

Response by Interested Party

Laura Marks



Dear Department of Transport

Re Your letter dated 19 June 2021; Redetermination of Manston Cargo DCO

A MATTER OF (NO) NEED

As requested, I write to share thoughts on the following items from your letter of the above date.

1. *You have requested a comment on the extent to which current national or local policies (including any changes since 9 July 2020 such as, but not limited to, the re-instatement 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.*

The case for need has never been proven, nor were the alleged benefits outlined by the overruling of the planning inspection ever made clear, nor relevant to Thanet. At best, the benefits were woolly and vague and directed at communities over 50 miles away and the outcome contained not a shred of evidence of the case for need. I remain unable to understand why this saga is yet again trying to pursue the case of need or explore evidence for need as there simply is none. RSP were unable to prove need, and most responses to the inspection, those who do not support this cargo hub, also demonstrated huge evidence sources for lack of need. There is no need for Manston.

2. *You have asked whether the quantitative need for the Development has been affected by any changes since 9 July 2019, and if so, a description of any such changes and the impacts on the level of need from those changes (such as, but not limited to, changes in demand for air freight, changes of capacity at other airports, locational requirements for air freight and the effects of Brexit and/or Covid)*

Forgive me for stating the obvious, but as above, there has never been a quantitative need for a cargo hub at Manston. What we have in fact, is a DCO application riddled with grossly exaggerated figures, without a single shred of evidence to support viability. I quote from the Sandwich public hearings as follows in respect of viability. At these public hearings I was astonished that the ONLY report ever written in support of the Manston DCO did not contain any content in respect of viability. How did this DCO even get this far?

From the public record:

James Shawn (Barrister) "I'll try it a different way. You have produced a forecast for the applicant to demonstrate both a need and the viability of that need. Haven't you?"

Dr Sally Dixon Author of the Azimuth Report "No I have produced a forecast and the viability was done separately"

JS "It is essential, isn't it, for a forecast to be forecast to understand whether it is going to occur and consequently whether it's viable? Correct?"

DSD "That is correct"

JS "Are you saying Dr. Dixon that the Azimuth Report doesn't do that exercise?"

DSD "As I've said the report provides the forecast the viability was assessed separately, I wasn't asked to come up with a forecast which showed viability or not. I was asked to produce a forecast, whether it was viable or not was not in my hands"

JS "Dr Dixon I'm struggling to understand your answers. A forecast is a prediction of what will happen at Manston Airport and therefore for you to be telling the Examining Authority that this will happen or likely to happen you must think it viable mustn't you?"

DSD "I disagree. I was asked to produce a forecast in terms of ATMs and tonnage. Whether that was viable is not part of the Azimuth Report."

JS "So if the Examining Authority wanted to know if your report is likely to come about, they will hunt in vain for that in the Azimuth Report? Is that correct?"

DSD "That is correct"

3. *the extent to which the Secretary of State should, in his re-determination of the application, have regard to the sixth carbon budget (covering the years between 2033 – 2037) which will include emissions from international aviation; and*

I say please do have regard for the carbon budget, but I would query which UK airport are you planning to downsize because of a preference to support the unproven Manston project? We are already suffering the spin of RSP talking up carbon budgets as aspirations, not policy.

4. *any other matters arising since 9 July 2019 which Interested Parties consider are material for the Secretary of State to consider in his re-determination of the application*

Firstly, I have no doubt that the Secretary of State has seen the enormous amount of good quality evidence submitted by those like me about Manston during the public examination. I would like to think the SoS has read this content or at least recognised the depth of feeling, and more importantly, the overwhelming evidence base against this plan. Secondly. I would also like it known for the record that I stand by ALL my previous submissions to the last inspection.

Therefore, if you are going to read anything material, can I suggest the following short appendices and comments may assist you.

APPENDICES & COMMENTS

1. Noise and the impact on Ramsgate. A town where people had their chimney pot knocked off by landing gear the last time the Manston project was alive (albeit shortly). How can it be that anyone in office would ever take this application seriously? A cargo plane approaching Ramsgate Harbour at 700 feet every 12 minutes and at 200 feet by the time it has flown

directly over a town of 40,000 including many schools where noise in excess of 100Db was routinely monitored during the last operating period.

2. The housing market and tourism market would be decimated.
3. The overseas investors remain shrouded in mystery and apparently to be replaced by 'new investors'.
4. Political meddling. I would also like to comment how problematic it is for Sir Roger Gale MP (self-confessed MP for RiverOak) to be permitted to ignore the views of the majority of Ramsgate by rolling out the same 'you voted Tory, this means you voted airport' because let us be frank, it is a safe seat and plenty of Conservatives are vehemently opposed to Manston.

Somehow, the MP for Thanet North, and Thanet District Council have politised this saga. None of us are naïve enough to ignore that TDC elected cabinet shakes itself around in support of whatever the latest pet project is. In the six years I have lived here we have had four administrations and have already suffered the Seaborne Ferries disaster and you really think folk believe the jobs spin of Tony Freudman given Manston employed less than 150 people the last time it went bust? It would be a little like believing the latest (supposedly informal) briefing to TDC behind closed doors where hydrogen fuelled planes and electric barges are part of the latest thinking.

4.

From the inspector's report

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.

C Article by Alan Stratford and Associates

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

EXCERPT "Location is too remote in terms of freight; the key disadvantage of Manston is its location at the extreme SE corner of the UK and its poor surface access. 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, which account for some 71.7% of all cargo handled by dedicated freighter aircraft. The increased onward distribution times at Manston are particularly relevant for perishable goods which comprise a significant proportion of all dedicated freighter cargo. In addition, the inability to offer night flights at the airport, which is a condition of

the DCO, will be a significant constraint for the development of a freight hub, particularly for main international freight package couriers such as FedEx, UPS and DHL”.

NOTE: 23,000 was the revised jobs figures (even then seen as grossly exaggerated) from the original 30,000 jobs peddled around Thanet at various public consultations. This casual approach to hyper inflated jobs exaggeration is what encourages people to believe in the Manston dream and these figures do nothing but generate hostility to anyone who continues to oppose the Manston project.

The rest of the application is at least as poor as the case for need; funding, viability, demand, safety, sound, pollution, the natural environment. WHY is this government not striving to generate green jobs in green industries on the brownfield dormant military airfield that is Manston?

I am also bemused how RSP received compensation post Brexit for delays to an airport they 1. Do not have planning permission for 2. Have no CAA license for; 3. Have no evidence the MOD has moved the High-Resolution Detection Finder (HRDF) or 4. Has no customers. What exactly were they being compensated for?

This plan is monstrous, inept, the case for need is not proven, along with the case on all other criteria. I urge you to base your latest decision on the lack of evidence for need, because there is no need.

With best wishes

Laura Marks