

To the Secretary of State for Transport Grant Shapps

Dear Sir

We took part in the DCO process expecting to be treated fairly. We were handicapped both financially and in terms of expertise yet still we put our case forward & expected fairness & justice to prevail. It seems we were wrong. We are therefore very angry that Andrew Stephenson decided to pass it despite the examiners recommendations on so many issues to refuse. When this came to a judicial review he was unable to justify his position and conceded on the grounds "the Secretary of State did not give adequate reasons in his decision letter to enable the reader to understand why he disagreed with the Examining Authority Report on the issue of need for the development of Manston Airport". It seems even after a year the SoS could not come up with any evidence to justify his position probably because there isn't any. Are we to take part in this re-determination and provide evidence again that Manston wasn't, isn't and will never be viable for the SoS just to ignore it again and pass the DCO with absolutely no evidence to support his position? Given the spate of poor DCO decisions we suspect public confidence in the government to do the right thing is low

We took part in a process that was obviously biased in favour of the applicant. We have had no help from our two Thanet MPs who seem to have their own agenda & in Craig MacKinlay's case a business relationship with Tony Freudmann when he was CEO at Manston. We have to say we feel Roger Gales continual lobbying for a private company to the exclusion of constituents concerns and who are very worried about the impact of a 24/7 cargo hub on their doorstep extremely inappropriate for an MP. Especially given the recent Greensill scandal and RSP are a company based in the British Virgin Isle. There seems to be no due diligence as to where monies are coming from with RSP funds funnelled through Antony & Eleanor Freudmann's company Freudmann Tipple.

We have to wonder why the onus is on us to provide evidence now when we have already done so several times, doesn't the SoS/DfT do any research? We had four very experienced planning inspectors conduct a long examination into RSP's application where more people took part than any other DCO enquiry with the majority opposing the application. We looked at the submissions from people in favour. Many were from people who never lived in the area and many consisted of "it's always been an airport" and "we don't want houses". Hardy compelling evidence of need? The examiners overwhelming recommendation was to refuse the DCO on many issues. We should not have to point out to the DfT the dire financial straits that aviation is in. Who in their right mind would invest in such a project especially overseen by Mr Freudmann? This is a man who has never run a successful business in his life and has in fact been struck off as a solicitor for misappropriating client funds, at an airport that has failed three times and lost owners, investors, Thanet District Council & Kent County Council millions of pounds. We note Mr Freudmann seems to have availed himself of Google's "right to be forgotten". It seems RSP won't be risking their own money as Mr Freudmann is on record as saying RSP will be looking at finding other investors to carry the project forward financially. The company that has applied for the DCO is a different one to the one that owns it so it will be these investors that will lose their money while the other RSP company will retain ownership of the land. The percentage of pure cargo freight RSP are claiming Manston will handle in their DCO application is fantasy given that it represents 28.5% of the DfT's cargo forecast UK total pre-covid (17,100 ATMs out of 60,000). If you were to draw a circle around other airports catchment area and then draw that round Manston 75% would be sea.

Mr Freudmann is very good with coming out with spin. He says that pure air freight has increased since covid. While this is true in the short term once passenger flights return & bellyhold is available

again these will decrease as bellyhold is cheaper as it is subsidised by passenger tickets. It is worth pointing out that overall cargo tonnage actually decreased by 21% overall last year (CAA statistics) and trade with Europe by 40% since Brexit but the DfT should know that. He says Manston failed due to poor management but fails to say he was in charge during one of the many failures. He says Manston will be a "green" but fails to point out that this does not include planes that will use it or lorries and aviation tankers (there is no fuel pipeline to Manston like at other airports) needed to service it. There is no mention of this in the DCO anyway or commitment in the DCO for Manston to be carbon neutral so they obviously can't be held to it legally. He comes out with gems like hydrogen fuelled & electric planes that will reduce pollution and noise. The truth is this technology is decades away for the sort of use he is talking about. There is also his statement regarding electric barges taking cargo from Manston via Ramsgate port, apart from the fact that no such service exists, who in their right mind would fly into Manston and then muck about loading and unloading goods when they can simply fly for a few more minutes to an airport that has better transport links. Why would you want to just take them further up the Thames Estuary just to load them on lorries to complete their journey anyway?

*** Update apparently the fantasy barges are now to be hydrogen powered***

RSP have planted a few trees in Thanet & seem to think this will offset the CO2 emissions from Manston when the truth is millions of trees would have to be planted every year to offset the sort of operation RSP are proposing. RSP are trying to sell this airport on technology that doesn't exist or is decades away and a commitment to be carbon neutral that is not in the DCO so isn't legally binding. The DCO should be decided on what is feasible & available now.

