

## **Ros McIntyre – Interested Party ref 20014158**

### **Compulsory acquisition and the requirement to consider alternatives**

#### RSP has only ever wanted to acquire the former Manston Airport site

There is no evidence that RSP has carried out any assessment as to where a new nationally significant dedicated freight airport (if, indeed, one were needed) would best be placed in the UK. In the absence of any national policy setting out a need for a new dedicated freight airport in the South East of England, let alone one at the very tip of the country, the ExA should interrogate the applicant under “Alternatives to Compulsory Acquisition” as to what assessment, if any, it has made of alternative locations for this new dedicated freight airport.

It should be a material consideration for the ExA that, during the years in which Mr Freudmann and then ROIC and finally RSP have been trying to acquire the airfield at Manston, the Government announced its intention to sell a number of military airfields. Some of these have long runways and are located near the logistical heart of the country. Some also have the advantage – unlike Manston – of being situated in areas where there is a relatively small resident population nearby. In addition, during the five years in which Mr Freudmann and his colleagues have pursued the Manston site, a number of other airports have become unprofitable, have faced closure, and have sought new investors. Yet there is no evidence that Mr Freudmann and his colleagues have approached the Government about the airfields that it is selling – airfields which are, on the face of it, far more suitable for a nationally significant cargo airport should the UK actually need an additional such airport. Nor is there any evidence that the developer has approached the owners of struggling airports that have been facing closure and that are seeking rescue by a new investor or owner. This is surprising, given that some of these airports are available on the open market and there is no need for a CPO to enable RSP to acquire them, nor for a DCO.

For those of us who have been close to this story for years, it is clear that Mr Freudmann and his colleagues are focussed on acquiring Manston, and only Manston. What they have not done is to start with the proposition that a cargo airport is required by the UK and then set out to determine where would be the best location for such an airport. No alternatives to the developer’s proposal have been considered. It is suggested that ROIC and RSP have abused the process, using a DCO process as a mechanism to attempt to acquire this particular site, rather than using a DCO process to satisfy a clear national need for an infrastructure project to be developed on that site.

When Mr Freudmann joined Wiggins (Manston Airport’s first commercial owner) in 1994, Wiggins was a property development company. It was not an airports and/or aviation company. Its new Vice President, Mr Freudmann, didn't come from an aviation background. Mr Freudmann described his background as:

*“He then founded his own consultancy advising public authorities and the private sector on the complexities of accessing structural funding from the European Union. This attracted the attention of the former Wiggins Group plc (now PlaneStation), which in 1994 invited Tony to become its Senior Vice President responsible for the strategic commercial development of the company's business, with particular emphasis on building long-term sustainable relationships with the public sector. In*

*this role Tony was instrumental in introducing airport development to the company's property portfolio with the acquisition of London Manston Airport in Kent, and for the subsequent development of the Company's interests in a number of regional airports in Europe and North and South America. In that capacity Tony exercised formal responsibilities as Managing Director for over 8 regional airports.”<sup>1</sup>*

Having been introduced to the idea of acquiring airports and then developing the excess land not required for aviation, Wiggins set out its airport acquisition strategy, which was to focus on:

*“former military bases with ample availability of surrounding land which can be developed using the real estate experience of Wiggins.”*

Manston fits this criterion. Indeed, on 31<sup>st</sup> March 2004, Planestation (the new name for Wiggins) said in its preliminary statement for the financial year then just ending:

*“Kent International has 100 acres of land, which is ideally suited for mixed commercial development. The Group also controls the adjacent 175-acre Manston Business Park with potential for further expansion. We are actively examining the best way forward for exploiting these valuable assets.”*

Indeed, during its period of ownership of Manston, Wiggins sold almost 30% of its land holding at the airport.

In 2014, when Mr Freudmann approached Mrs Gloag about the possibility of buying Manston Airport from her, he was clearly considering the unexploited housing development opportunity presented by the airport's Northern Grass. Having run Manston Airport for years, Mr Freudmann would have been aware that the Northern Grass was not required for the operation of the airport and that little use had been made of it. Whilst in discussion with Mrs Gloag, Mr Freudmann and his consultants, Indigo Planning Ltd, met TDC to seek TDC's view as to how it would respond to a planning proposal to turn the entire Northern Grass over to 1,000 new homes.<sup>2</sup> It is clear from this that Mr Freudmann sees housing development potential in the Manston site.

Mr Freudmann was introduced to ROIC in 2014. Mr Freudmann then introduced ROIC to Mrs Gloag. When negotiations with Mrs Gloag to acquire Manston came to naught, ROIC sought instead to persuade TDC to acquire the land via a CPO. This is set out in the submission by No Night Flights, **NNF03**. By the end of 2014 TDC had decided that ROIC was not a suitable indemnity partner. At no time during this process of ROIC trying to acquire the land via a CPO was it suggested that Manston Airport was a nationally significant infrastructure project. The objective was simply to acquire the site.

