

Dear Sir / Madam

Four experienced and incisive Inspectors spent a year forensically interviewing and questioning witnesses and evidence put before them. They deliberated long and hard before writing their report after diligently sifting through all the facts and coming to their conclusion. The Examining Authority's considered recommendation was that the Secretary of State should **not** grant development consent.

Surely the Government should listen to the Inspectorate who have spent so much time, and public money, on scrutinising this application. The findings, conclusions and recommendation wasn't 'on the fence', it was damning as shown here colour coded for clarity! There was only one area which was positive, all the others were either neutral or weighed against the proposal.

### **Manston Airport Examining Authority's Report of Findings and Conclusions and Recommendation to the Secretary of State for Transport**

[TR020002-005347-TR020002 Final Recommendation Report to DfT.pdf](#)  
([planninginspectorate.gov.uk](http://planninginspectorate.gov.uk))

## **11. SUMMARY OF FINDINGS AND CONCLUSIONS**

**RECOMMENDATION 11.3.1. For all of the above reasons and in the light of its findings and conclusions on important and relevant matters set out in this report, the ExA, under the procedures set down in the PA2008, recommend that the SoS should not grant development consent.**

### **On NEED**

**Given all the above evidence, the ExA concludes that the levels of freight that the Proposed Development could expect to handle are modest and could be catered for at existing airports (Heathrow, Stansted, EMA, and others if the demand existed). The ExA considers that Manston appears to offer no obvious advantages to outweigh the strong competition that such airports offer. The ExA therefore concludes that the Applicant has failed to demonstrate sufficient need for the Proposed Development, additional to (or different from) the need which is met by the provision of existing airports.**

## **11.2. CONSIDERATION OF FINDINGS AND CONCLUSIONS**

11.2.1. We consider that the application fulfils the relevant legal requirements including the UK Government's relevant international obligations.

11.2.2. Following Regulation 63(5) of the Conservation of Habitats and Species Regulations 2017, the ExA concludes that it is required to **recommend refusal** to the Secretary of State as the competent authority for the decision as to whether to grant development consent.

11.2.3. The ExA concludes that the Applicant has **failed to demonstrate sufficient need for the Proposed Development**, additional to (or different from) the need which is met by the provision of existing airports, and this weighs against making the proposed Order.

11.2.4. The ExA concludes that there are impacts of the Proposed Development in terms of **air quality** which are **neutral** in any consideration of making the proposed Order.

11.2.5. The ExA concludes that there are impacts of the Proposed Development in terms of **biodiversity** which are **neutral** in any consideration of making the proposed Order.

11.2.6. The ExA concludes that there are impacts of the Proposed Development in terms of **climate change** which **weigh against** making the proposed Order.

11.2.7. The ExA concludes that there are impacts of the Proposed Development in terms of **ground conditions** which are **neutral** in any consideration of making the proposed Order.

11.2.8. The ExA concludes that there are impacts of the Proposed Development in terms of **heritage and archaeological assets** which **weigh against** making the proposed Order.

11.2.9. The ExA concludes that there are impacts of the Proposed Development in terms of **landscape and visual impacts** which are **neutral** in any consideration of making the proposed Order.

11.2.10. The ExA concludes that there are impacts of the Proposed Development in terms of **noise** impacts which **weigh against** making the proposed Order.

11.2.11. The ExA concludes that there are impacts of the Proposed Development in terms of **operational issues** which **weigh against** making the proposed Order.

11.2.12. The ExA concludes that there are impacts of the Proposed Development in terms of **socio-economic impacts** which **weigh in favour** of making the proposed Order.

11.2.13. The ExA concludes that there are impacts of the Proposed Development in terms of **transport** which **weigh against** making the proposed Order.

11.2.14. The ExA concludes that there are impacts of the Proposed Development in terms of **water quality** which are **neutral** in any consideration of making the proposed Order. It concludes that there is no conflict with the Water Framework Directive.

