

From: [REDACTED]
To: [Manston Airport](#)
Subject: Re-Determination of Application by RSP Ltd for an Order granting Development Consent for the re-opening and development of Manston Airport in Kent
Date: 07 July 2021 16:00:17
Attachments: [Written Submission to Planning Inspectorate 15-5-19.docx](#)
[Written Submission to Secretary of State for Transport.docx](#)
[Airport Case Team July 21.docx](#)

For the attention of the Manston Airport Case Team.

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Registration Identification No: 2001 4264

Original submission sent to Planning Inspectorate: 15-5-19

Amended submission sent to SoS for Transport: 31-1-20

Final submission sent to SoS for Transport: 7-7-21

Mr RP May

Written Submission to Planning Inspectorate: Re: ROSP's application to seek a DCO to re-open Manston Airport as a nationally significant air cargo hub (amended)

Registration Identification No: 2001 4264

Submitted 15-5-19

Mr Raymond May

I am representing myself and my wife

Weakness of Business Case

First and foremost ROSP apparently lacks an understanding of the geographical fact that Manston's position, situated at the extreme eastern tip of Kent, with sea on three sides and where transport exiting from the site to London and beyond can only go in one direction, westwards. Its potential competitors in the cargo freight market, Heathrow, Stansted, Luton and East Midlands, are centrally located and are therefore better able to export and import freight, coming from and going to national destinations, over much smaller distances and at a cheaper cost.

Azimuth Associates under Dr Sally Dixon, claim there is a national need for a dedicated cargo airport in SE England and that the London airports have no spare capacity to meet a growing need of the air cargo market. These claims have been challenged by many other aviation experts. In essence, RSP has submitted a case that Manston is the only viable option to making up for the predicted shortfall in air freight business capacity over the next 20 years (a claim made by RSP). In its conclusion it says: "that the UK cannot afford to lose one of its long- serving and strategically significant airports." Well, the facts do not support these assertions. The airport has been closed for 5 years. *[now 7 years in by May 2021]* The former owners, Infratil, a NZ company with assets of just under one and a half billion pounds (2016/17) and a capital investment of 70 million, have a long experience in transport (1). They own Wellington airport and used to own Lubeck airport in Germany, in addition to Glasgow airport. They could not make Lubeck, Glasgow or Manston airports, return a profit. They could have invested in Manston and tried to expand but obviously acted on wise counsels that it would not be feasible. (Both Glasgow and Manston were reportedly offloaded for £1!). RSP also ignores the facts that the dedicated airfreight business has been in decline for a long time. The majority of freight is carried in belly-hold passenger aircraft. Those airports that specialise in airfreight: Stansted, Luton and East Midlands, are well established, have the infrastructure in place and, above all, are in close proximity to where the cargo is going or coming from. Moreover, those airports can manage night flying as there are few people living under their flight paths: Stansted's nearest conurbation is Harlow, 16 Kms from its runway. East Midlands airport has no conurbations under its flight path and only Luton's extreme southern edge is under the flight path of its airport. In comparison, Manston has large populations under its flight path in nearby south Ramsgate and other smaller village populations nearby. RSP have conveniently ignored evidence from nationally commissioned studies on the future airport capacity in SE England. Apparently, "Manston airport is a regional and national asset." But few people seem to support RSP's view. Not least, the air industry, who failed to put in a bid when the airport was auctioned; nor the government who didn't even mention this "national asset" in the Southeast Airport Enquiry. In regard to Azimuth Associates assertion, that the London airports have no spare capacity to meet a growing need of the air cargo market, they disregard the fact that Heathrow, the largest freight handler in the country, is to massively expand its capacity with a third runway in the near future. Stansted Airport's CAA data (See table A) on cargo tonnage and ATM's show fluctuations in cargo tonnage with no steady increase over 2016, 2017, 2018. The ATM's show an upward trend over the same period indicative of an increase in passenger traffic. The data demonstrates the fact that Stansted has spare capacity. Moreover, the head of business and cargo aviation at MAG (the operator for Stansted), Conor Busby, Speaking in October 2017, was confident that, "Stansted has potential to meet up to half of London's capacity shortfall over the next few years, and cargo will contribute towards this growth." (2). Stansted has an established trade in importing perishable produce from Africa, a trade that Manston had before and would rely on in the future, and so would be in direct

competition with Stansted. RSP's claims and forecasts are highly unrealistic and inflationary. In its submission RSP makes a false assumption in its master plan that freight tonnage/flights will rise inexorably over the next 20 years with not a blip in sight! If you examine the operational data from all the main London airports and, in particular, the dedicated airfreight businesses at Stansted, Luton and East Midlands, the tonnage figures vary on a regular basis and do not follow the Manston pattern suggested by RSP. (See table B). The most damning criticism of Azimuth Associates is reserved for its forecast of future freight tonnage at Manston. After just 2 years it states that there will be 97,000 tonnes, 43% of Stansted's 2016 tonnage and nearly a third of East Midlands tonnage. Then it says that after 10 years of operations it will handle 212,000 tonnes, 95% of Stansted's tonnage and 71% of East Midlands tonnage. Then by year 20 Manston has now one and a half times more tonnage than Stansted (341,000 tonnes to 223,000) and 114% higher than East Midlands (300,000). Where is this massive increase in air cargo coming from? Its main competitors have advantages galore- central locations, established infrastructure, long standing business connections here and abroad, investors to hand and fewer restrictions on night flying (3).

Next let us examine RSP's financial background. RSP's plans would require an investment of 300 million pounds to fulfil its aim of a nationally significant freight hub, and that they themselves would fund it. So here we have a company with no experience in the transport industry, (apart from one of the 6 directors), Tony Freudmann, whose c.v. mentions his involvement with the failed Planestation project, and capital infrastructure involvement at Lahr airport where no evening or night flights are allowed; and Cuneo airport that suffered a fall of 109,000 passengers in 2015. The inspectorate are well aware of moves by SRSP to withhold investor names and details. RSP have not been open and transparent in revealing their sources of income, balance sheets and financial company information. It comes as no surprise therefore that, Avia Solutions, one of the world's leading aviation advisors, with 15 years experience in the sector, and whose clients include a range of major airports and airlines, concluded that RSP's submission did not put forward a creditable case, nor provide evidence to change its views on the financial viability of Manston airport (3).

Consultation Flaws

The consultation by RSP has been selective, both in the locations covered and information conveyed in a confused manner in terms of environmental impacts, in particular night flights, fuel delivery system and effects on road traffic. The delivery has often been aggressive when they have been challenged from the floor. The impression one had was that they wanted to emphasise all the advantages of easy access to passenger flights to Europe for locals to win them over, but were rather coy about laying down the environmental impact of tens of thousands of ATM's on the people of Ramsgate, local villages and parts of Herne Bay. Where it was raised, the trite response was that we have it all covered with our mitigation plans.

