

**From:** [REDACTED]  
**To:** [Manston Airport](#)  
**Subject:** Manston Airport DCO Redetermination Ref: TR020002 - Matter 2  
**Date:** 06 July 2021 20:44:05  
**Attachments:** [Do we have a new air cargo regime, post Covid .pdf](#)

---

***For the Attention of the Manston Airport Case Team,***

Dear Manston Airport Case Team,

**TR020002 – representation to the Secretary of State for Transport – Matter 2**

**Dr. Beau Webber. Chairman, Save Manston Airport association (SMAa).**

**Re-determination of the Application by RiverOak Strategic Partners Limited (“the Applicant”) for an Order granting Development Consent for the reopening and development of Manston Airport in Kent.**

**Statement of Matters**

In the Department for Transport’s Statement of Matters letter dated 11<sup>th</sup> June 2021 it invited Interested Parties to make further representations on 4 matters. This representation will look at:

“whether the quantitative need for the Development has been affected by any changes since 9 July 2019, and if so, a description of any such changes and the impacts on the level of need from those changes (such as, but not limited to, changes in demand for air freight, changes of capacity at other airports, locational requirements for air freight and the effects of Brexit and/or Covid)”.

**Do we have a new air cargo regime, post Covid, that Manston Airport could help facilitate ?**

Post Covid do we have a new regime, where consumers are expecting un-constrained availability of rapid delivery air-cargo items, that is radically different from the situation pre-Covid ?

Please see attached pdf.

Thanking you,

Kind regards.

Dr. Beau Webber  
Chairman, Save Manston Airport association

## TR020002 – representation to the Secretary of State for Transport – Matter 2

**Dr. Beau Webber. Chairman, Save Manston Airport association (SMAa).**

### **Re-determination of the Application by RiverOak Strategic Partners Limited (“the Applicant”) for an Order granting Development Consent for the reopening and development of Manston Airport in Kent.**

SMAa has over 3,700 members who are in full support of the Development Consent Order to reopen Manston Airport, many wanting jobs for themselves, their family or other Kentish people. Thus, we wish to make further representations to assist in the re-determination of the DCO.

