

From: [REDACTED]
To: [Manston Airport](#)
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Subject: Changes in Bellycargo and Freighter air freight tonnages mid-2019 to Sept 2021
Date: 21 November 2021 15:31:01
Attachments: [Changes in Bellycargo and Freighter air freight tonnages mid-2019 to Sept 2021.pdf](#)

Changes in Bellycargo and Freighter air freight tonnages mid-2019 to Sept 2021

Re-determination of the Application by RiverOak Strategic Partners Limited (“the Applicant”) for an Order granting Development Consent for the reopening and development of Manston Airport in Kent.

Save Manston Airport association (SMAa) has over 3,700 members who are in full support of the Development Consent Order to reopen Manston Airport, many wanting jobs for themselves, their family or other Kentish people. Thus, we wish to make further representations to assist in the redetermination of the DCO.

Please see attached :

Changes in Bellycargo and Freighter air freight tonnages mid-2019 to Sept 2021.pdf

This graph and its analysis is provided as a correction to the analyses and conclusions in the Draft Arup Report on pages : 16, 17, 18, 22, 23, 24, 25, 28, 29, 30.

For all the reasons outlined in this submission, we urge the Secretary of State to form his own opinions based on reliable data and, by giving comprehensive well-argued reasons, grant the DCO for the Manston Development.

Dr. Beau Webber
Chairman, Save Manston Airport association.

[REDACTED]
[REDACTED]
[REDACTED]

**From the SMAa Committee on behalf of the 3,700 members
Dr Beau Webber (Chairman)**

[REDACTED]

Changes in Bellycargo and Freighter air freight tonnages mid-2019 to Sept 2021. - 2021-11-17

In 2021-07 we submitted to PINS for consideration by the Secretary of State for Transport and Arup the document **“Do we have a new air cargo regime, post Covid, that Manston Airport could help facilitate ?”** with the two graphs as below, with links to the source CAA data :

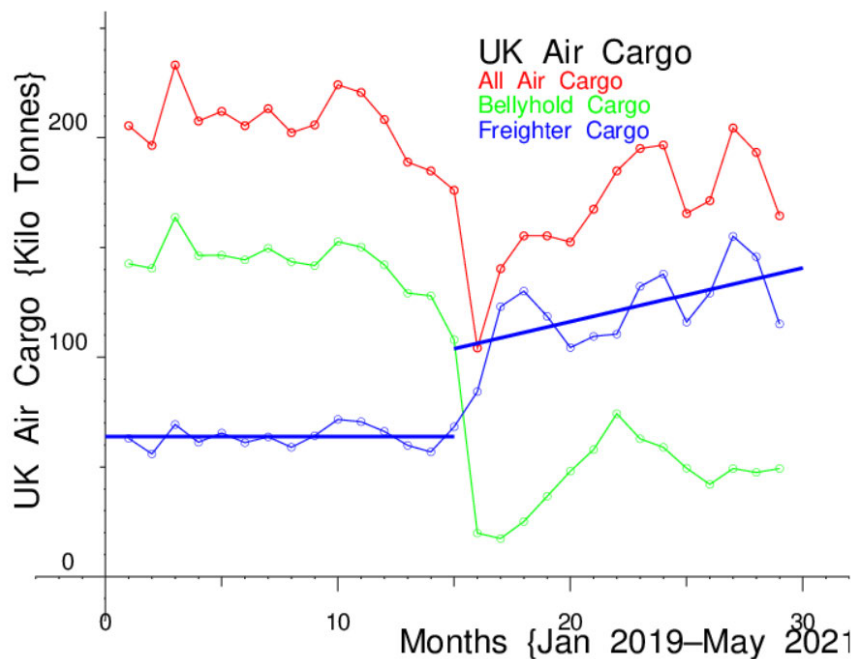
- 1) A graph plotting bellyhold and freighter air cargo tonnages, covering the time from 2019 to 2021, showing the crash in bellyhold cargo and the approximate doubling of freighter cargo tonnage and subsequent on-average linear rise at a rate of about 30 k.ton per year.
- 2) A graph with a linear projection of this 30 k.ton per year line to cover the first years of Manston airport operation, as predicted by Azimuth in their submissions to the ExA.

