

Manston Airport – We don't need it and we don't want it.

Riveroak Strategic Partners 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 Riveroak Strategic Partners 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 Transport¹ (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 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. There are therefore many reasons that the DCO should not be granted:

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.

Jenny Dawes has submitted a detailed evidenced submission prepared for her by York Aviation. Those evidences should be considered in detail.

Ramsgate Town Council has submitted a detailed evidenced submission prepared for it by Alan Stratford Associates, which concludes:

Heathrow is likely to continue to be the UK's main gateway for air cargo, along with Stansted and East Midlands Airports.

Following a Public Inquiry for the expansion of Stanstead 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.

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.

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.**

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:

That Riveroak Strategic Partners 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.

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. Despite a reduction in the level of permitted cargo air transport movements (CATMs), Stanstead still has scope for the expansion of air freight. East Midlands Airport is well located in the centre of the 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.

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.

Riveroak Strategic Partners employment forecasts for the Manston cargo hub are hugely exaggerated and the Applicant has recently reduced its earlier forecasts presented at the PINS Inquiry due to the expected impact of automation.

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 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.

The Government's proposed policy to meet the Jet Zero target for aviation by 2050 is highly challenging. 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. Manston's overall carbon emissions would, in a worst-case scenario, account for some 1.9% of the Net Zero target at 2050 and would effectively reduce the emissions and potential air traffic growth at other UK airports. In the circumstances 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.

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

Although RSP have reduced their claims for the number of jobs they would create, 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.

A new freight hub would catastrophically impact Thanet's and Ramsgate's increasingly vibrant visitor economy. The area is currently in receipt of government grants to enhance, protect and exploit tourism in Thanet. A freight hub, with frequent overflying at 500 ft or less would threaten this.