Mr Freudmann makes statements in which he mentions airlines like KLM & Ryanair. These are designed to give the impression that they will be using Manston. Firstly it is going to be a cargo hub with passenger flights possibly later on. Secondly not one of these companies has shown any interest in using Manston. In fact when KLM left Manston when it shut they were on record as saying they wouldn't be returning. When contacted Ryanair say they have no plans to use Manston. In spite of Mr Freudmann's spin no airline, cargo or passenger, has made any commitment to use Manston or has shown any interest. There has been a conspicuous lack of publicised support for the proposed development from cargo & passenger airlines or air freight logistics specialists at any time before or after the DCO decision was quashed. We are sure if there had been any support at all forthcoming Mr Freudmann wouldn't have wasted the opportunity to capitalise on it with public statements.

RSP are also saying the local plan reserves Manston for aviation only, this isn't true and just more spin. Thanet District councillors could not find any evidence to support that position. Because of this they went against officer's advice and reserved it for aviation just until the DCO was resolved. At that point the local plan will have to be reviewed and if the DCO has failed the land will be reallocated.

There has not been one aviation expert apart from Sally Dixon who has said Manston is viable. When questioned by the DCO examiners she couldn't say whether RSP's business plan was viable. It shut over 7 years ago now. There have been four detailed reports since from aviation experts, Falcon Consultancy, Avia Solutions, Altitude Aviations and York Aviations, all showing that Manston Airport is unviable and unnecessary. These along with fact that it has already failed three times should tell the SoS & DfT all they need to know.

We have contributed to an independent report commissioned by Jenny Dawes. We also understand that Ramsgate Town Council are taking independent advice from an aviation expert which we suspect will echo every preceding experts opinion so we will not go into any great detail here regarding the Manston's viability as it has already been said

We would, however, like to point out

1. The ANPS has been ratified by Parliament & has survived several legal challenges so it looks like Heathrow runway three will go ahead, though there may well be a delay due the effects of covid on passenger numbers. R3 will give Heathrow over a 50% increase in capacity.
2. East Midlands Airport is increasing capacity and has been granted Freeport status by Rishi Sunak. Because of this there will be a lot of investment in infrastructure, manufacturing & warehousing around the airport.
3. This year Stansted Airport won its planning appeal and is also increasing capacity.
4. Gatwick Airport's commitment not to use the second runway (used for taxing now) has ended. If this is bought into play for short haul flights as seems likely, this will increase capacity there dramatically by 55,000 flights.

All these airports are up & running with a proven track records and better transport links than Manston will ever have. All Manston has is a dual carriageway in & out leading to a two lane motorway that often gets snarled up with long delays around the M25 junction at the Dartford Crossing.. With the current situation in aviation due to covid all UK airports will be struggling for many years and will need to retain and increase their market share to survive. They will obviously fight tooth & nail to prevent Manston taking any of that market.

At the recent G7 meeting countries have made long-term targets to reach net zero emissions by 2050, and nearly all have targets to cut carbon in the next decade. The UK has led with a goal of cutting emissions by 68% by 2030 and 78% by 2035, based on 1990 levels. The Sixth Carbon Budget will be enshrined in UK legislation and targets for carbon emissions from UK international aviation will be included from 2033 onwards. Thanet Council have declared a climate emergency and Kent County Council are saying they are going to miss their CO2 targets. Reopening Manston would have a big impact on both of these. The irony is a DCO for something that could have helped locally with reducing greenhouse gas emissions, an extension to the Vattenfall wind farm, was refused. If the government really are serious about climate change they need to start showing it. Refusing this DCO for an airport that simply isn't needed and been shown to be not needed would be an easy start.

The mainstay of RSP's application is that it would create jobs. When it shut Manston employed less than 150 people mostly on part time zero hour contracts. Since Manston shut employment in Thanet has increased. RSP has never actually quantified or qualified what jobs will be available at Manston, they just conjure up notional figures using obscure "multipliers". Mr Freudmann is also on record now as saying that fewer jobs will be available due to automation. As according to RSP it was always meant to be "state of the art" you have to wonder why he has only just come to that conclusion.

