

From: [REDACTED]
To: [Manston Airport](#)
Subject: Request for Comment and Further Information - DCO Application to Re-open Manston Airport
Date: 31 January 2020 23:49:03
Importance: High

For the personal attention of : Susan Anderson

Head of Transport Infrastructure Planning.

Dear Madam,

Just how courageous is your Minister ?

I write in response to the Department of Transport's Request for Comments and Further Information, dated 17 January 2020. I have submitted evidence, previously, on the subject of illegal air pollution.

The DCO recommendation has been made by PINS, and now the Secretary of State seeks the views of interested parties, on a wide variety of issues before announcing his delayed decision. One assumes, therefore, my response, as an interested party, will be read in the Minister's office. I would greatly appreciate confirmation of this, please.

The Minister will not, understandably, wish to be seen to 'get in the way' of commercially driven risk takers, or competition. No doubt the incumbent Minister will also wish to reinforce his abiding interest in aviation and be seen as a reliable ally of the industry.

However, the Manston application is uniquely different from the other privately pursued aviation DCOs applications, which stand in line behind it, in that the applicant, River Oak Strategic Partners Ltd (RSP), is an offshore company with unproven financial status and no experience in aviation, less several airport failures 'racked up' by one of its [REDACTED] directors !

The Minister would be well advised to save his reputation on this glaringly weak DCO application to re-open Manston airport, and secure his legacy as a 'force for good' in the aviation world , by supporting the applications from more reputable and successful businesses, in RSP's wake. I am reliably informed there are 6 or 7 such opportunities for him to consider and possibly approve, in the pipeline.

Moreover, one assumes the Minister will not wish to risk repeating the debacle of his predecessor the Rt Hon Chris Gayling MP, whose attempt to bestow a contract on Seaborne Freight, a company which had no ships, no shipping experience and no accredited financial status, will be remembered for many years to come and define that particular Minister's legacy for time immemorial.

So why is Manston so fraught with reputational risk? Seven very good reasons:

1. A recommendation in favour of the DCO will undoubtedly lead to a judicial review, which the Minister could lose, if his decision is found to be unjustified in the face of such overwhelming factual evidence against

a largely fictional application. Such a review will present the Government with much adverse publicity, especially against a backcloth of clamouring public support for climate control. The recent Government decision to support Flybe Aviation refers.

2. This DCO application has been submitted purely to overcome local opposition, local difficulties, such as noise and air pollution, and to circumvent local government legal advice, which has been consistently against. As such, the application is at odds with this Government's abiding principle, as enacted by the Localism Act 2011, for such decisions to be taken locally, by locally elected representatives.

3. Manston is an unsustainable airport in every regard. As such, it will waste the Government's scarce national carbon budget, which could be used to greater effect elsewhere.

4. A DCO decision in favour of Manston will attract the unwanted attention of several national campaign organisations, such as the Aviation Environmental Federation, whose main focus is the non-sustainability of airports. As a member of AEF, I am assured they will shine their light into in the three areas they have already written subject position papers on; noise, air pollution and climate control. Notably, Client Earth has just been given permission by the high court to sue a Minister for overturning evidence based advice on pollution, and environmental lawyers have previously inflicted three such defeats on ministers over their failure to tackle air pollution.

5. Moving goods by air freighters is proven to be the most 'carbon inefficient' way of all, to move freight. Manston can **only** succeed as an airport if it manages to 'rob' trade from other more carbon efficient air movers (ie. belly hold). Does the Minister really want to be held responsible for creating **more** carbon per kilogram of freight moved ?

6. Successful freight movement is dependent on night flying, mainly to meet the growing demand for 'next day delivery'. East Midlands airport has no such restrictions and therefore remains the best option for freight movement by air. Manston will always face opposition to night flying from Thanet residents, and indeed, local opposition has only been muted, in recent years, by statements made by prominent public figures, designed to mislead them on this critical subject. The perceived lack of public outcry will change very quickly, when the truth will out.

7. The alternative 'mixed use' for Manston, as put forward by the previous owners, retained an airstrip for recreational and heritage flights, thereby supporting many of the aviation skills that the Minister is so interested in keeping for the nation's prosperity. A small airport, retained for light aircraft, would be very much more in keeping with the area's history, culture, indigenous skills **and** the Minister's renowned interest in General Aviation, than a busy 24/7 'industrial scale' freight hub for the predominantly robotic operation of dirty, super jumbo freighters and 'tear down' facilities. Moreover, if the Minister takes the only sensible decision to deny this DCO application, the alternative

light aircraft airport at Manston would enjoy universal support, locally. The general aviation skills, thereby retained, would play an important role in Thanet's real economic recovery to be built on its natural beauty, tourism, recreation and high tech jobs. Moreover, more general aviation expertise such as this, would have a much greater chance of survival, well into the future, than would a thrice failed environmentally damaging commercial airport.

So, it is clear that on this occasion, by supporting this DCO application, the Minister would quickly invite very bad publicity, promote the advent of yet another failure in aviation and fail to protect the long term interests of the very aviation assets he has spent considerable personal time and effort to sustain.

Why do that, when much better opportunities and more viable options for him to support, are close behind ?

Yours sincerely,

Grahame Birchall

Resident of Ramsgate.