

*“Manston Airport: a national and regional aviation asset.
Volume II: A qualitative study of potential demand”*

July 2018

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NNF07 - a critique by No Night Flights

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Introduction

1. The Planning Act 2008 sets out the criteria by which the Planning Inspectorate must assess any application for a Development Consent Order (DCO) for a Nationally Significant Infrastructure Project (NSIP). The key criterion for RSP's (RiverOak Strategic Partners) potential DCO application is that RSP's project should be "*expected to have the effect*" of increasing "*by at least 10,000 per year the number of air transport movements of cargo aircraft for which the airport is capable of providing air cargo transport services*"¹
2. In making its case, RSP relies entirely and exclusively on the work of Dr Dixon. Dr Dixon's work is therefore critical to RSP's case.
3. This document is a critique by No Night Flights of the **second** volume of Dr Dixon's work. We show that Dr Dixon has disregarded accepted air freight forecasting methods in favour of an unrepresentative set of interviews. We also question Dr Dixon's rationale in the selection of the interviewees and demonstrate that she has failed to focus on the key players in the air freight market. Further, we draw attention to arbitrary and unexplained assertions throughout her report, which mean that little weight can be placed upon Azimuth's case for potential demand.
4. We appreciate that, in major projects, consultation responses by residents are often given less weight than the documentation presented by the developer. However, we have taken great pains to base our critiques on hard evidence. We have demonstrated conclusively that Dr Dixon's work is unsound. Given that, it would not be safe for the Planning Inspectorate to assume that our evidence can be given little weight.

The Dismissal of Freight Forecasting Models

5. Azimuth Volume II is the principal building block for the forecast of freighter movements shown in Azimuth Volume III.
6. The forecast number of freighter ATMs (Air Traffic Movements) determines whether the airport is "nationally significant", and thus determines whether the DCO application will be acceptable. Such forecasts underpin each phase of RSP's business plan, driving the requirements for aircraft stands, warehousing, truck parking, cargo handling, fuelling, and staffing. Further, it results in the claim that its plans will lead to the creation of 23,000 jobs.
7. Everything depends on freighter ATMs. Indeed, RSP's entire proposal can be thought of as an inverted pyramid, balanced on a single foundation stone - the forecast number of freighter ATMs. That forecast is shown in Azimuth III. But Azimuth II explains the underlying principles on which the forecasts are based.
8. Accordingly, the method by which Dr Dixon determines those forecasts is crucial to the forecasts' validity and credibility.

¹ Planning Act 2008 section 23 (5)(b)

9. In Azimuth II, Dr Dixon seeks to explain and justify the basis on which her forecasts in Azimuth III are compiled. Much of Azimuth II is devoted to describing how she rejected the so-called 'quantitative' forecasting method in favour of her 'qualitative' research method, for developing the RSP forecasts for Manston.
10. The Azimuth report describes the two different approaches, each of which can help predict future demand, in this case for air freight traffic forecasts.
11. The two approaches are:
 - Quantitative Forecasting, and
 - Qualitative Forecasting.
12. At this point it is worth explaining the two approaches:
 - **Quantitative forecasting** models are used to forecast future data as a function of past data. They are appropriate to use when past numerical data is available and when it is reasonable to assume that some of the patterns in the data are expected to continue into the future.
 - **Qualitative forecasting** techniques are subjective, based on the opinion and judgment of consumers, experts; they are appropriate when past data are not available.²
13. Dr Dixon summarises her justification for dismissing a quantitative approach in favour of a forecast based on 24 interviews with 'industry experts' in this paragraph from the Executive Summary in Azimuth Volume II:
14. *Findings from the literature review suggest a lack of datasets for freight forecasting, the unreliability of using historic data to predict the future, the inability to infer forecasts for individual airports from national figures, and the volatility in the freight sector. Academic and industry experts contacted through this research process confirmed these findings, validating the qualitative approach taken. The intention of the research was to uncover the drivers of demand for dedicated air freighter transport and provide a foundation for the forecast presented in Volume III. As such, the report provides qualitative information derived from 24 interviews with industry experts. These interviews and information from other sources identify potential demand for sectoral and geographic freight markets, passenger and other aviation opportunities.*
15. In her 'Review of air freight forecasting literature' (Vol II, Section 2), Dr Dixon describes twenty air transport forecasting models, all analytical quantitative models, used by, for example:
 - ACI – Airports Council International
 - The Airports Commission (UK)

