To:     Secretary of State for Transport          Date: 2 December 2021

℅ Planning Inspectorate,                          Our Ref: SoS/R/023B

National Infrastructure Planning


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**For the attention of the Manston Airport Case Team**

1.     This submission is in response to the SoSFT's letter of 21 October 2021 and specifically paragraph 6.

2.     We submit our comment to the First Round of Consultation herewith as a formal consultation response to the Second Round of Consultation.

3.     Our comment is in response to Adrian Hilton [TR020002-005558] and Brendan Martin [TR020002-005473] (together the "**AB Submissions**"); in which reference is made to passenger flights.

4.     Although the Proposed Development is for a *cargo-led* airport, we address domestic (and international) air connectivity in this submission.

5.     We also provide evidence to show the importance of supporting UKNET Airports over any new airports - particularly a new airport in the South East - as well as evidence that the Proposed Development's Catchment Area **already has** good to very good domestic (and international) air connectivity to 5 UKNET airports.

6.     We submit **new evidence** by way of the Union Connectivity Review[1] ("**UCR**") published on 26 November 2021 that identifies the UKNET – a strategic transport network for the whole United Kingdom and focuses specifically on those that are important for connectivity between the nations of the UK and where improvements to those would serve the UK better.

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[1] Union Connectivity Review published 26 November 2021 Available online at:

███████████████████████████████████ (accessed 30 November 2021)

7.  The Proposed Development is not identified as part of UKNET. Further, the region the Proposed Development is located in has not been identified as a major city, fast-growth city or a regional economic centre.

8.  The map below shows the UCR's **UKNET – a strategic transport network for the whole United Kingdom**[2].
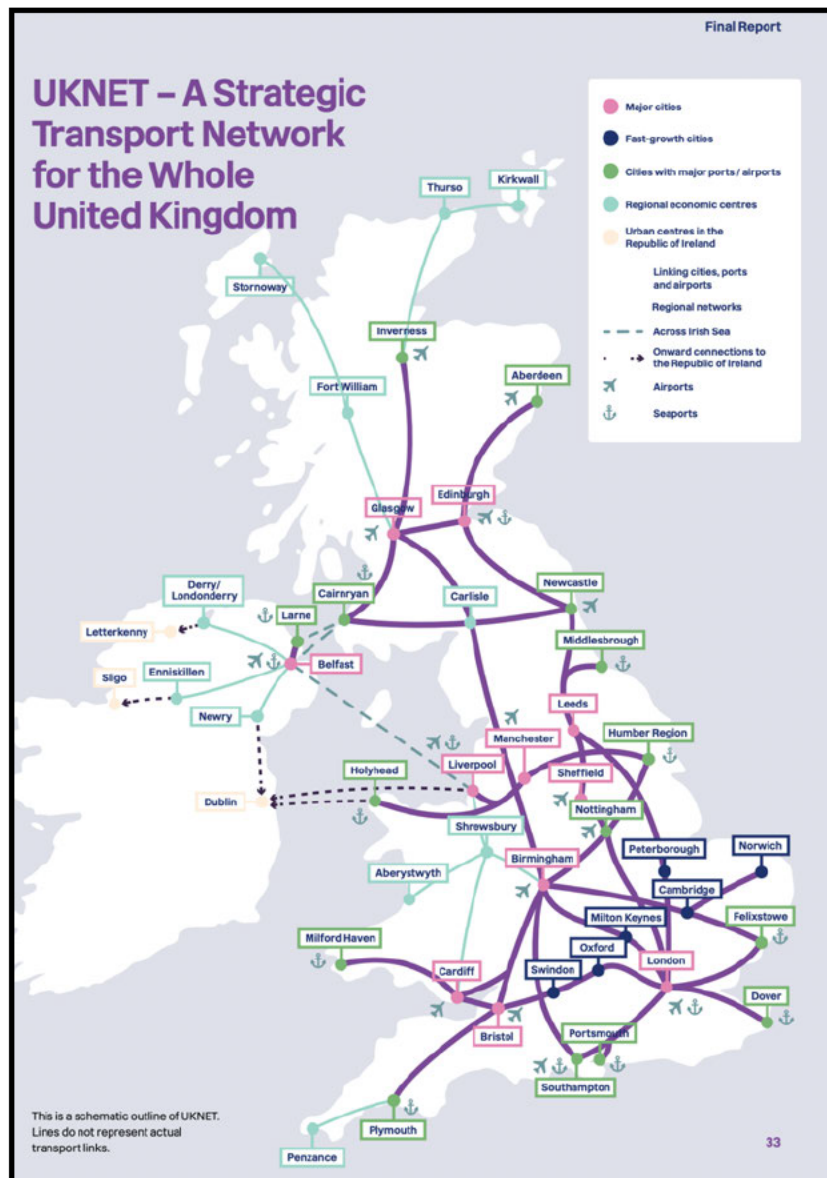


