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To: [Manston Airport](#)
Subject: SoS/R/006 Manston - SoS Consultation July 2021 - Submission R006
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FOR THE ATTENTION OF THE MANSTON AIRPORT CASE TEAM

Dear Sirs

Please find attached our submission, (our ref SoS/R/006).

Please confirm and acknowledge receipt of this submission.

Please confirm this will be a separate and stand alone submission rather than all bundled into 1 PDF.

All the best
Jason and Samara Jones-Hall
Five10Twelve Ltd

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To: Secretary of State for Transport
% Planning Inspectorate,
National Infrastructure Planning

Date: 7 July 2021
Our Ref: SoS/R/006

Email: manstonairport@planninginspectorate.gov.uk

For the attention of the Manston Airport Case Team

1. This submission is in response to the SoSFT's call for submissions relating to the extent to which current national or local policies (including any changes since 9 July 2020 such as, but not limited to, the reinstatement of the ANPS) inform the level of need for the services that the Development would provide and the benefits that would be achieved from the Development.
2. Transport generates over a quarter of the UK's greenhouse gas emissions, making it the largest emitting sector of the economy. But rail produces around 1% of Great Britain's transport emissions, despite carrying almost 10% of all passenger miles and nearly 9% of freight moved before the pandemic. It is the only form of transport currently capable of moving both people and heavy goods in a zero-carbon way¹.
3. The white paper Great British Railways The Williams-Shapps Plan for Rail² sets out the Government's plan to put rail on the right track to support the levelling up of our towns, cities and regions.
4. Great British Railways will have a statutory duty to promote rail freight to secure economic, environmental and social benefits for the nation³. Further, the government will also set a growth target for rail freight, as has been done in Scotland, but this should not become a ceiling⁴.

¹ Para 52, Page 88, Great British Railways The Williams-Shapps Plan for Rail presented to Parliament by the Secretary of State for Transport by Command of Her Majesty May 2021. Available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/994603/gbr-williams-s-happs-plan-for-rail.pdf (accessed 7 July 2021)

² Great British Railways The Williams-Shapps Plan for Rail presented to Parliament by the Secretary of State for Transport by Command of Her Majesty May 2021. Available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/994603/gbr-williams-s-happs-plan-for-rail.pdf (accessed 7 July 2021)

³ Para 45, Page 78 Great British Railways The Williams-Shapps Plan for Rail, May 2021. Available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/994603/gbr-williams-s-happs-plan-for-rail.pdf (accessed 7 July 2021)

⁴ Para 45, Page 78 Great British Railways The Williams-Shapps Plan for Rail, May 2021. Available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/994603/gbr-williams-s-happs-plan-for-rail.pdf (accessed 7 July 2021)

5. Strategic Rail Freight Interchanges (“SRFI”)s are a key driver of rail freight growth as they ensure that rail terminals are located close to clusters of distribution centres.
6. SRFIs are caught by the National Policy Statement for National Networks.⁵ If the proposal falls within the criteria of Section 26 of the Planning Act 2008 it falls under the NSIP procedure.
7. Granted SRFIs over the past decade include the Prologis’ Daventry International Rail freight Terminal (2014), Roxhill’s East Midlands Gateway Rail Freight Interchange (2016), Roxhill’s Northampton Gateway Rail Freight Interchange (2019) and Four Ashes’ West Midlands Interchange (2020).
8. All granted SRFIs are positioned in reach of multiple seaports and/or Freeports. Some airports are located in easy reach of SRFIs, although the Proposed Development is not one of them. Freeports and airports located close to SRFIs include the East Midlands consortium, which includes the UK’s largest dedicated freight airport, East Midlands Airport⁶.
9. Tritax’s Hinckley National Rail Freight Interchange which forms part of Network Rail’s ‘F2N’ freight route between Felixstowe and Nuneaton⁷ (expected Q4 2021) and Oxfordshire Strategic Rail Freight Interchange along the M40 corridor⁸ (expected Q2/3 2022) are in pre-application stages on the Planning Inspectorate website. Felixstowe is part of Freeport East⁹.
10. SRFIs have been proposed for Colnbrook near Heathrow and Howbury in SE London, but both applications were declined. Rail Freight Interchanges have experienced difficulties in being granted planning permission in the South East. Despite the national policy, no SRFI has been built in London or the South East in the last decade¹⁰.
11. The Transport Strategy for South East (“TfSE”) identifies the need for modal shift from road to rail¹¹. Whilst TfSE explicitly refers to South East airports including Heathrow, Gatwick and Southampton, noting also the need for the TfSE to take into account the proposed expansion of Heathrow, there is not a single mention of the Proposed Development at Manston nor any consideration of the supporting transport infrastructure that may be required around it, including but not limited to any consideration of freight movements, whether by road or by rail.

