

From: [REDACTED]
To: [Manston Airport](#)
Subject: Manston Airport (TR020002)
Date: 12 November 2021 18:00:39

Dear Team

Objection to Manston DCO

Our continued objection to the application by RSP (Riveroak Strategic Partners) for the lorry park at the disused Manston airstrip to be turned into a highly polluting, 24 hour freight hub is on the basis of the following as well as our previous submissions.

There has never been an accurately factual plan presented by RSP to explain any strategic national need for a freight hub on the remote site on the coastal tip of the East Kent coast at Manston. It's illogical.

This proposal has yet again been proven as not wanted by the vast majority of residents. This is evidenced by local election candidates being elected who clearly state their opposition stance to this proposal. And so many have and continued to win seats on this basis over time. We have all attended meetings for the consultation and for organised opposition to this plan. The amount of successful Green and Labour Party candidates on local councils bears evidence that the local population does not want a freight hub and will resist it. The local MPs were not voted in on a mandate for the freight hub. It was not even a footnote in Craig McKinley's campaign for his seat. The thrust of his campaign was to ensure Nigel Farage did not win the seat. Craig's election leaflets made no mention of the then defunct airport:

<https://www.souththanetconservatives.org.uk/craig-mackinlay-prospective-parliamentary-candidate-ppc>

RSPs application has also been assessed as **not of strategic national need**, and not viable by the following expert reports which no doubt your team have multiple links to refer to as provided throughout the previous streams of evidence supplied to the planning expectorate including more recently the latest report commissioned by the Secretary of State:

2010 BICKERDIKE 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

2021 OVE ARUP for DfT/SoS

What has changed are the unknowns of the fall out of Covid on the behaviours of the population worldwide and the climate emergency. The applicant has not provided any updated additional factual evidence that is measurable or accurate to support this application as a viable project or of nationally strategic need other than words to the effect that 'we are going to need this'. That is just nonsense and a bit like saying, 'this is more proof' but without actually providing any, yet again.

In fact, the very basic numbers that the author of this application has given just don't stack up.

Ms Dixon states that Ramsgate is 4 kilometres from Manston. In fact Ramsgate starts its dense population from the Nethercourt estate, built back in the 1950s when Manston was just an RAF airstrip.

Nethercourt estates is located just 1.37 kilometres from the end of the runway at Manston. The Secretary of State really needs to consider where this leaves the rest of the calculations in the application such as safety zones, air contours, flight path calculations etc. This is Scary stuff as she cannot calculate a simple, straight line!

The country does not need this freight hub, there is a plenty of capacity waiting at numerous other airports in England as and when the need arises. By the time extra capacity is apparent, the electric 'green' freight planes promised by the local MP may be available instead of the dirty, noisy old craft that this applicant is planning on allowing to use their site. They are so desperate that they are planning on allowing older Aircraft models which are now banned from other airports.

Given the continued and well organised freight route via Dover Port, 20 miles south of the proposed freight hub, RSP have not demonstrated that there is an additional need for a freight hub too. Sea freight is cheaper. It's absurd to locate an airport at the remote site of Manston only to be transported by road from one of the most extreme tips of the Kent coast at least 30 miles to the nearest distribution point for onward travel to West, South and North England.

Perishable goods would need to be dropped at a central England hub due to the excessive time onward travel from Far East Kent. So RSPs claim for that argument is defunct.

Dover channel crossing is 20 miles south of Manston but has a seamless link to the M20. So, an additional freight hub post Brexit is not still not required and there is still not evidence of that being a future need either.

Freight road traffic through the sea port has, if anything been lighter since Covid and shows no sign of reaching its pre Covid congestion rates as yet. Also there is the channel tunnel link through Folkestone, again, directly connecting to the M20 motorway.

Neither The applicant nor Sir Roger Gale indicate where there is any factually supportive information to back up their forecasts and mere suggestions that there is more need for this project, now or in the future as a result of Brexit. A national strategic need didn't, doesn't and never will exist and is not evidenced in any way. This is again the outcome of the report commissioned by the Secretary of State by OVE ARUP, since Brexit. We note Sir Roger Gale has not produced any factual evidence to support his claim regarding post Brexit needs either. Obviously, because there still is NO identified need.

