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

Date: 3 December 2021
Our Ref: SoS/R/031

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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 7.
2. We submit our comment to the First Round of Consultation herewith as a formal consultation response to the Second Round of Consultation.
3. Airport infrastructure will need to change to accommodate alternatively fuelled aircraft. Such infrastructure will include hydrogen fuelling facilities or electrical charging points. It may also include additional space to accommodate the operational requirements of different approaches to aircraft fuelling. Significant planning and investment will be required to plan and provide the required infrastructure.
4. To date, the Applicant has not submitted any such changes to its application since it was received by the Planning Inspectorate in April 2018.
5. This is of particular importance to this application because as the Applicant stated in its NSIP Justification document ¹ at paragraph 13:
*"A fuel farm: although other airports may be able to provide air cargo transport services without a fuel farm, because the **Manston Airport runway is above an aquifer**, the Environment Agency **has ruled out direct fuelling of aircraft from tankers** as this would increase the risk of contamination of the aquifer to an*

¹ [TR020002-002382] NSIP JUSTIFICATION

unacceptable level and thus a fuel farm is a necessary element of air cargo transport services. The EA has **ruled out the fuel farm being constructed underground for the same reason**. A fuel farm would require planning permission and there would be no ability to provide air cargo transport services without it". (bold added for emphasis).

6. For the avoidance of any doubt the Proposed Development is not on the fuel pipeline and in addition it is not near any gas vehicle hubs.