² Wikipedia: Forecasting

- Boeing
- DfT – Department for Transport (UK)
- European Commission – various models including Eurocontrol
- IATA – International Air Transport Association
- ICAO - International Civil Aviation Organization and so on.

16. Dr Dixon explains, at para. 2.22.3:

17. *Whilst econometric models have been the forecasting method of choice by the DfT, Airports Commission and the EU, these are generally used to forecast passenger air traffic for a country or region. As the ACI says, “Any airport wishing to apply an econometric forecasting approach is advised to begin by examining its historic traffic and survey data” (ACI, 2011, p. 25). This suffices at country level or for established airports where the past can be used to predict behaviour in the future. However, in the case of Manston Airport, closed for several years and lacking investment for many more, this approach is not appropriate. Any attempt to build an econometric model would have to establish criteria whereby a proportion of the total predicted UK air freight traffic was ‘diverted’ to Manston. However, deciding upon the proportion to divert to Manston raises significant problems.*

18. At para. 2.22.4, she then concludes:

19. *Therefore, instead of providing a mathematical forecasting model, this review of the literature suggests a qualitative approach that aims to predict human and organisational behaviour. Indeed, the DfT (2014, p.3) place a heavy reliance on an understanding of human behaviour in achieving realistic outputs. A qualitative approach that gathers the opinions of industry experts would allow areas of potential demand for Manston Airport to be identified. It is this type of approach that has been selected in the case of Manston Airport.*

20. We are surprised that Dr Dixon has chosen to ignore the advice from Airports Council International (ACI) that “Any airport wishing to apply an econometric forecasting approach is advised to begin by examining its historic traffic and survey data”. She justifies this on the basis that Manston has been closed and lacked investment for many years before.

21. Manston has been closed since 2014. It was operational as an airport and in private hands for 15 years before that. The service and turnaround times were reported to be good, which casts some doubt on the picture of lack of investment put forward by Dr Dixon. Indeed, in 2003 the airport operator announced that its investment to date meant that Manston Airport was equipped to handle 250,000 tonnes of freight a year. RSP’s Mr Freudmann ought to be aware of this as he was part of that management team. All the flight figures, including for air freight traffic, whilst the airport was open, are readily available. We therefore wonder why

Dr Dixon has chosen a qualitative approach to forecasting rather than an analytical quantitative approach, based on known traffic data from Manston.

22. Others have arrived at a similar conclusion, questioning Dr Dixon's approach; viz. York Aviation: ³

23. *2.44 Volume II of Azimuth's work begins with an assessment of different forecasting approaches for cargo, noting that forecasting of cargo is not as well developed as that for passenger activity. We agree that air freight forecasting is difficult and that there is a lack of hard data. However, we do not agree with Azimuth's assertion that quantitative methods are, therefore, not suitable and that qualitative methods are more appropriate. The evidence cited by Azimuth at Table 3 ⁴ does not support this conclusion and suggests that causal methods (regression analysis) remain the most appropriate for forecasting demand for cargo and freighters. Such an approach is far more akin to the type of analysis undertaken by York Aviation in its work for TfL and FTA and upon which Azimuth seek to rely as a basis for the scale of activity that Manston might attract.*

24. And here are comments from Altitude Aviation: ⁵

25. *318. We disagree with the conclusion that a purely qualitative methodology is appropriate. While qualitative approaches can be useful, they are most robust as a complement to a quantitative approach. Furthermore, qualitative approaches are typically only adopted for relatively short term forecasts.*

