

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

Date: 26 November 2021

Our Ref: SoS/R/023

Email: manstonairport@planninginspectorate.gov.uk

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:
- a. Anthony Nowak [\[TR020002-005604\]](#) and Julian Eagle [\[TR020002-005472\]](#) (together the “**GA Submissions**”); and
 - b. Antoinette Girdler [\[TR020002-005739\]](#) and Bryan Girdler [\[TR020002-005731\]](#) (together the “**Girdler Submissions**”); in which reference is made to flying training; and
 - c. Adrian Hilton [\[TR020002-005558\]](#) and Brendan Martin [\[TR020002-005473\]](#) (together the “**AB Submissions**”); in which reference is made to passenger flights.

A Resilient General Aviation (“GA”) Region

- D. We respectfully remind the GA Submissions and the Secretary of State that there are a number of places that offer GA and/or light aircraft services and facilities specifically in **East Kent** and all within the catchment area of the Proposed Development.

For example:

- i. [REDACTED] in Ashford is said to be the premier general aviation aerodrome in the South East.
- ii. [REDACTED] to the South of Ashford and was given planning permission to extend its runway and build a new terminal. The expansion to date has not gone ahead¹. Further, Lydd Airport is the permanent home of search and rescue helicopters in the south-east².
- iii. A planning application has been made to Dover District Council for a change of use of land to an airfield to include a grass runway, helipad, and erection of 2no. aircraft hangars, flight office and toilets, workshop/plant storage building³. It is perhaps of note that organisations such as The Light Aircraft Association have in writing strongly supported the small grass runway of the Dover Airfield application⁴ and have not done so at all in support of GA at the Proposed Development.

E. We respectfully remind the GA Submissions and the Secretary of State that that there are a number of places that offer GA and/or light aircraft services and facilities in **Kent** and all within the catchment area of the Proposed Development.

For example:

- i. [REDACTED]
- ii. [REDACTED]
- iii. [REDACTED] which also offers Aircraft Maintenance, Repair & Overhaul (MRO) - [REDACTED] - [REDACTED] - [REDACTED] - [REDACTED] - [REDACTED] - [REDACTED] - [REDACTED] - [REDACTED] - [REDACTED] - [REDACTED] - [REDACTED] addition to Training by [REDACTED] endorsed by the

¹ BBC news, (16 May 2014). Expansion of Kent's Lydd Airport to go ahead. Kent Online (26 November 2018). Talks with landowners delay Lydd Airport runway expansion.

² [REDACTED] (accessed 26 November 2021)

³ [REDACTED] (accessed 26 November 2021)

⁴ [REDACTED] (accessed 26 November 2021)

CAA and Cargo services:- [REDACTED] Also, all within the catchment area of the Proposed Development.

- F. We respectfully remind the GA Submissions and the Secretary of State that in the **South East** there are a number of places that offer GA and/or light aircraft services and facilities.
- G. As you will be aware, York Aviation undertook a General Aviation Airfields Study⁵ for the Department for Transport in March this year. The purpose of the analysis was to examine the airfield network's ability to provide access to GA services for the UK population. Hence, the measure that was considered is the proportion of the UK population that is deemed to be within a 'reasonable' distance of a GA airfield of a given category⁶.
- H. The results for each category are shown below⁷:
 - a. Category 1 Airfields Resilience Test

The results of the random resilience test approach for Category 1 airfields are shown in Table 1.2. It shows the percentage of the UK population within 35 miles of a Category 1 airfield⁸

⁵General Aviation Airfields Study, Resilience Tests, York Aviation for Department for Transport: March 2021 Available online at:

[REDACTED] f (accessed 26 November 2021)

⁶ *Ibid*

⁷ Pages 4-8 General Aviation Airfields Study, Resilience Tests, York Aviation for Department for Transport: March 2021 Available online at:

[REDACTED] (accessed 26 November 2021)