Through 2015 ROIC sought to persuade the new administration at TDC that ROIC would be a suitable indemnity partner for TDC to enable TDC to acquire the land via a CPO. ROIC was unsuccessful in persuading TDC that it had either the finance or the investors for it to be

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<sup>1</sup> Mr Freudmann's bio on the Freudmann Tipple International website. The website appears no longer to be available. It is possible that this disappeared when Mr Freudmann used the facility offered by Google to delete past internet records relating to one's own history

<sup>2</sup> Manston Airport – submission in respect of Thanet District council's draft new Local Plan – March 2014

a suitable indemnity partner for TDC. This is set out in the submission by No Night Flights, **NNF05**. At no time during this second process of ROIC trying to acquire the land via a CPO was it suggested that Manston Airport was a nationally significant infrastructure project. The objective was simply to acquire the site. At the close of 2015, its CPO plans having been thwarted, ROIC announced its intention to acquire the land via a DCO.

#### For consideration by the ExA

The ExA will be well aware that any decision to make a CPO (which this DCO application would require) requires proper consideration of the degree of interference that the CPO would mean for the landowner's human rights, and also consideration of the benefits of the landowner's own proposals for the site, in order that the ExA can consider and determine the public interest balance. It is uncontentious that, in seeking to justify any CPO, the ExA will have to be satisfied that the benefits of what RSP proposes would be so extensive that they would outweigh the benefits of the owners' plans as well as outweighing the detriment experienced by the owners by the loss of their property rights, and that there is therefore a compelling case in the public interest in favour of the CPO.

It is also uncontentious that any CPO should be a last resort. Alternative solutions that would not require interference with property rights need to have been properly considered and there should be an assessment of the preferred scheme against any of the possible alternatives.

In this case, the Applicant has not provided evidence that any other alternatives have been considered. RSP's sole objective has always been to acquire the land at Manston. However, if the purpose of the DCO is truly to answer the UK's need for a new nationally significant dedicated cargo airport, then it is obvious that feasible alternatives to using a CPO to acquire 720 acres of someone else's land exist – i.e. there are existing airfields and airports that are either on the market for sale or that are seeking additional investment and/or new ownership.

I respectfully suggest to the ExA that the Applicant should be put to proof as to the alternatives that it considered before regretfully deciding that the only way of providing a new nationally significant dedicated cargo airport to answer the UK's stated need was to use Government powers to acquire an airfield at the very south eastern tip of the country that is currently in someone else's possession.

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# Manston Airport

Submission in respect of Thanet District Council's  
draft new Local Plan

March 2014

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20430002  
Manston Airport  
Submission in respect of Thanet District Council's draft new Local Plan

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# Manston Airport

Submission in respect of Thanet District Council's  
draft new Local Plan

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# Executive summary

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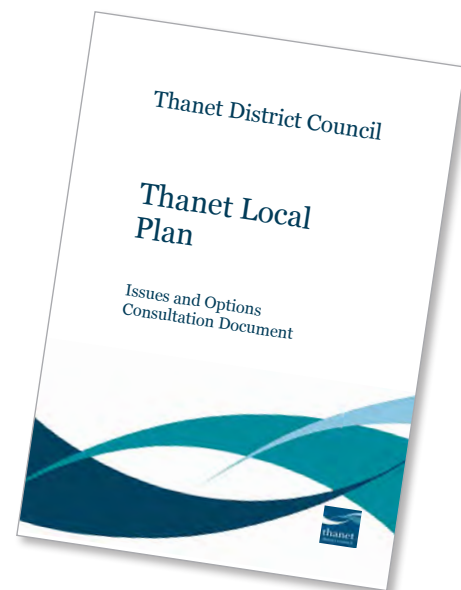
1. Manston Airport's new owners have been invited to submit proposals for development on redundant land at the airport to feed into TDC's ongoing work on its new Local Plan.
2. The Council recognise the need to attract new jobs and build enough houses to improve the quality of life of the district's residents. However, the urban area of the district is constrained by Green Wedges designed to keep the established towns separate, while more remote rural parts of the District are constrained by environmental designations and are generally less sustainable locations for new development.
3. TDC needs to plan for at least 11,791 new homes by 2031 to sustain predicted employment growth of 5,071 new jobs.
- 4. The redundant airport land to the north of the B2050 is no longer needed for airport activity but is brownfield land allocated for development. It extends to some 47 hectares (116 acres) and could play a valuable part in helping TDC to meet its housing needs by providing approximately 1000 dwellings.**
5. The redundant northern land relates well to the existing urban area to the east and would relieve pressure on existing resources and already built-up areas. It is well served by transport infrastructure and would provide an ideal location for establishing a new sustainable community.
6. Manston Airport would welcome the opportunity to work up options for this with planning officers over the coming weeks.

# Scope and purpose of this document

Manston Airport (MSE), under new ownership since December, is a key landowner in East Kent and, as such, has been in discussion with Thanet District Council (TDC) about the Airport estate and the district as a whole.

In January and February 2014 Alastair Welch of the Airport met TDC's Director of Community Services (Madeline Homer) and Planning Manager (Simon Thomas) to discuss economic development matters and the Council's evolving Local Plan. At the second meeting (attended also by Simon Neate of Indigo Planning) MSE was invited to submit proposals for development at Manston to feed into TDC's ongoing work on the development of its new Local Plan.

