

From: [REDACTED]
To: [Manston Airport](#)
Subject: Manston Airport DCO submission
Date: 29 June 2021 12:14:09
Attachments: [Manston \(Final submission\) PDF.pdf](#)

For the Attention of the Manston Airport Case Team.

I write in response to a letter issued on 11th June 2021 by the Transport Infrastructure Planning Unit inviting interested parties to submit further representation concerning the re-determination of the Development Consent Order at Manston Airport.

I have already submitted several representations giving my views on this application, made by RiverOak Strategic Partners Ltd., during the Public Inquiry conducted by the Examining Authority. Those representations remain valid and can be found under my name on the Planning Inspectorate website. My reference MANS-S57179

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipcsection=docs>

I remain opposed to the granting of a DCO and the proposed development of a Cargo Hub as outlined in the application.

I declare an interest as I live in Ramsgate on the Nethercourt Estate directly under the flight path less than 1.5km from the end of the runway.

Keeping to the matters outlined in the letter I draw attention to the Airport National Policy Statement (ANPS June 2018) which states;

2.3 The UK benefits from a strong and substantially privatised airport sector, with a regulatory system that supports growth while ensuring the interests of passengers are at its heart. The Government believes that this is the right approach for the airport sector, but that Government has an important role to play in strategic decisions like planning future airport capacity.

This section clearly highlights the UK already benefits from a strong airport sector that supports growth. It further shows passenger traffic drives those benefits. It is passenger traffic that drives demand and consequently provides the cargo capacity via belly-hold space.

2.4 The UK has the third largest aviation network in the world after the USA and China, and London's airports serve more routes than any other European city.

Section 2.4 highlights how London and the Southeast already provide adequate capacity for both passengers and cargo.

*2.7 Air freight is also important to the UK economy. **Although only a small proportion of UK trade by weight is carried by air,** it is particularly important for supporting export-led growth in sectors where goods are of high value or time critical.*

Section 2.7 shows how small a contribution airfreight provides to trade and the movement of goods. Only being used for high value or time critical goods.

It is clear from the ANPS report that aviation is driven by the demand for passenger routes and freight is accommodated only as an additional revenue source. The air freight industry has been disrupted with the recent COVID-19 pandemic leading to the cancellation of a huge number of flights due to safety concerns and a fall in the number of passengers. With

the removal of belly-hold space with the majority of passenger planes grounded. The urgent demand for airfreight, PPE and vaccines, was still met as carriers continued to utilise available passenger planes for that purpose.

The application submitted by RiverOak shows freight to be central to their development with passenger capacity forming only a small market that may or may not be developed at a later date. They make no claim to utilising belly-hold capacity in any future passenger services. Brexit has not increased a need for air cargo but the intransigence of the EU has put hurdles in the way and restricted the free flow of freight.

2.12 Aviation demand is likely to increase significantly between now and 2050. All major airports in the South East of England are expected to be full by the mid-2030s, with four out of five full by the mid-2020s.

What a difference a few years make. Manston Airport has been closed since 15th May 2014. Since then there has been no discernible economic effect to UK aviation. No concerns have been expressed. No crisis has developed requiring emergency powers to recreate a response mirroring the Berlin Airlift of 1948. Goods continue to be transported without Manston's meagre contribution.

Manston airport is not a Nationally Significant Infrastructure as RiverOak claim. Outside the immediate area of East Kent few have even heard of it.

The fact the airport has been closed for nearly eight years without any economic impact either locally or nationally shows there is no need for it to reopen.

Far from being full, airports in the South East, and elsewhere are struggling to survive due to the impact of Covid. Carriers are going out of business or seeking emergency subsidies. Several airports that had plans to expand have put developments on hold.

Airportwatch: May 23, 2020

The Covid crisis and the dramatic cut in demand for air travel means airport expansion projects will not be going ahead any time soon. As much as £1bn of capital investment is now on ice, deferred or cancelled, according to analysis by Construction News. Heathrow's plans for a 3rd runway are now delayed, if not entirely cancelled. Heathrow had a capital expenditure budget of £1.1 billion for 2020, but this has been cut to about £450 million. Of that it had already spent £224m on capital works in the 1st quarter of 2020. That means far less work for construction firms. Gatwick says it is deferring its capital expenditure plans "for the foreseeable future". Birmingham Airport is delaying a £30m extension of its terminal indefinitely, even though ground was broken on the project at the start of the year. Edinburgh Airport has said expenditure on some projects would be deferred. Longer-term projects have also been hit. Luton Airport says it would no longer submit its DCO for the construction of a 2nd terminal in June, with no new date given. There is no detail of plans for Manchester and Stansted airport works. There will be jobs lost in the construction sector, with more competition for what work there is.

Travel company Cirium found that 43 commercial airlines have failed in 2020 so far, compared to 46 in all of 2019 and 56 throughout 2018. The effect of the pandemic is so great that larger airlines have also been badly hit in this environment, said Robert Morris of Cirium.

The UK Civil Aviation Authority lists the following recent airline failures.

Stobart Air (12 June 2021)

Flybe (5 March 2020)

Thomas Cook Airlines Ltd (23 September 2019)

WOW AIR (28 March 2019)

FlyBMI (17 February 2019)

Cobalt Air (17 October 2018)

PRIMERA AIR GROUP (1 October 2018)

FLYVLM (31 August 2018)

Recently it was announced that the third runway at Heathrow was on hold. Sir Howard Davies who led the Airport Commission review in 2015, said that the Covid crisis had undermined the economic case for a third runway. While still backing Heathrow for any expansion in the South East he questioned whether that capacity will be needed anytime within the next five or ten years. (*The Telegraph & The Times*, 16th June 2021).

With this background it is hard to see any need for Manston to reopen.

The proposal to open a hub cargo airport at the extreme edge of Kent miles from any manufacturing base and without adequate transport infrastructure appears to be optimistic in the extreme.

So what lies behind this application? Manston has never made a profit for any of the owners since being sold by the RAF in 1998. First sold to the Wiggins Group who launched scheduled flights to twenty one destinations in Europe using a low cost carrier EUJet. Trading as Planestation it collapsed into administration in 2005 leaving 5,400 passengers stranded.

It was then bought from the administrators by Infratil Ltd who lost between £40 - £50 million over the next nine years. With projections to achieve over one million passengers per annum it failed to achieve half that number. Similarly its ambitious plan to grow freight traffic also failed.

To prevent further losses Infratil offloaded the airport to Lothian Shelf Ltd owned by Ann Gloag for £1 in November 2014.