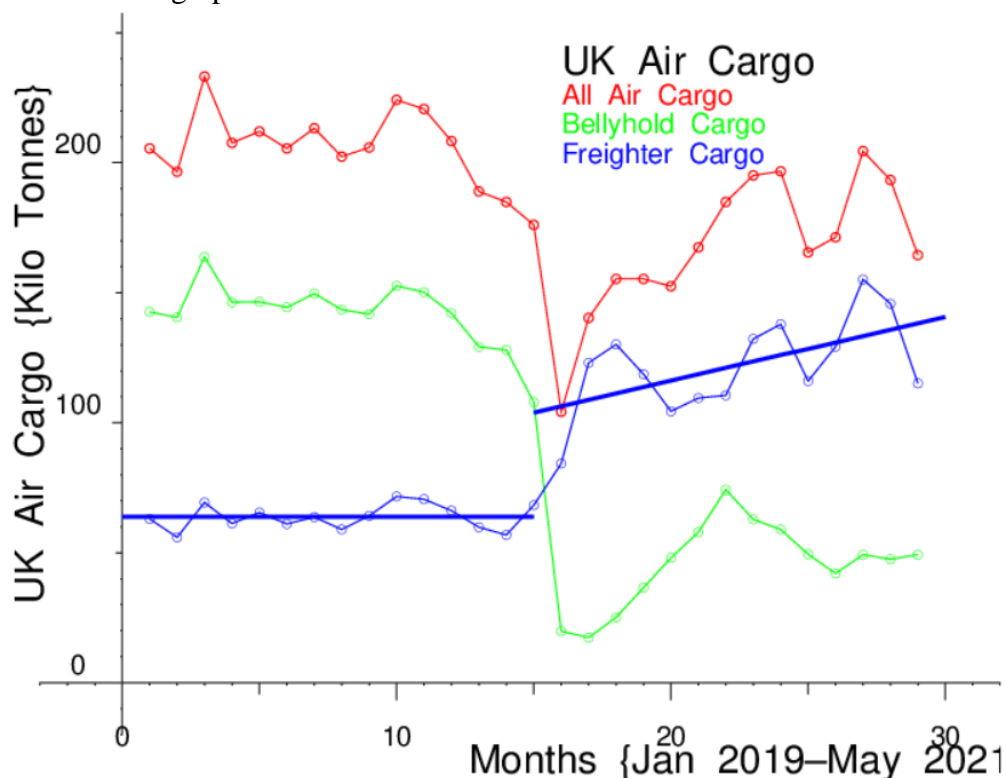
### **Statement of Matters**

In the Department for Transport’s Statement of Matters letter dated 11<sup>th</sup> June 2021 it invited Interested Parties to make further representations on 4 matters. This representation will look at:

“whether the quantitative need for the Development has been affected by any changes since 9 July 2019, and if so, a description of any such changes and the impacts on the level of need from those changes (such as, but not limited to, changes in demand for air freight, changes of capacity at other airports, locational requirements for air freight and the effects of Brexit and/or Covid)”.

#### **Do we have a new air cargo regime, post Covid, that Manston Airport could help facilitate ?**

Post Covid do we have a new regime, where consumers are expecting un-constrained availability of rapid delivery air-cargo items, that is radically different from the situation pre-Covid ? And we are currently in Brexit Stage 1 (Controls on Exports) and are facing Brexit Stage 2 next January (Controls also on Imports). If we plot the CAA figures for “Table\_15\_Freight\_by\_Aircraft\_Configuration” for January 2019 to May 2021, (Appendix A), we obtain this graph :



We see that pre-Covid the amount of cargo carried in freighter aircraft was fairly constant. SMAa have good evidence that South of the Thames this was primarily due to a significant constraint on the availability of air-cargo capacity, with significant amounts of freight being trucked to and from airports on the Continent [ref: AirlinesUK].

However post-Covid, and with the introduction of Brexit export controls we appear to have entered a new regime for air-freighter cargo, with the upward slope being an increase of 2,500 Tonnes per month, or 30 kilo-tonnes per year.

The current paucity of passenger aircraft in the air has had two key effects on air-cargo :

1) fewer passenger planes means less bellyhold cargo capacity

2) fewer passenger planes means a higher slot availability for freighter planes.

– the graph shows that there has been a significant immediate switch from bellyhold to freighter planes, for much of this UK cargo.

But a clear second effect is the steady increase in demand for freighter air cargo. An immediate question is as to how long this upwards trend can continue ?

Causes for this are a matter for discussion, but it is clear that there has been a transition in the public's use of and expectations from e-commerce delivery of goods.

When major e-commerce firms start buying multiple new freighter planes :[ref: AirCargoNews 2021-06-25, ref: AirCargoNews 2021-06-23], Airports and Seaports add more cargo handling capacity [ref: AirCargoNews 2021-06-16, ref: AirCargoNews 2021-06-11] and airlines start converting passenger planes to freighters [ref: AirCargoNews 2021-06-09], it is clear that experts in air-freight expect this up-turn to last more than a few months In fact it is difficult to see any reasons, world-wide, not to expect the up-turn to continue.

In the UK, however, we are likely to return, in the South, to a situation of limited landing and unloading slots for freighters, particularly as there is good evidence that slot availability at Stansted may decrease from 20,500 to possibly as low as 6,000 movements per year [ref: Stansted]. Also the likelihood of Heathrow next runway both being increasingly delayed and unlikely to offer many slots for dedicated freighters [ref: Heathrow].

