

From: [REDACTED]
To: [Manston Airport](#)
Cc: [Richard Price](#)
Subject: Manston Airport DCO
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Attachments: [DCO Submission 14 June 2019.pdf](#)

I have now reviewed some of the other questions and answers raised at the recent examination meetings and would like to make the following submission attached. The submission covers the areas of Public Interest and National Significance and Noise.

I will be grateful if you will confirm receipt and that this will be accepted as a submission.

Adem Mehmet

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This submission is in response to questions raised and answered at the recent hearings. The submission covers the areas of the Public Interest Test and National Significance and Noise.

The Public Interest Test and of National Significance

In order for a project to receive support from The Secretary of State it must be shown that it is in the public interest and of national significant importance. One issue that RSP raise as being of significance is the number of jobs that an airport at Manston will generate. They make this claim notwithstanding the low number of jobs it generated in the past and the RSP claim that they will use up to date technology which generally reduces the number of jobs in an industry.

The sponsor has made much of the large number of jobs that will be created by the project. In Volume IV of the RSP submitted document 7.4 Azimuth Report on page 17 the sorts of jobs suggested to be created are Direct, Indirect (employment in the supply chain), Induced (jobs created by those connected to the airport spending their income) and Catalytic (those associated with the aviation sector outside the local economy where the airport operates). In order for these job creations to be properly claimed on a national basis they must be jobs that are newly created as a result of the nationally significant project adding to the wealth of the UK. If the direct jobs created at Manston are the result of the new airport taking business from other UK airports then no new jobs have been created in the UK, there is no national importance to the project and it cannot be claimed to be in the public interest. Taking business from Stansted to Manston with Manston creating 5 jobs and Stansted making 5 people redundant does not create any jobs and is not in the public or national interest. In addition, the other types of jobs that RSP identify and claim will be derived from an operation at Manston will only be derived if there is an increase in the overall activity in the UK. Bringing flowers from Holland to Manston instead of Holland to Luton does not have any effect on the supply chain at all. Taking business from one airport and moving it to another also merely moves catalytic employment from one area of the UK to another, this is not in the public interest or of national significance.

RSP and Dr Dixon do not seem to appreciate the points above. In the RSP document 7.4 Azimuth Report Volumes 1-4 various claims are made about job creation. However on closer inspection we find that these jobs are not new jobs for the UK but jobs which will be created at Manston but lost elsewhere in the UK at another airport. I list below a number of examples but there are many more.

1. In Volume I on page 39 Clause 6.4.11 and 6.4.12 talk about the trucking of freight, the suggestion being that this freight could be flown in to Manston instead. This does not create jobs in the UK, trucking jobs will be lost, trucks will be decommissioned leading to less demand for trucks thereby losing jobs in vehicle manufacturing. As no new product has been created there will be no indirect jobs created. Catalytic jobs will just be moved.

2. In Volume II on page 39 all of the items described are already activities undertaken by existing companies flying into UK airports. Merely moving these operations to Manston does not create any new jobs of any of the RSP categories in the UK. Clause 4.2.41 mentions Harrods Aviation which currently operates at Luton and Stansted with an engine shop at Farnborough. Moving these to Manston does not create new jobs in the UK.

3. In Volume II, page 56 Section 5.1 is titled Attracting air freight to Manston Airport. It suggests that freight would move from Heathrow to Manston. This again does not create new jobs in the UK. On page 57 there is a section on channel crossings and trucking but again, movement from one form of transport to another does not create jobs in the UK. Page 58, Clause 5.1.12 - Changes to preference for belly freight - talks of carriers moving from belly to dedicated freight operations. Again, this does not create new jobs in the UK it's just job displacement.

4. In Volume III on page 7 at Clause 2.2.10 it talks about the calculations done by Dr Dixon taking into account the cost of switching airports when considering whether integrators and freight forwarders move to Manston. Again this does not create new jobs in the UK. On page 12 Section 3 describes the benefits for businesses that move from other airports to Manston. Again, moving operations from one airport in the UK to another is not creating new jobs in the UK.