(Kent County Council Report "Manston Airport under private ownership" March 2015)

Ann Gloag sold-on the site in 2014 to Stonehill Park who planned to build 4,000 homes on the site. Due to the failure of Thanet council to update the Local Plan and the lack of decision on Manston those houses were subsequently allocated to be built on green field land.

Throughout the DCO Public Inquiry Stonehill Park opposed the application. Finally, at the eleventh hour and as the inquiry was ending Stonehill Park sold their interests to RiverOak for £16.5 million.

Throughout this time one man, Tony Freudmann, has been a central figure, starting with his involvement as a principle player in the Wiggins Group.

Growth Business Co UK analysis in September 2004 stated;

Over the past ten years the group, previously known as Wiggins, has raised more money – north of around £115 million – than its actual market valuation. With this cash it built up an international chain of seven (hitherto largely dormant) airports and an assortment of property interests and assets in the UK. Apart from property disposals, it has generated little in the way of revenues, milked its investor base for all they were worth and produced gargantuan annual losses – in the past 48 months alone it has lost more than £73 million.

Martin May, brought in to save the company said; ‘When I came here, we were spending money to no particular end. Last year, we spent £11 million maintaining dormant airports. The previous year, £13.5 million. Planestation has been one of the most woeful ventures ever to grace the London Stock Exchange.

<https://www.growthbusiness.co.uk/planestation-turnaround-from-hell-198/>

<https://publications.parliament.uk/pa/cm200506/cmselect/cmtran/636/5110212.htm>

It was Tony Freudmann, as Senior Vice President, who was instrumental in persuading Wiggins Group, a building company, in investing in defunct military airfields. He was also instrumental in the failed attempt to establish flights between Manston and Virginia in America back in 2006. The plug was pulled on that after poor ticket sales. Kent County Council lost £300,000 in the venture.

In 2014 Freudmann offers to buy Manston from Ann Gloag but his offer is rejected. He then represents RiverOak Investment Inc., an American real estate company in approaching Thanet District Council in an attempt to obtain a Compulsory Purchase Order for the airfield. The CPO was rejected twice by TDC under two separate administrations.

Having failed to gain TDC support for a CPO RiverOak decided to try under section 122-134 of the Planning Act 2008 and apply for a Development Consent Order which includes provision to grant Compulsory acquisition powers as part of the DCO.

RiverOak Investments Inc. pulled out of the process and a new company was incorporated by Tony Freudmann in 2016 called RiverOak Strategic Partners Ltd. This company has no trading history and no premises but exists purely as a vehicle to progress the DCO application.

To qualify for a DCO it is necessary to fulfil certain criteria. For an airport the applicant must show an intent to increase capacity by 10 million passengers or 10,000 air cargo movements. It was under this legislation that Manston claimed to be a Nationally Significant Infrastructure Project (NSIP). Manston has otherwise no claim to being Nationally Significant in any way.

Likewise RiverOak gave 10,000 air cargo movements as their target purely to meet the minimum needs of the DCO requirements. Throughout the DCO inquiry they failed to show where these flights would come from or who would operate them.

It must be remembered their intent throughout was to obtain ownership of the site either by compulsory purchase with TDC help or via compulsory acquisition through the DCO process.

As they have since purchased the land from Stonehill Park for £16.5 million just as the DCO inquiry ended, the need for a DCO is considerably diminished.

The business plan to develop a cargo hub at such a remote location at Manston

was always weak with no realistic chance of success. The airport has never turned a profit at any time in its history.

RiverOak business plans can be compared to the American sports fantasy “Field of Dreams” “If you build it (they) will come”. Who and why is not addressed.

Sadly RiverOak’s dreams peddled by Tony Freudmann are equally flawed. Throughout the DCO inquiry they failed to convince the examiners and for that reason the examiners concluded the application should be refused.

Full details of their findings can be found in their final report.

MANSTON AIRPORT: TR020002

REPORT TO THE SECRETARY OF STATE FOR TRANSPORT: 18 OCTOBER 2019

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf>

Tony Freudmann is a fantasist and is happy to pursue those fantasies with the aid of other peoples money. Of the many companies he has been involved in few if any have proved viable.

RiverOak Strategic Partners (RSP) state on their website “RSP has committed to an investment of £300 million to rebuild Manston as a global freight hub”. They have never revealed where this money is, or where it is coming from.

Lawyers acting for RiverOak Strategic Partners (RSP) submitted a request to the Planning Inspectorate asking that the identity of investors not be put into the public domain during the on-going inquiry examining its case to take control of the site.

A search of the RiverOak group of companies show no sign of this money so it appears, to progress the project, approaches will have to be made to raise the funds on the open market.

RSP Quote- “As far as funding for the main project is concerned, in line with almost all projects this is not secured at present but will be if the DCO is granted, in this case through equity and debt financing.”

<https://theloadstar.com/planning-inspector-raises-doubts-over-whether-riveroak-has-adequate-funding-to-buy-manston-airport/>

Even with the £8.5 million donated by the Dept for Transport in compensation for the perceived delay to the project due to using the site as a lorry park there is a considerable shortfall. (On top of the £18.5 million paid to Stonehill Park).

Any investors will be hard to find with the current state of the aviation industry and any found will expect a reasonable return on their investment. A lack of financial backers is a serious impediment to the viability of the project.

In relation to air pollution, at the Public Inquiry RSP claimed the latest air quality controls predated the DCO application so they should not influence the application.

Tony Freudmann was interviewed on BBC Radio Kent and dismissed claims there was a government policy to change UK emission levels to 78% by 2035 and claimed they were “Aspirational” only.

(22 July 2021 10am Julie George BBC Radio Kent)

It may suit RSP to ignore the governments commitment to reduce emissions but it is hard to see how they can sidestep them when the government has committed to a reduction in emissions of 78% by 2035, based on the Committee's 2020 advice on the Sixth Carbon Budget.

Green MEP and air quality campaigner, Keith Taylor, has slammed RiverOak Strategic Partners' (RSP) consultation on plans to re-open Manston Airport over the firms 'astonishing ignorance' on air pollution.

In the [Environmental Impact report](#), RSP claims:

- *There is 'scientific uncertainty about the health effects of NO₂' emissions*
- *'NO_x is not believed to have impacts on human health'*

Both claims are "at best, deliberately misleading, at worst, factually incorrect", according to Mr. Taylor, a member of the European Parliament's Environment and Public Health Committee.

Keith Taylor the Kent MEP said: "It is truly astonishing that a firm trying to demonstrate its ability to run an airport can be so wilfully ignorant of the facts on the UK's air pollution crisis."

