



By email only to manston@communityrelations.co.uk

July 12th 2017

Manston Airport – 2017 Consultation

We are grateful for the opportunity to comment on the RiverOak Strategic Partnership's (RSP) Manston Consultation. These comments have been agreed by the Transport specialist sub-committee of CPRE Kent, the Kent Branch of the Campaign to Protect Rural England, an independent charity within the national CPRE umbrella. Throughout Kent we represent 2,330 individual members, 144 Town or Parish Councils and 37 local amenity groups and civic societies. CPRE exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country for the benefit of all.

Question 1 To what extent do you agree or disagree with our proposals for Manston Airport?

CPRE Kent does not support the use of Manston as a freight hub. We consider that the environmental and social impacts of noise and air pollution outweigh the claimed economic benefits. In contrast, the opportunity to convert this brownfield site to the mixed commercial and residential use proposed by its current owners offers more realistic employment opportunities and provides for the prospect of safeguarding the best and most versatile agricultural land which would otherwise be required to meet Thanet's objectively assessed housing need.

We are concerned additionally with the potential for airspace conflicts, as the skies over Kent accommodate a huge number of flights between Europe and the UK/Ireland, as well as some *en route* to America and countries north of the UK.

Question 2 Do you have any comments on our Outline Business Case for reopening Manston Airport?

We have examined the economic case put forward and consider that the projections of economic and employment growth are at best questionable.

The consultation documents contain ambitious forecasts for the growth of air freight, but these exclude any real monetisation of the negative environmental and social impacts of air freight and the factors inherent in meeting the UK's legally binding climate change targets. Aviation has the

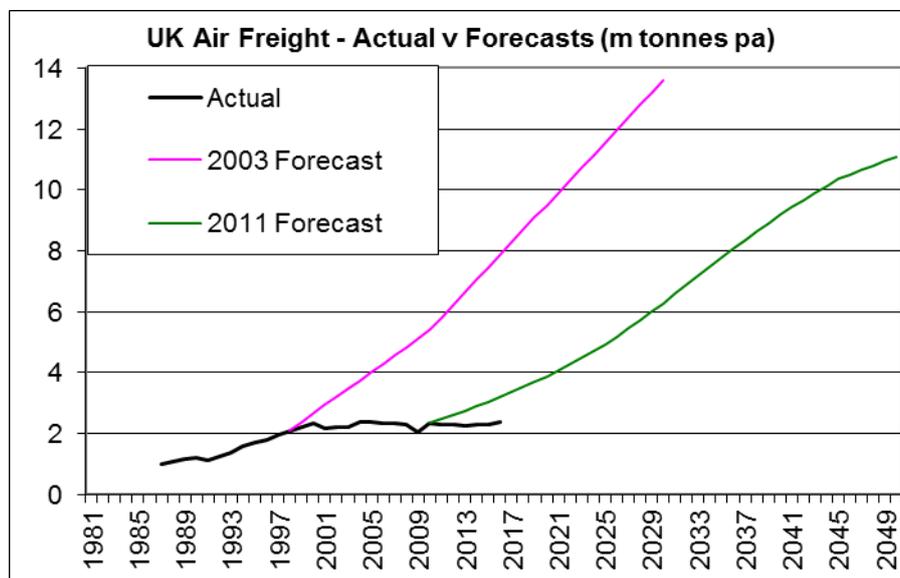
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greatest climate-change impact of any mode of transport and modal shift to rail would have far less impact.

Furthermore, the projections for the growth in trade are thrown into question when considering the DfT Aviation forecasts against the actual performance (see graph). We note that the annual tonnage of air freight has stayed steady for two decades at around 2 million tonnes per annum, and we can see no reason why this should change significantly. The DfT 2013 forecast for Freight Air Transport Movements (ATMs) show their forecast 11m tonnes/pa for 2050 being accommodated on 60,000 ATMs – only slightly more than current ATMs: DfT consider that any increase in tonnage could be easily be accommodated by the same number of flights.