The Tourism Economic Impact Study shows that, before the devastating impact of the COVID-19 pandemic, Thanet's visitor economy was valued at £352 million, after welcoming 4.6 million visitors in 2019. Independent research commissioned by Kent's official Destination Management Organisation has revealed that £25 million was spent on average in the local economy each month in 2019, as a direct result of the region's tourism and hospitality industry. The number of tourism jobs across the district showed a 9% increase between 2017 and 2019, to 8,664, accounting for 20% of Thanet's total employment last year. These are government figures. This is a sustainable industry that would dramatically be hit by noisy polluting low flying planes from Manston. This would hit the many small businesses in Ramsgate who rely on tourism; nobody in their right mind would want to visit the area. Tourism to the area is more likely to bounce back quickly from the covid pandemic than aviation and employs more people than a cargo hub at Manston would.

We also noticed that the DCO as passed by the SoS removed any safeguards for residents regarding "late" flights or as we would call them night flights. There was very little protection anyway given that RSP seemed to be the ones who got to decide what exactly constituted a late flight. We wanted to check on the exact wording but it seems the SoS's decision letter along with any reference to it has been removed from the planning inspectorate's web site. The truth is if there hadn't been an airport at Manston in the past no sane person would be suggesting one so close to a town. The DCO is meant to be a balance of public need versus the impact on individuals. No other town would be so close to an airport as Ramsgate should Manston reopen. When you are talking about destroying the health wellbeing & lives of a town of 40,000 plus people with noise & pollution from an airport that has been evidenced to show is totally unnecessary the scales must fall on the side of refusal of the DCO. We just hope the SoS will take note of the evidence this time round and reject the application as he should.