26. *319. The issues with a purely qualitative approach in the context of Manston Airport are:*

- *Assumptions are subject to bias, lack transparency and are impossible to independently verify.*
- *Does not identify current market size for relevant segments.*
- *Forecasts do not reflect historic traffic patterns.*

27. Let us examine the approach that Dr Dixon has taken in her qualitative research.

The Motley Interviews

28. Having notionally justified the dismissal of mathematical quantitative techniques, Dr Dixon goes on to describe the qualitative forecasting approach that she has adopted. This comprises interviewing individuals she considers to be key industry experts with a view to applying her judgement and building a picture of the future, which in turn is used as a basis for forecasts of market demand.

29. Dr Dixon says 94 potential interviewees were approached and this resulted in 24 contacts (individuals and/or organisations), as shown in Table 3 of the Azimuth

³ York Aviation, November, 2017

⁴ Table 3 in Azimuth II January 2018 – Table 2 in Azimuth II July 2018

⁵ Altitude Aviation Advisory: "Analysis of the Freight Market Potential of a Reopened Manston Airport", January 2018

report, who were then interviewed in person, by telephone or by email. Details of the questions asked and some of the responses are shown in the Azimuth report.

30. In fact, very few representatives of the key players in the global air freight industry were interviewed by Dr Dixon.
31. The top ten cargo airlines are:

By freight tonne-kilometres flown (millions)⁶

<u>Rank</u>	<u>Airline</u>	<u>FTKs (2015)</u>
1	FedEx Express	16,020
2	Emirates SkyCargo	11,240
3	UPS Airlines	10,936
4	Cathay Pacific Cargo	9,464
5	Korean Air Cargo	8,079
6	Lufthansa Cargo	7,054
7	Singapore Airlines Cargo	6,019
8	Qatar Airways Cargo	5,997
9	Cargolux	5,753
10	China Airlines Cargo	5,266

32. The only representative from a company on this list interviewed by Dr Dixon is a Senior International Legal Adviser from FedEx Express. His advice, as reported at Para. 4.2.46, is that the benefits that integrators would look for from an airport would include:
- Excellent transport links by road and rail with connections to London and the rest of the UK
 - A location close to London, particularly to the east of London and the Canary Wharf commercial and business districts and with the ability to access the whole of London quickly so companies can compete globally
 - Sufficient runway length for larger cargo-only aircraft with available slots
 - Situated at the centre of a key UK regional economy.
33. This does not describe Manston, as it is located remotely in the toe of Kent, not at the heart of a regional economy and without easy access to the main markets in London and the rest of the UK. The FedEx advice is more suggestive of East Midlands and Stansted airports, both of which are far better located to access London and markets across the UK and both of which have significant spare dedicated freighter slots. As we reported in our critique of Azimuth Volume I, Stansted can handle another 10,000 cargo ATMs and 165,000 tonnes per annum. East Midlands can handle another 860,000 tonnes, estimated to equate to another

⁶ Wikipedia – Cargo airline

50,000 dedicated cargo ATMs per annum using the average tonnage per ATM at East Midlands.

34. Further, this quote from Azimuth II does not appear to support the selection of Manston as an ideal location:

35. *4.2.45 Integrators monopolise the freight-friendly airports such as East Midlands (DHL) and are reluctant to change their operations, preferring to cope with slot restrictions at Heathrow rather than moving to other more cost effective airports (DHL, FedEx). The explanation for this is the focus on associated fixed costs and the resources involved to make a move to another airport (FedEx).*

36. Of the 24 companies interviewed by Dr Dixon, we have analysed the frequency of their quotations in the Azimuth report. The higher the frequency might suggest those companies that have most influenced Dr Dixon in preparing her forecasts for Manston:

<u>Company Interviewed</u>	<u>Frequency of Quotes</u>
Coyne Airways	22
Active Transport	11
ACC Shipping	7
Taft International	5
White's Transport	4
Baltic Air Charter Association	2
Eurotunnel	2
Equinus Transport	1
Finlay's Horticulture	1

37. Coyne Airways (first place, quoted 22 times by Dr Dixon) is an all-cargo airline with a fleet of just four planes operating limited scheduled flights to the Middle East and Central Asia. According to Wikipedia, it is listed as 95th [sic] largest carrier in terms of freight tonne-kilometres.

