporters of Manston Airport	Comment ID 734

¹ https://www.thanet.gov.uk/media/3500741/Final-Report-for-TDC-Manston-Airport-Viability-Oct2017_2.pdf

² <https://www.thanet.gov.uk/media/3553836/AviaSolutions-FAQ-for-TDC.pdf>

2. Local Plan Representations

2.1. Colin Bandick – Comment ID 136

Representation Details

Comment ID: 136

Respondent: Colin Bandick

Response Date: 30 Jan 2017

Response Type: Object

Summary of Representation

Mr. Bandick surmises that the former Manston Airport site should be reinstated as an airport dedicated to the carriage of airfreight, but also with a parallel development of a rail-head, permitting intermodal freight. It is further suggested that this rail-head would permit the carriage of the Road Feeder Service ("RFS") vehicles on board the freight trains and disperse them via strategic locations throughout the UK. The support for this type of service, would, in Mr. Bandick's opinion, be forthcoming from the rail freight industry.

AviaSolutions Response

In the UK, there are currently no intermodal airfreight to rail freight exchanges³, and the major freight hubs of Heathrow, East Midlands and Stansted are no exception. The reasons are multifaceted and revolve around key areas. Firstly, current legislation permits the carriage of bonded 'Known' freight by Road Feeder Services (trucks) but this does not extend to rolling stock. Secondly, the structure of the industry is highly concentrated amongst the large Freight Forwarders; they have invested heavily (strategically, presenting barriers to entry of new competitors) in their current infrastructure which is centred around hub airports and the distribution channels they can already access.

³ 3. Page 41- Department for Transport (2009), *The Air Freight End-to-End Journey: An analysis of the end-to-end journey of air freight through UK international gateways*. Available from <http://webarchive.nationalarchives.gov.uk/+http://www.dft.gov.uk/about/strategy/transportstrategy/tasts/userexperience/endtoendjourney.pdf>

2.2. Beau Webber – Comment ID 572

Representation Details

Comment ID: 572

Respondent: Beau Webber – Save Manston Airport Association

Response Date: 13 March 2017

Response Type: Object

Summary of Representation

The Representation by Mr. Webber is strongly pro-Manston airport and raises several areas of objection. These include:

- Stating that “There is ... ‘currently unmet demand for freight in the South East, which for the South East of the UK is calculated to be around 80,000 movements’ – this is nearly 10 times the movement requirement for the Development Consent Order, which is 10,000 movements per year. So, to say that there is no need for aviation at Manston Airport requires wilful blindness”

- In the RiverOak non-statutory consultation document, they say, additional facilities proposed include:
 - a base for at least one passenger carrier;
 - an aircraft recycling and engineering facility;
 - a flight training school;
 - a fixed base operation for executive travel; and
 - business facilities for aviation related organisations.

AviaSolutions Response

Several of the URL’s provided by Mr. Webber link to a secure site that has restricted access permissions, so it has not been possible to ascertain the source of these quotes. Notwithstanding this, AviaSolutions believes that the points raised regarding demand / capacity is invalid.

As one of the premier UK freight hubs, Stansted Airport currently handles c. 10,000 ATM annually for dedicated air freighters. This less than half of the statutory 20,500 ATM allocated under its licensing agreement for dedicated freighter operations. Whilst some of these slots are arguably less favourable, or less cost attractive, if demand for these slots were as much as 80,000 ATM, it is difficult to understand why they remain at less than half of their allocation. Furthermore, the industry fully expects a new runway to be built in the South East (the Government currently opting for Heathrow) which will bring additional belly-hold capacity into the market. The strong, mature, long haul market from Heathrow is one of the prime reasons that freight flourishes in the UK; it offers a far wider, more frequent set of destinations than dedicated freighters could ever achieve. Finally, whilst not definitive, it is believed the ‘80,000’ freighters quoted may be a reference to a

York Aviation⁴ report in which (p19), it presents various scenarios and the residual unmet demand. 80,000 ATM in this case correlates to a 'No Expansion' scenario, which is clearly at odds with industry expectations. Furthermore, the report purely considers the effect on the London Area Airports; the residual demand could be met by regional airports such as the national freight centre at East Midlands, or Manchester Airport (same ownership as Stansted under MAG).