Hilary Scott reg; 20014097

Ian Scott reg; 20013013

Ian Scott reg number : 20013013

To the Secretary of State for Transport

KEY

RSP = Riveroak Strategic Partners

DCO = Development Consent Order

SMAa = Save Manston Airport Association

RTC = Ramsgate Town Council

TDC = Thanet District Council

CILT = Chartered Institute of Logistics & Transport

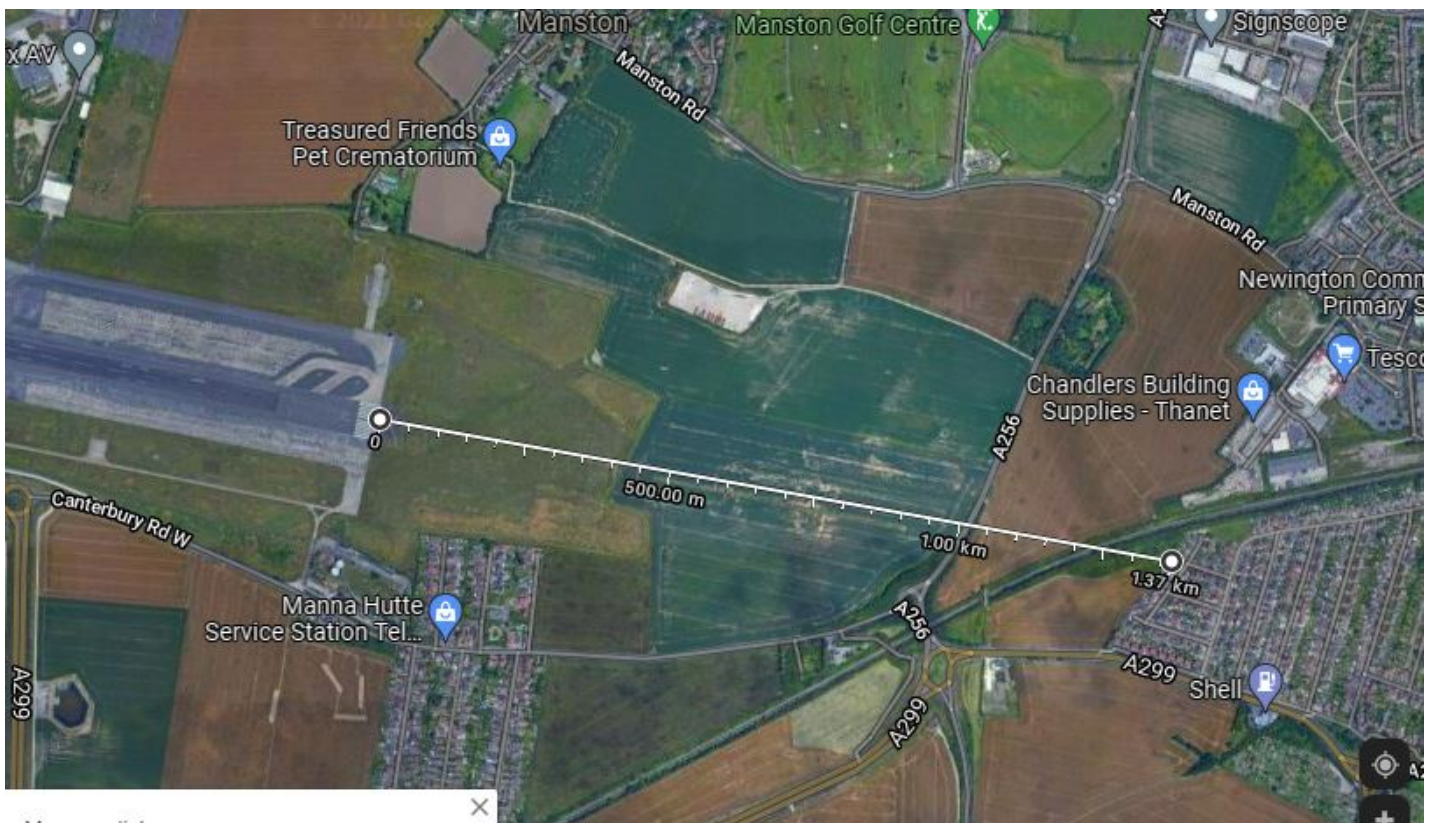
ATMs = Air Traffic Movements

HRDF = High Resolution Direction Finder

I am writing to express my continuing opposition to Riveroak Strategic Partner's plans to reopen Manston airport as a freight hub.

We live on Nethercourt estate which starts 1.37km from the Runways end. We have seen RSP quote Ramsgate being 4km away, this is incorrect but seems to have been accepted as fact.

This is from Google maps



Planes will fly less than 500ft over Nethercourt estate. When the airport was open experience has shown the noise means you cannot hold a conversation, listen to the TV, or make a phone call. There is a smell of unburnt aviation fuel in the air which you can taste. It also covers plants, trees, ponds, fruit & vegetables grown in local allotments and anything left outside with an oily film. Plants & trees in gardens have flourished since the airport shut.

NEED VERUS BENEFITS

It seems the Ove Arup report on need at Manston comes to the same conclusion as every other aviation experts have done. There have been 16 reports from aviation experts saying Manston isn't viable and simply not needed. Other airports can cope with any increase in demand. It was good to see that Ove Arup saw though RSP's efforts to manipulate figures to support their application. They did this during the DCO examination period quoting ATMs from Manston but having planes only partial loaded compared to tonnage usually carried. This was done to bring ATM's up to a level that would be required for a DCO. RSP are trying to turn their baseless assumptions into facts that are just not there as evidence for need. We now note that RSP are saying they don't have to prove need. We always understood this to be the mainstay of any DCO application. If RSP's DCO application succeeds given all the evidence against it will bring the whole DCO process into disrepute as it will mean anyone can come along with a scheme no matter how implausible and be able to compulsory purchase people's homes and land.

Somewhere along the line it seems to have been forgotten that a DCO has to be of **NATIONAL STRATEGIC IMPORTANCE**, an NSIP. We note RSP are now saying their DCO should be approved because it will be "carbon neutral & a blueprint for other airports" not that there is need. Firstly that does not make it an NSIP. Secondly there is no legally binding commitment to that end in the DCO so no guarantee RSP will meet that commitment. RSP say "As aviation propositions go, Manston is unique – because it will be built to be Carbon Net Zero from scratch," Manston being carbon neutral will not include planes, lorries & fuel tankers needed to service it.. Manston will not be unique in the airport being carbon neutral. RSP keep banging on about how green Manston will be but for a company so concerned with being green why are they building an airport that isn't needed within an mile of Ramsgate, town of 40,000 plus residents, that they will blight with noise & pollution that will damage our health. Manchester Airport Group are already claiming to be carbon neutral albeit with offsetting as present. They have commitment to achieve 'net zero carbon' by cutting their remaining carbon emissions to zero and removing the need for carbon offsets. Other airports will follow suit. In their own submissions RSP say it won't be carbon neutral from day one, Surely the green thing to do is don't build it ? Being carbon neutral does not make it of National Strategic Importance or needed which we thought was the criteria for a DCO to be accepted. There is absolutely no doubt that companies will wish to reduce their carbon footprint and this will have a big impact on investment such as at Manston. There is no legally binding commitment in the DCO to be carbon neutral anyway so it is just a distraction.