However, it is unfortunate that Arup do not seem to have seen these graphs:

They never refer to them, and indeed specifically say (P25) :

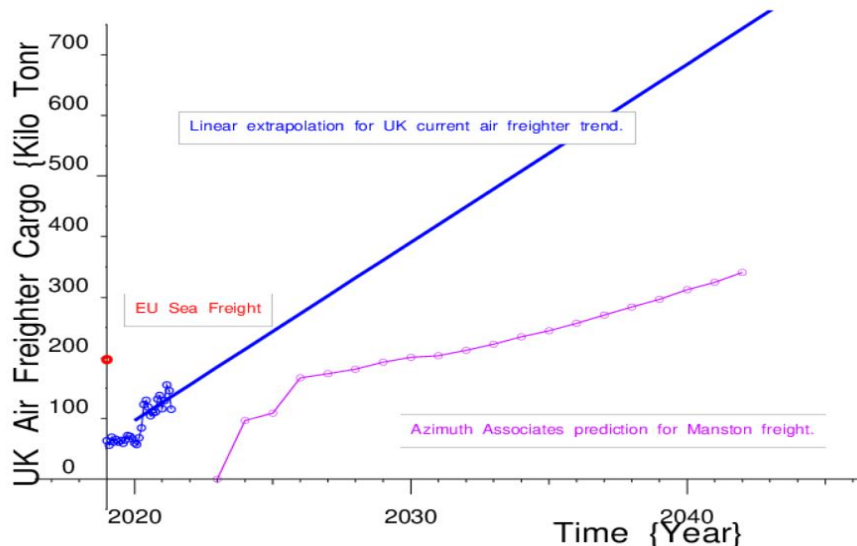
“The Independent Assessor notes that no forecasts of dedicated freighter use in the UK have been put forward through the SoM consultation.”

“Do we have a new air cargo regime, post Covid, that Manston Airport could help facilitate ?” :



It is immediately clear that there has been a doubling in freighter tonnage, and the straight line analysis indicates that it is increasing at a rate of about 30 k.tonnes per year, whereas bellyhold cargo is essentially static. Extrapolating this into the future, we get the prediction :

Manston Airport Freighter Comparison



Arup preferred to feature the opinions of a report commissioned by opponents of Manston Airport (York Aviation on behalf of Jennifer Dawes), and of someone who is not a resident of Thanet, without checking that their analyses and statements were complete and sensible and that they answered the questions that the SoS was asking:

Barry James' representation³⁷ assembles CAA statistics on air freight, noting that:

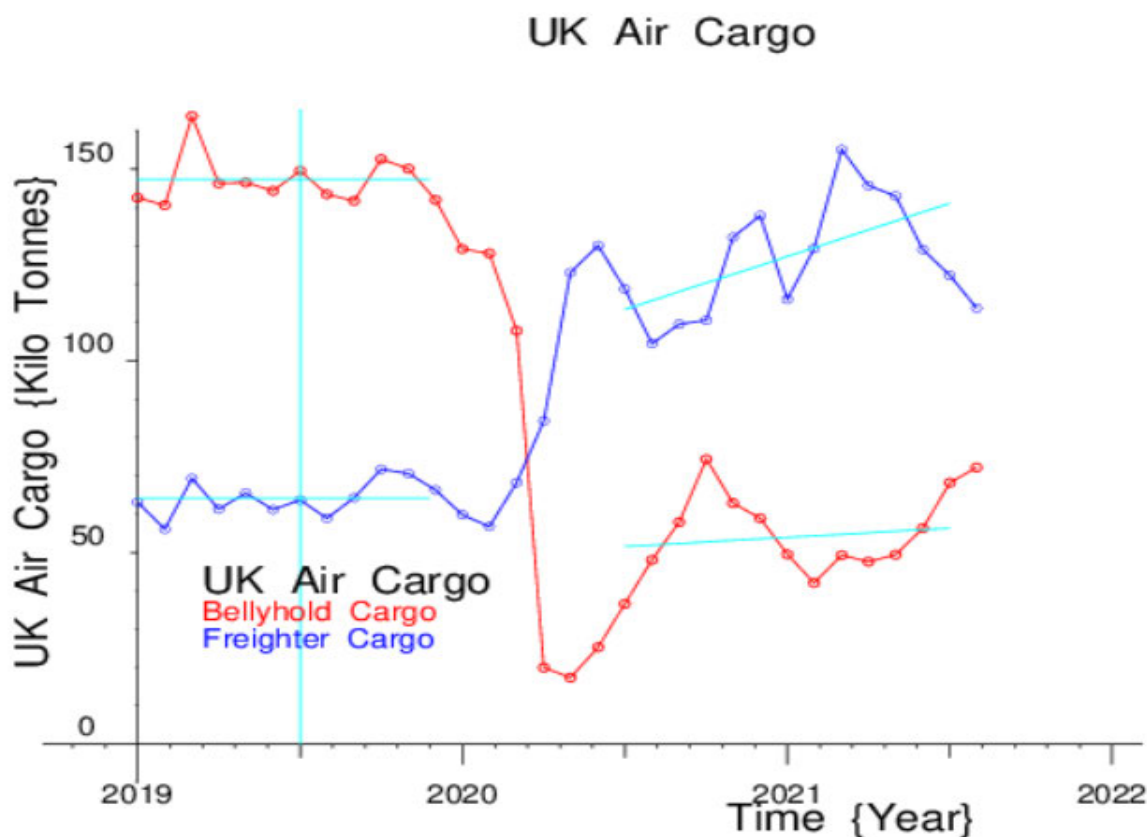
"...overall the tonnage flown is down 21% over the figures from 2019. Some of