**11.2.15. The ExA concludes, therefore, that on balance the benefits of this proposal would not outweigh its impacts.**

11.2.16. The ExA has considered the requests for powers to compulsorily acquire land and rights which formed part of the application. **The ExA concludes that the requests for powers do not meet all the tests set out in statute and in guidance.**

11.2.17. In reaching this conclusion the ExA has had regard to the HRA1998 and consider that the interference with rights is not proportionate and in the public interest.

**11.2.18. On the request for CA, the ExA concludes that it cannot be satisfied that there is a compelling case in the public interest for the land and rights over land to be acquired compulsorily.**

**11.2.19. In reaching this conclusion the ExA has had regard to the HRA1998 and considers that the interference with rights is not proportionate and not in the public interest.**

11.2.20. The ExA has considered whether plots defined as open space satisfy the relevant conditions under s132 of the PA2008 and concludes, taking account of all the evidence that was submitted, that the Order Land, when burdened with the Order right, will be no less advantageous than it was before.

**11.2.21. In respect to Crown Land, the ExA concludes that in the absence of any statement submitted to the Examination that the appropriate Crown Authority consents to the acquisition, the request for CA in respect of four Crown Authorities be refused and that any provisions relating to these Crown Authorities should not be included in any final DCO should it be made.**















**11.3. RECOMMENDATION 11.3.1. For all of the above reasons and in the light of its findings and conclusions on important and relevant matters set out in this report, the ExA, under the procedures set down in the PA2008, recommend that the SoS should not grant development consent.**

It is so clear in colour – so why did the Secretary of State completely ignore and overturn this recommendation? Was there undue political pressure or incentives?

# TR020002: Manston Airport

## Funding – where is the money?

RSP have various limited companies but their accounts show them to be in overall debt.

 Riveroak AI Limited Calder & Co 30 Orange Street, London, WC2H 7HF	ACTIVE	Other	Confirmation Statement Submitted 11 Months 13 Jul 2020	
 Riveroak Fuels Limited Calder & Co 30 Orange Street, London, WC2H 7HF	ACTIVE	Other	Confirmation Statement Submitted 9 Months 1 Sep 2020	
 Riveroak Investments (UK) Limited Albany House Claremont Lane, Esher, Surrey KT10 9FQ	DORMANT	Other	Confirmation Statement Submitted 1 Month 7 May 2021	
 Riveroak Manston Limited Calder & Co 30 Orange Street, London, WC2H 7HF	ACTIVE	Other	Confirmation Statement Submitted 11 Months 20 Jul 2020	
 Riveroak Mse Limited Calder & Co 30 Orange Street, London, WC2H 7HF	ACTIVE	Other	Confirmation Statement Submitted 5 Months 23 Dec 2020	
 Riveroak Operations Limited Calder & Co 30 Orange Street, London, WC2H 7HF	ACTIVE	Other	Confirmation Statement Submitted 10 Months 20 Aug 2020	
 Riveroak Strategic Partners Limited Calder & Co 30 Orange Street, London, WC2H 7HF	ACTIVE	Other	Accounts Submitted 15 Days 8 Jun 2021	

## Accounts as of 30.6.21

Riveroak AI Limited incorp. 8/7/2016 Total Assets £0 Total Liabilities **£-144.88k** Net Assets **£-144.88k**

Riveroak Fuels Limited inc. 24/8/2018 Total Assets £2.62m Total Liabilities **£-4.81m** Net Assets **£-2.2m**

Riveroak Investments (UK) Limited inc. 24/4/2019 Total Assets £1k Total Liabilities £0 Net Assets £1k

Riveroak Manston Limited inc. 19/7/2016 Total Assets £5 Total Liabilities **£-4.7k** Net Assets **£-4.7k**

Riveroak Mse Limited Inc 10/12/2018 Total Assets £16.65m Total Liabilities **£-17.48m** Net Assets **£-833k**

Riveroak Operations Limited Inc 4/8/2016 Total Assets £909k Total Liabilities **£-15.87m** Net Assets **£-14.96m**

Riveroak Strategic Partners Limited inc 8/7/2016 Total Assets £37.54m Total Liabilities **£-37.59m** Net Assets **£-45k**

## Across all companies

- Total Assets £ 57,720,005
- Total Liabilities **£ - 75,899,580**
- Net Assets **£ - 18,187,580**

During the Planning Inspectorate Hearings RSP refused to disclose the names of their supposed investors. All that was made available is the fact that these investors are based in the offshore tax haven of Belize.

