

From: [REDACTED]
To: [Manston Airport](#)
Cc: [REDACTED]
Subject: Comparisons between changes in e-commerce and Air Freight mid-2019 to Sept 2021
Date: 21 November 2021 15:40:31
Attachments: [Comparisons between changes in e-commerce and Air Freight mid-2019 to Sept 2021.pdf](#)

Comparisons between changes in e-commerce and Air Freight 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 :

Comparisons between changes in e-commerce and Air Freight mid-2019 to Sept 2021.pdf

The Draft Arup Report reaches erroneous conclusions, on pages 16 and 19, based on their strangely

January 2020 truncated Figure 1, that are at variance with the attached data and graphs.

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]

From the SMAa Committee on behalf of the 3,700 members

Dr Beau Webber (Chairman)

[REDACTED]

Comparisons between changes in e-commerce and Air Freight mid-2019 to Sept 2021.

Summary : The Draft Arup Report reaches erroneous conclusions, on pages 16 and 19, based on their strangely January 2020 truncated Figure 1, that are at variance with the following data and graphs.

[CAA] – Appendix A

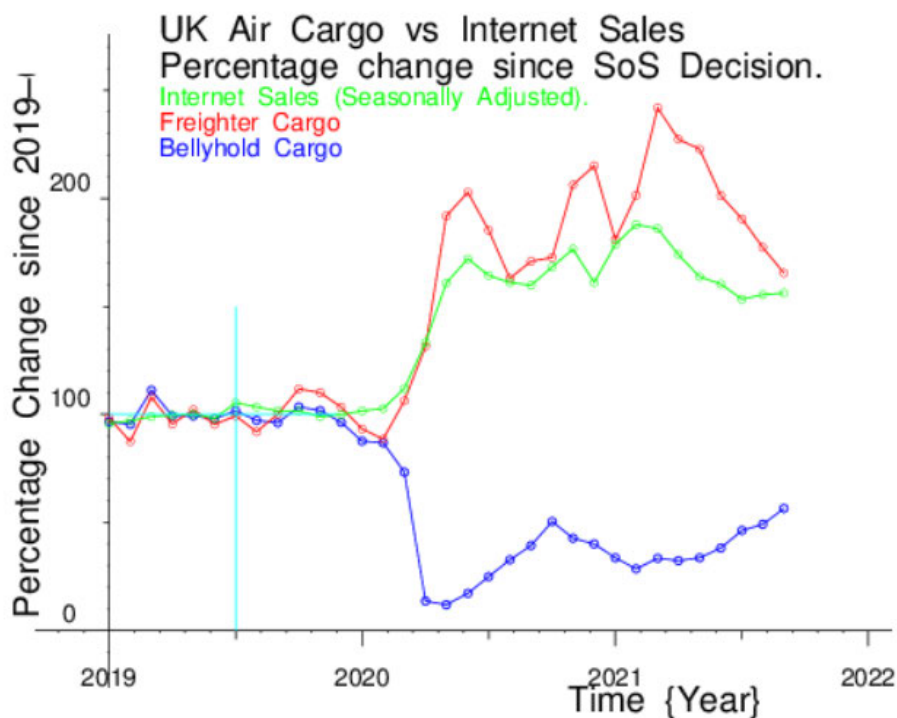
CAA UK Freight Tonnage, for Bellyhold and Freighters :

██████ – Appendix B

Internet Sales £ millions (Seasonally Adjusted)

All sets of figures January 2019 to September 2021 are converted to percentage change since their **average value around the SoS' key July 2019 date**, when their values are changing little : January 2019 to November 2019.

Percentage change UK Air Cargo (Tonnage) and Internet Sales {GBP}



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

The above data is cited in the *SMAa response (Part 1 page 9)* to Arup report and referred to as Graph 2.

We note that the Draft Arup Report reaches erroneous conclusions, on pages 16 and 19, based on their strangely January 2020 truncated Figure 1, that are at variance with the above data and graphs.

- 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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Appendix A :

[CAA]

CAA UK Freight Tonnage, for Bellyhold and Freighters :

<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.

