

Nationally Significant Infrastructure Project

Part 1

What is an aviation NSIP?

(1) Airport-related development is within section 14(1)(i) only if the development is—

(a) The construction of an airport in a case within subsection (2),

(b) The alteration of an airport in a case within subsection (4), or

(c) An increase in the permitted use of an airport in a case within subsection (7).

(2) Construction of an airport is within this subsection only if (when constructed) the airport—

(a) Will be in England or in English waters, and

(b) Is expected to be capable of providing services which meet the requirements of subsection (3).

(3) Services meet the requirements of this subsection if they are—

(a) Air passenger transport services for at least 10 million passengers per year, or

(b) Air cargo transport services for at least 10,000 air transport movements of cargo aircraft per year.

In this section—

“Air cargo transport services” means services for the carriage by air of cargo;

“Cargo” includes mail;

“Cargo aircraft” means an aircraft which is—

Designed to transport cargo but not passengers, and engaged in the transport of cargo on commercial terms;

So clearly the Planning Act 2008 is clear that a Nationally Significant Infrastructure Project for Aviation as submitted by Riveroak is to build a new airport for Cargo that will provide 10000 air transport movements for increasing the transport of Cargo to and from the UK and is based in England (or English waters)

Clearly the Planning Act is silent on how long after completion the airport has to achieve this goal but it would also be clearly a nonsense if achieving this took many years after completion.

Part 2

When Riveroak (RSP) submitted their application the justification that was used was that Dr Dixon had created forecasts that showed 10000 atms being successfully reached after Year 6 and this is the only place within the submission the NSIP is justified.

Clearly there would be little point in creating a new Cargo airport that just moved Cargo from one airport to another along with making people redundant in one area and employing people in another. There would be no net gain for England PLC.

Also clearly there would be little point in creating a Cargo hub that wasn't profitable (viable) however this is clearly what Dr. Dixon's forecasts are (fig 1) and she was **NEVER** asked to forecast a viable airport therefore what she produced was clearly a “wish list” without considering whether it could be sustainable over the long term and this isn't what the NSIP process was designed for.

Nationally Significant Infrastructure Project

Table 1 Summary 20 year freight and passenger forecast

	Freight moves	Pax moves	Total moves	Inbound tonnage	Outbound tonnage	Total tonnage	Passenger numbers
Y1	0	0	0	0	0	0	0
Y2	5,252	0	5,252	39,865	56,687	96,553	0
Y3	5,804	4,932	10,736	47,335	61,218	108,553	662,768
Y4	9,700	5,024	14,724	76,326	90,765	167,092	679,868
Y5	9,936	5,064	15,000	81,455	92,286	173,741	686,672
Y6	10,144	6,702	16,846	85,832	95,604	181,436	965,295
Y7	10,872	6,754	17,626	92,357	100,551	192,908	975,591
Y8	11,184	6,754	17,938	96,979	103,694	200,673	975,591
Y9	11,392	6,754	18,146	98,585	104,660	203,245	975,591
Y10	11,600	6,754	18,354	102,609	109,742	212,351	975,591
Y11	12,064	6,966	19,030	107,592	114,785	222,377	1,011,587
Y12	12,547	7,186	19,733	114,034	120,473	234,508	1,049,022
Y13	13,048	7,416	20,464	118,691	125,999	244,690	1,087,954
Y14	13,570	7,654	21,224	125,949	131,039	256,989	1,128,444
Y15	14,113	7,902	22,015	133,064	137,515	270,579	1,170,553
Y16	14,678	8,160	22,837	140,889	143,015	283,904	1,214,347
Y17	15,265	8,428	23,693	146,524	150,070	296,594	1,259,892
Y18	15,875	8,707	24,582	156,271	156,073	312,344	1,307,259
Y19	16,510	8,997	25,507	162,522	162,316	324,838	1,356,521
Y20	17,171	9,298	26,469	171,949	168,809	340,758	1,407,753

Table 1 shows a summary of the freight and passenger forecasts for the first twenty years of operation, from 2020 to 2039, following the reopening of Manston Airport. It should be noted that these forecasts are considerably more conservative than those derived by a macro level, 'top down' method. These forecast have been compiled using a 'bottom up' approach and refer to specific types of traffic. Exports are forecast to slightly exceed imports, particularly in the early years of operation.



Fig 1

Part 3

Deeper analysis of the freight forecast provided by Dr. Dixon shows that in year six the airport will reach 10144 atms carrying 181436 tonnes of cargo however it is interesting when you examine where she obtains her forecast.

