

Manston Airport – Response to Ove-Arup Report by Cllr David Green  
I am chair of the Finance and General Purposes Committee of Ramsgate Town Council

This submission is in a personal capacity.

Riveroak Strategic Partners (the Applicant) proposes to reopen and develop Manston Airport into a dedicated air freight facility able to handle at least 10,000 Cargo Air Transport Movements (CATM) per year whilst also offering passenger, executive travel, and aircraft engineering services. Manston Airport had previously closed to aircraft on 15 May 2014, before then it serviced a mix of freight, scheduled and charter flights. It has subsequently been utilised as a reserve lorry park as part of Operation Stack and then for Operation Brock as part of the planning for 'in the event of a no deal Brexit'. Manston Airport is in Thanet, Kent and is owned by the Applicant, although there is some doubt over whether ownership is unconditional as the previous owners appear to still have some interest.

The application for the proposed redevelopment of Manston Airport was submitted by the Applicant to the Planning Inspectorate (PINS) on 17 July 2018 under section 37 of the Planning Act 2008. The Application was examined by the Examining Authority (ExA). The Examination commenced on 9 January 2019 and following a series of issue specific and open floor hearings concluded on 9 July 2019. The ExA submitted its report of Findings and Conclusions and Recommendation to the Secretary of State for Transport<sup>1</sup> (ExA Report), to the Department for Transport on 18 October 2019. The ExA's recommendation was as follows: "The Examining Authority recommends that the Secretary of State should not grant development consent. "

**The conditions attached to the granting of a DCO require that the application must be of a size to be nationally significant and must fulfil a need that cannot be supplied by existing facilities.**

The secretary of state for transport decided to grant the DCO against the PINs advice but was forced to withdraw following a Judicial Review financed by residents through crowd funding raising a remarkable £120k. Ramsgate Town Council and several other local organisations and individuals contributed separately directly to the applicant's solicitors

The appeal to the High Court was lodged against the decision to approve the application by local resident Jennifer Dawes.

Ramsgate Town Council (RTC), representing those residents that would suffer the greatest impact from the proposal, contributed its views to the Planning Inspectorate's (PIN's) examination of RSP's bid for a DCO regarding a nationally significant freight hub at Manston.

RTC noted that PINS, as well as rejecting the case for a DCO, supported the view that the plans would have detrimental impacts particularly on Ramsgate and Hern Bay. They questioned RSP's business plan, their lack of identifiable funding and lack of identified airlines or freight businesses.

The Department for Transport consented to the judgment on the basis that the decision letter did not give adequate reasons to enable the reader to understand why the Secretary of State disagreed with the ExA's Report on the issue of need for the Development. Following an Order of the High Court made on 15 February 2021 the decision of the Secretary of State dated 9 July 2020 to grant the application for the Proposed Development was quashed.

The Secretary of State for Transport must now re-determine the Application.

In accordance with rule 20(2) of the Infrastructure Planning (Examination Procedure) Rules 2010 the Secretary of State for Transport invited further representations for the purposes of his re-determination of the Application. The Statement of Matters (SoM) consultation period ran for four weeks from 11 June 2021 until 9 July 2021. The Applicant, interested parties, and other persons were provided the opportunity to make written representations in response to the SoM.

The matters on which further representations were invited were as follows:

- The extent to which current national or local policies (including any changes since 9 July 2020 such as, but not limited to, the re-instatement of the ANPS) inform the level of need for the services that the Development would provide and the benefits that would be achieved from the Development.
- Whether the quantitative need for the Development has been affected by any changes since 9 July 2019, and if so, a description of any such changes and the impacts on the level of need from those changes (such as, but not limited to, changes in demand for air freight, changes of capacity at other airports, locational requirements for air freight and the effects of Brexit and/or Covid).
- The extent to which the Secretary of State should, in his re-determination of the application, have regard to the sixth Carbon Budget (covering the years between 2033 – 2037) which will include emissions from international aviation; and
- Any other matters arising since 9 July 2019 which Interested Parties consider are material for the Secretary of State to consider in his redetermination of the Application.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005841-211020%20FINAL%20-%20Consultation%20Letter%20-%20Second%20Round%20of%20Consultation%20Manston%20Airport%20DCO.pdf>

A team led by Arup and including MDS Transmodal and CEBR has been appointed as an Independent Assessor to consider the need case for the Proposed Development to inform the Secretary of State's decision on this aspect.