**The key message of this submission is that there is a valuable opportunity to meet a significant proportion of the district's housing land requirement on previously developed land immediately north of Manston Airport (beyond the B2050 road) that is within the airport's ownership but is surplus to their requirements.**



Historic photo of Manston Airport



# The Challenge and TDC's Vision

Thanet is in the prosperous South East but on its periphery. Investment has suffered and tourism has declined, so there is a need to attract new jobs and build enough houses to improve the quality of life for the district's residents. TDC is addressing these challenges in its Corporate Plan and its evolving draft Local Plan:

## The Corporate Plan

TDC's Corporate Plan aims to promote investment, skills, employment, efficiency and innovation to provide a sustainable mixed economy. It encourages building and development in the right places to support job growth. This strategy relies on there being an increase in the proportion of decent homes in Thanet.

## The Local Plan

Building on the Corporate Plan, the Local Plan must recognise the connection between the need to grow the local economy and expand the supply of new housing. The Local Plan identifies a need to provide a bare minimum of 3,700 houses between 2011 and 2031 but aspires to higher economic growth, resulting in a demand for **at least 11,791 new homes**.



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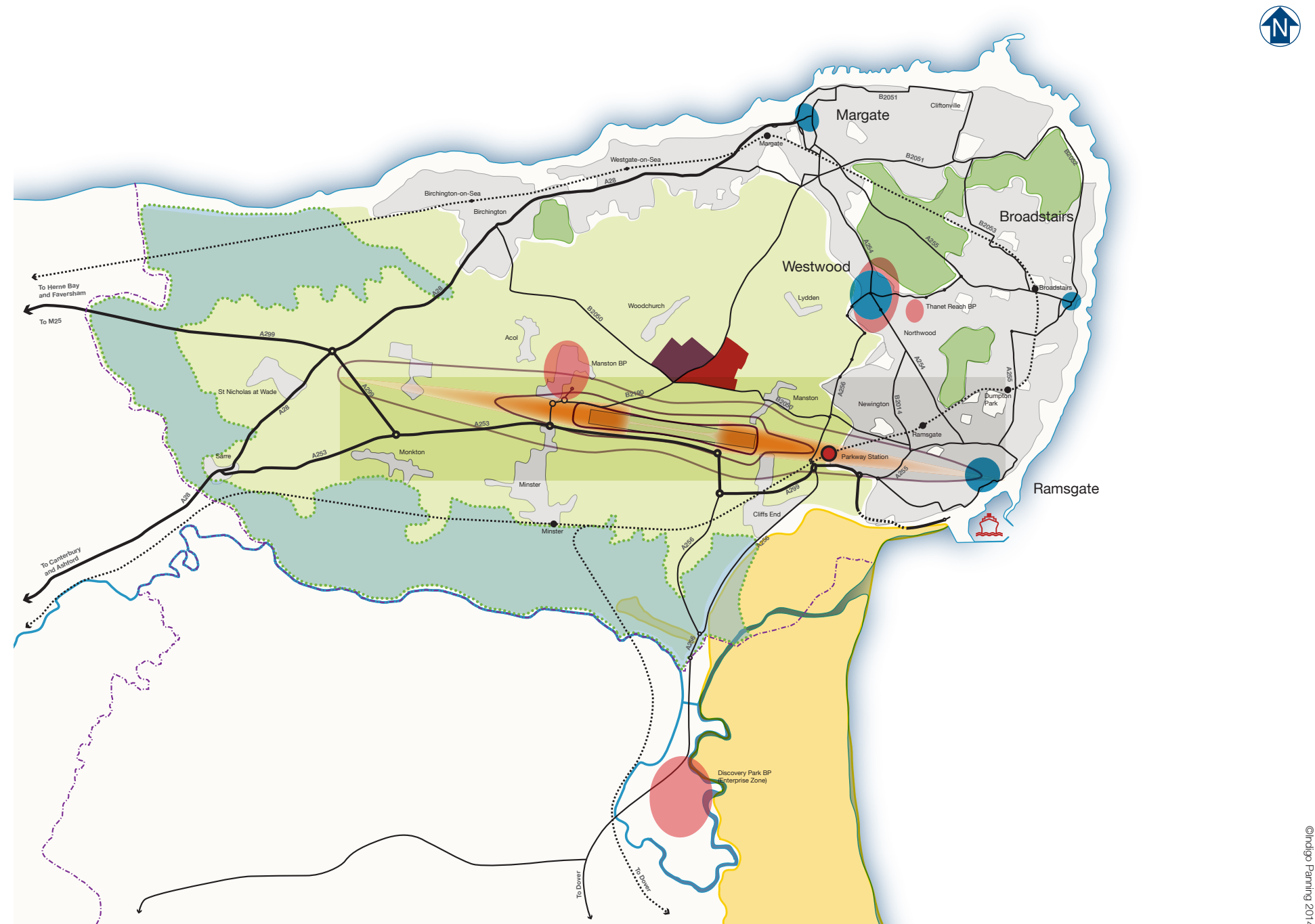
# Snapshot of Thanet

Thanet's built environment comprises several elements which contribute to the character and form of the district:

- **Urban Area:** The coastal urban belt has expanded inward from the coast but protected **Green Wedges** provide visual and physical separation between towns and remain an important part of the character of Thanet's built form;
- **Town Centres:** Westwood Cross, midway between the three towns, is the district's principal retail location while Ramsgate, Margate, and Broadstairs play more specialist roles in supporting the tourist market and offering a larger number of independent niche shops;
- **Transport and Access:** Rail services connect the coastal towns and continue west to the rest of Kent, and HS1 provides high speed access to London (potentially in future from the proposed Thanet Parkway Station), While the A299 dual carriageway and A28 links have also improved connectivity; and
- **Business Parks:** the Eurokent, Manston, and Thanet Reach business parks in the district and Dover's Discovery Business Park (with Enterprise Zone status, and is now home to over 60 companies and 1,400 jobs) provide significant job opportunities.