Environmental Impacts

The environmental impact of a 24/7 cargo hub as envisaged in this application is massive. The two main effects being noise and air pollution. Firstly I shall deal with noise pollution. The PEIRs in the RSP document section convey an impression that relatively few people would suffer from noise and air pollution resulting from a fully operational airport. My wife and I have lived in St Nicholas-at Wade throughout the period when Manston was used for freight and passenger flights. The village is directly under the western flight path at 4.4 Km from the runway. My sleep was always disturbed during any night flights that occurred. The type of aircraft made no difference, as did the decibel count. You cannot make a scientific claim that certain "low quota" aircraft will not disturb peoples' sleep, nor can you draw lines on a map indicating certain noise levels, and then say people living outside that area will not be affected. (see night flight disturbance- personal evidence as an attachment). This relates to two years 2010/11 when there were 1,151 ATM's in 2010 and 1,472 ATM's in 2011 (4). After 5 years Azimuth Associates are forecasting over 9,900 ATM's, after 10 years the forecast is over 11,600 ATM's and 17,171 ATM's after 20 years(5). Mitigation by insulation or altering flight paths cannot eliminate sleep disturbance. Furthermore, we could clearly hear every reverse thrust of jet aircraft landing at the western end of the runway at 4.5 km away. This noise will be much louder in Minster, Cliffsend and south-western parts of Ramsgate, all closer than

St. Nicholas. Summers are getting hotter and windows and doors remain open for longer to provide relief. Day flights affecting the quality of life should also not be overlooked as it impacts upon the enjoyment of one's garden and other outdoor pursuits. Just under 900 people live in St. Nicholas and I suspect that their fears have not been given a proper airing at the open floor hearings. We moved to Minster in October 2016, living at the extreme southern edge of the village. (1.86 Km south-southwest of Manston's western runway). We, along with 3,780 (8 years since the last census) Minster residents, will be adversely affected by noise and air pollution caused by the proposed 28,000+ ATM's that RSP claim will be operating after 20 years. Minster's boundary is just 600 metres south-west of the western end of the runway. The whole of Minster is within 2 Km of the runway. Thanet District Council's Draft Local Plan 2031 (6) has 250 (750 people) houses earmarked for the Northern end of the village, the northern edge of which would be just 250 metres from the flight path. In addition, a further development of 130-140 houses (400 people), east of Tothill Street, is planned, starting just 600 metres from the flightpath (7).

Further to the effects of night flying, 59% of dedicated cargo ATM's at East Midlands airport are at night. There were 19,357 freighter ATM's. This makes 11,420 night ATM's, or 31 per night.(8) There are no large urban areas near the runway, unlike Manston where the south of Ramsgate, lying under the flight path, has tens of thousands of people (the area starts at 1.2 Km (Nethercourt) to 4.2 Km from runway at Ramsgate sands(7). The type of freight trade envisaged by Manston, long distance from Africa, would inevitably result in regular night flying and with 70% of flights to and from the eastern side of the airport would harm the residents of this area in terms of noise, air pollution, sleep deprivation and mental well-being. There are other populated areas that the examining authorities may not be aware of which are close or adjacent to the Manston site. (see table C). They include: St Nicholas-at-Wade, Minster, Cliffs End, Manston, Monkton. The first mentioned is directly under the western flight path as mentioned earlier. The other four villages are all within 1.5 km of the Manston site or flight path. This amounts to over 8,000 people affected to go with the approximately 20,000 people of south Ramsgate and several thousand who live in Hillborough and Beltinge (suburbs of Herne Bay) which are under or near the western flight path of Manston. Although some 11.25 km from the runway these areas are affected by aircraft landing from the west (6). There are other potential populated areas that would be impacted from 24/7 cargo hub airport. In the Draft Thanet Local Plan (2031) the Council have seen fit to choose option 2 in opposition to the government's preferred choice of using brownfield sites. As a result, the 2,500 houses earmarked for the Manston site will now be distributed around green sites around Thanet, much of which will be grade 1 agricultural land currently being farmed for crops. Westgate, in the north of Thanet, for example, will have to accept 1,000 houses. There are numerous sites planned for new housing estates that are close to the Manston site. The largest is SHLAA 013(1,200 houses) which starts some 700 metres from the runway and are under or near the flight path). There are 16 other sites, totalling 1,658 houses to the south, south-east, east and north-east of the Manston site. Thanet District Council has submitted a local plan for 2,993 houses equating to nearly 9,000 people (3 per house) who would be subject to serious noise and air pollution. (see table D).

Tourism in Thanet, and particularly in Ramsgate, is on the upturn. Ramsgate has attracted visitors with an array of heritage assets. All this would be put at risk, both in terms of enjoyment of the facilities, but also of the very fabric of the historic buildings, by the deleterious effects of noise, vibration, pollution and visual disturbance. I shall not make any comments on the effect on biodiversity as this has been well covered by numerous organisations.

I should like to comment on the impact of increased traffic flows in and around the airport. There has not been enough importance given by RSP in relation to the impact of increased road transport on the A299, M2, A249, M20, M26, M25 (Dartford crossing area), caused by a large air freight airport. In time there will be big increases in HGV diesel vehicles driving to and from Manston serving its operational, fuelling and maintenance needs. After year 5 Azimuth's Associates' plans forecast over 19,000 diesel driven HGV's. They do not state a figure for diesel driven aviation fuel tankers necessary to supply the aircraft. After 10 years of operation the HGV figure rises to 27,400 movements, and after 15 years to nearly 42,000 movements per year, a frightening 5 per hour throughout the year (5). Over time this heavier traffic would have serious affects relating to increased

travel time, delays, air and noise pollution. Particulates from diesel exhausts are widely recognised as a very serious cause for concern for peoples' health.

Lastly, I should like to give some time to Climate Change that gets barely a mention in the raft of PEIR document on the RSP website. It states, "that a full assessment of climate change impacts has yet to be completed, and will be included in the ES." Has the ES been published? Have the Planning Inspector Team seen this ES? May I be so bold as to suggest that the evidence of Manston's operation in respect of greenhouse gas emissions should be a vital element in weighing up its proposed benefits with the damage that a very large carbon footprint would cause. So I say to the Planning Team and their superiors, how would allowing a 24/7 cargo freight hub to be built and operate in terms of greenhouse gas emissions from burning aviation fuel burnt by long distance produce-carrying transport and increased passenger flights to Europe (in preference to rail travel), sit with stricter government targets to reduce carbon emissions urgently, in the face of overwhelming evidence that the warming earth will result in a greater severity and frequency of storms, rainfall levels, droughts and sea level rises that would potentially turn Thanet into an island that it once was.

Alternative Use of the Manston Site

What RSP do not announce loudly is that is that TDC's plan for 2,500 houses at Manston, on a brownfield site, will now go on greenfield sites around the urban boundaries and adjacent to where many of their supporters live! The proposal for Westgate on sea is for 2,000 houses, double the original allocation. 2,000 houses equates to a minimum of 7,000 people which would more than double the size of the town (2011 census: 6,996)! In addition this development would be on grade 1 agricultural land. This is in contrast to the government's stated aim, to build on brownfield sites, in preference to food producing land. Stone Hill Park, the former owners, had plans for housing, a manufacturing focused industrial Park, leisure areas including a large country park, sports complex and an Olympic-sized swimming pool, and part of the runway to be transformed into an events and recreational space (9). I believe a plan similar to this for Manston would be more realistically achievable than RSP's plan, it can provide jobs and much needed housing without the threat of serious environmental harm.

Conclusion

The Secretary of State for Transport has an important decision to make. He must look at the facts. The history of Manston airport as a successful aviation business is littered with master plans that were fanciful in their projections, cost the taxpayer big time and served only to prove the one obvious truth that Manston is in the wrong location to work as the air freight hub saviour propounded by RSP. The minister and his team should carefully examine the credentials of RSP itself: A company with little or no experience in developing and operating a supportable airport. Only one of its directors has had dealings in this field and some of those have resulted in failure. The former owner's mixed development plans for the site were reasonable and measured. As part of that plan it should be made available for housing on a brownfield site, surely a sound preference. Lastly, and most crucially, the transport Minister and his team must take into consideration the overriding account of the 35,000 (this will increase substantially over the next decade) people who live, work and play under the flight path or near the airport itself. These are the people who will pay the price for the so called "national asset" operating at the economically viable level.