On the firm's first claim, Keith says:

"Not only is the evidence for the negative health impacts of NO₂ pollution clear, it is becoming stronger and stronger every day. In the UK, NO₂ pollution alone is linked to the premature deaths of [more than 20,000 people every year](#). Additionally, The [World Health Organisation warns](#) that NO₂ 'at the concentrations currently measured across Europe' is linked to both asthma in children and reduced lung function in adults."

On the firm's second claim, he adds:

"It takes an utter disregard for accuracy and/or a complete lack of scientific awareness to ignore the fact that [NO_x is a generic term](#) covering various nitrogen oxide air pollutants including nitric oxide (NO) and nitrogen dioxide (NO₂) -- which brings us back to RSP's first bogus claim."

Mr Taylor concludes:

"This consultation is filled with misleading and incorrect claims about the environmental and health impacts re-opening Manston Airport will have on the local communities, countryside and biodiversity."

"At best, RSP is incompetent and scientifically illiterate, at worst, it is wilfully trying to mask the true extent of damage of their environmentally-destructive plans. On these grounds alone, this pitiful excuse for an environmental impact report should be rejected out of hand."

"Ultimately, Manston Airport isn't, wasn't and never will be either economically nor environmentally viable, it's time for the prospective developers and Thanet District Council to finally be honest about that."

A further recent [study](#) has revealed more detail of the effects of air pollution beneath flight paths that are particularly relevant to Ramsgate on the approach to Manston.

Pre-Covid, researchers from Tufts University in Massachusetts, US, parked their mobile laboratory in the driveway of a house near Logan international airport in Boston. The colonial-style wood-frame house dated from the 1920s when the airport was a [muddy military airfield](#). Located on a peninsular with no through roads, the area was quiet in traffic terms and air pollution was very low when the winds blew from the sea.

But pre-pandemic, the airport had more than 1,000 flights per day, many passing above the rooftop. When wind blew from the airport, 1.3km away, nitrogen dioxide was greater than that measured next to busy roads in the Boston area.

As the planes passed overhead the amount of [ultra-fine particles](#), smaller than the wavelength of visible light, increased by nearly five times. Being indoors offered little protection; it only reduced concentrations by about 20%. Ultra-fine particles inside the house still were greater than concentrations measured close to busy roads.

Oddly, landing aircraft had a greater impact than those taking off. This may have been due to the low approach heights and vortices that form under aircraft wings swirling pollution to the ground.

<https://pubs.acs.org/doi/10.1021/acs.est.0c01859>

The Climate Change Committee, the government's official advisory body has proposed a cap on passenger numbers to meet Boris Johnson's decision to set the UK on the path to net zero emissions by 2050. The government must decide whether to incorporate this into law, or to explain why it is rejecting the advice. (*The Sunday Times 14th February 2021*)

Action to improve the nation's resilience is failing to keep pace with the impacts of a warming planet and increasing climate risks facing the UK. That is the conclusion of a comprehensive independent assessment led by the Climate Change Committee (CCC) which considered a catalogue of risks and opportunities affecting every aspect of life in the UK. (*CCC 16th June 2021*)

Since the DCO inquiry the Government has raised their commitment to air quality control and reducing emissions to also include international aviation. It is inconceivable that the government would approve the development of a cargo hub at Manston without giving due consideration to the adverse climate impact.

The Sixth Carbon Budget – Aviation; states that the UK set its Sixth Carbon Budget (i.e. the legal limit for UK net emissions of greenhouse gases over the years 2033-37) to require a reduction in UK emissions of 78% by 2035 relative to 1990, a 63% reduction from 2019. This will be a world-leading commitment, placing the UK decisively on the path to Net Zero by 2050 at the latest, with a trajectory that is consistent with the Paris Agreement. Freight flights are included within DfT trajectories, so are implicitly assumed to scale with CCC passenger profiles. <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Aviation.pdf>

A report published in May 2021 by the New Economics Foundation "Turbulence Expected - The Climate Cost of Airport Expansion" They compare a number of UK airports including NSIP's They recommend;

- The Secretary of State should call in all of the currently active airport planning applications and assemble a more robust and precautionary evidence base on climate change issues. This evidence can be measured against the forthcoming aviation decarbonisation strategy and the government's new 2035 emissions target, which is expected to include international aviation emissions. In addition, the government will need to demonstrate how the proposed expansions can be reconciled with the Climate Change Committee's recommendation of a no net-expansion policy on airports.*
- The Department for Transport (DfT) should ensure a more robust evidence base is assembled for the appraisal of future airport expansions, including in the case of future NSI proposals, all of which are expected to involve significant climate impacts. This should include tighter guidelines and expectations on the integration of non-CO2 climate impacts, and the monetisation of said impacts.*

<https://neweconomics.org/2021/05/turbulence-expected>

Additionally, I would refer to the lack of progress RSP are having in obtaining an airport licence, currently lodged with the Civil Aviation Authority. In order for Manston airport to become operational, RiverOak will require a number of separate approvals from the CAA, including those for aerodrome and air traffic management safety and airspace change. These processes will include noise pollution and are at an early stage and at present only the airspace change process has been formally initiated.

"Following advice from the CAA, RSP will re-evaluate the supporting documentation with a view to submitting the documents to the CAA for a further Stage 2 Gateway Assessment in the near future and progressing the ACP to the next stage which will involve a full public consultation."

The CAA has previously made a direct response to the SoS for Transport re this matter.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005291-Civil%20Aviation%20Authority.pdf>

The examining authority - PINS - recommended that the DCO not be granted. The four inspectors, who held a public inquiry last year, consider that the levels of freight that the airport would be expected to handle to be “modest” and could be accommodated by existing airports, such as Heathrow, Stansted and East Midlands Airport (EMA).

They considered that the “development appears to offer no obvious advantages to outweigh the strong competition that such airports offer. The ExA has therefore concluded that the applicant has failed to demonstrate sufficient need for the development, additional too (or different from) the need which is met by the provision of existing airports.”

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf>

<https://www.thanet.gov.uk/wp-content/uploads/2020/04/Thanet-Local-Plan-Report-Final-22.03.20-1.pdf>

In 2016 Thanet District Council commissioned a report from Avia Solutions into the viability of Manston. The report entitled “Commercial Viability of Manston Airport” they concluded it was not viable. Nothing has changed, if anything circumstances have got worse;

8.1. Introduction

In this chapter we draw together the conclusions of our research and analysis to form our conclusions, specifically to opine on whether there is a realistic prospect of a financially viable airport operating on the Manston Site.

8.2. Summary

It is AviaSolutions view that having considered the stakeholder interviews and independent research and analysis into historic accounts and ‘reasonable’ adjustments for one-off costs that there is little prospect of a financially viable airport on the site.