Many of the more rural parts of the district are constrained by environmental designations. They are also more remote from the urban centres and therefore generally less sustainable locations for new development.

Some sites nearer the urban area (including Manston Green and some others currently being promoted for housing development) are constrained by other considerations, including airport operational factors.



— Road	Port	Town centres	57dB noise contour*	Allocated for development / redundant Northern and adjoining land
..... Railway	Urban area	Business Park	63dB noise contour*	Adjoining allocated land / MOD land
● Train station	Green wedge	Potentially constrained area	69dB noise contour*	Wantsum FRA
● Proposed Parkway Station	RAMSAR / SPA / SSSI	Landscape character area	Local Authority boundary	

\* Taken from the masterplan

# How many new homes?

Significant housing growth needs to be planned for to sustain sufficient levels of labour supply.

TDC has rightly chosen to proceed with a higher economic higher growth scenario in order to increase the local population and ensure that the resident workforce is able to sustain economic growth.

On this basis TDC needs to plan for at least 11,791 new homes in the district in the period 2011 to 2031 in order to sustain a predicted increase in employment growth of 5,071 new jobs.

## Thanet District Council's objectively assessed need

The housing targets set out in the scenarios do not take into account current housing need. Although the zero net migration scenario includes new homes to address future changes in household size, the Plan makes no reference to how TDC intends to address the backlog of market and affordable housing need. An update to the SHMA (2009) will be required to identify this and this is likely to result in the need to plan for additional homes – i.e. over and above 11,791. The housing requirements are set out in more detail at Appendix 1.

## Where will homes be delivered?

TDC is currently updating its SHLAA but has assumed that approximately 5,000 new homes could be provided in the urban area. This means at least 6,791 new homes will be on greenfield land. **Any housing that can be delivered on brownfield land, such as the redundant northern land at the airport, will reduce the amount of greenfield land required for housing.**

11,791

Number of homes needed to meet economic aspirations

5,071

Number of jobs to be created

5,000

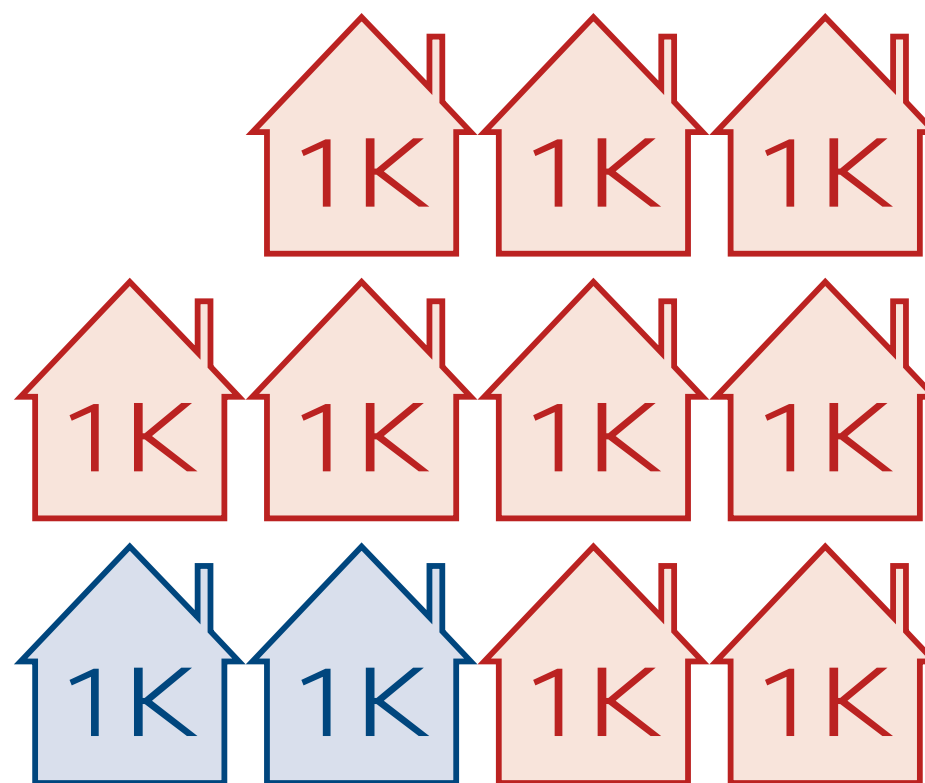
Number of homes to be provided in urban area

6,791

Number of homes on greenfield land required

340ha

Land required to deliver 6,791 homes at a density of 20dph



2,064. Existing housing land supply identified  
11,791. Number of homes needed to meet economic aspirations

# New Spatial Plan












Thanet needs a development strategy for the district that improves the quality of life for its residents and meets their needs. The three dimensions of sustainable development should be at the heart of Thanet's new spatial plan, which should strive to:

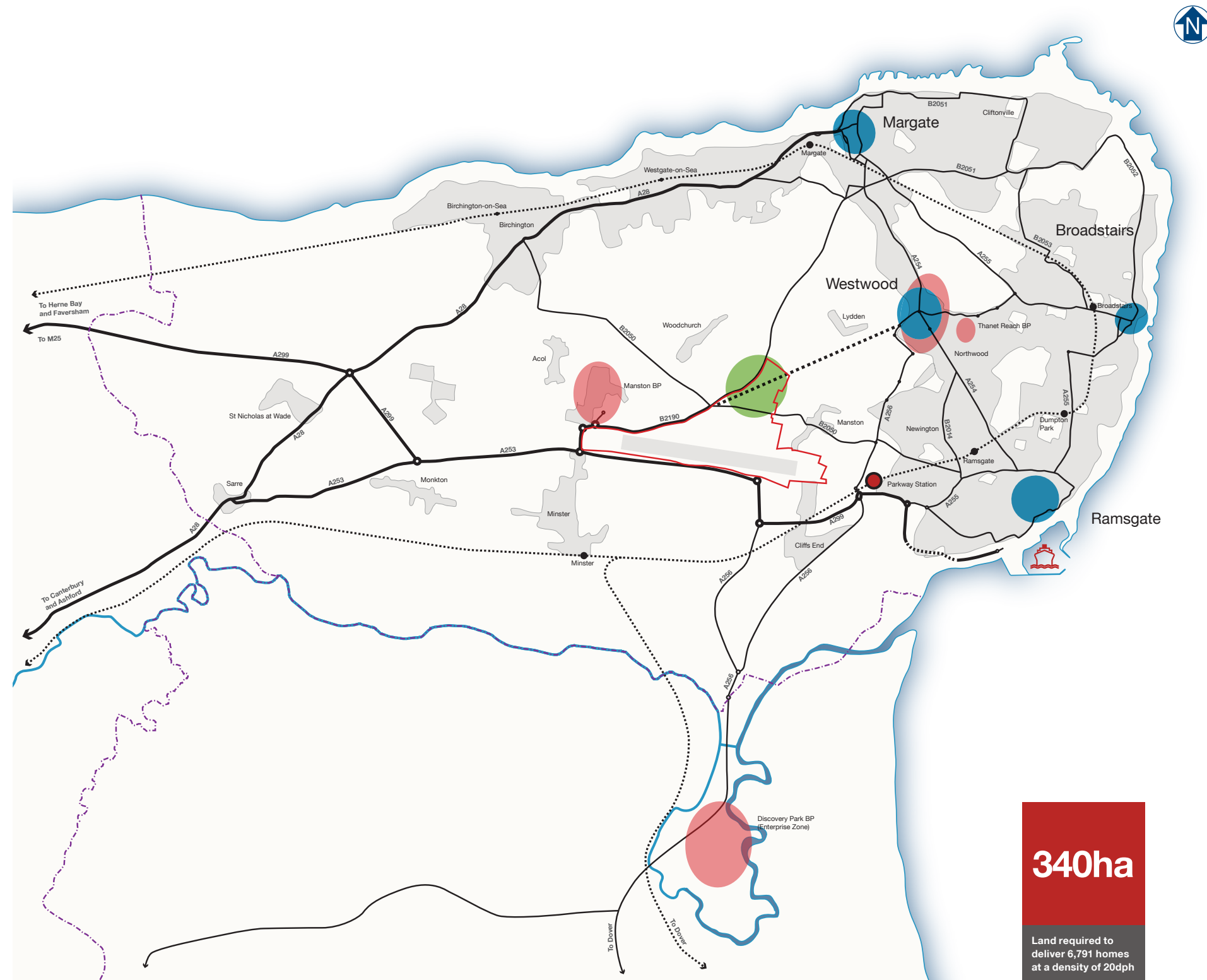
- Build a strong economy;
- Provide for the social needs of the district, particularly for housing; and
- Protect the environment.

Access to services, employment and housing will be key to achieving sustainable development. Westwood provides a vital centre of retail, leisure and employment midway between the main coastal towns. Business parks, such as Manston Business Park, provide opportunities for further employment development.

New infrastructure will be required to support the delivery of housing and Thanet's new spatial plan needs to exploit improvements already made, such as the A253, or programmed.

There is surplus land at the airport that is previously developed land - immediately north of Manston Airport (beyond the B2050 road) that is within the airport's ownership but is surplus to their requirements, it is well located in relation to the places people need to get to and can accommodate housing.

- |  |   |
|--|---|
|  Kent International Airport |  Allocated for development / redundant Northern and adjoining land |
|  Road                       |  Local Authority boundary  |
|  Railway                    |  New link road   |
|  Train station              |  Proposed Parkway Station  |
|  Port                       |   |
|  Urban area                 |   |
|  Town centres               |   |





# Opportunity land

MSE is an operational airport dating back to 1915 with a heritage of military and more recent civilian passenger uses. During World War II, it was extensively used as its location meant it was critical as one of the first airfields available for damaged aircraft returning home. Today, the airport is used for aircraft parking, maintenance, cargo and limited passenger operations.

The historic use of all the airport land is still recognised today through the adopted Local Plan's allocation, which supports development for expansion and diversification.