**Riveroak Strategic Partnership have responded to the redetermination under the following headings:**

1. The status of need in the decision
2. Current planning policies affecting need including changes since 9 July 2020
3. An update on quantitative need including changes since 9 July 2019
4. A note on the sixth carbon budget
5. A note on the currency of environmental information together with updated information
6. A note on the parcels of land 050b, 19c, and 27

They claim in summary: the case for the project has become stronger since both 9 July 2019 and 9 July 2020: that policy support and the quantitative need for the project have grown as the case for resilient air cargo capacity in the UK that is independent of passenger flights has grown and the prospects of this demand being met at other airports has reduced. Carbon targets are more likely to be met by new state-of-the-art facilities around an existing runway than by forcing existing operational airports to replace theirs.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005769-Applicant's%20Submission%20for%20the%20re-determination%20of%20the%20Manston%20Application.pdf>

**Jenny Dawes has submitted a detailed evidenced submission prepared for her by York Aviation. They consider in detail:**

- Relevant National Policy
- Local Policy and Development
- The Quantified need case
- The effects of COVID 19
- Change related to UK's withdrawal from the European Union
- Airline Fleets
- E-commerce
- Market recovery and the need for capacity

**Ramsgate Town Council has submitted a detailed evidenced submission prepared for it by Alan Stratford Associates. It concludes:**

- (i) Heathrow is likely to continue to be the UK's main gateway for air cargo, along with Stansted and East Midlands Airports.
- (ii) (ii) The Airports National Policy Statement (ANPS), in which a new north-west runway at Heathrow is adopted as the preferred option for additional runway capacity in the southeast now has full legal status following an over-ruling by the Supreme Court. This would provide substantial additional passenger belly hold and dedicated freighter capacity and would significantly reduce the need for a new facility at Manston. Whilst it is possible that the third Heathrow runway is no longer required due to lower levels of future air traffic growth, this would also apply to Manston.
- (iii) (iii) The impacts of Covid-19 have increased the number of dedicated freighter ATMs across the UK. These impacts are expected to be temporary until belly hold capacity becomes available following the resumption of passenger flights. In the longer-term, the price differential of belly hold capacity over dedicated freighters is likely to widen as freighter aircraft are likely to have cost penalties due to their higher fuel and carbon emissions.
- (iv) (iv) Following a Public Inquiry for the expansion of Stansted held earlier this year, the airport agreed to reduce its number of permitted Cargo Air Transport Movements (CATMs) to 16,000 pa. This, however, is considerably more than its pre-Covid level of 10,627 in 2019. As such, there is considerable scope for expansion, if required, thereby reducing the need for a new facility at Manston. There is also substantial spare cargo capacity, including for night-time operations, at East Midlands, Birmingham, Manchester, and Doncaster Sheffield Airports.
- (v) (v) In the medium to long term, the impacts of Covid-19 and Brexit are likely to have a significant impact on UK GDP growth and its consequent effect on air freight (and passenger) demand. This will reduce the quantitative need for the proposed development at Manston.
- (vi) (vi) Several new logistics parks and fulfilment centres for e-commerce have been announced since 9 July 2019, most of which are in the 'Golden Triangle' in the East Midlands or in the M40 or M6 corridors, which are centrally located for onward distribution across the UK. Other airports, including East Midlands, Stansted, Birmingham, and Doncaster Sheffield, are better placed than Manston to serve these logistics parks and fulfilment centres.
- (vii) (vii) The Sixth Carbon Budget, which required UK international aviation to be included in its Net Zero targets from 2033 onwards, was enshrined in UK legislation on 22 June 2021. As a result. UK air passenger and cargo traffic will need to be substantially curtailed in the future, probably largely through price increases. This will significantly reduce the level of possible future air cargo (and passenger) demand at Manston. Furthermore, it should be noted that Manston's potential 1.9% share of the UK's aviation carbon target by 2050 is implicitly already allocated to other airports, many of which have existing planning consent for such growth. In these circumstances, DCO consent for the new Manston development, must be regarded as unjustified. (viii) The lack of any publicised support from cargo (or passenger) airlines, air freight integrators or the logistics industry, even after 15 February 2021 when it was announced that DfT's decision was to be re-assessed, suggests that there is little appetite for the proposed development.

