

Personal Submission by Dr. R. John Pritchard to Deadline 4.

1. Entirely in my personal capacity I offer these remarks in response to Written Submissions, Local Impact Reports (including that of Thanet District Council which is far from well-disposed to RiverOak's DCO Application), and Responses to the first Written Questions, all as received to Deadline 3.

2. I wish to begin by deploring the cool response, at best, that TDC has submitted in REP3-010, the Thanet Local Impact Report, TR020002-003135.

3. I do not feel that para 2.3.6 of that LIR even begins to address the history of Thanet District Council's relationship with RiverOak which I believe to be crucial in determining what weight to give to that Local Impact Report. At the present time I am not persuaded it will be necessary to add much to what I have previously said about in my submissions to Deadlines 1 and 3 [vide REP1-057 (TR020002-002921) and REP3-150 (TR020002-003311)], but I have touched upon that and alluded to the dolorous history of TDC's handling of other major infrastructure projects at para. 9, below.

4. I take note that "TDC has considered the purpose of the LIR as set out in Section 60(3) of the Planning Act 2008 (as amended), DCLG's Guidance for the examination of applications for development consent and PINS Advice Note One, Local Impact Reports, in preparing this LIR." I agree that this is the correct framework within which TDC needed to carry out that Report.

5. I do not accept that TDC did so sufficiently or at some points at all, I do not regard that document as fair, just or reasonable, I regard it as unfit for purpose, and I believe it cannot be relied upon by the ExA or by the Secretary of State.

5.1. I expect that s. 104 of the Planning Act 2008 will be the basis on which this Application will be decided, and in that case the Local Impact Report will not carry much weight in any event.

5.2. However, I fully understand that to the extent that the alternative where ss. 105 (1) and (2)(a) of the Planning Act 2008 may be deemed to apply, the merits or otherwise of Thanet District Council's Local Impact Report may assume particular importance, and it is to that question that I wish to devote most of my Response to the Written Submissions to Deadline 3 now.

6. For the avoidance of doubt, I believe it is clear that TDC had more than enough opportunity to become fully familiar with RiverOak's Application and its importance. It is unsurprising that they required no extension of time to produce the LIR (although they seem to have begun working on that very late in the day), and I am aware that RiverOak and TDC have been engaged for some time in efforts to reach Statements of Common Ground. It may be that Thanet District Council hopes to submit another Representation in respect of the merits of the present Application, but that is not clear within this document, REP3-010.. But as per the DCLG Guidance and PINS Advice Note 1: Local Impact Reports, "it is important to include ... local social or economic issues or local knowledge of travel patterns to community facilities. This should ensure that local issues which might not otherwise come to the attention of the Examination are properly taken into account." That is well-bedded down and confirmed in "Local Impact Reports," Article 73, "Local Impact Reports," (Hereward Phillipot QC and Michael Humphries QC), in Michael Humphries *et al.*, *National Infrastructure Planning Handbook, 2018*, at 392 (at present the only legal practitioner manual on DCO law and practice, now in its third edition). This chapter in Humphries, indeed, is unchanged from the 2016 edition.

7. Hereward and Humphries (2018) observe, at 393, that "PINS Advice Note 1 suggests that the LIR should consist of a statement of positive, neutral and negative local impacts, but it does not need to

contain a balancing exercise between positives and negatives, as that is a matter for the Examining Authority", and Advice Note 1 itself clearly says that "Parish councils, organisations and members of the public may have made representations to the local authority or directly to the applicant about the scheme (prompted, for example, by the applicant's consultation). The LIR could include reference to these representations, *but only where they are relevant to a particular local impact which the local authority itself wants to highlight*" [emphasis added], and so there is no duty to appear or be impartial, nor any duty for the Local Authority to undertake its own independent consultation, but nevertheless it necessarily follows that the contents of the LIR should be sufficient for the Examining Authority to undertake the balancing act safely or in the alternative that the Examining Authority must take into account evidence as to whether the LIR is in that respect and to that degree impartial or even, colloquially, "fit for purpose".

8. Within the current edition of PINS Advice Note 1 (version 2, April 2012) [<https://infrastructure>], local authorities are advised that "In practice, local authorities will know about the application some time before it is submitted, through the pre-application consultation carried out by the applicant. At this stage they should ensure that they gather sufficient information about the scheme to enable them to commence work on their evaluation of the proposal. This will have the added benefit of enabling them to focus their responses to the applicant's consultation when the application is being prepared. Local authorities should ensure any necessary internal authorisation processes are in place to meet the timetable. It is entirely a matter for local authorities to determine whether or not an LIR requires approval by Members and in what form."

9. However, Thanet District Council was for a very long time **highly and unusually resistant** to engaging with the Applicant at all; blocked or opposed many efforts by the Applicant to engage with members of the Senior Management Team, the Planning Department or Elected Members, and the present LIR provides evidence that Thanet District Council on this (as in other infrastructure projects) did not exercise due diligence in meaningful ways.

9.1. TDC has failed to appreciate how important and positive the impacts of RiverOak's DCO, predictably will be within the Local Authority and in relation to neighbouring local authorities with whom TDC has shared services arrangements.

9.2. Indeed, as I have previously submitted, the hostility of the senior management team of Thanet District Council towards the RiverOak proposed development throughout its evolution has been notable within Thanet throughout the past five years notwithstanding the fact that the overwhelming consensus of public and business opinion within Thanet has been favourable to the reopening of the airport for commercial flights and to the Applicant's endeavour to achieve that, as I previously demonstrated at Deadline 3 in my own contribution to the collective document REP3-044, TR02002-003349, SMAa Written Submissions on Local Support for Manston Airport, at Deadline 3: *vide* pp. 487-546, and in my personal submissions at REP1-057 and REP3-150, cited in para 3, above.

9.3. There is, of course, an abundance of evidence referred to by others in their submissions about TDC's consistent pattern of mismanagement of major infrastructure and other expensive projects competently or with due diligence: the Cardy Project, Sally Ferry issue, Dreamland, the Motor Museum, the Brett Contract at Port Ramsgate, the Ferry Walkway design at Port Ramsgate, poor maintenance of the harbour arms of Ramsgate and Margate, and years of engagement with Manston Airport issues have all been mismanaged by TDC over the years.

10. Among the issues which TDC's Local Impact Report slights or ignores, are the relations between well-established local industrial firms, and the scope for a symbiotic relationship with and

between newer enterprises that have cropped up in recent years since the airport closed, and with the airport when it re-opens.

10.1. The TDC LIR ignores the scale of those industrial parks, the number of the establishments that have come to be located there, the scope for their further development in **harmony** with the airport.

10.2. It does emphasise the fact that Ramsgate's visitor economy (including tourism) will be affected by the Applicant's proposed development at the airport, but it does so in a highly prejudicial way, ignoring, for instance, that the main centre of gravity for tourists in Thanet does **not** lie in Ramsgate but in the adjacent towns of Margate and Broadstairs, and that the airport will undoubtedly bring very considerable benefits without any or any significant detriments not only there but to adjacent visitor magnets including Canterbury, Herne Bay, Whitstable, Sandwich and Deal.

10.3. Indeed the scope for positive developments that will flow from the airport's redevelopment both as a cargo hub and from associated commercial passenger services and private planes in all of those localities is exceptionally significant, as examples I shall offer will show. These are matters which I believe the Examining Authority should take fully into account.

11. In illustration of this, I would instance the LIR reference to the proximity of a golf course near the airport but in truth the LIR is silent on the extent to which there are indeed a cluster of golf courses in this area. Chief amongst those is the Royal St. George's Golf Club in Sandwich which is a world renown magnet for golfers of the highest distinction, part of an international circuit that draws very numerous international competitors, large crowds of spectators and contributes a great deal to the local economies of the East Kent coastal towns, and it should be obvious that with Manston Airport back in service events like these can support more support jobs and bring more income into Sandwich and its attractive neighbouring districts including all of Thanet and indeed Canterbury. There are, however, a good many other very fine golf courses located within Thanet, too, and they contribute much to our local economy, and the airport's redevelopment and higher levels of employment cannot fail to be beneficial to all of the golf courses whose futures are dependent upon a strong local economy. It is no accident that these golf courses were established when the local economy was far more thriving than at present.