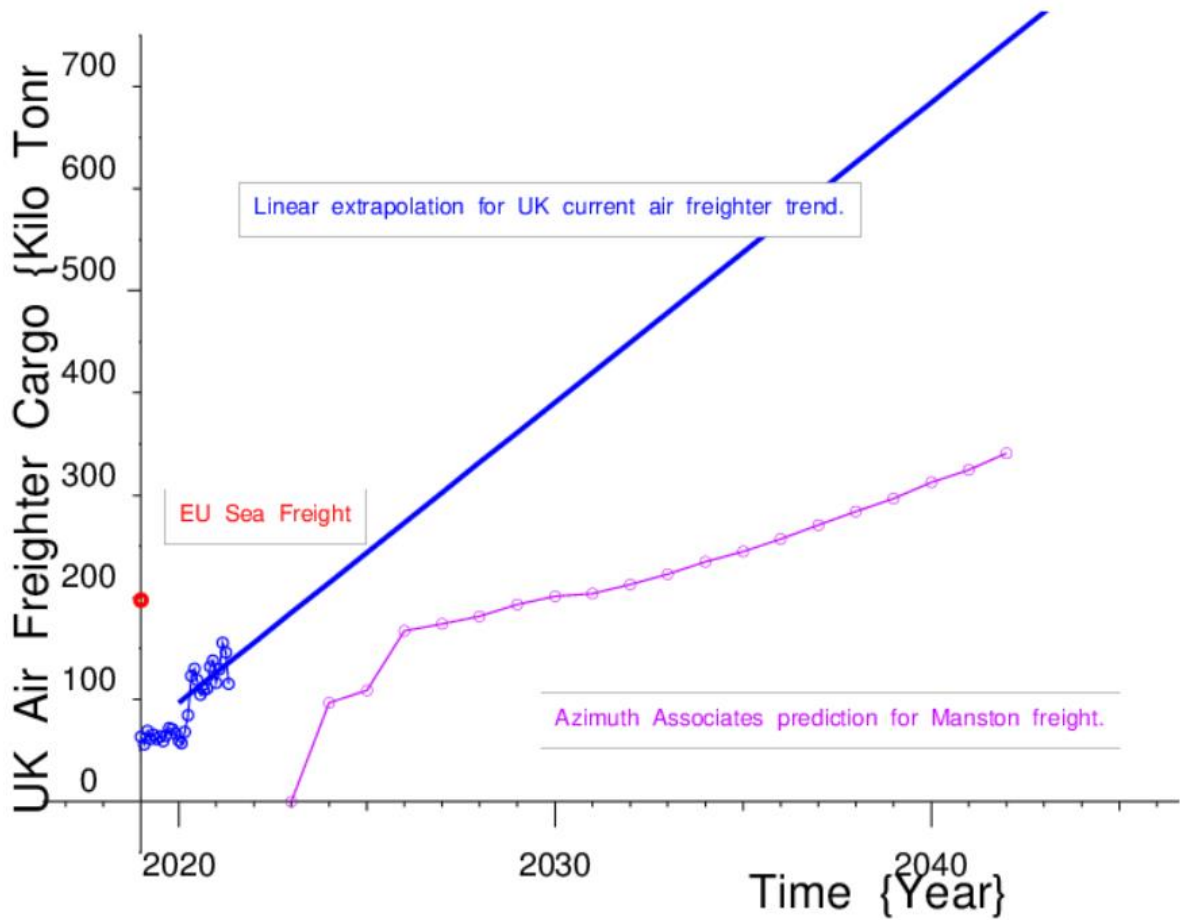
Manston Airport is hopefully just coming on stream at a time when it will most be needed for air freighter capacity.

If we extrapolate the current linear increase in freighter air cargo tonnage and compare it with the predictions in the DCO for expected cargo handling at Manston Airport (in purple) [Appendix C] we see that the demand may well be there.

Clearly we can question how long this linear increase will continue, but equally clearly industry leaders are currently buying and converting planes for cargo use.

And that, in the absence of such UK constraints, this is the sort of freighter air-cargo that we could expect ?  
**Azimuth Associates' DCO Manston Airport prediction is in mauve:**

# Manton Airport Freighter Comparison



## Appendix A :

<https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-Airport-data/>

CAA\_Data\_Bellyhold\_Freighter

Tonnes of cargo.

