

From: [REDACTED]
To: [Manston Airport; transportinfrastructure@dft.gov.uk](mailto:transportinfrastructure@dft.gov.uk)
Subject: Redetermination of Manston Airport DCO - Interested Party response
Date: 09 July 2021 20:44:59

Dear Sir/ Madam

Please find below my response to the SoS's request for further representations to facilitate his redetermination of this application.

Regards
Tricia Austin

Cllr Tricia Austin, Central Harbour Ward

Redetermination of DCO for Manston Airport: Response to Secretary of State for Transport

I am writing as a Green Party Councillor for Central Harbour ward in Ramsgate to respond to the Secretary of State's request for further representations on this matter.

Need: After extensive hearings, PINS concluded in October 2019 that: *"the Applicant has failed to demonstrate sufficient need for the Proposed Development"*.

In my view, this should have ended the discussion: if the Applicant cannot demonstrate sufficient need for the development, surely the proposal fails? This does not appear to be the case, however.

Locally, it is widely suggested that this is the result of pressure on the SoS from our two local MPs – a disturbing suggestion and one that reflects badly on a Government already mired in concerns about undue influence in, for example, Covid procurement processes. I hope the SoS will act swiftly in a way that scotches such rumours.

Since PINS reported, the need for the proposed development has further reduced due to:

- 1) Impact of Covid on aviation: The Covid pandemic grounded most passenger aircraft for some months, resulting in a short-term uptick in dedicated freight flights. But bellyhold freight operations are much cheaper, more efficient and generate fewer emissions overall, and these have quickly picked up since passenger flights resumed. However, aviation has taken a huge hit as a result of the pandemic: the CAA reports a reduction of over 20% in volumes. It appears unlikely that previous ATM levels will be achieved for some time, if ever, with the OBR predicting a 4% reduction in GDP affecting imports and exports. (At Stansted, the nearest established freight-handling airport, the recent Public Enquiry reduced the number of cargo ATMs as a result of reduced demand.) While all of this has to be good news for the climate, it is clearly bad news for the Applicant.
- 2) ANPS reinstatement: As a Green Councillor I disagree profoundly with the Supreme Court's approval of a third runway at Heathrow, which is wholly inappropriate in the light of our carbon commitments. However, from a local perspective this is helpful as the potential for even greater capacity at Heathrow (which already processes over 60% of global freight by tonnage) reduces still further any possible need for a freight hub at Manston.
- 3) Developments at other airports: Manston is permanently disadvantaged as a result of its far South Eastern coastal location, which does not permit 360 degree onward transport, space for fulfilment houses or speedy rail or motorway links. East Midlands Airport, by contrast, is located centrally in the country and has just been included in a new East Midlands Freeport scheme. Heathrow is due to expand substantially and there is spare capacity at other established airports too. The Applicant's business plan depends on gaining business from other airports, but in

such a highly competitive market it is difficult to see how this can be achieved.

Benefits:

1) Jobs: The one aspect of the application in which PINS saw some benefit was in jobs, as we have a history of unemployment in Thanet. However, the Applicant's original predictions (of some 23,000 jobs, I believe) were understandably queried by PINs. The Applicant's jobs projection has now been reduced to a somewhat more realistic 2,150 after 5 years of operation. However, even this appears optimistic, since as a commercial operation as the airport has never generated more than 500 jobs and has failed three times.

2) Impact on health and education: Even if jobs are generated by the Applicant's proposals, they come at a great cost. To meet the requirements of a DCO, the Applicant has to generate ATMs equivalent to one flight at low altitude over the historic town of Ramsgate every 12 minutes throughout daylight hours. The Applicant's own documentation accepts that this means 'significant adverse effects' for the town, and also for the neighbouring town of Herne Bay and the Stourside villages. 'Adverse effects' are likely to include severe noise and particulate pollution, resulting in immediate severe disruption and longer term negative impacts on health, welfare and education. Thanet is an area that already suffers poor health and achieves poor educational outcomes and cannot afford to suffer these further negative impacts. My previous submissions include substantial further evidence on these issues.

3) Impacts on tourism: We are an area that depends on tourism, and in recent years the number of jobs generated in tourism and hospitality in Thanet has shown a significant and very welcome increase. Our recent Levelling Up Fund bid concentrates on training and jobs in tourism, and we hope for increased visitor numbers as a result of the emphasis on 'staycations' this year. However, as the Applicants themselves acknowledge, visitors are much less likely to want to spend time in a town blighted by 4 or 5 cargo plane movements at a few hundred feet above sea level every hour. PINS recognise this: *"(T)he amenity impacts from the construction and operation of the Proposed Development would adversely affect the tourism industry in Ramsgate."* This will negate all our hard work in building up our tourism and hospitality sector, and is likely to reduce the numbers of these sustainable jobs with training to below previous levels – a huge frustration for the whole community!

Sixth Carbon Budget:

The SoS also asked how far he should 'have regard to' the sixth carbon budget, which finally commits us to taking account of emissions from international aviation, and which rightly sets very challenging goals. Clearly it is vital that the SoS takes full account of his Government's legally binding commitments – which pose a serious problem for this application. The 1.9% of the carbon budget that would be required for the Manston development is already allocated to existing, established airports – and it is clear that airport growth must be curtailed if these targets are to be met. Moreover, as PINS point out, *"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)"*, which should result in a presumption in favour of existing airports over new ones.

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"*.

I cannot but agree, and for all the reasons above I strongly urge the SoS to reject the DCO application.

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