**Not Identified as a UKNET Airport**

[2] Page 33 Union Connectivity Review published 26 November 2021 Available online at: ███████████████████████████ (accessed 30 November 2021)

9. The UCR has identified the UKNET airports[3] as follows: Aberdeen • Belfast City • Belfast International • Birmingham • Bristol • Cardiff • Doncaster Sheffield • East Midlands • Edinburgh • Gatwick • Glasgow • Heathrow • Inverness • Liverpool (John Lennon) • London City • Luton • Manchester • Newcastle • Southampton • Stansted.

10. The Proposed Development has not been identified as a UKNET airport.

11. As you will be aware, the UCR states that:

    "**Domestic aviation** is particularly **important for Northern Ireland** and the more **northern regions of Scotland** and is also **key for connecting to international travel**. Airports have been identified as key elements of UKNET and support for **aviation connections to these transport hubs** is essential for the successful operation of UKNET[4]" (bold added for emphasis).

12. The Proposed Development is not in Northern Ireland or in the northern regions of Scotland. The Proposed Development is in Thanet, in East Kent in the South East.

## UKNET AIRPORT, London City : Domestic Connectivity by Air

13. Currently the East Kent region is serviced by the UKNET AIRPORT, London City[5] for domestic connectivity by air as well as and in addition to the UKNET Airports - Gatwick, Heathrow, Luton, Stansted[6] and the non UKNET Airport-Southend. Of course all of these airports also serve key international as well as domestic routes.

14. As you will be aware, it is faster to travel from the UKNET AIRPORT, London City to East Kent stations than it would be to travel from the Proposed Development

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[3] Page 29 Union Connectivity Review published 26 November 2021 Available online at:

███████████████████████████ (accessed 30 November 2021)
[4] Page 62
███████████████████████████
███████████████ ccessed 30 November 2021)
[5] Page 29 Union Connectivity Review published 26 November 2021 Available online at:
███████████████████████████
███████████████ accessed 30 November 2021)
[6] Ibid

to East Kent stations (save from to Ramsgate[7]).

15. Please see Tables below:

| Airport | Train Station in East Kent | Journey Time By Sustainable Transport[8] | Destinations including Domestic |
|---------|---------------------------|------------------------------------------|--------------------------------|

| Airport | Train Station in East Kent | Journey Time By Sustainable Transport | Destinations including Domestic |
|---------|---------------------------|---------------------------------------|--------------------------------|
| London City Airport | Ashford International | Fastest - 55 minutes[9] | 45 destinations including but not limited to domestic locations of Belfast Northern Ireland; Dundee Scotland, Edinburgh Scotland; Glasgow Scotland |
| Proposed Development | Ashford International | Fastest - 63 minutes[10] | None Confirmed |

| Airport | Train Station in East Kent | Journey Time By Sustainable Transport | Destinations including Domestic |
|---------|---------------------------|---------------------------------------|--------------------------------|
| London City Airport | Canterbury West | Fastest - 71 minutes[11] | 45 destinations including but not limited to domestic locations of Belfast Northern Ireland; Dundee Scotland, Edinburgh Scotland; Glasgow Scotland |
| Proposed Development | Canterbury West | Fastest - 84 minutes[12] | None Confirmed |

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[7] Ramsgate in Thanet has a population of 42,000. The population of all of Thanet is 141,000. The population of East Kent is around 695,000

[8] Source Google Map taking the departure time of as close to 09:00 am on Friday as possible for each destination. A Combination of Sustainable Transport - Bus, DLR, Tube, Train, Walk depending on the Route.

