



8 July 2021

REDETERMINATION OF THE APPLICATION BY RSP LTD FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE REOPENING AND DEVELOPMENT OF MANSTON CARGO HUB IN KENT.

SUBMISSION FROM WRITERS AGAINST MANSTON CARGO HUB

Dear Secretary of State,

We write as residents of the town and a registered Interested Party as we continue to campaign against the reopening of a freight hub at Manston.

There are many writers, employed and self-employed, living in the town. The full effect of the Covid pandemic is still unknown, but since lockdown in March 2020, the number of people moving to the coast has substantially increased and working patterns have undoubtedly changed. While some may return to commuting on HS1, which has transformed the area's life-work potential, many will continue to work from their offices, studios, bedrooms or kitchen tables.

There are journalists, copywriters, content creators, novelists, social media influencers, consultants and others in the creative industries living and working in Ramsgate, supporting the local economy and in many cases, employing local talent. Whatever you do for a living, working online through the pandemic has shown that you need peace and quiet to think.

The prospect of cargo planes overhead would put paid to concentration. When Manston was operating flights before it went bankrupt, decibel readings of 80-100 were recorded. Who could concentrate with noise the equivalent of a large lawnmower in their ears? If RSP were to fulfil their full ATM ambition, this racket would be up to every 10 minutes. The question of night flights continues to be fudged, so there would be no certainty of a decent night's sleep, a fundamental principle under the Human Rights Act.

The flight path is directly over the town at 1000-300 feet, so close that residents could see the pilot's faces as they came into land. With RSP's track record of failure, Mr Freudmann's history of being struck off as a solicitor on 26 counts and frequent reports of outdated cargo aircraft failing, there is little wonder that those who would be most affected are deeply alarmed for the safety of their properties and themselves.

There is a climate emergency, as declared by your Government and our local council, and people have a right to live and work in peace. This is not about NIMBYism, it's about justice, which is why the local community rallied around to support Jenny Dawes' Judicial Review,

digging deep at a time of economic uncertainty to crowdfund lawyers to protect the planet and their own human rights.

In answer to the specific points raised when you sought further submissions into the DCO, following Andrew Stephenson's cavalier overruling of the Planning Inspectors' report:

- * There was never a discernible need for an air-freight operation at Manston, which partially explains its 3x failure in the past. Since 2019, there is no evidence to suggest an increase in need – in fact, the opposite applies.

- * There have been five reports since the closure Manston seven years ago, by aviation experts at Falcon Consultancy, Avia Solutions, Altitude Aviation, York Aviation and Alan Stratford Associates. All conclude that a freight hub at Manston is unviable and unnecessary. In its past incarnation, it failed three times over.

- * The Covid pandemic grounded air traffic all over the world and is far from over. The full impact of both Covid and Brexit is yet to be felt, but airlines are perilously impacted and if there is to be recovery, it will be slow, especially given the vital constrictions of climate change targets, according to Government policy. This is of particular relevance as the eyes of the world will be on the UK at COP26 and beyond.

- * London Heathrow handles over 62% of the UK's cargo tonnage and if the third runway goes ahead, it would increase its capacity to take care of future air capacity demand, further reducing future potential need for cargo capacity at Manston.

- * One of the major factors behind the failure of Manston's operations in the past is its location. Other UK airports are far better situated, with the Golden Triangle between Northampton, Birmingham and Leicester. Stansted, Gatwick and East Midlands are within easy reach, with connecting motorways, there are prime logistics parks on the M1, M6 and M40. Manston is in the extreme corner of East Kent, reached by the A299 dual carriageway (even the M2 is principally dual carriageway), 75+ miles from London. Its geographical situation will always put it at a severe disadvantage compared to other airports.

- * Amazon Air has a base at East Midlands as well as flying into Southend at night. Even if they wanted to explore Manston as a possible location, there would be no opportunities, given RSP's alleged commitment that there are to be no night flights.

- * There is substantial capacity available at East Midlands, our country's second biggest cargo airport. Manchester, Birmingham, Doncaster Sheffield have night availability. RSP's Tony Freudmann talks of hydrogen-powered barges that would take freight from Manston via road to Ramsgate port, where they would then be transported to London to continue their onward journey by lorry. What airline company would be attracted to such a complicated set-up when they could simply fly their cargo into an airport with excellent motorway links in place?

