

CONSULTATION ON THE INDEPENDENT AVIATION ASSESSOR'S DRAFT REPORT AND THE REPRESENTATIONS RECEIVED ON THE STATEMENT OF MATTERS

Response by James Hose local Ramsgate resident.

Submitted prior to the 19th November deadline.

This submission follows numerous other submissions I have made throughout the examination of the application by RiverOak Strategic Partners for a Development Consent Order in regard to Manston Airport.

“Here we go round the mulberry bush” is a children’s rhyme that relies on repetition. “Once more into the breach” is a quote from Shakespeare allegedly spoken by Henry V as he led his men into battle once more. Groundhog Day is also a term to denote repetition. The definition of insanity is doing the same thing over and over and expecting a different result.

It may not be the DfT going insane but the residents of Thanet are going demented and growing tired of repeatedly being asked to submit answers to the same question. No matter how many times the question is asked the facts do not change.

Manston Airport never was of National Significance. It isn’t now Nationally Significant and it is not likely to be Nationally Significant in the future. Why it was ever accepted as a Nationally Significant Infrastructure Project (NSIP) under the terms of The Planning Act 2008 remains a mystery. Few people west of Maidstone have even heard of Manston.

May 2018: The DCO application was withdrawn to satisfy PINS’ requests for further information about certain parts of the application. **These related to funding and to the categorisation of the project as being of national significance**, and to certain aspects of the supporting environmental statements, before being resubmitted in July 2018. [REDACTED]

Of late (March 2020) responses from the media and even airport expansion and environmental campaigners has been muted. In a list of 21 airport expansion schemes around the UK highlighted by Extinction Rebellion’s call-to-action on Twitter, [REDACTED], the plans to develop Manston were completely ignored and not included in the list. Nor was it featured in [REDACTED]

In his letter dated 11 June 2021 The SoS for Transport's response To the Judicial Review focuses on questions of need for the development at Manston; and the instructions to the independent aviation assessor also focuses on that need.

Manston Airport closed in 2014 for good reason. The results are now in. It is not viable, It is geographically isolated, and it is not needed. It was not needed by the RAF post war. It was not needed by the USAF post cold war.

In 2005 a Mori pole of Thanet residents showed 74% had never used the airport. This was at a time EUJet was offering cheap flights to 16 holiday destinations. [REDACTED]

It was declared not needed by the Examining Authority following an exhaustive Public Inquiry. It has now been found not needed by the Department for Transport's own aviation expert Ove Arup & Partners Ltd. Numerous other reports have reached the same conclusion.
(See Appendix A)

All attempts to run it commercially have failed. The Wiggins Group / Planestation tried and failed. Infratil tried and failed. Both companies promoted freight which failed to materialise. Planestation, with Tony Freudmann as Vice President went into administration.

Tony Freudmann has a long history of failure in other airport projects. Infratil off-loaded the airport for £1 to Ann Gloag following heavy losses. Ann Gloag quickly saw the airport was haemorrhaging money and closed it down.

The Arup report has not gone down well in some quarters they, RiverOak responded "it is clear that it is an amateur and poorly constructed report". While SMAa backed up that claim by using the same phrase "amateur and poorly constructed." Sir Roger Gale MP for RiverOak stated "I regard the draft "Manston Airport Assessors Report" as deeply flawed". All have chosen to offer scathing attacks on the report rather than present counter arguments.

During the course of the Public Inquiry RSP refused to disclose where the alleged £300 million was coming from. 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."

When the Examiners questioned Sally Dixon (Azimuth report) It was clear that RSP did not have a viable business plan. Further, Freudmann has

recently claimed it is not necessary to prove need. “There is no general obligation to establish need for a nationally significant infrastructure project. The London Resort project, for example, as a leisure facility is not ‘needed’ per se”. Once more he falls back to the expectation ‘If we build it they will come’. Repeatedly RSP fail to identify any aviation company with an interest in using Manston.

