

To: Secretary of State for Transport
% Planning Inspectorate,
National Infrastructure Planning

Date: 22 November 2021

Our Ref: SoS/R/027

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For the attention of the Manston Airport Case Team

- A. This submission is in response to the SoSFT's letter of 21 October 2021 and specifically paragraph 6.
- B. We submit our comment to the First Round of Consultation herewith as a formal consultation response to the Second Round of Consultation.
- C. Our comment is in response to the submission said to be from the Kent Chapter of the SouthEast Region of the Chartered Institute of Logistics and Transport ("KentCILT") [[TR020002-005706](#)]. The submission has no Chartered Institute of Logistics and Transport¹ letterhead, no contact name or contact address.
- D. A search of the Applicant's Consultation Report [[TR020002-002449](#)] and a search of the Manston Airport Examination Library [[TR020002-002558](#)] makes no mention of KentCILT or the South Eastern Chartered Institute of Logistics and Transport or even the Chartered Institute of Logistics and Transport.
- E. There are two submissions by one individual who states their professional Chartered Institute of Logistics and Transport qualifications for example Mark Heverin MCILT² who concludes that the Secretary of State should reject the

¹  (accessed 22 November 2021)

²

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005506-Mark%20Heverin.pdf> (accessed 22 November 2021)

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005265-Mark%20Heverin%20DfT%20Manston%20ltr%204.pdf> (accessed 22 November 2021)

development application in the likely absence of any credible evidence as to the actual need for such a development.

- F. The submission states at Paragraph 2 of KentCILT [\[TR020002-005706\]](#) that it is from the Kent member group only.
- G. There are 7 members of the Kent Group³.
- H. At paragraph 3 of KentCILT [\[TR020002-005706\]](#) there are a number of statements that presumably come from the Applicant. It is of note that the Applicant gave one presentation to KentCILT and that presentation took place on 8 September 2020⁴.
- I. The presentation is available online (labelled as the “**T Freudmann Presentation**”)⁵ and makes a number of inaccurate statements and perhaps wilful misrepresentation .

For example:

- a. T Freudmann Presentation quotes the Secretary of State’s Decision Letter as you will be aware now quashed.
- b. T Freudmann Presentation says that the Proposed Development will be ready to open in early 2023 despite having no no planning permission, no aerodrome certification⁶ and no airspace.
- c. As you will be aware, since the ExA Recommendation Report the Applicant’s Airspace Change Proposal (“**ACP**”) - a seven step process - has not progressed past Step 2 with the Civil Aviation Authority (“**CAA**”) concluding on two separate occasions: 1 April 2021 and 20 August 2021⁷ that:

“The CAA has completed the Develop and Assess Gateway Assessment and is not satisfied that the change sponsor has met the requirements of the Process up to this point. The CAA does not approve progress to the next Step”.

_____ accessed 22 November 2021)
(accessed 22 November 2021)
(accessed 22 November 2021)

(Accessed on 22 November 2021)

⁷ Available online at: _____ (Accessed on 22 November 2021)

Since the close of the Examination the timeline for Step 2 of the ACP (a seven step process) and the target AIRAC has slipped 7 times without progression with the CAA concluding in October 2021 that the full indicative timeline for this ACP cannot be confirmed⁸.

Date of Indicative Timeline Update	Indicative Timeline for Step 2	Target AIRAC
12 September 2019	26 June 2020	August 2022
8 April 2020	26 February 2021	August 2022
28 May 2020	25 June 2021	March 2023
29 October 2020	29 January 2021	April 2023
19 November 2020	26 March 2021	April 2023
20 April 2021	30 July 2021	August 2023
18 October 2021	29 April 2022	<i>"Until iteration two of the airspace change masterplan including the associated programme plan has been assessed and accepted by the CAA and Department for Transport as co-sponsors of airspace modernisation, the full indicative timeline for this ACP cannot be confirmed. The Define and/or Develop & Assess Gateway(s) above are subject to change⁹".</i>

⁸ Available online at: [REDACTED] (Accessed on 22 November 2021)

⁹ Available online at: [REDACTED] (Accessed on 22 November 2021) specifically the Indicative Timeline Update October 2021 added 20 October 2021.

- d. T Freudmann Presentation says that it is the only “*air freight hub for London and South East*”; however, London Heathrow airport (which handles 500,000 tonnes of Cargo every year¹⁰); London Stansted Airport (the UK's 3rd largest cargo airport¹¹); Luton London Airport (which handles 28,000 tonnes of cargo a year¹²); London Southend Airport (announced a new partnership with a major worldwide logistics operator (Amazon)¹³); and London Gatwick (currently at 150,000 tonnes a year with plans to double it to 350,000 tonnes a year with the use of the Northern Runway¹⁴) are all in London and the South East.
 - e. T Freudmann Presentation says that “Manston today includes a “*fully operational fuel farm*”; however, the fuel farm is not yet in existence and once built will still rely on fuel being transported by HGVs/ fuel tankers as the Proposed Development is not on a fuel pipeline unlike other airports¹⁵.
 - f. T Freudmann Presentation says that “*there is an urgent need for freight capacity in London and South East England that only Manston can fulfil*”; however, the Airport Commission Interim Report (The Air Freight Industry in the UK (PwC 2013)¹⁶; Airport National Policy Statement; and the ExA Recommendation Report all disagree.
 - g. T Freudmann Presentation makes a number of dubious claims that are at best a misrepresentation of industry data eg: Steer Report or worse a wilful misrepresentation.
- J. Some if not all of the conclusions reached at Paragraphs 2 and 3 by KentCILT are therefore through no fault of their own based on inaccurate and false information.
- K. Some of the issues for consideration raised at Paragraph 4(1) by KentCILT have

¹⁰ [REDACTED] (accessed 22 November 2021)

¹¹ [REDACTED] (accessed 21 November 2021)

¹² [REDACTED] (accessed 21 November 2021)

¹³ *Ibid*

¹⁴ [REDACTED] (accessed 21 November 2021)

¹⁵ [REDACTED] (accessed 21 November 2021)

¹⁶ [TR 020002-003885] (accessed 21 November 2021) and [TR020002-003979] (accessed 21 November 2021)

been addressed in our submission of SoS/R/012 to the 2nd Consultation and we will not repeat them here save to say there is no rail freight access, nor waterway access; no logic to slow water freight to the air freight customer, and as you will be aware Kent County Council has raised a large number of highway concerns.

- L. We respectfully would say that the reason why proximity to Europe was important in the War was for emergency landings¹⁷.

¹⁷

[REDACTED] (accessed 21 November 2021) and
[REDACTED] (accessed 21 November 2021)