Appendix B :

[ONS]

Office for
National Statistics

Internet Retail Sales

<https://www.ons.gov.uk/businessindustryandtrade/retailindustry/datasets/retailsalesindexinternetsales>

IntValSa [Internet SA]

VALUE SEASONALLY ADJUSTED AVERAGE WEEKLY SALES IN POUNDS MILLION

All retailing excluding automotive fuel - Agg 21X - MZX6

[INTERNET]

INTERNET RETAIL SALES (Non-seasonally adjusted)

JE2J - Average weekly value for Internet retail sales (£ million)

| Year | Month | Years | Internet SA | Internet | Freighter | Internet SA % | Freighter % |
|------|-------|----------|-------------|----------|-----------|---------------|-------------|
| 2019 | Jan | 2019 | 1389.7 | 1278.7 | 63043 | 95.756 | 98.306 |
| | Feb | 2019.083 | 1407.6 | 1243.2 | 56047 | 96.99 | 87.397 |
| | Mar | 2019.167 | 1435.6 | 1345.2 | 69280 | 98.919 | 108.032 |
| | Apr | 2019.25 | 1442.8 | 1348.1 | 61279 | 99.415 | 95.556 |
| | May | 2019.333 | 1451.6 | 1378.3 | 65507 | 100.021 | 102.149 |
| | Jun | 2019.417 | 1423.7 | 1353.8 | 61117 | 98.099 | 95.303 |
| | Jul | 2019.5 | 1529.8 | 1423.8 | 63704 | 105.41 | 99.337 |
| | Aug | 2019.583 | 1500.4 | 1331 | 58947 | 103.384 | 91.919 |
| | Sep | 2019.667 | 1473.6 | 1321.8 | 64211 | 101.537 | 100.128 |
| | Oct | 2019.75 | 1473.9 | 1450.4 | 71662 | 101.558 | 111.746 |
| | Nov | 2019.833 | 1435.5 | 1809.4 | 70623 | 98.912 | 110.126 |
| | Dec | 2019.917 | 1449 | 2077.4 | 66226 | 99.842 | 103.27 |
| 2020 | Jan | 2020 | 1475.2 | 1388.6 | 59826 | 101.647 | 93.29 |
| | Feb | 2020.083 | 1491.8 | 1324.1 | 56801 | 102.791 | 88.573 |
| | Mar | 2020.167 | 1625.8 | 1528.3 | 68210 | 112.024 | 106.364 |
| | Apr | 2020.25 | 1935.7 | 1809.4 | 84315 | 133.378 | 131.477 |
| | May | 2020.333 | 2335.9 | 2199.1 | 123090 | 160.953 | 191.941 |
| | Jun | 2020.417 | 2497.7 | 2358 | 130130 | 172.102 | 202.919 |
| | Jul | 2020.5 | 2385.3 | 2215.1 | 118758 | 164.357 | 185.186 |
| | Aug | 2020.583 | 2336.9 | 2065 | 104463 | 161.022 | 162.895 |
| | Sep | 2020.667 | 2318.8 | 2058 | 109583 | 159.775 | 170.879 |
| | Oct | 2020.75 | 2443.2 | 2384.4 | 110640 | 168.347 | 172.527 |
| | Nov | 2020.833 | 2562.5 | 3332.3 | 132292 | 176.567 | 206.29 |
| | Dec | 2020.917 | 2338.4 | 3008.1 | 137929 | 161.126 | 215.08 |
| 2021 | Jan | 2021 | 2593.6 | 2480.9 | 116008 | 178.71 | 180.898 |
| | Feb | 2021.083 | 2726.6 | 2440.6 | 129271 | 187.874 | 201.579 |
| | Mar | 2021.167 | 2699.5 | 2549 | 155180 | 186.007 | 241.981 |
| | Apr | 2021.25 | 2525.1 | 2359.1 | 145785 | 173.99 | 227.331 |
| | May | 2021.333 | 2376.3 | 2232.2 | 142975 | 163.737 | 222.949 |

| | | | | | | |
|-----|----------|--------|--------|--------|---------|---------|
| Jun | 2021.417 | 2326.5 | 2198.5 | 129077 | 160.306 | 201.277 |
| Jul | 2021.5 | 2225.3 | 2065.4 | 122260 | 153.332 | 190.647 |
| Aug | 2021.583 | 2255.2 | 1988.9 | 113726 | 155.393 | 177.339 |
| Sep | 2021.667 | 2265.5 | 1999 | 106085 | 156.102 | 165.424 |