The only circumstances in which we believe the airport may be viable is that in which no new runway were developed in the South East of England. However, this scenario presents extreme risk to the investor, as a decision to increase runway capacity at those not physically constrained (e.g. legally constrained LHR and STN) could be made at any time, or a new runway may be authorised at any time in the future.

8.3. Stakeholder Interviews

Our stakeholder interviews were split between those focused upon passenger development and those focused upon freight development. The range of interviews provided an understanding from the industry as to their position on the airport.

Our passenger service interviews suggested that overall there is little interest in serving the airport, in particular from airlines that had previously served the airport such as Flybe. There was some limited interest from airlines such as Ryanair and KLM, who would consider the airport as part of their standard UK market review, however they were not actively seeking to serve the airport. It is our view that we must consider this in light of its context; for an airline that bears no risk in an airport’s reinstatement and for whom its reinstatement may present upside risk, it would be illogical to rule out the possibility of serving it. Overall, our interviews suggested there was very limited interest in the airport for passenger services thus suggesting a long term viable passenger service may be difficult to sustain.

Our freight interviews indicated that the demand to use the airport for freight was very limited. This, in large parts, is due to two factors; the infrastructure investments that have already been made by the industry around Heathrow and Stansted, and the geographical location of the airport. Infrastructure, and the associated knowledge, skill and supporting industry at airports such as Heathrow and Stansted, as well as the major European hubs such as Frankfurt, and Paris, would be almost impossible for Manston to replicate. The geographic location of the airport, tucked into the corner of the UK, cannot compete with airports such as East Midlands for Integrator services that are sold as fast delivery, due to the increases in surface transportation times. The interviews did however indicate that charter services and ad-hoc freighter flights would certainly return, providing some revenue income for the airport. In summary, we conclude that freight would return to the airport in limited quantities, not dissimilar to the tonnage previously processed at the airport.

8.4. Simulations

AviaSolutions’ models provided simulations of the financial performance of an airport on the site under different demand scenarios. These scenarios were developed with a positive view of the potential demand profile, unit revenue and unit cost and investment costs. Two simulations (LHR3 and LGW3) suggested that the airport was unlikely to generate profits at an operational level (EBITDA) until circa FY2025, and that these profits would remain muted through until FY2040. The EBITDA profile suggests that, based on recent industry exit multiples, it would not be possible to recover the initial

equity through a sales process at this point. Furthermore, these scenarios suggest that retained earnings would not turn positive for 15 to 20 years, thus limiting the ability of an investor to recover their costs of equity. In summation, these scenarios present very large risks with small returns over a long time horizon.

https://www.thanet.gov.uk/wp-content/uploads/2018/03/Final-Report-for-TDC-Manston-Airport-Viability-2016_2.pdf

While the airport site has no national significance, any decision will have a major impact on the future of Thanet and East Kent. Its future has rumbled on for many years and recently necessitated the intervention of the SoS for Housing to force through an updated local plan, the first since 2006. Matters were not helped by the continual change of leadership in the council over recent years. Manston airport has been one of the main sticking points throughout.

The newly adopted Local Plan still leaves open the future of Manston Airport, as the decision of the SoS for Transport and the re-determination of the DCO is awaited. The main objective of the Local Plan remains the same - to meet the housing and other needs of local people, to protect the environment for the long term, and to address the impact of climate change. To that end the council has declared a Climate Emergency, and the Plan recognises the impact of climate change on all of us. The adoption of this Plan marks a significant step forward in that endeavour.

<https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-Local-Plan-July-2020-1-1.pdf>

The rapid spread of Covid around the world highlighted how the aviation industry was a major contributor to the spread of the pandemic. The world has changed, and people are now realising the impact of jumping on an airplane for none essential travel. It is now necessary for Government to reflect that concern by ensuring the climate change emergency is adequately addressed.

Lockdown measures have led to a record decrease in UK emissions in 2020. (down 48% below 1990 levels) Emissions fell by around 13% overall **with the largest falls in aviation (-60%)**, shipping (-24%) and surface transport (-18%).

However, the fall in emissions in 2020 will have practically zero impact on the UK's past and future contribution to global warming. (*Climate Change Committee June 2021 'Progress in reducing emissions' 2021 Report*)

The Climate Change Committee state; The approaching COP26 Conference (Nov 2021 Glasgow) demands a step change in Government action, but it is hard to discern any comprehensive strategy in the climate plans we have seen in the last 12 months. There are gaps and ambiguities. Climate resilience remains a second-order issue, if it is considered at all. We continue to blunder into high-carbon choices. Our Planning system and other fundamental structures have not been recast to meet our legal and international climate commitments.

Lack of ambition for aviation demand management would result in higher emissions of 6.4 MtCO₂e/year in 2030 relative to the CCC pathway for aviation emissions. In light of the UK's new Net Zero target, the Government has committed to a new consultation on aviation decarbonisation in 2021, followed by a Net Zero aviation strategy before COP26.

A commitment to include international aviation and shipping emissions within the Sixth Carbon Budget has now been made by the Government.

Two years ago, the UK was aiming to reduce emissions to at least 80% below 1990 levels, by 2050. (from 48% below 1990 levels in 2020). As of 2019, the emissions reduction goal for 2050 is now at least 100% ('Net Zero') and the Government has committed to a reduction in emissions of 78% by 2035, based on the Committee's 2020 advice on the Sixth Carbon Budget.

The UK already has more than enough capacity to accommodate the demand increases in our Balanced Net Zero Pathway. Our advice in the Sixth Carbon Budget was therefore that there should be no net expansion of UK airport capacity, unless the sector is on track to sufficiently outperform its net emissions trajectory and can accommodate the additional demand:

Outperforming the net emissions trajectory means making significant progress on nascent and untested technologies like hybrid electric planes, and developing and scaling up markets for sustainable aviation fuels (SAF) and greenhouse gas removals.

- *It is not possible to have certainty today over the pace of development of these technologies in future. It is therefore difficult at present to justify capacity expansion on the basis of outperforming the emissions trajectory, particularly given the uncertainty around the permanence of impacts on aviation demand from COVID-19.*

The Department for Transport (DfT) has yet to set out any plans for limiting growth in aviation demand. No recognition that demand needs to be managed and several policies (e.g. proposed Air Passenger Duty reductions and airport expansion) are encouraging growth in the sector. Passenger-kilometres travelled per person have been increasing (pre-COVID-19) faster than can be accommodated in the CCC pathway.

*CCC Recommendations require the DfT to; Assess the Government's airport capacity strategy in the context of Net Zero and any lasting impacts on demand from COVID-19, as part of the aviation strategy. **There should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory and can accommodate the additional demand.** A demand management framework will need to be developed (by 2022) and be in place by the mid-2020s to annually assess and, if required, control sector GHG emissions and non-CO2 effects.*

It is clear the government is committed to reducing emissions. It would be hard for any minister to go against that commitment and approve the DCO application for an airport that is not needed and in such a remote location as Manston.

