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To: [Manston Airport](#)
Subject: Manston Airport Consultation
Date: 03 December 2021 11:39:29

MANSTON AIRPORT PROPOSALS

Conclusion I agree with the overall conclusion reached by the Independent Aviation Assessor "*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 I would like to stress:-

Location The former operations at Manston Airport failed to be successful because of its location on the Isle of Thanet, at the extreme south eastern corner of the UK. This location rendered it uncompetitive to other airports serving the South East. It is surrounded on three sides by the sea and has a very limited local market catchment in East Kent. The only realistic connection to the significant markets in the South East and the rest of the country is via M2/M20 and M25. A route which it shares with the Port of Dover which is particularly prone to congestion and disruption. It is also to be noted that fuel deliveries to Manston would also have to use these congested routes.

Competition The bulk of any freight bound for Manston would have to pass closer to many airports including Heathrow, Gatwick, Luton, Stanstead, Southend and, in some cases, even Bournemouth and Southampton. All of the important components of the South East's market for airfreight are closer to a number of these airports.

Market Share Since many recent reports have not identified any shortfall in capacity for airfreight facilities in the South East, it would only be possibly for Manston to be successful if it could win market share from its competitors. It is also noted that the many attempts at running passenger operations from Manston have all failed, due to the small size of the local catchment. It is unlikely, therefore that passenger operations could ever provide a significant contribution to its running costs. The airport would have to substantially survive on its income from freight operations which would also put it at a further competitive disadvantage.

Local Economy In these circumstances, any contribution that Manston could make to the local economy of East Kent would certainly be outweighed by the significant environment disbenefits resulting from both the aircraft and the increased road congestion. It is certainly arguable that the airport would damage the visitor economy of Ramsgate.

Alternatives Manston is a large green-field site which is ripe for redevelopment. Using the site in the place of local farmland, currently proposed for developments required by government, would be a sensible and environmentally friendly option.

Global Warming In addition to the local environmental disbenefits associated with the Manson Airport proposals, the current international efforts being explored to avoid global warming render it unlikely that measures to increase and encourage airfreight could reasonably be considered to be appropriate. Although small electric aircraft may be possible in the foreseeable future, environmentally friendly airfreight is a very long way off.

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