

To: Secretary of State for Transport  
% Planning Inspectorate,  
National Infrastructure Planning

Date: 3 December 2021

Our Ref: SoS/R/038

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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 the submission of David Foley on behalf of Thanet & East Kent Chamber and Dover District Chamber of Commerce [[TR020002-005808](#)].

**In response to paragraph 3.2 of David Foley [[TR020002-005808](#)],**

4. David Foley [[TR020002-005808](#)] made a number of assertions without providing any evidence and a number of factual inaccuracies - for example:
  - a. The [Thanet District Council Local Impact Report](#) does not fully back the Proposed Development at Page 57.
  - b. Ramsgate Town Council was democratically elected and does speak for the people of Ramsgate.
  - c. David Foley [[TR020002-005808](#)] views the changed circumstances of the last year as "*further evidence of the need to return Manston to the role for which it was built over 100 years ago*". With all due respect Manston airfield was a frontline airfield in defence of Britain in 1917<sup>1</sup> and we

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<sup>1</sup> [REDACTED] (accessed 3 December 2021)

cannot see how this fits with the Proposed Development. It would and did fit with the previous owners' plans for a heritage runway<sup>2</sup> so perhaps there is some confusion there with the previous planning application for the site.

- d. We respectfully remind the Secretary of State and David Foley that at the Transport Committee on 21 September 2021 in response to a question from the Chair as to whether [Heathrow was] still looking at a third runway for Heathrow?

**John Holland-Kaye** (Chief Executive Officer, Heathrow Airport) responded: *“Yes, absolutely. It is not just for Heathrow; it is for the UK. If we want to provide the benefits we have talked about, connecting all of Britain to global growth, **providing the capacity for cargo as well as for passengers—we need an expanded hub airport.** That is the only way we can take the battle to Paris, Frankfurt and Schiphol. **Parliament voted for that a few years ago. We have paused that, of course, during the pandemic but we will be getting back onto that as soon as we can**”<sup>3</sup>. Bold added for emphasis)*

**Generally in response to paragraphs 3.2; 4.6; 4.7 and 4.8 of David Foley [TR020002-005808]**

5. We respectfully note that there has been no evidence provided to support these assertions.

**In response to paragraph 4.3 of David Foley [TR020002-005808],**

6. We respectfully refer to our submission to the Second Consultation specifically:
  - a. SoS/R/023 Pages 8-12;
  - b. SoS/R/023B Pages 1-7;
  - c. SoS/R/023C Pages 1-3
  - d. SoS/R/024 Pages 6-8

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<sup>2</sup> [REDACTED] (accessed 3 December 2021)

<sup>3</sup> Q55 Transport Select Committee Oral evidence: Airlines and airports: supporting recovery of the UK aviation sector, HC 683 Tuesday 21 September 2021 Ordered by the House of Commons to be published on 21 September 2021. Available online at: [REDACTED] (accessed 19 November 2021)

