

1 PINS registration identification number:- 20013678

Paul Hudson.



14-06 2019

Re:- Manston Airport Development Consent Order

Dear Sirs,

It is my understanding that Development Consent Orders have in the past been raised by Local or County Councils to purchase property so that new road systems, or similar projects, can be built. It seems odd that a private company should be entitled to the same privilege to build a Cargo Hub on this old runway at Manston.

The meaning of Hub is that it is the centre of a wheel from which spokes radiate, take Manston as the hub and the road network as the spokes we then have our hub at an extreme corner of the U.K. and not in the centre.

If you were to draw two imaginary lines of sight to encompass the whole of the U.K. with Manston as the starting points the resultant angle is approximately 115° of land mass leaving us surrounded by 245° of sea.

It does not appear to be a very central location.

As a long term resident of Central Harbour Ward in Ramsgate I would like to be able to express my concerns accordingly.

1. A Cargo Hub of this proposed stature will inevitably impact on the present road system, as the volume of lorries along with their attendant noise and air pollution will increase to the detriment of the local environment and community.

2. I live in within sight of the local grammar school, Clarendon House, planes will fly low and directly overhead. I am concerned for our health and safety because of the increased noise and air pollution that will undoubtedly accompany such a large operation. A 24/7 cargo hub raises great concern for our children's education in this noisy and potentially disruptive environment, and at night to get enough sleep, as being disturbed once in the night will be once too many, and I fear that there will be more than one per night.

3. The flight path runs straight over Ramsgate and our 40,000 residents. If this was a new development it would surely never be considered by the Planning Inspectorate. Noise levels and the attendant air pollution that will accompany these Air Traffic Movements will be a major concern, and have a high degree of impact upon us all.

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4. The Buildings of Historic Interest and the Conservation Areas in Ramsgate will surely be at risk from the resultant vibration, noise and air pollution that will accompany such a large development.

Owners & Operating companies have come and gone over the years but none of them have come to anything. Perhaps it is time that we turned the page on Manston Airport for commercial activity and start doing something more useful with the land. Manufacturing , Housing & Leisure Facilities, would be help many people in Ramsgate. The good people of Ramsgate will have to live with the continuous environmental fall-out that a would arise from a decision to proceed with the Development Consent order.

Therefore I conclude that this application for Development Consent should be denied.....



Life Under The Flight Path.

I wonder how many people remember when debris from a plane crashed through the roof of a property in Nethercourt, it happened, but was quietly dealt with by the powers that be. No mention of the incident since, it's as if it has been deleted from popular memory.

When the R.A.F. were stationed at Manston the bulk of the flying time was

finished by 21:00hrs. With only the occasional "Night Flight". I have lived in several areas of Ramsgate over the years and I must say that whenever there were flights from Manston there was no missing them. Windows have been known to rattle. The larger planes you could physically feel them when they passed overhead. The flights at night either frequent or not would act as impromptu wake up calls, whether or not you needed one, creating broken sleep patterns. In the daytime you would have to pause, mid conversation, while a plane passed overhead. If you took a telephone call, and then a flight came over, you would be drowned out by the noise; my son has often asked "what was that". When he would come to visit with my grandchildren they could not believe how low the planes flew and that you could clearly read the plane I.D. number and see the landing gear. They used to wave at the pilots.... Whenever there was a pilot training programme, the Bump & Jump flights were relentless, round & round they would go, I suppose it was giving us a feel for how busy the airport could be, and to be honest, it was not at all pleasant. The larger the plane the greater the nuisance, only the small "Fokker 100" planes that operated for a short period were anywhere near acceptable.

Apparently back in 1993 the D.O.T. examined runway capacity in the South East and found Manston unsuitable for development due to its proximity to the town of Ramsgate. What has changed, neither the Airport nor the Town have moved. This whole situation is like having the "Sword of Damocles" hanging precariously over our heads....

Extracts from AviaSolutions Feasibility Study September 2016

8.1. Conclusions. Introduction In this chapter we draw together the conclusions of our research and analysis to form our conclusions, specifically to opine on whether there is a realistic prospect of a financially viable airport operating on the Manston Site.

8.2. Summary. It is AviaSolutions view that having considered the stakeholder interviews and independent research and analysis into historic accounts and 'reasonable' adjustments for one-off costs that there is little prospect of a financially viable airport on the site. The only circumstances in which we believe the airport may be viable is that in which no new runway were developed in the South East of England. However, this scenario presents extreme risk to the investor, as a decision to increase runway capacity at those not physically constrained (e.g. legally constrained LHR and STN) could be made at any time, or a new runway may be authorised at any

time in the future.

