

## **Hilary Scott. REF: 20014097**

### To the Secretary of State for Transport

Dear sir I am writing to express my continued opposition to Riveroak Strategic Partners (RSP) plans to reopen Manston as a freight hub. It has now been shut for over seven years and time has moved on. Nobody in their right mind would suggest opening an airport less than a mile away from a town of 40,000 people with all the health issues it will cause from noise and pollution if there hadn't previously been an airport there. I note that the latest report from Ove Arup commissioned by the DfT echoes the finding of the DCO examiners and every expert opinion published in that there is no need and other airports have capacity. It seems the only report in support of such a hub seems to come from Sally Dixon. Even minimal research shows she has only ever been employed to comment on matters dealing with aviation by companies associated with Mr Freudmann and has no history of being an aviation expert. There has been so many evidenced submissions to show there is no need for a freight hub at Manston I don't feel it is necessary to add to that very long list. These reports added to the fact it has failed three times and lost tax payers & investors tens of millions should be proof enough of the need for the DfT to refuse this DCO application by RSP. On social media & local press comments I have seen that members of the Save Manston Airport Association are attacking the many reports that have concluded that just isn't needed or viable but do not produce any expert advice to back up their position.

Given that there is so much evidence and expert opinion showing that a cargo hub at Manston is neither needed or financial viable to pass RSP's application will make a mockery of the whole DCO process and bring it into disrepute. It will certainly have an impact on future DCO applications for projects that are needed and viable.


I am very concerned about the impacts of noise & vibration on the historic buildings in Ramsgate. There is also an SSSI at Pegwell where birds and wildlife have flourished since the airport shut. There are so many negative impacts of this proposal by RSP on the local area that will make life unbearable for the majority of people.

To open an airport that has been shown not to be needed is entirely inconsistent with the government message that there is an urgent need for CO2 emissions to be dramatically reduced to tackle climate change and keep temperature rises down to 1.5c. With the CO26 still in process it would be hypocritical in the least given the UK government is asking other countries to reduce their carbon footprint. RSP say that the DCO should be passed because Manston will be "carbon Neutral" Firstly there is no legal commitment to this in the DCO and secondly this does not include the planes, HGV lorries and aviation fuel tankers that will be needed to service it.

There is also the risk of reputational damage to the Secretary of State and the Department of Transport given there seems to be very little due diligence regarding the finances of RSP from any government agency. Again very basic research shows Mr Freudmann as being struck off as a solicitor for misappropriating clients funds. It shows he has never been involved in a successful business and while he says Manston failed before because it was poorly run fails to say he was in charge there during two of those failures which lost tax payers and local investors their money. There is also the situation that current investors are shrouded in secrecy as RSP is being funded through Freudmann-Tipple by an offshore company based in the British Virgin Isle. This money could be coming from anywhere and nobody would

be none the wiser. This all has the makings of another Seaborne debacle. It seems to me that passing a DCO applied for by company that is fronted by Mr Freudmann could have consequences.

The CAA have refused once again to pass RSP's application on to the next stage. For the CAA to refuse to pass their application on at such an early stage doesn't bode well for a company wishing to run an airport with all the health & safety issues that will raise.



**MANSTON AIRPORT (FASI SOUTH)**

**Develop & Assess Gateway Outcome - 30<sup>th</sup> July 2021**

[STATEMENT]

As part of 'Stage 2 – Develop & Assess' of the CAP 1616 airspace change process, the UK Civil Aviation Authority has completed a Develop & Assess Gateway Assessment of RiverOak Strategic Partners (RSP) airspace change proposal (ACP) – Manston Airport FASI-South (ACP-2018-75).

In order for the CAA to allow an ACP to pass through the Develop & Assess Gateway:

1. the change sponsor must have produced a comprehensive list of airspace change design options;
2. the change sponsor must have engaged with relevant stakeholders to explore those options to the CAA's satisfaction against the requirements in Appendix C;
3. the change sponsor must have produced a design principle evaluation that the CAA has accepted, showing how its design options have responded to the design principles;
4. the change sponsor must have produced an Initial options appraisal (phase I);
5. the CAA must have produced and then published an assessment that the options appraisal is satisfactory against the requirements in Appendix E.

In our Gateway Assessment, the CAA concluded that the submission did not meet Criterion 3 and Criterion 5 above for the reasons set out below:

1. **Criterion 3 (Design Principles Evaluation):** The development of the baseline ("Do Minimum") scenario and comparative assessment of the suggested design options against the design principles did not evidence clearly that the design options had been adequately assessed against the design principles. (CAP 1616 - Step 2A Para 128 and Para E21).
2. **Criterion 5 (Initial Options Appraisal):** In Step 2B, the presentation of the Options Appraisal (which built on Step 2A) did not allow us to conclude that it had been correctly undertaken. (CAP 1616 - Step 2B Para 133 and Appendix E Para E12).

The Civil Aviation Authority has informed the change sponsor of this decision. In line with CAP 1616, the change sponsor is now able to reconsider its submission before resubmitting it for further review by the Civil Aviation Authority at a future Develop & Assess Gateway.

It is important to note that whether an ACP passes a gateway successfully or not does not predetermine the CAA's later final decision on whether to approve the airspace change proposal. This decision is not an explicit or implicit comment on the merits or otherwise of this ACP. This will come at the decision-making stage (Stage 5).

[END STATEMENT]

A DCO should be in the national interest and balanced against the negative impacts on the environment and people's health & lives. With all the evidence submitted I would say that RSP's application is very heavily weighted in being refused I therefore urge the Secretary of State for Transport to do the right thing for the people of Ramsgate & the environment and refuse the DCO application from RSP

Hilary Scott