In year 3 freight ATMs leap by 10% with Freight increasing by 12% and then in year 4 ATM's increase by 67% and freight by 54% whereas before and after the increases are in single figures. (Fig 2)

If the ATM's do not have this unnatural increase at years 3 and 4 then clearly the 10000 would not be achieved until year 20 (as per fig 3)

Nationally Significant Infrastructure Project

20 year summary of Freight forecast						
Source Azimuth Aviation						
Year	Freight ATM	% increase PA	Inbound	Outbound	Total Tonnage	% increase average tonne per atm
1	0		0	0	0	
2	5252		39865	56687	96552	18.38
3	5804	10.5%	47335	61218	108553	12.4%
4	9700	67.1%	76326	90765	167091	53.9%
5	9936	2.4%	81455	92286	173741	4.0%
6	10144	2.1%	85832	95604	181436	4.4%
7	10872	7.2%	92357	100551	192908	6.3%
8	11184	2.9%	96979	103694	200673	4.0%
9	11392	1.9%	98585	104660	203245	1.3%
10	11600	1.8%	102609	109742	212351	4.5%
11	12064	4.0%	107592	114785	222377	4.7%
12	12547	4.0%	114034	120473	234507	5.5%
13	13048	4.0%	118691	125999	244690	4.3%
14	13570	4.0%	125949	131039	256988	5.0%
15	14113	4.0%	133064	137515	270579	5.3%
16	14678	4.0%	140889	143015	283904	4.9%
17	15265	4.0%	146524	150070	296594	4.5%
18	15875	4.0%	156271	156073	312344	5.3%
19	16510	4.0%	162522	162316	324838	4.0%
20	17171	4.0%	171949	168809	340758	4.9%

Fig 2

Year	Freight AT	% increase	Inbound	Outbound	Total Tonnage	% increase average tonne per atm
4%	0		0	0	0	
2	5252		39865	56687	96552	18.38
3	5462				100414	18.38
4	5681				104431	18.38
5	5908				108608	18.38
6	6144				112952	18.38
7	6390				117470	18.38
8	6645				122169	18.38
9	6911				127056	18.38
10	7188				132138	18.38
11	7475				137424	18.38
12	7774				142921	18.38
13	8085				148637	18.38
14	8409				154583	18.38
15	8745				160766	18.38
16	9095				167197	18.38
17	9459				173885	18.38
18	9837				180840	18.38
19	10230				188074	18.38
20	10640				195597	18.38

Fig 3

Further the freight forecasts are further **deeply flawed** when you examine the average tonnage per aircraft movement. With reference to figure 2 although the average load does change the tonnages only vary between 17.23 (lowest) and 19.84 (highest).

Nationally Significant Infrastructure Project

The actual tonnage would then seem to be **incredibly low** when you look at past history and the reason why cargo freighters are used in the industry. Discounting Postal services the vast majority of Cargo freighters are used to transport “Just in Time” freight and perishables along with high value Medication and Electronics. Only perishables and fresh cut flowers were historically a market that Manston succeeded in attracting and many freighters arrived fully laden and departed empty (an average of over 50 Tonnes per ATM).

To use an average of only 18 tonnes per ATM is strange in the extreme and would be even stranger when you consider that Dr Dixon makes much of the loads being turned away from Heathrow and trucked to airports on the Continent simply because London airports are allegedly constrained.

The maximum load for an HGV on UK motorways is 38 Tonnes however the normal is between 25 and 35 tonnes dependent on the volume per load.

So if loads are being turned away from London airports why a fully laden HGV would be diverted to Manston just to transfer the load onto two aircraft makes no sense at all?

It does however make the justification for a Cargo NSIP easier as the 10000 is reached in year 6 but if an average load of 50 tonnes is used then 10000 would NEVER be achieved. (fig 4)

Year	Freight ATM	% increase PA	Inbound	Outbound	Total Tonnage	% increase	average tonne per atm
1	0		0	0	0		
2	1931		39865	56687	96552		50.00
3	2171		47335	61218	108553	12.4%	50.00
4	3342		76326	90765	167091	53.9%	50.00
5	3475		81455	92286	173741	4.0%	50.00
6	3629		85832	95604	181436	4.4%	50.00
7	3858		92357	100551	192908	6.3%	50.00
8	4013		96979	103694	200673	4.0%	50.00
9	4065		98585	104660	203245	1.3%	50.00
10	4247		102609	109742	212351	4.5%	50.00
11	4448		107592	114785	222377	4.7%	50.00
12	4690		114034	120473	234507	5.5%	50.00
13	4894		118691	125999	244690	4.3%	50.00
14	5140		125949	131039	256988	5.0%	50.00
15	5412		133064	137515	270579	5.3%	50.00
16	5678		140889	143015	283904	4.9%	50.00
17	5932		146524	150070	296594	4.5%	50.00
18	6247		156271	156073	312344	5.3%	50.00
19	6497		162522	162316	324838	4.0%	50.00
20	6815		171949	168809	340758	4.9%	50.00

Fig 4

Conclusion

When you strip out the verbiage, the many reports, and the forecasts this “NSIP” and the resultant application for a Development Consent Order relies completely on the Azimuth forecast for ATM’s. Mathematics can do many things but what it cannot do is prove (1) it is viable and (2) is possible to achieve 10000 ATMs without manipulating the forecast.

- HGV’s are cheaper to deliver cargo
- HGV’s would carry more tonnage than Sally Dixon’s cargo freighters

Nationally Significant Infrastructure Project

- HGV's would be less polluting to the environment and because they carry more less HGV's would need to be on the road network.

It would seem on the face of it that Dr Dixon was asked to provide an unviable forecast gamed to get an NSIP justification and when you remove all the many words written by RSP this is the only justification provided in their application.

Dr. Dixon has failed to provide any justification for 10000 ATMs and neither can she show that these ATMs would increase jobs or tonnage except by taking away those from other airports in England.

Whether the ExA has looked at the why in amongst the massive workload they took on I don't know but this is at the end of the day an application to open a Cargo Hub that the statistics do not support.