Currently the application for an airport licence with the CAA has stalled. *(The CAA has completed the Develop and Assess Gateway Assessment and is not satisfied that the change sponsor has met the requirements of the Process up to this point. The CAA does not approve progress to the next Step. Further explanation for this decision is contained in the statement "Develop & Assess Gateway Outcome - 30 July 2021".)*

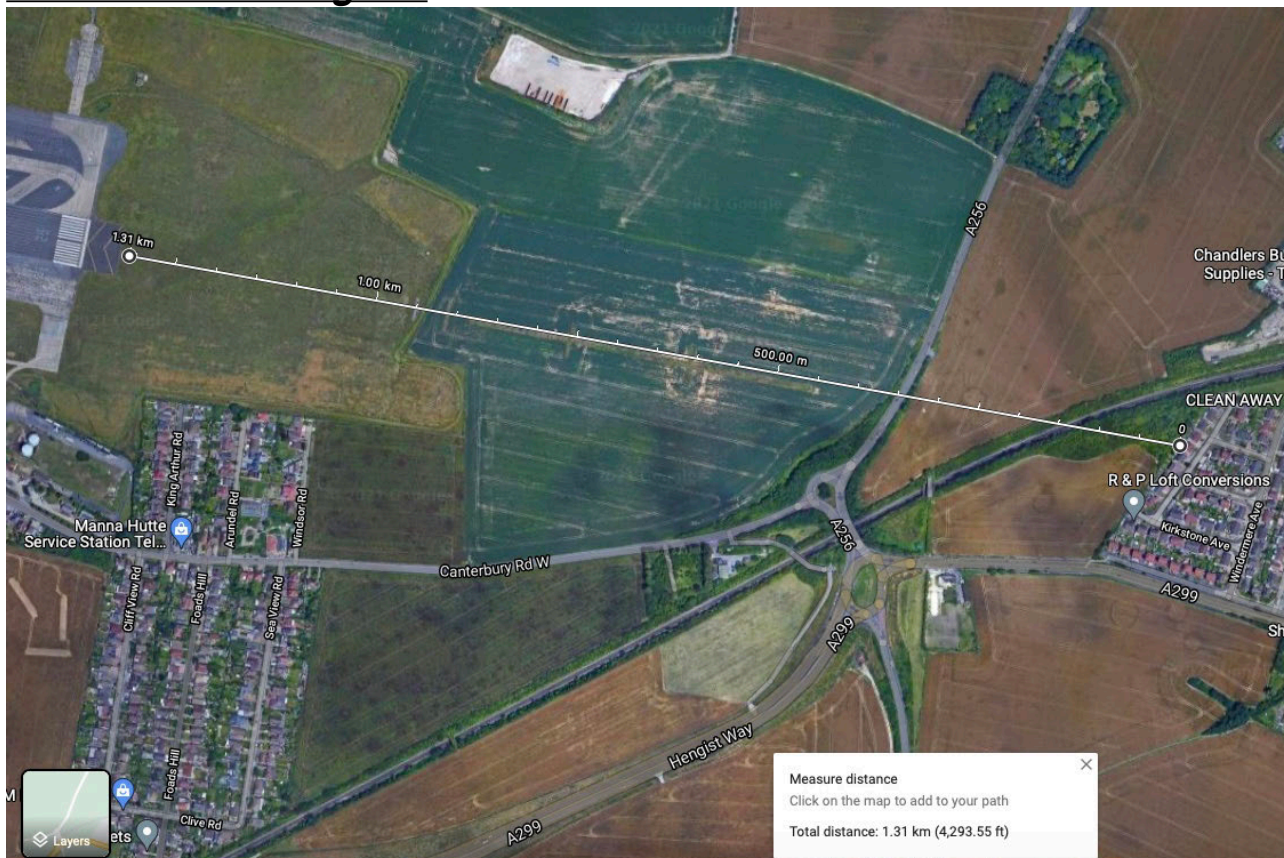
The DCO has been quashed by the High Court following the Judicial review by Jenny Dawes. Why have RiverOak not appointed their own aviation expert to argue their case? Having been awarded £8.5 Million by the Department for Transport for an alleged delay they should have the funds. Surely there must be some aviation expert available, for a fee, to put their name to such a document and back Sally Dixon’s Azimuth report. Without such a document the SoS must instead rely on the numerous reports by experts that point to Manston not being viable. (See appendix A)

