

REDETERMINATION OF THE APPLICATION BY RIVER OAK STRATEGIC PARTNERS LTD. FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE REOPENING AND DEVELOPMENT OF MANSTON AIRPORT IN KENT

Submission by the South East Region of the Chartered Institute of Logistics and Transport (CILT)

Introduction

- 1 The Chartered Institute of Logistics and Transport (CILT) is a professional institution with in the region of 18k members embracing all transport modes whose members are engaged in the provision of transport services for both passengers and freight, the management of logistics and the supply chain, transport planning, government and administration.
- 2 This submission is made on behalf of the Kent Group of members which rests within the South East Region of the Institute.
- 3 The South East Region of the Institute has been supportive of the River Oaks process throughout the consultation process having responded to the Community Consultation process in July 2017. Our submission in relation to the redetermination is based on our original views albeit updated to take into account the four specific areas for which views were sought and in particular changes in circumstances over the last 2 years, especially Brexit and the implications of Covid 19.

2. Reasons for supporting the river Oaks Application relating to Recent National Trends

- 1 Covid 19 has had major implications for air freight. Passenger air traffic levels have plummeted since spring 2021 whereas reductions in freight tonnages have been relatively small and are moving towards pre-Covid levels. However freight flights have increased due to the reduced availability of passenger operations where belly hold freight capacity is available.
- 2 The River Oak Plans envisaged a reliance mainly on long haul intercontinental flights rather than short haul to and from Europe. It is becoming clearly apparent from changes to post-Brexit trading arrangements that long haul freight is going to experience considerable increases and on longer journeys where maritime transit times can be very long, the benefits of air freight will be most keenly felt.
- 3 Recovery in passenger demand post- Covid will result in the return of passenger aircraft able to carry cargo and so the trend to all-cargo aircraft will reduce to a degree. But, the recovery in passenger demand is likely to take 3-5 years, with long haul, on which most cargo is carried, being the slowest to recover. In addition an early casualty of Covid 19 was the withdrawal of Boeing 747 passenger fleets which had significant cargo capacity and the use of smaller passenger aircraft on long haul routes such as the A321XLR which have significantly less cargo capacity. This will lead to an upward trend in freight-only flights, particularly over the short to medium term until new generation twin-engine wide bodied aircraft with 20+ ton belly hold capacity become more commonplace.
- 4 Trends in worldwide trade are also significant, with current shortages of maritime capacity and increasing border controls at sea ports which can be expected to lead towards increased air freight demand, particularly in the shorter term.
- 5 Assumptions about capacity at UK airports for cargo have also changed since 2019 due to Covid 19. For example the effects of Covid 19 on air traffic could delay considerably any progress on a third runway at Heathrow which will limit potential freight capacity at the airport in addition to the loss of belly hold capacity referred to above. Stansted's planned expansion is based on mainly low cost passenger operations which have limited potential

for belly hold freight capacity and there is unlikely to be any spare runway capacity for increased dedicated freight operations. East Midlands is the UK's major air freight hub but its geographical location in the UK and severely congested motorway network around and north of London constrain its attractiveness to businesses in the South East and therefore additional air freight capacity south east of London will widen options available to air freight customers.

3. Reasons for Supporting the River Oaks Application relating to local Factors

- 1 There is the hope that extra air freight capacity in the extreme South East will allow some freight traffic to travel directly to and from the UK without transshipment to lorry in mainland Europe, thereby reducing lorry traffic on a particularly congested route.
- 2 Kent, due to its location close to Europe and at the south east tip of the UK, is more directly affected by Brexit than the rest of the UK. The presence of a functioning Air Freight centre with surrounding employment centres will be beneficial in attracting new international trade to the UK and the South East in particular. A particular business sector that Manston could attract is the high-tech sector including bio tech companies such as Pfizer who could be attracted to the business premises close to a working airport available for international business jets, particularly in view of future improved rail access to the new Thanet parkway station on the High Speed line to London St Pancras as well as the availability of an increasing stock of new and established housing in a more affordable part of the south east.
- 3 The economy in the eastern corner of Kent has not kept pace with other parts of South East England and a major employment and trade centre can only be beneficial to this part of the county.
- 4 Although freight traffic is the prime area of the business case for the airport, the additional passenger traffic that is planned will provide a valuable facility for residents from mid- and East Kent that will reduce the need for travel to airports in the London area on particularly congested road and rail networks. This potential traffic is likely to increase over forthcoming years in line with major increases in housing throughout most of Kent.
- 5 Air space within the London area and much of surrounding south east England is extremely congested. Manston, being at the extreme eastern tip of Kent and surrounded by the sea to the north, east and south is one of the least congested airspaces in the South East and the closeness to sea on three sides also minimises the number of residents adversely affected by aircraft taking off and landing. In addition its former RAF status means that it has an extremely long runway which is particularly useful for air freight operations.

4. Other issues for Consideration Including Potential Concerns

1. Assuming that the anticipated trade materialises this would put additional pressure on an already congested road network to, from and across Kent. It is essential that any proposals are accompanied by improvements to the trunk road network in Kent and in particular the additional Lower Thames river crossing, increased capacity on the A2/M2 and M25 and improvements to the M2/A299/A2 to remove bottlenecks, particularly at key junctions including Brenley Corner. The development also needs to be accompanied by improvements to road access between the A299 and the access points within the complex, especially the Manston Road/Spitfire Way crossroads. Good links to nearby rail facilities would also be desirable as well as good bus links between the site and neighbouring towns and residential areas for the benefit of workers and airport customers, ideally also linking with Ramsgate and Ramsgate Parkway stations. If River oaks plans for linking with London via Ramsgate

Harbour and the Thames are to become viable, good road links from the airport site and Ramsgate Harbour will be vital, particularly the routes linking the airport site with the currently underutilised harbour link road.

2. In addition we consider that the wider value of Manston Airport to the UK as a whole has to be taken into account. As well as the local economic value of an operational airport we are also of the view that there must be a tangible benefit to UK national security of an airport with a runway of this length remaining available close to the south east coast of the UK. Although the UK has enjoyed a period of peace since World War 2 the world currently faces considerable uncertainty and allowing the loss of the last remaining RAF-standard airfield to housing or other use in the area of the UK closest to mainland Europe appears to be a highly questionable strategic course of action. Allowing a proposal of this nature to proceed is therefore a sensible and desirable decision on national security grounds.