

To Pins

Re: Arup Report - Manston Airport Applicatio

Comments and representation

The EXA state that they are not convinced of the applicant's case for need which I disagree with.

Manston is less than an hour from London. The M25 northwards and reached in 2 hours. This is favourable to Midland and Stanstead airport. The traffic associated with these airports are immense. Weather conditions can easily affect their continuous use. Most larger Airports are north of London. South of London there are no major airports for freight except for Gatwick consists of Passenger trade predominantly and is hoping to use its emergency runway for main flight. If an emergency occurs who would be able to deal with it. Manston can cope with Terror attacks, major incidents and adverse weather conditions, which look to be increasing with World turmoil and climate change, as well as for engine failure where an emergency landing is necessary. Manston is situated away from built up areas and has a long wide runway that can accommodate national needs. If Manston is lost, then there is nowhere in the Southeast capable of serving the country in such matters

'The Application proposed that the DCO might be granted in Autumn 2019, with full reopening in year 2 which at the time of submission of the application was expected to be 2020. The determination period is roughly two years behind that anticipated at the time of submission, and the full reopening date is therefore assumed to be approximately two years behind'

I have wondered why there has been such a delay in getting the DCO finalised? During this delay so much has happened on the world theatre and at home. Nothing can now be relied upon. Recent events taking place have created a fluid, dysfunctional atmosphere where nothing is set in stone. This report does not cover an open thinking, creative and dynamic future that will be needing in this area of aviation.

This Assessors Report has too many, 'considerations' and 'they think' and 'maybes' based on Data that is now in the main invalid to today and in the future.

The report states

'The Endnotes of the Jet Zero consultation document further clarify this, confirming that:

"Beyond the horizon | The future of UK aviation | Making best use of existing runways (2018) and Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (2018) are the most up-to-date policy on planning for airport development. They continue to have full effect.'

RSP seem to fit this remit. At the time, and even more now TDC was operating in a dysfunctional manner, whilst people were against the airport there were more who were not and whose voices have not been heard, even after repeated demonstrations. The head of council were in conversation with Stone Hill on a housing project which the majority of the Isle of Thanet were against. The Leader of TDC left and replaced. The local plan had to be

relooked at in desperate circumstances. The TDC is under examination for its planning decisions. The majority of the Isle of Thanet want the airport and this report has failed to seek out the truth of the communities need and desire to get the airport up and running for the benefit of the people of Thanet, south of England and the country.

*It was stated 'York Aviation on behalf of Jennifer Dawes, considers other policies in the Plan, such as SP04, **are aimed at creating 5,000 jobs** in the local areas on identified employment sites, which do not include Manston Airport. The Application site is not identified as an employment site, however SP04 is supportive of all new job creation both within and outside identified employment sites.'*

Sites for employment were unused for years as without the Airport input. When the airport was running new developments were to be a lifeline to the businesses in southeast. On the closure of the airport, jobs and businesses closed who were associated with the airport. York Aviation on behalf of Jennifer Dawes puts forward blinkered views. If five thousand jobs can be identified as employment sites, which do not include Manston Airport, then that is an added bonus. However, over ears these plots of land have not been taken for new incoming business, while others have been land banked for housing. Smaller local businesses that have managed to survive are waiting for the airport to take off. I do not know how long Jennifer Dawes has lived in Thanet and has seen the airport before being run down deliberately for housing. I cannot understand her Ramsgate stance of making Ramsgate more Tourist friendly, and that she feels an airport would have a negative effect. Many successful tourist destinations have an airport nearby. Going back over the years Ramsgate's problems are nothing to do with the airport. Any substantial development of any size that could gain employment opportunities would not fit into Jennifer Dawes scheme of things. The Airport whose access would not interfere with local towns or put pressure on local roads is ideal for the Isle of Thanet. Local policy is to improve the towns and services, create worthwhile employment opportunities. The hospitality section and service section cannot fulfil the aspirations of young people who have hungered for more worthwhile skilled and professional work. Improved infrastructure will be achieved by successful business input and a skilled workforce.

'No forecasts of future e-commerce volume or market share have been put forward through the SoM consultation. The Independent Assessor considers that the extent to which recent trends in e-commerce will persist long-term following the Covid19 pandemic is not yet clear.'

'It is necessary to consider whether the growth in e-commerce has created a more favourable environment for air freight than that identified by the ExA Report.'

Any forecasts cannot be relied on for several reasons.

York aviation on behalf of Jennifer Dawes may seek to cast doubt on the link between e-commerce and air freight but the facts are that nobody yet knows how the Pandemic and Brexit will affect this. The world is in turmoil and now with Climate Change, who knows how world trade will develop. It could be said that having a large freight Hub in the south of England with good rail and sea connections could be more beneficial for the country and its exporting initiatives.

“Increases in e-commerce activity, however, do not necessarily lead to an increase in the volumes of air freight carried to or from UK airports. Consumers have long purchased goods made in China for example, which are transported to the UK by both air and surface modes. Even if some goods that were previously bought in physical stores are now bought online, these goods generally share the same journey from China to the UK, but rather than being shipped directly to the retailer’s distribution centre for onward travel to the physical store, they are being shipped to an online retailer’s distribution centre for last-mile dispatch direct to consumers. Therefore, whilst increased e-commerce activity has resulted in an increase in demand for last-mile logistics between distribution centres and consumers, there has so far been a negligible net impact in the volumes of air freight carried to and from UK airports.”

This summation relates to old data. We now have a situation of lack of HGV drivers and forthcoming changes in operations at Dover which will cause difficulties and delays with no answers to these problems on the horizon. Problems are increasing with world trade with relations with China and eastern Europe fragile.