Andrew Stephenson in his decision that got quashed seemed to be saying that he passed the DCO by RSP because there *may* be benefits from the project. These benefits were not quantified or qualified. The history of Manston in its previous incarnations have shown that view to be incorrect. It never brought any real benefits apart from a few zero hours part time jobs. What it did bring, even as a very small operation, was noise and pollution over the town of Ramsgate. When open Manston had a high percentage of night flights as a percentage of overall ATMs. There is nothing to prevent this being the case again. There is nothing in the DCO to prevent it. We take RSP's claims that they don't need night flights with little credibility. That is why the 'need' question is pivotal, and ultimately

the only one that matters. There is a compelling case to show that there is 'no need' as evidenced in so many reports including from the DCO examiners & the DFT's own report from Ove Arup means that the 'benefit' argument is rendered irrelevant. As there is no need there would be NO BENEFITS, no jobs or no training.

We note during the DCO hearings RSP's expert Sally Dixon couldn't say whether Manston would be financially viable as it wasn't something she had been asked to assess. During the hearings it also came out RSP had no business plan & had done no costing of landing fees. They also never produced evidence of what they had spent on the DCO application in spite of being asked by the examiners. They can't name any investors nor could they name any air cargo company or any airline that has committed to use Manston. More recently they are now saying they don't have to prove need. Given all that we have to wonder exactly what merit their DCO application has. Our understanding is a DCO application has to be of national strategic importance and a balance of the need verses the negative impact on people's lives and the environment. I would say to the secretary of state for transport that RSP's DCO application fails on all counts.

RSP say e-commerce is driving demand for air cargo but this graph shows growth in air cargo has at best stagnated whilst e-commerce has grown dramatically.

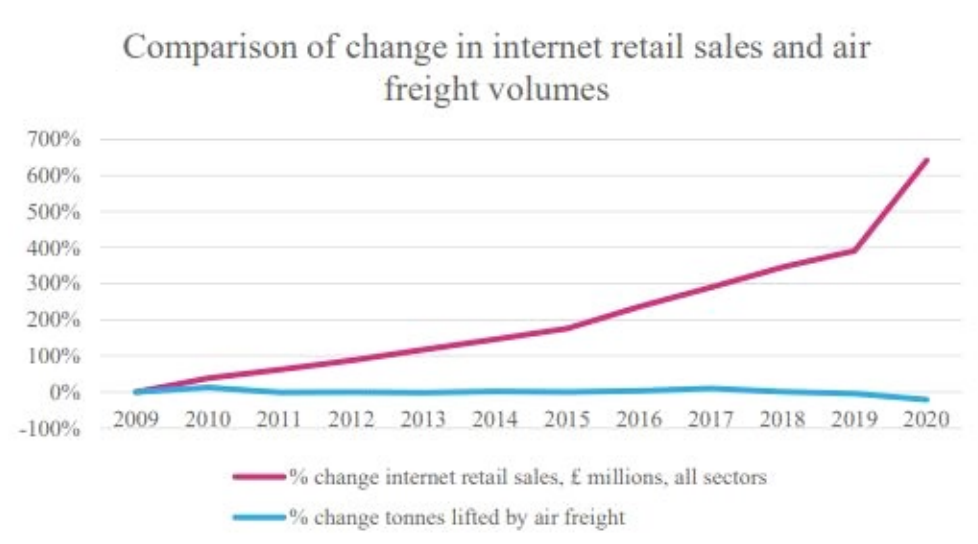


Figure 1: Change in internet retail sales and air freight volumes indexed from 2009^{19 20}

I also note RSP's claims regarding problems with cargo sent by sea is driving demand for air cargo. These problems are being caused by the sudden return of demand & containers being in the wrong places. It is also being caused by a shortage of HGV drivers needed to take cargo onto its final destination causing a backlog at ports. Both these problems will resolve in time. The shortage of HGV drivers at present will cause the same backlog at airports as it has caused at ports so there is no advantage in flying in goods.

CHANGES SINCE THE LAST ROUND OF SUBMISSIONS

Gatwick airport has started the consultations needed to apply for a DCO to bring the northern runway into use. This will increase passenger capacity by 21% (62million to 75 million) with the associated increase in bellyhold.

Southend airport passenger terminal been shut & mothballed after EasyJet & Ryanair pulled out. They are looking for airline companies to use Southend

John Holland-Kaye has said due to the impacts of Covid and the drop in demand the runway at Heathrow will not be needed for 10-15 years at least.

