



6th July 2021

To Whom It May Concern

MANSTON AIRPORT DCO REDETERMINATION

I write as a Ramsgate resident and registered Interested Party with my responses to the Secretary of State's questions on the above DCO Redetermination.

After extensive examination of the matter, the Planning Inspectorate in October 2019 advised the Secretary of State against granting the DCO. I believe they were right and that nothing has arisen since that should change that advice – indeed, I would suggest that such changes as have occurred should strengthen it.

1) Current Policies Informing Level of Need:

The Planning Inspectorate's final report on Manston concluded simply that "*the Applicant has failed to demonstrate sufficient need for the Proposed Development*". Since then the following changes have occurred which I believe confirm this conclusion:

Reinstatement of ANPS:

- The approval of a third runway at Heathrow in December 2020 constitutes a material change for Manston. Heathrow already handles over 60% of the world's freight tonnage, and Government figures show a third runway will increase this significantly.
- PINS also points out a clear steer on policy in this area in favour of existing facilities: "*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)*" (PINS report p98)
- These factors combine to reduce still further any need for a cargo hub at Manston.

Climate Emergency Declarations:

- In 2019 both Thanet District Council and Kent County Council declared Climate Emergencies, establishing a policy presumption in both cases against any development that increases carbon emissions in the area.
- The Applicant has been at pains to suggest that the new facility will be 'a green airport' and even 'carbon neutral within 5 years of commencing operations' (Thanet District Council Members' Briefing, July 2021) – but this is disingenuous.
- It will be the terminal buildings alone that are carbon neutral: this will not of course apply to the aviation or the huge numbers of trucks that will be required to shift cargo by road – the only realistic option given Manston's location – which will add considerably to Thanet and Kent's carbon emissions.

Thanet Local Plan:

- Uncertainty regarding options for the airport site has been one factor in the long delay in the production of a Local Plan for Thanet, which was finally adopted in July 2020. The policy statement on Manston reads: *“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.” (SP07)*
- In other words, the reservation of this prime brownfield site for aviation use is dependent on the outcome of the DCO. If this is not granted, its designation will be swiftly reviewed.

2) Changes in quantitative need:

Post-Covid collapse of aviation:

- Air traffic around the world was grounded for a long period as a result of the pandemic, and the effects of this are still being felt, with the Civil Aviation Authority reporting a 21% drop in the tonnage of air cargo handled.
- Although dedicated freight business increased temporarily while passenger flights were grounded, since passenger flights resumed this has dropped again in favour of cheaper and more efficient carriage in bellyhold of passenger planes.
- The anticipated reduction in GDP post-pandemic (- the OBR predicts a 4% drop -) will affect the import-export market and further reduce the need for a freight hub.
- It is noticeable that there has been little interest from airlines or logistics operators to work with Manston since the SoS's announcements last year: if there had been, I am sure the Applicant would have announced it. I believe this speaks for itself.

Cargo capacity at other airports:

- PINS concluded: *“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).”* (PINS report p92) The combined effects of the pandemic and the approval of Heathrow's third runway increase the strength of this conclusion.
- There is spare capacity at Heathrow, Stansted and EMA, which are all existing airports already set up with logistics, warehousing and transport services for freight. The Applicant's business model depends on Manston taking over business from other airports. In the current extremely competitive market, this is highly unlikely.
- Moreover, the Applicant cannot change Manston's location – ideal for the RAF during the War, but inappropriate for a peacetime operation, as three previous failed attempts to run it as a commercial airport show. Manston is bordered on three sides by sea, it has limited space for logistics and fulfilment operations, its road links are poor (requiring negotiation of 2-lane A roads and then the M25 to reach London) and any potential rail and ferry links also depend in the first instance on the inadequate road network. Most of its competitors are much better situated.
- Manston is not included in the eight new Freeport sites announced recently. These include the East Midlands, incorporating East Midlands Airport. All of these sites can be reached more easily from other airports than from Manston.

3) Need to have regard to the sixth carbon budget:

- According to the European Commission climate website, *“If global aviation were a country, it would rank in the top 10 emitters”* of greenhouse gases, showing it is vital for us to limit the negative impacts of aviation on our climate.
- The Government’s sixth carbon budget is the world’s most ambitious climate change target, committing us in law to cutting emissions by 78% by 2035 in comparison with 1990 levels.
- Later this year the UK will be hosting COP26. Our commitment and credibility as a nation will be judged by how we are meeting these challenging commitments.
- After a long legal battle, the Government has approved the third runway at Heathrow – a retrograde step with regard to the carbon budget, and a potential embarrassment for the Government at COP26.
- Manston, which if approved will require 1.9% of the UK aviation carbon budget for 2050, constitutes a problem for the carbon budget, as its full allocation has already been taken by existing providers.
- Aside of aviation, some 75% of carbon emissions from transport come from road traffic. As well as increasing aviation emissions, the Applicant’s business model will necessarily significantly increase road transport emissions in East Kent as fuel is trucked into a new aviation site and cargo is trucked out again. The possibility described by the Applicant for transporting cargo down the Thames by electric barge (of which only one prototype is yet in use) is sadly far distant in the future.
- PINS concluded that the Proposed Development *“will have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets”* and for that reason *“concludes that this weighs against the granting of development consent”*.

4) Any other matters arising since July 2019:

- Since July 2019 the Applicant has reduced its job projections, which PINS queried, from some 23,000 to 2,150 after 5 years of operation. While this figure appears somewhat more realistic than the tens of thousands of jobs originally predicted, it is still extremely ambitious, given that jobs at Manston as a commercial airport have never exceeded 500 in the past, aviation is in decline and we now have challenging carbon emission targets enshrined in law.
- Meanwhile, however, employment has increased in Thanet since the airport last closed, and tourism jobs in particular have mushroomed. These jobs are threatened in Ramsgate by the prospect of planes flying over the Royal Harbour at a height of a few hundred feet every 12 minutes throughout the day – so for every job created by the Applicant’s Proposed Development, it appears likely that a job may well be lost in the (much more sustainable) tourism sector.

For this and the other reasons given above, as well as the many other reasons outlined in my previous submissions, I would urge the Secretary of State to accept the Planning Inspectorate’s well-considered expert advice and reject the DCO.

Regards,
Tricia Austin