

From: [REDACTED]
To: [Manston Airport](#)
Cc: [Richard Price](#)
Subject: Manston Deadline 9
Date: 29 June 2019 15:31:36

Dear Sirs,

Here is my submission for deadline 9; I understand it is a day late for which I apologise and can only plead pressure of work as an excuse. I hope you will feel able to extend a little flexibility by accepting it.

I am writing, once again, to object to the granting of a DCO on the former Manston Airport site.

Throughout the lengthy and continuing examination by the ExA as to whether or not a DCO should be granted, there have been numerous occasions when it has been felt by many that the process must inevitably be halted due to the clearly flawed application (and that is about the kindest construction which can be placed on it), by RSP, who have the declared intention to open a 24/7 cargo hub which would render Ramsgate and surrounding areas virtually uninhabitable.

In some ways the opportunities implicit in this application are quite beguiling. Apparently, anybody can invoke a DCO based on the flimsiest evidence of NSIP status. You don't have to have any money to speak of; you don't need a credible business plan; you can base your application almost solely on a report by an individual with no aviation experience whatsoever (whose only longer document – probably, was their PhD dissertation); moreover, you can ignore the comprehensive reports of acknowledged industry experts who find your theories ill-founded and totally at variance with evidence from the real world of cargo movement; you can have a history of total failure in your various aviation projects to date, all leading to eye-watering financial losses for all concerned (except you). During the examination process you can evade and avoid pertinent questions, or indeed, state you're not going to answer them at all; you can ignore all deadlines set by the examining authority without having your proposal dismissed out of hand as a result, and you're permitted to submit erroneous data which even a cursory google search would disprove, despite all of which you can still expect your application to receive due consideration.

While the numerous subjects for discussion have been spotlighted over the months (night flights, noise contours, QCs, particulate contamination, public safety zones, traffic management, HRDF, employment projections, etc, etc, etc), all of which have been explored in considerable detail, it seems evident that the foundation upon which the DCO was built, that the site is a NSIP, has most definitely not been proved. On the contrary, many airports in this country, all of whom have access to far better infrastructure than do we in the Isle of Thanet, have plenty of capacity for more cargo haulage opportunities, which is not being taken up. This is quite apart from the trend to fly cargo, belly-hold, in passenger aircraft because it's cheaper. Despite many SMA supporters wistfully anticipating flights to holiday destinations from their own local airport, they will not be doing so in cargo aircraft. Passenger flights, according to RSP, are dependant on the success of the freight operation and somewhat in the unspecified future.

There are many who see this as no more than an elaborate 'land grab', and that RSP have no real intention to build an airport at all but, instead, to play at it for a year or two, decide that, after all, it wasn't possible, then undertake a building project to their own specification. Nobody can know this for sure of course but it might be noteworthy that Riveroak is a property company with no history of involvement with the aviation industry. What could their interest be in a former airport? SHP offered a 125 year lease to RSP conditional on the site remaining an aviation hub. Very reasonable I'd have thought but rejected by RSP. Quite why must be a matter for speculation. I understand that a further offer was made by SHP to sell the site for a suggested price, the only proviso being that if RSP failed to 'make a go' of the site as an airport within a certain period of time, they must sell it back to SHP for the purchase price. Again, rejected by RSP. Some might reasonably think that SHP have gone to some effort to test RSP's stated will regarding the setting up of a cargo-hub; being so tested, have they not been found wanting?