⁸ Pages 3-4 General Aviation Airfields Study, Resilience Tests, York Aviation for Department for Transport: March 2021 Available online at:

[REDACTED] (accessed 26 November 2021)

Table 1.2: % of the UK Population within 35 miles of a Category 1 Airfield Resilience Test Results: (Random Approach)

Region	No. Airfields	Base	10%	20%	30%	40%	50%
North East	0	0.3%	0.3%	0.3%	0.3%	0.3%	0.3%
North West	2	48.8%	46.4%	46.4%	46.4%	46.4%	46.4%
Yorkshire & the Humber	1	55.1%	55.1%	55.1%	55.1%	55.1%	55.1%
West Midlands	1	54.7%	54.7%	54.7%	54.7%	54.7%	54.7%
East Midlands	2	77.8%	40.3%	40.3%	40.3%	40.3%	40.3%
East of England	2	54.2%	41.4%	41.4%	41.4%	41.4%	41.4%
London	1	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
South East	4	74.1%	69.2%	69.2%	69.2%	67.8%	67.8%
South West	2	27.9%	18.4%	18.4%	18.4%	18.4%	18.4%
Scotland	7	15.6%	15.5%	2.6%	2.6%	2.0%	1.9%
Wales	2	16.6%	4.6%	4.6%	4.6%	4.6%	4.6%
Northern Ireland	1	2.8%	2.8%	2.8%	2.8%	2.8%	2.8%
United Kingdom	25	53.9%	48.9%	48.6%	46.3%	41.9%	36.0%

b. Category 2 Airfields Resilience Test

The results of the random resilience test approach for Category 2 airfields are shown in Table 1.3. It shows the percentage of the UK population within 35 miles of a Category 2 airfield⁹

Table 1.3: % of the UK Population within 35 miles of a Category 2 Airfield Resilience Test Results (Random Approach)

Region	No. Airfields	Base	10%	20%	30%	40%	50%
North East	1	82.8%	82.8%	82.8%	82.8%	82.8%	82.8%
North West	2	91.1%	71.9%	71.9%	71.9%	71.9%	71.9%
Yorkshire & the Humber	5	78.2%	78.2%	78.2%	76.7%	76.7%	76.0%
West Midlands	8	100.0%	100.0%	99.8%	99.8%	99.8%	94.7%
East Midlands	9	98.8%	98.7%	89.3%	88.2%	84.6%	84.6%
East of England	8	91.4%	91.4%	91.1%	91.1%	91.1%	91.1%
London	1	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
South East	14	95.1%	95.1%	95.1%	95.1%	92.1%	92.1%
South West	5	73.7%	72.6%	72.6%	56.3%	56.3%	50.6%
Scotland	3	33.0%	30.1%	30.1%	30.1%	30.1%	29.2%
Wales	0	16.5%	16.5%	16.5%	16.5%	16.5%	16.5%
Northern Ireland	1	57.0%	57.0%	57.0%	57.0%	57.0%	57.0%
United Kingdom	57	82.2%	81.7%	80.2%	76.3%	73.9%	71.5%

⁹ Page 5 General Aviation Airfields Study, Resilience Tests, York Aviation for Department for Transport: March 2021 Available online at:

(accessed 26 November 2021)

c. Category 3 Airfields Resilience Test

The results of the random resilience test approach for Category 3 airfields are shown in Table 1.4. It shows the percentage of the UK population within 35 miles of a Category 3 airfield¹⁰

Table 1.4: % of the UK Population within 35 miles of a Category 3 Airfield Resilience Test Results (Random Approach)

