

2nd December 2021

Dear Sirs

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

EXTENSION TO THE DEADLINE FOR RESPONSES - CONSULTATION ON THE INDEPENDENT AVIATION ASSESSOR'S DRAFT REPORT AND THE REPRESENTATIONS RECEIVED ON THE STATEMENT OF MATTERS

I was astounded to read the draft report prepared by ARUP on behalf of the SoS. It was only 41 pages long, amateurish, poorly evidenced and poorly constructed. There is reliance on weighted reports commissioned by Stone Hill Park (SHP), the previous owners of Manston Airport, that have since been totally discredited....yet ARUP have accepted those too without questioning the validity, eg

- pp. 28-32, The evidence base for the author of the ARUP Report's conclusions requires much more detail if it is to be considered at least arguable or proved.
- pp. 39-40, that (and the rest of the Draft Report) is thin on statistical detail and analysis and then lamely follows the Examining Authority's conclusions which were not rooted in any or any sufficient hard evidence.

It seems that much of the aviation data is pre the Secretary of State's letter (9 July 2019). Such data should not be there at all according to the DfT guidelines. It should be replaced by the plentiful much more up-to-date information that is now available, showing a strong up-turn in aviation cargo.

Regarding need for Manston Airport, the report only has three references to jobs (at Heathrow, in Kent, and a dubious figure for Manston) and no references to changes in Thanet / East Kent deprivation, in the relevant timescale of the report, is shocking.

Just what does constitute Need?

- Is it the Need in this part of Kent for more jobs in an area of high deprivation? ref Kent County Council's latest report of 2019: [REDACTED]
- Is it the Need of inward investment of more than £300m of private money to get Manston Airport operational again? This being an existing facility just waiting to be utilised to its full extent. How can any government or region turn down such an opportunity for this once-in-a-lifetime amount of investment? The investors have already spent over £35m to date in getting this far.
- Is it the Need for more alternatives for air cargo operations and one near the Channel ports especially post-Brexit? Air cargo has increased by 9.1% according to the International Air Transport Association (IATA) but capacity constrained globally particularly being affected by the Covid pandemic [h](#) [REDACTED]

However, there is a Need to consider the anti-competitive, anti-free market approach that has been evident in the findings of the Examining Authority, the Avia Report, the ARUP Report, and of course the mother of all anti-competitive reports, the Davies Report, all of which ought to have been deflected by much that lies within the Making Best Use policy, a policy which at its root IS consistent with competitive free-market economics when it comes to attracting inward investment in infrastructure development, a key policy objective that lies right at the heart of the current Government's political philosophy and 'levelling up' aspirations.

The whole purpose of identifying NSIP projects (which in this instance was certified by the then Secretary of State for Housing, Communities and Local Government as being in order to be accepted for

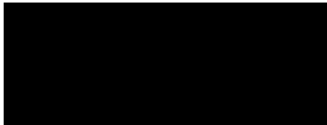
examination in August 2018) is meant to streamline and promote projects for infrastructure development and overcome NIMBYism. That is all RiverOak (RSP) have sought from the beginning: an opportunity to invest in what they themselves have determined will be a profitable enterprise with a satisfactory return on a very large investment which is likely to operate successfully long into the future. That's the real essence of the matter: should the free market decide or should consultant forecasters of varying sophistication and expertise? Whose money is at stake? The Government's? Not in the case of this NSIP: it is all being funded by inward investment, will be built here, operated here, lead to training and employment opportunities here, work with other local and regional stakeholders here in private businesses and communities, pay taxes here, and along the way transform the income stream of the damned near-bankrupt local authority here.

There is now at least one French politician who suggests the Treaty of Le Touquet 2003 between France and Britain with opposing border posts currently in the country of departure be discontinued. Doing so would affect cross channel trucking from EU airports to the UK. This trucking has been happening since the closure of Manston in 2014 with airfreight flying into the likes of Ostend in Belgium to be near the Channel ports for a quick drive to the UK. If the existing Treaty is discontinued that will mean the existing border checks at the Channel ports and Eurotunnel will revert to the country of entry and could make for long queues at the point of entry. Over the past few years the UK has a greater Need to ensure that there are more options for sites for air cargo movements than currently exists especially with the container ports and their backlogs of containers affecting delivery by ship to the UK. Some companies have had to move cargo by air to ensure deliveries being on time and not months late. An operational Manston will go a long way in assisting this.

Anyone with any common sense supports the reopening of Manston Airport by RSP as a cargo hub which will, contrary to the belief of a limited number of individuals, not be operating 24/7.

I fully support the reopening of Manston Airport and the DCO application by RSP and hope that the SoS does so too in his decision.

Yours sincerely

A solid black rectangular box used to redact the signature of John Bates.

John Bates BSc, MRSC