12. At one time, there was no shortage of hotel accommodation in Thanet and Margate was frequently the location at which national party conferences were held, but now many of the hotels and venues have closed or are struggling. There are at present only a fraction of the number of rooms for visitors that there once were, just a few hundred not thousands. Paradoxically, this means that the airport passenger services (especially when considering the potential divine retreat centre visitors that the Vincentians planned to bring through Manston) in the short term are likely to benefit surrounding towns as much or more than those in Thanet. Yet many of the former B&B and larger hotels remain under-utilised, and others might well be re-converted or renovated to productive use as hotels again if the opportunities to do so were there: collectively that would produce a very large increase in jobs. The reopening of the airport offers opportunities to catalyse such changes, not least to the benefit of the Local Authority. Failure to do so would simply mean that much of the benefits from visitors would pass to other nearby local authority districts or be lost altogether.

13. On 25 February, at my request, Cllr. Sam Bambridge, a Thanet District Council, sought information from Louise Askew, Strategic Partnerships Manager at Thanet District Council. I believe that the questions and answers bear upon the adequacy of Thanet's Local Impact Report on the Manston DCO Project. The questions I asked, through her, were:

1. What are the number of day trippers we are getting to Thanet?
2. How many stay one night?
3. How many stay more than one night but less than a week?
4. How many language school students are there?
5. How many stay one to two weeks? Longer than one month? Longer than two months, or for a full academic year or longer?
6. What are the economic benefits of overseas visitors to Thanet?
7. How much did language schools contribute in commercial rates over the past ten years, year on year?
8. Did growth in visitors add to the valuation of commercial business properties over ten years?
9. What is the rateable value of the airport? Over the past ten years, year on year?
10. Does TDC know what the rateable value of the airport will be if the infrastructure developments RiverOak have applied for are consented?

14. The response to the foregoing was obtained from Louise Askew on 27 February as follows:

"We invest in a tourism model through Visit Kent called the Cambridge Model, currently the research is carried out every two years. It looks at day trips, staying visitors, where visitor spend is made, the jobs created and economic impact. It splits visits by day trips and night visits, it doesn't have detail of the number of nights particularly.

"You will find the 2013, 2015 and 2017 reports on the Visit Thanet Business website - <https://www.>

"Also available on the Visit Thanet Business website is a report the Council commissioned in 2013 on the Economic Impact of the Language Schools sector, the Council does not regularly research the value of this sector.

"You can also find a link to the Visit Kent Business Barometer that gives a snap shot of the tourism sector across Kent.

"I am unable to comment on whether the growth in tourism has impacted the valuation of commercial premises and I do not know what the value of the business rates was/is/could be for the airport. The Valuation Office Agency website might have the information you are looking for, it is not something that I hold."

15. It is worth bearing in mind that it is a strategic policy of Thanet District Council to increase the number of visitors who stay at least one night. From what Louise Askew wrote, it might appear that the Council have not clearly recognised in the LIR (as Azimuth and RiverOak have) that language schools and, for that matter, enterprises such as the Ramsgate Divine Retreat Centre run by the Vincentians, ALL add to the number of visitors and for periods much longer than a single night. This would dramatically undercast the impact of staying visitors that come to Thanet and stay for a period of time. Day trippers bring in far less benefit to the town than staying visitors, and the longer our visitors stay the more it helps our economy. However, it is clear TDC's SMT DOES know all of that but has ignored it in the Local Impact Report, REP3-010.

16. Properly measuring the impact of staying visitors (including tourists), and reporting it in the LIR, would have been welcome, but failure to do so in my submission diminishes the weight that

should be attached to Thanet's Local Impact Report. The various special events like the Margate Gay Pride celebrations, Margate Soul Festival, Margate Winter Gala, Margate Meltdown (run in conjunction with the AceCafe), Broadstairs Folk Week, Broadstairs Dickens Festival, Broadstairs Food Festival, Broadstairs Food Festival all matter, too. They create and sustain employment and local Thanet and East Kent businesses. With help from the airport, some of these events may have a trans-European appeal. It is certainly clear that none of that has been recognised in TDC's Local Impact Report, and indeed there has been an obvious tendency by TDC, Ramsgate Town Council, the Ramsgate Society and No Night Flights to conflate Ramsgate's tourists (principally day trippers, apart from Tall Ships events and similar visitors) with the whole of the tourist economy of Thanet. In doing so, these interested parties appear to me to imply, quite incorrectly, that the Examining Authority should conclude that any negative impacts from aircraft movements on the flight path over Ramsgate will badly affect the whole of Thanet and its diverse and emergent "café culture".

17. The truth of the matter is that while there were 4.2 million visitors to Thanet in 2017, contributing £319 million to our local economy in Thanet, and 64,970,000 visitors came to the county of Kent throughout 2017 with the county's tourism industry accounting for 76,828 jobs, the part that Ramsgate and the small number of establishments along Ramsgate seafront contributes to that visitor economy is a relatively small in comparison to the whole of that. The growth in the café culture in Ramsgate is part of a county-wide trend.

18. Contrary to what the LIR suggests and critics of the airport say, there is no evidence whatever that the burgeoning of the Isle's café culture is due to the closure of the airport: indeed, the opposite is clearly true, for the present expansion was to a great extent the product of a five year plan that was developed over a period of time and published in 2013 before the airport closed in 2014.

19. If the airport had been in use, it is highly likely, indeed sure, that Thanet's share of the visitor economy would have been even more than the recorded 345,000 domestic trips and 145,000 overseas trips; 1,040,000 domestic nights and 1,120,000 overseas nights; £54 million domestic spend and £70 million overseas spend in 2017, as recorded in Visit Kent Economic Benefit from Tourism: Thanet 2017 Results, published in November 2018 [<https://www.visitthanetbusiness.co.uk/media/3014/1-economic-impact-of-tourism-thanet-2017-1.pdf>], added to Deadline 4 at TR02002-003678. Put simply, airports, *ipso facto*, stimulate travel.

20. The café culture of Ramsgate IS iconic and IS worth preserving. So is that in each of the other towns. These towns won't collapse when the airport re-opens: quite the contrary, in fact. Although the café culture of Ramsgate is a comparatively small player in the real local economy, it does have high visibility, close to people's hearts, and is always seen as an important part of Thanet's culture. It will continue to be so when the airport returns. I have never seen an airport near a tourist destination that did not enhance the attractions and visitor numbers of its resort areas. I have already referred to the Ramsgate Divine Retreat Centre and the Vincentians' track record elsewhere: I regard that as a potential game changer when the airport's provision of passenger services returns as part of RiverOak's infrastructure development. Thanet District Council's Local Impact Report completely ignores it, and in doing so it demonstrates once more than the LIR is misleading or inadequate.

21. There's further evidence for my suggestion that the airport will likely attract more visitors to Thanet, not fewer, should the Application before the Examining Authority be granted development

consent. A clear sign of that can be found on p. 11 of that same November 2018 document cited in para. 19, supra. In that document it is recorded that nearly half of all visitor nights are attributable to study visitors: 551,000 of those overseas nights, 49% of the total of overseas visitors. A considerable number of those come to Ramsgate and always have: institutions like Churchill House School of English have had an outstanding reputation, but Broadstairs has Kent School of English and a number of sister institutions, as does Margate, and those matter, too. In terms of the effect of those upon employment, the last page of the above document shows "Thanet Language Schools – Figures for 2017 compared to 2015 show an 11% increase in volume. Southeastern - Comparison stats for 2015 and 2017 - For travel to Margate, Broadstairs and Ramsgate only, journeys on Off-Peak products increased by 33% from April 2016 to March 2017 compared to the previous year." The return of the Airport and its proximity to language schools in Thanet and East Kent will GROW, not REDUCE the appeal of those schools to overseas medium and long-stay visitors.

22. And the same study reports, too, tellingly, on the "Number of Actual Jobs", on p. 22, "The model generates estimates of full time equivalent jobs based on visitor spending. However, the total number of actual jobs will be higher when part time and seasonal working is taken into account. The full time equivalent jobs arising directly from visitor spending are converted into actual jobs using information from business surveys in the sectors receiving visitor spending (principally accommodation, food and drink, retail, attractions, transport). In general, the conversion factor between full time equivalent jobs and actual jobs varies around 1.5 in those sectors. The indirect and induced jobs arise across a much wider range of employment sectors. Therefore, the average 1.16 for all sectors based on Census of Employment data has been used to convert full time equivalent jobs in this sector to actual jobs. The employment estimates generated by the model include both self-employed and employed people supported by visitor expenditure. The model also includes an estimate of the additional jobs arising in the attractions sector, which are not related to visitor expenditure. *However, the numbers do not include other tourism-related employment such as jobs in local authorities arising from their tourism functions, e.g. tourist information staff, additional public health, parks and gardens, public conveniences, maintenance sections and jobs arising from capital investment in tourism facilities.*" [Emphasis added].