Region	No. Airfields	Base	10%	20%	30%	40%	50%
North East	2	95.9%	95.2%	95.2%	95.2%	95.2%	95.2%
North West	5	81.5%	80.3%	80.3%	79.1%	79.1%	75.1%
Yorkshire & the Humber	5	65.3%	65.3%	65.3%	65.1%	65.1%	65.0%
West Midlands	2	83.6%	83.6%	83.6%	83.6%	83.6%	83.6%
East Midlands	8	86.4%	86.4%	86.4%	86.4%	86.4%	86.2%
East of England	20	100.0%	100.0%	97.0%	95.7%	95.7%	95.1%
London	0	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
South East	8	100.0%	100.0%	96.2%	96.2%	95.5%	93.5%
South West	8	74.5%	70.2%	66.4%	57.9%	57.9%	54.4%
Scotland	8	82.9%	79.2%	78.5%	45.2%	45.2%	43.6%
Wales	2	51.4%	45.4%	45.4%	45.4%	45.4%	45.4%
Northern Ireland	1	14.3%	14.3%	14.3%	14.3%	14.3%	14.3%
United Kingdom	69	84.7%	83.2%	82.6%	80.5%	80.0%	75.1%

d. Category 4 Airfields Resilience Test

The results of the random resilience test approach for Category 4 airfields are shown in Table 1.5. It shows the percentage of the UK population within 35 miles of a Category 4 airfield¹¹

¹⁰ Page 7 General Aviation Airfields Study, Resilience Tests, York Aviation for Department for Transport: March 2021 Available online at:

[Redacted] (accessed 26 November 2021)

¹¹ Page 7 General Aviation Airfields Study, Resilience Tests, York Aviation for Department for Transport: March 2021 Available online at:

[Redacted] (accessed 26 November 2021)

Table 1.5: % of the UK Population within 35 miles of a Category 4 Airfield Resilience Test Results (Random Approach)

Region	No. Airfields	Base	10%	20%	30%	40%	50%
North East	4	99.8%	99.8%	99.8%	99.8%	99.3%	99.3%
North West	9	99.0%	99.0%	99.0%	99.0%	99.0%	98.7%
Yorkshire & the Humber	17	99.9%	99.9%	99.9%	99.9%	99.7%	99.7%
West Midlands	18	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
East Midlands	30	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
East of England	38	100.0%	100.0%	98.3%	98.3%	98.3%	98.3%
London	2	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
South East	32	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
South West	35	100.0%	100.0%	100.0%	100.0%	100.0%	92.5%
Scotland	42	64.5%	64.3%	64.3%	63.5%	63.4%	61.7%
Wales	11	96.3%	92.5%	92.3%	92.2%	87.4%	87.4%
Northern Ireland	5	60.6%	60.5%	60.5%	57.6%	57.6%	53.3%
United Kingdom	243	95.9%	95.9%	95.8%	95.1%	94.8%	94.5%

I. As you will be aware, York Aviation's General Aviation Airfields Study for the Department for Transport in March this year concluded that:

*"The airfield network resilience testing reveals a number of interesting points. It demonstrates that, in the **main, the GA airfield network is relatively resilient** but there are vulnerabilities. The **concentration of airfields** in the Midlands and **in the Greater South East means that these regions are generally resilient**, but elsewhere the relative scarcity of airfields means that the same is not true¹²"* (bold added for emphasis).

J. The Proposed Development is in the South East, a resilient GA airfield region and in addition there are a number of GA airfields in Kent and specifically East Kent.

Very Good Provision of Flight Training on Offer Already

K. We respectfully remind the Girdler Submissions and the Secretary of State that there are a number of places that offer GA and/or light aircraft flight training in **Kent**.

¹² Page 11 General Aviation Airfields Study, Resilience Tests, York Aviation for Department for Transport: March 2021 Available online at:

[Redacted URL] (accessed 26 November 2021)

For example:

- i. [REDACTED] for [REDACTED]
- ii. [REDACTED] with the flying schools [REDACTED] and [REDACTED].
- iii. [REDACTED] is home to a number of flying clubs: - [REDACTED] and Flying schools : [REDACTED]
[REDACTED]

L. We respectfully remind the Girdler Submissions and the Secretary of State that there are a number of places that offer GA and/or light aircraft flight training specifically in **East Kent**.

