

## **SUBMISSION FROM COMMUTERS AGAINST THE CARGO HUB. 3<sup>rd</sup> December 2021**

I write on behalf of Commuters Against The Cargo Hub in response to yet another request for public submissions about the DCO for Manston Airport.

All the evidence points to Manston being a dead donkey of a development which can only survive if it can quickly steal business from long-established, better-located airports. The re-opening of the airport will also put pressure on the UK's carbon budget at a time when the government is now legally obliged to reduce it.

The airport has made more money as a post-Brexit lorry park than it ever did in its time as a commercial airport, during which it lost over £100million.

So, what is really going on here? Many of those who have been monitoring the cargo hub development DCO application are legitimately asking:

- Why is the SOS supporting a development which, according to the planning inspectors report, is not needed and will "have a material impact on "the ability of Government to meet its carbon reduction targets, including carbon budgets"?"
- Why is the SOS ignoring the conclusions of not one, but 16 aviation expert reports which say the airport is not/never will be viable?
- Why is the SOS heeding the advice of an Applicant whose company director is a serial failure when it comes to developing airports?
- Why is the SOS blocking the use of a huge brownfield site at a time when the govt are actively pushing to protect the UK's greenbelt from housing development?
- Why is the SOS using £8.5m of public money to compensate an airport developer that doesn't have planning permission?

In 2019, at the outset of the DCO process, the Applicant worryingly boasted that the outcome was "*a slam dunk.*" The Right Honourable Grant Shapps had already made his position clear as far back as 2014 when he was photographed shoulder-to-shoulder with Save Manston Airport campaigners in front of a sign which read KEEP CALM AND TRUST RIVEROAK.

Well-documented submissions to this DCO process have already outlined why Riveroak Strategic Partners (RSP) should not be trusted: primarily the business failures and publicly-disgraced history of RSP's leading director, Tony Freudmann.

On 09/07/20 the secretary of State, granted a DCO for Manston Airport to be developed as a cargo airport, against the advice of a Planning Inspectorate who had spent two years thoroughly investigating the airport's viability.

On 15/07/20 Craig Mackinlay, MP for South Thanet, stood up in Parliament and asked the Govt for a £17m top up to build a new parkway railway station less than half a mile from Manston Airport.

Said Mackinlay: *"There is a sense of great celebration in Thanet and east Kent with the positive development consent order for Manston airport, allowing that asset to fly once more, but we have one part of the jigsaw puzzle to solve—Thanet Parkway station. It was deemed desirable before the DCO; it now has to be deemed as essential."*

The Thanet Parkway development was granted the £17m towards a final build of £34m.

Meanwhile Manston Airport was temporarily turned into a post-Brexit lorry park. Freedom Of Information requests show that the Applicant was given £8.5m by the DfT, in part, for *"condensing their planned programme of works to develop the site back into a commercial airport."* In other words, RSP were being compensated for delays to the development they – subsequently – didn't have planning permission to proceed on.

How this £8.5m figure was arrived at is not clarified. However, what is clear is that there is no mechanism in any planning process which provides compensation for developers for delays. It is considered part of the overall risk. The £8.5 million compensation represents over half the £16.5m figure RSP paid to buy the airport.

Once again, what is going on here? And why is the tax payer footing the bill?

In court the DCO was quashed, with the SOS admitting that he "did not give adequate and intelligible reasons" for going against his own Planning Inspectorate's advice. The SOS decision also went against the advice of 16 aviation expert reports (see list below) produced over the last decade which have deemed the airport unviable for the very simple reason that geographically it's in the wrong place.

The latest report on the Manston Airport development came on 21/10/21 from Ove Arup, who were commissioned by the SOS to independently assess the original Planning Inspectorate DCO decision but only from the perspective of Need. Conspicuously the SOS failed to ask for anything else to be reviewed, including climate impact.

Ove Arup agreed with the original recommendation that the airport is not needed, saying: *"The ExA Report provides a robust assessment of the evidence available at the time the Examination was held and the conclusions drawn are considered to be sound."*

Ove Arup added: *"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 "*

It concluded: *"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"*

Ove Arup is part of a multinational professional services firm which provides design, engineering, architecture, planning, and global advisory services across every aspect of the built environment, including airports. The firm employs 16,000 staff in over 90 offices across 35 countries around the world

The key report in favour of developing Manston Airport is by Azimuth Associates, who were commissioned by the DCO Applicant, RSP.

Azimuth Associates is the trading name of its one full-time employee, Dr Sally Dixon. Under questioning at the Planning Inspection Dr Dixon admitted that the report she had produced was *"a forecast in terms of ATMs and tonnage. Whether that was viable is not part of the Azimuth Report."*

In short, Azimuth Associates (aka Dr Sally Dixon), refused to commit to concluding that a cargo airport at Manston was actually workable. The Planning Inspectors queried the validity of the Azimuth report, noting it was full of interviewees who *"appeared to be local businesses of limited size or pro-business organisations for Kent."*

The Planning Inspectors added: *"... there is little evidence that academic and industry experts have validated the approach of the Azimuth Report. Furthermore, there is little evidence that capacity available elsewhere such as at East Midlands Airport, or the*

*impact of the proposed Northwest Runway at Heathrow have been taken into account in the production of the forecasts."*

Dr Dixon was formerly Head Of Strategic Information at PlaneStation, a company that had previously owned Manston. Dr Dixon's Linked In page says she was "*Heavily involved in master planning for Kent International Airport Manston.*" RSP director Tony Freudmann's Linked-in account shows he was PlaneStation's Senior Vice President at the time. In 2002 PlaneStation recorded a pre-tax loss of £13million. The company eventually folded with debts of £73m.