23. One would think that Thanet District Council would have been mindful of the effect that the Airport's return coupled with the revaluation of its business rates contribution (which during the relevant time will come to Thanet District Council, not to Central Government) would dramatically affect the level of employment and public services that the local authority itself could provide as a result not only for the benefit of visitors but for all of the businesses and residents of Thanet and those for whom TDC contributes shared services through East Kent Shared Services.

24. Is it right and proper that TDC should take no account of this in their Local Impact Report? That's really up to the Senior Management Team, but I believe that the views of local residents and the whole picture, too, do matter, and that those should be taken into account by the Examining Authority.

25. Further, I hope that the Examining Authority will:-

25.1. **DIRECT** Thanet District Council to provide statistics on the number and spending of domestic and overseas visitors and staying visitors who come to *each one* of the Thanet towns so that they can be properly assessed in context, and

25.2. **DIRECT** Thanet District Council to estimate how much the rateable value of the whole of the airport (and its several parts) following development consent would generate for TDC to collect each year upon the completion of *each one* of its projected phases of infrastructure development across the next twenty years.

25.3. Should Thanet District Council continue to fail to provide that information, it is my submission that the Local Impact Report should be regarded by the Examining Authority as unfit for purpose and deficient in these key regards.

26. I also wish to submit further evidence regarding the role that **business rates** have in providing enhanced public services that Thanet District Council provided to all of us in Thanet and in Thanet's share of East Kent Shared Services and how the Manston Airport infrastructure and economic impact may affect that.

26.1. It is through *lack of sufficient revenue* that Thanet District Council is divesting itself of prime real estate including the Council's own headquarters, public toilets throughout tourist areas, historic buildings that the Local Authority owns and which have been scandalously neglected and some of which, like the Ramsgate Motor Museum, risk catastrophic collapse, all while the local authority has been failing to maintain public gardens, fountains, cliff-top lifts, and raising parking charges to levels that appear to surpass those of all or our neighbouring authorities, all to the despair of local traders, visitors and residents. It is also this which has led to failures to maintain verges, reductions in 'care in the community' and therefore of vulnerable local residents, failures to provide sufficient social housing to meet local needs, failures to maintain public footpaths, failures to provide the individual towns with the level of public funding that the towns require to carry out their own programmes for maintenance of local amenities including Ramsgate Harbour itself, its inner basin, the harbour arms and their inner spaces, similar failures in respect to the Margate Harbour arm, disrepair of the Margate Winter Gardens, the Margate Town Hall, threats to close the Margate Museum and the Ramsgate Maritime Museum, and neglect of graffiti which desecrates our towns to the despair of residents and visitors alike. It is obvious that the attractiveness and merit of what a tourist destination has to offer will affect the number of visitors and the likelihood that what they see and experience will impact upon the likelihood that those visitors and others will come again.

26.2. I urge the Examining Authority to **DIRECT** Thanet District Council to provide figures on how far its ability to fund public services has fallen since the airport closed, and what amount of funding would be required for Thanet District Council to restore the level of services the old Boroughs of Ramsgate, Margate and Broadstairs spent on such services that supported tourism (including the parks and gardens and sea fronts) back in the heyday of these towns in the 1950s – 1960s and indeed at all times prior to the formation of Thanet District Council: how far would increased rates and rises in employment from the scale of airport infrastructure redevelopment help to address that deficit to the benefit of the Council and the public interest?

27. Thanet District Council does not publish ward-level data on how much is raised in council tax and in business rates within each one of the wards in the District. I urge the Examining Authority to **DIRECT** Thanet District Council to provide such information so as to put the complaints of a relatively small number of local residents in three or four Ramsgate wards into their proper context which is the fact that a balance must be struck between what happens there (if proven to be detrimental to more than a fraction of residents or businesses) and what happens across Thanet as a district and the neighbouring local authority districts of Canterbury and Dover. The systemic failures of Thanet District Council, whether due to bad luck, bad management, poor staffing levels and morale, or inadequate funding, COULD be addressed if a great deal more money could be brought into the towns and into the District Council's financial accounts.

28. I offer in evidence a commented and highlighted spreadsheet that uses FOI data that has been published on the Thanet District Council web portal.

28.1. Through this spreadsheet, last updated in December 2018 but apparently updated quarterly, we can see what revenue the Council derives from commercial rates, from which establishments, at what rateable values, whether at full rates or at a reduced rates, and how many of those premises are exempt from business rates by reason of having an RV of less than £15,000.

28.2, It is my belief that this suggests that after the revaluation of the airport upon completion of each successive phase of its infrastructure redevelopment, the income produced from the airport, if properly revalued, will not only have a huge effect upon the services and employment that Thanet District Council can provide for the benefit of the district and its visitors but also will enable the local authority to keep future business rates everywhere in the district, and council tax rises, to a minimum or even reduce them.

28.3. Once more, I believe, the information conveyed in this spreadsheet shows significant issues that are not addressed in TDC's Local Impact Report submitted to the Examining Authority, and to that degree, too, I believe that the LIR is unfit for purpose.

28.4. The Airport and its direct, indirect, induced and catalytic job impacts, and its contributions to business rates that can revitalise our local public services are key issues, but the sources of much of the power from the rest of our local economy have not been properly addressed in the LIR either, as the FOI spreadsheet on business rates shows.

28.5. The airport can multiply the potential for economic growth in Thanet that at present can be found more in the industrial estates of Thanet than in the café culture of Ramsgate. That is a dimension that whoever has overseen the preparation of Thanet District Council's Local Impact Report has apparently airbrushed out of the picture. the FOI data, and my indicative efforts to show how meaningful it is, may redress that balance, and it is in that spirit that I offer it to the Examining Authority for consideration.

29. The Council's Senior Management Team evidently purports to believe that Stone Hill Park's plans for the redevelopment of the disused Manston Airport site offer the District best value for money.



29.1. That appears to be predicated in large measure on the expectation of windfall sums to Thanet Council from the Central Government that are given out to support public services for a period of four years after the construction of new houses. I understand that the relevant sums amount to £6000 per annum for a period of four years in respect to each new dwelling. But in truth, that won't be sustainable in the long run.

29.2. That won't produce significant new levels of permanent employment and certainly not at the scale that RiverOak's plans are likely to produce.

29.3. Stone Hill Park's proposed development is highly unlikely to be approved by the Planning Committee because that project is highly speculative, doesn't conform to existing permitted uses, hasn't satisfied statutory authorities and is unlikely ever to be able to do so in large part because of the acquirer, and because the DCO project has already been confirmed as a Nationally Significant Infrastructure Project which the Stone Hill Park development can never become, has far more benefits than the housing plan can ever produce, and because there are any number of alternative housing and mixed use sites available in East Kent, not just in Thanet but in neighbouring districts, whereas the airport's location is fixed, long-standing and well-supported by not only the overwhelming majority of residents and businesses but also by their District Council's elected Members.

30. Further, it is clear that the Stone Hill Park plan will not produce a rapid enough rise in the number of new homes in Thanet, even if granted planning and building consent, to resolve TDC's critical shortages of revenue.

30.1. They will only be able to commit to a small number of new houses each year because selling off larger plots for development will expose their builders or themselves to much higher infrastructure costs in terms of roads, schools and public utility provisions.

30.2. In case of RiverOak, the scale of infrastructure development on the site will ensure that public service infrastructure that will be paid mainly from overseas inward investment brought in by the developers.

30.3. Stone Hill Park does not appear to be in a position to match that within the same time scale, nor will it attract the same level of revenue for the Council, and its gridlocking of Thanet, at the centre of the island, would be disastrous for all of us who live in Thanet.

30.4. In any case, it is clear that the speculative Stone Hill Park plans for the site are not relevant to the evaluation of the **merits** of **RiverOak's** plans, there is a rebuttable presumption that development consent will be granted for any NSIP Application accepted for Examination under the Planning Act 2008 as amended, and I would expect the Examining Authority to give Stone Hill Park's speculative plans for the site little or no weight.

