

**From:** [REDACTED]  
**To:** [Manston Airport](#)  
**Subject:** Re: Proposed reopening of Manston Airport by Riveroak Strategic Partners (TR020002)  
**Date:** 29 November 2021 13:04:10

---

For the attention of: The Manston Airport Case Team  
[Manstonairport@planninginspectorate.gov.uk](mailto:Manstonairport@planninginspectorate.gov.uk)

Dear Sir/Madam

Re: Proposed reopening of Manston Airport by Riveroak Strategic Partners  
(TR020002)

- I agree with the recommendation in the Examining Authority's Report of 18 October 2019 that the DCO should **NOT** be granted.
- I also agree with the draft report of the Independent Assessor of 21 October 2021 that similarly concludes that there have **NOT** been any significant or material changes to policy or the quantitative need case for the proposed development since July 2019.

Put simply, there is no need for this Cargo Hub.

If the development consent order is approved and the project goes ahead it will inevitably fail, simply because there is no evidence of market need.

It was made clear at the first public consultation with the planning inspectorate that the role of the Nationally Significant Infrastructure Project (NSIP) system is to deliver national infrastructure and should the DCO be granted it would be based on a wide-ranging process with a very specific assessment of need.

Obviously, one would expect the Manston project to be part of a wider process of delivering nationally significant infrastructure. Unfortunately, there is not one scrap of evidence to suggest that it is connected to a wider sustainable, need based strategy, on the contrary, 16 separate reports (see below) have considered viability and deliverability. Not one argues that Manston is needed.

SIXTEEN AVIATION REPORTS (ALL PROVING CATAGORICALLY THAT THERE IS NO NEED FOR A CARGO HUB AT MANSTON)

2010 BICKERDIKE ALLEN PARTNERS

2011 YORK AVIATION

2011 BICKERDIKE ALLEN PARTNERS

2014 FALCON

2015 KCC

2016 TDC final report for Thanet District Council (TDC) Manston Airport Viability

2016 AVIA SOLUTIONS RiverOak response TDC Manston Airport viability final

2017 AVIA SOLUTIONS local plan representations review final

2017 AVIA SOLUTIONS analysis of report by Azimuth/Northwood on Manston

2017 YORK AVIATION for SHP summary report final

2018 ALTITUDE AVIATION report

2019 ALTITUDE AVIATION report update

2019 DCO Examiners recommending refusal of DCO on many issues including need

2021 YORK AVIATION for Jenny Dawes in redetermination of DCO

2021 ALAN STRATFORD ASSOCIATES for Ramsgate town council

In the most recent Arup Manston Airport Assessor's Report \* (21st Oct 2021) it concluded 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 the previous ExA conclusions) with respect to the need for the Manston development'*.

Time and time again, we learn that there's sufficient capacity at existing airports. There have not been any significant or material changes since July 2019.

### 1. **Transparency and governance**

Tony Freudmann struck off Solicitors' Roll for 27 counts of Misappropriation of Client Funds is still running the project.

### 2. **Climate Change**

Manston in context with climate change policy.

The UK government is still committed to reducing its greenhouse-gas emissions to net zero by 2050.

As part of this promise, the government has a target to cut emissions by 78% by 2035, compared with 1990 levels.

Thanet District Council declared a climate emergency on Thursday 11 July 2019.

As part of this declaration the Council is still resolved to "Do what is within our powers and resources to make Thanet District Council carbon neutral by 2030, taking into account both production and consumption emissions"

### 3. **Local population proximity to the cargo hub**

40,000 plus souls still live at the bottom of the disused runway! (never designed as a runway for a high-capacity cargo hub).

Their lives would be blighted by noise, pollution and the destruction of their town's growing tourist trade, creative industries and homeworking community.

Please note: Nethercourt estate in Ramsgate is approximately 1 mile from the bottom of the runway.

### 4. **Jobs**

The hospitality & tourism industry continue to be big employers in Thanet, specifically in the 18-24 age group.

When Manston failed on the last occasion, it employed less than 150 people. Unemployment has declined in Thanet since that time.

### 5. **Brexit impact**

Airfreight continues to be a niche market fully served by current airports such as Stanstead (still 1/3 underutilised for airfreight) and East Midlands currently with capacity sufficient to cover the level of need and as passenger routes reopen Heathrow will grow the bellyhold offering.

### 6. **Transport**

The main route from Manston to connect to the motorway network is still via the

A299 & M2/A2 to meet the M25 at Dartford. The A299 & M2 are both just 2 lanes and are often congested. The junction with the M25 and the Dartford crossing are regularly at a standstill.

## 7. **Security and defence**

The MOD position has not changed

From 9th July 2021 the MOD says.

*“The approval of this development would appear contrary to the provisions of paragraph 95 of the National Planning Policy Framework (February 2019) which requires that planning decisions ‘promote public safety and take into account wider security and defence requirements by’ ‘ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.’”*

In conclusion,

The recommendation in the Examining Authority’s Report of 18 October 2019 that the DCO should **NOT** be granted should be acted upon immediately.

There have **NOT** been any significant or material changes to policy or the quantitative need case for the proposed development since July 2019.

Therefore, I urge the Secretary of State to finally dismiss the application from RSP.

Yours sincerely,  
Jonathan Bradley