Year Month BellyHold Freighter

2019	1	142565	63043
2019	2	140584	56047
2019	3	163855	69280
2019	4	146284	61279
2019	5	146491	65507
2019	6	144345	61117
2019	7	149622	63704
2019	8	143470	58947
2019	9	141754	64211
2019	10	152625	71662
2019	11	150134	70623
2019	12	142040	66226
2020	1	129169	59826
2020	2	128061	56801
2020	3	107875	68210
2020	4	19915	84315
2020	5	17322	123090
2020	6	25185	130130

2020	7	36604	118758
2020	8	48053	104463
2020	9	57908	109583
2020	10	74329	110640
2020	11	62844	132292
2020	12	58882	137929
2021	1	49460	116008
2021	2	42067	129271
2021	3	49243	155180
2021	4	47539	145785
2021	5	49231	115199

## Appendix B.

EU Sea Freight, Tonnage, 2019 :

### Department for Transport Statistics

[Port Freight Statistics](#)

#### Table PORT0204

UK major port traffic by route and cargo type (filter by direction and year)

<https://www.gov.uk/government/statistical-data-sets/port-and-domestic-waterborne-freight-statistics-port>

## Appendix C.

Forecast Manston Airport Freight Tonnage :

7.4 Azimuth Report Volumes 1to 4 TR020002/APP/7.4

Volume 4, Table 4 :

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-002459-7.4%20-%20Azimuth%20Report.pdf>

Table 4 Forecast job creation

	Freight tonnage	Passenger numbers	Direct jobs	Indirect/induced jobs	Catalytic jobs	Total job creation
Y1	0	0	116	0	0	116
Y2	96,553	0	856	1,542	0	2,398
Y3	108,553	662,768	1,551	2,791	6,203	10,545
Y4	167,092	679,868	2,085	3,753	8,341	14,179
Y5	173,741	686,672	2,150	3,870	8,601	14,621
Y6	181,436	965,295	2,466	4,438	9,862	16,766
Y7	192,908	975,591	2,576	4,638	10,306	17,520
Y8	200,673	975,591	2,645	4,762	10,581	17,988
Y9	203,245	975,591	2,668	4,803	10,673	18,143
Y10	212,351	975,591	2,749	4,948	10,996	18,693
Y11	222,377	1,011,587	2,812	5,062	11,249	19,124
Y12	234,508	1,049,022	2,890	5,202	11,561	19,653
Y13	244,690	1,087,954	2,947	5,305	11,789	20,042
Y14	256,989	1,128,444	3,018	5,432	12,072	20,522
Y15	270,579	1,170,553	3,094	5,570	12,378	21,042
Y16	283,904	1,214,347	3,164	5,695	12,656	21,515
Y17	296,594	1,259,892	3,224	5,802	12,894	21,920
Y18	312,344	1,307,259	3,301	5,942	13,205	22,448
Y19	324,838	1,356,521	3,349	6,029	13,397	22,775
Y20	340,758	1,407,753	3,417	6,151	13,668	23,235

**Ref: AirlinesUK :**

<https://airlinesuk.org/wp-content/uploads/2018/10/Assessment-of-the-value-of-air-freight-services-to-the-UK-economy-Final-Report-v22-Oct-2018-b-SENT.pdf>

Trucked freight

2.24

Alongside the business models described above, a significant amount of air freight is transported in customs-bonded trucks between the UK and continental Europe and is classified as air freight with an assigned flight number. Freight is often flown to continental Europe, particularly from Asia, as there is often more available air freight capacity than to UK airports, partly due to lack of available slots for freighter aircraft at Heathrow. The freight is trucked as bonded freight to avoid having to undergo local customs procedures so that importers only need to deal with the UK customs authorities rather than investing in systems to deal with multiple customs authorities. This represents an inefficiency from the perspective of the UK economy as whole. See also the Case Study on consumer electronics imports at the end of this chapter.

2.25

In contrast to goods from Asia, Heathrow stated that goods destined for North America are also often trucked to the UK, in particular Heathrow, from continental Europe ...

**Ref: AirCargoNews 2021-06-25 :**

## **FedEx to add freighters and boost spending to meet demand**

25 / 06 / 2021

By Damian Brett

FedEx will boost spending over the coming year and add more freighter orders to meet growing e-commerce demand.