5. In Volume IV page 32 at 5.5.1 they talk about TG Aviation creating new jobs at Manston. This is a company that was historically based at Manston but moved away from the site after a dispute and legal case with the owners. TG Aviation still exists locally in Kent so jobs were never lost and no new ones will be created if they move back to Manston. Clause 5.5.2 talks about Polar Helicopters, a company that continues to operate at Manston, and I have not seen anything to suggest that would change if the DCO were not granted. These are not new jobs and any further jobs created via expansion would do so whether the DCO was approved or not. Likewise for AvMan Engineering; indeed the alternative plans for the site from SHP envisage an advanced manufacturing and engineering business park within which AvMan could no doubt expand. On page 32, Clause 5.5.5 it mentions MRO activities, these like the others above should not be considered as they are not part of the DCO which is purely based on freight operations.

6. On page 54, Clause 9, Conclusions they talk in Clause 9.0.2 about the number of jobs created by both freight and passenger operations, however this DCO is based purely on freight so in assessing its benefits, any employment from passenger operations must be ignored as must those in MRO, TG Aviation, Polar Helicopters, AvMan Engineering etc. In addition, as detailed above, a number of the jobs claimed will be those displaced from other airports in the UK which, when assessing the project for public interests and national significance purposes, should be removed.

I suggest the Examiners of this project must be wary of the claims made by RSP when they suggest jobs will be created and that this contributes positively when testing public interest and national significance. I suspect if we remove all the above factors from the 2,150 direct employment jobs by year 5 we may well end up with what we historically had at Manston: not very many.

On an unrelated point, but referencing the same RSP Azimuth document, the examiners may wish to bear in mind when considering the integrity, independence and bias of this report that in Section 4.4 Passenger Focused Findings, Figures 13 and 14 were produced by a company called Lab-Tools Ltd. Dr Beau Webber a leading figure in the pro airport campaign group SMAA is a director of Lab Tools Ltd.

Another development I'm sure the examiners will be aware of but which is relevant to this DCO application is that Prestwick Airport has today been put up for sale by the Scottish Government. It is incumbent on the sponsor of any DCO project to consider alternatives that may deliver the same benefits. Perhaps the examiners can enquire as to whether RSP have considered purchasing Prestwick, an already functioning airport that they can develop further into a freight hub. Prestwick

sounds very similar to Manston but there's not a town of 40,000 people at the end of the runway. Ayr MSP John Scott said: "Prestwick has all the foundations for success - the longest commercial runway and parallel taxiway in Scotland, a reputation of being Britain's only fog-free airport, its own dedicated railway station, and a thriving aerospace campus. What it now needs is an owner prepared to put in the investment to take the airport forward as the major economic asset it undoubtedly is." Sounds perfect for RSP - and they recently described it during the examination as the best fit compared to Manston.

Noise

I have seen many comments regarding noise and Ramsgate. The sponsor claims that only 225 properties will be affected by its operations. It is inconceivable that houses at Wellington Crescent and Albion Place Gardens will not be heavily affected by the operations of this freight hub if approved as they were heavily affected when the airport was open on a much smaller scale. I previously sent noise monitoring data taken at that time and note others have done so more recently which are completely at odds with the analysis done by RSP based, no doubt, on very generous assumptions. I note the RSP noise contours have now been challenged by evidence in the form of noise contours produced by the CAA from other interested parties including NNF which clearly reflect a more realistic position of the situation. However I think it's fair to say that any of these desk based approaches, being based on assumptions and averages, will still underestimate the real impact from an individual plane that had to be actually experienced in order to appreciate and understand. I and others have also previously sent photographs showing how low planes are in this area which is the furthest part of Ramsgate from the end of the runway.

I understand that at London City around 6500 dwellings receive compensation for noise mitigation and if the same measures, on the same basis were applied for Manston it would be thousands of dwellings affected. All the residents of Ramsgate are asking for is to be treated in the same way as residents around other airports are by their owners. RSP have set levels and produced calculations on the basis that they wanted to compensate the fewest number of people in order to keep costs down. This is not what other airport operators do, is certainly not government policy and if RSP do not want to act reasonably in this respect they should not be granted a DCO. I am confident that if the owners of Heathrow or East Midlands were the sponsors of this project, the compensation payments would be over a much wider area; but then these operators are not and never were interested in Manston, even when it was available for £1 (plus balance sheet liabilities) as they know it never has been nor ever will be viable.