

Submission by Janet Davies

Jan 28th 2020

PINS Ref: TR020002

Objection to designation of Manston Airport as a Nationally Significant Infrastructure Project

I wish to reiterate my opposition to the opening of an airport on the site of the old Manston Airport in Ramsgate in Kent.

Manston in Thanet is an old military airport which has failed three times as a commercial cargo and passenger airport and has been shut for five years. RSP, a company with no track record of running a successful airport, is proposing to create a new 24/7 cargo hub and circumvent the planning law of the Localism Act by having it declared a Nationally Significant Infrastructure Project. RSP asserts in its application that it will have 17,000 cargo and 9,000 passenger flights a year.

All things being equal, the proposed development would never receive planning permission because of its proximity to Ramsgate, a town of 40,000 people and the objections of Ramsgate Town, Council and two out of the three most recent administrations of Thanet District Council.

In 2013, Sir Howard Davies interim report into airport capacity in the South East dismissed the expansion of Manston because of its location. The airport is 80 miles from London and situated on a headland with water on three sides. The most outlying of the five London airports is Southend at 41miles.

This is not a Nationally Significant Infrastructure Project because there is no evidence of need nor evidence that any benefits can outweigh the negative impacts.

A project can only be a Nationally Significant Infrastructure Project if it is needed.

As CAA statistics show, dedicated cargo flights into London airports nearly halved from 27,294 in 2000 to 14,035 to 2018 (See CAA statistics Appendix 1 below). The 17,000 dedicated cargo flights RSP asserts that it will achieve represents 122% of a shrinking market. But the rapid shrinkage of the cargo market indicates there is no need for new capacity in the South East.

Between 1989 when the passenger terminal opened and 2015 when it closed, numerous operators tried to lure passengers to Manston. None has succeeded. The peak was 2603 Passenger ATMs in 2004 when EUjet was operating out of Manston (See CAA statistics Appendix 2 below). The statistics show it was an anomaly. EUjet collapsed the following year and Manston never again achieved more than 1000 passenger flights per annum. Flybe and KLM subsequently both tried to sustain regular services from Manston but failed. The passenger market prefers airports which are at most half the distance from London.

A project can only be a Nationally Significant Infrastructure Project if the benefit to the community outweighs the negative impacts.

When the airport was operational, aircraft lined up over the harbour at 300m and descended across the town to the runway. There were few flights, yet safety was an issue with a number of near disasters eg. a heavily overloaded KAM Air tail scrape incident in 2010 and near misses with homes losing part or all of their roofs in vortex incidents. The Planning Inspectorate visited one of these homes and saw the press clippings from the incident. The house is near two of the schools under the flightpath. Had these incidents happened at either school during playtime, there would have been significant loss of life.

Ramsgate Town Council has registered trenchant objections to the reopening of the airport in terms of safety, air and noise pollution. The town has a lot of Regency buildings. The flightpath goes over

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one of the largest concentrations of Grade 2 listed buildings in Kent, none of which can be properly sound proofed. Herne Bay homes are also badly affected. The two towns have a combined population of nearly 80,000.

“The truth is that Manston Airport has failed over a prolonged period of time to run as a commercially successful airport. Kent County Council gave strong support to various investors but the reality of commercial aviation at Manston Airport led to significant losses. In fact, in the 16 years since it was taken into privately (sic) ownership it has incurred losses by those who have tried to operate it in excess of £100 million.” KCC Position Statement issued March 2015.

Reputable and respected aviation consultants including Falcon Consultancy, Avia Solutions, York Aviation, Altitude Aviation, all assess Manston airport as unviable. There is, however, plenty of scope to make the lives of 80,000 people miserable while a company inexperienced in aviation tries to make Manston Airport take off once again.

Manston does not qualify as a Nationally Significant Infrastructure Project as RSP has produced no evidence to suggest that the benefits will outweigh the negative impacts.

Threat to East Kent Road Infrastructure

In the unlikely event that RSP does manage to find a market for its flights, all cargo and aircraft fuel will have to be transported by road on the M2/A299 which already has capacity problems that are likely to be exacerbated by Brexit. The 35 miles of the A299 from Faversham to Manston has recurring structural problems and attempts to remedy the problems have thus far failed.

“For a number of years, large sections of the **A299** Thanet Way in North Kent have been experiencing shrinkage/heave causing significant undulations in the carriageway. This is thought to be caused by underlying London Clay swelling and contracting at different rates.... This road is also the route that lorries will take in order to park at the Manston Airport site in the event of a disorderly departure from the European Union.”¹Kent County Council funding bid to the Dept of Transport for 2019/2020.

Conclusion

The RSP proposal fails to reach the threshold of a Nationally Significant Infrastructure Project in two key respects lack of need and lack of proof that it is capable of providing benefits which outweigh the potential to significantly blight two towns with a combined population of 80,000. Furthermore, it has the potential to damage the already overloaded road network of East Kent.

Yours faithfully

Janet Davies
Ramsgate Resident

cc. Grant Shapps, Minister for Transport, Caroline Lucas, MP, Andy McDonald, MP

¹ https://www.kent.gov.uk/data/assets/pdf_file/0020/102098/A299-Thanet-Way-challenge-fund-bid-information.pdf

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APPENDIX 1

Air Transport Movements 2000
Comparison With the Previous Year

	<----- 2000 ----->		
	Total	Passenger Aircraft	Cargo Aircraft
London Area Airports			
GATWICK	252773	249352	3421
HEATHROW	460476	457416	3060
LONDON CITY	50049	50049	0
LUTON	59951	53820	6131
SOUTHEND	874	159	715
STANSTED	146660	132693	13967
Total London Area /	970783	943489	27294

Air Transport Movements 2018
Comparison with Previous Year (a)

	<-----2018----->			<-----2017----->		
	Total	Passenger Aircraft	Cargo Aircraft	Total	Passenger Aircraft	Cargo Aircraft
London Area Airports						
GATWICK	283,186	283,186	-	283,437	283,436	1
HEATHROW	480,339	477,367	2,972	476,186	473,215	2,971
LONDON CITY	78,036	78,036	-	76,612	76,612	-
LUTON	106,666	105,081	1,585	106,074	104,584	1,490
SOUTHEND	17,088	17,088	-	11,331	11,331	-
STANSTED	185,077	175,599	9,478	172,153	162,027	10,126
Total London Area Airports	1,150,392	1,136,357	14,035	1,125,793	1,111,205	14,588

APPENDIX 2

AIR TRANSPORT MOVEMENTS AT MANSTON 1972-2004
(Source data – CAA records office, Gatwick)

YEAR	TOTAL AIR TRANSPORT MOVEMENTS	PASSENGER MOVEMENTS	CARGO MOVEMENTS
1972	464	-	-
1973	480	-	-
1974	484	-	-
1975	280	-	-
1976	-	-	-
1977	75	75	0
1978	580	580	0
1979	-	-	-
1980	-	-	-
1981	442	415	27
1982	739	700	39
1983	653	636	17
1984	671	658	13
1985	709	667	42
1986	740	444	296
1987	434	168	266
1988	259	154	105
1989	352	313	39
1990	447	342	105
1991	273	86	187
1992	246	91	155
1993	282	130	152
1994	298	95	203
1995	282	52	230
1996	148	56	92
1997	130	62	68
1998	269	46	223
1999	746	46	700
2000	984	64	920
2001	937	26	911
2002	805	5	800
2003	1106	25	1081
2004	3333	2603	730