

# Manston Airport Air Freight Hub

*Reviving strategic transport infrastructure to  
maximise Global Britain's trading potential*

**Applicant's response to  
Arup Assessor's Draft Report**

## **Appendix 1**

**Project:** Manston Airport Development Consent Order  
**Document Ref:** TR020002/RED2/Arup/APP1  
**Redetermination Deadline Date:** 3 December 2021

## **MANSTON AIRPORT PROJECT**

### **PINS REFERENCE TR020002**

#### **ARUP REPORT RESPONSE – APPENDIX 2 – THE PREJUDICIAL NATURE OF THE INDEPENDENT AVIATION ASSESSOR’S DRAFT REPORT**

##### **DOCUMENT TR020002/RED2/Arup/APP2**

- 1.1 The Secretary of State commissioned Arup to act as an independent aviation assessor to review the question of the need for Manston Airport and to publish a report on its findings. This report (the Draft Report), took around six months to write at an apparent cost of £150,000. It was published on the Planning Inspectorate website on 21 October 2021, at which time the Applicant and Interested Parties were invited to provide comments.
- 1.2 The Applicant has numerous concerns in the approach taken with the Draft Report, the evidence (or lack thereof) supporting the Draft Report’s conclusions, and the documents and views taken into consideration despite these having been formally withdrawn by their authors. The report states in section 2.2, page 7 that Arup considered submissions from Stone Hill Park, the previous landowner of the site who withdrew their submissions when the sale of the land completed during examination. We have provided a detailed breakdown of these issues and how such an array of fundamental concerns undermine the validity of the Draft Report. This appendix focuses on the issue of the prejudicial nature of the Draft Report.
- 1.3 The authors of the report are not identified within it or in any published correspondence relating to its commissioning . This runs contrary to established practice in providing expert evidence, namely that the person writing reports must be able to demonstrate relevant expertise. The Applicant, on the other hand, has met these standards. The Applicant provided evidence confirming the qualifications and experience of those involved in drafting its submissions. This is fundamental to the reliability of secondary evidence generally.
- 1.4 In further contrast the Applicant has commissioned a new report, from IBA Global (submitted with document reference **TR020002/RED2/IBA**), an international aviation consultancy with a named author and credentials, which supports the Applicant’s original case.

##### **Anonymity**

- 1.5 In the case of the Draft Report we have no information about the identity and qualification of the authors. There is no way to ascertain if the author drawing conclusions has any relevant experience or education to interpret the primary evidence. Furthermore, the lack of explanation detailing how a conclusion has been reached means it is not possible to review the validity of the basis for these conclusions. This approach is not only contrary to established scientific practice, but directly conflicts with the requirements explicitly set out by an appeal panel of three

inspectors from the Planning Inspectorate in its appeal decision of 26 May 2021 relating to London Stansted Airport<sup>1</sup>.

- 1.6 The inspectors state at paragraph 27 that:

*“The panel was not persuaded that the conclusions in the ES and ESA were incorrect or unreliable. Indeed they **are to be preferred over the evidence of SSE on this matter, which was not prepared by a person qualified or experienced in air traffic forecasting.** Accordingly, the forecasts contained within the ES and ESA are sufficiently robust and the best available in this case”* (emphasis added)

- 1.7 This standard approach to applying weight to evidence that is proportionate to the qualification and experience of the authors is undermined by the failure to advise who the authors are. It is not possible to assess the relevant level of experience other than by reference to other evidence collated by appropriately qualified professionals. As we have demonstrated elsewhere, the evidence from the suitably qualified experts, whether instructed by the Applicant or not, contradicts much of the Draft Report’s conclusions, and tertiary evidence from industry publications further supports the findings of the Applicant’s experts. Reviewed in this context, the failure to publicise the authors appears to be an attempt to obscure their lack of experience, albeit that their naivety is immediately apparent once the Draft Report is reviewed.

#### **Irrelevant commentary**

- 1.8 The Draft Report seems to intentionally disparage the Applicant’s case by adding irrelevant commentary that is misleading as it relates to the historic examination of local planning policy. For example, it fails to accurately reflect that the position is now clear with the Thanet Local Plan having been adopted on 9 July 2020. Arup state, in section 4.3 of the Draft Report, in relation to the Thanet Local Plan that there had been objections associated with certain aspects of the Local Plan. This is both unnecessary commentary and needlessly prejudicial to the Applicant as once the Local Plan is adopted (and it has been for more than 12 months in this case), any previous objections to its adoption are wholly irrelevant. The adopted Local Plan contains explicit support for the reopening of Manston Airport. This is further demonstrated by the extremely supportive consultation response submitted from the leader of Thanet District Council which states (emphasis added):

1.8.1 “..this project will bring to Thanet not only from the inward investment of over £300m to rebuild and create a modern energy efficient airport alongside the aircraft maintenance and repairs but, also the incredible opportunity to provide much needed quality jobs and associated work for our District and the wider east Kent area.”

