

Manston Airport Case Team  
Department of Transport  
Great Minster House  
33 Horseferry Road  
London SW1P 4DR

9 July 2021

Dear madam/sir

### **Manston Airport development consent order**

Thank you for the opportunity to comment on this matter once again.

As I'm sure the Secretary of State is aware, the context surrounding plans to reopen Manston Airport have changed very significantly since he granted RiverOak Strategic Partners (RSP) a DCO last year, against the advice of his planning advisors. These changes essentially fall into two categories:

- the post-Covid aviation industry, and
- climate change

On both counts, the changes have significantly undermined RSP's already weak case for Manston Airport. So much so, in fact, that we can reliably predict that, based on RSP's business model, industry trends and the existential threat of climate change, Manston will either be a commercial or an environmental disaster. Or, in the worst case, both.

Covid has significantly undermined RSP's case for a freight hub at Manston. Before the pandemic, around 40% of the world's air cargo was 'bellyhold' freight, carried via passenger aircraft. For both major airports and carriers, 'bellyhold' has proved an economic life-saver because of Covid's impact on passenger numbers.

The fall in passenger trade during the pandemic is commonly estimated at between 40% and 70%<sup>1</sup>. According to the International Air Transport Association, global passenger demand and capacity fell 70.3% and 58.6% respectively between 2019 and 2021<sup>2</sup>. However, according to Accenture, global air cargo capacity between 1 and 14 June was only 11% down over roughly the same period<sup>3</sup>, with freight volumes down by under 28%<sup>4</sup>. Global demand in April was up

---

<sup>1</sup> [https://www.icao.int/sustainability/Documents/COVID-19/ICAO\\_Coronavirus\\_Econ\\_Impact.pdf](https://www.icao.int/sustainability/Documents/COVID-19/ICAO_Coronavirus_Econ_Impact.pdf)

<sup>2</sup> <https://www.willistowerswatson.com/en-GB/Insights/2021/01/covid-19-impact-on-the-air-cargo-industry>

<sup>3</sup> <https://www.accenture.com/gb-en/insights/travel/coronavirus-air-cargo-capacity>

<sup>4</sup> <https://www.aircargonews.net/freighters-world/how-coronavirus-has-turned-the-airfreight-market-on-its-head/>

53% on a year ago, while widebody capacity was up by 51%<sup>5</sup>. In other words, the air freight industry has come to rely more heavily on bellyhold flights via major airports, which offer the greatest economies of scale and are less restrictive in the range of destinations. Supreme Freight, which operates out of Heathrow, puts it this way: “Although freighter aircraft continue to operate by cargo operators and freight forwarders, many of these aircraft are hub focused and are not able to access the same extensive route network as commercial aircraft, which is proving restrictive.”<sup>6</sup>

The point here is that the enormous losses sustained by the aviation industry has and will continue to reinforce the move from peripheral ‘hubs’ to bellyhold. Given passenger numbers are not projected to recover to anything like pre-Covid levels before the end of 2022, and possibly not fully for some years beyond, carrier and airport all-rounders like Heathrow, along with established freight hubs like East Midland Airport (EMA), will almost certainly increase their market dominance before Manston can even reopen.

The weakness of RSP’s business case on a variety of factors was highlighted by the Planning Inspectorate in its report. Quoting an Avia Solutions assessment, it said: “The UK’s ... exit from the EU leaves a decision to make Manston the location of a distribution network of a major multinational manufacturing or retail group less likely.

“The geographic location of Manston precludes it from being a suitable base airport for an integrator in particular when compared to UK competitors such as EMA.

“An airport focused on airfreight carried by dedicated freighters may be overly exposed to a declining or stagnant total market or, at best, to a market that is not exposed to strong potential.”

And the Inspectorate itself concluded: “The ExA is of the opinion that general air freight would continue to be well served in the UK with spare capacity at Stansted in the short term (to 2030) and the proposed Northwest Runway at Heathrow in the longer term, and that new integrators are more likely to wish to be sited in a more central location.

“New integrators ... would be more likely to base themselves in a more central location to their other logistical operations. The ExA is not convinced that the location of the Proposed Development is entirely favourable.

“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 [RSP] 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.”

These weaknesses are even more pronounced now. Claims that Manston could lead an economic and jobs bonanza in east Kent are even less credible now than they were in 2019. This is enough to drop the scheme alone, without even considering the doubts about RSP’s suitability as an infrastructure partner.

However, as I’m sure the Secretary of State is also aware, the UK is failing to act swiftly enough to meet its own legally-binding climate targets. Air travel is a significant contributor to anthropogenic greenhouse gas emissions – there is a wealth of academic and science-based material out there to confirm this.

---

<sup>5</sup> <https://www.aircargonews.net/data/worldacd-air-cargo-continues-with-some-kind-of-normality-in-april/>

<sup>6</sup> <https://supremefreight.com/the-impact-of-covid-19-on-the-air-freight-industry/>

The Secretary of State no doubt has many experts to consult, but I'll repeat two assessments here.