For example:

- a. [REDACTED] in Ashford; you can learn to [REDACTED]
- b. [REDACTED] to the South of Ashford; flying schools [REDACTED]; and [REDACTED]
[REDACTED]

M. We respectfully remind the Secretary of State that the Girdler Submissions make assertions about "*flight training*" without supporting evidence.

N. As you will be aware, the Girdler family had a bitter and public fall-out with the last owners of the Manston Airport site. In the end the Girdler family lost their High Court case in a bid to get an injunction against closure¹³.

O. The Girdler Submissions are connected to TG Aviation Limited a company based at, operated from and registered at Lydd Airport¹⁴ in Folkestone and Hythe in East Kent.

Lydd Home to Search and Rescue

P. As of 2016, Lydd Airport is the permanent home of the UK's Coastguard's search and rescue helicopters in the South-East¹⁵.

¹³ [REDACTED]
(accessed 26 November 2021)

¹⁴ [REDACTED] (accessed 30 November 2021)

¹⁵ [REDACTED] accessed 30 November 2021)

No Direct Rail Connection and No Railway Station

- Q. The AB Submissions make reference to either the use of the new Thanet Parkway Train Station as a passenger rail station or that another new passenger station could be built at the Proposed development.

Not Near Thanet Parkway Train Station



- R. As you can see from the map above the Proposed Development is not accessible from and to the area identifying Thanet Parkway [Train Station] by any other means than by car or bus.
- S. The ExA identified in the examination¹⁶ that the distance from or to the Proposed

¹⁶ Para 6.11.417

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf>
(accessed on 12 November 2021)

Development is such that it would require a shuttle bus service from and to Thanet Parkway Train Station or from and to Ramsgate Train Station.

Runway and Costs Barrier to Another Passenger Train Station

- T. As you will be aware the potential for a direct rail connection and railway station at the Proposed Development site was investigated and rejected¹⁷. As the delivery 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 out¹⁸.
- U. 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 cost¹⁹.

Limited Passenger Catchment Area

- V. The Applicant's response at SE1.1 of the examination²⁰ states that:
"There are a wide range of national and international destinations accessible to residents in Thanet via existing airports. Irrespective of the ultimate destinations served by the proposed development, these will not match the range and frequency of destinations served by Gatwick (1.5-hour drive time from Margate), Heathrow (circa 2 hours) and to a lesser extent London City Airport (circa 2 hours). Ebbsfleet international is around a 1-hour drive

¹⁷ Page 10 Thanet Parkway Railway Station Alternative Options Analysis Report July 2014 Available online at:

[redacted] accessed 24 November 2021)

¹⁸ Page 10 Thanet Parkway Railway Station Alternative Options Analysis Report July 2014 Available online at:

[redacted] (accessed 24 November 2021)

¹⁹
²⁰ SE 1.1, Page 371 Applicant's Answers to the First Written Questions Available online at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003366-RiverOak%20Strategic%20Partners%20-%20Response%20to%20the%20Examining%20Authority's%20Written%20Questions.pdf> (accessed 30 November 2021)

time, providing access to mainland Europe via the channel tunnel, whilst cross channel ferry access via Dover is circa 40 minutes”.

- W. Therefore, the catchment area by the Applicant’s own admission and submission in February 2019 was very limited.
- X. When the Elizabeth Line (formerly known as Crossrail 1) eventually opens from Abbey Wood to Central London, a new range of destinations and journey opportunities will be opened up for rail passengers from Kent. A single interchange at Abbey Wood from the North Kent line service will bring passengers direct to the heart of the City and West End, with the Elizabeth Line continuing direct to Heathrow Airport²¹.
- Y. Since the examination, the Kent Rail Strategy 2021 a number of recommendations²² *including but not limited to the following* for passenger services:
 - a. Increase the capacity of HS services at Ebbsfleet, Ashford, Maidstone West, North Kent and East Kent stations with an additional fleet of HS rolling-stock.
 - b. Obtain support from TfSE for new inter-regional service by extending existing GWR Reading – Gatwick service via Redhill to Tonbridge (West Kent) - Ashford (East Kent) - Canterbury West (East Kent).
- Z. Therefore, in the near future, both Heathrow Airport and Gatwick Airport will be even more readily accessible by train to and from Kent. This would further limit the Applicant's already very limited catchment area.

