

AMENDED 16:40pm 9/7/2021



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.**

UNIQUE REFERENCE: 20013942

Dear Secretary of State,

I write to you as a resident of Ramsgate and an Interested Party as you redetermine RSP's application to develop the former airfield at Manston into a freight hub.

This matter has been the subject of investigation by the Planning Inspectorate who, after months of detailed research, recommended that the DCO should not be granted. As you recused yourself, it was left in the hands of Andrew Stephenson, whose overruling of PINS' recommendation was overturned by Judicial Review. This was an embarrassing decision and rather like the Seaborne Freight debacle at Ramsgate port, which cost Chris Grayling his job, Manston continues to carry reputational risk.

So here we are, once again having to restate that there is simply no need for an air-freight operation at Manston.

There never has been, there wasn't in 2019, there especially isn't in 2021, and (unless green aviation technology advances exponentially), there never will be.

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

* There have been five detailed reports since the closure of the former airport at 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 100feet 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 1000 feet 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. The effect on residents, home workers (whose number has soared since the pandemic), office workers, doctors and the tourist industry would be nothing short of devastating. 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.

Residents will not sit back and allow the ruination of Ramsgate for a cargo airport the country does not need and the planet cannot afford.

In short, Secretary of State, the need for air cargo at Manston was never identified as credible.

Since July 2019, as outlined above, the quantitative need has substantially reduced.

Yours sincerely,

Christabel Smith