

For the attention of the Manston Airport Case Team

The National Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

2nd December 2021

Dear Sir/Madam

Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010

Re-determination of the Application by RiverOak Strategic Partners Limited ('the Applicant') for an Order granting Development Consent for the reopening and development of Manston Airport in Kent

Secretary of State Consultation 2

In my letter of 6 July 2021 I opposed the application for DCO on the basis that the Applicant had failed to make out its case a DCO for re-opening and developing the airport.

I also submitted that the Applicant needs to demonstrate that its case for a DCO takes full account of the impact of the pandemic and, if it doesn't, then the application should be rejected.

I have now read the report of the independent assessor, Ove Arup, and agree with its assessment of the case for a DCO and its conclusion.

The Applicant has rejected Ove Arup's report and, essentially, is now arguing that the report has not fully taken account of the contribution Manston can make to creating a more resilient UK freight transport infrastructure post-Brexit or the growth in e-commerce sales in the wake of the pandemic which is driving a demand for additional runway capacity for a dedicated air freight in the south-east.

I believe that these arguments are fully addressed in sections 4 & 5 of the report which provide hard evidence in support of its conclusions. I can, however, see very little hard evidence from the Applicant to show how these

arguments strengthen the case for a DCO. I also see very little hard evidence from the Applicant to show how its proposal to develop Manston will support the government's latest net zero emission targets.

The Secretary of State's re-determination of the application must be based on hard evidence: it cannot simply be based on the aspirations of the Applicant and its supporters.

I accept that the Applicant has now taken account of the impact of Brexit, the pandemic and climate changes on its case for a DCO to re-open Manston Airport as a cargo hub.

However, *on the evidence*, I consider that the Applicant has failed to make out its case for a DCO and that on re-determination the application should be rejected.

Yours faithfully

Lionel Jermy