⁵ National Policy Statement for National Networks, January 2015. Available online at: <https://www.gov.uk/government/publications/national-policy-statement-for-national-networks> (accessed 7 July 2021)

⁶ East Midlands Airport Consortium gains UK Freeport Status, Announced March 2021, AirCargo News. Available online at: <https://www.aircargonews.net/cargo-airport/east-midlands-airport-consortium-gains-uk-freeport-status/> (accessed 7 July 2021)

⁷ Tritax’s Hinckley National Rail Freight Interchange. Available online at: <https://www.hinckleynrfi.co.uk/> (accessed 7 July 2021) and on the PINS website at: <https://infrastructure.planninginspectorate.gov.uk/projects/east-midlands/hinckley-national-rail-freight-interchange/> (accessed 7 July 2021)

⁸ Oxfordshire Strategic Rail Freight Interchange. Available online at: <https://oxsrfi.co.uk/> (accessed 7 July 2021) and on the PINS website at: <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/oxfordshire-strategic-rail-freight-interchange/> (accessed 7 July 2021)

⁹ Announced March 2021, Freeport East. Available online at: <https://www.freeporteast.com/about> (accessed 7 July 2021)

¹⁰ Para 4.5.7 - 4.5.9 Freight, Logistics and Gateway Review, Transport for the South East, WSP July 2019. Available online at: <https://transportforthesoutheast.org.uk/publications/> (accessed 7 July 2021)

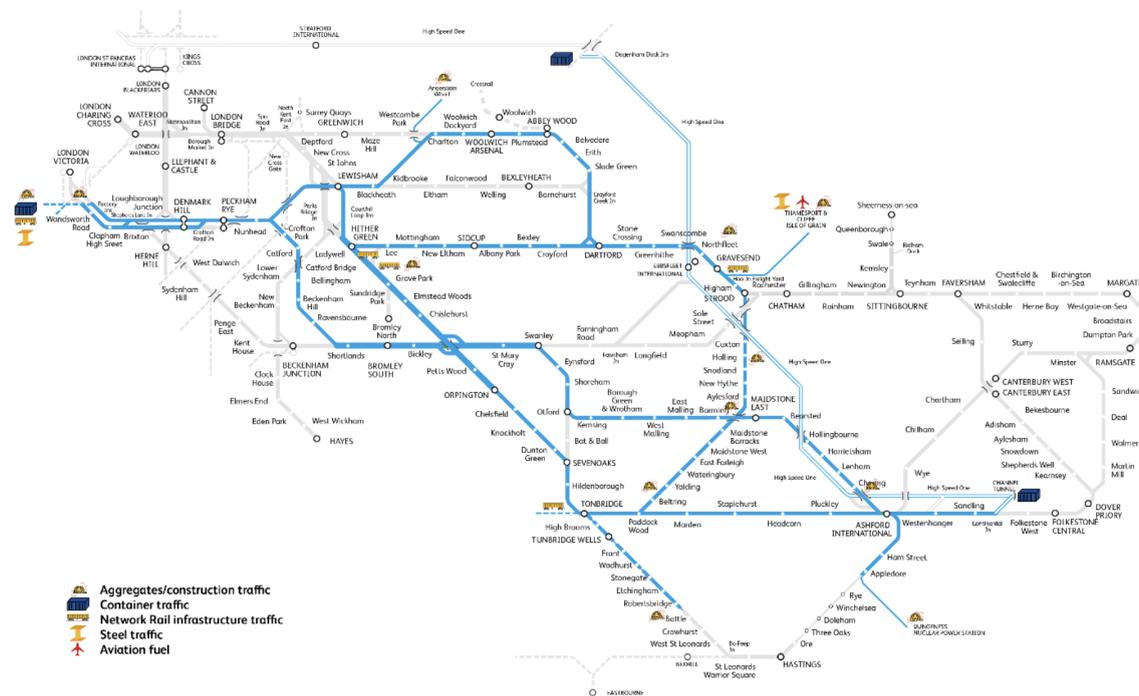
¹¹ Transport for South East, Transport Strategy for the South East, June 2020. Available online at: <https://transportforthesoutheast.org.uk/app/uploads/2020/09/TfSE-transport-strategy.pdf> (accessed 7 July 2021)

12. In TfSE's consultation response to the Freeport Consultation it states that:

“Currently, freight traffic uses some of the most congested roads in the South East area, this is particularly the case for the M25 and the A34 corridors. Our transport strategy identifies the need for modal shift from road to rail, however, the current mode share for rail is relatively low and there are many constraints limiting the scope of rail freight to expand. In some areas (e.g. Dover) the railway gauge limits the transport of containers by rail¹²”.