References:

- 1- Infratil website
- 2- Sorry but I have mislaid the web reference for this quote
- 3- Report by Avia Solutions to TDC August 2017
- 4- Night flight disturbance- personal evidence as an attachment
- 5- Table 3.7 Azimuth Associates- Manston Airport air freight forecast
- 6- Distance references from Google Maps
- 7- Thanet Draft Local Plan 2031 ref: SHLAA 072
- 8 CAA data
- 9- SHP website

Table A (source CAA)

Airport	Tonnage/ATM's	2016	2017	2018
Stansted:	Tonnage	224,312	203,746	226,128
	ATM's	164,473	172,201	184,485

Table B (source CAA)

Airport	Tonnage/ATM's	2015	2016	2017	2018
Stansted:	Tonnage	237,045	224,312	203,746	226,128
	ATM's	155,913	164,473	172,201	184,485
East Midlands	Tonnage	266,569	272,203	274,753	334,536
	ATM's	60,754	58,841	61,295	61,298
Luton	Tonnage	23,108	17,992	38,095	26,193
	ATM's	92,005	106,336	107,270	105,723

Table C- (2011 Census data)

Village	Population (2011 census)	*Distance from Runway/Flight path
St. Nicholas-at-Wade	853	4.5 km
Minster	3569	Less than 1.5 km
Cliffsend	1,822	Less than 100 m to l.t. 1.5 km
Manston	1,138	Less than 700m
Monkton	661	1.25 km

*at nearest point

Table D- Thanet Draft Local Plan 2031

SHLAA	Location	No of Dwellings	Potential Residents
013	Manston Court Rd/Haine Rd. Ramsgate	1,200	3,600
016	Cliffsend . S of Canterbury Rd	27	84
018	Haine/Spratling Rds. Ramsgate	85	
020	Opposite Eurokent Business Park/Haine Rd. Ramsgate	250	750
021	Manston Road, Ramsgate	64	132
048	Eurokent-new Haine Rd. Ramsgate	550	1,650
066	Manston Rd Industrial estate. Ramsgate	170	510
?	West of Tothill Str. Minster	250	750
072	East of Tothill Str. Minster	135	405
075	FoxboroughLane, Minster	35	105
076/078	St Nicholas at Wade	61	183
080/081/082	Cliffsend	70	210
087	Manston Rd Allotment Grds. Ramsgate	61	183
0534	Haine Farm, Ramsgate	35	105
Totals		2,993	8,979

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Registration Identification No: 2001 4264

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Mr Raymond May



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Comments in support of : Five10Twelve Ltd. Documents dated: 17-10-19; 27-10-19; 1-11-19; 19-12-19; 20-12-19; 23-12-19.

Comments in support of : Chris Lowe. Document dated: 6-1-20.

Personal testimony and facts regarding noise pollution from aircraft.

Facts that do not support a DCO to re-open Manston as a nationally significant air cargo hub

First and foremost RSP apparently lacks an understanding of the geographical fact that Manston's position, situated at the extreme eastern tip of Kent, with sea on three sides and where transport exiting from the site to London and beyond can only go in one direction, westwards. Its potential competitors in the cargo freight market: Stansted, Luton and East Midlands, are centrally located and are therefore better able to export and import freight, coming from and going to national destinations, over much smaller distances and at a cheaper cost. In essence, RSP has submitted a case that Manston is the only viable option to making up for the predicted shortfall in air freight business capacity over the next 20 years (a claim made by RSP). In its conclusion it says: "that the UK cannot afford to lose one of its long- serving and strategically significant airports." Well, the facts do not support these assertions. The airport has been closed for nearly 6 years. The former owners, Infratil, a NZ company with assets of just under one and a half billion pounds (2016/17), a capital investment of 70 million and a long experience in transport (1). They own Wellington airport and used to own Lubeck airport in Germany, in addition to Glasgow airport. They could not make Lubeck, Glasgow or Manston airports, return a profit. They could have invested in Manston and tried to expand but obviously acted on wise counsels that it would not be feasible. (Both Glasgow and Manston were reportedly offloaded for £1!). RSP also ignores the facts that the dedicated airfreight business has been in decline for a long time. The majority of freight is carried in belly-hold passenger aircraft. Those airports that specialise in airfreight: Stansted, Luton and East Midlands, are well established, have the infrastructure in place and, above all, are in close proximity to where the cargo is going to or coming from. Moreover, those airports can manage night flying as there are few people living under their flight paths: Stansted's nearest conurbation is Harlow, 16 Kms from its runway. East Midlands airport has no conurbations under its flight path and only Luton's extreme southern edge is under the flight path of its airport. In comparison, Manston has large populations under, or near its flight path in nearby south/central Ramsgate and other smaller village populations nearby. RSP have conveniently ignored evidence from nationally commissioned studies on the future airport capacity in SE England. Apparently, "Manston airport is a regional and national asset." But few people seem to support RSP's view. Not the least, the air industry, who failed to put in a bid when the airport was auctioned; nor the government who didn't even mention this "national asset" in the Southeast Airport Enquiry. In regard to Azimuth Associates assertion, that the London airports have no spare capacity to meet a growing need of the air cargo market, they disregard the fact that Heathrow, the largest freight handler in the country, is to massively expand its capacity with a third runway in the near future. Stansted Airport's CAA data (See table A) on cargo tonnage and ATM's show fluctuations in cargo tonnage with no

steady increase over 2016, 2017, 2018. The ATM's show an upward trend over the same period indicative of an increase in passenger traffic. The data demonstrates the fact that Stansted has spare capacity. Moreover, the head of business and cargo aviation at MAG (the operator for Stansted), Conor Busby, Speaking in October 2017, was confident that, "Stansted has potential to meet up to half of London's capacity shortfall over the next few years, and cargo will contribute towards this growth." (2). Stansted has an established trade in importing perishable produce from Africa, a trade that Manston had before and would rely on in the future, and so would be in direct competition with Stansted. RSP's claims and forecasts are highly unrealistic and inflationary. In its submission RSP makes a false assumption in its master plan that freight tonnage/flights will rise inexorably over the next 20 years with not a blip in sight! If you examine the operational data from all the main London airports and, in particular, the dedicated airfreight businesses at Stansted, Luton and East Midlands, the tonnage figures vary on a regular basis and do not follow the Manston pattern suggested by RSP. (See table B). The most damning criticism of Azimuth Associates is reserved for its forecast of future freight tonnage at Manston. After just 2 years it states that there will be 97,000 tonnes, 43% of Stansted's 2016 tonnage and nearly a third of East Midlands tonnage. Then it says that after 10 years of operations it will handle 212,000 tonnes, 95% of Stansted's tonnage and 71% of East Midlands tonnage. Then by year 20 Manston has now one and a half times more tonnage than Stansted (341,000 tonnes to 223,000) and 114% higher than East Midlands (300,000). Where is this massive increase in air cargo coming from? Its main competitors have advantages galore- central locations, established infrastructure, long standing business connections here and abroad, investors to hand and fewer restrictions on night flying (3).

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(1.86 Km south-southwest of Manston's west end runway). We, along with 3,780 (8 years since the last census) Minster residents, will be adversely affected by noise and air pollution caused by the proposed 17,171+ ATM's that RSP claim will be operating after 20 years. Minster's boundary is just 600 metres south-west of the western end of the runway. The whole of Minster is within 2 Km of the runway. Thanet District Council's Draft Local Plan 2031 (6) has 250 (750+ people) houses earmarked for the Northern end of the village, the northern edge of which would be just 250 metres from the flight path. In addition, a further development of 130-140 houses (400+ people), east of Tothill Street, is planned, starting just 600 metres from the flightpath (7).