38. Active Transport, ACC Shipping, Taft International and White's Transport are all small freight transport companies based in Kent and with previous connections to Manston. One might reasonably wonder how much weight could be attached to their views, or if any pro-Manston bias might creep into their world view.

39. Coyne Airways and the local hauliers represent 90% of the interview quotations in the Azimuth report.

40. The other organisations interviewed by Dr Dixon are a mix of i) international integrators (FedEx Express and DHL), ii) air charter and transport associations (Baltic, BIFA, CILT and FTA) and ii) local business and tourist promoters. However, from the interview quotations in the report, almost none of these can be seen to be making a strong case, or indeed any case at all, to support the reopening of Manston.

41. York Aviation's view, at Para.2.9: ⁷
42. *In some cases, throughout the remainder of Volume II, individuals are referred to who are not listed in Table 4 ⁸ and, in other cases, individuals or organisations are referred to in different terms to those listed in the table. This does not suggest a very robust or rigorous approach to setting out the potential for Manston. Although the framework of questions is set out at paragraph 4.3.1 ⁹, we are unable to identify any questions that would enable an assessment to be made of future passenger or freight volumes that would be likely to use Manston and which could be used as the basis for any forecast of future usage.*
43. Dr Dixon describes her research as 'a qualitative approach that gathers the opinions of industry experts'. However, the one significant player in the air freight market (FedEx Express) advising Dr Dixon that Manston is not the best place for a dedicated cargo airport (page 7 above); and both DHL and FedEx explaining the financial reasons why integrators are reluctant to move from their well-established airport bases (also page 7 above); leaving only the views of a handful of minor players and those with apparent interests in a future Manston re-opening.
44. York Aviation's conclusion, at 2.74
45. *In summary, Azimuth's insistence that Manston's past market performance is not a relevant consideration in understanding how it might perform in the future is both erroneous and contradictory to the evidence put forward to support the qualitative market forecasting approach. The interview findings presented are clearly focussed towards operators that have used Manston in the past and would be pleased to be able to use it again but the evidence presented does not suggest that operators would do more than reinstate past operations. This did not result in an airport that was viable and certainly did not result in annual cargo air transport movements predicted by Azimuth. In our view, and having regard to the evidence, it is unlikely that circumstances have changed so dramatically in the intervening period since the Airport was last operational that there is likely to have been a fundamental change in its ability to capture market share. Its previous cargo performance remains the best starting point from which to consider its future.*

The Peer Review Claims

46. We are told that the four volumes of the Azimuth reports for RSP were peer reviewed. We have seen no evidence of that, or, indeed, any comments arising from such peer review. There is no evidence of an independent review included with the four volumes of the Azimuth reports.
47. Further in the Executive Summary to this Volume II, Azimuth claims: "Academic and industry experts contacted through this research process confirmed these

⁷ York Aviation, November 2017

⁸ Table 4 in Azimuth II January 2018 – Table 3 in Azimuth II July 2018

⁹ Paragraph 3.3.1 in Azimuth II July 2018

findings (to justify the dismissal of a quantitative approach), validating the qualitative approach taken.” Again, there is no evidence or references to those academic and industry experts.

