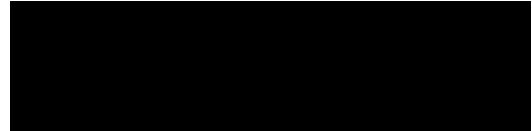


Five10Twelve Ltd
Marlowe Innovation Centre
Marlowe Way, Ramsgate CT12 6FA



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

Date: 24 March 2022
Our Ref: Manston Skills

Email: manstonairport@planninginspectorate.gov.uk;

Background

- A. As advised on 17 January 2022 by email by the Planning Inspectorate we submitted re-determination correspondence with comments and new evidence in relation to the Manston Airport DCO application (the "**Proposed Development**") dated 3 February 2022.
- B. On 11 March 2022, the Secretary of State issued a letter and at paragraph 11 stated that Interested Parties who have submitted re-determination correspondence with any comments that they wish the Secretary of State to treat as formal consultation response should re-submit these comments by 28 March 2022.
- C. Accordingly, we re-submit part of our re-determination correspondence with comments dated 3 February 2022 as amended herewith as a **formal consultation response** to the Secretary of State.

Formal Consultation Response to the Secretary of State

Little or No Weight Can be Given to the Skills Forecasting Report

D. As part of its Second Consultation submission, the Applicant introduced new evidence on skills including a Skills Needs Forecasting Report¹ (“**Skills Forecasting Report**”).

E. Little or no weight can be given to the Skills Forecasting Report on the following basis:

- a. Whilst the cover date of the Skills Forecasting Report is 3 December 2021, which suggests this is new evidence, page 15 of the Skills Forecasting Report² shows the authored date of 1 October 2019.
- b. It is significant that the authored date of the Skills Forecasting Report (1 October 2019) and its conclusions is pre-Covid and therefore does not take into account any changes in the employment landscape since the pandemic.
- c. The Skills Forecasting Report has not been submitted on any previous round of consultation and has therefore not been available for comment or critique by other parties or skills professionals.
- d. It does not appear that any CVs or credentials have been provided for the authors of the Skills Forecasting Report, Steve Matthews and Dr Jonathan Pratt, with the report merely listing their names on Page 15.
- e. The evidence base for the entire report is stated at paragraph 1 of Page 1 of the Skills Forecasting Report:

“The report is based on a workshop held with RiverOak and its aviation consultants to build a ‘bottom up’ model of employment on site, setting out the type of employers that are expected and the type and number of jobs that go with them; analysis of a range of employment and skills quantitative data sets to model occupations and skills associated with the types of employer identified; and depth interviews with experts and specialists in the field and desk research to build a more detailed picture of skills demand”.

¹

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006146-5.1%20Manston%20Skills%20Needs%20Forecasting%20Report%20October%202019%20-%20TR020002_RED2_SNFR.pdf

² *Ibid*

- f. Page 23, Annex 2 of the Skills Forecasting Report lists the participants of the workshop and “depth” interviews on which the entire report is based.
- g. It is significant that Annex 2 of the Skills Forecasting Report lists a total of only **nine participants** in the research through interviews and workshop, only one of whom (SmartLynx Airlines) is in any way representative of the type of logistics companies, airlines, freight forwarders, integrators or other businesses who the Applicant seeks to attract or who are featured in the Skills Forecasting Report. Information available in the public domain (LinkedIn) regarding the individual listed as participating on behalf of SmartLynx, Thorir Kristinsson, shows that Mr Kristinsson was not employed by SmartLynx at the time that the Skills Forecasting Report was drafted, having left the organisation three years earlier in 2016³.
- h. Of the eight remaining participants in the research for the Skills Forecasting Report includes:
 - i. Tony Freudmann, founding Director of the Applicant, RSP.
 - ii. Sally Dixon, author of the Azimuth Report, upon which the Applicant's business case and application is based. Azimuth is listed on RSP's website as being a member of the Applicant's Strategic Team⁴.
 - iii. Two consultants who have been directly engaged by the Applicant on a contracted basis and who have previously submitted evidence during the Examination, (Rich Connelly, Osprey Consulting Services, and Tom Wilson, Viscount Aviation). Both Osprey and Viscount are listed on RSP's website as being members of the Applicant's Professional Team⁵.
 - iv. One small helicopter business (Polar) and one engineering company (Avman), both of which currently operate from the Manston site, apparently without any need for the development and with a combined employee headcount of 14 people across the two businesses according to most recently filed accounts at

Companies House.

- i. Therefore the weight that can be placed on the Applicant's skills forecasts must be significantly reduced by the:
 - i. lack of interview transcripts;
 - ii. statistically insignificant number of interviewees (nine);
 - iii. lack of independence and co-dependency of 89% of the interviewees;
 - iv. concern as to the validity of 1 of the interviewees; and
 - v. size and sample frame of the interviewees.
- j. Further, when considering the size and type of the forecasts there is no evidence that academic and industry experts have validated the approach of the authors or even that the authors have the appropriate credentials to undertake this type of work.
- k. Pages 16-22, Annex 1 of the Skills Forecasting Report⁶ provides no citation of sources.

Little or No Weight Can be Given to the Skills Need Report

- F. The above Skills Forecasting Report also formed the foundation of a Skills Need Report⁷ ("**Skills Need Report**") prepared by Azimuth in May 2021 and also submitted during the Second Consultation, with no opportunity for review or challenge.
- G. The weight that can be placed on the Applicant's skills need report must be significantly reduced by the:
 - a. dependency on the fragile and inadequate Skills Forecasting Report (which we have shown above at paragraph E(a-k) to be not robust) which formed the foundation of the Skills Need Report;

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https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006146-5.1%20Manston%20Skills%20Needs%20Forecasting%20Report%20October%202019%20-%20TR020002_RED2_SNFR.pdf

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https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006147-6.1%20Manston%20Airport%20Skills%20Need%20Report%20May%202021%20-%20TR020002_RED2_SNR.pdf

- b. credentials for the author of the Skills Need Report, Sally Dixon, have not been provided, although we note that she has previously been presented by the Applicant as its aviation consultant⁸;
 - c. dependency throughout the document and on the recalculated total employee numbers - supplied by Steve Matthews - through the Skills Forecasting Report (which we have shown above at paragraph E(a-k) to be not robust);
 - d. employee numbers have been counted for numerous functions and roles that are not in any way related to the Applicant's original DCO Application or any reasonable or realistic cargo airport operation located, for example jobs relating solely to marine businesses and wind farms have been included; and
 - e. there is no evidence that academic and industry experts have validated the approach of the author or even that the author has the appropriate credentials to undertake this type of work.
- H. As previously evidenced in the First and Second Consultation⁹ - and as made clear through the list of participants in the Skills Forecasting Report - it is clear that the Applicant is an outlier in terms of local and regional skills strategy, with no engagement or involvement in existing or developing skills strategies developed by either Thanet District Council, Kent County Council or the South East Local Enterprise Partnership (SELEP). This is highly unusual for any developing or proposed Nationally Significant Infrastructure Project.

█ [REDACTED]

⁹ Pages 3, 16-20

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006038-163%20-%20Five10Twelve%20Ltd.pdf>

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006178-283%20-%20Five10Twelve%20Ltd.pdf>

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006048-173%20-%20Five10Twelve%20Ltd.pdf>

Page 12-14

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006240-345%20-%20Five10Twelve%20Ltd.pdf>

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<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005656-014.pdf>