1.8.2 “..**widely supported by the residents** and have no doubt that this project is **essential for the regeneration** and the overall positive future for Thanet.”

1.8.3 “..main challenge was based on “need” which is rather bemusing as with trade barriers being opened more freely following Brexit which brings with it the **need for**

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<sup>1</sup> Appendix 5.1 – Appeal Decision – London Stansted Airport, Essex – 26 May 2021

**additional cargo capacity, surely it is an essential requirement for the UK to accommodate such trade to enable fast growth in its economic recovery.”**

- 1.8.4 “Thanet has a high level of deprivation which is a result of years of high unemployment and a lack of large private inward investment, **the “need” to reverse this decline is to reopen and develop the airport.** Local people continuously ask “when will Manston airport have passenger services available again and why is such a huge national asset that our district is lucky to have sitting there wasted and unused” all questions that are difficult to answer.”
- 1.9 The Applicant questions why Arup felt it necessary to highlight an outdated position which negatively and incorrectly casts doubt over whether the Thanet Local Plan supports the reopening of Manston airport.

#### **Over-reliance on inappropriate evidence**

- 1.10 Arup repeatedly dismisses the case of the Applicant and relies disproportionately on submissions by third parties. This is done with no explanation as to why evidence opposing the reopening of Manston Airport is more highly valued than the Applicant’s case.
- 1.11 For example, Arup repeatedly relies on submissions made by York Aviation and Nethercourt Action Group, the latter being a campaign group made up of local residents, but fails to explain why they find the argument put forward by them to be more convincing than the Applicant’s scientifically supported position. This is apparent in Section 5.3 of the Draft Report which details “Changes in Capacity at Other Airports”. Nethercourt Action Group’s submission is quoted repeatedly (pages 34, 36 and 38) as evidence for capacity being sufficient. This opinion contradicts that of those within the freight aviation industry. It is readily accepted that freight capacity in the south-east of England is constrained. These airports will continue to prioritise passenger aircraft movements as this will result in greater profits for these airports, and have explicitly made clear that passenger movements are their priority. This position is supported in the report from IBA Global (submitted with document reference TR020002/RED2/IBA), an international aviation consultancy with vast industry experience. In the absence of justification for this approach being set out by Arup, the Applicant considers that the Draft Report, on the face of it, does not adhere to the guidelines outlined in the Stansted decision requiring evidence to be preferred where it has been prepared by a suitably qualified person.
- 1.12 In respect of York Aviation, whilst the Applicant notes that it is an aviation consultant, it was found in the Stansted Public Inquiry, during cross-examination, that Louise Congdon, the managing partner of York Aviation, is not qualified to act as an expert witness in aviation forecasting. The Applicant submits that it would therefore be unwise to place much weight on the findings of York Aviation in respect of forecasting in the freight aviation industry, this being at the heart of the report.
- 1.13 Whilst the Draft Report places excessive weight on evidence from unqualified sources, the authors also appear to question the validity and reliability of the Applicant’s use of industry news to support its position, dismissively referring to it as being ‘drawn from an online article’ (page 16). Where the Applicant has referred to online articles as the source of data, these originate

from the aviation trade press. The nature of these articles is that they have undergone sector-specific review to ensure that they are accurate and reflect the data available at that time.

- 1.14 The failure by Arup to provide any justification for accepting or dismissing the accuracy of a data source is indicative of a failure by Arup to consider the data in detail, a view that is further supported by the fact that the authors have not provided their approach to assessing the data. The Draft Report's conclusions are either assertions that are not evidenced or the unquestioning adoption of opponents' submissions (which are generally not evidenced themselves). The Draft Report fails to recognise that figures made by third parties are demonstrably wrong. Instead, Arup reproduce this in their Draft Report, at page 28, illustrating Arup's inappropriate, over-reliance of opponent's submissions. The Applicant emphasises that any aviation expert would have recognised the error. The Applicant has set out details of this error in Appendix 1, submitted with document reference **TR020002/RED2/Arup/APP1**.
- 1.15 This indicates that proper, independent analysis has not been conducted or the Draft Report was written to reach a pre-specified conclusion. Neither option is sustainable and the Draft Report should be disregarded as being without merit.
- 1.16 The Draft Report repeatedly bemoans the lack of forecasts relating to the future of aviation trade but then reaches conclusions adverse to the Applicant. For example:
- 1.17 *"No forecasts of future e-commerce volume or market share have been put forward through the SoM consultation. The Independent Assessor considers that the extent to which recent trends in e-commerce will persist long-term following the Covid19 pandemic is not yet clear."* (page 16)
- 1.18 This led to Arup making the conclusion that:
- 1.19 *"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'. Consequently, the Independent Assessor does not agree with the Applicant's position that growing e-commerce sales are driving a demand for additional runway capacity (for dedicated freighters in the South East)."* (page 21)
- 1.20 This approach is again seen in Arup's approach to analysing Brexit:
- 1.21 *"The Independent Assessor is not aware of any forecasts of the trade or air freight impact of post-Brexit trade deals more generally – which is unsurprising given the uncertainties outlined above.*
- Therefore, while other things being equal these trade deals can be expected to increase demand for air freight capacity, both specialised and bellyhold, current evidence on the scale of these impacts is limited."* (page 27)
- 1.22 This led to the conclusion that:
- 1.23 *"The long-term impacts of Brexit and the extent to which recent figures have been affected by Covid-19 are unclear. Overall, the Independent Assessor has not seen any evidence – one way or the other – on how changed trading arrangements post Brexit will affect long distance trade*

