

June 9<sup>th</sup> 2021

No Night Flights Submission regarding the recent request by the Secretary of State for new information pertaining to Manston.

No Night Flights was formed over 10 years ago when Infratil was planning to incorporate night flights into their existing flight schedule. We have then been aware of the need for night time flying to allow cargo flights to become profitable and time effective. Having looked closely at the proposed flight plan, business model and all other data relating to the DCO put forward by RSP we are aware of the need to use night time slots to increase the interest of potential carriers and ensure that costs are met. Therefore we are against the DCO on the grounds that the business case does not match the reality of freight patterns as they stand and are unconvinced that night time flying will not be needed.

We are also against the proposals for a cargo hub at Manston for various other reasons. One of which is that there has never been shown sufficient need to make the case for a cargo hub in the south east corner of Kent. Kent County Councils recent proposal for Freeport status could not include Manston, as it did not have, and still does not have a CAA licence. Therefore all needs of any Freeport area are met within the original proposal. The Thames Gateway one being mainly serviced by Essex, with carriers and ports serviced by more accessible arterial roads and being nearer to more of the country than this corner of Kent. Indeed, various reports have been commissioned from Thanet District Council, to National Government and each one reads that Manston would never be profitable due to its location and the fact that the business it would need to attract would be above and beyond what it is capable of, and by doing so would impact on other airports amongst other things. With existing airports already planning expansion this would seem illogical financially and bring into bear the problem of decreasing emissions throughout the airline industry as well as reaching local and national government targets.

With our previous submissions we had included data on noise, with real life evidence of what this means to residents in the flight path. Let's not forget that Manston is less than a mile away from the runway, and at 4 miles away from that you are in the Channel. High coastal winds create flight paths that need to be direct, cargo planes fly only 300ft above some houses and the level of noise despite being averaged out for the aviation industry is very acute in real life. We also produced reports on the job figures that were suggested, commented on the business model, where we explain that there is no real link between spend, custom and profit and highlighted the loss of jobs and revenue for the area should the proposal be granted. We ask you to re-read that data, as that has not changed.

It is not for us to comment on Covid, or Brexit, we see no difference in the amount of freight coming into the country other than how it is coming in and for cargo only flights that were commissioned due to the lack of passenger ones at the time, these will revert back as life resumes to the level of passenger planes there were before. Bellyhold being the cheaper option. Yet we will draw your attention to local matters; 11<sup>th</sup> July 2019 Thanet District Council declared a climate emergency. Various funding bids have been successful to regenerate Ramsgate, in particular the maritime aspect. Housing is now being forced onto greenfield sites as Manston is not an option as a brownfield site, despite only being reserved for aviation use in the current local plan until the DCO is

finalized. The CAA wrote to RSP stating its findings on the Develop and Assess proposal, see attached.

No Night Flights strongly object to the continuing of the DCO and see no relevant changes to make the business case work. We implore the Secretary of State to look at the Planning Inspectorate's conclusion, made after in depth knowledge from experts and locals who gave factual data of what life would mean living with the detrimental effects of a cargo hub. Health, mental health and quality of life are not a bargaining tool for the promise of jobs, with the emphasis being on promise, because if there is one change that the Secretary of State should be asking for proof of it's the financial backing and credible business plan, along with need. That we would all like to see.



## MANSTON AIRPORT (FASI SOUTH)

### Develop & Assess Gateway Outcome - 26<sup>th</sup> March 2021

[STATEMENT]

As part of 'Stage 2 – Develop & Assess' of the CAP1616 airspace change process, the UK Civil Aviation Authority has completed a Develop & Assess Gateway Assessment of RiverOak Strategic Partners (RSP) airspace change proposal (ACP) – Manston Airport FASI-South (ACP-2018-75).

In order for the CAA to allow an ACP to pass through the Develop & Assess Gateway:

1. the change sponsor must have produced a comprehensive list of airspace change design options;
2. the change sponsor must have engaged with relevant stakeholders to explore those options to the CAA's satisfaction against the requirements in Appendix C;
3. the change sponsor must have produced a design principle evaluation that the CAA has accepted, showing how its design options have responded to the design principles;
4. the change sponsor must have produced an Initial options appraisal (phase I);
5. the CAA must have produced and then published an assessment that the options appraisal is satisfactory against the requirements in Appendix E.

In our Gateway Assessment, the CAA concluded that the submission did not meet Criterion 3 and Criterion 5 above for the reasons set out below:

1. **Criterion 3 (Design Principles Evaluation):** The development of the baseline ("Do-Minimum") scenario and comparative assessment of the suggested Design Options against the Design Principles contained errors and inconsistencies which did not evidence clearly that the Design Options had been adequately assessed against the Design Principles. (CAP 1616 - Step 2A Para 128 and Para E21).
2. **Criterion 5 (Initial Options Appraisal):** In Step 2B, the presentation of the Options Appraisal (which built on Step 2A) contained errors and inconsistencies which did not allow us to conclude that it had been correctly undertaken. (CAP 1616 - Step 2B Para 133 and Appendix E Para E12).
3. **Criterion 5 (Initial Options Appraisal):** The Options Appraisal did not take account of all environmental assessment requirements associated with an ACP that has potential to alter traffic patterns below 7,000 feet (CAP1616 - Appendix B Para B12).

The Civil Aviation Authority has informed the change sponsor of this decision. In line with CAP1616, the change sponsor is now able to reconsider its submission before resubmitting it for further review by the Civil Aviation Authority at a future Develop & Assess Gateway.

It is important to note that whether an ACP passes a gateway successfully or not does not predetermine the CAA's later final decision on whether to approve the airspace change proposal. This decision is not an explicit or implicit comment on the merits or otherwise of this ACP. This will come at the decision-making stage (Stage 5).

[END STATEMENT]