[9] Source Google Map 9.19 AM departure time

[10] Source Google Map 9.38 AM departure time

[11] Source Google Map 8.55 AM departure time

[12] Source Google Map 8.59 AM departure time

| Airport | Train Station in East Kent | Journey Time By Sustainable Transport[13] | Destinations including Domestic |
|---|---|---|---|
| London City Airport | Dover Priory | Fastest - 79 minutes[14] | 45 destinations including but not limited to domestic locations of Belfast Northern Ireland; Dundee Scotland, Edinburgh Scotland; Glasgow Scotland |
| Proposed Development | Dover Priory | Fastest - 82 minutes[15] | None Confirmed |

| London City Airport | Ramsgate | Fastest - 93 minutes[16] | 45 destinations including but not limited to domestic locations of Belfast Northern Ireland; Dundee Scotland, Edinburgh Scotland; Glasgow Scotland |
|---|---|---|---|
| Proposed Development | Ramsgate | Fastest - 53 minutes[17] | None Confirmed |

16. As cited above the UCR has stated "*Airports have been identified as key elements of UKNET and **support for aviation connections to these transport***

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[13] Source Google Map taking the departure time of as close to 09:00 am on Friday as possible for each destination. A Combination of Bus, DLR, Tube, Train, Walk depending on the Route.
[14] Source Google Map 9.19 AM departure time
[15] Source Google Map 9.38 AM departure time
[16] Source Google Map 8.55 AM departure time
[17] Source Google Map 8.55 AM departure time

*hubs* is essential for the ***successful operation of UKNET***[18]" (bold added for emphasis).

17. Therefore, it is essential to support an existing UKNET airport's survival and must take precedence over any new airport opening in order for the successful operation of UKNET.

18. As evidenced above, not only is it faster to travel from the UKNET AIRPORT, London City to East Kent stations than it would be to travel from the Proposed Development to East Kent stations, but London City Airport is also a UKNET airport.

19. In addition, the comparatively shorter travel times to and from UKNET AIRPORT London City will limit the Proposed Development's catchment area.

## <mark>Very Good Domestic and International Connectivity</mark>

20. Since the examination, the construction of Thanet Parkway Train Station is well underway and the station is expected to officially open in December 2022 with access to London St Pancras International at under an hour from Thanet[19]. Currently access to London from Thanet from Ramsgate Train Station is over an hour; 78 minutes.

21. Both Ramsgate Train Station and Thanet Parkway Train Station are on the Ashford International to Ramsgate line. This line ends at London 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 Sheffield[20]; as well as the

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[18] Page 62

(accessed 30 November 2021)

[19] h
(accessed 30 November 2021)

[20] (accessed 30 November 2021)

b. Thameslink Programme which serves Bedford, UKNET AIRPORT Luton, St Albans City, Cambridge, Peterborough in the North and Wimbledon, Sutton, East Croydon, UKNET AIRPORT Gatwick and Brighton in the South [21]; 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 Kent[22].

22.     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 Inverness[23].

23.     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 station[24]. It links 6 underground lines and is the best connected interchange on the London Underground network[25]. 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 change[26]. UKNET AIRPORT Heathrow Airport is also easily accessed directly via the Underground's Piccadilly Line from St Pancras station.

24.     As evidenced above the Proposed Development's catchment area **already has** good to very good domestic and international connectivity by rail and by air at UKNET airports London City, Luton, Heathrow, Stansted and Gatwick.

[21] ████████████████████████████████ (accessed 30 November 2021)
[22] ████████████████████████████████ (accessed 30 November 2021)
[23] ████████████████████████████████ (accessed 30 November 2021)
[24] ████████████████████████████████ (accessed 30 November 2021)
sourced from "Station Usage Data" (CSV). *Usage Statistics for London Stations, 2018.* ████████ ████████████████ from the original on 22 May 2020. Retrieved 27 April 2020.
[25] ████████████████████████ (accessed 30 November 2021)
[26] ████████████████████████ (accessed 30 November 2021)