*or air freight demand. There is some available capacity for long-haul bellyhold freight, which is expected to increase as passenger demand recovers.” (page 29)*

- 1.24 The Draft Report inexplicably focuses on the past. It makes the warrantless assumption that the future of air freight would be similar to the situation ten years before the pandemic, ignoring numerous advances in technology that have fundamentally altered the passenger and freight aviation markets in this period. The Draft Report entirely ignores the rapidly-changing air freight industry, accelerated by the pandemic and interprets data incompatibly with the actual current working practices of the aviation industry.
- 1.25 With every passing day further evidence is published which further strengthens the Applicant's position. Appendix 4 (**TR020002/RED2/Arup/APP4**) provides an array of this evidence in full for ease of reference. These forward-facing industry journals provide the evidence that is severely lacking from the Arup Draft Report, undermines the Draft Report's analysis, and strongly supports the Applicant's position and the original decision of the Secretary of State that development consent should be granted.
- 1.26 The Applicant has carried out an exercise of analysing these articles which comment on future trends of the freight aviation industry. The Applicant has produced an Appendix 3 (document reference **TR020002/RED2/Arup/APP3**), which demonstrates and analyses a sample of the wealth of evidence available in the reputable aviation trade and industry press that supports the need for re-opening Manston Airport. Arup should have undertaken a comparable exercise.
- 1.27 Further, the Applicant has commissioned a new report, from IBA Global (submitted with document reference **TR020002/RED2/IBA**), which also recognises that the freight aviation industry is dynamic. This IBA report, like the Applicant, does not look to the past as an indication to the future.

## **Conclusion**

- 1.28 The Applicant submits that the report should be given little or no weight for the following reasons:
  - 1.28.1 its authors and their qualifications are not identified;
  - 1.28.2 it contains unsupported assertions;
  - 1.28.3 it prejudicially dismisses the Applicant's expert evidence;
  - 1.28.4 when it agrees with the Applicant it gives the relevant issue little weight;
  - 1.28.5 it unquestioningly accepts opponents' unevidenced submissions; and
  - 1.28.6 it bemoans the lack of forecasts but then concludes against the Applicant.

## CAA data errors: Peter Forbes submission

Peter Forbes/Alan Stratford and Associates prepared a submission on behalf of Ramsgate Town Council. There are numerous errors and misinterpretations in this report although this paper focuses only on the inaccurate use of CAA data and its subsequent interpretation.

On the fifth page of the unnumbered report, the following has been submitted:

The lack of passenger flights and consequently cargo bellyhold capacity during the pandemic has, however, resulted in significant growth in dedicated freighter traffic, although as indicated in Tables 3.2 and 3.3 both the volume of cargo handled by dedicated freighters and the number of dedicated freighter ATMs have begun to decline as passenger flights have started to be reintroduced.

**Table 3.2 UK Air Cargo Market by Type – May 2019 – May 2021**

Tonnes Handled	May-19	May-20	May-21
Passenger Bellyhold	146,491	17,322	49,231
Dedicated Freightier	65,507	123,090	115,199
Total	211,999	140,412	164,430

Source: CAA Airport Statistics

**Table 3.3 UK ATMs by Type – May 2019 – May 2021**

Total ATMs	May-19	May-20	May-21
Passenger Aircraft	202,572	10,283	17,000
Dedicated Freightier	4,888	8,263	6,899
Total	207,460	18,546	23,899

Source: CAA Airport Statistics

This data is misleading and erroneous. In stark contrast to Peter Forbes assertion that the volume of cargo handled on freighters and the number of CATMs has declined, there has actually, as the CAA data shows, been an increase. For tonnage carried on dedicated freighters, the increase between 2020 and 2021 is 16%, according to CAA data (see Table 15, as screen shot of which is shown below). Tonnes carried on passenger aircraft increased by 185%. This increase should be set against the 111% increase in ATMs overall, with a 199% increase in passenger aircraft and a 1% increase in freighters.