In addition, Manston Airport whilst operational, offered the air freight industry additional cargo capacity, though annual cargo throughput remained relatively constant from 2000 to 2013 at around 30,000 tonnes.

With regards to the facilities it is stated RSP wish to provide at Manston Airport:

- A base for at least one passenger carrier - a plausible option - this was explored in the AviaSolutions viability study. This would most likely be a Low-Cost Carrier, seeking to pay the minimal landing and passenger charges. The AviaSolutions Viability Study used a proxy yield of £3.5 per passenger which is above the rates paid by Low Cost Carriers at many regional airports.
- An aircraft recycling and engineering facility - these facilities are courted by many airports around the world, and in the UK. Whilst it is acknowledged that at least one party has expressed an interest in Manston Airport due to a personal tie, this does not substantiate a sustainable economic industry interest.
- A flight training school - many airports offer flight training schools, it is difficult to justify what Manston Airport's unique proposition would be given the relatively thin catchment for such activities.
- A fixed base operation for executive travel - Executive travel in private jets is likely to be undertaken by wealthy individuals and business people. The offer at Manston Airport, located so far from central London, is highly questionable. It is challenging to understand why users would opt to travel to Manston over Farnborough, Biggin Hill, London City Airport or similar mature and more convenient airports.
- Business facilities for aviation related organisations - whilst aviation related organisations would undoubtedly support the airport, the revenue generated by the airport from these activities is relatively small. Typically, this comes in the form of property rent, the market rates for which are not likely to be sufficient to turn the airport into a financially viable entity.

⁴ http://www.fta.co.uk/export/sites/fta/_galleries/downloads/air_freight/air-freight-implications-from-new-capacity.pdf

2.3. David Stevens – Comment ID 826

Representation Details

Comment ID: 826

Respondent: David Stevens

Response Date: 17 March 2017

Response Type: Object

Summary of Representation:

The Representation by Mr. Stevens objects to the SP05 proposal along the following lines:

- It is the view of Mr Stevens that the information put forward by RSP and its associates, in conjunction with the forthcoming proposed DCO process, demonstrates that there is a reasonable prospect of the Manston Airport site being utilised as a fully operational airport.
- Furthermore, it is Mr Stevens view that the AviaSolutions Viability Study, which is being used as evidence from by Council, is not evidence based and is opinion, which has been shown to be unreliable by Mr. Chris Cain, a consultant for RSP for the following reasons:
 - Excluded the RiverOak business plan because Avia would not or could not sign a non-disclosure agreement.
 - When the RiverOak plans are run through the Avia model it shows that the airport is viable.
 - Was based on an out of date growth rate of 1% when it should be nearer to 3.7%.
 - Worked on a modest investment of £77m when RSP are looking to invest up to £300m.
 - Assumed that cargo tonnage would remain static at 30,000 tons when two experts working independently using different models project figures of between 220,000 to 230,000 tons.
 - Uses the assumption that belly hold capacity will be able to take up all the demand, which is simply not the case.
 - Ignored the income and jobs generated from general aviation activities, which is worth between 20%-25% of a smaller airport's total revenue.
 - Ignored the plans for maintenance, repair and tear down which will generate substantial income as well as providing skilled jobs.
 - Focused primarily on passenger not freight which is the basis of the RSP plan.
 - Stated that Manston was in the wrong place, but the key to freight operations is trucking time and Manston is within three to three and a half hours of most of the South East.

AviaSolutions Response

AviaSolutions' Viability Study examined the financial viability of Manston Airport under various demand scenarios. The majority of these scenarios resulted in the airport being financially unviable, predominantly due

to the competitive landscape reducing Manston Airport's ability to attract sufficient cargo and / or passenger traffic.

