

The SoS asks for evidence; the Draft Arup Report provides mostly opinions or demonstrably wrong conclusions.

The SoS asks for evidence; the Draft Arup Report provides 47 Opinions, 41 wrong conclusions out of 53, using out of date information 18 times, omits many key factors, and mostly cites reports prepared for opponents of Manston Airport.

Datewise irrelevant	Statement is correct	Statement is incorrect	Statement is opinion	Source is Pro Manston	Source is Anti Manston	Source is impartial
18	12	41	47	8	15	3

Please see the full analysis in spreadsheet : Arup Summary 5.

We note that the Draft Arup Report reaches conclusions on pages : 16, 17, 18, 22, 23, 24, 25, 28, 29, 30, (sometimes more than once per page), that are at variance with the data and graphs in :
Dr. Webber's submission :

"Changes in Bellycargo and Freighter air freight tonnages mid-2019 to Sept 2021."

This is also cited in *"SMAa response to Arup report" (Part-1 page 4)*, and referred to as Graph 1 :

We note further note that the Draft Arup Report also reaches erroneous conclusions on pages 16 and 19, based on their strangely January 2020 truncated Figure 1 (page 19), that are at variance with the data and graphs in :

Dr. Webber's submission :

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

This is also cited in *"SMAa response to Arup report" (Part 1 page 9)* and referred to as Graph 2.

Omitted Key Matters as cited in the SoS' letter :

Originally present just as a section title, and then removed :

1.3 "Section 6 - considers the extent to which the sixth Carbon Budget affects the need case for the Proposed Development."

Needed section 7 :

7. Thanet's Need for Manston Airport

7.1 Deprivation

7.2 Jobs & Apprenticeships

7.3 Training and Education.

Here is robust proof that the "facts" and "conclusions" in the Draft Arup Report are frequently demonstrably wrong, and also omit key points. These must be corrected, which makes Arup's draft conclusions completely untenable and in need of revising.

Finally, why is a discussion regarding "Need" for Manston Airport even required ?

The Applicant owns virtually all the airport, not needing a Compulsory Purchase, so the discussion should be on the balance of benefits for or against re-opening Manston Airport.

Dr. Beau Webber

Chairman, Save Manston Airport association.

Dr. Beau Webber

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Page	Arup Statement	Reference / Citation	Datewise Irrelevant	Statement is correct	Statement is incorrect	Statement is opinion	Source is Pro Manston	Source is Anti Manston	Source is impartial	Justification for Arup Statement Analysis	Evidence
P4	1.3 Structure of this report										
P4	Section 6: considers the extent to which the sixth Carbon Budget affects the need case for the Proposed Development				1					For reasons unknown, Arup first published version of the report had this statement but the report did not actually have this section. In the revised version all reference to the section had been removed. It seems unbelievable that the Arup report did not address Matter 3 from the SoS Statement of Matters.	
P7	2.2 Status of the ExA Report										
P7	The ExA Report provides a robust assessment of the evidence available at the time the Examination was held and the conclusions drawn are considered to be sound. The ExA Report therefore forms the starting point for this Assessor's Report.					1				On the last day of the Examination, the Applicant purchased the airport site and the previous owners, SHP, asked the ExA to withdraw all their representations. However, the ExA decided not to withdraw the representations including those by Louise Congdon (LC) from York Aviation. The Arup report relies heavily on the work by LC and appears to treat it as as if it were a source of objective information, but this is not the case. LC was commissioned by opponents of the proposed development including the previous owners of Manston Airport, and should be subject to critical scrutiny by the writers of the ARUP Report in the same way that other evidence sources have been scrutinised. Unfortunately this was not the case and many of the conclusions drawn by Arup are based on work done by LC which we have shown to be unreliable. This must call into question the conclusions arrived at by Arup.	SMAa Response to Ramsgate Town Council - Report by Peter Forbes of ASA (PF). SMAA Response to Jennifer Dawes Annex 1 - Report by Louise Congdon (LC). SMAa representation to the Secretary of State - Response to Arup Report - part 1
P15	5.2 Changes in Demand for Air Freight										
P15	5.2.1 The impact of e-commerce on demand for Air Freight										
P16	The Applicant, KNMA and Save Manston Airport (SMA) cite International Air Transport Association (IATA) data from April 2021 (see Figures 2 and 3 in the Applicant's representation) showing that air freight, globally and measured in tonne-km, has recovered to pre-Covid-19 levels		0	1	1	1				Although the statement is true it does not reflect subsequent submissions by SMAa as more data became available: There was a doubling of UK air freight tonnage with an ongoing average growth of 30 k. tonnes per year.	SMAa submission 2021-07 : Do we have a new air cargo regime, post Covid, that Manston Airport could help facilitate ? Graph. [CAA] Confirmed 2021 SMAa Graph 1 (Part 1 page 4) [CAA]
P16	The Independent Assessor considers that the extent to which recent trends in e-commerce will persist long-term following the Covid-19 pandemic is not yet clear.				0	1	1			The evidence since mid-2019 shows that following a near doubling step, the new increased e-commerce level has on average been stable for nearly 18 months. CBRE indicate growth in e-commerce "will be a lasting effect" and "over the next five years, globally, 138 million sq. m. of additional e-commerce-dedicated logistics space will be required to support the growth of internet sales worldwide".	https://www.ons.gov.uk/businessindustryandtrade/retailindustry/datasets/retailsalesindexinternetsales SMAa Graph 2 (Part 1 page 9) [ONS] [CAA]. CBRE - Global e-commerce outlook.
P17	Moreover, the reference to movement of freight at night is not helpful to the Applicant's case – proposed night flight restrictions at Manston may limit its ability to serve the e-commerce market		1	0	1	1			0	1) The Applicant's plan is to have sufficient cargo plane stands to handle all the needed cargo in the day-time. 2) A morning landing at Manston will be delivered much earlier than a night landing at EMA.	1) RSP Evidence to ExA. 2) Delivery patterns to Dr. Webber's scientific laboratory in Ramsgate.