Whatever the decision taken, it is hoped the government do not repeat the Seabourne ferry fiasco inflicted on Ramsgate when Chris Grayling awarded a contract to a ferry company with no ferries and a website plagiarised from a takeaway restaurant.

It was Chris Grayling who originally accepted the Manston DCO even though questions were raised by the Planning Inspectorate about the validity of the application requiring a second submission.

The Shadow Transport Secretary Mr McDonald said there were "clearly major doubts" as to whether the proposal constituted a Nationally Strategic Infrastructure Project, which is a requirement for a DCO.

For the above reasons I oppose the granting of this DCO application.

Submitted by email prior to the 9th July 2021 deadline

By James Hose

A large black rectangular redaction box covering the signature of James Hose.

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Keeping to the matters outlined in the letter I draw attention to the Airport National Policy Statement (ANPS June 2018) which states;

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Section 2.7 shows how small a contribution airfreight provides to trade and the movement of goods. Only being used for high value or time critical goods.

It is clear from the ANPS report that aviation is driven by the demand for passenger routes and freight is accommodated only as an additional revenue source. The air freight industry has been disrupted with the recent COVID-19 pandemic leading to the cancelation of a huge number of flights due to safety concerns and a fall in the number of passengers. With the removal of belly-hold space with the majority of passenger planes grounded. The urgent demand for airfreight, PPE and vaccines, was still met as carriers continued to utilise available passenger planes for that purpose.

The application submitted by RiverOak shows freight to be central to their development with passenger capacity forming only a small market that may or may not be developed at a later date. They make no claim to utilising belly-hold capacity in any future passenger services. Brexit has not increased a need for air cargo but the intransigence of the EU has put hurdles in the way and restricted the free flow of freight.

2.12 Aviation demand is likely to increase significantly between now and 2050. All major airports in the South East of England are expected to be full by the mid-2030s, with four out of five full by the mid-2020s.

What a difference a few years make. Manston Airport has been closed since 15th May 2014. Since then there has been no discernible economic effect to UK aviation. No concerns have been expressed. No crisis has developed requiring emergency powers to recreate a response mirroring the Berlin Airlift of 1948. Goods continue to be transported without Manston's meagre contribution.

Manston airport is not a Nationally Significant Infrastructure as RiverOak claim. Outside the immediate area of East Kent few have even heard of it.

The fact the airport has been closed for nearly eight years without any economic impact either locally or nationally shows there is no need for it to reopen.

Far from being full, airports in the South East, and elsewhere are struggling to survive due to the impact of Covid. Carriers are going out of business or seeking emergency subsidies. Several airports that had plans to expand have put developments on hold.

Airportwatch: May 23, 2020

The Covid crisis and the dramatic cut in demand for air travel means airport expansion projects will not be going ahead any time soon. As much as £1bn of capital investment is now on ice, deferred or cancelled, according to analysis by Construction News. Heathrow's plans for a 3rd runway are now delayed, if not entirely cancelled. Heathrow had a capital expenditure budget of £1.1 billion for 2020, but this has been cut to about £450 million. Of that it had already spent £224m on capital works in the 1st quarter of 2020. That means far less work for construction firms. Gatwick says it is deferring its capital expenditure plans "for the foreseeable future". Birmingham Airport is delaying a £30m extension of its terminal indefinitely, even though ground was broken on the project at the start of the year. Edinburgh Airport has said expenditure on some projects would be deferred. Longer-term projects have also been hit. Luton Airport says it would no longer submit its DCO for the construction of a 2nd terminal in June, with no new date given. There is no detail of plans for Manchester and Stansted airport works. There will be jobs lost in the construction sector, with more competition for what work there is.

Travel company Cirium found that 43 commercial airlines have failed in 2020 so far, compared to 46 in all of 2019 and 56 throughout 2018. The effect of the pandemic is so great that larger airlines have also been badly hit in this environment, said Robert Morris of Cirium.

The UK Civil Aviation Authority lists the following recent airline failures.

Stobart Air (12 June 2021)

Flybe (5 March 2020)

Thomas Cook Airlines Ltd (23 September 2019)

WOW AIR (28 March 2019)

FlyBMI (17 February 2019)

Cobalt Air (17 October 2018)

PRIMERA AIR GROUP (1 October 2018)

FLYVLM (31 August 2018)

Recently it was announced that the third runway at Heathrow was on hold. Sir Howard Davies who led the Airport Commission review in 2015, said that the Covid crisis had undermined the economic case for a third runway. While still backing Heathrow for any expansion in the South East he questioned whether that capacity will be needed anytime within the next five or ten years. (*The Telegraph & The Times, 16th June 2021*).

With this background it is hard to see any need for Manston to reopen.

The proposal to open a hub cargo airport at the extreme edge of Kent miles from any manufacturing base and without adequate transport infrastructure appears to be optimistic in the extreme.

So what lies behind this application? Manston has never made a profit for any of the owners since being sold by the RAF in 1998. First sold to the Wiggins Group who launched scheduled flights to twenty one destinations in Europe using a low cost carrier EUJet. Trading as Planestation it collapsed into administration in 2005 leaving 5,400 passengers stranded.

It was then bought from the administrators by Infratil Ltd who lost between £40 - £50 million over the next nine years. With projections to achieve over one million passengers per annum it failed to achieve half that number. Similarly its ambitious plan to grow freight traffic also failed.

To prevent further losses Infratil offloaded the airport to Lothian Shelf Ltd owned by Ann Gloag for £1 in November 2014.

(Kent County Council Report "Manston Airport under private ownership" March 2015)

Ann Gloag sold-on the site in 2014 to Stonehill Park who planned to build 4,000 homes on the site. Due to the failure of Thanet council to update the Local Plan and the lack of decision on Manston those houses were subsequently allocated to be built on green field land.

Throughout the DCO Public Inquiry Stonehill Park opposed the application. Finally, at the eleventh hour and as the inquiry was ending Stonehill Park sold their interests to RiverOak for £16.5 million.

Throughout this time one man, Tony Freudmann, has been a central figure, starting with his involvement as a principle player in the Wiggins Group.