- (viii) (ix) Whilst the impact of any lower traffic demand at Manston because of these changes would reduce the impact of aircraft noise for the local community, there would still be significant adverse noise effects particularly for those living in Ramsgate. (x) The expected reduced level of traffic demand will impact on the forecasted extent of employment created by the development if consent for the DCO were to be granted. The number of local tourists would similarly be expected to reduce, although the construction and operation of the new facility would still have an adverse impact on the local tourism industry, particularly in Ramsgate. (xi) In summary, the changes since 9 July 2021 significantly reduce the quantitative need for the proposed development, whilst substantial adverse impacts, such as its effect on climate change, aircraft noise and the local tourism industry remain. The PINS Inspector recommended that consent for the DCO should not be granted. We would concur with this view

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005680-Ramsgate%20Town%20Council.pdf>

In addition, there have been over 400 submissions from members of the public, community groups, local government councils and national bodies. About 190 of these were neutral or in favour of RSP's proposal although only 38 presented any evidence to answer the SoS's questions. Many of these submissions argued that the proposed development would be beneficial rather than "needed" in national terms.

The remaining over 200 submissions were opposed to the proposal, over half of these quoted previous submissions to the PINS enquiry or new evidence as was requested.

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipcsection=docs&stage=6&filter1=Re-determination&filter2=Consultation+1+responses>

In their report, the Secretary of State for Transport's appointed Independent Assessor, Ove Arup & Partners Ltd, confirmed PINs assessment and RTC's consultant's view that there is no proven need for a new freight airport at the former Manston Airport site in SE Kent that cannot be provided elsewhere. They summarise and endorse the ExA's conclusions:

"The ExA concluded that the levels of freight that the Proposed Development could expect to handle are modest and could be catered for at existing airports (Heathrow, Stansted, EMA, and others if the demand existed). The ExA considered that Manston appeared to offer no obvious advantages to outweigh the strong competition that such airports offer. The ExA therefore concluded that the Applicant failed to demonstrate sufficient need for the Proposed Development, additional to (or different from) the need which is met by the provision of existing airports. In particular, the ExA's Report arrived at the following conclusions:

- "The ExA was not convinced [by the Applicant's case] that there is a substantial gap between capacity and demand for general air freight within the Southeast at present". It concluded that "capacity is available or could be available at other airports within the Southeast or at other airports within reach of the Southeast should the demand exist" (E.R 5.7.23);
- The ExA considered that "the predominance of belly hold freight in the UK market as opposed to pure freight is to a large extent a by-product of the dominance of Heathrow in the UK aviation market". "In the ExA's view air freight would still primarily be attracted to the airports with the widest possible global networks for reasons of economies of scale" (E.R 5.7.18). The ExA was also "of the opinion that general air freight would continue to be well served in the UK with spare capacity at Stansted in the short term (to 2030) and the proposed Northwest Runway at Heathrow in the longer

term, and that new integrators are more likely to wish to be sited in a more central location” (E.R 5.7.24);

- The weight that the ExA placed on the Applicant’s forecasts was “reduced by the lack of interview transcripts available, and of the size and sample frame of many of the interviewees, when considering the size of the forecasts generated and there was little evidence that academic and industry experts had validated the approach of the Azimuth Report” (E.R 5.7.13). Overall, “the levels of freight that the proposed development could expect to handle are modest and could be catered for at existing airports” (E.R 5.7.28); and