With regards to the proposal put forward by RiverOak Strategic Partners and its associates, and the forthcoming DCO, it is unclear which material this refers to specifically. In any case, given the DCO is yet to be submitted, AviaSolutions has not had access to this material and cannot provide comment on the probability of its success, or whether it would then result in a financially viable entity as its substance and detail is not known.

With regards to Mr. Stevens comments pertaining to Mr. Chris Cain's evidence and the effect this has on the AviaSolutions viability study.

- AviaSolutions client throughout has been Thanet District Council, therefore all and any work AviaSolutions conducts must be done in a manner that can be shared with Thanet District Council. RiverOak, at the initial meeting between AviaSolutions and RiverOak, made it clear that it did not intend to share its Business Plan, in the same way it had not been shared with Thanet District Council. It is thought that an NDA would not have altered this course of action.
- It is suggested that RiverOak's Business Plan, against the AviaSolutions Viability Study indicates a profitable business, however no information has been provided to this effect. AviaSolutions has not shared publicly its financial model so it is difficult to understand how such a claim could be substantiated.
- Mr. Stevens indicates that the AviaSolutions report is based on '1% growth', however it is unclear what this refers to. A search on the document reveals the only growth rate of '1%' is the 'Tonnes per ATM' at Heathrow when considering the average freight carried on-board passenger aircraft. The actual growth rate in the AviaSolutions model for total freight in the London System is 1.9%.
- The investments used in the AviaSolutions model were based on the demand forecast. In infrastructure investment, normal practice is to stagger facilities investment in line with demand to ensure maximum return on capital investment. The investment is a function of the growth in demand, thus increasing the investment to £300m would simply reduce the free cashflow requirement to service the debt and / or shareholder returns.
- AviaSolutions' model assumed cargo throughput could be between 30,000 tonnes and 140,000 tonnes by 2050 depending on the development of additional capacity at alternative London airports. This is based on a cascade model that AviaSolutions has developed to mimic the most likely business behaviour in a capacity constrained environment. The suggestion that Manston might achieve 220,000 tonnes does not specify which experts have predicted this, although for the purposes of this report it is assumed to be Sally Dixon⁵. This level of freight activity would place

⁵ Sally Dixon – Manston Airport: A National and Regional Aviation Asset: Volume III pg. I

Manston Airport as the 3rd busiest freight airport in the country within 10 years, a case that is simply unachievable under normal market conditions given the level of maturity of the cargo operation at Heathrow, Stansted and East Midlands.

- AviaSolutions has not assumed belly-hold capacity will absorb all freight demand. However, given the extremely mature aviation networks operating from the UK, that belly-hold will continue to represent the largest share of capacity. Bellyhold capacity tends to be cheaper (except on the busiest of freight routes), more frequent, and offers more destinations than freighters.
- General aviation income is usually derived from an FBO license fee and landing fees. By way of a comparator, a highly successful regional UK airport might expect to generate revenues of £1million annually from GA, and after operating costs and overheads are deducted the impact on EBITDA at an airport the size of Manston is limited.
- MRO and Tear-down facilities are large, complex investments that often require operating partners to be involved in the infrastructure proposal and development thus ensuring the facility has a means of revenue generation from the outset. Whilst RiverOak state they will develop these facilities, it has yet to be demonstrated that such facilities are in demand in Manston. Notwithstanding such demand issues, the revenue the airport actually generates from such operations usually only constitutes rent and licenses, which are generally low value operations for the airport.
- Manston Airport is located in the south east of Kent. Viewed on a map, 3/5ths of the circle around it is the sea. It is not realistic that it could be considered as an excellent location for RFSs. Freight transported to Heathrow, Stansted and East Midlands has instant access to the UK motorway network, is much more closely located to large conurbations, and therefore reduces RFS time and cost.