The airport's land to the north of the B2050 is no longer needed for airport activity. This area previously accommodated the old cross wind runway and various taxiways, aircraft parking areas, old underground facilities etc. but these are no longer used.

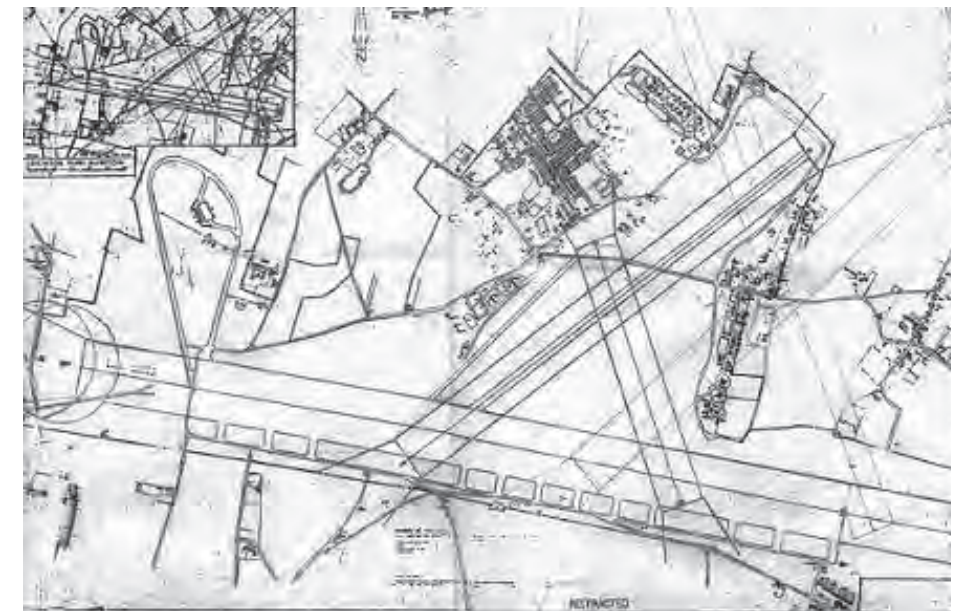
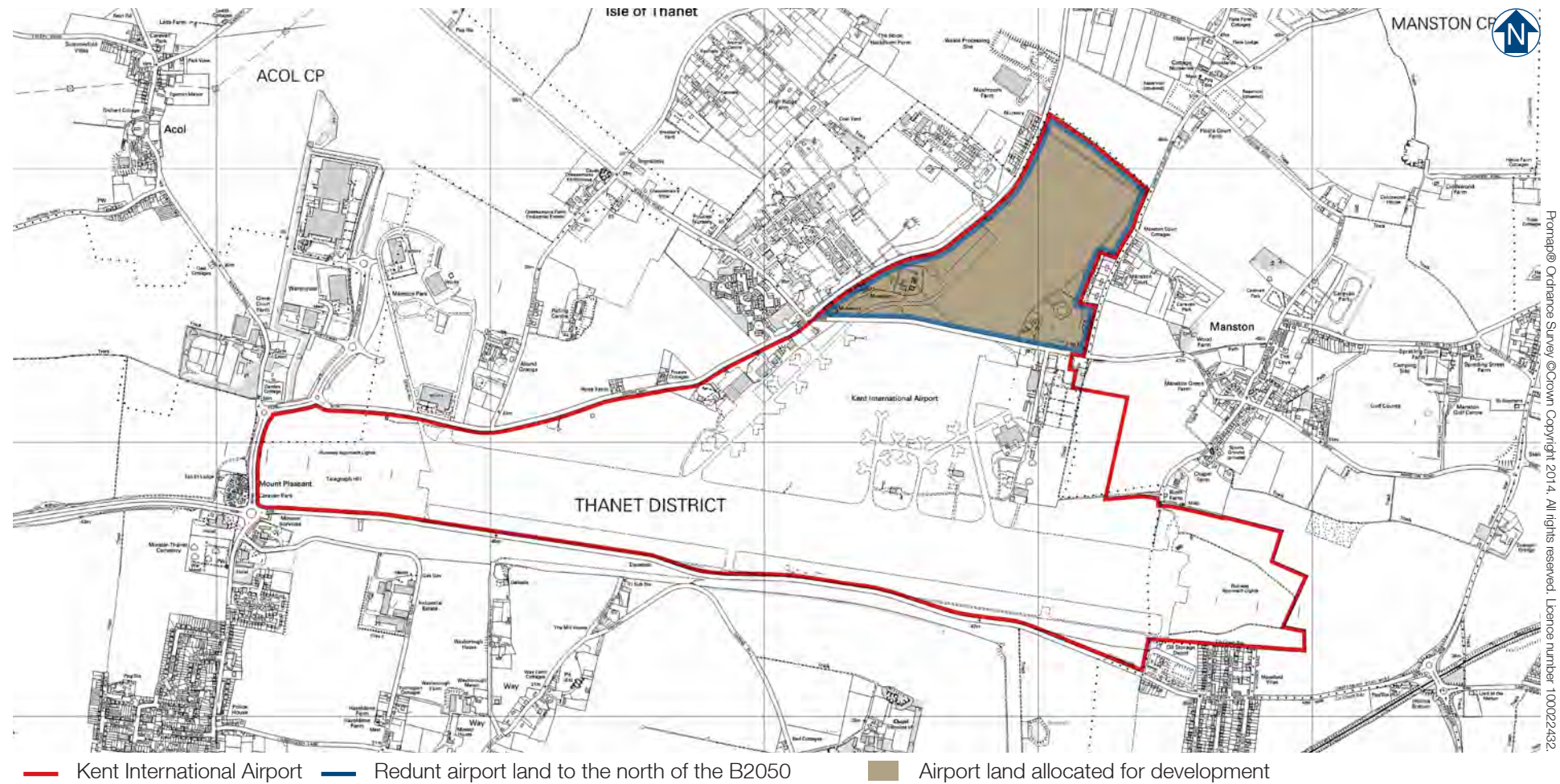
This land is predominantly brownfield in nature, extends to some 47 hectares (116 acres) and could play a valuable part in helping TDC to meet its housing needs in the emerging local plan.