- The ExA considered that the changing cargo industry proposed by the Applicant appeared “to be largely based on new integrators who would offer similar comprehensive delivery patterns and structures to established integrators but with less strict time restrictions. In the view of the ExA the likely locations for such integrators were likely to be closer to the centre of the country than Manston”. A more central position within the UK than Manston “offers more potential customers; within a three-hour drive from Manston only the Southeast and parts of the East of England can be reached, whereas most of England and Wales is within three hours of EMA” (E.R 5.7.22). The ExA concluded “that the failure to demonstrate sufficient need weighed substantially against the case for development consent being given” (E.R 8.2.26)

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf>

The Ove Arup report examines the changes that may have occurred since July 2019 under several headings:

National Policy including

- Airports National Policy (APNS),
- Transport Decarbonisation and
- Jet Zero Consultation

Local Policy, including

- Thanet Local Plan,

And the Quantitative need for the Development, including

- Changes in the need for Air Freight, including e-commerce,
- Impact of COVID 19 pandemic on belly hold capacity and increased use of freighters,
- the shift to narrow bodied aircraft post Brexit trade,
- the longer-term impacts of GDP on freight demand,
- specialised freight as a source of resilience,
- changes in capacity at other airports including Heathrow, Stansted, and East Midlands,
- the locational requirements for air freight

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. In particular:

- 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.
- The recent growth in e-commerce sales is not driving a demand for additional runway capacity for dedicated air freighters in the Southeast.
- Although there have been short term changes in the balance between belly hold freight and dedicated freighter activity during the Covid-19 pandemic, these changes are not expected to be permanent, notwithstanding growth in ecommerce and changes to the UK’s trading patterns post-Brexit.

- There is unlikely to be a significant reduction in belly hold freight capacity (once the passenger market recovers) due to the introduction of narrow-bodied twin-engine aircraft.
- 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; and
- 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.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005842-Manston%20DRAFT%20Assessors%20Report%20-%20Publicationv1.pdf>

Secretary of State has now written to The Applicant and Interested Parties, inviting comments on the Ove Arup report by 19 November 2021, (since been extended to 3<sup>rd</sup> Dec) when presumably he will remake his decision.

RSP have responded publicly

**Press release RSP 22/10/2021**

Having read the Assessor's report – which didn't take long – it is clear that it is an amateur and poorly constructed report.

Setting aside the numerous grammatical errors and typos – not to mention the reference at para 1.3 to a section on the sixth Carbon Budget that the author has then apparently forgotten to even write – the content of this report does not address the broader strategic need case set out in the Secretary of State's original decision letter and is little more than a by-the-numbers review of the Examining Authority's previous report, and series of opaque assertions using pre-2019 data, with little or no detailed analysis or reasoning behind any of the conclusions drawn.

To be honest, we have concluded that someone has accidentally sent an unfinished draft to the Department of Transport. For a report designed to inform the Government's decision making on the nation's long term global airfreight capacity needs, the thinking behind it appears firmly stuck in a pre-COVID past. It takes no account of the need for greater resilience in our logistics and infrastructure the pandemic has highlighted, the permanent disruption to the traditional 'just-in-time' business model that has occurred – and the requirement for enhanced cross border trading infrastructure required to address this – nor even the constraints at existing airports pre-COVID that will re-appear as the industry recovers and will only get worse in the medium to longer term.

The report therefore neither defines or deals with the need for Manston and pays absolutely no attention to the big picture strategic requirements of the UK in a post-pandemic, post-Brexit global market.

