



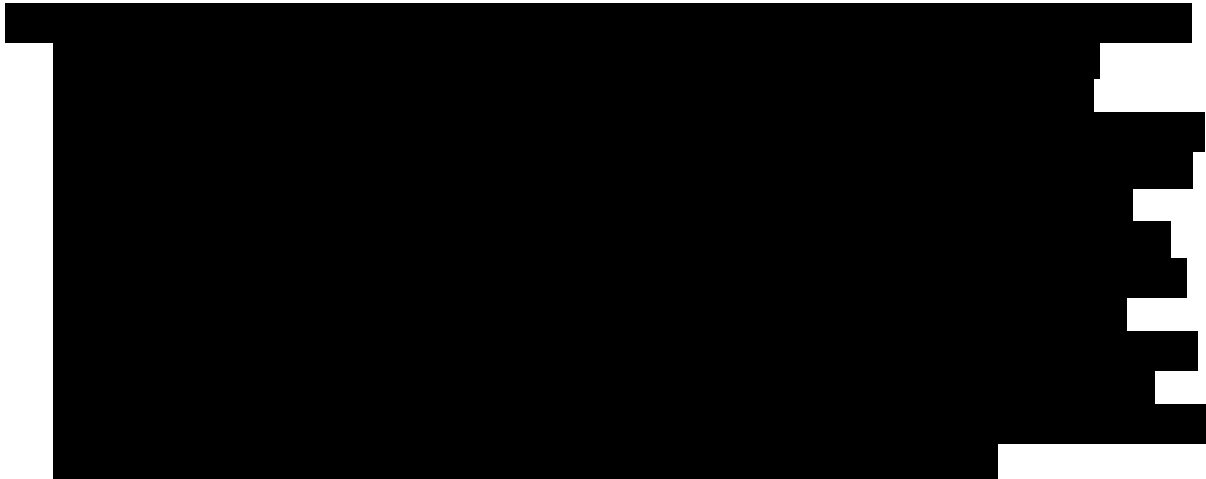
November 2021

# No Night Flights

**NNF26**

This submission draws heavily on one of our previous submissions, NNF 13 – Need, but has further work added. We believe that the case for need, or not, is fundamental and that, given this relies not simply heavily but almost solely, on the work of Dr Sally Dixon, it is worth re-emphasising the [REDACTED] and her role vis a vis the RSP application.

1. RSP's entire case that a reopened airport at Manston could meet the criteria for an NSIP is built on the work of one person – Dr Sally Dixon.



3. NNF has submitted four volumes of work which are well-researched, evidence-based critiques of Dr Dixon's work. In addition NNF has submitted a fifth volume – a factual review of the UK air cargo sector. NNF does not intend to go into all the factual shortcomings of Dr Dixon's arguments here. If the ExA reads those NNF reports (NNF06, NNF07, NNF08, NNF11, and NNF02 "No Room for Late Arrivals"), it will see the many ways in which her assertions lack factual foundation.
4. The focus in the pages that follow is first to deal very briefly with Dr Dixon's overall approach to her four reports and to set out how that approach falls far short of the standard that one would expect in a planning examination of this potential significance. We then go on to provide specific responses to the Applicant's answers to the ExA's questions on the subject of Need.
5. It is not necessary to possess special expertise in the topic to see that Dr Dixon's work is fatally flawed:
  - 5.1. Dr Dixon has consistently relied on and interpreted two reports by York Aviation, despite York Aviation's repeated public statements that she has misunderstood and misrepresented its work. This fatally undermines Dr Dixon's credibility.

---

<sup>1</sup> Dixon, S. 'Managing the Masterplanning Process: How do airport managers incorporate stakeholder contributions in their final master plans'. P.30

- 5.2. She has disregarded official data from the CAA and forecasts by the DfT about the long decline in the UK dedicated air freight market.
- 5.3. She quotes selectively from her sources, disregarding or falsifying the picture apparently intended by the author. In our critiques NNF has set out numerous examples of this. This tendency by Dr Dixon means her work cannot be relied upon as being a fair reflection of the sources she quotes.
- 5.4. She quotes from papers that are not available to the public.
- 5.5. In calculating her demand forecasts – central to the RSP proposal – she dismisses a normal analytical quantitative approach in favour of a qualitative judgement. She then relies on a small and unrepresentative sample of industry-related interviews. She pays most attention to the minor players. Coyne Airways – a cargo airline with a fleet of just four planes – and the local hauliers represent 90% of the interview quotations in the Azimuth report. This is vitally important as these interviews are the basis for everything that follows – the cargo ATM predications, the NSIP proposition and then the job numbers. They are at the heart of RSP's claim that this proposal qualifies as an NSIP. Dr Dixon's "qualitative methodology" doesn't lend itself to scrutiny – we'll never know what convinced Dr Dixon to arrive at her ATM forecast. For the ExA to rely on her work as a sound basis for a forecast of 17,100 cargo ATMs in year 20 would be an act of faith, not of evidence-based judgement.
- 5.6. Dr Dixon says it is necessary to translate her qualitative interviews into a quantitative forecast. However, she then eschews what she describes as "the difficulty in identifying a realistic formula" in favour of describing how she believes commodities are "likely" to be transported in the future. That is not a sound basis for determining an NSIP.
- 5.7. She then applies a multiplier to her annual ATM forecast for years 11 to 20. That multiplier is 4%. In each of the three different iterations of her work to date she produces a different source for that multiplier. None of them is credible. She cites an Airbus global growth forecast that is not in the report she cites. Next she cites the DfT which has said that it anticipates zero growth in UK cargo ATMs. Finally, in her July 2018 report she quotes no source at all.
- 5.8. Dr Dixon then demonstrates a basic failure of arithmetic. The DfT's figure of 4% (which she misapplies) describes growth in the amount of cargo on freighters (not growth in the number of freighters) over a period of five years. Dr Dixon applies that 4% annually, meaning that the growth in her long-term forecast of cargo ATMs starts in a bad place and is then absurdly exaggerated.
- 5.9. Dr Dixon fails to take account of the Airports National Policy Statement which says that an additional runway at Heathrow will allow Heathrow to handle twice as much freight as it handles today. She contradicts the Government – whose view was arrived at following years of consultation and research by the Airports Commission - saying that, even when the new runway is in place, "there will be a need for