8.3. Stakeholder Interviews. Our stakeholder interviews were split between those focused upon passenger development and those focused upon freight development. The range of interviews provided an understanding from the industry as to their position on the airport. Our passenger service interviews suggested that overall there is little interest in serving the airport, in particular from airlines that had previously served the airport such as Flybe. There was some limited interest from airlines such as Ryanair and KLM, who would consider the airport as part of their standard UK market review, however they were not actively seeking to serve the airport. It is our view that we must consider this in light of its context; for an airline that bears no risk in an airport's reinstatement and for whom its reinstatement may present upside risk, it would be illogical to rule out the possibility of serving it. *Overall, our interviews suggested there was very limited interest in the airport for passenger services thus suggesting a long term viable passenger service may be difficult to sustain. Our freight interviews indicated that the demand to use the airport for freight was very limited. This, in large parts, is due to two factors; the infrastructure investments that have already been made by the industry around Heathrow and Stansted, and the geographical location of the airport. Infrastructure, and the associated knowledge, skill and supporting industry at airports such as Heathrow and Stansted, as well as the major European hubs such as Frankfurt, and Paris, would be almost impossible for Manston to replicate. The geographic location of the airport, tucked into the corner of the UK, cannot compete with airports such as East Midlands for Integrator services that are sold as fast delivery, due to the increases in surface transportation times.* The interviews did however indicate that charter services and ad-hoc freighter flights would certainly return, providing some revenue income for the airport. In summary, we conclude that freight would return to the airport in limited quantities, not dissimilar to the tonnage previously processed at the airport.

8.4. Simulations. AviaSolutions' models provided simulations of the financial performance of an airport on the site under different demand scenarios. These scenarios were developed with a positive view of the potential demand profile, unit revenue and unit cost and investment costs. Two simulations (LHR3 and LGW3) suggested that the airport was unlikely to generate profits at an operational level (EBITDA) until circa FY2025, and that these profits would remain muted through until FY2040. The EBITDA

profile suggests that, based on recent industry exit multiples, it would not be possible to recover the initial equity through a sales process as this point. Furthermore, these scenarios suggest that retained earnings would not turn positive for 15 to 20 years, thus limiting the ability of an investor to recover their costs of equity. In summation, these scenarios present very large risks with small returns over a long time horizon.

Our 'Both' runway scenario, naturally, provides an even less favourable result for Manston airport. If this runway scenario were to materialise there would be no prospect of Manston operating on a sustainable basis.

Our 'No Runway' scenario presents some opportunity for the airport. As demand through the London System increases and capacity remains muted, this demand will be spill to alternative airports. Manston, located within reasonable distance to London could be an airport to benefit from this spill, along with airports such as Southampton and Birmingham who are well connected by train to London. In our simulation, this scenario generated sufficient operational income (EBITDA) to support itself, and only required additional financing to expand. However, we must caution that this scenario is balanced in a careful equilibrium, should this be disturbed through the introduction of additional capacity via a new runway or loosening of regulation, the prospects of Manston could be severely diminished.

11.1.9.Conclusion. Given the parameters of this specific scenario it could be feasible to operate a commercially viable airport on the site. However, the risks in doing so are high and many of the elements that cause the proposal to payback can be reversed (such as a new runway being authorised) and are out of the control of the asset manager. Whilst we believe an airport on the site may be feasible in this scenario, the probability of there being no new runway in the South East is very low, even if a decision is delayed, it is still expected that a new runway will be required at some point.

If Manston were to become an established airport it would need many years to reach a point of maturity where it would be able to withstand a new runway becoming operational. The probability of this occurring, given the Government's current position on runway capacity, is uncertain at best. Therefore we conclude that whilst potentially feasible, this scenario is improbable.

Executive Summary. AviaSolutions has reviewed the cases for Manston Airport prepared by Azimuth Associates and Northpoint on behalf of RiverOak Strategic Partners in February 2017. Azimuth's case for Manston Airport is based on an assessment of the airport's ability to capture a

significant share of the air and road freight market in London and the south east. Northpoint's forecast is based on a similar premise coupled with the introduction of multiple aviation related auxiliary activities. AviaSolutions' view is that the Azimuth and Northpoint forecasts both represent a highly ambitious outlook for air freight volume at Manston Airport and the likelihood of the forecasts being realised is very low. We do believe that there may be scope for the reintroduction of passenger services, broadly consistent with the volume projections set out in AviaSolutions report, although this alone would not generate sufficient revenue to develop profitable operations. Neither report puts forward a sufficiently credible case, nor provides 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 an extensive global network, and Stansted Airport offers capacity for 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 the UK's core cargo airports and carriers have developed their networks as such.

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. Provision of capacity alone is no guarantee of financial success, a view reinforced by the empirical evidence of multiple failed attempts to develop profitable aviation operations at Manston Airport.