As aviation propositions go, Manston is unique – because it will be built to be Carbon Net Zero from scratch, providing a model for future airport planning. It represents a perfect opportunity for the UK Government to demonstrate how it can deliver on its commitment to grow the aviation sector, whilst still meeting its decarbonisation targets, a model approach which UK expertise can then export around the world. It also provides the prospect of becoming a flagship levelling-up project, by providing much needed economic and employment stimulus to one of the UK's most deprived areas – yet none of these considerations even feature in the report. Lower GDP will lower air freight demand? How about trying to increase GDP by increasing trading opportunities? Effectively, this report concludes that the Secretary of State should look in the rear-view mirror to try and plan the future. How embarrassing. We need to be looking forward to a new, decarbonised aviation industry,

serving the UK's global trading and levelling up ambitions. We will be responding in depth, in due course

Ramsgate Town Council submitted that its previously commissioned report from Stratford associates was still valid, agreed with all previous reports by industry experts including PIN's and Ove Arup, that a facility at Manston was not viable.

Nethercourt Residents' Association, the community nearest to the airport, between 1 and 1.5 Kilometres from the runway have commissioned Alan Stratford Associates to comment upon the conclusions of the Ove Arup assessment and other responses to the SoS's consultation including those by RSP.

ASA conclude:

- (i) Both the ExA's and the Independent Assessor's reports clearly concluded that the Applicant had not demonstrated sufficient need for the proposed Manston cargo hub development, based on an extensive assessment of the evidence available to them at the time.
- (ii) The requirement to demonstrate need i.e., to produce and justify evidence-based air freight (and passenger) forecasts to meet the NSIP requirements and to provide a commercially viable development is fundamental for approval of the DCO. If not, there is a possibility that DCO consent might be being sought for other purposes, such as increases in the asset value of the site and future land sales, with little or no prospect of a commercially sustainable cargo hub with the projected level of employment.
- (iii) Since the publication of the ExA's report, there have been several changes to the nature of the UK's air freight market and indeed the UK's freight market as a whole due to the impacts of Covid-19, Brexit and disruptions to global supply chains. Despite some recovery in air freight demand due to the increased use of dedicated freighters and temporary passenger/freighter conversions, the overall demand for UK air freight is still lower than pre-Covid 19 levels (a decline of some 8.2% between September 2019 and September 2021) based on the latest available CAA monthly statistics.
- (iv) Whilst there has been an increase in e-commerce and in dedicated freighter operations due to the pandemic and constraints in global supply chains, it is likely that the shares of seaborne and aircraft belly hold freight will return to broadly pre-pandemic levels once air passenger markets fully recover. In the medium to long-term, these modes will be more cost-effective for shippers due to measures to reduce carbon emissions from UK aviation.
- (v) As indicated in the ExA's report and reiterated in the Independent Assessor's report, London Heathrow, Stansted and East Midlands airports have historically handled the majority of the UK's air freight. The prospect of a third runway at Heathrow remains uncertain. If it were to proceed, it would provide additional passenger belly hold and potentially dedicated freighter capacity to meet long-term air freight demand, particularly at SE airports. If not, then the reduced UK air freight demand, coupled with measures to constrain air traffic due to climate change would diminish any need for additional capacity at Manston.
- (vi) Despite a reduction in the level of permitted cargo air transport movements (CATMs), Stansted still has scope for the expansion of air freight. East Midlands Airport is well located in the centre of the 'Golden Triangle' for UK logistics distribution and has substantial additional air freight capacity, particularly for night-time operations. The airport and the surrounding area have recently been given Freeport status which will enhance its attractiveness.