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P17	KNMA's representation at section 2.4 quotes May 2021 Civil Aviation Authority (CAA) airport data which reports that the London area airports cargo volumes using cargo aircraft was 16% higher than the equivalent month in 2020, and that EMA cargo volumes were 24% higher. These figures quoted for London Airports are incorrect, with the 16% actually referring to all UK reporting airports15 (London Airports were 9.9% higher in May 2021 compared with May 2020). The Independent Assessor also notes that May 2020 was a particularly low month due to the fall in international trade due to the Covid-19 pandemic. KNMA's representation also states that the requirement for just-in-time deliveries since Brexit and the Covid-19 pandemic is now 'greater' than before July 2019.	CAA	0	1	1	1				KNMA did use in-correct figures so it is right to point that out but Arup totally ignored relevant information supplied by SMAa. Mid-2019 to late 2021 there was a doubling of air freight tonnage with a current growth of 28 k.tons per year.	SMAa Graph 1 (Part 1 page 4) [CAA].Table_15_Freight_by_Aircraft_Configuration.rdl
P18	"Data from the CAA17 shows total air freight volumes grew from 2 million tonnes in 2009 to just over 2.5 million tonnes by 2019, a total growth of 24% or 2.2% per annum on a compound annual growth (CAGR) basis. For reference, volumes declined to 2 million tonnes in 2020."	CAA	1	0	1	1			1	Arup has not considered data from 2019 to 2021 which is the relevant data. Mid-2019 to late 2021 there was a doubling of air freight tonnage with a current growth of 28 k.tons per year.	SMAa Graph 1 (Part 1 page 4) [CAA]
P18	"Note that bellyhold also gained market share over the same time period as illustrated in table 1 below."	CAA	1	0	1	1			1	Arup has not considered data from 2019 to 2021 which is the relevant data. Mid-2019 to late 2021 Bellyhold suffered a major reduction in tonnage to about 1/3, with little sign of recovery yet	
p19	"When airfreight volumes are compared to the increase in e-commerce there does not appear to be any correlation. Figure 1 .." Figure 1: Change in internet retail sales and air freight volumes indexed from 2009 Comparison of change in internet retail sales and air freight volumes - 2009 to end 2019		1	0	1		0	1	0	Arup has not considered data from 2019 to 2021 which is the relevant data. Data mid 2019 to late 2021 shows high correlation between internet retail sales and air freight tonnage, with a near doubling of internet sales and air freight tonnage.	SMAa Graph 2 (Part 1 page 9) [CAA] & [ONS]
P20/ P21	Applicant and SMA suggest Amazon Dartford Customer Fulfilment Centre demonstrates the dominance of the South East for e-commerce retail			0	1	1				Existing Amazon warehouse locations suggest a need for the availability of a major cargo airport close to each, which Applicant and SMAa suggest Manston could help with for Dartford. Amazon are planning to add B2B (business to business). At the moment they are mainly B2C (customer). Their new Dartford depot being near to Manston Airport could be very relevant regarding cargo from abroad.	Gartner: Survey Analysis: Digital Commerce Revenue Skyrockets With B2B Surpassing B2C
P21	"Taking into account the above data and analysis, there is no clear evidence that the recent growth in e-commerce sales has created 'a shift in transportation modes to favour air cargo'."		1	0	1	1				There is clear evidence that post mid-2019 covid and e-commerce sales have created a shift in transportation modes leading to a doubling of air cargo while there has been a crash in bellyhold cargo. Boeing state "The combination of 4.0% annual average RTK growth, in addition to the proven need for dedicated freighter capacity to support our global transportation system, results in the need for a 60% larger fleet during the next two decades".	SMAa Graph 2 (Part 1 page 9) [CAA] & [ONS]. Boeing WACF