31. Having regard for the new Directions issued in a Rule 8(3) Letter by the Examining Authority on 6 March 2019, I shall at this time defer any retailed response to the No Night Flights group's submissions that pertain to documentation accepted after Deadline 3 that now will be accepted by Deadline 5 on 29 March. As for much of the rest of the No Night Flights Submissions (and those of

groups that appear to owe their existence to the strategies and contentions put forward by NNF), I note that a lot of it merely repeats very old evidence submitted by NNF that remains wildly out of date and irrelevant, even had it once been true in foregone years (which I do not admit has ever been persuasive or valid).

32. I also will defer my responses to No Night Flights' submissions on the adequacy of the Azimuth Report and to Funding issues until Deadline 5 when I will have seen RiverOak's reply submitted to Deadline 4.

33. I am aware that in social media opponents of the airport and its reopening have responded derisively to videos that have been submitted on behalf of SMAa. These include Videos A and C that have now appeared as Late Submissions accepted for Deadline 3.

33.1. Speaking as an individual I strongly feel that those videos, and any number of other videos and photographs showing events that occurred during that period, should be regarded as compelling evidence of the passions that were unleashed after the airport closure occurred.

33.2. These videos spoke for the vast majority of residents of Thanet, and the aerial video of a flight over the airfield and the immediately surrounding area demonstrates compellingly that the greater part of the landscape is not a built-up area but has had a rural character, and so it continues to be, apart from the creation of several industrial estates with several hundred units, the occupants of which must all have known of RiverOak's plans and the fact that no other viable plan has been tabled for the creation of any different kind of airport project.

33.3. The majority of the occupants of the units of those estates are covered at present by small business exemptions from payment of any business rates, but after all business rates are collected and retained by the local authority, it is not at all clear that increases in business rates will not occur without the massive revaluations of the airport's business rates that will flow from successive stages of the RiverOak's construction programme that forms part of the draft Development Consent Order that I expect to be recommended for approval by the Examining Authority and then consented by the Secretary of State for Transport.

33.4. What it also shows is that there are comparatively few dwellings within the area covered by that flight and off into the distance. While it is true that the village of Manston and a few houses that were formerly used as married officers' quarters near the top of Manston Court Road are very near the airport, no-one would live there who was not more than willing to live next to an airport. I know several persons who do live there, and they are passionately in favour of Manston Airport's return to use as a commercially successful airport.

34. As for residents in wards under the flight path in Ramsgate, opinion may be somewhat divided but the electoral and other poll data is conclusive, as I have previously demonstrated beyond contradiction in my own contribution to the collective SMAa submission to Deadline 3, namely my Review of Multiple Chains of Evidence of Support for Manston Airport across All Wards of Thanet District Council and their Parliamentary Constituencies, 2014-2019, spreadsheeted evidence with attached notes and ward-level polling data, offered in evidence at pp, 487-545 of REP3-042, Written Submission TR020002-003349-Save Manston Airport - Oral Contributions submitted at

Deadline 1, demonstrating the overwhelming percentages of support that the return of the airport to use has had consistently over the past years and which I believe continues to the present time notwithstanding highly emotive submissions made by No Night Flights.

35. Having referred to the following documents, I have submitted or will submit them separately to be considered as attachments to this submission for reference:

35.1. My submission to Deadline 3 (including its enclosures, namely two photographs relating to the Ramsgate Divine Retreat Centre, and the Response in March 2017 to the Draft Local Plan that I believe remain pertinent to the question of whether TDC's Local Impact Report on the ROIC/RSP DCO Project is unfit for purpose): REP3-150 (TR020002-003311);

35.2. Appeal Decision by M.C.J. Nunn, Stone Hill Park Public Inquiry Decision, 13 July 2017, <https://www.supportmanstonairport.org/wp-content/uploads/2017/07/Public-Inquiry-Decision.pdf> REP4-nnn (**attached**)

35.3. My own contribution to the collective SMAa submission to Deadline 3, REP3-042 (TR020002-003349), cited in para. 34, *supra*;

35.4. A source document from TDC's portal at <https://www.thanet.gov.uk/info-pages/business-rates-data-report/> REP4-nnn (**attached**), from which I have prepared a commented and analysed version, *infra*;

35.5. My Commented and Analysed version of the same. REP4-nnn (**attached**);

35.6. The Thanet Destination Management Plan 2013 produced before the closure of the airport, a five-year plan that led to much of the present-day's growth in tourist culture within Thanet: <https://www.visitthanetbusiness.co.uk/destination-management-plan/thanet-destination-management-plan-september-2013/> (**attached**);

35.7. The Cambridge Economic Impact Model 2017 for Thanet (introduction) <https://www.visitthanetbusiness.co.uk/business-support/research/cambridge-economic-impact-model-2017/>, REP4-nnn (TR020002-003677TR020002-003677);

35.8. The Cambridge Economic Impact Model for Thanet (Results for 2017), November 2018 <https://www.visitthanetbusiness.co.uk/media/3014/1-economic-impact-of-tourism-thanet-2017-1.pdf>, REP4-nnn (TR020002-003349).

36. As I have indicated above, I will refrain at this juncture from offering further evidence that bears upon what I believe to be the highly biased way in which the Senior Management Team and certain other responsible officers at Thanet District Council have conducted themselves in relations with the present Application from the time ROIC sought to work with TDC as an indemnity partner with a view to acquiring the airport to run as a cargo hub alongside other airport services, to its development by as an NISP by RSP as ROIC's successor in time. At the present time, I am not persuaded that it will be necessary to "go there", but I am fully prepared to do so if need be.

Dr. R. John Pritchard



## Appeal Decisions

Inquiry held on 14-17 March 2017

Site visit made on 17 March 2017

**by M C J Nunn BA BPL LLB LLM BCL MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 13<sup>th</sup> July 2017**

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### **Appeal A Ref: APP/Z2260/W/15/3140995 Building 1, Former Manston Airport, Kent, CT12 5BL**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for planning permission.
  - The appeal is made by Lothian Shelf (718) Ltd against Thanet District Council.
  - The application Ref: F/TH/15/0460 is dated 15 May 2015.
  - The development proposed is described as 'change of use of Building 1 from sui generis to flexible B1(b-c), B2 and B8 for a temporary period of 3 years'.
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### **Appeal B Ref: APP/Z2260/W/15/3140990 Building 2, Former Manston Airport, Kent, CT12 5BL**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
  - The appeal is made by Lothian Shelf (718) Ltd against the decision of Thanet District Council.
  - The application Ref: F/TH/15/0457, dated 15 May 2015, was refused by notice dated 22 October 2015.
  - The development proposed is described as 'change of use of Building 2 from sui generis to flexible B1(b-c), B2 and B8, small extension, marking out of car parking, and associated works'.
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### **Appeal C Ref: APP/Z2260/W/15/3140992 Building 3, Former Manston Airport, Kent, CT12 5BL**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for planning permission.
  - The appeal is made by Lothian Shelf (718) Ltd against Thanet District Council.
  - The application Ref: F/TH/15/0459 is dated 15 May 2015.
  - The development proposed is described as 'change of use of Building 3 from sui generis to flexible B1(b-c), B2 and B8'.
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### **Appeal D Ref: APP/Z2260/W/15/3140994 Building 4, Former Manston Airport, Kent, CT12 5BL**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for
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planning permission.

