

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

Date: 24 November 2021

Our Ref: SoS/R/033

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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 Adrian Hilton [[TR020002-005558](#)], Andrew Hurst [[TR020002-005641](#)], Anthony Colin [[TR020002-005789](#)], Antoinette Girdler [[TR020002-005739](#)] (together the "**A Submissions**") in which reference is made of saving truck emissions .
- D. We respectfully remind the A Submissions that the **only** way freight can get to and from the Proposed Development is by truck and by road. This also applies to fuel because the Proposed Development is not on a fuel pipeline¹ and therefore fuel must be carried on tankers.

No Direct Rail Connection and No Railway Station

- E. As you will be aware the potential for a direct rail connection and railway station at the Proposed Development site was investigated and rejected². As the delivery

¹ [REDACTED] (accessed 24 November 2021)

² Page 10 Thanet Parkway Railway Station Alternative Options Analysis Report July 2014 Available online at:

[REDACTED] accessed 24 November 2021)

of a railway station at the Proposed Development site would require a new railway line to be constructed off the existing railway line. The poor feasibility of this work and the potential cost of the scheme led to this option being ruled out³.

- F. The Proposed Development site's runway also presents a physical barrier to having a direct rail line to the Terminal building. The railway line would either need to be delivered around the runway or tunnelled under the runway at an unaffordable cost⁴.

No Rail Freight Routes

- G. In our submission to the 1st round Consultation at [\[SoS/R/006\]](#) specifically at paragraphs 11-16 we evidence that the Proposed Development is not near a Strategic rail Freight Interchange ("SRFI"), there are no plans to develop a SRFI within the 30 year lifespan of the Transport strategy for the South East⁵ or the 10 year lifespan of the Kent Rail Strategy⁶ near the Proposed Development. Further, we provided evidence the location of rail freight routes in East Kent⁷ (the area the Proposed Development is located) which are nowhere near the Proposed Development.

No Rail Freight Station

- H. In our submission to the 2nd round Consultation known as SoS/R/012 specifically Pages 21-25 Paragraphs W and X we evidence that the station known as Thanet Parkway Train Station is a passenger station and cannot be used for rail freight.

³ Page 10 Thanet Parkway Railway Station Alternative Options Analysis Report July 2014 Available online at:

[REDACTED] (accessed 24 November 2021)

⁴ [REDACTED]

⁵ Transport for South East, Transport Strategy for the South East, June 2020. Available online at:

[REDACTED]
(accessed 24 November 2021)

⁶ [REDACTED] (accessed 24 November 2021)

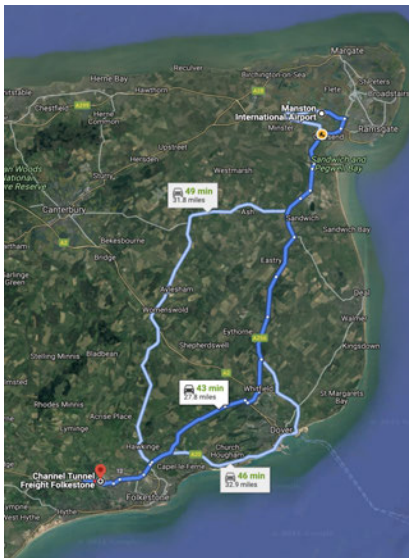
⁷ *Ibid*

Only Trucks

- I. Therefore we can only conclude that the **only** way freight can get to and from the Proposed Development is by truck and by road. This also applies to fuel because the Proposed Development is not on a fuel pipeline⁸ and therefore must be carried on tankers.

Rail Freight Through the Channel Tunnel

- J. On 18 September 2021, a new cross-Channel rail freight service opened to all transporters, using an unaccompanied mode through the Channel Tunnel. The crossing is managed by Eurotunnel Le Shuttle Freight and operates 24 hours a day and six days per week. Departures are from the Group's two terminals in Calais or Folkestone. The capacity will be 8,300 trailers per year. The Eurotunnel Border Pass allows transporters to speed up the border crossing by digitising their administrative exchanges with the border authorities⁹.
- K. The Channel Tunnel Freight Folkestone is some distance from the Proposed Development as shown below; however, the Eurotunnel Rail Freight services Kent, South East and the rest of England.



- L. The new cross-Channel rail freight service is also not impacted by a shortage or otherwise of HGV drivers as it is unaccompanied.
- M. This new rail service, which will emit 40 times less CO2 than ferries, will enable customers to decarbonize their logistic chain by choosing rail. The modal shift also contributes to the French government's objectives of doubling the share of rail in freight transport by 2030 and to UK government plans to decarbonize freight set out in the Green Industrial Revolution plan¹⁰.

Cross-Channel Tunnel by Train Only Way to Save Emissions

- N. The new cross-Channel rail freight service by Eurotunnel Le Shuttle Freight is therefore the **only option** to saving truck emissions and should be supported by the Secretary of State in line with the statutory duty set out in The Williams-Shapps Plan for Rail to promote rail freight to secure economic, environmental and social benefits to the nation.

¹⁰