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P21	Ramsgate Town Council commissioned aviation consultants Alan Stratford Associates (ASA) to support their representation ²³ . Their submission provides a summary analysis of UK air freight market volumes 2018 to 2020 and for 2021 up to May 2021 (latest available CAA data when the SoM was issued). It notes that there was a significant fall in air freight volumes between 2019 and 2020 (-21%), though the number of CATMs increased as passenger flights (bellyhold capacity) declined due to the Covid-19 pandemic. However, it notes that recently the number of freight flights has started to decline as passenger flights have been reintroduced.	RTC/ASA	1	0	1	0	0	1	0	The paragraph refers mostly to negative connotations 'decrease', 'fall', 'declined'. The ASA analysis uses incorrect data and its conclusions are wrong. Cargo ATMs increased not decreased in May 2021. The conclusions are also at odds with the findings of IATA which showed a strong growth.	SMAa submission "SMAa Response to Ramsgate Town Council (RTC) - Report by Peter Forbes of ASA (PF)
P22 Beau	"the temporary increase in freighter ATMs recorded at Heathrow should not be used as an indication of latent pent-up demand for freighter movements but as temporary direct replacement of lost bellyhold capacity"	York Aviation on behalf of Jennifer Dawes (paragraph 4.18)	1	0	1	1	0	1	0	Mid-2019 to late 2021 there was a doubling of air freight tonnage with a current growth of 28 k. tons per year. Mid-2019 to late 2021 Bellyhold suffered a major reduction in tonnage to about 1/3, with little sign of recovery yet.	SMAa Graph 1 (Part 1 page 4) [CAA]
P22	"as passenger services and bellyhold capacity are reinstated, the need for dedicated freighters, other than for express parcels (integrators) and specialist niche services will fall again"	York Aviation on behalf of Jennifer Dawes (paragraph 4.24)	1	0	1	1	0	1	0	Mid-2019 to late 2021 there was a doubling of UK air freight tonnage with a current growth of 28 k. tons per year. There are clear roles for dedicated freighters and are not just used by intergrators and niche services. Airlines operating freighters generate nearly 90% of industry cargo revenues and there is roughly a 50/50 split between cargo carried by dedicated freighters and cargo carried as bellyhold. Mid-2019 to late 2021 Bellyhold suffered a major reduction in tonnage to about 1/3, with little sign of recovery yet.	SMAa Graph 1 (Part 1 page 4) [CAA. Boeing WACF.]
P22	The 2018 Steer report is cited by SMA in support of the argument that more dedicated freight capacity is needed, however this was produced prior to the ExA Report and considered as part of the Examination.		1	0	1					Arup seem to be very subjective in deciding which information, produced prior to the ExA report, should be considered relevant or not. In addition, SMAa submitted a graph demonstrating a near doubling of Freighter tonnage, with a then current linear growth of about 30 k. tonnes per year.	SMAa Submission 2021-07 : Do we have a new air cargo regime, post Covid, that Manston Airport could help facilitate ? Graph. [CAA] Confirmed 2021-11 SMAa Graph 1 (Part 1 page 4) [CAA]
P22	the Independent Assessor considers that passenger demand and therefore bellyhold capacity is likely to recover as restrictions on international travel are lifted, restoring at least some of this capacity before Manston could be operational again.					1				Averaged over a year freighter tonnage continues to increase. There is currently no indication in a significant recovery in bellyhold cargo. Arup seem to fail to understand the specific role dedicated freighters play and wrongly assume that bellyhold is the answer to everything.	SMAa Graph 1 (Part 1 page 4) [CAA] Boeing WACF
P22, P23	"Although full reinstatement of services is not expected in 2022, most commentators expect, with effective vaccines as we are now seeing, demand and service levels could be reinstated to 2019 values by 2024, accepting that some markets may be slower to recover than others dependent on the success of the vaccine roll out country by country. However, it is clear that any effect that Covid-19 may have had on the availability of bellyhold capacity is expected to have been unwound by the mid-2020s meaning that Manston could not realistically deliver a material uplift in available capacity in time to make any contribution..."	York Aviation on behalf of Jennifer Dawes (paragraph 4.11)				1	0	1	0	Averaged over a year freighter tonnage continues to increase. There is currently no indication in a significant recovery in bellyhold cargo. Arup seem to fail to understand the specific role dedicated freighters play and wrongly assume that bellyhold is the answer to everything.	SMAa Graph 1 (Part 1 page 4) [CAA] Boeing WACF