- (vii) We do not believe that there are any other locational factors which have emerged since the ExA's report was published that would change the need for the Manston development. We note that several new retail Customer Fulfilment Centres (CFC) have opened or been announced. These are broadly geographically distributed across the UK, with a particular focus on centralised locations, such as the Midlands. As such, they would tend to favour future air freight growth at existing UK airports, rather than Manston.
- (viii) The Applicant's employment forecasts for the Manston cargo hub are contingent on the need for the development (ie that the projected air freight and passenger forecasts will be achieved). We note that the Applicant has recently reduced its earlier forecasts presented at the PINS Inquiry due to the expected impact of automation, although this has not been quantified.
- (ix) The negative impact of the development on tourism in Ramsgate, which is directly under the main flight path to and from the airport was recognised in the ExA's report. Since this was published, the Covid19 pandemic has increased the demand for UK-based tourism (so called 'staycations') and further investment in Ramsgate's heritage and visitor attractions has been announced. These factors will increase the severity of the negative impacts of the cargo hub on tourism in Ramsgate.
- (x) The Government's proposed policy to meet the Jet Zero target for aviation by 2050 is highly challenging. The recommended strategy put forward is a 'high ambition' pathway, based on a combination of these measures, assuming a 60% increase in passenger/cargo equivalent traffic and 45% increase in air transport movements (ATMs) between 2018 and 2050. This represents average annual increases of 1.5% pa and 1.2% pa respectively. If the DCO is approved, Manston would need to be carbon neutral as an airport, but more importantly, Manston's traffic would need to be encompassed within these overall national air traffic growth targets, effectively reducing possible growth at other existing airports.
- (xi) Whilst there is no current Government policy on the restriction of airport expansion due to climate change constraints, further measures are likely be necessary to meet the necessary trajectories. Manston's overall carbon emissions would, in a worst-case scenario, account for some 1.9% of the Jet Zero target at 2050 and would effectively reduce the emissions and potential air traffic growth at other UK airports. In the circumstances, we believe that the Government's commitment to the Jet Zero target and the possible trajectories towards this represents a significant change to whether the proposed Manston development is consistent with current or emerging policy on climate change and would weigh heavily against DCO consent.

There has been a lot written concerning the impact of COVID on freight movements and whether the changes seen will last.

	Heathrow 2021				2019			EMA 2021				2019				Stanstead 2021				2019			
	Belly	freighter	total	total				Belly	Freighter	Total	total					Belly	Freighter	Total	total				
January	44370	49411	93781	130692				0	31105	31105	27603					53	22278	22331	17444				
February	39291	110558	149849	128065				0	32006	32006	24428					61	18758	18819	14592				
March	46253	91860	138113	149417				0	38053	38053	28914					77	24552	24629	19662				
April	45384	96160	141544	132893				0	38076	38076	26983					99	22605	22704	16817				
May	47189	70311	117500	134028				0	35124	35124	28291					16	22037	22053	17551				
June	53671	57388	111059	130873				0	35061	35061	26301					10	21623	21633	16798				
July	63802	75385	139187	130589				7	34099	34106	28495					16	21924	21940	18992				
August	67105	44391	111496	126864				0	31886	31886	25298					9	22633	22642	18309				
September	77304	39085	116389	125693				0	35790	35790	28270					26	20185	20211	19555				
October			0							0								0					
November			0							0								0					
December			0							0								0					
Totals	484369	634549	1118918	1189114	-5.90%			7	311200	311207	244583	27.24%				367	196595	196962	159720	23.32%			

The table above shows that for the three major freight hubs in the UK, freight movements are steadily reverting to the previous pattern of belly hold over dedicated freighter. There is no reason



to believe this trend will not continue. Although Heathrow is still running 6% behind 2019 belly hold is now well ahead of pure freighters with the clear winners being East Midlands and Stanstead with growth of 27% and 22% respectively

Similarly, there may have been a worldwide increase in shipping costs, but this has been less so in the UK and likely to be transient. Estimates by the World Bank suggest air freight is usually four to five times more expensive than road transport, and up to 16 times more than sea. This has typically meant only some products earn a plane ticket: certain fresh foods, time-sensitive documents, pharmaceuticals and cut flowers, for example.”. Air freight’s market share has effectively remained unchanged over the period 2009 to 2019, at around 1.5%.

## **Conclusion**

It is clear from everything above that nationally, there is no case for Manston, indeed given the impact of COVID on UK’s airports and the future impact of the country’s net zero targets there is every reason to consider aid to existing airports rather than approve potential competition.