# 47ha

Northern Grassland site area



Homes on the Northern Grassland area at a density of approximately 20dph



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# Scope for sustainable development

There is a very large shortfall of housing provision in the district and only limited opportunities to find more sites in the existing urban areas. Green wedges limit the scope for new development and are designed to prevent the three main towns merging together.

It is therefore necessary to consider an alternative sustainable location to accommodate the level of new housing required and its associated infrastructure.

The surplus brownfield land at MSE provides an obvious focus for new development. Combined with adjoining land, some of which is also brownfield, it relates well to the existing urban area to the east and would relieve pressure on existing resources. It would be a natural extension to developing the airport land and provide an ideal location for establishing a new sustainable community within Thanet that would:

- Impose less strain on existing development areas; and
- Be more cost effective in terms of the new infrastructure needed to support the new housing than if it was distributed across several smaller developments.

**340ha**

Land required to deliver 6,791 homes at a density of 20dph



- Kent International Airport
- Road
- ..... Railway
- Train station
- Proposed Parkway Station
- Urban area
- Town centres
- Business Park
- New link road
- Allocated for development / redundant Northern and adjoining land

Scope for sustainable development

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# Conclusions

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TDC needs to plan for a significant amount of new house-building. Even with modest growth aspirations there is a need for a large amount of land to accommodate the new dwellings needed to meet the need for more and better quality homes over the next 20 years.

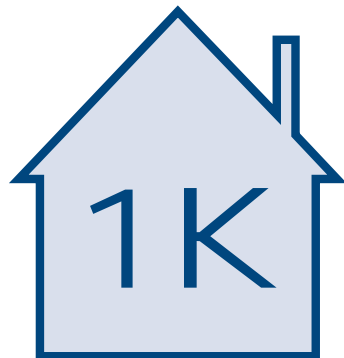
**Surplus previously developed land at the Airport and adjoining areas would be suitable for the sustainable development of large scale housing and would provide a sound basis for the evolution of the district.**

MSE would welcome the opportunity to work up options with planning officers over the coming weeks but wish to share this in outline with members at this early stage to ensure their comments can be taken into account as the proposals are developed.

47ha

Northern Grassland site area

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Homes on the Northern Grassland area at a density of approximately 20dph

# Appendix 1



## Housing and economic growth

Thanet District Council's (TDC) vision for Thanet as set out in the Local Plan Issues and Options is, by 2031, to realise its growth potential as a location for business investment; make the most of its close proximity to Europe and easy access to London, and to play an important role in East Kent; to successfully retain and attract skilled people to live and work in the area; and to provide high quality new homes, as well as the regeneration of Thanet's high quality historic housing and provide a choice of homes for Thanet's residents and for those who have invested and relocated to the area.

In order to achieve this vision, TDC has outlined strategic priorities including to:

- Create additional employment and training opportunities, to strengthen and diversify the local economy and improve local earning power and employability;
- Provide homes that are accessible to, and suited to the needs and aspirations of, a settled and balanced community;
- Safeguard local distinctiveness and promote awareness, responsible enjoyment, protection and enhancement of Thanet's environment, including the coast, countryside, rich seaside heritage, historic environment, diverse townscapes and landscape, biodiversity and water environment; and
- Provide an efficient and effective transport system, delivering the transport infrastructure required to support existing communities and new development.

In order to achieve the strategic priorities, and ultimately the vision for 2031, TDC will need to plan for and strike an appropriate balance between new housing and economic growth.

## The Housing Requirement

The South East Plan (May 2009) set TDC a housing requirement of at least 7,500 homes over the 20 year period from 2006 to 2026. Government has since abolished that Plan and local authorities are responsible for deciding how many homes are appropriate for their areas. TDC now needs to determine how many additional homes to provide for over the Local Plan period to the year 2031. According to national planning policy, this must be the 'objectively assessed need,' and it will be scrutinised and probably challenged by the house-building industry.

The Local Plan Issues and Options (May 2013) recognises that:

- National forecasts suggest Thanet's population will grow by 11,500 between 2011 and 2021 (Source ONS interim 2011 sub national population projections);
- Thanet has an ageing population and reducing labour supply;
- New homes will need to be provided in order to meet the needs of Thanet's existing residents, as well as those moving in to the District;
- Due to the ageing population and changes to the existing population structure, working people will need to be attracted to Thanet;
- There is a high level of need for affordable homes;
- At present more people commute out of Thanet for work than into it, and this is expected to continue in the future; and
- Population forecasts indicate there will be an increase in single person households in the future.