Growth Business Co UK analysis in September 2004 stated;

Over the past ten years the group, previously known as Wiggins, has raised more money – north of around £115 million – than its actual market valuation. With this cash it built up an international chain of seven (hitherto largely dormant) airports and an assortment of property interests and assets in the UK. Apart from property disposals, it has generated little in the way of revenues, milked its investor base for all they were worth and produced gargantuan annual losses – in the past 48 months alone it has lost more than £73 million. Martin May, brought in to save the company said; 'When I came here, we were spending money to no particular end. Last year, we spent £11 million maintaining dormant airports. The previous year, £13.5 million. Planestation has been one of the most woeful ventures ever to grace the London Stock Exchange.

<https://www.growthbusiness.co.uk/planestation-turnaround-from-hell-198/>

<https://publications.parliament.uk/pa/cm200506/cmselect/cmtran/636/5110212.htm>

It was Tony Freudmann, as Senior Vice President, who was instrumental in persuading Wiggins Group, a building company, in investing in defunct military airfields. He was also instrumental in the failed attempt to establish flights between Manston and Virginia in America back in 2006. The plug was pulled on that after poor ticket sales. Kent County Council lost £300,000 in the venture.

In 2014 Freudmann offers to buy Manston from Ann Gloag but his offer is rejected. He then represents RiverOak Investment Inc., an American real estate company in approaching Thanet District Council in an attempt to obtain a Compulsory Purchase Order for the airfield. The CPO was rejected twice by TDC under two separate administrations.

Having failed to gain TDC support for a CPO RiverOak decided to try under section 122-134 of the Planning Act 2008 and apply for a Development Consent Order which includes provision to grant Compulsory acquisition powers as part of the DCO.

RiverOak Investments Inc. pulled out of the process and a new company was incorporated by Tony Freudmann in 2016 called RiverOak Strategic Partners Ltd. This company has no trading history and no premises but exists purely as a vehicle to progress the DCO application.

To qualify for a DCO it is necessary to fulfil certain criteria. For an airport the applicant must show an intent to increase capacity by 10 million passengers or 10,000 air cargo movements. It was under this legislation that Manston claimed to be a Nationally Significant Infrastructure Project (NSIP). Manston has otherwise no claim to being Nationally Significant in any way.

Likewise RiverOak gave 10,000 air cargo movements as their target purely to meet the minimum needs of the DCO requirements. Throughout the DCO inquiry they failed to show where these flights would come from or who would operate them.

It must be remembered their intent throughout was to obtain ownership of the site either by compulsory purchase with TDC help or via compulsory acquisition through the DCO process.

As they have since purchased the land from Stonehill Park for £16.5 million just as the DCO inquiry ended, the need for a DCO is considerably diminished.

The business plan to develop a cargo hub at such a remote location at Manston was always weak with no realistic chance of success. The airport has never turned a profit at any time in its history.

RiverOak business plans can be compared to the American sports fantasy “Field of Dreams” “If you build it (they) will come”. Who and why is not addressed.

Sadly RiverOak’s dreams peddled by Tony Freudmann are equally flawed. Throughout the DCO inquiry they failed to convince the examiners and for that reason the examiners concluded the application should be refused.

Full details of their findings can be found in their final report.

MANSTON AIRPORT: TR020002

REPORT TO THE SECRETARY OF STATE FOR TRANSPORT: 18 OCTOBER 2019

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf>

Tony Freudmann is a fantasist and is happy to pursue those fantasies with the aid of other peoples money. Of the many companies he has been involved in few if any have proved viable.

RiverOak Strategic Partners (RSP) state on their website “RSP has committed to an investment of £300 million to rebuild Manston as a global freight hub”. They have never revealed where this money is, or where it is coming from.

Lawyers acting for RiverOak Strategic Partners (RSP) submitted a request to the Planning Inspectorate asking that the identity of investors not be put into the public domain during the on-going inquiry examining its case to take control of the site.

A search of the RiverOak group of companies show no sign of this money so it appears, to progress the project, approaches will have to be made to raise the funds on the open market.

RSP Quote- “As far as funding for the main project is concerned, in line with almost all projects this is not secured at present but will be if the DCO is granted, in this case through equity and debt financing.”

<https://theloadstar.com/planning-inspector-raises-doubts-over-whether-riveroak-has-adequate-funding-to-buy-manston-airport/>

Even with the £8.5 million donated by the Dept for Transport in compensation for the perceived delay to the project due to using the site as a lorry park there is a considerable shortfall. (On top of the £18.5 million paid to Stonehill Park).

Any investors will be hard to find with the current state of the aviation industry and any found will expect a reasonable return on their investment. A lack of financial backers is a serious impediment to the viability of the project.

In relation to air pollution, at the Public Inquiry RSP claimed the latest air quality controls predated the DCO application so they should not influence the application.

Tony Freudmann was interviewed on BBC Radio Kent and dismissed claims there was a government policy to change UK emission levels to 78% by 2035 and claimed they were "Aspirational" only.

(22 July 2021 10am Julie George BBC Radio Kent)

It may suit RSP to ignore the governments commitment to reduce emissions but it is hard to see how they can sidestep them when the government has committed to a reduction in emissions of 78% by 2035, based on the Committee's 2020 advice on the Sixth Carbon Budget.

Green MEP and air quality campaigner, Keith Taylor, has slammed RiverOak Strategic Partners' (RSP) consultation on plans to re-open Manston Airport over the firms 'astonishing ignorance' on air pollution.

In the Environmental Impact report, RSP claims:

- *There is 'scientific uncertainty about the health effects of NO2' emissions*
- *'NOx is not believed to have impacts on human health'*

Both claims are "at best, deliberately misleading, at worst, factually incorrect", according to Mr. Taylor, a member of the European Parliament's Environment and Public Health Committee.

Keith Taylor the Kent MEP said: "It is truly astonishing that a firm trying to demonstrate its ability to run an airport can be so wilfully ignorant of the facts on the UK's air pollution crisis."

On the firm's first claim, Keith says:

"Not only is the evidence for the negative health impacts of NO2 pollution clear, it is becoming stronger and stronger every day. In the UK, NO2 pollution alone is linked to the premature deaths of more than 20,000 people every year. Additionally, The World Health Organisation warns that NO2 'at the concentrations currently measured across Europe' is linked to both asthma in children and reduced lung function in adults."

On the firm's second claim, he adds:

"It takes an utter disregard for accuracy and/or a complete lack of scientific awareness to ignore the fact that NOx is a generic term covering various nitrogen oxide air pollutants including nitric oxide (NO) and nitrogen dioxide (NO2) -- which brings us back to RSP's first bogus claim."

Mr Taylor concludes:

"This consultation is filled with misleading and incorrect claims about the environmental and health impacts re-opening Manston Airport will have on the local communities, countryside and biodiversity."

"At best, RSP is incompetent and scientifically illiterate, at worst, it is wilfully trying to mask the true extent of damage of their environmentally-destructive plans. On these grounds alone, this pitiful excuse for an environmental impact report should be rejected out of hand."

