



MANSTON AIRPORT: FURTHER REPRESENTATIONS, JULY 2021

Ramsgate Town Team is the umbrella body representing and supporting a broad section of traders and voluntary bodies in Ramsgate, East Kent. Our mission is to make Ramsgate a great place to live, work and visit. We are a registered Interested Party for this Inquiry.

The SoS has requested information under the headings below: this is our response.

- 1) 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**

1.1 National Policies: Government Net Zero Commitment

The 2008 Climate Change Act committed the UK to an 80% reduction in carbon emissions on 1990 levels, to be achieved by 2050. June 2019's secondary legislation extended that target to 'at least 100%'.

The UK is currently not even on track to meet its previous target of 80% emissions reductions by 2050. The Climate Change Commission describes the net zero target as 'technically feasible but highly challenging'.

Progress is slow: in July 2019 the CCC described the Government's policy actions as 'falling well short' of those required for net zero. The Institute for Government concludes: "The Government has announced some policy changes in response, such as bringing forward the ban on the sale of new petrol and diesel cars from 2040, but more is needed."¹

In these circumstances, approving an entirely new air freight hub against the considered advice of the Planning Inspectorate would appear foolish, especially as no need for this Development has been demonstrated (see below).

1.2 National Policies: ANPS Reinstatement

In 2015 the Airports Commission recommended a new northwest runway at Heathrow – controversial in light of the net zero commitment. The Court of Appeal ruled this illegal in June 2020 but that decision was overturned by the Supreme Court in December 2020.

If expansion at Heathrow goes ahead, Government estimates are that this will provide capacity for 43,000 long haul flights per year and considerable extra capacity for cargo. If this happens, it will substantially reduce any potential demand for the Development at Manston – and if it does not, that is likely to be as a result of overall reduced demand for aviation, which likewise negates any need.

¹ <https://www.instituteforgovernment.org.uk/explainers/net-zero-target>

PINS concluded in October 2019: *“The ANPS remains an important and relevant consideration in the determination of (this) application, particularly where it relates to London or the South East of England... Government policy states that the Government is minded to be supportive of all airports which wish to make best use of their existing runways, including those in the South East (ANPS paragraph 1.39)....It appears to the ExA that Heathrow would be able to accommodate the projected 3m tonnes of air freight per annum in due course and that more markets would likely be served by routes from the Northwest Runway at Heathrow, should demand exist.”*²

1.3 Local Policies: Thanet Local Plan

Thanet’s Local Plan was adopted in July 2020. In respect of Manston it states:

“1.38 The Council recognises that proposals are being put forward by River Oak Strategic Partners for an airport operation at the site, through a proposed development consent order (DCO), pursuant to the Planning Act 2008... 1.39 If a DCO for Airport use is granted, the early review of the Plan will need to take this into account as well as its implications for other policies in the Plan and consequential land use considerations. In the event that the DCO is not granted or does not proceed, the Council will similarly need to consider the most appropriate use for the site as part of the early review.”

The resulting policy (SP07) specifies that ***“the future use and development of Manston Airport and/or other policies affected by the outcome of the DCO process will be determined through the early review of the Plan.”***³

The Council’s caution in designating the site for aviation only if the DCO is granted and the Proposed Development proceeds, and otherwise making the future use of the land subject to early review, is understandable in the light of a series of reports, some of them commissioned by the Council itself, all drawing similar conclusions about the extremely limited potential of Manston as a commercial airport. TDC’s most recent commissioned report, by Altitude Aviation in January 2018, concluded quite simply: “Manston has historically played a role as a niche air freight airport. We do not see potential for a more significant role in the future.”

The Local Plan also states: *“All major development schemes should promote a shift to the use of sustainable low emission transport to minimise the impact of vehicle emissions on air quality, development will be located where it is accessible to support the use of public transport, walking and cycling.”* It is difficult to see how a new airport fits with this policy.

1.4 Local Policies: Thanet District Council Climate Emergency Declaration

In July 2019 TDC declared a Climate Emergency, committing itself to:

² infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002FinalRecommendationReporttoDfT.pdf pp98-99

³ <https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-Local-Plan-July-2020-1-1.pdf> p30

- *“Do what is within our powers and resources to make Thanet District Council carbon neutral by 2030, taking into account both production and consumption emissions;*
- *Call on Westminster to provide the powers and resources to make the 2030 target possible;*
- *Continue to work with partners across the County and region to deliver this new goal through all relevant strategies...”⁴*

The Council’s website highlights the need for urgent action as follows:

“The impacts of climate change are devastating. As the world heats up as a result of human activity we’re seeing more extreme weather; increased rainfall and greater risk of flooding as well as hotter, drier summers and scarcity of water... We are running out of time before these changes become irreversible. We can still do something about it but we all have to start to act now. That’s what makes it an emergency.”⁵

Establishing a new airport in Thanet would run directly counter to Thanet District Council’s climate policy, as it would to the Government’s.

