

Phil Rose - Interested Party 20014186

Written summary of (planned but not read out) oral submission to the ISH on Compulsory Acquisition – 4th June 2019

RSP fails to make a compelling case in the public interest for this compulsory acquisition. The plusses and minuses simply do not add up in RSP's favour.

There is no need for this project:

- No national policy statement supporting the creation of a new dedicated cargo airport at the edge of Kent
- The DfT isn't forecasting growth in cargo ATMs¹
- No convincing evidence of a market need for a new UK cargo airport at all, let alone one in this location²
- There's surplus capacity for dedicated freight at Stansted, East Midlands and at regional airports³
- The dedicated air freight market is increasingly efficient. The number of ATMs has halved since Manston first became a commercial airport⁴.

RSP's plan isn't viable:

- Manston failed in a market twice the size of today's. Fifteen years of commercial cargo operations at Manston, three different owners, and the capacity (Mr Freudmann is on record as saying) to handle over 200,000 tonnes of cargo resulted in one liquidation; one sale for £1, one closure and over £100m of losses⁵
- Experienced and credible aviation consultants – Falcon, Avia, Altitude and York Aviation – all conclude that an airport here would not be viable⁶
- Dr Dixon's forecasts take no account of potential viability. The evidence from Interested Parties shows that Dr Dixon's suite of Azimuth reports is fatally flawed and that her forecasts cannot be relied on⁷
- The business plan is remarkably lightweight – no cost of capital at all; no detailed workings; and it relies on assumptions about pricing that have not been market tested
- It's frankly bizarre that RSP thinks that, in a couple of years, it can attract a much greater level of business than was ever achieved before by offering a more expensive product and no scheduled night flights in a smaller market.

¹ Set out in NNF02, NNF06, NNF13 and NNF16

² Set out in NNF02, NNF06, NNF13, NNF16 and NNF17

³ Set out in NNF02, NNF06, NNF13, NNF16 and NNF17

⁴ Set out in NNF02, NNF06, NNF13, NNF16 and NNF17

⁵ Set out in NNF02, NNF04 and NNF06

⁶ Set out in NNF03 and NNF05 as well as in SHP's representations

⁷ Set out in NNF06, NNF07, NNF08, NNF11, NNF13 and NNF16

Messrs Freudmann, Yerrall and Lawlor failed to convince TDC's Labour administration, then TDC's UKIP administration, that they were a viable partner to fund TDC to do a CPO for the site. They repeatedly failed to show evidence of funding and a credible business plan⁸. TDC also had concerns that SHP's plans for the site made it difficult to say that there was a compelling case for a CPO⁹

The downsides are immense. RSP's proposal:

- will create significant construction then operational noise and air pollution from aircraft and from hundreds of HGVs a day
- threatens wildlife at national and internationally important sites
- will damage the area's important and growing tourism industry¹⁰
- Public safety zones will blight planning decisions, limit future development and constrain a strategic housing site¹¹
- Aviation use would deny us SHP's plans for the site. We'll lose thousands of homes on a purpose built site with supporting social infrastructure; modern employment premises; significant amounts of new open space; new leisure facilities capable of attracting visitors into the area; and jobs spread across a large number of employers. This would be a significant cost to the community
- There is no compelling case in the public interest in favour of RSP's proposals.

⁸ Set out in NNF03 and NNF05

⁹ Set out in NNF03

¹⁰ Set out in NNF11, NNF13 and NNF16

¹¹ Set out in NNF17