



18th June 2021

Ref:

Dear Sir,

I note that in accordance with rule 20(2) of the Infrastructure Planning (Examination Procedure) Rules 2010 the Secretary of State (SoS) is inviting further representations for the purposes of his re-determination of the application.

You will recall that Andrew Stephenson MP, on behalf of the SoS, concluded that the demand for air freight could not be met by existing airports; *'there is a clear case of need for the Development which existing airports (Heathrow, Stansted, EMA and others able to handle freight) would not bring about'*. The Minister further concluded *'that significant economic and socioeconomic benefits would flow from the Development to Thanet and East Kent as well as more widely'*. These assumed benefits, of course, would only arise if Manston were to be a successful venture.

Any determination by the SoS will still need to recognise that the key finding of the Examining Authority was that the applicants had failed to provide sufficient evidence that the development met the criteria of 'proven need'. Given that the key assumption of the Minister's decision is based on the premise that demand for aviation freight (both belly hold and dedicated cargo) would increase beyond existing capacity this conjecture would still need to be examined in detail.

Aviation demand has been radically affected by the spread of the Covid virus and its subsequent variants. This has impacted heavily on travel and aviation in particular, and will markedly alter peoples travelling behaviour for both holidays and business. We, as a nation and as a part of the global community, are only just seeing the effects of this alteration in demand and the consequences for airlines and airports.

I think it is too early to be able to sensibly anticipate the outcome that Covid will have for wider aviation infrastructure. The independent assessor to be appointed by the SoS will only have recent and partial information regarding patterns of demand that could, in themselves, quickly change depending on factors such the success of vaccinations globally or the spread of new mutations.

The assumption that existing airports would not meet demand was the key justification for the Minister to overturn the recommendation by the Examining Authority. It is unlikely that any new determination will be able to satisfactorily

conclude in favour of the application on the basis of available information. On that basis I recommend the Secretary of State should either; a) reject the development application in the likely absence of any credible evidence as to the actual need for such a development, or b) postpone any redetermination till such time as there is quantifiable and robust data available to determine future demand and the consequences for UK aviation infrastructure.

Yours faithfully,

Mark Heverin MCILT