48. Thanet District Council (TDC), in seeking to establish whether viable airport operations could be re-instated on the Manston site, had commissioned two independent studies:
 - Falcon Consultancy – July 2014
 - AviaSolutions – September 2016
49. Following the use of previous reports from York Aviation as evidence to support Azimuth’s assertions, York Aviation issued a detailed report (November 2017) describing the use of its previous material by Azimuth as misleading and incorrect.
50. Furthermore, in its report ‘Analysis of the Freight Market Potential of a Reopened Manston Airport’, Altitude Aviation Advisory concluded: ¹⁰
51. *369. It is highly unlikely that a re-opened Manston could play any significant role in serving the needs of the UK air cargo industry. There is currently no shortage of overall capacity (beyond that identified specifically at Heathrow), and future demand growth into the long term can be met with planned expansion from the leading cargo airports in the UK.*
52. *370. Manston previously operated as a niche air freight airport. While it could theoretically regain this role in the future, its structural disadvantages (location, lack of critical mass, lack of passenger hub, night flight restrictions etc.) will severely limit its potential.*
53. *371. Our overall conclusion is that the RSP proposals and the Azimuth forecasts are deeply flawed. The outlook put forward by RSP / Azimuth does not reflect market realities. We would expect freight tonnage and freight ATM outturn at a reopened Manston to be considerably below the Azimuth forecasts. We see no realistic prospect that Manston could ever develop to reach the threshold required of a Nationally Significant Infrastructure Project, namely to increase cargo ATMs by at least 10,000/year compared to the existing capability.*
54. There have now been four independent reports – Falcon, AviaSolutions, York Aviation and Altitude Aviation – each of which has concluded that an airport at Manston cannot be viable, at least in the timescales to 2039, as envisaged by Azimuth.
55. RSP commissioned another study, from Northpoint Aviation.¹¹ However, that report relies heavily on the Azimuth work and, in our view, lacks credibility – see

¹⁰ Altitude Aviation Advisory: ‘Analysis of the Freight Market Potential of a Reopened Manston Airport’, January 2018

¹¹ Northpoint Aviation Services – ‘The Shortcomings of the Avia Solutions Report and an Overview of RSP’s Proposals for Airport Operation at Manston’ – undated.

NNF's critique of Northpoint's Report for RSP.¹² Also, the Northpoint Aviation study appears to have been quietly dropped by RSP and not included in its formal submission to the Planning Inspectorate.

56. RSP's complete case – for future aircraft operations, for its business and financial justifications, for its environmental impacts, for its justification of 'national significance' – all depends on the work of one person, the author of the Azimuth reports, Dr Sally Dixon.

The Arbitrary and Unexplained Assertions

57. Azimuth II is riddled with unexplained assertions, and numbers apparently picked from thin air.

In the Executive Summary

58. In Azimuth II's Executive Summary, Dr Dixon claims "The airport has an ideal airspace location; benefits from easy surface access to London and the rest of the UK; and can provide rapid handling and turnaround times for air freight."

59. *"an ideal airspace location"*

60. Dr Dixon does not clarify what makes Manston's airspace "ideal". Any benefit from the airspace presently being empty – because the airport is shut – would clearly be lost should the airport reopen. We note the comment in the DfT's report of the SERAS study:

61. *"Although there are no local airspace restrictions, Manston lies beneath some of the busiest cross channel airways giving access to Europe and so movements would need to share airspace capacity with heavy traffic flows to and from the main London airports."*¹³

62. *"benefits from easy surface access to London and the rest of the UK"*

63. In practice, this involves 25km of A299 before joining the M2. There is no analysis of how "easy" this will be when this route has to carry the additional load of HGVs resulting from filling, emptying and fuelling the thousands of additional freighters a year that RSP must deliver to meet the NSIP criterion.

64. *"can provide rapid handling and turnaround times for air freight"*

65. Dr Dixon refers to the rapid turnaround times that Manston has achieved when handling one or two planes a day. There is no evidence that this could be maintained at higher volumes – in fact, the longer turnaround times at other, busier, airports suggests that it can't.

66. The Executive Summary continues *"Evidence collected for this report suggests that a vast quantity of freight is already trucked to and from northern European*

¹² 'Northpoint Aviation's Report for RSP – a critique by No Night Flights' – October 2017.

¹³ SERAS Stage Two appraisal findings report – April 2002

airports, losing revenue for UK airports and increasing costs for all those in the supply chain.”

