

From: [REDACTED]
To: [Manston Airport](#)
Subject: For the attention of the Manston Airport Case Team
Date: 11 November 2021 17:08:43

Re: DCO Consent Order for the former Manston Airport

Yet again, we have been called upon to respond regarding the proposed airport development at Manston. This application was submitted for consideration as an NSIP - a National Strategic Infrastructure Project - I think it is important to keep this in mind when reading the following comments.

I'd like to begin by citing RSP's original claim that there is pent-up or suppressed demand for dedicated air freight services in the UK (& specifically in the south east of England.) RSP states demand cannot be met due to lack of runway capacity at existing airports. However, these claims have been shown to be completely false, supported by numerous reports, most recently in the Ove Arup report which agreed with the findings of the ExA in the outcome of the DCO process. The ExA concluded that Manston could only handle comparatively modest levels of air traffic and that these could be catered for by existing airports. In addition, the location of Manston was deemed unsuitable. The ExA concluded, "...the failure to demonstrate sufficient need weighed substantially against the case for development consent being given." (E.R 8.2.26). The Independent Assessor from Ove Arup agreed with these conclusions taking into account any changes in policy, demand or capacity that might impact on the ExA's decision and found that there had been no significant or material changes to policy or the quantitative need case. It seems crystal clear that if the development were to go ahead it would inevitably be a business failure as there is NO market need. All of this is pretty conclusive but there are also other pressing concerns as to why Manston should not proceed.

The Government's Jet Zero Consultation published on 14 July 2021, acknowledges that aviation is forecast to become the second highest residual emitter of greenhouse gas in 2050 (Foreword Jet Zero Consultation 2021). In order to mitigate this, the consultation document outlines ways to decarbonise the aviation sector highlighting, among other things, the development of cleaner aircraft and the creation of airspace and airports that are more efficient. Some of these aspirations relate to R&D and investment, but in the immediate future and by contrast, the proposed development at Manston is most likely to use older more polluting aircraft, potentially ex-passenger 747s which are the workhorse for cargo. Setting up a new small cargo airport far removed from the main industrial bases in the UK as an addition to current airport provision would also be counter-intuitive when seeking to rationalise airport operations and create more efficient use of airports and airspace. Indeed, it would be farcical and irresponsible to pursue this course of action when there is no justifiable need. Transporting cargo to and from Manston, situated in the furthest reaches of the south east of Kent, would also involve significant environmental impact. This would not be the "building back greener" the Government hopes the sector will achieve.

The Jet Zero consultation document also highlights other possible environmental benefits from building back greener such as reducing aircraft noise and improving

air quality. However, It's clear that developing a new cargo airport at Manston would result in exactly the opposite. It would blight the local coastal community and environment and bring significant harm to the growing tourist and creative economy which is so important for the socio-economic revival of Ramsgate and the surrounding area. According to the Economic Impact of Tourism, Thanet - 2019, produced by Destination Research: 8,664 jobs were supported, 7,576 tourism jobs directly supported, 1,088 non-tourism jobs with tourism supported. Overall these jobs accounted for 20% of Thanet's employment. Tourism has since increased. There would be no upside despite RSP promoting the notion of airport jobs for Thanet especially as some jobs will simply be displaced from other airports.

Aviation is known as a difficult-to-decarbonise sector and the Government's Jet Zero Consultation admits that COVID-19 has significantly impacted the extent to which the sector is able to invest in new more efficient technologies, systems or programmes. Now is not the time to set up a new cargo enterprise at Manston when other airports have proven capacity, when there is no proven need for Manston and when the climate crisis clearly demands that aviation becomes leaner and greener.

Yours faithfully,

Lesley Chater