The OVE ARUP report is excellent and well presented. We would urge the Secretary of State to be guided by this report outcome, and all the other expert reports that are very logical, accurate and factual. This application is a woolly, inconsistent jumble of drawings, words and numbers that does not stand up to scrutiny and that when presented to residents and the examining authority did/didn't have night flights and switched between scheduled and chartered labelling for flights to try to sneak in numerous night landings as part of their application whilst telling residents there will only be rare delayed landings at night. Also, regarding assurance of no night flights. In fact, whilst RSP and Sir

Roger Gale have both been misleading residents and even their own supporters telling them there will be no flights (Roger even repeated this during a recent television interview), their application clearly is requesting this with flights during the hours of 11pm and 7am. See section 6.8.50, 12,7,40

With regard COP26 outcomes the government will need to evidence its genuine sincerity to abide by reducing the country's carbon footprint and this application, on balance, must not be agreed on the basis that it is not required, harmful to the wildlife and historical local environment and to the entire population under the flight paths for take offs and landings as well as adding to the country's carbon footprint rather than reducing it. There is nothing in this application that gives any details or specifics on achieving a neutral carbon footprint, in fact they've admitted it won't be carbon neutral from day one. RSPs claim that their airport will be 'carbon neutral and a blueprint' is an utterly baseless claim, to put it politely. Their latest response/update to the Secretary of State is purely spinning catch phrases and words to try to avoid the fact that this project still is NO of National strategic importance.

There has been no detailed pollution reports or forecast by RSP on their proposed freight hub construction, dismantling of planes and nor of forward operation details including what their road freight pollution might be and what their carbon neutral plan would look like. It's all very vague spin. Nothing that has been added since the examining expectorate investigations makes this any more than a continuing atrocious application. The plan is not at all robust and leaks like a sieve.

The local face of RSP is Tony Freudmann, the struck of solicitor. We have run a Linked-in check on him recently and the information shows as follows:

Tony Freudmann Owner, FT International Ltd London, England, United Kingdom

There is a link to RSP beside this information and then a link to his personal website:
<https://syndicate.casino> (<https://syndicate.casino/>)

As you can see this is a casino website. This doesn't surprise us at all as Mr Freudmann is known locally as, one not to put trust or money in. He was the Senior Vice President of Wiggins Airport (Planestation) that ran flights previously from Manston before it folded as a financial disaster around 2005. This was after investors, many local residents had bought shares in the company he directed and they lost every single hard, earned penny.

As for a detailed business analysis to back up the application, Sally Dixon admitted to the examining authority that she was never commissioned to look at costs. RSP didn't and still hasn't got a business plan and could not/would not identify any investors. How any Secretary of State could sign off such a ramshackle proposal, the nub of which includes health and safety of the locally affected population, with such limp information provided to the examining expectorate and active avoidance by RSP to provide the information to the examiners that RSP were asked for, was astonishing. Hence the ground swell of support for the last judicial review, of which we are fully prepared to continue to fund going forward.

As for the ex-Airport employees who want the airport back, one must ask why they have not sought alternative employment in the intervening years since 2014. The RSP application for a DCO includes the very vague projection of tens of thousands of job numbers to sell it to locals. At the local consultations they were promising training for skilled/unskilled workers and jobs in the tens of thousands to lure residents to favour the project. This is in the full knowledge that those numbers quoted were never realistic. At the examining authorities meetings it was difficult for RSP to control and manipulate and bully. The figures were downgraded as a result of the expert questioning of examiners who elicited the more realistic forecasts which it appears included all jobs including harvesting and production jobs that would feed into the flights into this country as well as jobs within a 90 miles radius of the hub, of which RSP still gave no specific details. Many jobs were not really anything to do with this application. Just more massaging of numbers to try to make this application appear something other than it is.

Since Covid19 hit, airport skilled worker numbers country wide have reduced and due to automation it is highly unlikely that many jobs will ever be back up to previous numbers. And RSPs projections went from many thousand promises of direct jobs in their application to very spongy numbers, remotely linked industry jobs including mainly in other countries and other areas of this country that may be related to the packing and movement of cargo. Also sitting at the examination meetings, one got the impression that RSP want to take work away from other UK freight providers, so this provision

already exist elsewhere (and still has capacity). There was never a proven case of strategic national need due to the sufficient services and capacity offered at existing airports. Existing airports freight capacity has increased due to the reduced need for passenger flights since Covid restrictions and that factor is still limiting long haul passenger travel, therefore more belly hold.

Even when passenger flights increase in real terms that will equate to more belly hold as airlines have reduced passenger luggage over the years to accommodate more cargo. It is more financially lucrative for them. We've all noticed how many less extras we can pack in our suitcases and the dread placing them in the airport weighing machines. The passengers cover the cost of the flights and the cargo is the airlines lucrative profit.