This does not portray a particularly credible background of aviation development expertise.

The construction of the Thanet Parkway Railway Station is now well under way. However, there is one major flaw in Mr Mackinlay's Manston jigsaw: the £34m development which was built to support the proposed cargo airport development has no freight handling facilities. RSP's director Tony Freudmann, recently admitted on local radio that his company were not consulted on the Parkway Station plans.

This demonstrates that Manston Airport is not the Nationally Significant Infrastructure Project that the Applicant claims it is.

This becomes even more of a glaring oversight when viewed in the light of the govt's July 2021 report **Decarbonising Transport: A Better, Greener Britain** . The report says that the biggest contributor to greenhouse gases in the UK is transport and that the vast majority of freight is moved by vehicles on our roads.

As noted in our previous submission (09/07/21), the development of Manston could generate up to 597, 120 extra road traffic movements on the UK's roads. These vehicles would be HGVs moving not only cargo but also aviation fuel as Manston is not served by a fuel pipeline.

In the 2021 **Decarbonising Transport** report the govt makes the following commitment: "*We will support and encourage modal shift of freight from road to more sustainable alternatives, such as rail, cargo bike and inland waterways* "

As Thanet Parkway Station has not been designed to take cargo, the nearest freight railway stations to Manston are 55 miles up the M2 at Ebbsfleet or 40 miles across

country at Ashford. As such, Manston Airport doesn't adhere to the gov't's commitment to decarbonise transport in the UK.

**The Sixth Carbon Budget** now means that aviation carbon emissions can no longer be ignored. The 2021 **Decarbonising Transport** report admits that *"Decarbonising aviation is one of the biggest challenges across the global economy. The technological requirements to provide the power to propel aircraft the distances required far outstrip those for equivalent land-based transport."*

The 2021 **Jet Zero** report is highly speculative and relies on technologies that either don't yet exist or haven't yet been fully developed. The report itself admits: *"There is significant uncertainty surrounding the abatement potential, uptake and costs of the measures described in this document and therefore these scenarios should be seen as illustrative pathways rather than forecasts."*

**Jet Zero's** proposals would also allow UK aviation emissions to *increase* up to 2030 from 2019 levels which goes against the Climate Change Committee recommendations

Since COP26 the UK Govt has committed to cut emissions by 68% by 2030, and 78% by 2035 . The Climate Change Committee has warned that the Government does not have all the policies in place to deliver on these goals, and needs more action to curb emissions from areas such as flying.

In June 2021, the Climate Change Committee's Progress Report to Parliament warned: *"There should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory and can accommodate the additional demand."*

In conclusion, aviation evidence stacks heavily against the viability of successfully developing Manston as a cargo airport. And the UK's climate change commitments cannot justify planning permission to re-open an airport which operates a cargo-first business model with no rail-freight transport or fuel supply infrastructure.

Nothing has changed. Manston is still in the wrong place. It's still not needed. It will still have a negative impact on the UK's climate change obligations. Just ask the experts.

*TR Fennell on behalf of Commuters Against The Cargo Hub 03/12/21*



*Grant Shapps in 2014 meeting Save Manston Airport protestors. The cropped sign behind reads KEEP CALM AND TRUST RIVEROAK. On his right, in red top, is Jo Gideon, now MP for Stoke On Trent. She is the cousin of Riveroak director Tony Freudmann*

**FULL LIST OF AVIATION EXPERT REPORTS FROM THE LAST 11 YEARS WHICH CONCLUDE MANSTON IS NOT A VIABLE AIRPORT**

- 2010** BICKERDICKE ALLEN PARTNERS report night noise assessment
- 2011** YORK AVIATION Economic impact of night flying policy
- 2011** BICKERDIKE ALLEN PARTNERS noise
- 2014** FALCON report
- 2015** KCC position statement on Manston Airport
- 2016** TDC final report for Thanet District Council (TDC) Manston Airport Viability
- 2016** AVIA SOLUTIONS Riveroak response TDC Manston Airport viability final
- 2017** AVIA SOLUTIONS local plan representations review final
- 2017** AVIA SOLUTIONS analysis of report by Azimuth/Northwood on Manston
- 2017** YORK AVIATION for Stone Hill Park summery report final
- 2018** ALTITUDE AVIATION report
- 2019** ALTITUDE AVIATION report update
- 2019** DCO Examiners recommending refusal of DCO on many issues including need
- 2021** YORK AVIATION for Jenny Dawes in redetermination of DCO
- 2021** ALAN STRATFORD ASSOCIATES for Ramsgate town council
- 2021** OVE ARUP for DfT/SoS