

From: [REDACTED]
To: grant.shapps@dft.gov.uk; [Manston Airport](#)
Subject: DCO enquiry into Manston Airport Ffreight Hub
Date: 31 January 2020 12:38:37
Attachments: [Cllrs Elizabeth Green and Tony Ovenden.docx](#)

The Secretary of State for Transport has [asked for comments and further information in relation to a range of matters](#) by 31 January 2020

Attached please find our concerns as District Councillors in response to the questions asked with regard to the impact on local residents and facilities, the stress placed on the uk carbon balances, and the threat of reputation damage to the SOS and/or his advisers

A response is requested if at all possible.

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The Secretary of State has asked for responses to various outstanding questions and comments regarding RSP's DCO application

This submission is intended as comment on:

Climate change and carbon emissions

late submission of Five10Twelve of 27th October 2019 which points to the inadequacies and inaccuracies in the Applicant's Environmental Statement.

Five10Twelve Late Submission 17th October 2019 Rebuttal to the Applicant's Overall Summary of Need Case

Five10Twelve of 23rd December entitled Public Cost and Reputational Risk.

The UK carbon emission targets – is there room for Manston?

The Committee on Climate Change (CCC) provides independent advice to Government on building a low carbon economy and preparing for climate change. It has recommended that the government plans for international aviation and shipping to achieve net-zero emissions by 2050 and that this should be reflected in the Government's forthcoming Aviation Strategy. The CCC states that it will be necessary to reduce actual emissions from the aviation sector. Until now, there has been a natural cap on aviation emissions due to runway capacity, if greater capacity is supported, there will be unwanted growth in Carbon emissions.

In the CCC's view, because of progress in other sectors, the aviation sector is likely to be the largest emitting sector by 2050 even with strong progress on technology and limiting demand. The committee states we must limit passenger growth to no more than 25% above today's level. The CCC also calls on the Government to assess its airport capacity strategy in the light of the issues around reducing emissions.

The planned additional airport capacity at London airports (including the third runway at Heathrow) is likely to leave very limited or no room for growth at non-London airports. Several UK airports, including Gatwick and Southampton Airports are currently pursuing plans for growth beyond the limits set by the

CCC. The AEF has shown that the Gatwick plans alone will produce increases in carbon emissions from 0.77MtCO₂ in 2017 to 0.95MtCO₂ in 2028.

The Development Control Order (DCO) examination regarding Manston examined the applicant's business plan that justified the application as being of national significance. It is obvious that an operation described as nationally significant will result in air movements that will compete for resources with other airports and air movements. The examination established that the size of the operation would account for a 1.5% to 1.75% increase in the national aviation carbon emissions.

The preliminary consultations by the applicant to prepare for the CAA's examination of its flight path proposals came to similar conclusions in terms of competing with other well established operators for the limited airspace.

In brief, approving the Manston DCO in the current and future environment of Climate Change and the future of the UK aviation sector is a zero sum game. Whatever the recommendation of the Planning Inspectorate (PINS) of the viability of the applicant's proposals, the Secretary of State needs to consider whether to allow the application

The Manston DCO application is for providing a facility for the dedicated air freight market. As such it competes with well-established freight hubs, such as East Midlands, not only for market share, but also for 1.5 to 1.75% of the aviation carbon emission limits. Dedicated air freight is in turn competing with Belly Hold freight in passenger aircraft, a much larger part of the market that requires hub airports such as Heathrow so that loads can be broken down and reassembled for onward transmission. Finally is the competition of passenger flights. We are aware of the ever increasing pressure for long haul passenger movements through hub airports. The Heathrow debate illustrates this. There is also pressure for a network of regional airports to link the regions together for economic advantage.

All of these aviation uses compete for increasingly limited resources, both for airspace and carbon emissions. **The SOS may feel that carrying fruit and veg and other specialised airfreight is not best use of those resources, especially as this market is already well served by existing providers.**

The EU 2008 Ambient Air Quality Directive – will the health impact on Ramsgate be too great?

The EU sets legally binding limits for air quality and limits for air pollutants that affect public health such as particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2). It remains to be seen if the Government will adopt these limits post Brexit. The problem at airports is compounded by the road traffic that airports attract as well as aircraft take-off and landing. There is no doubt that air pollution is a cause health problems ranging from heart attacks to Alzheimer's disease, there is some debate about how much is produced by aircraft and at what height it ceases to be a problem. In the case of Manston, the 40,000 inhabitants of Ramsgate live between 0.85 and 3 nautical miles from the runway, together with the prevailing wind direction, these arguments are superfluous. **Air pollution from the airport will depress even further the already poor health outcomes for the area with consequential cost burdens on the NHS.**