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P23	total freight tonnage to/from UK airports fell sharply in April 2020, but quickly recovered to levels somewhat below what was seen prior to Covid-19, though with relatively higher proportions of freight carried by freighter aircraft rather than bellyhold.	CAA	1	1	0	0			1 though with 5 times higher proportions of freight carried by freighter aircraft rather than bellyhold.	SMAa Graph 1 (Part 1 page 4) [CAA]
P23	"Covid has demonstrated the resilience of the aviation sector and its ability to make best use of its existing capacity"	Ramsgate Coastal Community Team & Ramsgate Neighbourhood Plan Group (paragraph 2.5).		1	0	1	0	2	0	It is difficult to understand why this statement of opinion was considered relevant by Arup.	
P23	"EMA and Stansted each increased the weight of cargo aircraft freight year on year. Heathrow achieved a remarkable switch by upping cargo aircraft ATMs by over 800% and in doing so to carry over four and a half time the weight of cargo compared to 2019. Overall air cargo capacity was sustained despite the almost total loss of bellyhold during 2020. This remarkable ability to respond so rapidly was only possible because there is the capacity at the airports to deal with the flights, the shift in carrier types as well as handle and despatch the freight on the ground"	Ramsgate Society (Page 9)		1	0	1	0	1	0	It is difficult to understand why this statement of opinion was considered relevant by Arup.	
P23	The lower level of air freight since May 2020 largely corresponds to the lower level of monthly GDP since, suggesting that the decline in overall air freight is explained by the level of economic activity rather than a lack of bellyhold or specialised capacity.		1	1	0	1				Mid-2019 to late 2021 there was a doubling of UK air cargo freight tonnage with a current growth of 28 k. tonnes per year.	SMAa Graph 1 (Part 1 page 4) [CAA]
P24	CAA data 29 shows that UK air freight volumes in the first five months of 2021 have yet to fully recover to pre-Covid-19 levels; this is contrary to the picture presented by the Applicant and others, though as noted their data referred to the global market rather than the UK specifically		0	0	1	1				SMAa provided detailed CAA UK bellyhold and freighter data. For Manston as a cargo airport it is the doubling of freighter tonnage and continual increase in yearly tonnage that is significant, NOT overall UK freight 'volumes'.	SMAa Submission 2021-07 : Do we have a new air cargo regime, post Covid, that Manston Airport could help facilitate ? Graph. [CAA] Confirmed 2021-11 SMAa Graph 1 (Part 1 page 4) [CAA]
P24	It has been suggested by the Applicant that the use of freighters in the absence of bellyhold demonstrates that, given the availability of additional runway capacity in the South East, freight would more readily move in dedicated freighters rather than in bellyhold on passenger flights.			1		0	1	0			
P24	the temporary increase in the use of dedicated freighters at Heathrow does not prove that there is significant pent-up or suppressed demand for dedicated freighter air freight services in the UK (and specifically in the South East of England). There are two main explanatory factors.					1				The data clearly shows that given the opportunity, dedicated freighter use at Heathrow increased by 806% and handled more freighters than East Midlands in that period. There is clearly the demand for these goods in the Southeast and it was preferable to land the goods there rather than at East Midlands and then truck them down to the Southeast.	

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P24	Firstly, the dramatic increase of CATMs at Heathrow probably gives a false picture of the main inland origins and destinations of cargo. The most obvious explanation is that the freight market took the opportunity to operate freighters at Heathrow (in the slots currently vacated by passenger flights) as that is where the land-based handling agents, logistics forwarders and their transit shed facilities are already located i.e. the International Airlines Group World Cargo Centre and the 'horseshoe' air freight village				1	1				It is notable that Arup use the word "probably" and so all that follows is opinion. Arup do not seem to acknowledge that the reason the "land-based handling agents, logistics forwarders and their transit shed facilities" are located where they are is because that is where the demand for these goods is.	
P24	Secondly, this suggestion does not accurately reflect the air freight market in the UK and its economics. Dedicated freighters are only economic when they can operate fully laden. Otherwise, it is more economic to move cargo in the bellies of passenger services on a marginal cost basis. Dedicated freighters are therefore primarily deployed on (and limited to) trade routes where the aircraft can operate fully laden most of the time (certainly on routes between the Far East and Europe or North America).			0	1	1				The term fully laden is misleading. A freighter will carry goods if it is profitable and will charge accordingly. It will not need to be fully laden as stated. In addition Arup fail to understand the key role of dedicated freighters. "There are several key reasons for freighter preference in air cargo flows: 1) Most passenger belly capacity does not serve key cargo trade routes; 2) twin-aisle passenger schedules often do not meet shipper timing needs; 3) freight forwarders prefer palletized capacity, which is not available on single-aisle aircraft; 4) passenger bellies cannot serve hazardous materials and project cargo, a key sector in air cargo flows; and 5) payload-range considerations on passenger airplanes may limit cargo carriage, which decreases the likelihood that cargo will arrive at its destination on time."	Boeing WACF
P24	As runway capacity is available at EMA and Stansted Airports (as concluded previously by the ExA for example at E.R.5.7.28), it is reasonable to expect that dedicated freighters (in the manner proposed for Manston) would already be operating if sufficient cargo was available.		1	0	1	1				At the runway utilisation frequency envisioned for Manston (average every 25 minutes) runway capacity is nearly irrelevant, provided that the runway is there. What is significant is enough cargo stands, cargo sheds and aircraft slots. Manston will provide those – passenger terminal plane stands are of no use. EMA and Stansted have no room to expand and Stansted will not have sufficient capacity in the future to satisfy demand for dedicated freighters.	Applicant's EXA submission. SMAa representation to the Secretary of State - Response to Arup Report - part 1
P24	It is also the case that EMA (and to a lesser extent Stansted) are better located in relation to the main origins and destinations of cargo in the UK (also previously concluded by the ExA for example at E.R.5.6.26 and E.R.5.6.33).			0	1	1				For cargo destined for the South East it is far more sensible to land it at Manston than first fly it up to the Midlands (200 miles) and then truck it back down to Kent, often via Paddock Wood (another 222 miles). This also contradicts their earlier statement that "the freight market took the opportunity to operate freighters at Heathrow (in the slots currently vacated by passenger flights) as that is where the land-based handling agents, logistics forwarders and their transit shed facilities are already located".	
P24	It is therefore down to insufficient 'critical mass' rather than capacity constraints at the airports which (partly) explains the dominance of bellyhold operations into UK airports.			0	1	1				What is significant is enough cargo stands, cargo sheds and aircraft slots. Manston will provide those – passenger terminal plane stands are of no use. EMA and Stansted have no room to expand.	