Further to the effects of night flying, 59% of dedicated cargo ATM's at East Midlands airport are at night. There were 19,357 freighter ATM's. This makes 11,420 night ATM's, or 31 per night.(8) There are no large urban areas near the runway, unlike Manston where the south of Ramsgate, lying under the flight path, has tens of thousands of people (the area starts at 1.2 Km (Nethercourt) to 4.2 Km from runway at Ramsgate sands(7). The type of freight trade envisaged by Manston, long distance from Africa, would inevitably result in regular night flying and with 70% of flights to and from the eastern side of the airport would harm the residents of this area in terms of noise, air pollution, sleep deprivation and mental well-being. (RSP maintains that it can reverse the historical flying record of Manston of 30% western use to 70% eastern use, thereby defying the fact of prevailing winds directions which determine choice of approach!). There are other populated areas that the Minister may not be aware of which are close or adjacent to the Manston site. (see table C). They include: St Nicholas-at-Wade, Minster, Cliffs End, Manston, Monkton. The first mentioned is directly under the western flight path as mentioned earlier. The other four villages are all within 1.5 km of the Manston site or flight path. This amounts to over 8,000 people affected to go with the approximately 20,000 people of south/central Ramsgate; and several thousand who live in Hillborough and Beltinge (suburbs of Herne Bay) which are under or near the western flight path of Manston; although some 11.25 km from the runway these areas are affected by aircraft landing from the west (6). There are other potential populated areas that would be impacted from 24/7 cargo hub airport. In the Draft Thanet Local Plan (2031) the Council have seen fit to choose option 2 in opposition to the government's preferred choice of using brownfield sites. As a result, the 2,500 houses earmarked for the Manston site will now be distributed on greenfield sites around Thanet, almost all of which will be grade 1 agricultural land currently being farmed for crops. Westgate, in the north of Thanet, for example, will have to accept 2,000 houses. There are numerous sites planned for new housing estates that are close to the Manston site. The largest is SHLAA 013(1,200 houses) which starts some 700 metres from the runway and are under or near the flight path). There are 16 other sites, totalling 1,658 houses to the south, south-east, east and north-east of the Manston site. Thanet District Council has submitted a local plan for 2,993 houses equating to nearly 9,000 people (3 per house) who would be subject to serious noise and air pollution. (see table D).

A comprehensive environmental assessment of the impact of a 24/7 air cargo hub at Manston airport has never been done. This is an essential requirement. The air over Thanet and surrounding areas would become more polluted from nitrous oxide, sulphates and soot. Tourism in Thanet, and particularly in Ramsgate, is on the upturn. Ramsgate has attracted visitors with an array of heritage assets. All this would be put at risk, both in terms of enjoyment of the facilities, but also of the very fabric of the historic buildings, by the deleterious effects of noise, vibration, air pollution and visual disturbance.

I should like to comment on the impact of increased traffic flows in and around the airport. There has not been enough importance given by RSP in relation to the impact of increased road transport on the A299, M2, A249, M20, M26, M25 (Dartford crossing area), caused by a large air freight airport. In time there will be big increases in HGV diesel vehicles driving to and from Manston serving its operational, fuelling and maintenance needs. After year 5 Azimuth's Associates' plans forecast over 19,000 diesel driven HGV's. They do not state a figure for diesel driven aviation fuel tankers necessary to supply the aircraft. After 10 years of operation the HGV figure rises to 27,400 movements, and after 15 years to nearly 42,000 movements per year, a frightening 5 per hour throughout the year(5). Over time this heavier traffic would have serious affects relating to increased

travel time, delays, air and noise pollution. Particulates from diesel exhausts are widely recognised as a very serious cause for concern for peoples' health.

Lastly, I should like to give some time to Climate Change that gets barely a mention in the raft of PEIR document on the RSP website. It states "that a full assessment of climate change impacts has yet to be completed, and will be included in the ES." Has the ES been published? Have the Planning Inspector Team seen this ES? May I be so bold as to suggest that the evidence of Manston's operation in respect of greenhouse gas emissions should be a vital element in weighing up its proposed benefits with the damage that a very large carbon footprint would cause. So I say to the Secretary of State for Transport, how would allowing a 24/7 cargo freight hub to be built and operate in terms of greenhouse gas, nitrous oxide, sulphates and soot emissions, from burning aviation fuel used by long distance cargo transport from Africa and increased passenger flights to Europe (in preference to rail travel), sit with now much stricter government targets to reduce carbon emissions urgently, in the face of overwhelming evidence that the warming earth will result in a greater severity and frequency of storms, rainfall levels, droughts and sea level rises that would potentially turn Thanet into an island that it once was- so much for the prospects of the government's buzzword "connectivity," with the Wantsum Channel under seawater!

Alternative Use of the Manston Site

What RSP do not announce loudly is that is that TDC's plan for 2,500 houses at Manston, on a brownfield site, will now go on greenfield sites around the urban boundaries and adjacent to where many of their supporters live! The proposal for Westgate on sea is now for 2,000 houses, double the original allocation. 2,000 houses equates to a minimum of 7,000 people which would more than double the size of the town (2011 census: 6,996)! In addition, this development would be on grade 1 agricultural land. This is in contrast to the government's stated aim, to build on brownfield sites, in preference to food producing land. Stone Hill Park, the former owners, had plans for housing, a manufacturing focused industrial Park, leisure areas including a large country park, sports complex and an Olympic-sized swimming pool, and part of the runway to be transformed into an events and recreational space(9). I believe a plan similar to this for Manston would be more realistically achievable than RSP's plan; it could provide jobs and much needed housing without the threat of serious environmental harm.

Conclusion

The Secretary of State for Transport has an important decision to make. He must look at the facts. The history of Manston airport as a successful aviation business is littered with master plans that were fanciful in their projections, cost the taxpayer big time and served only to prove the one obvious truth that Manston is in the wrong location to work as the air freight hub saviour propounded by RSP. The Minister and his team should carefully examine the credentials of RSP itself: A company with little or no experience in developing and operating a supportable airport. The former owner's mixed development plans for the site were reasonable and measured. As part of that plan it should be made available for housing on its brownfield site, surely a sounder preference. Lastly, and most crucially, the Transport Minister and his team must take into consideration the overriding account of the 35,000 (this will increase substantially over the next decade) people who live, work and play under the flight path or near the airport itself. These are the people who will pay the price for the so called "national asset" operating at the economically viable level.