1.5 Local Policies: Kent County Council Climate Emergency Declaration

In May 2019, Kent County Council issued a Climate Emergency declaration, stating:

“We recognise the UK environment and climate emergency and will continue to commit resources and align its policies to address this. Through the framework of the Energy and Low Emissions Strategy, we will facilitate the setting and agreement of a target of net zero emissions by 2050 for Kent and Medway.”⁶

The Council’s targets are:

- *“We will reduce greenhouse gas emissions from our own estate and activities to net zero by 2030.*
- *We are also committed to reducing greenhouse gas emissions from the whole county to net zero by 2050”⁷.*

It is difficult to see how KCC can achieve this latter commitment if a new air cargo hub is established in East Kent.

- 2) Whether the quantitative need for the Development has been affected by any changes since 9 July 2018 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)**

⁴ <https://www.thanet.gov.uk/info-pages/climate-emergency/>

⁵ Ibid

⁶ <https://www.kent.gov.uk/environment-waste-and-planning/climate-change/climate-emergency-statement>

⁷ Ibid

After its extensive public examination, PINS concluded: *“the Applicant has failed to demonstrate sufficient need for the Proposed Development”*. Our evidence suggests that since PINS’ report in 2019, any need for this facility has reduced rather than increased.

2.1 Reducing demand for air freight:

CAA statistics show substantial reductions in the UK air cargo market since Covid, with a reduction of over 20% between 2018 and 2020. Dedicated freighter traffic increased temporarily as passenger flights, and consequently bellyhold capacity, slumped during the pandemic, but as passenger flights have restarted freighter ATMs have reduced again.⁸

IATA has recently described the past year as ‘the worst year for air cargo demand since performance monitoring began’.⁹ Forecasts and predictions vary, but the combined effects of Brexit and Covid make it unlikely that there will be a significant increase in demand for dedicated air freight in the foreseeable future. The Office of Budget Responsibility predicts a 4% reduction in GDP, for example, with a resulting impact on imports and exports.

This suggests now is not the time to establish a new dedicated cargo airport in East Kent.

2.2 Other UK airports:

We have highlighted above the likely increase in capacity at Heathrow as a result of the December 2020 Supreme Court judgement.

The UK’s second largest cargo airport is East Midlands, where 13% of total UK air freight was handled in 2019. EMA has substantial spare cargo capacity, is located centrally in the country and is surrounded by logistics and warehousing facilities, making it a strong candidate for future cargo expansion.

In the South East, Stansted is a well-established cargo airport with strong predicted growth in cargo ATMs since 2016. The much smaller but more local Lydd airport is also expanding.

Even before the Heathrow decision, PINS concluded in October 2019: *“the levels of freight that the Proposed Development could be expected to handle are modest and could be catered for at existing airports (Heathrow, Stansted, EMA, and others if the demand existed). The ExA concludes that Manston appears to offer no obvious advantages to outweigh the strong competition that such airports offer....”*¹⁰

Moreover, as we have pointed out in previous submissions, RSP Ltd’s business case depends substantially on taking business from other airports and not on an increase in demand, which makes it difficult to establish a real need for the Proposed Development. It is hard to believe that these well-established businesses would permit a new airport to move in on their existing cargo business – particularly after a period during which all airports have experienced a reduction in custom and revenue, and thus are primed for competitiveness.

⁸ <https://www.ramsgatetown.org/upload/docs/7%20Jul%20-%20Council%20-%20Consultancy%20Advice%20-%20redetermination%20of%20the%20Application%20for%20a%20DCO%20of%20Manston%20Airport.pdf>

⁹ <https://www.ti-insight.com/briefs/the-future-of-air-freight-in-the-aftermath-of-covid-19/>

¹⁰

2.3 Job Predictions:

We note that RSP Ltd's job predictions have reduced considerably, from many thousands in their original business plan - figures received sceptically by PINS, who asked for further evidence - to 2,150 on site by Year 5 of operations.¹¹ This reduction is apparently the result of a belated realisation by RSP Ltd that cargo handling is largely automated – a fact that we and many others have pointed out in previous submissions. As in its entire history of operation as a commercial entity the airport has never employed more than a few hundred staff, even these figures appear extremely optimistic.

In its concluding report, the only potential benefit of the Proposed Development that PINS upheld was the creation of employment. Set against this, however, is the potential loss of tourism jobs. Tourism has expanded substantially in Thanet in recent years, and with post-Covid 'staycations' we hope for further increases. Thanet District Council's recent Levelling Up Fund bid for Ramsgate concentrated on the employment and training opportunities offered by our hospitality, tourism and marine sectors.

Cargo planes passing over Ramsgate at a height of a few hundred feet every 15 minutes throughout the day would, however, change this. RSP's own documentation states that their Proposed Development would have 'significant adverse effects' on Ramsgate. PINS concurred: *"the amenity impacts from the construction and operation of the Proposed Development would adversely affect the tourism industry in Ramsgate."* The negative effect on tourism demand and resulting decrease in available jobs and training opportunities in tourism and hospitality must therefore be set against any planned job numbers at Manston.