The tables should read as follows, with serious errors highlighted in yellow:

Tonnes handled	May 2019	May 2020	May 2021
Passenger bellyhold	146,491	17,322	49,394
Dedicated freighter	65,507	123,090	142,975
Total	211,999	140,412	192,369

Source: CAA Airport Data, Table 15

Total ATMs	May 2019	May 2020	May 2021
Passenger aircraft	202,572	10,283	30,710
Dedicated freighter	4,830	8,253	8,335
Total	207,402	18,536	39,045

Source: CAA Airport Data, Table 6



## Screen shot of CAA Airport Data Table 6 for May 2021

	<-----May 2021----->			<-----May 2020----->			<-----Percentage Change----->		
	Total	Passenger Aircraft	Cargo Aircraft	Total	Passenger Aircraft	Cargo Aircraft	Total	Passenger Aircraft	Cargo Aircraft
Other UK Airports									
LANDS END (ST JUST)	537	457	80	128	52	76	320	779	5
LEEDS BRADFORD	130	130	-	1	1	-	12900	12900	..
LERWICK (TINGWALL)	79	79	-	4	4	-	1875	1875	..
LIVERPOOL (JOHN LENNON)	375	374	1	106	106	-	254	253	..
MANCHESTER	1,850	1,702	148	437	365	72	323	366	106
NEWCASTLE	449	418	31	2	2	-	22350	20800	..
NEWQUAY	126	126	-	-	-	-	..	..	..
NORWICH	950	950	-	650	650	-	46	46	..
OXFORD (KIDLINGTON)	1	1	-	-	-	-	..	..	..
PRESTWICK	74	6	68	52	-	52	42	..	31
SCATSTA	-	-	-	213	213	-	..	..	..
SOUTHAMPTON	353	353	-	75	74	1	371	377	..
STORNOWAY	212	210	2	62	61	1	242	244	100
SUMBURGH	654	654	-	107	107	-	511	511	..
TEESSIDE INTERNATIONAL AIRPORT	318	318	-	-	-	-	..	..	..
TIREE	108	107	1	51	30	21	112	257	-95
WICK JOHN O GROATS	-	-	-	1	1	-	..	..	..
Total Other UK Airports	21,563	17,620	3,943	9,497	5,915	3,582	127	198	10
Total All Reporting UK Airports	39,045	30,710	8,335	18,536	10,283	8,253	111	199	1

## Screen shot of CAA Airport Data Table 15 for May 2021

Freight by Aircraft Configuration May 2021 (a)  
Comparison with Previous Year  
Tonnes

Table 15

	<-----Passenger Aircraft----->			<-----Cargo Aircraft----->			<-----Total----->		
	2021	2020	Percentage Change	2021	2020	Percentage Change	2021	2020	Percentage Change
NORWICH	8	22	-64	-	-	-	8	22	-64
PRESTWICK	-	-	-	1 314	1 069	23	1 314	1 069	23
SCATSTA	-	11	-	-	-	-	-	11	-
SOUTHAMPTON	2	2	-	-	-	-	2	2	-
STORNOWAY	12	8	50	-	-	-	12	9	33
SUMBURGH	14	3	367	-	-	-	14	3	367
TIREE	1	-	-	-	-	-	1	-	-
Total Other UK Airports	1 798	963	87	48 382	37 047	31	50 181	38 009	32
Total All Reporting UK Airports	49 394	17 322	185	142 975	123 090	16	192 369	140 412	37
Non UK Reporting Airports									
ALDERNEY	4	4	-	-	1	-	4	4	-
GUERNSEY	5	3	67	59	40	48	63	44	43
ISLE OF MAN	1	10	-90	-	4	-	1	14	-93
JERSEY	2	2	-	82	26	215	85	28	204
Total Non UK Reporting Airports	12	19	-39	141	71	99	153	90	70

(a) Domestic traffic is counted both at the airport of arrival and the airport of departure.  
The total domestic plus international traffic is, therefore, only a measure of airport activity.

It is also interesting to note the change in tonnage on dedicated freighters over the past four years. The following charts show the London area and the overall total for all reporting airports. The London area chart highlights the reliance on the southeast for freight since the pandemic. The chart showing the overall tonnage for freighters shows the extent of the reliance on this form of air transportation and how quickly spare capacity was used, contrasting the stable, constrained, picture prior to the pandemic.