2.4. Phillip Kruger – Comment ID 950

Representation Details

Comment ID: 950

Respondent: Phillip Kruger

Response Date: 17 March 2017

Response Type: Object

Summary of Representation

The Representation by Mr. Kruger objects to the SP05 proposal through an objection to the AviaSolutions Viability Report:

- The AviaSolutions report ignores the impact of BREXIT.
- The AviaSolutions report ignores the impact of the Paramount Theme Park or Ebbsfleet Garden City.
- New runway capacity at Heathrow or Gatwick will not be ready until 2036 so the need for freight capacity at Manston is more pressing.
- The AviaSolutions viability report does not consider the diversified income streams available, as indicated by Mr. Chris Cain in his evidence.
- Lessons to be learnt from other benchmark airports.

AviaSolutions Response

The objections put forward have been considered by AviaSolutions:

- Brexit was not considered directly in the report which was written a few months after the referendum, at which point little was known on the impact Brexit may have. Now, more than a year on from the vote, the impact of Brexit is still unclear, as is the potential positive or negative impact on the freight industry. At present, huge volumes of freight move in both directions across the Channel seeking the most advantageous prices, however, due to the networks available from the UK, generally this is to the UK's advantage and it is believed to be a net-beneficiary. A Brexit agreement that increases the friction in this operation may result in less freight moved across the Channel, and therefore more residual capacity from the UK. However, the UK Government has stressed that it will seek an arrangement with the EU that has the least possible impact on the free movement of goods between the UK and EU states, therefore we would expect the impact to moderately suppress air freight demand in any case.
- In June 2017, it was announced that Paramount has pulled out of the proposed an entertainment park development in Swanscombe, Kent. Despite this, the developers are continuing the planning and though there is clearly a risk that the project may never materialise, therefore incorporating any incremental demand assumptions would not be prudent. Furthermore, the airports at Gatwick and Southend will both be closer to the theme park than Manston, therefore any benefit to Manston Airport is considered marginal at best.



- New runway capacity consensus amongst the industry is that it will be operational by 2030, which leaves a limited period of time for Manston Airport to develop its infrastructure and operation to recoup its investment. Currently there is residual capacity at Stansted airport to handle freighter operations, and airports in the Midlands have additional capacity. This again indicates that should Manston Airport re-open, it will face stiff competition from the outset.
- Whilst the income available from diversified business opportunities certainly augments airport profitability, the ability to generate such income on a long-term basis is challenging. Businesses of these type require high levels of investment meaning that barriers to entry are high, furthermore once they are established at an airport their barriers to exit are high. It is AviaSolutions' opinion that such businesses are unlikely to invest in Manston Airport until such time as they can be sure of its long-term future. Manston Airport presents significant risk, particularly in light of its recent track record of unprofitable operations.

2.5. Dover District Council – Comment ID 1221

Representation Details

Comment ID: 1221 Respondent: Dover District Council
 Response Date: 23 March 2017 Responses Type: Observation

Dover District Council’s representation raised no objections, rather it provided a commentary on the process thus far, and the position of the Council. In summary, it stated that Dover District Council upheld its previous resolution with regard to the airport;

“This Council supports the campaign to retain Manston as an operational airport, recognising the role and place it can have in the UK aviation industry, making the better use of regional capacity in accordance with the views of the South East Local Enterprise Partnership, while making a significant contribution as one of the strategic priorities for regeneration of the East Kent area”

The Council came to this conclusion through an appraisal of the process to date including:

- A summary of DDCs agreed representations to TDC, including; an encouragement on TDC to more actively engage in the Duty to Cooperate (DCT) system, until any DCO process is concluded not to change the designation of the site away from ‘Aviation Use Only’; a clear specification of other potential uses of the site, and a consideration of the impact on DDC of such uses.
- The chronology since its original resolution was passed in July 2014
- A summation of potential interested parties including RiverOak Strategic Partners and City financier Eddie Truell.
- A summary of the potential challenges DDC has to a housing and commercial development, including; employment and leisure floor space demand, the district centre and its effect on trade in across the two authorities’ constituencies, and the visual impact on the landscape of any redevelopment.