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P24, 25	Allied to this is the large network of routes (origins and destinations) operated with suitable bellyhold freight aircraft at Heathrow, one of the world's largest international hub airports. This is the other factor explaining the use of bellyhold rather than dedicated freighters. Effectively a much larger range of origins and destinations can be served more economically (conveying smaller consignments) than would be the case with dedicated freighter operations. It is also the case that passenger services will, by their nature, fly to populous destinations, which is also where manufacturing activity tends to be located or cargo consumed (the key origins and demand destinations for air cargo). York Aviation on behalf of Jennifer Dawes has reached similar conclusions to that outlined above.	York Aviation on behalf of Jennifer Dawes	0	0	1	1	0	1	0	CAA tonnage data does not support that this opinion is driving current aviation cargo trends : Mid-2019 to late 2021 there was a doubling of air freight tonnage with a current growth of 28 k.tonnes per year. Mid-2019 to late 2021 Bellyhold suffered a major reduction in tonnage to about 1/3, with little sign of recovery yet.	SMAa Submission 2021-07 : Do we have a new air cargo regime, post Covid, that Manston Airport could help facilitate ? Graph. [CAA] Confirmed 2021-11 SMAa Graph 1 (Part 1 page 4) [CAA]		
P25	The Independent Assessor notes that no forecasts of dedicated freighter use in the UK have been put forward through the SoM consultation.			0	1	1				This statement is incorrect. SMAa submitted a graph with a linear fit to the CAA's most recent year's freighter tonnage, predicting a UK growth of around 30 k.tonnes per year over Manston Airport's first few years of operation, higher than Manston's predicted growing tonnage capacity.	SMAa Submission 2021-07 : Do we have a new air cargo regime, post Covid, that Manston Airport could help facilitate ? Graph. [CAA] Confirmed 2021-11 SMAa Graph 1 (Part 1 page 4) [CAA]		
P25	It is concluded that the increase in dedicated freighter ATMs at Heathrow is a temporary direct replacement of the lost bellyhold capacity. Once the long-haul passenger market starts to recover, it is expected that the market will revert to the use of bellyhold freight capacity for air cargo movements.			0	1	1				CAA tonnage data does not support that this opinion is driving current aviation cargo trends : Mid-2019 to late 2021 there was a doubling of air freight tonnage with a current growth of 28 k.tonnes per year. Mid-2019 to late 2021 Bellyhold suffered a major reduction in tonnage to about 1/3, with little sign of recovery yet.	SMAa Graph 1 (Part 1 page 4) [CAA]		
P25	5.2.3 Shift to Narrow Bodied Aircraft :												
P25	The Independent Assessor agrees that for environmental and cost reasons, many airlines have been slowly retiring older B747s and other four-engined aircraft (with large bellyholds), replacing them with twin-engined planes with a narrower (sleeker) body design.	Applicant		1	0	0		1	0	All the evidence confirms this statement to be true.	SMAa representation to the Secretary of State - Response to Arup Report - part 1		
P25	Overall, while there is a reduction in bellyhold capacity, the Independent Assessor does not consider it to be that significant. The A350-9 and B787 Dreamliner, effectively the main replacement aircraft on long-haul inter-continental routes formerly operated by B747s, only has two fewer LD330 container slots when compared with a B74731.			0	1	1				There were 157 passenger B747s in 2020. If each of those were replaced, as suggested by Arup, by A350-9 or B787 Dreamliners then that would bring about a reduction in bellyhold capacity of over 300 k.tons a year. CAA figures say that in the UK there is currently on average about 650 k.tons bellyhold carried per year; this then is a reduction of 45 %, if current available flights were further all limited by narrow-body planes. This corresponds to a reduction to 20% of mid-2019 yearly bellyhold capacity, using CAA figures.	SMAa representation to the Secretary of State - Response to Arup Report - part 1		
P26	Overall, the Independent Assessor is not of the view that there is likely to be a significant reduction in bellyhold freight capacity (once the passenger market recovers) due to the introduction of modern twin-engined aircraft.			0	1	1				There were 157 passenger B747s in 2020. If each of those were replaced, as suggested by Arup, by A350-9 or B787 Dreamliners then that would bring about a reduction in bellyhold capacity of over 300 k.tons a year. CAA figures say that in the UK there is currently on average about 650 k.tons bellyhold carried per year; this then is a reduction of 45 %, if current available flights were further all limited by narrow-body planes. This corresponds to a reduction to 20% of mid-2019 yearly bellyhold capacity, using CAA figures.	SMAa representation to the Secretary of State - Response to Arup Report - part 1		