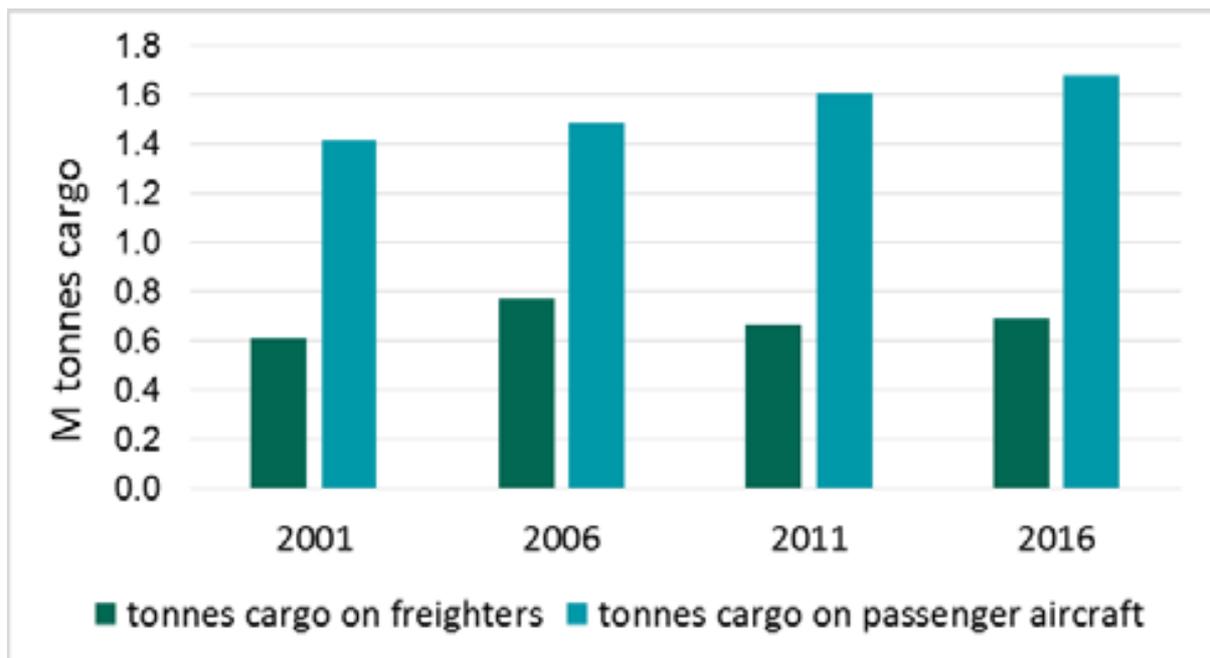
67. *“... suggests that a vast quantity of freight is already trucked to and from northern European airports”*
68. We agree that freight is trucked to and from northern European airports, but this may be because it is most economical to truck freight, relatively short distances, to and from hub airports where freight is then transported in the bellyhold of aircraft to the wide network of global passenger destinations.
69. *“... losing revenue for UK airports and increasing costs for all those in the supply chain.”*
70. We do not agree this is losing revenue for UK airports, since trucking to hub airports is the most economical solution. It seems fallacious to deduce the existence of a huge untapped market for Manston to capture.
71. *“Academic and industry experts contacted through this research process confirmed these findings, validating the qualitative approach taken.”*
72. As we are not provided any details of who such aviation and industry experts might be, nor their views, it is difficult to give any weight to this statement.