Arup Figure 2 :

Figure 4.5: Air Freight Tonnes Handled at All UK Airports by Aircraft Type and Long Haul Bellyhold Capacity



We now have more CAA data (Appendix A), and can update the first graph :



(As usual, the last month's data is incomplete so the final data points are inaccurate.)

This graph is cited in the SMAa response(Part 1 page 4) to Arup report and is referred to as Graph 1.

We are, as per the SoS' guidelines, looking for changes in Bellycargo and Freighter air freight tonnages, since the key date specified, 9 July 2019.

At that time, both Bellyhold and Freighter tonnages were fairly steady :

Bellyhold average : 147 kTons.mo⁻¹
Freighter average : 64 kTons.mo⁻¹
A ratio Bellyhold / Freighter of about 2.3 in favour of Bellyhold.

Currently, we see that this ratio has reversed :

Bellyhold average : 54 kTons.mo⁻¹
Freighter average : 127 kTons.mo⁻¹
A ratio Freighter/ Bellyhold of about 2.4 in favour of Freighter.

The combined net change of the Freighter/Bellyhold of a factor of about 5.4 in favour of Freighter.
Freighter tonnage has doubled.

We also see that Freighter tonnage over the last year is further going up at an average rate of nearly 28 kTons per year, consistent with many industry reports.
Whereas the average tonnage rate for Bellyhold over the year is nearly static.

We further note that the Draft Arup Report reaches conclusions that are at variance with the above data and graphs, on pages : 16, 17, 18, 22, 23, 24, 25, 28, 29, 30,

- as analysed in submission "*The SoS asks for evidence; the Draft Arup Report provides mostly opinions and demonstrably wrong conclusions.*" and associated spreadsheet.

Here is robust proof that the "facts" and "conclusions" in the Draft Arup Report are frequently demonstrably wrong. These must be corrected, which then makes their final conclusions completely untenable and in need of revising.

Dr. Beau Webber
Chairman, Save Manston Airport association.

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<https://scholar.google.com/citations?hl=en&user=2Vxx03MAAAAJ>

Appendix A :

[CAA]

<https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-Airport-data/>

Year	Month	Months	Years	BellyHold	Freighter
2019	1	0	2019	142565	63043
2019	2	1	2019.083	140584	56047
2019	3	2	2019.167	163855	69280
2019	4	3	2019.25	146284	61279
2019	5	4	2019.333	146491	65507
2019	6	5	2019.417	144345	61117
2019	7	6	2019.5	149622	63704
2019	8	7	2019.583	143470	58947
2019	9	8	2019.667	141754	64211
2019	10	9	2019.75	152625	71662

2019 11	10	2019.833	150134	70623
2019 12	11	2019.917	142040	66226
2020 1	12	2020	129169	59826
2020 2	13	2020.083	128061	56801
2020 3	14	2020.167	107875	68210
2020 4	15	2020.25	19915	84315
2020 5	16	2020.333	17322	123090
2020 6	17	2020.417	25185	130130
2020 7	18	2020.5	36604	118758
2020 8	19	2020.583	48053	104463
2020 9	20	2020.667	57908	109583
2020 10	21	2020.75	74329	110640
2020 11	22	2020.833	62844	132292
2020 12	23	2020.917	58882	137929
2021 1	24	2021	49460	116008
2021 2	25	2021.083	42067	129271
2021 3	26	2021.167	49243	155180
2021 4	27	2021.25	47539	145785
2021 5	28	2021.333	49394	142975
2021 6	29	2021.417	56286	129077
2021 7	30	2021.5	68212	122260
2021 8	31	2021.583	72200	113726

As usual, the last month's data is incomplete so the final row of figures are inaccurate.