Announcing its results full-year results for fiscal year ended May 31, the express giant said it expected to spend around \$7.2bn in FY 2022 compared with around \$5.9bn last year.

Meanwhile, FedEx will exercise options to purchase 20 additional B767Fs, 10 for delivery in fiscal year 2024 and 10 for delivery in fiscal year 2025.

The investments will also include 16 new automated facilities and the implementation of nearly 100 expansion projects at its ground division.

“To handle future ground volumes, we are significantly increasing capacity to deliver both, great service and improved financial results,” chairman and chief executive Fred Smith said.

“This summer, we are intently focused on improving network and delivery operations prior to the volume surge in the fall.”

Looking to the air cargo market, FedEx said that trade volumes have surpassed pre-pandemic levels and are on course for the fastest year of growth in over a decade.

It said that global air cargo capacity remained down 10% year-on-year in April as a result of lower bellyhold capacity. ....

**Ref: AirCargoNews 2021-06-23**

## **Qatar Airways “hungry” for more freighters**

23 / 06 / 2021

By Damian Brett

Qatar Airways is “hungry for more freighters” as it considers its options for future orders of all-cargo aircraft.

Speaking at the Qatar Economic Forum hosted by Bloomberg, Qatar Airways chief executive Akbar Al Baker said that for the last two years, excluding FedEx and UPS, the airline had been the largest freight carrier in the world and growth had accelerated during the pandemic.

Al Baker said the carrier would like to order more freighters but there is a wait for slots at Boeing. He said that the airline would also like to be the launch customer for either the proposed B777X freighter or the A350 freighter.

“We are really hungry for more freighters,” Al Baker said. “Unfortunately David [David Calhoun, president and chief executive of The Boeing Company] cannot produce for us more B777F, the earliest he can give me is in 2023.” .....

**Ref: AirCargoNews 2021-06-16 :**

## **Philadelphia Airport expands its airfreight facilities and capabilities**

16 / 06 / 2021

By Rachelle Harry

Philadelphia International Airport (PHL) is expanding its air cargo facility by 136 acres and will almost triple its airfreight warehousing space.

To support its expansion and cargo handling capabilities, PHL has formed a partnership with Aviation Facilities Company (AFCO) and has also become a member of TIACA.

PHL’s expansion plan includes the construction of cargo buildings totaling more than 1m sq ft, bringing its cargo building coverage to 1.4m sq ft.

The hub has also been approved to construct more than 5m sq ft of taxiway and apron pavement to accommodate increased aircraft operations.

PHL has already invested \$90m through airport revenue bonds and some small grants to enable the development of the site. These projects include an environmental assessment, a \$30m wetlands mitigation project, the construction of a \$40m aircraft parking apron and the \$22m relocation of a 1-mile stretch of road that currently bisects the property. ....

**Ref: AirCargoNews 2021-06-11 :**

# Ostend Airport, Port of Zeebrugge and Versluys to develop air-sea logistics platform

11 / 06 / 2021

By Rachelle Harry

Belgium's Ostend-Bruges International Airport, Port of Zeebrugge, and warehousing firm Versluys Logistics, have teamed up to develop a digital freight platform for air and sea logistics.

The platform will offer solutions across the air-sea supply chain and will enhance Belgium's freight capabilities as a gateway to and from Europe.

Versluys Logistics is currently building a 16,000 sq m warehouse at the airport's Cargo Village.

Bart Versluys, chief executive of Versluys Groep, the parent company Versluys Logistics, commented: "Due to the corona crisis and the strong growth of e-commerce, the demand for logistics real estate has increased significantly.

"The exclusive agreement we concluded last year with the airport of Ostend-Bruges gives us the unique opportunity to grow into a leading player in this rapidly evolving market segment. After all, high-quality logistics warehouses around airports are extremely popular. ....