There is every reason to believe that should the DCO be approved that the required development would not materialise or would fail with a few years as have all past attempts to run a viable airport from that location.

RSP have variously promised an investment of between £300M and £500M to create the NISP qualifying freight hub they imagine. They would begin with the burden of repayment of this debt and of financing interest payments in a market of rising rates. They have never been challenged to identify a source of this funding or produce a detailed business case showing what level of business and handling charges they would need to generate to service their debt. They have not identified any end users, airlines, or freight handlers

RSP claim that because they are creating a new facility, they would find the constraints of net zero compliance easier to meet than existing airports. In a very narrow sense, this may be true, but their build carbon costs and the cost of trucks supplying fuel without a pipeline or railhead must be balanced against this.

Although RSP have reduced their claims for the number of jobs they would create directly through the freight hub and associated businesses, it is this aspect that supporters of the airport focus upon when pressed. There is no doubt that if the scheme was successful despite the evidence of previous attempts, then some jobs would be required. Previously, the maximum employed was around 160 fte. There is no doubt that a new facility would be fully automated to a degree not seen previously and we already know that administration and air traffic control would not be on site.

In January 2020, Thanet District Council commissioned Blue Sail to review its approach to the visitor economy. Their assessment is that “Visitors are vital to Thanet. Not just for the jobs – and 1 in every 5 jobs is in tourism – but because they support local services, and locals’ quality of life. They play a really important role in making the Isle of Thanet a good place to live, and an attractive place to study, work and invest in. Tourism growth has been impressive in recent years: annual visitor spend (direct and indirect) has grown to £319m – that’s 30% more than in 2013, the year the first Destination Management Plan (DMP) was published. There are over 2,000 more jobs (1.4k FTE) – bringing total jobs to 7,950. Visitor satisfaction has risen, and research shows external perceptions have improved. Industry stakeholders continue to have a strong level of commitment and passion for the place – and enthusiasm for developing the visitor offer. But – despite improvements, growth, and increased visitor satisfaction – Thanet’s visitor economy feels vulnerable.”

A new freight hub is in a zero-sum situation regarding employment with Thanet's and Ramsgate's increasingly vibrant visitor economy, attracted by its heritage architecture and coastal environment. The area is currently in receipt of government grants to enhance, protect and exploit both these aspects. A freight hub, with frequent overflying at 500 ft or less would threaten the considerable progress being made.

Thanet District Council is currently consulting regarding a revision of the Local Development Plan. This was ordered by the Planning Inspector due partly to uncertainty regarding the Manston Site. He safeguarded the site for aviation, but only until the DCO application was decided. The call for sites to meet Thanet's extended housing requirements has been unsuccessful, and a new call for sites is current. There is strong and growing opposition locally to plans to build housing on green field agricultural land.

There are alternatives to RSP's freight hub plans, that would be a better fit to Thanet's needs for housing and employment development and which would enhance Ramsgate aspiration as a visitor destination. Stone Hill Park was formed as a joint venture between Chris Musgrave, Trevor Cartner and Stagecoach co-founder Dame Ann Gloag OBE to advance proposals for a comprehensive redevelopment of the former Manston Airport site in Thanet. The vision for the scheme was a new settlement that would transform the historic WWII airfield into a sustainable new community delivering much needed homes, jobs and training opportunities, aviation heritage attractions, a new country park and The East Kent Sports Village. In May 2018 the second of two planning applications was submitted setting out proposals for:

Up to 3,700 homes built over a 15-20 year period;

46,000 sq. m of advanced/hi-tech employment space; with

A heritage airport for classic and vintage flights connected to a new museum quarter.

Schools, a 120-bed hotel, space for a higher education campus and

Repurposing of the main runway as a recreational and community space.

In July 2019 Stone Hill Park agreed terms with RSP for the sale of the Manston Airport site, setting in place strong covenants to protect its previous investment in the site. The precise nature of these covenants has not been disclosed but would expect to be triggered should RSP's plans not be fulfilled.