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.
Following
the Publication of the Independent Assessor's Draft Report and the publication , in July of "Decarbonising transport: a better, greener Britain" and the "Jet Zero consultation: a consultation in our strategy for net zero aviation." The Secretary of State invites comments from the Applicant and any Interested Party on whether this results in any change in whether the Development would be consistent with the requirements of national policies.

I wish I had a pound for every word written on Manston airport over the years. I would be comfortably in the multi-millionaire bracket! I cannot think of any other relatively minor local development issue that has generated such heated debate, actively involved thousands of people spending masses of time writing and speaking, and producing mountains of paperwork. All this going on without a crumb of interest from the nation at large.

The key issue regarding the viability of Manston to operate as a large cargo airport is a simple one to answer on two fronts. Firstly, The IA concluded there was no **need** for a new freight airport at Manston. A conclusion that had already been reached, after a comprehensive and thorough examination of the needs case, by the Planning Inspectorate.
As regards changes of circumstance since July 2019 the IA has consistently found RSP's arguments that:

- A growing e-commerce activity would create a demand for additional runway capacity (for dedicated freighters in the South-East
- (Covid 19 Impact) Applicant's comments on increase of dedicated freighter use during the pandemic.
- Applicant's argument on the shift to narrow bodied aircraft would reduce capacity of belly-hold freight
- Applicant's Post-Brexit Trade argument that it would generate a shift to long distance trade and therefore increase demand for air freight
- Applicant's assertion of a lack of capacity at Heathrow, EMA and Stansted

do not stand up under rigorous examination and therefore no material change has occurred since July 2019, to alter the lack of needs case.

Secondly, regarding the Locational Requirements for Air Freight. The Applicant's key argument is that "demand for air freight services has been strongest in London and the SE." As a result, "new runway capacity should be located in south-east, with Manston ideally situated." IA concluded that RSP wrongly interpreted data to support their argument. I am not at all surprised to hear of mis-use of data by the Applicant as their own reports are full of statistical inaccuracies.(eg. In their air cargo demand forecasts they ignored the proven impact of GDP on freight demand. And they have persisted in maintaining that Ramsgate is 4Km from the runway whereas the Nethercourt Estate starts at 1.37Km from the runway. Accurate measurements clearly stated in submissions from Jenny Dawes and NAG). Here RSP are trying to obscure the fact that its three main competitors (there would be others), Heathrow, EMA and Stansted are located more centrally and close to rail and road links serving the whole country. Manston would lose heavily on distribution times and costs due to its isolated position at the extreme eastern end of Kent.

In concluding on the Needs Case for Development the IA says "that there have not been any significant or material changes to policy or the quantitative need case for the proposed development since July 2019 that would lead to different conclusions being reached (compared with previous ExA

conclusions) with respect to the need for the Manston development." A deduction I am in complete agreement with.

In relation to the publication: Decarbonising Transport: A Better, Greener Britain," and the "Jet Zero consultation: a consultation in our strategy for net zero aviation," although they contain some laudable aims to help restrict its emissions, the objective of the aviation industry is to have business as usual and have no impediments to global aviation travel. The sector states," Our ambition is to decarbonize aviation in a way that preserves the benefits of air travel." Flight Free maintains that, "preserving benefits" means a continuing upward trajectory that aviation has followed in the last 30 years."

SAF's-

In an article in the Financial Times about SAF's it says, "well over 4000 times the current global output is needed, amounting to 450 billion litres by 2050, which is well beyond its production capacity." It continues," airlines face a long haul to reach a sustainable fuel goal. The SAF's that form the core of its strategy (pledged to reach net zero by 2050) is currently scarce. The cost is multiples of petroleum-based jet fuel. They are made typically from plant-based biofuels or waste oil. Production of the former leads to deforestation. The latter, usually used cooking oil, is nearly all used by the road fleet. "Free Flight" states an optimistic 5.5% of jet fuel will be SAF's by 2030.

Efficiency Gains-

The use of lighter materials and more efficient engines could mean a lowering of 36% in emissions by 2050 but an increase in demand could seriously erode those gains.

New Technology-

Electric flight is soon a possibility for smaller aircraft in a domestic setting but it will never be an option for medium, and certainly for long-haul flying.

Offsetting-

This is the DfT's most beguiling plan, to lull us all into a false sense of security. (We have already been offsetting for decades in leaving countries like China to manufacture goods for us, moving our carbon footprint to the other side of the world). "Most dangerously of all offsets make us believe we can reach net zero if we just pay for it, whether it is paying huge sums to capture and store carbon or planting trees." (Flight Free). The greatest danger of the net zero philosophy is the delusion that it leads us to believe our emissions don't count, and we can continue our polluting behaviour.

According to Matt Mace of edie.net. "It has its place. It creates invaluable benefits for communities and helps to restore nature and battle ecological ruin. But the carbon credits market is still a bit of a "wild west" where land is becoming a hot commodity. We can't afford to reach a destination where land is stretched too far to provide sustainable food sources while also enabling businesses to pretend they've tackled the climate crisis by moving the problem elsewhere."