AviaSolutions Response

DDC do not raise any objections specifically related to the viability of Manston Airport, rather it focuses on the process and political aspects. As such, AviaSolutions has not provided further comment at these areas of concern are outside of its remit.

2.6. Bob Parsons – Comment ID 1316

Representation Details

Comment ID: 1316

Respondent: Bob Parsons

Response Date: 13 February 2017

Response Type: Object

Summary of Representation

The Representation by Mr. Parsons objects to the SP05 proposal through an objection to:

- Manston’s location has been described as being remote from a reasonable catchment area to support passenger flights but this is exactly the opposite for cargo where it is located close to dual carriageway and motorway routes avoiding the capital, railway infrastructure and ferries for efficient payload ground handling. The airport can deliver similar services for air cargo that the three-year-old London Gateway does for marine containers currently transferred from/to about five Freightliner/DB Cargo rail services in each direction per day.
- Manston has the potential to also develop some passenger services; some perhaps linked to operation of regional combi aircraft with a cargo capacity of (say) 3,000kg-4,000kg and 50 passengers to destinations beyond a reasonable time achievable by road or rail for time critical business and able to mix passenger and cargo capacity to ensure a high overall load factor.
- With its 2,750m runway the airport also has the potential to accept the largest aircraft for maintenance and end of life recycling which was a minor business under previous owners but is increasingly important for aircraft manufacturers’ life cycle planning. The process removes reusable equipment that might then be reconditioned and form part of maintenance of equivalent aircraft with a continuing working life, the remainder of the body being deconstructed for removal to specialist recycling businesses.
- Turning to ground transport, there is a fairly high volume of air cargo moved by road between airports. As an example, the German operator Lufthansa operates about 200 HGV services, Mondays to Fridays, serving UK airports. Attracting cargo from/to Manston can, as with marine containers, allow for air cargo to be conveyed directly by rail from/to inland terminals in a similar way to present Royal Mail rail services and the planned international “Euro Carex” rail operation (Eurotunnel being the UK partner, the trains planned to use Deutsche Bahn’s rail freight terminal at Dagenham via HS1).



AviaSolutions Response

AviaSolutions has reviewed the representation and provides the following response:

- Manston Airport is located in the south east of Kent. Viewed on a map, 3/5ths of the circle around south east Kent is the sea. It is not realistic that it could be considered as an excellent location for RFSs. Freight transported to Heathrow, Stansted and East Midlands has instant access to the UK motorway network, is much more closely located to large conurbations, and therefore reduces RFS time and cost.
- In the UK, there are currently no intermodal airfreight to rail freight exchanges⁶, and the major freight hubs of Heathrow, East Midlands and Stansted are no exception. The reasons are multifaceted and revolve around certain key features. Firstly, current legislation permits the carriage of bonded 'Known' freight by Road Feeder Services (trucks) but this does not extend to rolling stock. Secondly, the structure of the industry is highly concentrated amongst the large Freight Forwarders; they have invested heavily (strategically, presenting barriers to entry of new competitors) in their current infrastructure which is centred around hub airports and the distribution channels they can already access.
- Whilst the income available from diversified business opportunities certainly augments airport profitability, the ability to generate such income on a long-term basis is challenging. Businesses of these type require high levels of investment meaning that barriers to entry are high, furthermore once they are established at an airport their barriers to exit are high. It is AviaSolutions' opinion that such businesses are unlikely to invest in Manston Airport until such time as they can be sure of its long-term future. Manston Airport presents significant risk, particularly in light of its recent track record of unprofitable operations.
- The suggestion for operators to utilise 50 seat combi aircraft is an interesting consideration, however, there are no airlines operating these aircraft types in the UK or Europe, and the concept is largely out-dated globally in all but the most remote regions; it would be challenging for the airport to attract such an operator. Furthermore, the range of such an aircraft would be considered limited, only able to operate to destinations that are currently operated to by aircraft from Heathrow and Gatwick. Such short haul flights attract very little freight which is generally transferred throughout Europe by RFS.