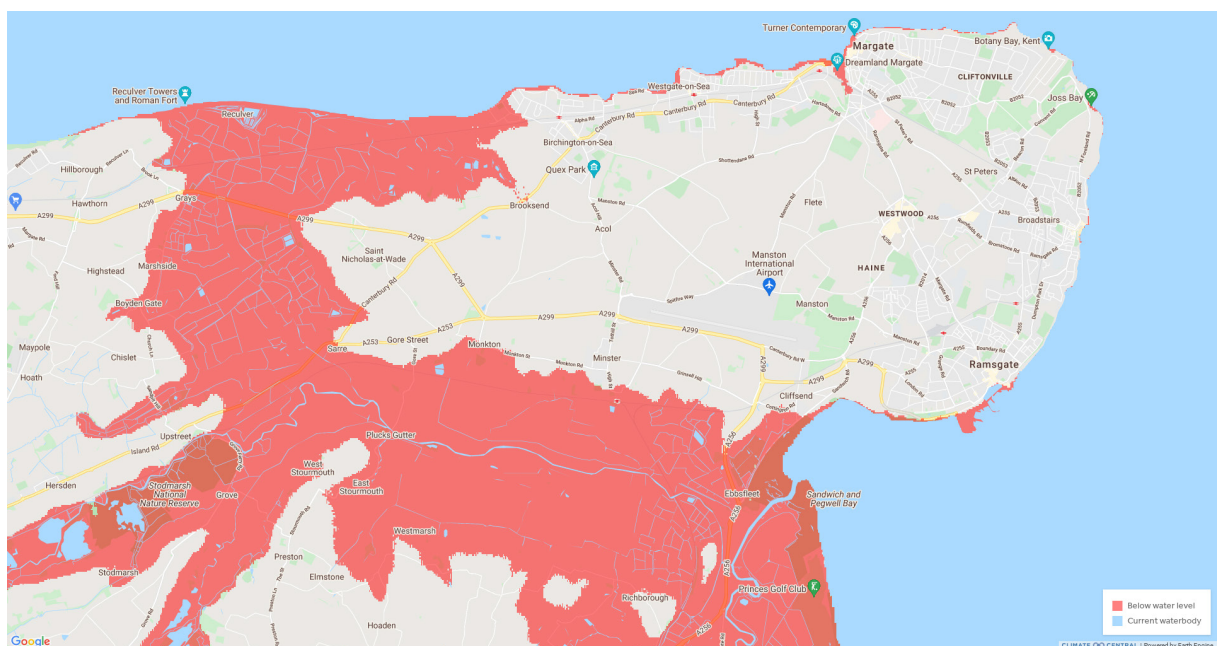
In its 2019 factsheet, *The Growth in Greenhouse Gas Emissions From Commercial Aviation*<sup>7</sup>, the Environmental & Energy Study Institute said: “In the last two decades, carbon dioxide (CO<sup>2</sup>) emissions from commercial aviation worldwide grew at a slower pace than the growth of the industry, but emissions from aviation have accelerated in recent years as increasing commercial air traffic continues to raise the industry’s contribution to global emissions. In 2013, global CO<sup>2</sup> from commercial aviation was 710m tons. In 2017, that number reached 860m tons, a 21% increase in four years, and it climbed another 5% to 905m tons in 2018.

“Globally, aviation produced 2.4% of total CO<sup>2</sup> emissions in 2018. Non-CO<sup>2</sup> effects, such as warming induced by aircraft contrails and other pollutants, bring the combined total contribution of commercial aviation to approximately 5% of the world’s climate-warming problem.”

Obviously, Covid will have had an impact on emissions, but the Climate Change Committee (CCC) is still pretty clear that there must be no net increase in UK airport capacity if the UK is to cut emissions by 78% by 2035, as outlined in the Sixth Carbon Budget. It says aviation demand growth should be constrained through the use of taxes, levies and carbon pricing. In other words, we are not merely talking about pulling the plug on Manston. We shouldn’t be considering a third runway at Heathrow, either, and the ANPS should be updated accordingly.

Perhaps the Secretary of State could also consider how the changing climate is projected to impact Thanet – and, therefore, an airport at Manston – over the next 30 years. In addition to worsening droughts and increasing heat waves, we face the certainty of rising sea levels – there are many scientific and other reputable sources that outline this threat. Under these scenarios, Thanet could become an island again, and in the foreseeable future, as shown in the Climate Central graphic below<sup>8</sup>.

This projected impact on the east Kent coastline might seem far fetched today but, in its 2015



<sup>7</sup> <https://www.eesi.org/papers/view/fact-sheet-the-growth-in-greenhouse-gas-emissions-from-commercial-aviation>

<sup>8</sup> [https://coastal.climatecentral.org/map/13.13158/51.3449/?theme=sea\\_level\\_rise&map\\_type=coastal\\_dem\\_comparison&basemap=roadmap&contiguous=true&elevation\\_model=best\\_available&forecast\\_year=2050&pathway=rcp45&percentile=p50&refresh=true&return\\_level=return\\_level\\_1&slr\\_model=kopp\\_2014](https://coastal.climatecentral.org/map/13.13158/51.3449/?theme=sea_level_rise&map_type=coastal_dem_comparison&basemap=roadmap&contiguous=true&elevation_model=best_available&forecast_year=2050&pathway=rcp45&percentile=p50&refresh=true&return_level=return_level_1&slr_model=kopp_2014)

assessment of the threat, Kent County Council rated the risk as high<sup>9</sup>. In my opinion, if this scenario has any credibility at all, then one has to wonder at the sense of locating a freight hub on the (Isle of) Thanet given it could easily become a stranded asset.

The Secretary of State is obviously unconcerned by the impact a successful Manston Airport would have on Ramsgate's population, air quality and economy, but the real likelihood of increased flooding and, eventually, a new Wantsum channel should at least be the subject of a strategic study. Government ministers should have taken climate change seriously a long time ago, and the need to plan and act accordingly is now very urgent – as the CCC has recently restated.

The strong environmental downsides to a reopened Manston Airport, as well as its poor business case, were obvious back in 2019, yet the Secretary of State still approved the development consent order. His decision was derided by aviation analysts York Aviation and Alan Stratford & Associates, both of which explained this as a victory of politics over hard commercial reality. However, it was the obvious absence of any meaningful environmental assessment that eventually did for the DCO. I hope, but I'm far from confident, that the Secretary of State's call for new submissions is not merely a political fait accompli masquerading as a serious planning process.

Your sincerely