References:

- 1- Infratil website
 - 2- Sorry but I have mislaid the website reference for this quote
- Table A (source CAA)

Airport	Tonnage/ATM's	2016	2017	2018
Stansted:	Tonnage	224,312	203,746	226,128
	ATM's	164,473	172,201	184,485

Table B (source CAA)

Airport	Tonnage/ATM's	2015	2016	2017	2018
Stansted:	Tonnage	237,045	224,312	203,746	226,128
	ATM's	155,913	164,473	172,201	184,485
East Midlands	Tonnage	266,569	272,203	274,753	334,536
	ATM's	60,754	58,841	61,295	61,298
Luton	Tonnage	23,108	17,992	38,095	26,193
	ATM's	92,005	106,336	107,270	105,723

- 3- Report by Avia Solutions to TDC August 2017
- 4- Night flight disturbance- personal evidence as an attachment
- 5- Table 3.7 Azimuth Associates- Manston Airport air freight forecast
- 6- Distance references from Google Maps
- 7- Thanet Draft Local Plan 2031 ref: SHLAA 072
- 8 CAA data
- 9- SHP website

Table C- (2011 Census data)

Village	Population (2011 census)	*Distance from Runway/Flight path
St. Nicholas-at-Wade	853	4.5 km
Minster	3569	Less than 1.5 km
Cliffsend	1,822	Less than 100 m to l.t. 1.5 km
Manston	1,138	Less than 700m
Monkton	661	1.25 km

*at nearest point

Table D- Thanet Draft Local Plan 2031

SHLAA	Location	No of Dwellings	Potential Residents
013	Manston Court Rd/Haine Rd. Ramsgate	1,200	3,600
016	Cliffsend . S of Canterbury Rd	27	84
018	Haine/Spratling Rds. Ramsgate	85	
020	Opposite Eurokent Business Park/Haine Rd. Ramsgate	250	750
021	Manston Road, Ramsgate	64	132
048	Eurokent-new Haine Rd. Ramsgate	550	1,650
066	Manston Rd Industrial estate. Ramsgate	170	510
?	West of Tothill Str. Minster	250	750
072	East of Tothill Str. Minster	135	405
075	FoxboroughLane, Minster	35	105
076/078	St Nicholas at Wade	61	183
080/081/082	Cliffsend	70	210
087	Manston Rd Allotment Grds. Ramsgate	61	183
0534	Haine Farm, Ramsgate	35	105
Totals		2,993	8,979

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-005280-Raymond%20May%20Final.pdf>

For the Attention of the Manston Airport Case Team

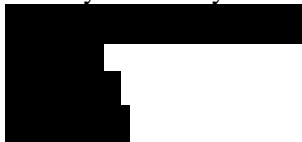
Registration Identification No: 2001 4264

Original submission sent to Planning Inspectorate: 15-5-19

Amended submission sent to SoS for Transport: 31-1-20

Final submission sent to SoS for Transport: 7-7-21

Mr Raymond May



I am representing myself and my wife.

We previously lived in St. Nicholas-at-Wade from 1973 to 2016. The village is 4.4 km from the end of the western runway at Manston. We therefore have first-hand experience of living with noise and pollution from cargo and passenger traffic involving disturbed sleep, and evidence of air pollution from overflying aircraft on washing and outside surfaces. This was created by ATM's of 1,472 in 2011. Azimuth's Associates ATM forecast of 9,900 after 5 years would be 7 times that of 2011, and nearly 12 times after 20 years. Imagine the effects this would have on the people living there now. Please refer to my submission to the Planning Inspectorate dated 15-5-19 (paragraph: Environmental Impacts) for full details. We are now living in at the southern end of. Minster, a village whose northern boundary is very close to the western end of the airport. The Local Plan for Thanet has earmarked 410 new dwellings for Minster which translates to an extra 1,230 residents. The 2011 census cites 3,569, so an increase of one third over the next eight and a half years. Over 60% of this development has already been applied for and will be sited at the northern end of the village, just 870 metres from the runway. "The PEIRs in the RSP document section convey an impression that relatively few people would suffer from noise and air pollution resulting from a fully operational airport. The village [St. Nicholas] is directly under the western flight path at 4.4 Km from the runway. My sleep was always disturbed during any night flights that occurred. The type of aircraft made no difference, as did the decibel count. You cannot make a scientific claim that certain 'low quota' aircraft will not disturb peoples' sleep, nor can you draw lines on a map indicating certain noise levels, and then say people living outside that area will not be affected."¹ Although not directly under the flightpath, Minster is close to the runway and will be impacted by airport traffic in a similar way to St Nicholas.

Issue of Need for the Development of Manston Airport

Clause 8.2.25 The applicant has failed to demonstrate sufficient need for the Proposed Development.²

Clause 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. ²

Clause 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.²

"Manston Airport was the first ever proposed airport development to go through the DCO examination process, the first airport DCO to be challenged, and, apparently, the first grant of consent for a Nationally Significant Infrastructure Project to be quashed by Judicial Review since the introduction of the Planning Act 2008."³ This alone illustrates the lack of impartial due diligence given by the DoT in its examination of the evidence presented by the Planning Inspectorate and others.

¹ Submission to the Planning Inspectorate dated 15-5-19 (paragraph: Environmental Impacts).

² Examiners recommendations to the SoS

³ Crowd Justice-Support Judicial review of Manston airport DCO

This represents an embarrassing climbdown for the DfT. Over two thousand submissions were made on the DCO, a record number of which were from individuals, a majority of whom were against the development. The examiners were tasked with a forensic examination of the evidence from numerous sources, including expert reports from York Aviation and many others. Andrew Stephenson, representing the Secretary of State, chose to ignore compelling arguments that, “fundamentally the whole needs case for the development of Manston as an air freight hub is infected with flaws and errors of understanding such that the so called ‘forecasts’ of air freight and passenger demand have no credibility at all. The scale of the proposed development is unjustified and excessive and the development and operation of the Airport would simply be unviable and incapable of attracting competent investors.”⁴

The main reasons for lack of need are as follows:

- Location- Manston is situated in Thanet at the extreme east of Kent. It is surrounded by sea from the north, east and west. Its competitors; Heathrow, Stansted and EMA are centrally positioned with catchment areas close to motorway networks, manufacturing hubs, distribution hubs and main population centres. Peter Forbes of Alan Stratford & Associates (specialist aviation consultants) states that “the location is too remote... Historic traffic levels at the airport have generally been modest and it has never been to compete with East Midlands and Stansted – the UK’s two largest airports for dedicated freighter traffic.... The increased onward distribution times at Manston are particularly relevant for perishable goods which comprise a significant proportion of all dedicated freighter cargo”.....⁵ Also there is a large population under or close to the eastern flight path of Manston, in central and south Ramsgate. Neither Stansted nor EMA have large conurbations to overfly on approach or take-off.
- Airport Capacity- Azimuth Associates maintain that there is a shortage in airport capacity, and specifically a shortfall in dedicated air freighter supply.⁴ “There has been a switch from freighter aircraft to belly-hold cargo since 2004 which now carries 70% of UK air freight. Cargo activity in the UK has become concentrated at the three cargo hubs: Heathrow, Stansted and EMA.⁵ “All three have plans to significantly expand cargo capacity.” The third runway at Heathrow will expand belly-hold cargo loading capable of supplying any increase in market demand. Stansted and EMA have spare capacity. Much of their freight business, by necessity, occurs at night. At Manston, more stringent night flying restrictions, that would be imposed by Thanet District Council is a key issue identified by Peter Forbes who, “maintains it would strongly impact on relatively modest levels of dedicated freighter traffic that might be achievable.”⁵ CAA data for freight tonnage at the three cargo hubs (*see Table 1*) show substantial increases at EMA but variable figures for Heathrow and Stansted. EMA, a well established, centrally located, modern air freighter cargo gateway, has increased its tonnage by 35,000 tonnes in 3 years.(2016-2019) yet Azimuth’s Associates forecast for freight tonnage at Manston in yr 2 (*see Table 2*) shows 97,000 tonnes and 3 years later, in year 5 shows 174,000 tonnes. An increase of 77,000 tonnes. How could a newly developing, start-up airport on the periphery of east Kent more than double its freight tonnage compared to EMA? This is one very small example of Azimuth Associates’ plucking figures from thin air that do not hold up to the scrutiny of real data. Moreover, “By year 18 Azimuth’s freight business is forecast to exceed the 2016 freight tonnage at EMA, the largest dedicated freight hub in the UK. This is simply not credible or likely.”⁶ Unlike Azimuth Associates, York Aviation asserts that “properly interpreted, Government Aviation Policy makes clear that expansion of capacity at Heathrow, allowing more global air connections providing additional bellyhold capacity and scope, if required, for more dedicated freighter movements at Heathrow, is the identified means of meeting future air freight demand, along with the continued role for East Midlands and Stansted as air freight gateways. Furthermore, York Aviation argues that ⁶ “Azimuth’s conclusion that a shortage of airport capacity is leading to more trucking of freight since 2000 (can be challenged on the basis that) their conclusions are highly simplistic, both Stansted and EMA have expanded freighter activity significantly since 2000 and continue to have spare capacity. “Trucking is a highly integrated component of air freight business and not merely a substitute for air freighter flights when airport capacity is constrained (eg Heathrow), and here the provision of a 3rd runway would reduce this constraint.” ⁷ York Aviation concludes that “this leaves a niche/specialist cargo operative as the only possible market at Manston. This would be consistent with the types of cargo Manston used to handle. Ultimately this is a very small market and unlikely to result in it handling more freighter movements than it did historically. This has profound implications for the Needs Case as a whole.”⁷ (My underlining).