Sir Howard Davies, who recommended the expansion of Heathrow airport as part of a 2015 government review now thinks the pandemic may have derailed the need for the project. Sir Howard Davies led the Airports Commission report which concluded that a third runway at the airport in west London would deliver jobs, make more long-haul routes profitable and boost the economy. Davies has now said he would need to review the financial case for the project in wake of covid-19 and added changes to international travel habits caused by the pandemic meant there were now serious doubts about whether the project should ever go ahead.

When asked if the new runway was needed, according to a report in The Times, Davies told LBC radio: "Not at the moment, quite clearly. Heathrow would be delighted to fill the two runways it has got just at the moment and it's nowhere near it." Asked if he was still in favour of the project, he said: "I would have to redo the numbers to see if the economics made sense."

Davies did say that, if a new runway were to be needed in the South-east, it should still be at Heathrow.

THE LOCAL PLAN

In their submission of 9th July TDC are trying to infer that in the local plan Manston is reserved for aviation only whether or not the DCO is passed. This is not true. I suspect some TDC councillors are trying to influence the DCO decision and TDC should have submitted the wording from the plan which makes it clear it isn't.

1.38 The Council recognises that proposals are being put forward by River Oak Strategic Partners for an airport operation at the site, through a proposed development consent order (DCO), pursuant to the Planning Act 2008. The application is before the Secretary of State for consideration and the proposals are subject to thorough scrutiny as part of this process. A DCO, if granted, would give consent for the project in recognition of its national importance and may also include authorisation for the compulsory acquisition of land to assist in the achievement of its objectives.

1.39 If a DCO for Airport use is granted, the early review of the Plan will need to take this into account as well as its implications for other policies in the Plan and consequential land use considerations. In the event that the DCO is not granted or does not proceed, the Council will similarly need to consider the most appropriate use for the site as part of the early review. Policy SP07 – Manston Airport Manston Airport as identified on the Policies Map is safeguarded for airport related uses.

Whether or not the DCO is confirmed, the future use and development of Manston Airport and/or other policies affected by the outcome of the DCO process will be determined through the early review of the Plan.

It is noteworthy that since Manston, a brown field site was removed from the local plan, against planning officers advice, there have been many planning applications to build houses on prime arable land around Thanet. The governments preference as evidenced by their announcing nearly £2bn in funding is to build homes on brownfield sites in England. The Treasury said 160,000 "greener" homes could be built on such sites.

TRANSPORT LINKS

RSP are trying to say that Parkway rail station is a good connection for Manston Airport. This new station is purely for passengers only. There are no sidings or plans for any to handle freight so it will have no connectivity to forward cargo as RSP are trying to imply. The main route from Manston to connect to the motorway network is via the A299 & M2/A2 to meet the M25 at Dartford. Both the A299 & M2 are both just 2 lanes and are very congested. The junction with the M25 and the Dartford crossing are regularly at a standstill. The port at Ramsgate is not being used by any commercial carriers and there is no prospect in the near future so for RSP to say there are good transport links by road, rail & sea is absolute rubbish.

CLIMATE CHANGE/ CO2 TARGETS

It seems that we are getting more & more extreme weather incidents with the rains in Europe & China . Three months rain fell in Germany in 24 hours. Record breaking high temperatures 4-5°C above previous record highs in places like the USA and Canada where they are predicting extreme temperatures will make large areas uninhabitable in a few decades. Massive amounts of methane, a greenhouse gas, are being released in Russia from melting permafrost which is adding to global warming. The German government is saying this is down to global warming and yet our government isn't really actually doing much. Climate scientists & meteorologists are saying the temperatures of 40c could be the norm in during UK summers even if global temperatures are limited to a 1.5c rise. This would mean more extremes of weather. There was only an average temperature difference of 5c since the last ice age.

We could have understood if the government had overruled the examiners recommendations with the Vattenfall wind farm DCO. That would have made sense to us and we are sure could have been justified. HMG talk about carbon budgets when it seems that budget may have to be near enough zero. We hear talk of carbon offsetting but that is just spin. The only way to lower carbon in the atmosphere is not to produce it. We don't know how TDC can reconcile their support for RSP with their stated carbon neutral goal. Given that we are at present hosting the COP26 climate conference and Boris Johnson is trying to get the world to commit to lowering CO2 emissions it would send out the wrong message to pass a DCO for an airport that has been shown to be not needed It is certainly inconsistent with the message that we need to take climate change seriously.

RSP's JOB CLAIMS

There is no employment justification. According to data unemployment has fallen in Thanet by **27.2%** since the airport was open in August 2013 and unemployment in the 18-24 age group has fallen by **32.9%**.