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P26	5.2.4 Post-Brexit trade												
P26 / P27	Whilst the overall performance of the economy is and will continue to be a major driver of air freight, the argument that more long-distance trade could lead to increased air freight (as transit by road and sea are less feasible for certain types of cargo) is plausible to the Independent Assessor.	Applicant & others x6		1	0	1			6	0		All the evidence confirms this statement to be true.	
P28	York Aviation on behalf of Jennifer Dawes does, however, provide evidence that some long-distance bellyhold capacity is available. This suggests that there is not a need for further air freight capacity overall – though it does leave open the possibility that increased capacity for specialised air freight will be needed.	York Aviation on behalf of Jennifer Dawes							0	1		Mid-2019 to late 2021 Bellyhold suffered a major reduction in tonnage to about 1/3, with little sign of recovery yet. Arup fail to understand the key role of dedicated freighters. "There are several key reasons for freighter preference in air cargo flows: 1) Most passenger belly capacity does not serve key cargo trade routes; 2) twin-aisle passenger schedules often do not meet shipper timing needs; 3) freight forwarders prefer palletized capacity, which is not available on single-aisle aircraft; 4) passenger bellies cannot serve hazardous materials and project cargo, a key sector in air cargo flows; and 5) payload-range considerations on passenger airplanes may limit cargo carriage, which decreases the likelihood that cargo will arrive at its destination on time."	SMAa Graph 1 (Part 1 page 4) [CAA]. Boeing WACF
P28	Figure 4.5 of their report, replicated as Figure 2. this evidence does demonstrate that long-haul bellyhold capacity is likely to recover to pre-pandemic levels	York Aviation on behalf of Jennifer Dawes		0	1	1			0	1		Figure 4.5 uses incorrect data and the wrong metric so cannot be relied upon. SMAa Figure X shows that Mid-2019 to late 2021 Bellyhold suffered a major reduction in tonnage to about 1/3, with little sign of recovery yet.	SMAa Graph 1 (Part 1 page 4) [CAA] SMAa representation to the Secretary of State - Response to Arup Report - part 1
P29	There is some available capacity for long-haul bellyhold freight, which is expected to increase as passenger demand recovers.	York Aviation on behalf of Jennifer Dawes	1	0	1	1			0	1		There is no evidence supporting this opinion. SMAa Figure X shows that Mid-2019 to late 2021 Bellyhold suffered a major reduction in tonnage to about 1/3, with little sign of recovery yet. Arup fail to understand the key role of dedicated freighters. "There are several key reasons for freighter preference in air cargo flows: 1) Most passenger belly capacity does not serve key cargo trade routes; 2) twin-aisle passenger schedules often do not meet shipper timing needs; 3) freight forwarders prefer palletized capacity, which is not available on single-aisle aircraft; 4) passenger bellies cannot serve hazardous materials and project cargo, a key sector in air cargo flows; and 5) payload-range considerations on passenger airplanes may limit cargo carriage, which decreases the likelihood that cargo will arrive at its destination on time."	SMAa Graph 1 (Part 1 page 4) [CAA] Boeing WACF
P29	5.2.5 Longer-term impacts of GDP on freight demand												
P29	The Department for Transport (DfT) has not updated its air cargo forecasts since 9 July 2019	ASA on behalf of Ramsgate Town Council (page 8).		1	1	1			0	1		Although the statement is true there is plenty of evidence including the CAA which give bellyhold and freighter air cargo figures up to this Summer.	CAA airport data
P30	"IATA has recently described the past year as 'the worst year for air cargo demand since performance monitoring began'	Ramsgate Town Team (paragraph 2.1)		1	0	1			0	1	0	This statement is misleading and is not a true reflection of the situation. IATA : Air Cargo Market Analysis August 2021 : Air cargo demand has stabilized over the past four months at levels well above the pre-pandemic period. Industry-wide cargo tonne-kilometres (CTKs) rose by 7.7% in August 2021 vs. August 2019, which is only modestly slower than in July (8.8%) and well above the long-term monthly average of 4.7%.	[IATA]Air Cargo Market Analysis August 2021