No business plans have been made public, despite requests from the Inspectors, yet these mysterious benefactors are supposed to have pledged £300 million to develop a 'state of the art, green airport' completely from scratch. £300 million seems a derisively small amount for what they have planned.

In addition, this money was apparently pledged several years ago and things have now changed with Brexit, Covid, etc. How do we know that this financial backing is still available?

Previously, on not one but two occasions, Thanet District Council gave Riveroak the opportunity to prove their financial credentials in order to become an indemnity party with them. Neither time could, or would, RSP give the Council sufficient reassurance that they had the wherewithal to fund a, more modest, airport development.

The Secretary of State should know who the investors are and have oversight of the business plan and funding streams before making any decision.

**From:** [REDACTED]  
**To:** [Manston Airport](#)  
**Subject:** For the attention of the Manston Airport Case Team  
**Date:** 07 July 2021 13:12:56  
**Attachments:** [Viabilityand sof market tests for Manston Airport - all negative.docx](#)

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Dear Sirs,

Please find my submission in regard to the Manston Airport decision – attached as a Word document too.

## **Reports and Studies showing Manston Airport's lack of Need and Viability**

Several Reports, Feasibility Studies and Soft Market Tests over the years have all dismissed Manston Airport as being neither a viable nor successful proposition. It is simply in the wrong location and has a consistent record of commercial failure. After the RAF left Manston, various companies tried to make a go of it commercially and all promptly failed and went bust, these companies included Wiggins, Planestation and Infratil. Despite several attempts, this airport, on the farthest Eastern corner of Kent and surrounded by sea on three sides, was just not able to attract a sufficient amount of business. There is no fuel supply to the airport, fuel has to be trucked in at greater expense, both financially and environmentally, which then has to be passed on to the airline companies in higher tariffs. In addition, two attempts by Riveroak Strategic partners (or RiverOak Investment Company as they were then) failed to provide 'comfort' to Thanet District Council, under two different administrations, that they had the financial or business acumen to run the airport.

The following reports all demonstrate that Manston is simply in the wrong place, doesn't have the infrastructure and that there is capacity elsewhere at better located airports;-

- **Dept of Trade & Industry** - A 1993 report by the Dept of Trade & Industry examined runway capacity in the South East of England and found Manston **unsuitable for development as a major airport because of its proximity to a town.** [Manston Airport - Wikipedia](#)
- **Davies Report – Manston was dismissed early in the search for additional South East runway expansion for being too remote.** The current situation, post-pandemic; Davies insisted that if a new runway was needed in the southeast it must still be at Heathrow. However, asked if he was still in favour of the project, he said: "I would have to redo the numbers to see if the economics made sense. [Heathrow expansion thrown off by pandemic | News | The Times](#)
- **Thanet District Council** twice rejected Riveroak (RSP), under two different political administrations, due to their lack of transparency, missed deadlines and lack of financial credentials as documented below;-

### **11th December 2014 - Agenda & Minutes of the Extraordinary Cabinet, Thanet District Council**

*Cabinet considered a report back on the soft marketing exercise that officers had been tasked to undertake in order to determine the possibility of finding an indemnity partner if Council was to opt for CPO route for the Manston Airport site. The meeting heard that **the Council had made every effort to work constructively with Party A [RSP] including making several deadline extensions for submitting the information requested from potential indemnity.***

*Cabinet noted that the Section 151 Officer and the other statutory officers had reached their conclusions after fully considering what had been put forward and the implications. The*

method of analysis and the conclusions are also backed by Counsel's Advice. The Council had entered into a confidentiality agreement with Party A [**RSP**] which was specifically requested by them.