⁴ York Aviation Report Feb 2019 4- Overall conclusion 8.26 5-Ex Summary 2.1 Overview 39

⁵ Alan Stratford & Associates. Manston Airport DCO- Promise of over 23,000 new jobs are flawed

⁶-York Aviation Report Executive Summary

⁷- York Aviation Report-Prospects for Manston/Conclusions 4.46

The clarion call and assertion by RSP that “Manston Airport is a unique and important transport infrastructure asset in the UK”. And its proposal to ‘grandiosely’ “re-open Manston airport as a global freight hub” rings hollow under the searching examinations by York Aviation and Avia Solutions, respected companies specialising in airport planning, capacity and business strategies. Another, by Peter Forbes, in a recent feasibility study concluded that, “ 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.”⁸

Passenger Projections at Manston Airport

Other matters which are material to the matter of re-determination is on the issue of leisure flight business at Manston. Once again the question of location is highly relevant as it would be in competition with Gatwick airport. The highest density of population is in NW and W Kent and SE London suburbs (Medway towns, Maidstone, Tonbridge, Tunbridge Wells, Dartford) have shorter drive times, and better road links to Gatwick airport. Ashford, although closer to Manston airport, has no direct motorway link with it. On examining the historic commercial traffic at Manston airport passenger numbers peaked in 2003 at 204,000.⁹ Thereafter they dropped with large fluctuations from year to year to 2013. (*see Table 4*) Infratil ran the airport then, an experienced commercial company with a wide range of business interests, including airports. Even they could only manage carriers taking 40,000 passengers on holiday in 2013.⁹ (*see Table 4*) Azimuth Associates’ Sally Dixon’s fanciful passenger forecasts from zero in years one and two to 663,000 in year three beggar belief. (*see Table 3*). In 34 years of passenger operations at Manston airport the maximum annual figure was 204,000, well under a third of this start-up figure. To put it in real perspective, Southend Airports’ 2019 passenger total was 130,000 ⁹- with a massively larger population in its catchment area! York Aviation’s Report found that RSP’s case contains no systematic presentation of the passenger market in the UK nor any reasoned analysis of how airlines are likely to respond to the market. Moreover, York Aviation maintains that Azimuth’s passenger forecasts suffer from the same exaggerations as the freight forecasts, “They appear to be based almost entirely on supposition and inferences that cannot be relied upon.” And subject to proper analysis of the market they “confirm that Manston would only attract around half of the passenger numbers projected by Azimuth’s 20 year forecast.”¹⁰ YA concluded that “attracting such services will require public support as well as highly discounted airport charges. Past experience would suggest that there would remain a high risk of airlines failing to sustain routes on a viable basis.”

Clause 8.2.180 The ExA has significant doubts over the calculation of direct, indirect/induced, and catalytic job numbers.¹⁰

Any re-determination of allowing the re-opening of Manston Airport requires a searching examination of RSP’s Business Case, including its employment forecasts.

A key plank in RSP’s rationale is a socio-economic one justifying the development on the basis of massive job creation in an area of relatively high unemployment; indeed, apart from the convenience of European holidays, it is virtually the only argument put forward by supporters of Manston in submissions to the Planning Inspectorate. “Undoubtedly, the Airport could support local jobs if it is re-opened but, in reality, the number of those jobs and their value has not been effectively calculated.”¹¹ Because Azimuth’s freight and passengers forecasts are wildly optimistic it is not surprising that it is mirrored by seriously inflated employment data. ¹² “The operation is simply of a much smaller scale. In Year 2, it generates 452 jobs, only 17% of the Azimuth estimate of 2,654. By Year 20, the differential is even larger, with the Azimuth estimates reaching over 30,000 jobs, but with our estimates at only just over 1,000.”¹² York Aviation concludes that, “Once again, the evidence presented by Azimuth on behalf of RSP cannot be relied upon. It is infected with the flaws in the traffic forecasting methodology identified previously but the approach to identifying socio-economic impacts is, in itself, badly flawed. The socio-economic impacts are, as a result, massively overstated and, in any event, would not be realised if the operation of the Airport is not commercially and financially viable.”¹²

Ramsgate Society commented on the impact on tourism that a 24/7 cargo hub airport, with over 17,000 freight ATM’s per year, would have. ¹³ “The Thanet tourist trade is a growing and vital part of

⁸ Alan Stratford & Associates. *Manston Airport DCO- Promise of over 23,000 new jobs are flawed*

⁹ CAA Airport statistics

¹⁰ Examiners recommendations to the SoS

¹¹ York Aviation Assessment of Capability of Manston Airport: Socio-Economic Impact 5.11

¹² York Aviation Assessment of Capability of Manston Airport: Socio-Economic Impact 5.17 5.18

¹³ Ramsgate Society and Ramsgate Heritage & Design Forum 2.6 Impact on Tourism

the local economy with nearly 4 million visitors” generating £293 million in 2015. Unsurprisingly, This was the year after Manston airport closed.” Many of our beaches, cafés, hotels and visitor attractions would become intolerable and unattractive to visitors due to levels of noise, roads clogged with haulage (and jet fuel) vehicles and significantly worsened air pollution.”¹³ The greatest loss would be in Ramsgate which would “lose tourist visitors and the tourism spend that they bring, and the tourism industry jobs that they support. This inevitable loss to the visitor economy must be offset against any speculative gain in employment that might be generated by the airport in operation.”¹³ RSP has failed to make any comment in its business case on the inevitable negative effect on tourism that a

busy freight hub airport would have. The speculative gain in airport employment would be off-set by a certain loss in tourist related jobs. York Aviation can see no viable justification in including the Northern Grasslands in its DCO for in the unlikely event of a forecast of 17,171 freight aircraft movements a year, even on this basis, the infrastructure necessary to support such traffic could be comfortably accommodated south of the B2050 road. Similarly, it can be inferred that compulsory purchase of land is not needed as the development as stated is containable within existing boundaries.