Roger Gale stood up in House of Commons on Wednesday 15th September and said that there were huge numbers of unfilled job vacancies in Thanet - especially at Thanet Earth.

Taken from Hansard

" I know that my right hon. Friend wants to see the United Kingdom growing more crops. We are not going to blaze a trail to self-sufficiency by building over our finest agricultural land. That has to stop, now. On this, Back British Farming Day, we are in harvest time, and all is not safely gathered in. In three weeks, Thanet Earth in my constituency, which is one of the largest glasshouse companies in the country and grows tomatoes, has had to trash £320,000-worth of produce because there are no pickers and no drivers. Because of the lack of labour force, the crops are rotting in the fields and on

trees. Will my right hon. Friend seek to introduce immediately a covid-recovery visa, so that this year's crops are not lost? "(903446)

Hospitality & tourism are big employers in Thanet & specifically in the 18-24 age group. This sector has been badly hit by the Covid shutdown. There are no doubts most losses are down to the covid pandemic and these sort of figures will be reflected nationwide. Once the country is able to fully open up these jobs will return. Prior to covid and post Manston shutting as airport unemployment dropped in Thanet. The DCO examiners concluded RSP's job projections were flawed and every job gain at Manston would be at the expense of one at another airport plus jobs in the hospitality/tourism sector a big employer in Ramsgate would be hit by tourist numbers dropping due to the negative effects of low flying planes over the town.

RSP have never qualified or quantified the jobs that would be available at Manston, they have just picked a number and use some obscure "multipliers" to come up with an unrealistic number. They also quote jobs being available to anyone within a 90 minute commute, hardly local jobs given that London is an hour away. TDC have just quoted unemployment statics without any context as to how they expect the DCO to impact job vacancies. This isn't valid evidence of anything relevant to the DCO.

TDC are stating high unemployment in Thanet as a reason to pass the DCO without saying why. We note they haven't given overall unemployment figures just the 18-24 bracket. According to data unemployment has fallen in Thanet by **27.2%** since the airport was open in August 2013 and unemployment in the 18-24 age group has fallen by **32.9%**.

The Tourism Economic Impact Study shows that, before the devastating impact of the COVID-19 pandemic, Thanet's visitor economy was valued at £352 million, after welcoming 4.6 million visitors in 2019. Independent research commissioned by Kent's official Destination Management Organisation has revealed that £25 million was spent on average in the local economy each month in 2019, as a direct result of the region's tourism and hospitality industry. The number of tourism jobs across the district showed a 9% increase between 2017 and 2019, to 8,664, accounting for 20% of Thanet's total employment last year. These are government figures. This is a sustainable industry that would dramatically be hit by noisy polluting low flying planes from Manston. This would hit the many small businesses in Ramsgate who rely on tourism nobody in their right mind would want to visit the area. Tourism to the area is more likely to bounce back quickly from the covid pandemic than aviation and employs more people than a cargo hub at Manston would. The truth is the many reports that have been published over a long period of time conclude there is no need for a cargo hub at Manston added to the fact it has failed three times already show there is no need. If there is no need it will not be viable and any benefits such as jobs will be nonexistent.

TDC SUPPORT FOR THE AIRPORT & BIAS

I feel that the DfT are getting a distorted view of support for reopening the airport. Unfortunately there are a disproportionate number of pro airport councillors on TDC. There are around 14-15 councillors who are members of SMAA, a group who actively lobby, raise funds and advertise in the local press on in support of RSP. The Leader of Thanet District Council Cllr Ash Ashbee, a councillor who has a long association of support for RSP, being a member of SMAA failed to declare this in her response to this process on behalf of Thanet District Council. She sent in a submission from TDC on her own it was not ratified by the whole council so it is worth pointing out that any TDC councillors opposed to reopening Manston and who wished to add to the submission never had the opportunity for any input. Councillors and residents were only aware of it once it had been published after being sent in. This is not democratic.

TDC are an absolute shambles. They have recently been audited by Grant Thornton LLP and were heavily criticised by them for ignoring and undermining expert advice. The leader of the council has called in central government to step in to deal with the culture at the council.

We would also point out Mr Piper a councillor implied there was some impropriety by RTC in commissioning an independent report. This was an unsubstantiated claim by Mr Piper and a complaint regarding this behaviour was made to council standards. The complaint was upheld.