"Ultimately, Manston Airport isn't, wasn't and never will be either economically nor environmentally viable, it's time for the prospective developers and Thanet District Council to finally be honest about that."

A further recent study has revealed more detail of the effects of air pollution beneath flight paths that are particularly relevant to Ramsgate on the approach to Manston.

Pre-Covid, researchers from Tufts University in Massachusetts, US, parked their mobile laboratory in the driveway of a house near Logan international airport in Boston. The colonial-style wood-frame house dated from the 1920s when the airport was a muddy military airfield. Located on a peninsular with no through roads, the area was quiet in traffic terms and air pollution was very low when the winds blew from the sea.

But pre-pandemic, the airport had more than 1,000 flights per day, many passing above the rooftop. When wind blew from the airport, 1.3km away, nitrogen dioxide was greater than that measured next to busy roads in the Boston area.

As the planes passed overhead the amount of ultra-fine particles, smaller than the wavelength of visible light, increased by nearly five times. Being indoors offered little protection; it only reduced concentrations by about 20%. Ultra-fine particles inside the house still were greater than concentrations measured close to busy roads.

Oddly, landing aircraft had a greater impact than those taking off. This may have been due to the low approach heights and vortices that form under aircraft wings swirling pollution to the ground. <https://pubs.acs.org/doi/10.1021/acs.est.0c01859>

The Climate Change Committee, the government's official advisory body has proposed a cap on passenger numbers to meet Boris Johnson's decision to set the UK on the path to net zero emissions by 2050. The government must decide whether to incorporate this into law, or to explain why it is rejecting the advise. (*The Sunday Times 14th February 2021*)

Action to improve the nation's resilience is failing to keep pace with the impacts of a warming planet and increasing climate risks facing the UK. *That* is the conclusion of a comprehensive independent assessment led by the Climate Change Committee (CCC) which considered a catalogue of risks and opportunities affecting every aspect of life in the UK. (CCC 16th June 2021)

Since the DCO inquiry the Government has raised their commitment to air quality control and reducing emissions to also include international aviation. It is inconceivable that the government would approve the development of a cargo hub at Manston without giving due consideration to the adverse climate impact.

The Sixth Carbon Budget – Aviation; states that the UK set its Sixth Carbon Budget (i.e. the legal limit for UK net emissions of greenhouse gases over the years 2033-37) to require a reduction in UK emissions of 78% by 2035 relative to 1990, a 63% reduction from 2019. This will be a world-leading commitment, placing the UK decisively on the path to Net Zero by 2050 at the latest, with a trajectory that is consistent with the Paris Agreement. Freight flights are included within DfT trajectories, so are implicitly assumed to scale with CCC passenger profiles. <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Aviation.pdf>

A report published in May 2021 by the New Economics Foundation “Turbulence Expected - The Climate Cost of Airport Expansion” They compare a number of UK airports including NSIP's They recommend;

- *The Secretary of State should call in all of the currently active airport planning applications and assemble a more robust and precautionary evidence base on climate change issues. This evidence can be measured against the forthcoming aviation decarbonisation strategy and the government's new 2035 emissions target, which is expected to include international aviation emissions. In addition, the government will need to demonstrate how the proposed expansions can be reconciled with the Climate Change Committee's recommendation of a no net-expansion policy on airports.*
- *The Department for Transport (DfT) should ensure a more robust evidence base is assembled for the appraisal of future airport expansions, including in the case of future NSI proposals, all of which are expected to involve significant climate impacts. This should include tighter guidelines and expectations on the integration of non-CO2 climate impacts, and the monetisation of said impacts.*

<https://neweconomics.org/2021/05/turbulence-expected>

Additionally, I would refer to the lack of progress RSP are having in obtaining an airport licence, currently lodged with the Civil Aviation Authority. In order for Manston airport to become operational, RiverOak will require a number of separate approvals from the CAA, including those for aerodrome and air traffic management safety and airspace change. These processes will

include noise pollution and are at an early stage and at present only the airspace change process has been formally initiated.

“Following advice from the CAA, RSP will re-evaluate the supporting documentation with a view to submitting the documents to the CAA for a further Stage 2 Gateway Assessment in the near future and progressing the ACP to the next stage which will involve a full public consultation.”

The CAA has previously made a direct response to the SoS for Transport re this matter. <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005291-Civil%20Aviation%20Authority.pdf>

The examining authority - PINS - recommended that the DCO not be granted. The four inspectors, who held a public inquiry last year, consider that the levels of freight that the airport would be expected to handle to be “modest” and could be accommodated by existing airports, such as Heathrow, Stansted and East Midlands Airport (EMA).

They considered that the “development appears to offer no obvious advantages to outweigh the strong competition that such airports offer. The ExA has therefore concluded that the applicant has failed to demonstrate sufficient need for the development, additional too (or different from) the need which is met by the provision of existing airports.”

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf>

<https://www.thanet.gov.uk/wp-content/uploads/2020/04/Thanet-Local-Plan-Report-Final-22.03.20-1.pdf>

In 2016 Thanet District Council commissioned a report from Avia Solutions into the viability of Manston. The report entitled “Commercial Viability of Manston Airport” they concluded it was not viable. Nothing has changed, if anything circumstances have got worse;

8.1. Introduction

In this chapter we draw together the conclusions of our research and analysis to form our conclusions, specifically to opine on whether there is a realistic prospect of a financially viable airport operating on the Manston Site.

8.2. Summary

It is AviaSolutions view that having considered the stakeholder interviews and independent research and analysis into historic accounts and ‘reasonable’ adjustments for one-off costs that there is little prospect of a financially viable airport on the site.

The only circumstances in which we believe the airport may be viable is that in which no new runway were developed in the South East of England. However, this scenario presents extreme risk to the investor, as a decision to increase runway capacity at those

not physically constrained (e.g. legally constrained LHR and STN) could be made at any time, or a new runway may be authorised at any time in the future.

8.3. Stakeholder Interviews

Our stakeholder interviews were split between those focused upon passenger development and those focused upon freight development. The range of interviews provided an understanding from the industry as to their position on the airport.

Our passenger service interviews suggested that overall there is little interest in serving the airport, in particular from airlines that had previously served the airport such as Flybe. There was some limited interest from airlines such as Ryanair and KLM, who would consider the airport as part of their standard UK market review, however they were not actively seeking to serve the airport. It is our view that we must consider this in light of its context; for an airline that bears no risk in an airport's reinstatement and for whom its reinstatement may present upside risk, it would be illogical to rule out the possibility of serving it. Overall, our interviews suggested there was very limited interest in the airport for passenger services thus suggesting a long term viable passenger service may be difficult to sustain.