With the quashing of the DCO it is difficult to see what will replace it. The DCO document has been removed from the Planning Inspectorates webpage as has the SoS’s decision letter. Will it be reinstated unaltered or will changes be made? We are clearly heading into uncharted waters. Now that RiverOak own the airport the DCO is no longer needed. At source it was the power of acquisition they sort. Other airports submit planning applications through their local councils.

Whether Thanet District Council are fit for that purpose remains to be seen. With a recent damning Auditors Report <https://www.thanet.gov.uk/wp-content/uploads/2021/10/Thanet-District-Council-statutory-recommendations-12-October-2021.pdf> and a call by council leader Ash Ashbee to Local Government Secretary Michael Gove to scrutinise council governance they are not in a good position. The Department for Levelling Up, Housing and Communities (DLUHC) said: "We are aware of the concerns raised about Thanet Council's governance and will remain in close contact with the council."

The Arup report states again what the PI Examiners concluded; that Manston is not needed. I concur with those findings. I would disagree with only one point. The Arup Report repeats a claim made by RiverOak that the airport is 4 kilometres from Ramsgate.

“The Application Site is 296 hectares (732 acres) located entirely within the administrative area of Thanet District Council. It is 5km south of Margate and 4km west of Ramsgate”.



It depends from where the measurement is taken. The distance between the end of the runway and the first houses in Ramsgate, directly on the flight path is only 1.33km. The airport boundary is closer and the landing lights even closer. See illustration above.

It is disappointing that both our local MP's continue to give strong support to RiverOak and refuse to engage with local residents who hold counter views. Even in these sensitive times (3rd November 2021) while the DCO process is still active Sir Roger Gale is submitting parliamentary written questions direct to the SoS for Transport on air cargo figures. Local residents would not have that level of access. (See Appendix B) Sir Roger was recently suspended by the Committee of Standards of the House of Commons for trying to influence the outcome of a trial of a fellow MP. ([REDACTED])

One wonders why, despite strong arguments and detailed evidence, our MP's cling to a company that has no trading history and no office premises other than a company file lying in a solicitors office. It is noted one of their directors (Niall Lawlor) has resigned (27th September 2021) and returned to America.

Craig Mackinlay South Thanet MP was first elected in 2015 aided by the Conservative Party over spending the amount allowed by the Electoral Commission. This resulted in him being required to appear at Southwark Crown Court to face charges of falsifying expenses. While a senior Party official was convicted in the trial, Craig Mackinlay was subsequently acquitted.

It perhaps illustrates a trend this Government has in manipulating rules to suit their own agenda. How, in 2016, the Prime Minister called to prorogue parliament. How Matt Hancock awarded Covid contracts to friends and party supporters. The £107 million contract awarded to Seabourne Freight by Chris Grayling. Robert Jenrick's approval of an Isle of Dogs development to satisfy a party donor. David Cameron's Greensill lobbying scandal and now the Owen Patterson debacle. A system based on cronyism, nepotism, gerrymandering and sleaze.

The Manston Airport DCO is developing in similar questionable fashion with the Secretary of State for Transport going against the Public Inquiry findings and the Examiners recommendations. Attaching Andrew Stephenson's (the MP for Pendle) signature to the decision letter. The way the time scale has been allowed to slide with numerous deadlines pushed back is both frustrating and unsettling for local residents as they await a final verdict so they can plan their futures accordingly.

The future of the Manston brownfield site has gone on for far too long.