- The appeal is made by Lothian Shelf (718) Ltd against Thanet District Council.
  - The application Ref: F/TH/0458 is dated 15 May 2015.
  - The development proposed is described as 'change of use of Building 4 from sui generis to flexible B1(b-c), B2 and B8'.
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## Decisions

1. Appeals A, B, C and D are all dismissed.

## Procedural Matters

2. The single reason for refusal in respect of Appeal B was: "the proposed development, by virtue of the loss of a building for airport use, would create the potential need for additional buildings within the countryside and would not constitute essential airside development, contrary to Thanet Local Plan Policies CC1 and EC4 of the Thanet Local Plan, and Paragraphs 14 and 17 and guidance within the National Planning Policy Framework". With regards to Appeals A, C and D, the Council failed to determine the applications within the prescribed period. On 17 February 2016, the Council's Planning Committee resolved that, had it determined the applications, it would have refused permission for these applications for essentially the same reason as for Appeal B.
3. The Council initially resisted these appeals, and produced Statements of Case urging their dismissal. Subsequently, the Council indicated<sup>1</sup> that it no longer raised any objections to the four appeals, subject to the imposition of appropriate conditions. This followed the publication of a Report by AviaSolutions<sup>2</sup> into the commercial viability of the airport.
4. The Council's representative did not present any formal evidence to resist the schemes, apart from providing an opening statement<sup>3</sup> setting out the new position, but attended throughout to provide support to the Inquiry and to participate in the discussion about conditions.
5. The Council, during the processing of the planning applications, revised the descriptions of the schemes, removing the 'flexible' nature of the uses sought. For the avoidance of doubt, I have dealt with the appeals as originally submitted on the basis of the 'flexible use'. Appeal A, concerning Building 1, relates to a change of use for a temporary period for three years, whereas in Appeals B, C and D, relating to Buildings 2, 3 and 4 respectively, the development is sought on a permanent basis.
6. RiverOak Strategic Partners Ltd ('RSP') appeared at the Inquiry as a Rule 6 Party, and gave detailed evidence inviting me to dismiss the appeals. RSP are promoting a project to reopen the airport. Although RSP currently have no legal ownership interest in the land, they are preparing to make an application for a Development Consent Order (DCO) to re-establish a predominantly cargo based aviation use at the site and are currently engaged in discussions with the Planning Inspectorate on this matter.

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<sup>1</sup> Letter dated 15 December 2016

<sup>2</sup> Report on the Commercial Viability of Manston Airport, AviaSolutions (September 2016) [CD 14.2]

<sup>3</sup> Inquiry Document 2

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7. A DCO is the means of obtaining permission for developments categorised as Nationally Significant Infrastructure Projects. Such consents are assessed under a separate regime to these appeals and it is not my role to express a view on the matter of any forthcoming DCO, or to prejudge its findings. I also note that, given that the site is not currently in the ownership of RSP, and because acquisition through negotiation with the owners has been unsuccessful, the DCO process is likely to entail the acquisition of the appeal site under compulsory purchase powers, for which a compelling case in the public interest will have to be shown. Again, this is not a matter for this inquiry.

### **Main Issue**

8. The main issue in all four appeals is the acceptability of the proposals having regard to the adopted development plan and national policy, and whether there are material considerations to justify a determination other than in accordance with the development plan.

### **Reasons**

#### *Background*

9. Manston was first used as an airfield from around 1915-16. The runway was built in the 1940s and civilian use began in the 1950s and 1960s. The Ministry of Defence sold RAF Manston in 1998, and Manston Airport has been in various ownerships since. The four buildings subject of these appeals fall within the confines of Manston Airport, itself located outside the urban area. Airport activities ceased in 2014 and much of the necessary operational aviation infrastructure and equipment has now been removed. The airport is now closed and has no aerodrome licence.
10. Building 1 is located close to the main terminal building, whereas Buildings 2, 3 and 4 are all clustered along the northern boundary of the Airport adjacent to, and accessed from, Spitfire Way. Building 1 is a substantial aircraft hangar, with large opening doors to allow aircraft access. Building 2 is of a more modern design and construction than the other three buildings, with openings to the front and rear. Building 3 has front and back sliding doors. Building 4 is significantly smaller than the other appeal buildings. They were previously used respectively for aircraft maintenance; cargo handling, storage and produce inspection; and to quarantine and inspect animals. Building 4 is now occupied by a business. The buildings vary in condition, with Buildings 1 and 3 appearing to be in a relatively poor condition, and 2 and 4 in a fair condition.

#### *National and Local Policy Context*

11. The relevant legislation<sup>4</sup> requires that the appeals be determined in accordance with the statutory development plan unless material considerations indicate otherwise. The statutory development plan comprises the Thanet Local Plan ('the Local Plan'), adopted in June 2006.
12. The Local Plan, in its chapter on Economic Development and Regeneration<sup>5</sup>, recognises Manston Airport as an important regional hub and business location,

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<sup>4</sup> Section 38(6) of the Planning and Compulsory Purchase Act 2004

<sup>5</sup> Chapter 2

and notes that its proximity to business parks ensures a key role in the economic regeneration of the area<sup>6</sup>. The Local Plan also records that the airport should play an important part in the economic regeneration not just of Thanet, but of the whole of East Kent<sup>7</sup>.

13. Policy EC4 of the Local Plan is of most relevance to these appeals. The Proposals Map identifies the appeal site as falling within the 'Airside Development Area'. Policy EC4 reserves such land for airside development, and states that development proposals will require specific justification to demonstrate that an airside location is essential. Paragraph 2.74 of the Local Plan defines 'airside development' as uses with an operational requirement for direct access to aircraft and therefore dependent on a location immediately adjacent to the runway or capable of direct access to it via taxiways. All four appeal schemes are for flexible business uses, rather than uses for which an airside location is essential. As such, they are in conflict with Policy EC4 of the Local Plan. This conflict with the Local Plan is not disputed by the main parties.
14. The National Planning Policy Framework ('the Framework') sets out the Government's up-to-date planning policies and is a material consideration in planning decisions. Importantly, the Framework does not change the statutory status of the development plan for decision making. However, the Framework advises at Paragraph 215 that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework. Paragraph 14 of the Framework is clear that where the development plan is absent, silent or out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
15. It is the case that the Local Plan predates the Framework. Nonetheless, the Framework states that policies should not be considered out of date simply because they were adopted prior to the Framework's publication<sup>8</sup>. The Local Plan, as the appellant notes, is formally 'time expired', being designed to provide policy guidance up to 2011<sup>9</sup>. However, the mere age of a plan does not mean that it loses its statutory standing as the development plan. Furthermore, I find the overall approach of Policy EC4 to be consistent with the Framework. This recognises that plans should take account of the growth and role of airports and airfields in serving business, leisure, training, and emergency service needs<sup>10</sup>.
16. Policy EC4's approach is also consistent with the Government's Aviation Policy Framework (APF)<sup>11</sup>. This recognises, amongst other things, that the aviation sector is a major contributor to the economy, facilitating trade and investment. The APF supports growth within a framework that maintains a balance between the benefits of aviation and its costs, particularly its contribution to climate change and noise. The APF also states in the short to medium term, a key

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<sup>6</sup> Paragraph 2.4

<sup>7</sup> Paragraph 2.51

<sup>8</sup> Paragraph 211

<sup>9</sup> Local Plan, Page 5 [CD12.1]

<sup>10</sup> Paragraph 33

<sup>11</sup> Aviation Policy Framework, March 2013 [CD 11.2]



- priority is to work with the aviation industry and other stakeholders to make better use of existing runway capacity at all UK airports<sup>12</sup>.
17. It is certainly the case that the Local Plan was written and came into force at a time when the airport was operational. For this reason, the appellant contends that the Local Plan policies in relation to the airport are couched in terms that are plainly out-of-date, and that whilst some weight attaches to them, it must be limited because of changed circumstances at the site, namely the closure of the airport<sup>13</sup>. Indeed, the Local Plan states that the Council 'should plan for 1 million passengers, and 250,000 tonnes of freight per annum by the end of the Plan period'<sup>14</sup> which given subsequent events, was clearly optimistic.
18. Whilst the fact that the airport is not currently operational is an important material consideration in these appeals, it does not necessarily follow that the closure of the airport in 2014 means that the policies of the Local Plan should automatically be accorded less weight, or that they are necessarily out of date. It can often be the case that a landowner's aspirations for the use of a particular site may differ from those purposes identified in a statutory development plan. That fact does not, of itself, reduce the weight of the plan or its policies. If that were so, there would be little purpose to the statutory planning system, or identifying and allocating land for specific purposes. There is nothing before me to suggest that Policy EC4 only applies to an operational airport.
19. To sum up, I find the overall approach of Policy EC4 to be consistent with the Framework, and national aviation policy, notwithstanding its age and the fact it was drafted prior to the publication of the Framework. To that extent, I consider Policy EC4 continues to carry significant weight in the overall planning balance and that Paragraph 14 of the Framework does not apply in this case. However, it is relevant to consider whether there are other material considerations that warrant determining the appeals other than in accordance with the development plan. These considerations include the possibility of airport activities resuming in the future. I deal with this below.