The Climate Change Committee in its recommendations for the 6th Carbon Budget (2033-2037) requires a pathway to a 78% reduction in UK emissions between 1990-2035. In Liz Green's submission, "Manston 's potential 1.9% share of UK's aviation target by 2050 is implicitly already allocated to other airports, many of which have existing planning consents or unused capacity. In these circumstances allocation to an unproven venture such as Manston is unjustified."

The Manston development would form part of allowing aviation emissions to increase into the mid 2030's, which is completely at odds with the governments new target of a 78% cut to UK CO2 by 2035. There is no guarantee that proposed mitigation measures mentioned earlier will result in expected emissions reduction.

In the Climate Change Committee Recommendations to DfT - June 2021, under aviation, it states, "There should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory." And it continues, "Use aviation tax reform to address the imbalance between aviation and surface transport. Encouraging low carbon alternatives (eg rail) for journeys where one exists." And on the pandemic innovation suggests, "replace business travel with online networking." It is worth mentioning a report in a national daily newspaper on travelling to COP 26 from London to Glasgow, flying there was one third cheaper than rail, but produces 5 times more carbon per person than rail. The travel times are similar when factoring in transfers and security queues.

COP26's aviation report has set a goal for net-zero aviation emissions by 2050 (and is relevant to Manston's passenger flight ambitions to European destinations). However, two of the largest aviation emitters, China and India, were not even present. Gareth Davies, the Director General of UK's DfT said that, "only through the introduction of radical, disruptive technology will we be able to decarbonize aviation." None of that technology is up and running and some of it remains speculative. IATA's plan for net zero relies on 3% growth a year from 2019-2050. Andrew Murphy, the EU Transport and Aviation Director says, "IATA's goal is unrealistic because there is no leeway if its 3% growth forecast is not met. Brad Shallot, of the WWF, and director of carbon market governance and aviation was facing the "elephant in the room" head on, stating, "we need to find ways to reduce overall demand for aviation…. Which I know is not popular among airlines." He was referring to IEA's analysis that air travel will have to be trimmed to meet the 1.5C climate goal. Moreover, Christina Temenos, a lecturer in Human Geography at the University of Manchester, explains that, "The DfT is overly optimistic, gambling on future technologies to avoid fundamental changes to our life styles today." She also mentions transport inequalities as just 15% of air travellers cause 75% of the aviation emissions- "the high-emitting practices of an elite few." The UK Citizens Assembly on Climate Change suggested a frequent flyer levy to shift the burden on those that fly the most. And yet in the Chancellor's budget, a few days before COP 26, there was the bizarre announcement of a reduction in Air Passenger Duty for domestic flights in the UK. Here was a government minister encouraging the most polluting form of travel to get around Britain in preference to rail, already more expensive, but much more environmentally-friendly. In addition, he was freezing APD for destinations up to 5,500 miles! This would increase demand for the majority of world destinations, including, USA, Canada, India and China. The increase in APD for journeys longer than 5,500 miles would only affect a small minority of air travellers. Was this not the wrong message to send out to the COP26 multitude and the world?

In the International Aviation Climate Ambition Coalition (ICAC) Declaration Grant Shapps' statement says, "I'm proud to be uniting world leaders to tackle climate change, creating new opportunities for clean growth, green jobs and improved air quality right across the globe." Firstly, Grant Shapps would be hard pressed to unite world leaders as it did not include five of the top ten countries contributing to passenger CO2 emissions (China, India, Germany, UAE, Australia) representing 40% of emitters, and who had not signed the ICAC declaration. Secondly, none of the commitments made by ICAC include reducing air travel- the only way to guarantee a fall in aviation emissions. Thirdly, in referring to "creating new opportunities for ….improved air quality." Tell that to the residents of Ramsgate and nearby villages whose air quality would be increasingly more polluted by over-flying cargo planes as well as increased air pollution during the building phase and increased road traffic, some of it diesel-driven (no fuel storage facilities at Manston). Doug Parr, chief scientist for Greenpeace, summed up the disappointment of COP 26 when he said, "ICAC schemes on SAF's, offsetting, future aircraft designs" (these figure largely) "but it lacks the one thing that is needed to deliver the goal of limiting temperature rise to 1.5C, which is tangible action to prioritise green travel and reduce flights. At COP the final decision must commit to phase out fossil fuels which means reducing demand for these fuels from industries like aviation. Policymakers and countries should ban short-haul flights wherever a viable alternative already exists and invest in rail to create a transport system that's good for the planet while also being affordable and accessible to all."

In summation, it is blindingly obvious that the proposed Manston development is not compatible with National Policies on the future of UK aviation, nor those relating to aviation's responsibility in preventing runaway climate change and the commitment to a 1.5C global rise in temperature.

RP May
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