**Ref: FlightGobal 2021-06-09 :**

## AirAsia's first dedicated freighters to begin operations in Q3

09 / 06 / 2021

By Alfred Chua, FlightGlobal

AirAsia will operate its first dedicated cargo aircraft — a Boeing 737-800 — in the third quarter of the year, as the low-cost giant doubles down on expanding in the region's cargo market.

The aircraft, operated by AirAsia logistics unit Teleport from its Bangkok hub, will join two Airbus A320s that are currently being converted into temporary freighters by having seats removed. ....

### **Ref: Stansted Airport**

Prior to the appeal decision, Stansted had a passenger cap of 35 million passengers per annum (mppa) and an ATM cap of 264,000 (Passenger ATM 243,500 & Cargo ATM 20,500).

In 2019 there were approximately 28 mppa and 202,000 ATMs including nearly 12,000 cargo ATMs<sup>2</sup>. To reduce the likelihood of delays, it is desirable for an airport to operate at a demand/capacity ratio below 0.83. Bearing this in mind the data indicates that, at present there is capacity at Stansted to accommodate some additional freighter traffic.

However, this limited capacity is predicted by MAG to be short-lived. According to their Planning Statement for application UTT/18/0460/FUL, they state that passenger ATMs:

"are forecast to increase from 152,000 in 2016 to just over 253,000 movements by 2028".



This would leave even more limited slots for dedicated freighters and certainly not enough for the 17,000 freighter ATMs specified in the Manston DCO.

Following the appeal decision 26th May 2021, the Cargo ATM cap was reduced to 16,000 from 20,500 with passenger throughput rising from 35 million passengers per annum (mppa) to 43 mppa.

Using the 2019 passenger numbers (28,304,744) and passenger ATMs (174,657) there were, on average 162 passengers per ATM. Using this figure, 43 mppa would require 265,432 passenger ATMs.

Even using the projected MAG figure of 170 passengers per flight<sup>5</sup> (it was 160 in 2016), 43 mppa would require 252,941 passenger ATMs. It should be noted that this increase to 170 passengers per flight is dependent on a number of factors including a change of fleet to larger aircraft. All the necessary changes are likely to be phased over a number of years and Stansted may not achieve the 170 figure. This will result in a higher passenger ATM being required

Since the overall ATM cap (including other ATMs) will remain at 274,000 ATMs per year, this increase in passenger ATMs can only happen with a reduction in cargo ATMs and other ATMs (there were 15,175 other ATMs in 2019).

This inevitably will result in slots for dedicated freighters becoming increasingly limited particularly at the peak times for passenger flights in the morning and evening. The situation will be made even worse because of the current focus on increasing restrictions on night flights.

These restrictions and resulting lack of available slots imposed on Air Cargo Airlines indicate that Stansted is not the “most appropriate means of meeting that need”.

The evidence demonstrates that for the maximum Cargo ATMs availability is shrinking and must continue to fall because of the clear intention of MAG to increase passenger numbers. Depending on three scenarios the % reduction in the maximum Cargo ATMs available (currently 20,500) range from a Minimum 22% reduction (to 16,000) to a maximum of 71% reduction (to 6,000).

## **Ref: Heathrow**

“The opening of the 3rd Runway will see an increase in ATMs and will result in an increase in the availability of air freight capacity at the airport. This will mainly be in the availability of more ‘belly hold’ capacity rather than through a significant growth in dedicated air cargo flights”.

In 2018 Heathrow handled 93,231 tonnes of freight in dedicated freighters and in 2019, 83,757 tonnes which represent 5.5% in 2018 and 5.3% in 2019 of the total freight tonnages handled by Heathrow<sup>12</sup>.

This is less than the tonnes of freight predicted for Manston in year 2 of operation.

(see Appendix C)

The original opening of R3 was 2026 but due to legal challenges, CAA rulings on funding, COVID etc. this date has been pushed back considerably.

In the Arcadis report for the CAA it highlighted a number of factors that could delay the opening date for R3.

“Much of this work is outside of the airport’s existing boundary and will be reliant on gaining the appropriate consents, acquiring land and working with other agencies or organisations. This could create a level of risk to the programme that HAL may not be able to mitigate”.