### *Emerging Policy*

20. A new Draft Local Plan is currently under preparation. The January 2015 Preferred Options Consultation sought, under Policy SP05, to designate Manston Airport as an 'Opportunity Area' for the purpose of preparing an 'Area Action Plan' (AAP) for the site. The AAP was to consider the 'retention, development and expansion of the airport and aviation operations', while 'exploring alternative options for the future development of the area for mixed-use development'.
21. Proposed revisions to the Draft Local Plan were published for consultation which took place between January 2017 and March 2017. The 2017 version of Policy SP05 takes a different approach in respect of the airport in that it is allocated as a 'mixed use settlement' with the capacity to deliver at least 2,500 homes and up to 85,000 sqm of employment and leisure floorspace. The

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<sup>12</sup> Paragraph 10

<sup>13</sup> Inquiry Document 1, Paragraph 10

<sup>14</sup> Paragraph 2.65

Council acknowledged that the Draft Plan is in 'its comparatively early stages'<sup>15</sup> and that the latest version is still subject to various outstanding objections, including in respect of Policy SP05.

22. The future of the airport will no doubt be considered in a future Examination of the Local Plan. As a strategic matter, it is also, as the Council notes, an issue that is likely to be relevant to the Duty to Co-operate<sup>16</sup>. The current stage of the Draft Local Plan means its policies may be subject to change. In these circumstances, and in accordance with Paragraph 216 of the Framework, little weight can be given to the Draft Local Plan at this time.

*Relevance of Paragraph 22 of the Framework*

23. This states that planning policies should avoid the long term protection of sites allocated for employment use where there is *no reasonable prospect* of a site being used for that purpose. The paragraph continues that where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses should be treated on their merits, having regard to market signals and the relative need for different land uses to support sustainable local communities.
24. Applying Paragraph 22, RSP argue that the land is reserved for a specific employment use, namely aviation use, by virtue of Policy EC4, and any change to a general B1 (b) and (c) B2 and B8 would constitute an alternative use in terms of Paragraph 22, for the purposes of Policy EC4. The appellant, by contrast, takes a broader interpretation of Paragraph 22 contending that since the proposed uses are also employment uses, there is no conflict with the underlying purposes of Paragraph 22. In other words, there is nothing in the Paragraph implying that it applies narrowly only to aviation use, and that it should be applied as written without imputing other meanings. On this basis, the appellant says that application of the test in Paragraph 22 does not assist much in assessing these appeals, if at all.
25. It seems to me that the precise meaning of Paragraph 22 is somewhat ambiguous and open to interpretation. I accept that the third sentence of Paragraph 22, unlike the first, refers to 'the allocated employment use' rather than 'employment uses' more generally. This lends weight to RSP's notion that, if applying Paragraph 22, it should be treated as referring to the specific airport employment use, by virtue of Policy EC4 of the Local Plan. However, there is a danger of an overly narrow or legalistic approach. Moreover the precise meaning of '*no reasonable prospect*' in this context is far from clear.
26. In my view, the test set out in Paragraph 22 is of limited assistance in determining the weight to the development plan. In any event, it cannot displace the approach set by statute, namely whether the appeals should be determined in accordance with the adopted development plan, or whether material considerations suggest otherwise. It is that latter approach that I prefer in assessing these appeals.

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<sup>15</sup> Inquiry Document 2, Paragraph 9

<sup>16</sup> Inquiry Document 9, Paragraph 1.2

*Possibility of airport use resuming*

27. The appellant is of the view that there is not a realistic prospect of the airport use recommencing<sup>17</sup>. Reliance is placed on the AviaSolutions Report commissioned by the Council and published in September 2016 which concludes there is little prospect of a financially viable airport on the site<sup>18</sup>. However, and importantly, the AviaSolutions Report makes clear that it does not offer any opinion about the reasonableness or otherwise of RSP's plans for the airport<sup>19</sup>.
28. I heard evidence that three successive owners of the airport had been unable to run it viably. Submissions were made that RiverOak Investment Corporation, based in the United States, and experienced in major projects and financially well-resourced, is an entirely separate legal entity from RSP. On this basis, RSP's financial resources and expertise, as well as their ability to re-open the airport was questioned. The appellant also highlighted that there is no information in the public domain about the likely sources of funding for the project, which will be substantial. Nor has any detailed business plan been revealed. This, it is said, calls into question the entire delivery of RSP's project for Manston.
29. Furthermore, the appellant highlights the significant environmental aspects of the RiverOak's project which have yet to be assessed or impacts mitigated. An Environmental Impact Assessment would be required, as well as a Habitats Regulations Assessment. A cargo based operation is likely to have significant transport impacts, again requiring proper assessment. Because the land is in the ownership of another party, the DCO application will require the compulsory purchase of the land, and the relevant tests will need to be satisfied.
30. On the other hand, RSP have adduced detailed aviation evidence that, contrary to the conclusions of the AviaSolutions Report, the airport could be reopened and operated viably, with appropriate levels of investment<sup>20</sup>. Detailed evidence was presented that the AviaSolutions Report was based on flawed assumptions and that the airport could be successfully developed as a mixed use airport, underpinned by a cargo operation, which could become an important infrastructure asset within the wider South East, and contribute to the local, regional and national economy. RSP were of the firm view that, subject to appropriate levels of investment, Manston would be capable of handling considerable air freight movements. The appellant did not call any aviation witnesses to directly rebut RSP's technical evidence, nor was RSP's key aviation evidence challenged<sup>21</sup>. However, the appellant made it clear that RSP's submissions on aviation were not accepted as correct.
31. Given this contradictory evidence, it is difficult to predict conclusively whether the airport will reopen or not. Indeed, no concluded view can be taken on RSP's proposals without all the information that will required for inclusion in any DCO application. It must be stressed it is not the purpose of this inquiry to

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<sup>17</sup> Planning Statement, May 2015, Paragraph 1.3 [CD 5.1]

<sup>18</sup> This Report informed the latest iteration of the 2017 Draft Local Plan in respect of Policy SP05, which allows for a range of non-aviation uses.

<sup>19</sup> Page 14, Footnote 2

<sup>20</sup> Evidence of Mr George Yerrall, Dr Sally Dixon, and Mr Chris Cain

<sup>21</sup> Neither Dr Dixon or Mr Cain were cross-examined by Mr King

judge the merits or otherwise of RSP's project, which would be a matter for any forthcoming DCO. However, in considering whether the proposals should be determined in accordance with Policy EC4 or not, it is relevant to consider, in the light of the evidence presented, and as matter of planning judgement, if there is some possibility of the airport use resuming.

32. There are clearly a number of very significant hurdles and myriad important matters to be resolved if RSP's ambitious plans are to proceed to fruition. It relies, amongst other things, on the necessary investment and ownership matters being resolved. RSP's plans would also be dependent on the environmental impacts being satisfactorily addressed and mitigated. These matters are for a future DCO application, the success or otherwise of which cannot be known at this time.
33. The appellant accepts that the possible resumption of airport use at the airport cannot be ruled out, because of RSP's emerging proposals<sup>22</sup>. I have found that Policy EC4 is consistent with the Framework, as well as national aviation policy, and should therefore continue to carry significant weight in these appeals. In these circumstances, and until a new policy framework exists at the airport, I find that the evidence at the Inquiry did not demonstrate that the likelihood of the airport reopening was so slim that the conflict with Policy EC4 should be disregarded.

*Whether the proposals would compromise the future aviation use of the airport*

34. Given there is no active aviation use at the airport, the proposals could be seen as making efficient use of existing under-used buildings, and as a pragmatic response following the airport's closure. That said, granting permission would undermine the current policy protection afforded to airport land and be seen as setting a precedent for non-airport related use. This is more likely to lead to a situation where other floorspace could become used for activities that have little or no relationship with an airport function. All the appeal buildings are specifically designed for airport related uses, and their use for non aviation uses would undermine, rather than assist, any future operation of an airport.
35. In the case of Building 1, a temporary permission is sought that would enable control over future use. This could be seen as a flexible response without prejudicing future options given that there is no presumption that a temporary grant of planning permission should be granted permanently. However, a situation could develop where significant areas could be used for temporary non aviation related purposes, undermining the underlying policy objective of the adopted Local Plan.
36. I acknowledge that Buildings 2, 3 and 4 are located towards the periphery of the site, with vehicular access from Spitfire Way. It may be the case that these buildings could be capable of use as discrete units within the airport. But this does not alter the fact that non aviation uses would compromise the objective of Policy EC4. Building 1 is not located peripherally but close to the main terminal building and its use for non airport related activity so close to the terminal building would be likely to give rise to operational difficulties were the airport use to resume.