13. There is only one location with intermodal rail freight terminals within the South East and it is located at the Port of Southampton¹³. The Solent Freeport partners include the Southampton Airport cluster, Southampton water cluster and the Portsmouth Gateway cluster¹⁴.

14. The Applicant's Proposed Development is located in East Kent. The Kent Area Route Study, which underpins the Kent Rail Strategy 2021-2031¹⁵, clearly sets out the existing series of freight routes and terminals serving Kent. There are a small number of approved rail freight routes in Kent, providing a guaranteed number of freight paths each operating day. These are indicated in blue on the route map below. The Applicant's Proposed Development located near Ramsgate in East Kent (on the far right of the map below on a light grey line) is clearly not on or near a blue/ approved rail freight routes line¹⁶.



¹² Transport for South East response to the Freeports Consultation of 13 July 2020. Available online at: <https://transportforthesoutheast.org.uk/app/uploads/2020/09/TfSE-transport-strategy.pdf> (accessed 7 July 2021)

¹³ Para 4.5.6, Freight, Logistics and Gateway Review, Transport for the South East, WSP July 2019. Available online at: <https://transportforthesoutheast.org.uk/publications/> (accessed 7 July 2021)

¹⁴ Announced March 2021, Solent Freeport <https://www.solentfreeport.com/> (accessed 7 July 2021)

¹⁵ https://www.kent.gov.uk/_data/assets/pdf_file/0014/13811/Kent-Rail-Strategy.pdf (accessed 7 July 2021)

¹⁶ Para 10.3, Page 50/51 The Kent Rail Strategy 2021. Available online at: https://www.kent.gov.uk/_data/assets/pdf_file/0014/13811/Kent-Rail-Strategy.pdf (accessed 7 July 2021)

15. The main routes currently identified and cleared for freight operation within Kent are: - Channel Tunnel via Maidstone East to Swanley - Channel Tunnel via HS1 to Southfleet, HS1 link to Fawkham Junction, Mainline to Swanley (and then for both via Catford Loop and Atlantic Lines to West London Line) - Channel Tunnel via Tonbridge to Redhill (and then via Clapham Junction to West London Line) - Channel Tunnel via HS1 to Barking freight terminal¹⁷. None of these freight routes (in blue on the map above) are located in reach of the Applicant's Proposed Development located near Ramsgate in East Kent (in light grey on the map above).
16. The Kent Rail Strategy 2021-31 concludes that the most feasible short-term policy is to ensure the full utilisation of the existing rail freight paths, including a real and substantive increase in the use of HS1 between the Channel Tunnel and Barking freight terminal by WR12 gauge containers between Continental Europe and the UK. This would deliver at least some of the modal shift required by using existing spare capacity on HS1, which at present carries only a very small proportion of rail freight traffic through Kent¹⁸. Again, this route using the HS1 between the Channel Tunnel and Barking freight terminal (in blue on the map above) is a considerable distance from the Applicant's Proposed Development located near Ramsgate in East Kent (in light grey on the map above).
17. **Conclusion**

Given the absence of any SRFI nearby the Proposed Development, the absence of any plans to develop an SRFI within the 30 year lifespan of the Transport Strategy for the South East or the 10 year lifespan of the Kent Rail Strategy, the location of rail freight routes in Kent, it is clear that the Proposed Development at Manston would be in breach of the statutory duty set out in The Williams-Shapps Plan for Rail to promote rail freight to secure economic, environmental and social benefits to the nation.

¹⁷ Para 10.6, Page 52 The Kent Rail Strategy 2021. Available online at: https://www.kent.gov.uk/data/assets/pdf_file/0014/13811/Kent-Rail-Strategy.pdf (accessed 7 July 2021)

¹⁸ Para 10.9, Page 53 The Kent Rail Strategy 2021. Available online at: https://www.kent.gov.uk/data/assets/pdf_file/0014/13811/Kent-Rail-Strategy.pdf (accessed 7 July 2021)