- * In their report to you, PINS concluded: 'the levels of freight the proposed development could expect to handle are modest and could be catered for at Heathrow, Stansted, East

Midlands and others if the demand existed.' All that has changed since their conclusion is the need has reduced. Azimuth/Northpoint's forecasts for air cargo did not take into account GDP decline as a result of Covid-19, nor the full effect of Brexit, which remains to be seen.

* There has been a decline in the global and UK air cargo market since the Covid pandemic. According to CAA statistics, the UK air cargo market declined by 21% on tonnage. Dedicated freight increased when there was a lack of passenger flights, but are now reducing as passenger flights resume. Boeing's air cargo forecast in October 2020 showed a reduction to 4% per year compared to 4.2% in 2018.

* The Sixth Carbon Budget (2020) set a goal to reduce carbon emissions by 78% by 2035. Now that it is part of UK legislation, it will challenge the aviation sector and with increasingly instability regarding the climate, more stringent targets are likely to be imposed regarding emissions. While initiatives to invent electric aircraft are to be welcomed, no one can set a date on when they will replace polluting aircraft worldwide. When green cargo planes have been rolled out, tested and deemed fit for purpose, there will perhaps be an opportunity to propose a cargo airport that does the planet no harm, so long as need can be established in a way it can't now. Until such a time, RSP's boasts that Manston will be a 'green airport' can only refer to the terminal, not the movement of air traffic, and as such are misleading and disingenuous.

* The Government and Thanet District Council have both declared a climate emergency. Demonstrating that the commitment to reducing carbon emissions is genuine would be hard to prove if the Manston DCO were to be granted, in the absence of need. It would be hard to maintain a stance of being 'a world leader' in fighting climate change as Britain hosts Cop 26 later this year.

* RSP's job forecasts at Manston were deemed by the PINS report to be flawed, with incorrect use of employment multipliers and no adjustment for displacement effects. There was an indication that any jobs generated would be more likely at national level than beneficial for Thanet in East Kent. There is a huge need for employment in the area, which has much deprivation, but jobs have to be sustainable. The effect of cargo aircraft a few hundred feet above the historic harbour of Ramsgate would damage the burgeoning tourist trade and put paid to more jobs than it created. In PINS' words: 'The impacts from the construction and operation of the proposed development would adversely affect the tourism industry in Ramsgate.' This has burgeoned since people aren't able to travel freely as a result of the pandemic and Ramsgate has been a welcome visiting place for those seeking clean, fresh air, a beautiful coastline, maritime heritage.

* Since Manston Airport went bust in 2015, employment in Thanet has increased. It is worth noting that fewer than 150 were employed (many on part-time, zero-hour contracts), fewer than at the large Wetherspoon's on the seafront. By Mr Freudmann's own admission when pressed on the reality of the job figures he conjures, cargo operations are increasingly automated. He quotes '800 construction jobs', which are not included due to their short-term nature and neglects to highlight that the catchment radius is 70-90 miles, which means his operation could be staffed by people in London and beyond. People in Thanet need

quality, sustainable jobs and overblown forecasts raise hopes in an unfair and misleading way.

* The feasibility of RSP's plans for airspace changes have yet to meet even stage 2 approval by the Civil Aviation Authority due to 'errors and inconsistencies.' Such scrappiness has been a characteristic of RSP's planning since the start and does little to allay the concerns of residents less than 1000feet under the flight path over its safeguarding and efficiency as the operator of a major freight operation. To say the least.

* Support for RSP's cargo ambition at Manston from airlines, freight integrators and logistics operators has been conspicuous by its absence since July 2019 (let alone earlier this year when it became publicised that your department's decision was to be reassessed). It would be unusual for the Applicant to be silent if such support were in place. If private submissions have been made, it would seem fair to offer Interested Parties the same opportunity as you consider this redetermination.

* Noise levels from planes over Ramsgate in the past have been recorded at 90-100 decibels, similar to a helicopter landing at short range or a chainsaw in full flow. The site at Manston is only 2.5miles from the town and incoming flights are less than 100feet overhead (some 300feet over the large housing estate at Nethercourt). If RSP managed to meet their full application for ATMs, this could amount to six flights an hour. RSP themselves admit it would have a 'significant adverse effect' on Ramsgate, which explains why Jenny Dawes' Judicial Review had an immediate groundswell of local support, as it would do again, in increasing numbers as more and more people continue to move here.

Furthermore, in the interest of national security, the Ministry of Defence's concern over the HDRF sited at Manston cannot be ignored.

Yours sincerely,

Writers Against Manston Cargo Hub