Public Safety Zones (PSZ's) and the impact on Ramsgate

According to Thanet District Council (TDC), "Public Safety Zones [in relation to the reopening of Manston Airport], would have significant implications for planning policy in the district, and would need to be addressed in the proposed review of the Local Plan, in the event that the DCO is granted. On the basis of the submitted information, 2 sites allocated for housing development in Ramsgate in the Draft Local Plan would be affected. One of these sites has current planning permission and has been substantial built out (Lorne Road), whilst the other site has planning permission for 6 dwellings and an additional 16 allocated but not covered by a planning permission (Seafield Road/Southwood Road). As well as these specific allocations, the draft plan makes provision for windfall sites (within the urban confines) to come forward with approximately 2,500 homes by 2031 across the whole district. TDC would need to consider whether a precautionary policy linked to potential future PSZ designation would be appropriate, to identify an exclusion zone for new

housing or housing conversions through such a policy, to be effected in the event that a PSZ is designated. In addition, the Council would have to consider whether an Article 4 Direction to restrict permitted development rights allowing conversion to residential use in the identified area might be appropriate in due course.”

The impact of overflying Ramsgate, so near to the runway and flight path will go far beyond the technical comments by TDC. Ramsgate has a thriving visitor economy developed over the past 5 years since the previous airport closed. In their submissions to the DCO examination, Thanet District Council, Ramsgate Town Council and other businesses and campaigners and community groups have expressed reasonable concerns, based on direct experience and knowledge of the local area, that the recent upsurge in inward investment, individuals and businesses relocating and investing in the area since the former airport was closed in 2015 is highly likely to be reversed in the event that the airport is re-opened. **These concerns are based around the reasonable and rational conclusion that businesses and individuals are unlikely to want to buy or invest in property or businesses in the area in the event that development is granted that results in cargo planes overflying properties at altitudes of 200-600 feet.** This is a high cost to Ramsgate if the DCO is granted, even in the event that the Applicant does not build an airport for whatever reason - for example failure to find funding. The loss of confidence in the area and the risk of air cargo operations commencing at some point in the future will continue to hang over the town regardless, which will have a continued negative impact on inward investment

Reputational Risk to the decision maker

The previous Secretary of State (SOS) suffered reputational damage due the quality of information provided to him regarding the competence of the operators he was asked to support.

The impact of Manston reopening as a dedicated freight hub would ensure considerable industry interest and media coverage. The quality of any decision is bound to be closely examined.

The SOS should be aware of the history of the applicant and Manston.

Manston itself has failed as a passenger and freight airfield under at least three managements; Wiggins, Planestation, and Infratil . Losses have been considerable. This is despite considerable public sector financial support from Kent County Council.

Following the latest closure, 5 years ago, Thanet District Council was approached by a group led by the previous managing director of the airport during the airports difficult history. It is easily verifiable that Mr Freudman has a long history as a failed solicitor, and failed aviation projects both in the UK and elsewhere. A market examination found no other credible interest in the project.

The group at this stage claimed backing of Riveroak Ink an American finance company. In its examination of the request to CPO the Manston site, Thanet attempted to examine the source of the claimed financial backing and commissioned expert advice on the business plan. Financial information was withheld, despite Thanet being asked to underwrite the CPO process. Aviation experts were highly critical of the business plan. The Council concluded that it could not risk public money on the venture.

A change of administration at the Council occurred with the incoming administration promising to re-examine the possible reopening of the airport. Market testing showed only Riveroak showing any interest. This time the group had lost the backing of Riveroak Inc. The Council again commissioned expert opinion, and again failed to determine the source of any funding. The new administration finally refused the request to CPO.

It's at that point that the applicant opened its request for a Development Consent Order. **There are considerable flaws in the DCO process that make it difficult for the SOS to make a decision.** The process is designed to examine applications from public utilities or other well establish companies and to balance National and local interests. Faced with essentially a **start-up company, consisting of a few individuals, registered in an offshore tax haven, and only one having any experience of the aviation industry,** the process was protracted and frustrating. The application attracted an unprecedented

number of adverse submissions from public bodies, local councils, private sector, groups and individuals.

The examination was hampered from the start by the inspectors saying that the process did not allow them to commission their own expert opinion or to examine the applicant's business plan or to consider the source of funding including money laundering regulations.

This meant that concerned individuals had to commission their own research. Many did, including a re-examination of the applicant's claims regarding flight paths and noise contours.

We hope the DCO inspectors have made the SOS aware of the flaws in the process they were asked to conduct and the precedents set for future possible applications if it is not reviewed.

In the meantime we believe a decision to approve this application would place the SOS at considerable reputational risk. An applicant with no experience in running a major freight hub, based in an offshore tax haven, with no identifiable funding, no airlines or freight handlers on board.

There must be a suspicion of attempted land banking for future housing development at best, or money laundering at worst.