Source: CAA & DfT Statistics and DfT Forecasts

There are considerable uncertainties surrounding possible post-Brexit trade deals and the prospect of securing sufficient export contracts to make sure that planes depart, as well as land, full of cargo. We are particularly concerned that, should sub-optimal loading factors prove to make the operation less viable than projected, there would be overwhelming pressure to schedule more night flights to attract the trade that is restricted from using other airports at night.

Question 3 Do you have any comments or suggestions about how we could maximise the social and economic benefits of reopening Manston Airport?

We do not think a new airport here would provide any overall social or economic benefits, and the danger of converting the site into an airport is that is highly unlikely to be viable, and would therefore again become a blight on the area, and retard the more useful, and economically and socially beneficial uses for another decade.

Question 4 Do you have any suggestions about how we could support the Spitfire & Hurricane Memorial Museum and the RAF Manston History Museum?

No.

Question 5 Do you have any comments or suggestions about the potential impacts of the Project and our proposals to limit them?

We question the likelihood of the majority of flights approaching from the west when prevailing winds do not facilitate this. Other than in light winds, pilots will always prefer to land into a headwind rather than a tailwind in the interests of safety. This means that the majority of aircraft approaches will be from the east, causing significant disturbance to the major conurbation of Ramsgate. For take-offs, Herne Bay, the World Heritage sites in Canterbury, and the quiet rural areas and SSSIs north of Canterbury, as well as the AONB from Dover to Rochester, would be adversely affected.

The impacts of surface transport as the result of establishing a freight hub at Manston are also of significant concern to us. Unlike the main UK airports, Manston is not connected to the national fuel pipeline system, so all aviation fuel would need to be delivered by road.

Furthermore the negative impacts on Kent's wider economy do not appear to have been considered. The predominance of fruit and vegetable imports proposed here is at odds with Kent's role as the 'Garden of England'.

The surface traffic generated by use of Manston as a freight hub is difficult to assess, although likely to be significant. The projected throughput for Manston of 341,000 tonnes of freight by 2040 could, at maximum efficiency, be handled by around 13,500 HGVs with 25 tonne capacity, but in reality will require very many more vehicle movements. Return loads will, we believe, be the exception rather than the rule, and if the main import is produce, then volume rather than weight determines the achievable payload, and with perishable products the opportunities for load consolidation will be limited.

Question 6 Do you have any comments on the possibility for limited night flights at Manston Airport?

We consider the impacts of night flights entirely unacceptable. The Aviation Environment Federation has identified¹ that aircraft noise can no longer be considered simply as an inconvenience, but has severe negative effects on people's health and quality of life, and night noise has even greater effects. Exposure to aircraft noise can lead to short-term responses such as sleep disturbance, annoyance, and impairment of learning in children, and long-term exposure is associated with increased risk of high blood pressure, heart disease, heart attack, stroke, dementia, and may contribute to long-term mental health issues. The AEF report also finds that in

¹ <http://www.aef.org.uk/2016/01/12/new-report-finds-aircraft-noise-policies-put-the-health-of-over-one-million-people-at-risk/>

the UK, over one million people are exposed to aircraft noise above levels recommended for the protection of health, estimated to cost £540 million each year.

Question 7 Do you have any other comments about our proposals for re-opening Manston Airport?

Manston's peripheral location in the east of the county makes it a questionable choice for a freight hub. The surface traffic that will convey goods to and from the airport will impact hugely on road networks that are already under strain from the predominantly road-based freight that uses the channel crossings. The UK's trade links rely disproportionately heavily on the channel routes, and the experience of the lengthy implementation of Operation Stack in 2015 demonstrated clearly the lack of resilience of these narrow and highly congested trade corridors.

In terms of air passengers, again geography shows a lack of potential customers: Kent has a population of 1.6 million people, fewer than half of whom fly, and many better connections to other established airports which already have a wide range of destinations.

In the interest of national resilience, any major expansion of air freight should be concentrated much closer to the 'Golden Triangle' logistics foci in the Midlands. We note that the suite of consultation documents indicates that freight operators 'prefer' to fly in and out of the south east, but there are very good spatial planning reasons to disperse that growth.