Cabinet therefore noted the following four points in particular:

1. **There was no stage-by-stage funding for a CPO.** Unless the investment was in place, the prospects of a CPO were much diminished.
2. The new ownership of the site made it more difficult to mount a successful CPO argument.
3. The Council wanted to see a thriving, viable airport. Given all the past unsuccessful attempts to do this, **a long-term business plan was simply an essential requirement. (RSP would not provide anything more than a 5-year plan)**
4. Neither Government nor the County Council had come forward with any financial support to help the Council deal with this major project.

Cabinet agreed not to put at risk council taxpayers' funds and not to adopt an indemnity partner which carried uncertainty.

**Agreed that - no further action be taken at the present time on a CPO of Manston Airport, on the basis that the Council has not identified any suitable expressions of interest that fulfil the requirements of the Council for a CPO indemnity partner and that it does not have the financial resources to pursue a CPO in its own right.**

Full Report here - [Agenda for Cabinet on Thursday, 11th December, 2014, 7.00 pm - Thanet](#)

#### **29th October, 2015 - Agenda and minutes of the Extraordinary, Cabinet,**

The meeting was advised that a number of meetings were held between representatives of RiverOak and Thanet District Council (TDC) to assess whether progress had been made in moving towards an agreed position regarding the indemnity partnership arrangement between the two organisations.

During these discussions, the Council sought advice from specialist barristers with experience in handling development planning and Compulsory Purchasing Order cases. The fundamental issues TDC wanted to ensure were addressed were that any viable CPO indemnity partner needed to present to Council verifiable evidence that they had in place adequate financial resources to support the CPO process to its conclusion and that Manston Airport would become operational as an airport as soon as was realistically possible at no residual cost to Council.

**Cabinet noted that whilst some evidence was presented to TDC by RiverOak, not all key financial evidence was submitted to Council for verification to ensure that a successful CPO process could be pursued by Council and RiverOak. They also observed that the information presented to TDC by RiverOak as evidence towards fulfilling the requirements of the Government Circular 06/2004 to justify the public interest to be derived from carrying out a CPO as measured against the current Manston Airport land-owner plans for the site was**

*inadequate* as highlighted in the Cabinet report.

*Cabinet concluded that it was important to note that the purpose of the meeting was to make a decision based on the evidence presented to TDC by RiverOak whether at the present time RiverOak could be considered a suitable CPO partner.*

1. **That having reviewed its position, details of which are contained in the Cabinet report, that no further action be taken at the present time on a CPO of Manston Airport, on the basis that RiverOak do not fulfil the requirements of the Council for an indemnity partner;**
2. **To note that this is the second time that RiverOak have not fulfilled the requirements of the Council for an indemnity partner.**