e. SoS/R/028 Pages 20-25

**In response to paragraph 4.4 of David Foley [TR020002-005808],**

7. We respectfully refer to our submission to the Second Consultation specifically SoS/R/024 Pages 1-5

**In response to paragraph 4.6 and 4.8 of David Foley [TR020002-005808]**

8. We respectfully refer to our submission to the Second Consultation specifically SoS/R/020 Pages 1-17

**In response to paragraph 5.1 of David Foley [TR020002-005808]**

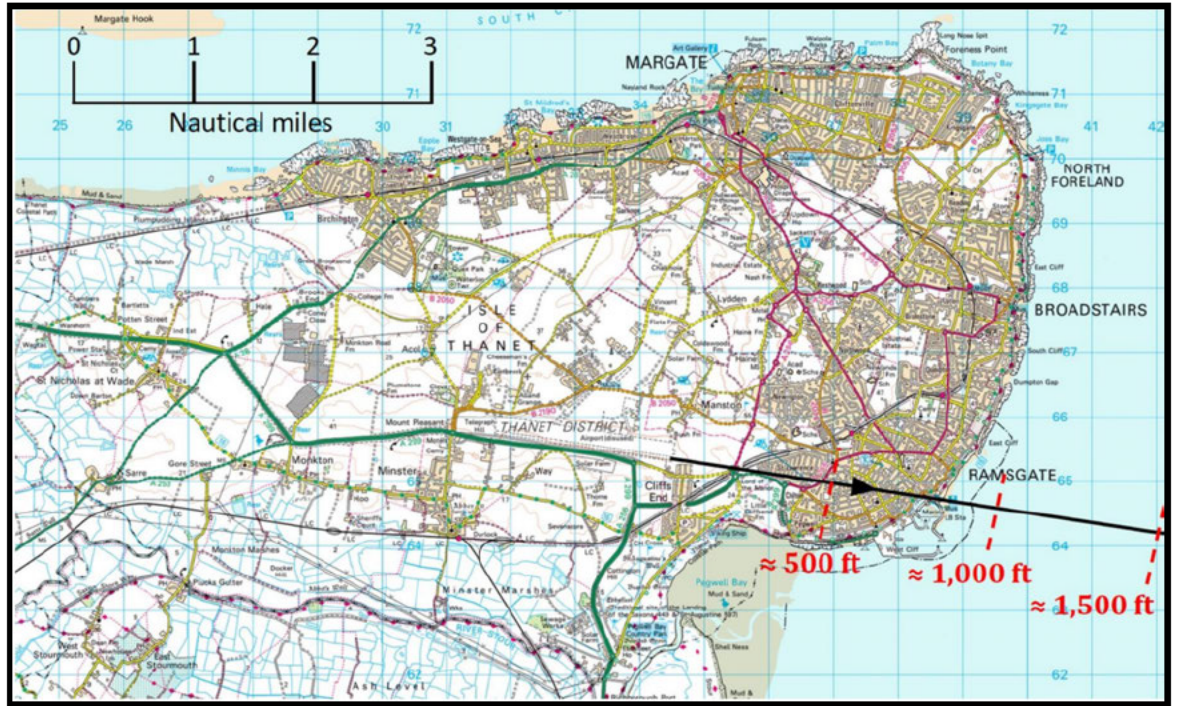
9. We would remind the Secretary of State and David Foley that the Applicant published on the Civil Aviation Authority website earlier this year of the altitudes of planes that the planes would actually be flying at over Ramsgate to and from the Proposed Development<sup>4</sup>.

If the DCO and airspace were granted, very large cargo planes would fly overhead at a height of 250 feet to 750 feet every 10/15 minutes over residential, green and open spaces, religious, medical, cultural, heritage, educational, retail, hospitality, industry and tourism providers and facilities. Please see the Applicant's map below.

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<sup>4</sup> Applicant's submission to the Civil Aviation Authority known as Aviation Workshop Presentation at Page 11 uploaded to the public on 12 March 2021 Available online at:

[REDACTED] (accessed on 3 December 2021)



**In response to paragraphs 5.2 of David Foley [TR020002-005808]**

10. We respectfully remind the Secretary of State and David Foley that the CAA and the Government are working on the airspace modernisation plan<sup>5</sup>.

**Generally in response to Paragraphs 5 and 6 of David Foley [TR020002-005808]**

11. We respectfully note that there has been no evidence provided to support these assertions.
12. Clearly for any local people to use airport-related skills in any future job opportunities, the Proposed Development must show sustained economic viability which is predicated on market need.
13. As you will be aware, since the Examination 4 independent experts agree there is **no need for the Proposed Development** as evidenced in:
  - a. [ExA recommendation Report](#).
  - b. [Independent Aviation Assessor Report](#)

<sup>5</sup>

(accessed 3 December 2021)

c. [Ramsgate Town Council's independent aviation expert's report](#)

d. [Jenny Dawes' independent aviation expert's report](#)

14. We respectfully opine that in light of submissions to the 2nd Consultation particularly of Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert, that the Secretary of State's [Independent Aviation Assessor Report](#) Conclusion will remain unchanged.