Should the SoS for Transport again go against those findings and grant the DCO despite overwhelming evidence against there will certainly be strong local support behind a further Judicial Review challenge.

Submitted by 19th November Deadline

James Hose

Ramsgate Resident

There have been numerous reports that point out the failings and give clear evidence why.

Appendix A

2010 BICKERDIKE ALLEN PARTNERS report night noise assessment

<https://democracy.thanet.gov.uk/documents/s9076/A9293%20R01-AH%20Manston%20Night%20Noise%20INM%20Assumptions%20-%20Annex%202.pdf>

2011 YORK AVIATION Economic impact of night flying policy

2011 BICKERDIKE ALLEN PARTNERS noise

<https://democracy.thanet.gov.uk/documents/s11743/Manston%20Airport%20Night%20Noise%20Report%20Presentation%20Thanet%2020-01-2011.pdf>

2014 FALCON report EXPERT OPINION ON THE PROSPECTS FOR THE VIABLE DEVELOPMENT OF MANSTON AIRPORT

2015 Davies Airports Commission rejects Manston as regional hub airport.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/858533/airports-nps-new-runway-capacity-and-infrastructure-at-airports-in-the-south-east-of-england-web-version.pdf

2015 KCC position statement on Manston Airport

https://www.kent.gov.uk/data/assets/pdf_file/0003/29541/Manston-Airport-position-statement.pdf

2016 TDC final report for Thanet District Council (TDC) Manston Airport Viability

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

2016 AVIA SOLUTIONS Riveroak response TDC Manston Airport viability final

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

2017 AVIA SOLUTIONS local plan representations review final

<https://www.thanet.gov.uk/wp-content/uploads/2018/03/AviaSolutions-Local-Plan-Representations-Review-2017a.pdf>

2017 AVIA SOLUTIONS analysis of report by Azimuth/Northwood on Manston

<https://www.thanet.gov.uk/wp-content/uploads/2018/03/AviaSolutions-Analysis-of-Manston-Airport-Report-by-Azimuth-Northpoint-2017a.pdf>

2017 YORK AVIATION for SHP summery report final

<https://www.thanet.gov.uk/wp-content/uploads/2019/03/Matter-10-GVA.StoneHill.pdf>

2018 ALTITUDE AVIATION report

2019 ALTITUDE AVIATION report update


https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004853-AS_Five10Twelve_York_Altitude.pdf

2019 DCO Examiners recommending refusal of DCO on many issues including need

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

2021 YORK AVIATION for Jenny Dawes in redetermination of DCO

2021 ALAN STRATFORD ASSOCIATES for Ramsgate town council



2021 OVE ARUP for DfT/SoS

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005842-Manston%20DRAFT%20Assessors%20Report%20-%20Publicationv1.pdf>

Appendix B

Questions by Sir Roger Gale to SoS for Transport

To ask the Secretary of State for Transport, what assessment his Department has made of UK airfreight infrastructure required to accommodate (a) dedicated freighter aircraft using UK runway capacity, (b) belly freight on passenger aircraft served by existing UK airports and (c) airfreight trucked to or from EU airports.

To ask the Secretary of State for Transport, what estimate his Department has made of the air freight capacity available at (a) Heathrow (b) Stansted and (c) East Midlands airports.

To ask the Secretary of State for Transport, what estimate he has made of the annual tonnage of air freight that is (a) trucked from the UK to EU airports for onward carriage by air and (b) flown into EU airports and then trucked onwards into the UK.

To ask the Secretary of State for Transport, what modelling his Department has made of levels of future air freight volumes to and from the UK up to 2050.

To ask the Secretary of State for Transport, what assessment his Department has made of the impact of internet sales on demand for air freight services.

To ask the Secretary of State for Transport, what assessment his Department has made of the impact of new trade deals on the import and export volumes that will require air freight transportation.

To ask the Secretary of State for Transport, what assessment his Department has made of the impact of future GDP growth on air freight tonnage for (a) imports into and (b) exports from the UK.