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<sup>22</sup> Inquiry Document 20, Paragraph 18

37. It may well be the case that any successful DCO would include provision for a compulsory purchase order that would enable full vacant possession of the entire site to be secured, and that the proposed appeal schemes would not affect this process. In other words, were the site to be compulsorily acquired for the purposes of reopening the airport as part of a DCO, any existing occupiers could be given appropriate notice to leave their premises. However, I see no good reason to grant permission for non-aviation uses contrary to adopted development plan policy on the basis that non-conforming uses could be reversed in the future through a DCO. This would amount to granting permission under one regime only to override it under another.
38. Prior to withdrawing opposition to these appeals, the Council's actual and putative refusal grounds referred to the loss of buildings for aviation use potentially creating the need for additional buildings within the countryside, where under Policy CC1, there is a presumption against such development. The appeal buildings are all designed for specific aviation related uses and, as a consequence, new buildings could be required to replace those 'lost' to other non-aviation uses. That said, until any future airport operator is known, the exact operational requirements cannot be certain and it cannot be accurately predicted whether any future scheme would give rise to the need for additional buildings. This matter cannot be determinative in these appeals.
39. To sum up, even allowing for any DCO, it seems clear to me that granting permission for these schemes, contrary to Policy EC4, would be likely to compromise any future aviation use of the airport. It might set a precedent which would be difficult to resist. Consistent application of Policy EC4 is required to prevent the site becoming anything other than an airport, and speculative non-conforming commercial uses would undermine its designated aviation use. Indeed, the cumulative effect of such developments would mean that the airport, although currently closed, would begin to exhibit the characteristics more redolent of a business park, undermining the concept of an airport.

*The availability of employment land*

40. The Council, when it originally assessed the proposals, expressed the view that the appeal proposals were largely speculative and that alternative employment land existed within the district, including at Manston Business Park, adjacent to the airport<sup>23</sup>. The Council's review of employment sites to inform the new Draft Local Plan has revealed a significant over-supply of employment land within the district. I understand the Council is proposing to re-allocate some 30 hectares of older, less suitable, employment land for alternative uses such as housing<sup>24</sup>.
41. However, in terms of premises, the appellant contends that there is a comparatively low amount of existing floorspace available in the district, that existing industrial floorspace has consistently low vacancy rates, and that much of the existing employment accommodation is of poor quality. As part of the consultation process on the original planning applications, the Council's Head of Economic Development noted that there were very few existing units of this size within the District.

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<sup>23</sup> Council's Statement [CD 19.7]

<sup>24</sup> Report to the Overview and Scrutiny Committee, 21<sup>st</sup> November 2016 [CD13.5]

42. I accept that, with the necessary remediation and adaptation works, the appeal buildings may fill a gap in the supply of employment floorspace of this type and kind. This would bring some benefits in terms of job creation and economic activity, to which I accord some weight, but as the appellant acknowledges, such benefits would be relatively modest<sup>25</sup>.
43. Notwithstanding submissions about the paucity of existing premises of comparable size to the appeal buildings, there is plenty of land for industrial and business development in the district<sup>26</sup>. It seems to me that, were there significant demand for employment premises, they would be built out on the land already identified for that purpose. The evidence before me suggests that premises are also available in the wider East Kent area since the tenant that was originally envisaged for Building 2 has found alternative accommodation. Overall, I am not persuaded that a lack of alternative employment land or premises is a reason to allow these appeals at this airport location, or that it justifies departure from Policy EC4 of the Local Plan.

*Other matters*

44. The appellant's submissions make it clear that there is no intention to re-open the site as an airport, since it was acquired with the aspiration to promote a comprehensive redevelopment for mixed uses<sup>27</sup>. Indeed, it is promoting a comprehensive mixed use scheme, comprising amongst other things some 2,500 new dwellings and up to 85,000 sqm of employment and leisure floorspace, retail, education, sport and recreation uses as well as open space, and associated infrastructure<sup>28</sup>. It is argued that this site-wide scheme would bring significant social, economic and environmental benefits. However, this scheme is not before me, and so I make no judgement on its merits.
45. Reference has been made to 'Operation Stack'<sup>29</sup> which allows part of the runway to be used for non-aviation uses, namely the stationing of goods and vehicles, the use of the control tower as a co-ordination centre and the erection of temporary structures. To date, it has not been used for that purpose. Drawing parallels with the appeal proposals, the appellant argues that 'Operation Stack' indicates the acceptability of a non-aviation use on a temporary basis at the site, which would not prejudice the potential longer term use of the airport.
46. However, I do not consider that this temporary Order lends any support for the appeal proposals. It seems to me that 'Operation Stack' is a short term temporary measure of expediency to alleviate acute and specific problems of traffic congestion on the M20 and surrounding roads, until a longer term solution is found. It does not grant permanent planning permission at the airport for non aviation uses, in the way that three of the four appeal proposals would. The circumstances are markedly different, and I consider that 'Operation Stack' cannot provide justification for these appeals.

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<sup>25</sup> Inquiry Document 20, Paragraph 59

<sup>26</sup> Ibid, Paragraph 56

<sup>27</sup> Proof of Evidence of Nicholas Alston, Paragraph 6.29

<sup>28</sup> Stonehill Park Planning Application Summary Document [CD 18.2]

<sup>29</sup> Town and Country Planning (Operation Stack) Special Development Order 2015 & Town and Country Planning (Operation Stack) Special Development Order 2016

## **Overall Conclusions and Planning Balance**

47. The relevant legislation requires that the appeal be determined in accordance with the statutory development plan unless material considerations indicate otherwise. The Framework states that proposals should be considered in the context of the presumption in favour of sustainable development, which is defined by the economic, social, and environmental dimensions and the interrelated roles they perform.
48. I have carefully considered the various arguments made by the appellant in support of these appeals. The re-use of the buildings would generate certain economic benefits, although as the appellant notes, they would be relatively modest. The proposals could be seen as making efficient use of existing under-used buildings, and as a pragmatic response to the fact that the airport has not been operational since 2014. I have also weighed in the balance that the Council has changed its original stance, and is no longer resisting these appeals.
49. Balanced against these factors is the conflict with the adopted development plan, which recognises the economic importance of the airport and safeguards the appeal site for aviation uses. Such an approach is in accordance with the Framework and with national aviation policy. In these respects, I consider Policy EC4 continues to carry significant weight in the overall planning balance. I make no judgement on the merits or otherwise of RSP's plans, or their future success. However, given a DCO application is currently being prepared, the possibility of the site being used as an airport in the future cannot be ruled out. This being so, and until a new policy framework exists at the airport, I see little justification for departing from adopted development plan policy which identifies the appeal site as falling within the 'Airside Development Area' where aviation uses are appropriate.
50. I have taken account of the appellant's contention that the resumption of airport use by RSP would not be prejudiced or compromised if these appeals were allowed because any future DCO would likely include compulsory purchase powers to secure vacant possession of the airport. However, I am not persuaded that granting permission for development that does not accord with the development plan can be justified on the basis that compulsory purchase powers can be used to reverse it in the future.
51. I have taken into consideration the latest emerging local planning policy which proposes to re-designate the airport for mixed use development. However, the consultation process has only recently occurred and the emerging Plan is subject to various outstanding objections and its policies may change. In accordance with Paragraph 216 of the Framework, I find little weight can be given to the emerging policy.
52. Overall, I conclude that the appeal schemes would conflict with Policy EC4 of the Local Plan, as well as its wider economic development and regeneration objectives. The proposals would conflict with the Council's current approach to the location of new development within the airport, which is consistent with national policy. The benefits of the scheme put forward by the appellants do not justify departure from Policy EC4 of the Local Plan. Hence I find there are no material considerations of sufficient weight that would warrant a decision

other than in accordance with the development plan. Accordingly, I conclude that the appeals should be dismissed.