Lack of A Business Case

I was surprised to discover that the examination of RSP’s application to re-open Manston airport as a major cargo hub did not cover its financial planning. Apparently RSP did not supply even the most basic information that would allow any funder/investor to assess the financial viability of running a re-opened airport. Manston would be categorized as a ‘smaller throughput airport.’ three other airports in the same category as Manston: Glasgow Prestwick, Cardiff and Durham Tees Valley have, in recent years, been taken over by the public sector as experienced private sectors operators could not manage these airports on a viable commercial basis. York Aviation make pertinent points that, ¹³ “Commercial lenders and equity providers will expect a track record of EBITDA generation to support funding of the business. A reopened Manston Airport would be a start-up business with a material capital investment requirement and no history of profitability. Our experience is that commercial debt and equity providers would be unlikely to provide funding to a reopened Manston Airport on a standalone basis without (i) parent company guarantees (from an entity of sufficient financial standing), and (ii) strong evidence of clear contractual volume and revenue commitments from airline users.” And in addition, “Based on the analysis of lower throughput UK regional airports and our experience of the UK airport debt market, we would expect a reopened Manston Airport to struggle to secure material levels of debt in the commercial lending market. As equity funders would also require detailed business plan information to inform their investment decisions, we would expect RSP to struggle to secure material equity investment given the loss-making history of the business over many years.”¹⁴ And a final, very relevant point is that, “A further material issue for the RSP proposal is the much higher threshold of information required to satisfy debt or equity providers for a start-up business with no track record of performance or profitability. This is particularly the case where the project sponsor has no demonstrable track record of developing or operating a commercially successful airport business. This lack of experience and credibility is likely to be a major issue for potential debt and/or equity providers.”¹⁵

Airport Expansion and Climate Change (Effects of COVID19 pandemic on UK Aviation)

The DfT now recognises that it has to respond to the challenge of climate change and decarbonisation. Under recommendations in its Recovery Plan Aug 20 to Aug 2025 it must “ensure the industry delivers on its environment obligations.” Those obligations are mounting by the day. The Climate Change Act (May 2021) means the UK Government has finally agreed that all aviation emissions are subject to legal limits. The COCC in its ‘2021 Progress in Reporting Emissions Report to Parliament’ says that ‘all policy decisions must be compatible with Government climate commitments... Planning policy ... must also reflect these challenges.’ The CCC has strongly welcomed the significant step of the Government announcement that ‘international aviation (and shipping) emissions would be formally included in carbon budgets for the first time when accepting the CCC’s recommendations on the level of the 6th Carbon Budget.’ However, it complains that there is ‘no recognition that aviation demand needs to be managed’. Instead ‘several policies have proposed APD reductions and airport expansion, which are encouraging growth in the sector.’ The report mentions, ‘the overdue Net Zero Aviation Strategy (Government intends to publish this before the COP26 meeting in November) says

¹⁴ York Aviation Executive Summary 2.9 Funding Viability 74

¹⁵ YA Executive Summary 2.9 Funding Viability 74

that the exemption on fuel duty must end as it provides an unfair advantage on the rest of the transport industry paying fuel taxes. It sets out credible pathways and policies to encourage technical development but also to recognise the potential need to manage aviation demand in future' This implies that customer and industry costs should rise to dampen future demand. 'APD has already been mentioned but in the 'Assessment of Airport Capacity' several airports are seeking permission to expand. They are challenging planning permission rejections.' (Stansted is a case in point where Uttelsford Council rejected an increase in the passenger cap which has now been approved by the Planning Inspectorate). COCC says 'The Government has not stated a clear position on the issue (Airport Capacity Strategy). Our advice from the 6th Carbon Budget remains unchanged, there should be no net expansion of UK airport capacity unless the sector is on track to outperform its net emissions trajectory.' The CCC also warns the Government that 'non- CO2 effects of aviation can have significant warming impacts and that they should be included within CORSIA regulations for monitoring and reporting non-CO2 effects.'

Five,10 Twelve Ltd have in their submission to the planning authorities, quite rightly pointed out that: "The Government's carbon emissions forecast for aviation did not and does not include the proposed Manston airport. The UK has a carbon budget for carbon emissions which is based on the UK Aviation Forecasts 2017. The UK Aviation Forecasts 2017 did not include a passenger ATM's forecast for Manston Airport and did not include a cargo aircraft ATM forecast for Manston Airport." Furthermore, Five,10 Twelve Ltd states that: "The Applicant's proposal to use at least 1.9% of the total UK aviation emissions target has not been accounted for and any development at Manston would have a material impact on the ability of Government to meet its carbon reduction targets." Moreover, "it would put at risk the Airports NPS and/or expansion elsewhere."

"The UK has the third highest CO2 emitting aviation sector in the world (after China and the USA) in the world. And in the UK its carbon footprint is huge, especially when you consider it is 21st in population size." ¹⁶ "In the UK aviation is responsible for 7% of CO2 emissions and is expected to overtake all other sources by 2050. Britons are the most frequent flyers to international destinations in the world."¹⁷

This is no longer acceptable. Each one of us needs to be aware of our carbon footprint and the actions we need to take to help reduce it with encouragement from responsible Government and Industry. The aviation sector has been pampered for too long and it can no longer expect to grow unchecked. The world has changed. As David Attenborough so chillingly described in February this year, "Climate change is the biggest threat that the modern humans have ever faced. Some of these threats will assuredly become reality within a few short years. Others could, in the lifetime of today's young people, destroy entire cities and societies."¹⁸ The Airport National Policy Statement 2018 states that "The Government, also acknowledges that the local and national environmental impacts of airports and aviation (eg. Noise and emissions) and believes that capacity expansion should take place in a way that satisfactorily mitigates these impacts within national targets on CO2 emissions and in accordance with legal obligations on air quality."¹⁸ In reference to one of the main mitigation innovations, SAF (sustainable aviation fuel), Doug Parr attempts to dampen the hype. He writes that, "SAF's were not a long term solution for aviation carbon emissions.....at best, a short term climate benefit. At worst, they are a greenwash for damaging agriculture and deforestation. They also give a deluded impression that a solution to aviation's climate footprint is just around the corner. It isn't."¹⁹ In conclusion, there is no doubt that the 6th Carbon Budget whereby the Government is legally committed to reduce the UK's territorial emissions by 78% from their 1990 levels in the period 2033-2037. Aviation and shipping is now included in this scenario for the first time. The COVID 19 pandemic has 'conveniently' reduced aviation CO2 emissions by over 60% from 2019 to 2020, with this reduction level likely to continue this year, with pre-pandemic passenger numbers not returning until 2024 .

CCC puts its finger clearly on the pulse in its key paragraph on uncertainty and is worth quoting in full: "The key areas of uncertainty we test relate to sustainable aviation fuel supplies and costs of synthetic jet fuel, the mix of SAF options, the profile for expansion in passenger demand over time (with mid-term or no net expansion of airports), and whether there will be long-term structural change in the sector due to COVID-19. Out of all the CCC's sectors, Aviation has been most impacted by COVID-19, and continues to face the highest uncertainties about the future size of the sector."²⁰ This statement is key to the SoS's re-determination of whether the 'quantitative need for the Development has been affected by changes since July 2019....'