Our freight interviews indicated that the demand to use the airport for freight was very limited. This, in large parts, is due to two factors; the infrastructure investments that have already been made by the industry around Heathrow and Stansted, and the geographical location of the airport. Infrastructure, and the associated knowledge, skill and supporting industry at airports such as Heathrow and Stansted, as well as the major European hubs such as Frankfurt, and Paris, would be almost impossible for Manston to replicate. The geographic location of the airport, tucked into the corner of the UK, cannot compete with airports such as East Midlands for Integrator services that are sold as fast delivery, due to the increases in surface transportation times. The interviews did however indicate that charter services and ad-hoc freighter flights would certainly return, providing some revenue income for the airport. In summary, we conclude that freight would return to the airport in limited quantities, not dissimilar to the tonnage previously processed at the airport.

8.4. Simulations

AviaSolutions' models provided simulations of the financial performance of an airport on the site under different demand scenarios. These scenarios were developed with a positive view of the potential demand profile, unit revenue and unit cost and investment costs. Two simulations (LHR3 and LGW3) suggested that the airport was unlikely to generate profits at an operational level (EBITDA) until circa FY2025, and that these profits would remain muted through until FY2040. The EBITDA profile suggests that, based on recent industry exit multiples, it would not be possible to recover the initial equity through a sales process at this point. Furthermore, these scenarios suggest that retained earnings would not turn positive for 15 to 20 years, thus limiting the ability of an investor to recover their costs of equity. In summation, these scenarios present very large risks with small returns over a long time horizon.

https://www.thanet.gov.uk/wp-content/uploads/2018/03/Final-Report-for-TDC-Manston-Airport-Viability-2016_2.pdf

While the airport site has no national significance, any decision will have a major impact on the future of Thanet and East Kent. Its future has rumbled on for many years and recently necessitated the intervention of the SoS for Housing to force through an updated local plan, the first since 2006. Matters were not helped by the continual change of leadership in the council over recent years. Manston airport has been one of the main sticking points throughout.

The newly adopted Local Plan still leaves open the future of Manston Airport, as the decision of the SoS for Transport and the re-determination of the DCO is awaited. The main objective of the Local Plan remains the same - to meet the housing and other needs of local people, to protect the environment for the long term, and to address the impact of climate change. To that end the council has declared a Climate Emergency, and the Plan recognises the impact of climate change on all of us. The adoption of this Plan marks a significant step forward in that endeavour.

<https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-Local-Plan-July-2020-1-1.pdf>

The rapid spread of Covid around the world highlighted how the aviation industry was a major contributor to the spread of the pandemic. The world has changed, and people are now realising the impact of jumping on an airplane for none essential travel. it is now necessary for Government to reflect that concern by ensuring the climate change emergency is adequately addressed.

Lockdown measures have led to a record decrease in UK emissions in 2020. (down 48% below 1990 levels) Emissions fell by around 13% overall **with the largest falls in aviation (-60%)**, shipping (-24%) and surface transport (-18%).

However, the fall in emissions in 2020 will have practically zero impact on the UK's past and future contribution to global warming. (*Climate Change Committee June 2021 'Progress in reducing emissions' 2021 Report*)

The Climate Change Committee state; The approaching COP26 Conference (Nov 2021 Glasgow) demands a step change in Government action, but it is hard to discern any comprehensive strategy in the climate plans we have seen in the last 12 months. There are gaps and ambiguities. Climate resilience remains a second-order issue, if it is considered at all. We continue to blunder into high-carbon choices. Our Planning system and other fundamental structures have not been recast to meet our legal and international climate commitments.

Lack of ambition for aviation demand management would result in higher emissions of 6.4 MtCO₂e/year in 2030 relative to the CCC pathway for aviation emissions. In light of the UK's new Net Zero target, the Government has committed to a new consultation on aviation decarbonisation in 2021, followed by a Net Zero aviation strategy before COP26.

A commitment to include international aviation and shipping emissions within the Sixth Carbon Budget has now been made by the Government.

Two years ago, the UK was aiming to reduce emissions to at least 80% below 1990 levels, by 2050. (from 48% below 1990 levels in 2020). As of 2019, the emissions reduction goal for 2050 is now at least 100% ('Net Zero') and the Government has committed to a reduction in emissions of 78% by 2035, based on the Committee's 2020 advice on the Sixth Carbon Budget.

The UK already has more than enough capacity to accommodate the demand increases in our Balanced Net Zero Pathway. Our advice in the Sixth Carbon Budget was therefore that there should be no net expansion of UK airport capacity, unless the sector is on track to sufficiently outperform its net emissions trajectory and can accommodate the additional demand:

- *Outperforming the net emissions trajectory means making significant progress on nascent and untested technologies like hybrid electric planes, and developing and scaling up markets for sustainable aviation fuels (SAF) and greenhouse gas removals.*
- *It is not possible to have certainty today over the pace of development of these technologies in future. It is therefore difficult at present to justify capacity expansion on the basis of outperforming the emissions trajectory, particularly given the uncertainty around the permanence of impacts on aviation demand from COVID-19.*

The Department for Transport (DfT) has yet to set out any plans for limiting growth in aviation demand. No recognition that demand needs to be managed and several policies (e.g. proposed Air Passenger Duty reductions and airport expansion) are encouraging growth in the sector. Passenger- kilometres travelled per person have been increasing (pre-COVID-19) faster than can be accommodated in the CCC pathway.

*CCC Recommendations require the DfT to; Assess the Government's airport capacity strategy in the context of Net Zero and any lasting impacts on demand from COVID-19, as part of the aviation strategy. **There should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory and can accommodate the additional demand.** A demand management framework will need to be developed (by 2022) and be in place by the mid-2020s to annually assess and, if required, control sector GHG emissions and non-CO2 effects.*

It is clear the government is committed to reducing emissions. It would be hard for any minister to go against that commitment and approve the DCO application for an airport that is not needed and in such a remote location as Manston.

Whatever the decision taken, it is hoped the government do not repeat the Seabourne ferry fiasco inflicted on Ramsgate when Chris Grayling awarded a contract to a ferry company with no ferries and a website plagiarised from a takeaway restaurant.

It was Chris Grayling who originally accepted the Manston DCO even though questions were raised by the Planning Inspectorate about the validity of the application requiring a second submission.

The Shadow Transport Secretary Mr McDonald said there were “clearly major doubts” as to whether the proposal constituted a Nationally Strategic Infrastructure Project, which is a requirement for a DCO.

For the above reasons I oppose the granting of this DCO application.

Submitted by email prior to the 9th July 2021 deadline

By James Hose