**Full Report here** - [Agenda for Cabinet on Thursday, 29th October, 2015, 7.00 pm - Thanet](#)

- **September 2016 - AviaSolutions** were commissioned by Thanet District Council when considering the future position of Manston airport.  
**Conclusion:** The airport would require significant long-term investment but would only generate a marginal return. These returns are also predicated on a large number of external variables over which the owner of Manston Airport has very little influence. It is AviaSolutions' view that based on this scenario there is no viable long-term prospect of an economically viable airport being established on the site. [Microsoft Word - AviaSolutions Final Report for TDC - Manston Airport Viability - 04Oct2017 - No Watermark.docx \(thanet.gov.uk\)](#)
- **March 2015 - Kent County Council Statement** "The truth is that Manston 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 very significant losses. In fact, in the 16 years since it was taken into private ownership it has incurred losses by those who have tried to operate it in excess of £100 million. The objective now must therefore be to make sure that we have owners who want to do exciting things on the site and that the land is not left abandoned. Surely it is now time to look at a B Plan for Manston. The driver must be to seize the best opportunity to create a significant number of new jobs and bring prosperity into East Kent. RiverOak has not managed to convince Thanet District Council that there is a viable business plan. We believe the new owners have got a credible plan and the financial ability to create substantial numbers of new jobs which will bring prosperity and economic growth to East Kent."  
[Manston-Airport-position-statement.pdf \(kent.gov.uk\)](#)
- **November 2017 - York Aviation Report commissioned by Stone Hill Park.**  
As well as the Azimuth reports which form the basis of RSP's case, we have also reviewed a number of other reports on the potential for Manston. In overall terms, we agree with Aviasolutions for Thanet District Council that there is little realistic prospect of the re-opening of Manston Airport being a commercially viable proposition. We have reviewed their original report and the more recent reports and concur with their views on the overall structure of the UK air cargo market, noting that they, unlike Azimuth, have correctly understood the implications of our 2015 work for the FTA. We do not accept Northpoint's rebuttal of the Aviasolutions work. Like Azimuth, Northpoint's work is largely aspirational without any robust evidence or analysis of the market. Northpoint, too, misinterpret our previous work for the FTA and TfL. [TR020002-000886-SHP letter to PINS re Former Manston Airport \(13.11.17\).pdf \(planninginspectorate.gov.uk\)](#)
- **June 2021 - Planning Inspectorate's Examining Authority** led by Kelvin MacDonald and assisted by Martin Broderick, Jonathan Hockley, Jonathan Manning.  
Summary of Findings and Conclusions (after a yearlong examination)  
Recommendation: For all of the above reasons and in the light of its findings and

conclusions on important and relevant matters set out in this report, the ExA, under the procedures set down in the PA2008, recommend that the SoS **should not grant development consent.**

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002\\_Final\\_Recommendation\\_Report\\_to\\_DfT.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002_Final_Recommendation_Report_to_DfT.pdf)

- **2020 - Alan Stratford Associates was commissioned by another potential, private investor.**

“More recently I carried out a feasibility study for a private investor interested in acquiring the site and re-opening the airport. The main conclusion of this study was that, whilst a small-scale freight / passenger airport might just be commercially viable, the real value was in the sale of all (or part) of the land for housing development.”

[Manston Airport DCO – Promises of over 23,000 new jobs are flawed | Alan Stratford and Associates](#)

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- **October 2020 A personal view by Peter Forbes, Director, Alan Stratford and Associates**

The key disadvantage of Manston is its remote location in the far south east of the UK, which increases the time and cost of onward trucking within the country. This is particularly important for perishable items and it is not surprising that many of the larger supermarket chains have their main distribution centres in the ‘Golden Triangle’ within the East Midlands.

[Manston Airport – A win-win scenario for the developer but not for East Kent? | Alan Stratford and Associates](#)

Can all these reports and assessments be wrong? It is a shame in some ways but Manston is not, and never will be, viable as a commercial airport.

I hope you will take these comments into account.

Kind regards,  
Mrs Ruby Starling

Sent from [Mail](#) for Windows 10



**From:** [REDACTED]  
**To:** [Manston Airport](#)  
**Subject:** For the attention of the Manston Airport Case Team  
**Date:** 09 July 2021 14:33:35  
**Attachments:** [RSP submission re policy changes.docx](#)

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Dear sir,

Please accept my response to the latest consultation in respect of the re-determination of the Manston Airport application for development consent. Attached as a Word document too.

### **Policy Changes since PINs recommended to refuse the DCO.**

Since the DCO Examination ended and the Inspectors Recommended to refuse the DCO, Thanet District Council have adopted a Local Plan. This Local Plan was long overdue, largely due to the continued debate and the uncertainty over the status of the Manston airport site.

During the Local Plan public Hearings there was a dedicated Manston airport session with evidence given from all sides. The overall feeling was, whatever the decision on the airport, whether it was aviation or not, a decision needed to be made and made quickly because the whole issue had been dragging on for years and was holding back the progress of Thanet as a whole.