2.4 Unchanged factors:

- **Location:**

Manston is located in the extreme South East of the country, well below London. 75% of the area around it is sea. Space for warehousing and logistics companies is thus very limited, and routes out of the area effectively only in one direction.

As we have highlighted in previous submissions, transport routes from the area are poor. By road, they consist of a single dual carriageway leading to the M25, the most congested motorway in England. Rail access via Thanet Parkway Station is planned, but still depends on poor quality, time-consuming road access between the station and the airport. At a recent presentation, RSP Ltd suggested electric barges on the Thames would be used to transport cargo from Ramsgate Port; however, under questioning they accepted that they knew of only one such barge in current use, as a pilot project at the Port of London – and once again the area's limited roads would be needed to move cargo from the site to Ramsgate Port.

It seems likely that air freight companies would prefer the seamless offer available via Stansted or EMA to these unco-ordinated and bitty arrangements. In their final report, PINS record York Aviation's observations on location: *"York Aviation [REP3-025] considers that*

¹¹Personal communication, Thanet District Council Members' Briefing, 6th July 2021

Manston is in a poor position to serve the wider South East market or the UK. They also note the lack of critical mass of manufacturing nearby, the lack of a passenger hub and proposed night flight restrictions, considering that within a three-hour drive from Manston only the South East and the east of England can be reached, whereas most of England and Wales is within three hours of EMA. ¹²

- **Business Plan:**

PINS concluded after its examination that: *“the Applicant’s forecasts, when seen in the light of the historical performance of the airport seem ambitious. Previously the airport did not go above around 50,000 tonnes of cargo and 200,000 passengers a year, compared to the 340,000 tonnes and 1.4mppa forecast now.”*¹³

The transcript from the PINS hearing on 21st March 2019 in which Dr Sally Dixon was interviewed on her Azimuth Report that this report had not considered the viability of the Proposed Development but only the technical aspects:

Dr Dixon: “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”

Barrister for SHP: “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?”

Dr Dixon: “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.”

Barrister: “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?”

Dr Dixon: “That is correct.”

As the Azimuth Report is the one that the Applicant has relied on in support of the Proposed Development, and other published reports by experts (York Aviation, Avia, Falcon, Altitude to name but four) do not see the Development as viable, this is a worrying admission.

We know of no progress by RSP Ltd since then in developing a business case that will reassure us as to the viability of the Proposed Development. In a location where commercial aviation businesses have failed three times already, this should be a concern for the SoS.

3) The extent to which the SoS 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

¹² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> p 92

¹³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> p 98

The Climate Change Act 2008 established carbon budgets to give guidance to Ministers on greenhouse gas emissions permissible during specific periods, with the sixth carbon budget relating to the period 2033-37. The CCC makes it clear that considerable changes to policy and practice will be needed to meet our net zero target, with their *“recommended pathway... in effect bringing forward the UK’s previous 80% target by nearly 15 years”*.¹⁴

To meet the requirements of the sixth carbon budget, we need to reduce UK air traffic, both for passenger and freight transport, very considerably. As Alan Stratford Associates’ 2021 report for Ramsgate Town Council points out, *“Manston’s potential 1.9% share of the UK’s aviation carbon target by 2040 is implicitly already allocated to other airports, many of which have existing planning consent for such growth. In these circumstances, DCO consent for the new Manston development must be regarded as unjustified.”*¹⁵

In a recent briefing for Thanet District Council members, Tony Freudmann of RSP Ltd stated that Manston would be the greenest airport in history – though it does appear that his reference was primarily to the terminal buildings and not to aviation operations or the necessity to truck cargoes for large distances from Manston. As well as the proposal to transport cargo in electric barges, referred to earlier, Mr Freudmann suggested the airport would be using hydrogen-fuelled planes, thereby massively reducing its carbon impact. A recent report by Airbus to the EU, however, suggests that such technology will not be available until 2050¹⁶, whereas RSP Ltd propose embarking on construction early next year, with a view to completion in 2024, and thus implications for forthcoming carbon budgets.

RSP also claim their entire operation will be carbon-neutral within 5 years of starting up.¹⁷ While this would be welcome, like many of their forecasts, it appears excessively optimistic.

Conclusion:

Since PINs reported in October 2019 post-Covid and post-Brexit changes appear to us to make RSP’s plans both less likely to come to fruition and less desirable if they do. Meanwhile, the existing negative impacts of the Proposed Development - on tourism, on our climate and our environment - appear unchanged, and RSP’s Business Plan appears as unrealistic as ever. In conclusion, therefore, we strongly support the Planning Inspectorate’s conclusions that consent for a DCO should not be granted.

¹⁴ <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

¹⁵ <https://www.ramsgatetown.org/upload/docs/7%20Jul%20-%20Council%20-%20Consultancy%20Advice%20-%20redetermination%20of%20the%20Application%20for%20a%20DCO%20of%20Manston%20Airport.pdf>

¹⁶ <https://www.reuters.com/business/aerospace-defense/airbus-tells-eu-hydrogen-wont-be-widely-used-planes-before-2050-2021-06-10/>

¹⁷ Personal communication, Thanet District Council Members’ Briefing, 6th July 2021