The Economic and Demographic Forecasts for Thanet (February 2013) identifies that the effect of an ageing population will be to constrain the future level of the residential labour supply, which will make it difficult to realise the full job potential without some level of net inward migration.

The document sets out a number of dwelling forecast scenarios which have been included in the Local Plan Issues and Options. These are:

1. Zero Net Migration: assuming an equal level of in and outward migration. This identifies a need for 3,714 dwellings (186 pa) between 2011 to 2031, is based on the need arising from the decrease in household size in the district to 2.2 persons per dwelling up to 2031;
2. Economic Lower Growth: based on predicted employment growth of 1,229 new jobs resulting a need for 7,600 dwellings (380 pa), including the anticipated need for 3,714 dwellings arising from changes in household size;
3. Economic Baseline: based on predicted employment growth of 3,082 new jobs resulting a need for 9,639 dwellings (482 pa) inclusive of the 3,714 dwellings from changes in household size;
4. Economic Higher growth: based on predicted employment growth of 5,071 new jobs resulting in a need for 11,791 dwellings (590 pa) inclusive of 3,714 dwellings from changes in household size; and
5. Trend Migration: assumes past migration levels continue at the same rate as over the past five years resulting in a need for 11,648 dwellings (582 pa). This is comparable with the housing growth identified under the economic higher growth scenario.

In order to meet TDC's aspirations as set out in the vision, TDC will need to proceed with the economic higher growth scenario in order to increase the local population and ensure that the resident workforce is able to sustain economic growth in the area.

Based on the scenarios outlined above this will entail planning for at least 11,791 new homes in the district between 2011 to 2031.

## Objectively Assessed Need

The Government's planning policies for housing are set out in the National Planning Policy Framework (NPPF) (March 2012). Paragraph 47 states:

"To boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

In order to determine its objectively assessed need, TDC will need to update its evidence base. TDC is currently relying on the Strategic Housing Market Assessment (SHMA) for the East Kent Sub-region (June 2009). This will need to be updated in order to demonstrate that the housing requirement identified in the Plan is robust.

The housing targets set out in the scenarios do not appear to have taken into account current housing need. Although the Zero Net Migration scenario includes new homes to address future changes in household size arising from natural population growth, the Plan makes no reference to how TDC intends to address the backlog of market and affordable housing need. Once this has been assessed as part of the update to the SHMA, it is likely that this will result in the need to plan for additional homes, irrespective of which scenario is pursued.

It is vital that this is undertaken to ensure that the Plan is positively prepared and is found by the Inspector to be 'sound.'

In light of this, it is likely that the 11,791 dwellings proposed in the economic higher growth scenario will need to be increased.

# Appendix 1

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## Location of new housing

The Local Plan Issues and Options document identifies that, in recent years, around 95% of the new homes in Thanet have been provided on land that was previously developed. Much of this was in the urban area and included the re-use of buildings through conversion to flats.

In many cases, proposals to provide further flats in Thanet have raised concerns about town cramming, loss of garden space, erosion of the stock of family houses, concentrations of poor quality small flats resulting in densely populated, polarised and transient communities and the attraction of benefit dependent households into the district. There is also a significant risk that the intensification of the urban areas (ie by significantly increasing the numbers of dwelling units and residents in the existing built-up areas) is eroding their character, individuality and attractiveness.

The latest SHMA (June 2009) notes that, compared with Dover, Canterbury, Shepway and Swale Districts, Thanet (at 22% in 2001) had the highest proportion of flats, and that policy should re-balance the stock by incentivising the provision of family homes and controlling the number of conversions of larger homes to flats. At 2011 Thanet still had a higher proportion of flats, and it had increased to 28% of all housing stock. Conversely, Thanet also has the lowest proportion of detached houses.

In order to address these issues, it will be necessary to bring forward greenfield land for development.

TDC is currently working on its updated SHLAA. Work to date suggests that the urban area containing the coastal towns and some undeveloped land (as defined in the Local Plan 2006) may have capacity to accommodate in the region of 5,000 additional homes by 2031. However, this indicative figure will very much depend on the type and density of homes provided and whether or not the submitted sites are available, suitable and achievable.

Even if it is realistic to assume that the capacity of SHLAA sites is 5,000 dwellings, against the housing requirement set out in the economic higher growth scenario this represents a shortfall of 6,791 dwellings.

## Existing Supply

As of March 2012, TDC reported an estimated housing supply of 2,064 dwellings for the remaining 14 years of the current plan period (ie up to 2026) comprising 169 dwellings on existing allocated sites and 1,895 dwellings with planning permission.

Given that TDC has only reported a remaining supply of 2,064 dwellings, needs to provide at least 11,791 dwellings to support economic growth, and assumes that up to 5,000 could be delivered on SHLAA sites within the urban area, there would still be a shortfall of at least 4,727 dwellings.

It is also likely that the 5,000 dwellings identified in the SHLAA include some allocated sites and those already with permission that have already been included in the existing supply. Therefore the shortfall could in fact be greater.

Whichever housing requirement is adopted, meeting future housing requirements to 2031 will almost certainly mean that significant greenfield land will need to be allocated for development.