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	"...overall the tonnage flown is down 21% over the figures from 2019	Barry James (page 6)	1	0	1		0	1	0	This statement is misleading and is not a true reflection of the situation. Mid-2019 to late 2021 there was a doubling of air freight tonnage with a current growth of 28 k. tons per year.	SMAa Graph 1 (Part 1 page 4) [CAA]
P31	5.2.6 Specialised air freight as a source of resilience										
P31	The Proposed Development could create dedicated freight capacity which provides a degree of redundancy, mitigating the impact of such events. The Independent Assessor is of the view that, other things being equal, this supports the case for the Proposed Development but is not in itself a decisive factor.					1				Arup use the word "redundancy" rather than the more appropriate word "resilience" which was in their title. Arup seem to underplay the importance of building resilience into the system.	
P32	5.3 Changes in Capacity at Other Airports										
P33	5.3.1 Changes in capacity at Heathrow Airport										
P34	A delay until at least 2030 on the opening of a third runway at Heathrow is, in the view of the Independent Assessors, likely					1				The evidence suggests that the delay in the expansion at Heathrow will be well beyond 2030 and may not happen at all.	SMAa representation to the Secretary of State - Response to Arup Report - part 1
P34	The Independent Assessor concludes that if low overall aviation demand delays Heathrow expansion or stops it altogether, the lack of demand for passenger flights would free up capacity at Heathrow for more dedicated freight flights – this would reduce the potential demand for services at Manston.			1		1				All the evidence indicates that passenger numbers and freight demands will increase. IATA predict passenger numbers to have doubled to 10 billion by 2050. Boeing predict a 60% increase in dedicated freighter numbers in the next 20 years. Why not build the necessary new cargo stands at Manston ?	SMAa representation to the Secretary of State - Response to Arup Report - part 1
P34/ P35	If, however, Heathrow expansion were to be prevented or substantially delayed by non-demand factors – such as successful further legal challenges on environmental or planning grounds – despite a clear need case being demonstrated in future, this would support the need case for the Proposed Development at Manston, as capacity at other airports may not be sufficient to meet the shortfall in air freight capacity this would create.			1		1				This point has been made repeatedly by the applicant and SMAa and is self-evidently true.	
P34/ P35	Although, given the support for Heathrow expansion in the ANPS and the recent Supreme Court decision in favour of expansion, we consider that this outcome is unlikely.					1	1			Arup has totally ignored the evidence. The Manston DCO, which is relatively straightforward in comparison, (not least because the Applicant owns the land), has already taken 3 times longer than it should have done. The Arcadis report commissioned by the CAA indicates in great detail the reasons that there will be significant delays in delivery. The Arup report ignores the fact that significant delays impact significantly on the eventual cost. The Arup report ignores the fact that it is already significantly delayed. The Arup report ignores the fact that Investors are already casting doubt on whether they intend to invest. Arup ignores the possibility that Investors may prefer a cheaper more environmentally friendly option.	SMAa representation to the Secretary of State - Response to Arup Report - part 1
P35	5.3.2 Changes in capacity at Stansted Airport										
P36	There remains significant capacity for dedicated freight movements at Stansted, and an increase in passenger flights will provide further bellyhold capacity.			1		1				This statement is at odds with what they state themselves <i>"this reinforces the view that if Stansted meets or comes to close to meeting its cap on passengers per annum, it will be highly unlikely to also provide increased freight capacity in the long term."</i> Arup also seem to ignore the fact that Stansted is predominately a low cost carrier and handles very little bellyhold cargo. Arup ignore the fact that there are distinct roles for bellyhold and dedicated freighters.	SMAa representation to the Secretary of State - Response to Arup Report - part 1

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P37	5.3.3 Changes in capacity at East Midlands Airport										
P38	The ExA's report concluded that capacity was available at EMA and the SoM representations do not provide any further evidence which conflicts with this position.	ExA	1			1				We do not consider this an either or situation but an opportunity to build resilience into the system, improve competition, and the development would support the government's policy objective to make the UK one of the best-connected countries in the world and for the aviation sector to make a significant contribution to economic growth of the UK	SMAa representation to the Secretary of State - Response to Arup Report - part 1
P38	5.3.4 Other issues										
P38/ P39	the need for light aircraft facilities in East Kent: Fundamentally, the need case for or against the redevelopment and reopening of Manston airport – given the overarching nature of the development – rests on cargo demand				1	1				The Arup report fails to appreciate the vital role General Aviation (GA) plays in the aviation sector. GA contributes £4.8 billion to the UK economy, supports up to 40,000 jobs. The Manston Development with its pilot training, education and training facility, the Maintenance, repair and overhaul facility, the end of life cycle facility will play a vital role in training the pilots and engineers of the future.	SMAa Representation to the SoS - response to Arup - part 4.
P39	5.4 Locational Requirements for Air Freight										
P40	The Independent Assessor does not ... recognise Figure 12 from the Applicant's representation as being an accurate record of international trade by region				1	1				It is hard to understand why Arup decided not to accept data derived from HMRC as being accurate. In their report Arup state "This means, for example, it could lead to imported goods being allocated to one region (where the importer's employees are located), albeit the goods are actually handled in another region by an out-sourced logistics provider." The use of the word "could" shows that the conclusion is only an opinion and is not based on evidence.	
P40	The ExA concluded that EMA (and to a lesser extent Stansted) perform better with respect to the likely origins and destinations of cargo (E.R 5.6.136 and E.R 5.6.137). The new evidence presented in the SoM representations, ... , does not lead the Independent Assessor to reach a different conclusion to that previously set out in the ExA's Report.				1	1				This seems at odds with Arup's own words when trying to explain why there was an 800% increase in CATMs at Heathrow - "The most obvious explanation is that the freight market took the opportunity to operate freighters at Heathrow (in the slots currently vacated by passenger flights) as that is where the land-based handling agents, logistics forwarders and their transit shed facilities are already located." The Southeast is a major driver of demand.	