additional capacity particularly for freight". She provides no evidence to support this assertion.

- 5.10. She says that the UK needs a new cargo airport at Manston because "By 2000, UK air freight had become constrained". She ignores the fact that Manston was operational between 1999 and 2014, handling just 550 cargo ATMs a year, and yet the market did not flock to use Manston in what she claims were years of constrained capacity.
  - 5.11. She overlooks the current capacity for tens of thousands more cargo ATMs at East Midlands and Stansted, let alone the additional capacity at some other regional airports.
  - 5.12. She fails to assess the plusses and minuses of the UK's established competitor airports against the criteria used by freight operators. She also ignores the plans for capacity increases at major UK freight airports.
  - 5.13. She suggests operators currently sending air freight by truck would fly that freight to Manston instead were it open. This ignores the role that trucking plays in the movement of air freight across Europe (not just the UK) and she provides no evidence to support her contention.
  - 5.14. She relies on global forecasts which are built on trends in the global market which have not been experienced in the UK.
  - 5.15. She uses forecasts of freight tonne kilometres (FTKs) to suggest an increase in UK cargo ATMs. The two are not synonymous
  - 5.16. She uses passenger growth trends and forecasts to suggest a need for a new cargo airport
  - 5.17. She relies upon studies that either measure the wrong metric; or measure the wrong market; or that focus entirely on London; or are already demonstrably over-inflated; as well as relying on forecasts whose author says she has abused and simply failed to understand the work.
  - 5.18. She says that e-commerce will increase demand for air freight, ignoring the fact that ecommerce over the last two decades has come from nowhere to account for 16.5% of UK sales. However, UK air freight tonnage in that period stagnated at around 2.3m tonnes, and the number of freighter ATMs has fallen dramatically since 2000. Clearly, ecommerce is having little discernible impact on the number of UK dedicated freight ATMs.
6. We have been unable to identify who, if anyone, has peer reviewed Dr Dixon's work. ~~In any event her track record in the field of airport acquisition and development inspires little confidence in her abilities.~~ Dr Dixon has previous experience of Manston airport –

she does not come to this DCO process as an objective commentator, looking at the airport for the first time.

7. In the period 2000 to 2002, Dr Dixon worked at Wiggins with Mr Freudmann. Her role was Strategic Acquisition. She made recommendations as to which new airports Wiggins should acquire and wrote business plans for the airports in the Wiggins network. Wiggins' particular focus at that time was on former military airfields that had significant excess land that would be available for development – just like Manston. Not one of the acquisitions made by Wiggins in this period was a success: Dr Dixon had a major role in the airport acquisition strategy that helped to plunge Wiggins (by then renamed Planestation) into liquidation. This was the strategy that Mr May, a seasoned turnaround agent, described as [REDACTED] when he tried to rescue the company.

Dr Dixon has been RSP's de facto aviation expert from the beginning. We have disputed her expert status. [REDACTED]

[REDACTED] Recently, she was coordinating half term activities for local youngsters at Ramsgate Football Club.<sup>2</sup>

“ Dr Sally Dixon, who is co-ordinating the programme for RSP Manston Airport, said: “A hot meal and fun with your friends in the holidays should be on the menu for every child, but we know some families really need support to make this possible. Ramsgate FC has a brilliant reputation for their holiday camps and, when they told us there was no Government funding to feed these children over half term, we stepped in to help.

“However, we wanted to go further than just provide funding, We wanted to bring along some fun activities and share the skills and experience of the Manston Airport family too. We are working with Polar Helicopters and TG Aviation and will bring along some flight simulators that will allow the youngsters to take to the virtual skies as a pilot. The activity will be overseen by a pilot trainer who will talk to the youngsters about the skills needed in a variety of logistics jobs.

“I am also delighted to confirm that local food producers, including SW Highwood (Pluckley) Limited, Prep World and Thanet Earth are also supporting the programme, providing fresh produce that the club's chefs will use in the menu. We are really grateful to everyone that has helped us make this possible – this is a real Thanet effort to ensure these youngsters have a fantastic half term.”

[REDACTED]

[REDACTED]

---

<sup>2</sup> <https://rsp.co.uk/news/rsp-manston-airport-helps-kids-have-fun-and-stay-fed-over-half-term/>