⁶ 3. Page 41- Department for Transport (2009), *The Air Freight End-to-End Journey: An analysis of the end-to-end journey of air freight through UK international gateways*. Available from <http://webarchive.nationalarchives.gov.uk/+http://www.dft.gov.uk/about/strategy/transportstrategy/tasts/userexperience/endoendjourney.pdf>



2.7. John Jeapes – Comment ID 1425

Representation Details

Comment ID: 1425

Respondent: John Jeapes

Response Date: 10 February 2017

Response Type: Object

Summary of Representation

The Representation by Mr. Jeapes objects to the SP05 proposal through an objection to various aspects:

- Mr Jeapes has a clear belief that Aircraft Tear Down and Recycling would be suitable for Manston Airport and that this should be consider further.

AviaSolutions Response

AviaSolutions has reviewed the representation and provides the following response:

Whilst it is evident that Mr Jeapes has domain knowledge of the Aircraft Recycling sector it remains questionable whether:

- Aircraft recycling alone could support Manston Airport’s viability.
- Any investor has the desire to invest in potentially the world’s largest aircraft recycling centre in Manston Airport.
- Investors are willing to invest in Manston Airport given its uncertain future, or at what point in the future they may wish to invest. It is not unreasonable to assume they may defer investment for two years to ensure the airport is viable.
- Manston or the wider region in Kent has the labour knowledge and skills to support an operation in its start-up phase.
- How competitors will react. It would be highly unlikely that those businesses already operating in this sector would simply accept a loss of business.
- How such a business located in Manston, with its relatively high cost base vs. emerging economies, will compete in a labour-intensive industry.

2.8. Supporters of Manston Airport (SuMA) - Comment ID 734

Representation Details

Comment ID: 734

Respondent: Ruth Bailey, on behalf of Supporters of Manston Airport

Response Date: 16 March 2017

Response Type: Object

This document has been supplied as a non-submitted Representation.

The objections are as follows:

- AviaSolutions Viability Study cannot be used as evidence as it failed to meet the brief in that it did not consider ALL options, including various diversified businesses.
- The AviaSolutions report does not consider opportunities to offer short term capacity at Manston Airport whilst a new runway is developed, and then transfer/ redistribute services to a new runway at Heathrow or Gatwick.

AviaSolutions Response

AviaSolutions has considered the document supplied and has provides the following response:

- AviaSolutions considered what it believed to be the most viable means of ensuring the airport became a financially viable entity. This approach has been adopted because an airport must have a profitable core service offer. It is not conceivable that an investor would invest c. £75m - £300m to develop a business where its core service is unable to generate profits. In airport terms, this means the airport needs to be profitable from either its passenger or cargo operations, or a combination of the two. Additional and auxiliary services, no matter their number or diversity, should serve to improve EBITDA margins and generate incremental profit. If these businesses are required simply to break-even, the risk is likely to be considered too great for investors.
- With regards to a joint venture / share of operations with either Heathrow or Gatwick, airports in the UK operate in a free market and compete to attract airline customers. Airlines in turn operate their fleet, network and schedule for commercial objectives. In our view, Manston Airport (working with either London Heathrow or London Gatwick) could not develop the above proposition as neither Manston nor Heathrow/Gatwick has the authority to 'direct' aircraft to alternative airports. Furthermore, the commercial proposition to the airline is simply not the same, as operations from Manston Airport (when compared with Heathrow for example) will not generate the same levels of demand or average seat yields. A further key feature of Heathrow Airport is the diversity of connecting options, which would not be available at Manston. The concept of an airport seeking to 'redistribute' airline traffic is simply untenable in the UK aviation sector.