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P41	6 Conclusions on the Need Case for Development										
P41	Overall, the Independent Assessor 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 that would lead to different conclusions being reached (compared with the previous ExA conclusions) with respect to the need for the Manston development				1	1				We find it unacceptable that the Arup report has not considered the areas of Need that the SoS felt were "important and relevant":1)The Secretary of State disagrees [with the Ex.A] and concludes that there is a clear case of need for the Development which existing airports (Heathrow, Stansted, EMA and others able to handle freight) would not bring about to the same extent or at all. 2) The Secretary of State concludes that significant economic and socio- economic benefits would flow from the Development to Thanet and East Kent as well as more widely including employment creation, education and training, leisure and tourism, benefits to general aviation and regeneration benefits. 3) As a result of the Development, the potential exists for Manston Airport to develop and grow into a transport asset for the UK which would provide a number of significant benefits locally, regionally and nationally, complementary and in addition to those able to be provided by existing airports. 4) Benefits include increased capacity available in North Kent for import and export of freight by air to, from and within the UK including support for high value and time-critical transport of goods, 5) Benefits include increased connectivity to the North Kent area.6) Benefits include enhanced access to markets and to end users. 7) Benefits include the facilitating of inward investment, support for the advanced manufacturing sector in which the UK is looking to build competitive strength.8) Benefits include the provision of a passenger and executive airport in North Kent. 9) The Development would support the government's policy objective to make the UK one of the best-connected countries in the world.	SoS Decision Letter
P41	The changes to policy, notably the withdrawal and reinstatement of the ANPS and adoption of the Thanet Local Plan, do not significantly change the policy context that was in place at the time of the Examination;				1	1				Arup has failed to acknowledge the significance of the MBU and the Stansted Airport Appeal decision which set a legal precedent that airports Making Best Use of existing runways are not required to prove Need. The Arup report has failed to understand the significance of the fact that the Thanet Local Plan has been adopted since the Examination ended and Manston is safeguarded for aviation use.	SMAa representation to the Secretary of State - Response to Arup Report - part 1
P41	The recent growth in e-commerce sales is not driving a demand for additional runway capacity for dedicated air freighters in the South East;				1	1				This is not supported by the evidence presented by the Applicant and SMAa. The Arup report relies heavily on the work by LC and appears to treat it as if it were a source of objective information, but this is not the case. LC was commissioned by opponents of the proposed development including the previous owners of Manston Airport, and should be subject to critical scrutiny by the writers of the ARUP Report in the same way that other evidence sources have been scrutinised. Unfortunately this was not the case and many of the conclusions drawn by Arup are based on work done by LC which we have shown to be unreliable. This must call into question the conclusions arrived at by Arup.	SMAa representation to the Secretary of State - Response to Arup Report - part 1

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P41	Although there have been short term changes in the balance between bellyhold freight and dedicated freighter activity during the Covid-19 pandemic, these changes are not expected to be permanent, notwithstanding growth in e-commerce and changes to the UK's trading patterns post-Brexit				1	1				This is not supported by the evidence presented by the Applicant and SMAa. The Arup report relies heavily on the work by LC and appears to treat it as if it were a source of objective information, but this is not the case. LC was commissioned by opponents of the proposed development including the previous owners of Manston Airport, and should be subject to critical scrutiny by the writers of the ARUP Report in the same way that other evidence sources have been scrutinised. Unfortunately this was not the case and many of the conclusions drawn by Arup are based on work done by LC which we have shown to be unreliable. This must call into question the conclusions arrived at by Arup.	SMAa representation to the Secretary of State - Response to Arup Report - part 1
P41	There is unlikely to be a significant reduction in bellyhold freight capacity (once the passenger market recovers) due to the introduction of narrow-bodied twin-engine aircraft;				1	1				This is not supported by the evidence presented by the Applicant and SMAa.	SMAa representation to the Secretary of State - Response to Arup Report - part 1
P41	Despite the uncertainty concerning the timescale for the Heathrow Airport Third Runway, changes since July 2019 as described do not lead the Independent Assessor to reach a different conclusion on the need case for Manston Airport. East Midlands Airport has sufficient capacity to handle additional dedicated freighter services should the market demand them, while the planning determination at Stansted confirms that significant freight capacity remains available				1	1				This is not supported by the evidence presented by the Applicant and SMAa.	SMAa representation to the Secretary of State - Response to Arup Report - part 1
P41	There is no new evidence to suggest a different conclusion should be drawn in respect of the locational performance of Manston compared to East Midlands Airport, and to a lesser extent Stansted, to that of the ExA Report.				1	1				This is not supported by the evidence presented by the Applicant and SMAa.	SMAa representation to the Secretary of State - Response to Arup Report - part 1