It is now likely that there will be more disruption in our country, with discontent and political problems. Manston could be a vital resource. It is just an opinion much as Jennifer Dawes states, but one not dated on the past but on the future which is unknown. Trade, imports, exports, e-commerce and the importance of our systems be something that would involve Manston. No one can say for certain, and all these figures could be pointless, to rely on them as being factual evidence in such times of uncertainty is a problem. What we should be doing is looking at alternatives in new methods, a total shift of ideas that Manston will bring to the benefit of all.

No allowance is made for these changes and unknown outcomes in Jennifer Dawes opinions backed by York Aviation. York Aviation have taken data from their previous report on Manston when the world was in a different situation and is stating the same old, same old when the whole landscape has changed. Surely it is the intelligent stance to be cautious and prepared for all outcomes.

Southeast England is the third largest region of England, with an area of 19,096 km² (7,373 sq. mi) and is also the most populous with a total population of over eight and a half million (2011). The region contains seven legally chartered cities: Brighton and Hove, Canterbury, Chichester, Oxford, Portsmouth, Southampton and Winchester.

M2 motorway/A2 and M20, serve Kent; M23 through Surrey and West Sussex; the M3 through Surrey and Hampshire. All these routes connect to the M25, which runs near to and occasionally through the region's border with Greater London.

Regional airports at (Kent International Airport Ramsgate), Shoreham Airport and Southampton Airport are on the south coast. All these airports are small and do-little freight. Their futures are uncertain since passenger air travel has reduced due to the pandemic.

The main intercontinental airport is Gatwick Airport. Heathrow Airport is in Greater London but also serves the Southeast region. Both these airports are under pressure for runway space. Heathrow is due to have a new runway in the long distant future. This would mean more air pollution and the loss of people’s homes and communities. The damage

caused to people's health and mental wellbeing is vast and for these reasons the extension has been strenuously contested.

Gatwick is in desperate need of runway space and intend using their emergency runway. This is unwise as if any emergencies occur such as terrorism, emergency and severe weather conditions there is no runway emergency runway, and Heathrow should be avoided as too near to London. The only runway that could deal with such an emergency is at Manston so providing a vital service to the country.

According to CAA statistics, total freight tonnage to/from UK airports fell sharply in April 2020, but quickly recovered to levels below what was seen prior to Covid-19, though with higher proportions of freight carried by freighter aircraft rather than bellyhold.

I have no evidence either way as to freight numbers, statistics, and hope that Roger Gales Questions can add more depth. Environmental and climate change factors and a fresh look towards the future of aviation should have been considered in this report.

It is stated that 'Ramsgate Society Manston's representation'¹ tabulates CAA statistics on freight tonnage and ATMs in 2019 and 2020 and conclude: "EMA and Stansted each increased the weight of cargo aircraft freight year on year. Heathrow achieved a remarkable switch by upping cargo aircraft ATMs by over 800% and in doing so to carry over four and a half times the weight of cargo compared to 2019. Overall air cargo capacity was sustained despite the almost total loss of bellyhold during 2020. This remarkable ability to respond so rapidly was only possible because there is the capacity at the airports to deal with the flights, the shift in carrier types as well as handle and despatch the freight on the ground"

This will only be achieved by increasing stress on the environment, instead of increasing freight onto the larger airports where the towns and villages are already fighting pollution. Sharing out distribution to regional airports of which Manston is ideal as it has a runway of over 9.000', surrounded on three side by sea, pollution is minimal.

The report states. 'The long-term impacts of the freeport schemes are as yet unknown. Nevertheless, the Independent Assessor accepts that a more favourable regulatory environment, combined with investment in new facilities, could support the growth of EMA. The Freeport may act to reduce cargo capacity headroom however freeports exist to import goods, add value, and re-export them. Therefore, the goods managed by EMA would not contribute to the UK's export and import requirements – though it is not possible to say the capacity will be used in this way. None of the proposed freeports are located in or around the Application Site.

What is the point of relying on Midland Airport improving its abilities at great cost when Manston already has the needed infrastructure, and the developments be achieved even sooner? Midland is a working airport trying to get its passenger trade back. Midland airport is surrounded by larger airports north of London, whereas the south of London is not. Also, on its doorstep Manston has a port, Ramsgate could be a freeport. It makes sense to use Manston as it too has a favourable regulatory environment, combined with investment in new facilities. It states that EMA have sufficient runway. Has it?

¹

None of the proposed freeport are located in the Southeast, why?

Lydd Airport is unsuitable, without its extension is unable to take large planes. It is also situated within natural habitations of unique interests.

Moreover, Lydd Airport (to the south of Ashford) serves light aircraft. In 2014 it was given permission to extend its runway and build a new terminal - though this expansion has not yet gone ahead². Fundamentally, the need case for or against the redevelopment and reopening of Manston airport – given the overarching nature of the development – rests on cargo demand.

A planned pilot school and educational facilities at Manston is invaluable to the country yet no mention made of this as being important.

'Despite the uncertainty concerning the timescale for the Heathrow Airport Third Runway, changes since July 2019 as described do not lead the Independent Assessor to reach a different conclusion on the need case for Manston Airport. East Midlands Airport has sufficient capacity to handle additional dedicated freighter services should the market demand them, while the planning determination at Stansted confirms that significant freight capacity remains available'

I wish to dispute that there is no new evidence and suggest a relook as the conclusion reached are short-sighted and biased

The conclusion is based on old evidence and the fact that Manston has not been able to prove to any extent past freight business. RSP's development is a new future challenging concept, which as the government is relying on technology to get us out of Brexit and Climate Change issues, is forward looking and much needed.

This report is stagnant relying on old issues and inconclusive Data. Jennifer Dawes' has relied too much on past evidenced material from York Aviation which in my opinion is wrong.

Linda James