CHARTERED INSITUTE OF TRANSPORT & LOGISTICS REPORT

RSP and SMAa are making a big thing of the Kent branch of the Chartered Institute of Logistics & Transport, CILT, report. The CILT as a whole have decided not to comment on this proposal. This was written by the Kent branch alone and does not have the endorsement of the CILT as a whole. In fact two Fellows of the CILT have come to a different conclusion, Mr Peter Forbes of Alan Stratford Associates, who wrote the report commissioned by Ramsgate Town Council and Professor David Lane.

Manston Airport

Received **07 October 2018**
From **Prof David Lane FCILT**
Representation

“ It is clear we need both jobs and housing. Both proposals for Manston therefore have merit.

The upside of the airport proposal is skilled jobs and the ability to attract further businesses to Thanet. The downside is the negative effect on people living in Ramsgate through the number of Flight's including night time the impact on the Development of the port as a leisure and transport facility. It will undermine Ramsgate as a residential area. In particular the stress on the road network will be overwhelming. The increase in heavy goods traffic is not sustainable.

The upside of the Stone Park proposal is the increased housing and leisure options which will add to rather than detract from Ramsgates development. It will bring jobs although not highly skilled ones. The success of the scheme depends on the other businesses it attracts and this is unknown.

Overall the downsides of the airport in terms on negative impacts on Traffic and amenities out weighs the benefits. I therefore oppose the airport development. ”

To be honest we found the report very poor indeed. Whoever wrote it was unaware of the regular major traffic problems around the Dartford Tunnel. Their comment about having an RAF standard runway close to Europe is frankly laughable, are they suggesting we will go to war with the EU ?

“Although the UK has enjoyed a period of peace since World War 2 the world currently faces considerable uncertainty and allowing the loss of the last remaining RAF-standard airfield to housing or other use in the area of the UK closest to mainland Europe appears to be a highly questionable strategic course of action.”

To us though the main significance of this report is Sally Dixon of Azimuth Aviation who are RSP's aviation advisors is a member of the Kent branch of the CILT. Given how out of step this report is

with other CILT members it would be naïve to think that Even if Ms Dixon didn't write it she did have a major input as it is in her interests as she is in the paid employment of RSP. It also seems that the only clients that have employed her to advise them on aviation have been headed by Tony Freudmann.

Manston's proximity to Ramsgate



This picture cropped from RSP's own literature shows the very close proximity of Ramsgate to the runway at Manston. The first houses at the end of the runway are on Nethercourt estate.

RSP's COMPENSATION

One final point I would like to know on what grounds RSP got £8.5m from the DfT in compensation for delays, who "assured" the DfT and what exactly does that mean ? At the end of the day the DCO was quashed so no planning permission. They couldn't have started work without resolving the HRDF relocation with the MOD. They have no CAA aerodrome licence or flight paths and more telling there has been no work started since the DfT returned the land. I know there have been several freedom of information requests to the DfT regarding this money but the DfT has been unable to show any evidence to justify this payment.

CONCLUSION

Mr Stephenson's previous decision to pass the DCO seems to have been give it a go and it might work out and there may be some benefits but all the evidence shows that to be faulty. The DfT and secretary of state for transport should listen to the expert recommendations of the DCO examiners. the report they themselves commissioned from Ove Arup and the previous 15 listed below all of which come to the same conclusion, Manston is not needed and would not be financially viable. We urged the Secretary of State for Transport to follow all the evidence and refuse this DCO application. If he should go against advice he has commissioned himself we will of course support a further application for a judicial review.

Ian Scott

List of reports

- 2010** BICKERDICKE ALLEN PARTNERS report night noise assessment
- 2011** YORK AVIATION Economic impact of night flying policy
- 2011** BICKERDIKE ALLEN PARTNERS noise
- 2014** FALCON report
- 2015** KCC position statement on Manston Airport
- 2016** TDC final report for Thanet District Council (TDC) Manston Airport Viability
- 2016** AVIA SOLUTIONS Riveroak response TDC Manston Airport viability final
- 2017** AVIA SOLUTIONS local plan representations review final
- 2017** AVIA SOLUTIONS analysis of report by Azimuth/Northwood on Manston
- 2017** YORK AVIATION for SHP summery report final
- 2018** ALTITUDE AVIATION report
- 2019** ALTITUDE AVIATION report update
- 2019** DCO Examiners recommending refusal of DCO on many issues including need
- 2021** YORK AVIATION for Jenny Dawes in redetermination of DCO
- 2021** ALAN STRATFORD ASSOCIATES for Ramsgate town council

I know copies of these reports have already been sent so I have not included them