¹⁶ Air Quality News.com

¹⁷ Guardian 17-1-20

¹⁸ Airports National Policy Statement 2018 -Development covered by Airports NPS 2.17

¹⁹ The Independent 19-4-21 Article by Doug Parr. Chief Scientist for environmental group, Greenpeace

²⁰ CCC- The Approach of the 6th Carbon Budget Analysis on the Aviation Sector

The 'Development,' as envisaged, is highly polluting, the use of older air cargo freighters on long haul flights, the pollution from construction, the pollution from increased traffic in the form of diesel tankers and articulated lorries. The proposed scale of which is at odds with the ambitions of the 6th Carbon Budget. Britain cannot boast of leading the transition to a net carbon world and have one of its government allowing such an atmosphere-damaging project to proceed. The Sector has suffered high losses due to COVID 19 and now has to seriously plan to reduce its substantial carbon footprint. Investors will not be touching Manston with a barge pole under these circumstances, if there are any still interested after perusing RSP's amateurish business plans. The CCC calls for much tougher action on depressing demand. This would have serious implications for RSP in developing its passenger market. The CCC states "demand management policies could take several forms, either reducing passenger demand for flying through carbon pricing, a frequent flyer levy, fuel duty, VAT or reforms to Air Passenger Duty, and/or restricting the availability of flights through management of airport capacity."²⁰ Looking at Sally Dixon's passenger forecasts for Manston Airport over 20 years, all I can say is good luck to the soothsayer!

The role of political bias and favouritism during the application phase and beyond

I agree with NAG's portrayal of the process as being biased and in favour of the applicant, RSP. "A DCO is meant to be a balance of need against the impact on the environment and people's lives."²¹ The Planning Inspectorate had to investigate, listen to and study over two thousand spoken and written submissions, as well as making a physical site inspection-A record for a DCO. After weighing up the evidence it recommended a refusal. A DfT minister, but not the SoS, deemed the application sound and gave it the green light. The airport supporters reasons were centred on just two issues: the airport would alleviate the depressed jobs market in Thanet and local people could enjoy the convenience of European flights. Very few of those supporters cited data from RSP's application related to employment, passenger forecasts, environmental impacts and historical evidence. Less still on the need for an air freight cargo hub at the tip of east Kent. In contrast, opposition voices cited a variety of reasons in detail with others providing comprehensive, well-researched evidence. At community consultations by RSP the emphasis was on the passenger side of the project with aggressive brushing-off tactics when doubts were voiced on environmental impacts, or flaws in their forecasting methodology. The generation of emotion for "Saving Manston Airport" was a dominant impression. Did Andrew Stephenson and his department go through all the paperwork? I fear not. Was he possibly present at one of the 3 lobbying events at Parliament hosted by Roger Gale (MP for Thanet North) in 2018 to promote the re-opening of Manston by RSP? Apart from a presentation by RSP, Roger Gale and a Kent County Councillor, gave speeches. Roger Gale is an avid supporter and has lobbied for RSP behind the scenes for many years. South Thanet's other MP Craig McKinley also keenly supports RSP's application, despite the fact that tens of thousands of his constituents live near or under the eastern flightpath. Both MP's are accused by NAG of not engaging with those constituents that oppose the development. Craig McKinley's interests lie in aviation. He has a business interest in an aviation company, which, apparently, he failed to declare in a parliamentary debate. Not surprisingly, he generally opposes measures in Parliament to limit climate change.²² The SoS, Grant Schapps, will now make a re-determination on the re-opening of Manston Airport. He is a keen flyer, supports private pilots and general aviation and certainly lobbies for growth in the aviation sector. In a statement to the House on the expansion of Heathrow he listed measures to meet its climate change commitments.²³ None of these mentioned were policies to reduce demand. Casting aside his preferences, the secretary should make a determination based on an impartial overview of the issue. As far as I am aware there was no lobbying of MP's from individuals or organisations opposed to the development of a freight cargo hub at Manston. In effect, sections of Parliament were being served with a highly inflated and unrealistic picture of Manston Airport's potential. It was going to rescue the nation's aviation sector from its dire need of a dedicated air freighter cargo hub and transform the economic prospects of Kent.

In summation, the SoS overturned the recommendation by the examining panel to refuse the application by RSP for a DCO to develop Manston airport as an air freight hub. Peter Forbes agrees that, "it simply does not make sense that the SoS can conclude that "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 to the same extent or at all."²⁴ He maintains that the only conceivable reason for the SoS's approval for the DCO application was "perhaps creating a false promise of jobs in a deprived area." He continues, that 'there is little doubt in my mind that that RSP's objective in

²⁰ CCC- *The Approach of the 6th Carbon Budget Analysis on the Aviation Sector*

²¹ *Nethercourt Action Group. (an estate that lies close to Manston airport and is under its eastern flightpath)*

²² *Wikipedia : Parliamentary Voting Record*

²³ *Statement to Parliament 29-2-20*

promoting the Manston development is to sell all or part of the land for housing and/or industrial development.’

The approval decision by Andrew Stephenson of the DfT was in turn challenged by Ms Dawes, who brought a Judicial Review. The High Court quashed the DCO on three grounds: Need; Breach of Procedural Requirement/Unfairness; Net Zero Duty. In the re-determination of the case the SoS has to provide irrefutable evidence of the need of such a development. He has to properly research all the evidence provided by the Planning Inspectorate, this being done on the basis of impartiality and free of bias. He has to prove beyond doubt that the development does not breach or threaten the legal targets set down by the Government in its promises to limit greenhouse gas emissions, furthermore, he has to consider whether such a development is in keeping with, and in the spirit of the legal requirement, to reach net zero emissions target by 2050. Bearing in mind that the duty to reach this target would be seriously undermined by the expansion of aviation traffic in the coming years, including Manston airport, which by year 20 of its operations would see it have 17,171 air freighter movements and nearly 1,500,000 passengers per year. ²⁵ And these projections would be even higher by 2050. The SoS has to seriously consider the standing of the UK in asserting its world leadership claims to cutting CO2 emissions when hosting the forthcoming COP 26 meeting. Permitting this development, among others, would tarnish the UK’s reputation. The world would, quite rightly, question its actions against its fine sounding pronouncements to reach net zero by mid-century.

25 Azimuth Associates: Manston Airport, a National and Regional Asset.Vol.3: The Forecast

Table 1- Source: CAA

Airport	2016 Freight Tonnes	2017 Freight Tonnes	2018 Freight Tonnes	2019 Freight Tonnes
Heathrow	1,541,029	1,698,461	1,685,137	1,587,486
EMA	300,029	324,216	334,536	335,948
Stansted	223,202	236,891	226,128	224,139

Table 2 Source: Azimuth Forecast of freight Tonnage at Manston Airport

Yr1	Yr2	Yr3	Yr4	Yr5	Yr6	Yr7	Yr8	Yr9	Yr10
-	97,000	109,000	167,000	174,000	181,000	193,000	201,000	203,000	212,000
Yr11	Yr12	Yr13	Yr14	Yr15	Yr16	Yr17	Yr18	Yr19	Yr20
222,000	235,000	245,000	257,000	271,000	284,000	297,000	312,000	325,000	341,000

Table 3- Source: Azimuths Associates Passenger Forecasts for Manston Airport

Year	Passenger Numbers
1	0
2	0
3	662,768
4	679,868
5	686,672
6	965,925
7	975,591
8	975,591
9	975,591
10	975,591
11	1,011,587
12	1,049,022
13	1,087,954
14	1,128,444
15	1,170,553
16	1,214,347
17	1,259,892
18	1,307,259
19	1,356,521
20	1,407,753

Table 4- Source: CAA Historic Airport Data
 Historical Manston Passenger Figures from 1990 to 2014

Year	Passenger Numbers	Year	Passenger Numbers
1990	18,608	2002	52
1991	4,414	2003	3,256
1992	6,459	2004	100,592
1993	7,810	2005	206,825
1994	3,382	2006	9,845
1995	2,523	2007	15,556
1996	941	2008	11,625
1997	2,936	2009	5,335
1998	2,269	2010	25,692
1999	1,511	2011	37,169
2000	7,594	2012	8,262
2001	5,761	2013	40,143
		2014	12,385