2.4. Conclusions. Avia has considered the material set out in the Azimuth report which presents traffic forecasts for Manston Airport and is intended to establish the rationale for retaining Manston as an operational facility that contributes to the national aviation network.

Traffic forecasts are inherently subjective, but should be based on professional experience and judgement. However, at the heart of the Azimuth forecast is an assumption that there will be a paradigm shift in the approach to air freight in the London and south east, which will stimulate a switch from road freight to air freight and see significant air freight capacity move eastwards from London's Heathrow and Stansted airports. Given that Heathrow continues to offer substantial bellyhold capacity to a truly global network, and Stansted is utilising only around half of its statutory provision of air freighter movements, Avia's view is that the Azimuth forecast represents a highly ambitious outlook for air freight at

Manston Airport, and one where the probability of such an outcome arising is very low under normal market conditions. We do however believe that there may be scope for the reintroduction of passenger services, broadly consistent with the projections set out by Azimuth and AviaSolutions' earlier report.

Avia's opinion, based on updated market information since the publication of our previous study (September 2016) is consistent with our earlier view that Manston Airport does not represent a financially viable investment opportunity under normal market conditions. As such, our conclusions are very much at odds with those of Azimuth, which in our opinion do not sufficiently consider or recognise the risks associated with investment in an airport which has failed to generate adequate financial returns since privatisation in 1998......

Extract from letter from T.D.C. to the Rt Hon Sajid Javid M.P. 30-01-2018

Re:- Thanet Local Plan Options

During the process, one of the key issues has been the future of the Airport site at Manston, and this has been the primary cause of delay to the progression of the draft local plan. The Airport closed in May 2014. During 2014 & 2015, the council carried out a number of exercises to seek to identify a C.P.O. Indemnity Partner (a third party who could cover the costs of compulsory purchase of the Manston Airport site). However, following a number of unsuccessful exercises, in June 2016 this process was discontinued. Following legal advice, in the latter part of 2016, the council took the further step of commissioning AviaSolutions (a specialist aviation consultancy) to advise on the potential viability of Airport operations at Manston. The commission required advise on "whether airport operation for the site and whether there would be a reasonable prospect of that occurring within the period of the Local Plan (ie:- to 2031), so that (the Council) can consider the options for the site" The report concluded that "airport operations at Manston are very unlikely to be financially viable in the longer term, and most certainly not possible in the period to 2031". The site is largely previously-developed, and was subsequently identified for mixed use development in Proposed Revisions to the draft Plan, published for the consultation in January 2017.....

Extract from a letter by Keith Taylor M.E.P.:- 01-10-218

"I believe that particulate pollution from the proposed freight hub would

seriously impact on the health & well being of local communities in the surrounding towns & villages.

The cargo movements proposed would represent a substantial increase in pollutant levels. Native birds that have conservation interest will undoubtedly be affected by the proposed development.

Manston is within 10 kilometres of six nationally designated conservation sites, including the Thanet Coast Site of Special Scientific Interest. It is particularly close to the internationally recognised Sandwich & Pegwell Bay National Nature Reserve, a complex habitat of international importance.

Noise is also a concern, Manston's flight path passes directly over the town of Ramsgate & it's 40,000 inhabitants. The biggest issue being Night Flights.

In the past R.S.P. have repeatedly denied that Night Flights are part of their business plan, it is now clear from documentation & has been confirmed to the media, that Night Flights are in fact part of the proposals. The airport's history suggests it is extremely unlikely that it could ever become a commercially viable operation.

Manston Airport has consistently failed to be a viable hub for the South East & plans to reopen it distract further from serious & sustainable regeneration & job creation in Thanet. The vision of Manston as a freight airport is not a new one. Under three private owners, freight formed a core component of the airport's strategy from 1989 to it's closure in 2014.The fact that none of the previous operators, despite considerable investment, have managed to make a commercial success of the airport has been attributed to Manston's peripheral location & Thanet's relatively poor infrastructure connections with the rest of the U.K.

I cannot believe that R.S.P. expects to overcome these existing obstacles. It is also very difficult to see why the site in conjunction with R.S.P's proposal should be regarded as a National Significant Infrastructure Project, a requirement in order to be considered for a Development Consent Order to seize the site from the current owners. The need for reopening Manston Airport in terms of Costs, Air pollution, Noise pollution & community impacts have not been sufficiently taken into account & the economic benefits overstated.

Once the negative impacts & the true costs are taken into account, I believe that no net benefit will arise, the proposed development should be rejected.

The good people of Ramsgate will have to live with the continuous environmental fall-out that a would arise from a decision to proceed with the Development Consent order.....

Our lives and well-being are now in your hands, please help us.....

I conclude that this application for Development Consent should be

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denied...

Yours Faithfully, **Paul Hudson.**