Consequently, the Inspectors ruled that the Local Plan would need to be reviewed again within six months of being adopted in order to take into consideration the delayed outcome of the DCO. They also added Policy SP05 which said that Manston should remain allocated as an airport until the DCO was decided after which the use of the site should be re-evaluated.

### **The Inspectors Main Modifications**

In accordance with section 20(7C) of the 2004 Act the Council requested that the Inspectors recommend any Main Modifications ('MMs') necessary to rectify matters that make the Plan unsound, and thus incapable of being adopted. This report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. [Microsoft Word - Thanet Local Plan Report Final 22.03.20.docx](#)

### **Main Modification 12 23 New Policy SP05 Manston Airport**

Manston Airport as identified on the Policies Map is safeguarded for airport related uses. Whether or not the DCO is confirmed, the future use and development of Manston Airport and/or other policies affected by the outcome of the DCO process will be determined through the early review of the Plan.

This policy became SP07 in the Plan.

### **Thanet Local Plan Adopted July 2020 30 Manston Airport**

1.38 The Council recognises that proposals are being put forward by River Oak Strategic Partners for an airport operation at the site, through a proposed development consent order (DCO), pursuant to the Planning Act 2008. The application is before the Secretary of State for consideration and the proposals are subject to thorough scrutiny as part of this process. A DCO,

if granted, would give consent for the project in recognition of its national importance and may also include authorisation for the compulsory acquisition of land to assist in the achievement of its objectives.

1.39 If a DCO for Airport use is granted, the early review of the Plan will need to take this into account as well as its implications for other policies in the Plan and consequential land use considerations. In the event that the DCO is not granted or does not proceed, the Council will similarly need to consider the most appropriate use for the site as part of the early review.

**Policy SP07 – Manston Airport - Manston Airport as identified on the Policies Map is safeguarded for airport related uses. Whether or not the DCO is confirmed, the future use and development of Manston Airport and/or other policies affected by the outcome of the DCO process will be determined through the early review of the Plan.**

[Thanet-Local-Plan-July-2020-1-1.pdf](#)

The Local Plan is currently being reviewed and a stance needs taking over the airport site one way or another.

All the evidence, and the Inspectorate's recommendation, points towards the airport being unviable. This land could be used for something much more beneficial for Thanet.

### **Other relevant issues in the newly adopted Local Plan.**

#### **16 - Safe and Healthy Environment**

16.1 The National Planning Policy Framework (NPPF) states that the planning system should contribute to and enhance the natural and local environment. **It should prevent both new and existing development from contributing to or being put at unacceptable risk of pollution by soil, air, water or noise** or land instability, and remediate and mitigate despoiled, degraded, derelict contaminated and unstable land where appropriate. **Consideration must be given to the impacts of noise on health and quality of life from new developments**, and the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.

16.2 **Environmental pollution and impacts on human health are important issues, and the Council is keen to ensure that Thanet's environmental quality is maintained and enhanced. The following policies aim to address a number of environmental issues to help achieve this.**

#### **Policy SE01 - Potentially Polluting Development**

Development with potential to pollute will be permitted only where:

- 1) Applicable statutory pollution controls and siting will effectively and adequately minimise the impact upon existing and proposed land uses and the environment including the effects, including cumulative effects, on health, the natural environment such as significant natural and heritage assets, or general amenity resulting from the release of pollutants to water, land or air or from noise, dust, vibration, light, odour or heat; and In determining individual proposals, regard will be paid to:
- 2) The economic and wider social need for the development; and
- 3) The visual impact of measure needed to comply with any statutory environmental quality standards or objectives. 4) where there is an impact and the development is acceptable, a suitable mitigation is proposed to the satisfaction of the pollution control regimes. Permission for development which is sensitive to pollution will be permitted only if it is sufficiently separated from any existing or potential source of pollution as to reduce pollution impact upon health, the natural environment or general amenity to an acceptable level, and adequate safeguarding and mitigation on residential amenity.