Area has Very Good Domestic and International Connectivity

- AA. The Proposed Development’s catchment area already has good to very good domestic and international connectivity.
- BB. Since the examination, the construction of Thanet Parkway Train Station is well

²¹ Page 21 Kent Rail Strategy 2021 Available online at:

[REDACTED] (accessed 30 November 2021)

²² Page 62 Kent Rail Strategy 2021 Available online at:

[REDACTED] accessed 30 November 2021)

underway and the station is expected to officially open in December 2022²³. It is on the Ashford International to Ramsgate line. This line ends at St Pancras International, a destination station and key London interchange. In addition to the international platforms used by Eurostar with direct to services France, Netherlands and Belgium there are domestic services that run from St Pancras to the whole of England including:

- a. East Midlands Railway to/from the East Midlands and Yorkshire including Corby, Kettering, Leicester, Nottingham, Derby, Chesterfield, Derby, Chesterfield and Sheffield²⁴; as well as the
- b. Thameslink Programme which serves Bedford, Luton, St Albans City, Cambridge, Peterborough in the North and Wimbledon, Sutton, East Croydon, Gatwick Airport and Brighton in the South²⁵; and the
- c. SouthEastern to Kent and the South East, to Faversham, Margate, Ramsgate, Canterbury West, Dover Priory, Folkestone Central, Ashford, Ebbsfleet International and other destinations in Kent²⁶.

CC. Next to St Pancras station is Kings Cross Station. This station hosts services on inter-city routes to the East of England, Yorkshire, North East England and eastern and northern Scotland, connecting to major cities and towns such as Cambridge, Peterborough, Hull, Doncaster, Leeds, Bradford, York, Sunderland, Newcastle, Edinburgh, Glasgow, Aberdeen and Inverness²⁷.

DD. Kings Cross Station shares a London Underground with neighbouring St Pancras station. The Kings' Cross St Pancras underground station is served by more lines than any other station on the London Underground. In 2019, King's Cross St Pancras was the most used station on the system, with 88.27 million passengers entering and exiting the station²⁸. It links 6 underground lines and is

23 [REDACTED] (accessed 30 November 2021)

24 [REDACTED] (accessed 30 November 2021)

25 [REDACTED] (accessed 30 November 2021)

26 [REDACTED] (accessed 30 November 2021)

27 [REDACTED] (accessed 30 November 2021)

28 [REDACTED] (accessed 30 November 2021)

sourced from "[Station Usage Data](#)" (CSV). *Usage Statistics for London Stations, 2018*. [Transport for London](#). 21 August 2019. [Archived](#) from the original on 22 May 2020. Retrieved 27 April 2020.

the best connected interchange on the London Underground network²⁹. All of London's other principal main stations from King's Cross with links to Scotland and Wales as well as England - seven are directly reached by Underground and the remaining three require only one change³⁰. Heathrow Airport is also easily accessed directly via the Underground's Piccadilly Line from St Pancras station.

EE. Therefore as evidenced above the catchment area already has good to very good domestic and international connectivity which will further improve with the opening of the Thanet Parkway Train Station in December 2020 with access to London St Pancras International at under an hour from Thanet³¹.

²⁹ [REDACTED] (accessed 30 November 2021)

³⁰ [REDACTED] (accessed 30 November 2021)

³¹ [REDACTED]
(accessed 30 November 2021)