In the Body of the Report

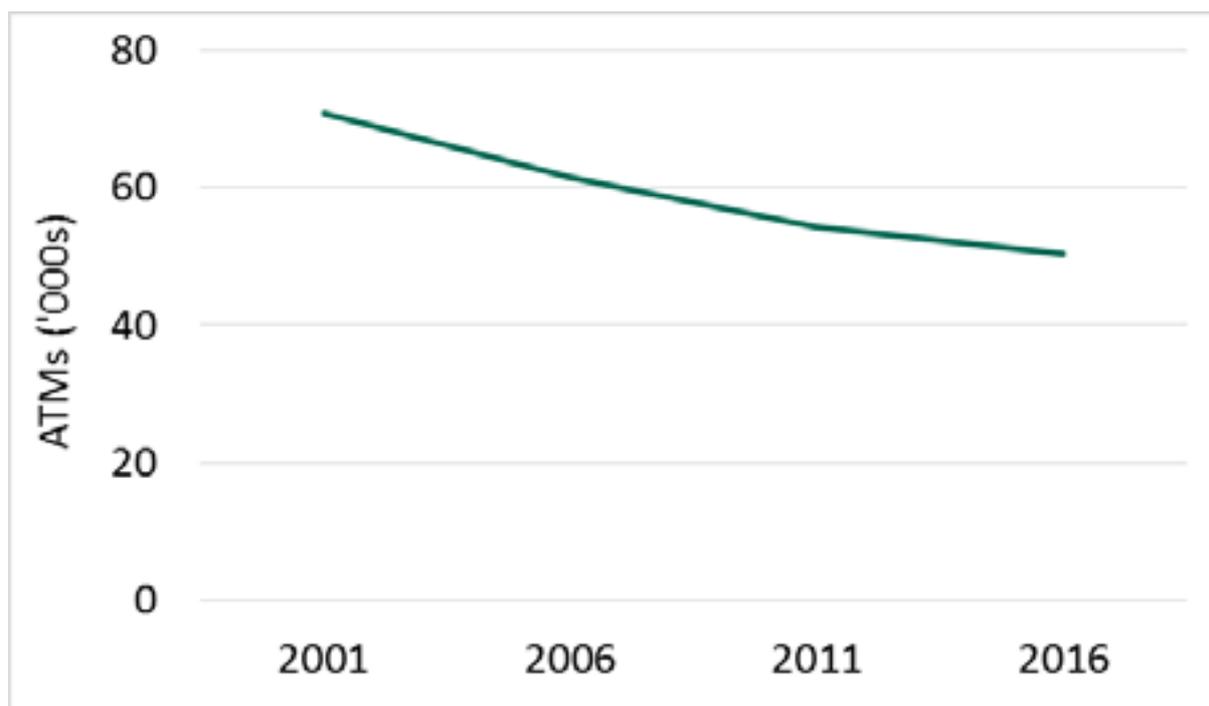
73. *“1.3.3 Key stakeholders have been invited to influence all aspects of the research and will continue to be able to monitor, assess and challenge the validity of the information produced ... ”*
74. Unfortunately, we are not privy to who those stakeholders might be who have been invited to influence all aspects of this research, so it is possible neither to assess their impact or to determine if this process might be expected to have added anything of substance to Dr Dixon’s approach.
75. *“2.2.8 In terms of a specific forecasting method, ACI-NA recommends the following activities (ACI-NA, 2013, pp. 16-20):*
- *Collect and analyse data*
 - *Current aviation industry and cargo trends*
 - *Catchment area socio-economic data*
 - *Historical air service and cargo traffic trends*
 - *Benchmarking against similar airport*
 - *Competitor analysis*
 - *Employ modelling technique*
 - *Use a market share forecast (if using data for a region or country)”*
76. This is one of the many examples of the analytical quantitative forecasting techniques that Dr Dixon explored, but rejected without clear justification.
77. *“2.6.4 The 2017 updated aviation demand forecasts (DfT, 2017, p. 33) confirms that freight is not modelled in detail. An assumption that the 2016 number of*

movements will remain unchanged has been used. Based on analysis of CAA figures, the DfT found that:

- 78. *“Total freight carried at the UK airports in the department's model rose from 2.9 million tonnes in 2011 to 3.1 million tonnes in 2016, with a growth of 4% in cargo tonnage on freighter aircraft and 5% increase in bellyhold freight on passenger aircraft.” (DfT, 2017, p. 67)”*
- 79. This is simply being economical with the truth of the DfT text, which states in the next paragraph, and again in the context of air freight in the UK:
- 80. *Figure 4.5 illustrates that the past five years see an extension of trends apparent in the previous decade with modest growth (by weight) of both types of freight. The decline in freighter ATM numbers but relatively constant levels of freight tonnage highlight that air freight has been increasingly carried on bigger freight aircraft.*
- 81. *Figure 4.5 Historic freight carried at all modelled airports*
- 82. *Freight in passenger and freight aircraft.*



83. *Freighter ATMs*



84. We must remember that it is not the tonnage of freight that matters in the context of a Development Consent Order, but the number of air traffic movements (ATMs). We can see that, in the UK, the number of freighter ATMs has decreased by around 30% in the 15 years to 2016. This is the principal market – dedicated freighters – that RSP is targeting for Manston.
85. *“6.3.3 This research shows that there is widespread support, and often passion, for Manston Airport, from people in all types of organisation. Manston Airport is in a unique position in the UK, having support from the local community and from a number of airlines and other organisations. It is essential for RiverOak to continue to harness the interest of the local community and to work with them to ensure the area gains the maximum benefit from a vibrant operational airport. In a time of cynicism towards participation, RiverOak is fortunate that the local community is willing and able to engage in the multiple debates that surround airport operations. Providing rewarding business and employment opportunities, and working with local providers to ensure high quality education and training for local people will be a fitting acknowledgment of their continued commitment to Manston Airport.”*
86. Dr Dixon claims that her research shows *“there is widespread support, and often passion, for Manston Airport, from people in all types of organisation.”* She presents no evidence for such an assertion or indication of the type of organisation she may be talking about and how far it extends beyond local campaigning groups.

Links to NNF08 (Critique of Azimuth Volume III)

87. Our critique of the Azimuth report continues in Volume III where we question the conclusions that Dr Dixon arrives at in terms of forecast aircraft traffic numbers.

88. Just as a flavour, we find it extraordinary that after the first year of operations Dr Dixon concludes that Manston will handle nearly 100,000 tonnes per annum of cargo on dedicated freighters. That is equivalent to 30% of the freight throughput today at the UK's principal cargo airport, East Midlands. And, that is more than twice the peak freight volume previously handled at Manston in its 15 years of operations. Manston's best year was 2003 when it processed 43,000 tonnes of freight.

Conclusions

89. Dr Dixon's dismissal of an analytical quantitative approach in favour of a qualitative judgement is unsound. Rather than using a logical, analytical and mathematical basis for calculating her demand forecasts for the airport, Dr Dixon has opted to use a small and unrepresentative sample of industry-related interviews of which the most influential have been minor local hauliers with a vested interest in Manston re-opening. She has completely failed to focus on the key players in the air freight market.
90. Dr Dixon's plainly fails to construct a solid demand forecast or offer more than a single view, developed by one individual, without any proper and reliable independent corroboration.
91. This matters greatly to the DCO application because it is the basis for Dr Dixon's extraordinary conclusion that Manston will achieve freight throughput of 100,000 tonnes per annum after just the first year of operations. That figure amounts to almost one third of the current annual freight handled at the UK's largest dedicated cargo airport at East Midlands. As we have shown, this is in a market – UK dedicated freight – which has declined in terms of ATMs (the basis for this DCO) significantly since the year 2000.
92. Dr Dixon's qualitative summary, relying predominantly on small and local players in the UK freight market, is the only evidence on which a potential investment of some £200-300 million depends. It is the sole basis for RSP's business case that it can develop a viable and sustainable freight airport. It is the basis for RSP's assertion that a reopened airport at Manston will deliver an additional 10,000 freight ATMs. It is the basis of RSP's claim that its plans qualify as an infrastructure project of national significance.
93. Given the complete lack of credibility around Dr Dixon's methodology and analysis, it is clear that RSP's business case is built on sand. In short, Dr Dixon's work cannot be taken as either sound or reliable. A DCO application built on business analysis as inadequate as this must be rejected.