## UK's Sixth Carbon Budget

Prime Minister Boris Johnson has agreed to [legislate a new target to reduce national emissions by 78% by 2035](#), following the Climate Change Committee's advice on the Sixth Carbon Budget. It builds on the UK's new Nationally Determined Contribution (NDC) to the Paris Agreement, which will see the nation [reduce emissions by 68% by 2030](#), compared to 1990 levels.

A notable inclusion in the Sixth Carbon Budget is the UK's share of international aviation and shipping emissions. Historically, the Government's emissions reduction efforts only accounted for emissions on a "[territorial](#)" basis and therefore only includes those within the UK's borders, a decision that has drawn criticism from green groups.

The new target will become enshrined in law by the end of June 2021, with the legislation set to be introduced to Parliament tomorrow.

The UK government announced in April 2021 that it will set the world's most ambitious climate change target into law to reduce emissions by 78% by 2035 compared to 1990 levels.

RSP's project proposals will not only create excessive, and never experienced before, air and noise pollution from thousands of large freighters, plus passenger and GA, and also from hundreds of HGVs daily – over 700 movements per day at the peak. Despite their claims to be a 'green' airport this only extends to airside vehicles. The thousands of freighters and HGVs will not be carbon neutral for many years to come and this decision needs to be made on the evidence and technology that is available right now.

RSP claim that they aim to capture freight from Northern Europe and to specialise in time sensitive, perishable goods. They also make great play of unloading these time sensitive goods onto trucks to take to Ramsgate Port to send along the coast and up the Thames in Hydrogen boats that haven't even yet been designed let alone produced! How long would all this loading and unloading and transferring into boats, that wouldn't even be robust enough to contend with rough seas, take! Hardly time sensitive. It is all fantasy. They just seem to say what they think people want to hear.

The fantastical estimation of the number of jobs is another point in question. There is no way that they can substantiate these hugely inflated numbers. They don't mention that their plans would reduce jobs in other sectors. By flying in goods from Northern Europe they will be reducing all types of jobs associated with cross channel road freight. Four freighters an hour overflying Ramsgate at 600 feet would decimate the burgeoning tourist and arts industries in the town.

Air travel has been severely hit by Covid. While there will obviously be a 'bounce-back' many people will feel less inclined to fly particularly after re-assessing the climate change agenda. More and more people are becoming aware of the negative environmental impact of flying and are pledging not to fly so often or find alternative means of travelling. There are several campaigns to reduce flying such as this one - [FlightFree UK | Flight Free UK](#)

As passenger numbers at major airports potentially drop off there will be more capacity for freight.

## Lack of need for additional capacity - Airport plans for expansion

Heathrow is obviously planning a third runway and Gatwick are looking to expand by bringing the Northern Runway into routine operational use. Gatwick would be able to increase the number of planes using the airport each hour; helping unlock capacity and allowing for a more efficient and resilient operation. Gatwick is at the pre-application stage for a DCO.

[gatwick\\_northern\\_runway\\_digital.pdf \(gatwickairport.com\)](#)

In fact, **every major commercial UK airport has plans to expand, with many hoping to double**

**passenger numbers by 2030.** [Revealed: every UK airport has plans to expand – AirQualityNews](#)

Thanet is a small, overcrowded, land limited district growing in population year on year. All the time the land at Manston remains reserved for aviation use Thanet's green fields and farmland are being lost to development.

The previous small, regional airport had circa 6- 8 movements per day compared to the proposed 70-80 a day. This is in no way comparable. People would not complain about an airport of the previous size reopening, but this current proposal is a completely different animal.

The noise and pollution from 75 cargo movements plus 700 HGVs daily is untenable and will drastically impact on the community, especially those of us in Ramsgate.

Thank you,  
Mrs R Starling

[REDACTED]