Post Brexit there is still no recorded or proven increased need for a dedicated freight airport in East Kent. RSP don't provide numbers or facts on this as it doesn't exist. They obviously think by writing it down it will be believed. On the contrary the operation Brock for processing freight has not been required in Kent for many months. Fact. Use of the Manston site to process freight out of England to Europe has been stopped and was handed back from the government to its owners. Fact. Although, how and why, over £8 million of taxpayer money was paid in compensation for a delayed freight hub which didn't even have an agreed DCO is still in question.

RSPs latest spin on words point to the Parkway rail station as a major connection for cargo to be transported away from the airport. Please do not be fooled by this misinformation.

The station is currently under construction and is located adjacent to lower Cliffsend Town and has no plans or facilities for freight lorry drop offs or any type of commercial cargo as it is passenger only. There are no sidings for freight trains and cargo is not planned for the future nor will it be viable in the small holding. It is also further away from the proposed hub than Ramsgate town that starts 1.37km from the runway. Again, RSP are grasping at straws and their assertion is not based on fact. Please see the link below to plans which indicate quite clearly cargo is not and never can be a feature at Parkway Station due to the size limitations of this station. It is a commuter link aimed at the discovery park south towards Sandwich. Honestly, RSPs assertions become more farcical, the more desperate they become.

https://www.kent.gov.uk/__data/assets/pdf_file/0011/111026/Thanet-Parkway-Station-plan-1.pdf

The existing freight managing airports are already co-located close to very efficient transport links and cargo processing facilities, some of which are on-site such as the East Midlands airport which boasts, central UK location adjacent to the UK motorway network with over 89% of England and Wales within a 4 hour truck drive-time. Hence Manston will not be able to compete to take business away from such enterprises.

Also, Southend airport has now been mothballed so there is already a functioning airport with ample availability and resources there. Southend airport is far, far better located than the far tip of east Kent.

This RSP DCO application, due to its location, will not be efficient for onward transport. This was a major factor as to why the previous freight and passenger flight businesses failed each time. Therefore, the need for an additional freight airport in this very, very remote part of England, which, as all the expert reports indicate is not a strategic national need, and will never be viable

The local economy has been a blossoming tourist industry. This was already improving since 2014 and has increased exponentially since Covid due to staycations. All the employment and prosperity that this has brought will be decimated if there is a polluting, noisy, 24 hour cargo hub located at Manston.

With regard the unemployment rates cited by various other submissions recently in favour of this application, it is worth noting that the jobs vacancies since Furlough has ended has increased locally particularly in the Hospitality and Health sectors. Also since Brexit, one of our local MPs Sir Roger Gale, has been very outspoken publicly in the Houses of Parliament (see transcript below), and has made a request for access to foreign Labour in light of the lack local Labour supply just a few months ago. So locally there is NOT a shortage of jobs. An automated freight hub will not answer the unemployment issues in Thanet if skilled and unskilled positions are already available but are not the answer.

'One of the Secretary of State's responsibilities is the provision of an adequate supply of domestically

produced fruit and vegetables. Much of this year's harvest has been lost as a result of a lack of labour. Contrary to popular belief, there is not a queue of domestic labour waiting to harvest apples and tomatoes. Having lost this year's harvest, what will my right hon. Friend do to ensure that there is adequate labour supply for next year?'

In conclusion this is a very dubious, factually incorrect application (and therefore potentially highly dangerous with regard to safety zones or any other factors where quite crucial calculations are involved) for a DCO for a 24hr, highly polluting freight hub that has no investors and flies in the face of the climate emergency need for Greener planning. It is not needed or wanted for the following reasons:

Proven lack of strategic national need

Residents will be subjected to relentless noise and air pollution

Disruption to the local wildlife and historic environment

Poor effects on quality of life for residents increasing mortality rates and stress on healthcare provisions

Disruption to the education of Ramsgate children

Negative effects on residents in an area of poverty with no significant evidence of increased employment options appropriate to their needs

Damage to the growth of the local blossoming tourist industry

The proposed plans are technically inaccurate and very flawed

We continue to firmly object to this application.

Yours sincerely

Interested Parties

Laurie Hudson

Martin Hudson

Nicole Hudson

Geoffrey Booth

Jodie Hudson

Luke Hudson

Daryl Booth

Lindsey Booth

Fatima Booth

Jason Booth

Jim Booth

Holly Booth