*Matthew C J Nunn*

INSPECTOR



## APPEARANCES

### FOR THE APPELLANT:

Mr Neil King QC of Counsel, Instructed by Herbert Smith  
Freehills LLP

He called

Mr Nicholas Alston Director, Bilfinger GVA

### FOR RIVEROAK STRATEGIC PARTNERS:

Miss Suzanne Ornsby QC and

Miss Melissa Murphy of Counsel, Instructed by Bircham Dyson Bell

They called

Mr Christopher Cain Director, Northpoint Aviation Services Ltd

Dr Sally Dixon Business and Aviation Consultant, Azimuth  
Associates

Mr George Yerrall Director, RiverOak Strategic Partners Ltd

Ms Angela Schembri Planning Director, RPS Group

### FOR THE COUNCIL

Mr Iain Livingstone Planning Applications Manager, Thanet District  
Council

### INTERESTED PERSONS

Ros McIntyre No Night Flights

Dr Beau Webber Save Manston Airport Association

Mr Simon Crow

Mr Rex Goodban

Sir Roger Gale MP

Sue Girdler

## DOCUMENTS SUBMITTED AT THE INQUIRY

1. Opening Statement on behalf of the Appellants
2. Opening Statement by the Council
3. Opening Statement by RiverOak Strategic Partners Ltd
4. Statement of Dr Beau Webber
5. Statement of Ms R McIntyre
6. Statement of Mr Simon Crow
7. List of draft conditions, annotated by RiverOak Strategic Partners
8. "Caxtons" bundle comprising particulars of employment land and property in East Kent
9. Report for Council Cabinet on 20<sup>th</sup> March 2017 on Proposed Revisions to Thanet District Council's Local Plan (Preferred Options)
10. Local Plan Proposals Map
11. Statement of Mr Rex Goodban
12. Statement of Ms Sue Girdler
13. Extract of House of Commons Transport Committee Report- 'Smaller Airports', Ninth Report of Session 2014-2015, dated 9<sup>th</sup> March 2015
14. Updated Draft Schedule of Conditions
15. Submissions of Sir Roger Gale MP
16. Schedule of employment land & premises, dated 17<sup>th</sup> March 2017-04-28
17. Further details of employment land & premises
18. Updated Statement of Common Ground, dated 17<sup>th</sup> March 2017
19. Closing Submissions of RiverOak Strategic Partners
20. Closing Submissions of the Appellant























































Company Name	Address	Postcode	County	Region	Country	Occupancy	Area (sqm)	Value (£)	Completion Date	Notes
Rampage Domestic Ltd	21 King Street	RM1 2AA	Essex	South East	UK	Occupied	1,000	100,000	2018/01/01	
... (thousands of rows) ...	...	...	...	...	...	...	...	...	...	...
Colson Financial Services Limited	113 Attercliffe Road	S6 4JH	West Yorkshire	Yorkshire and the Humber	UK	Occupied	1,000	100,000	2018/01/01	





































<b>Code</b>	<b>Description</b>
CASCM	Sports Mandatory
DISC	Discretionary Relief
LNEWS	Local News
LOCAL	Local Discretionary Fund
MAND	Mandatory Relief
NEWBLD	New Build Relief
PUBRLF	Pub Relief
RURDGS	Discretionary RR General Stores
RURDPH	Discretionary RR Public Houses
RURDPO	Discretionary RR Post Offices
RURDPS	Discretionary RR Petrol Filling Stations
RURMGS	Mandatory RR General Stores
RURMPH	Mandatory RR Public Houses
RURMPO	Mandatory RR Post Offices
RURMPS	Mandatory RR Petrol Filling Stations
TOPUP	Top-Up Relief

<b>Code</b>	<b>Description</b>
3MTHS	3 Months Exemption
ADMIN	Company in Administration
BANKRU	Owner Bankrupt
CHAR	Charity Exempt from EPR
CROWN	Property Kept Vacant by Crown Exemption
DECD	Pers Reps Entitled to Possession Exemption
INDUST	Industrial Exemption
LAND	Exempt from EPR
LIQUID	Liquidator Entitled to Possession
LISTED	Listed Building Exemption
MINRV	Minimum RV Exemption
PROHIB	Occupation Prohibited Exemption
TOR	To be taken out of Rating
TRUSTE	Trustee Entitled to Possession Exemption
WINDUP	Company Subject to Winding Up Order
ZERO	Zero Rated Property





































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TOPUP	Top-Up Relief

# Thanet Destination Management Plan September 2013

Visit Thanet Business (/) / Destination Management Plan (/destination-management-plan/)  
/ Thanet Destination Management Plan September 2013

- Thanet Destination Management Plan September 2013 (/destination-management-plan/thanet-destination-management-plan-september-2013/)
- Thanet's Visitors (/destination-management-plan/thanet-destination-management-plan-september-2013/thanets-visitors/)
- A Shared Story for Thanet (/destination-management-plan/thanet-destination-management-plan-september-2013/a-shared-story-for-thanet/)
- Priority Projects (/destination-management-plan/thanet-destination-management-plan-september-2013/priority-projects/)
  - Priority One: Beach Management and Development (/destination-management-plan/thanet-destination-management-plan-september-2013/priority-projects/priority-one-beach-management-and-development/)
  - Priority Two: Coastal Regeneration (/destination-management-plan/thanet-destination-management-plan-september-2013/priority-projects/priority-two-coastal-regeneration/)
  - Priority Three: Telling Our Stories (/destination-management-plan/thanet-destination-management-plan-september-2013/priority-projects/priority-three-telling-our-stories/)
- Making It Happen (/destination-management-plan/thanet-destination-management-plan-september-2013/making-it-happen/)

## How we developed the DMP

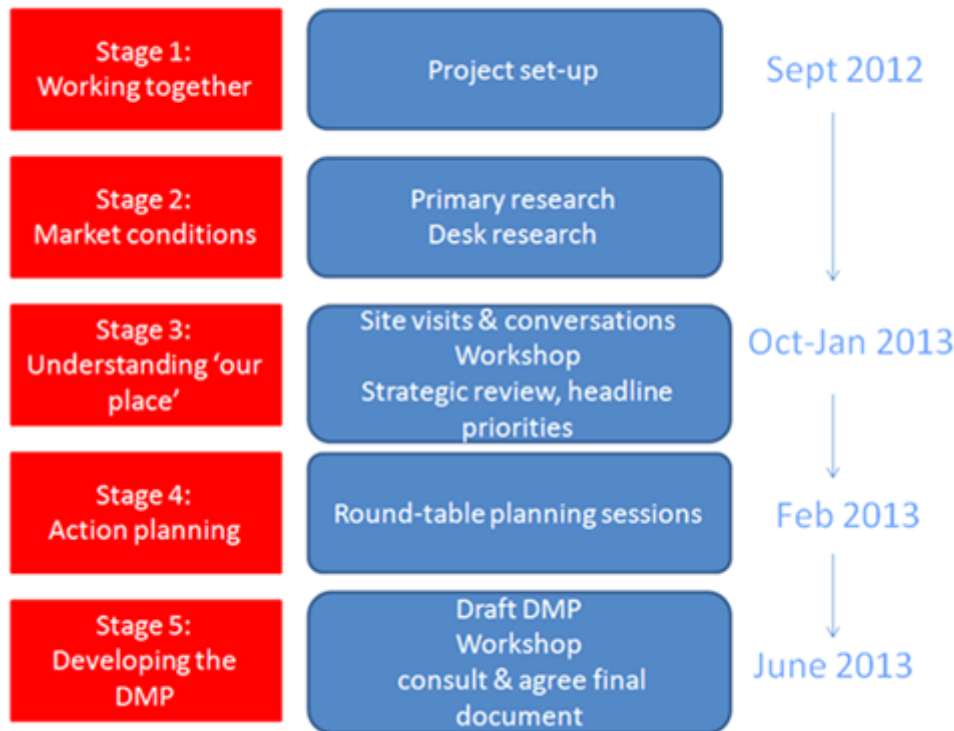
This Destination Management Plan has been developed over a 9 month period. It has been steered by a Project Group comprising representatives from Thanet District Council, key public agencies and the local industry. We have also met with further industry representatives and Council staff, presented to key groups and facilitated workshops and action planning sessions at stages throughout the development of the Plan to ensure there is buy-in to the process and the recommendations. Over 60 people – businesses and people working in the public sector - have contributed their views and been involved in helping to shape this Plan.

As part of this project, VisitKent has undertaken primary research to find out more about leisure visitors to Thanet including a survey of the views of 861 people who live, work and visit Thanet. They have undertaken a market segmentation profile of nearly 2,000 visitors to Thanet to find out more about people who are coming now and drawn on perceptions research of over 4,700 people to understand what they think about Kent as a destination. We have reviewed all the existing plans and current activity because the DMP is about adding value not about covering well worn ground and duplicating what is already happening. Visit Kent has produced a policy and strategy context paper as part of the outputs of this project and this is available as a separate volume. We reference and draw on that work here to demonstrate how the DMP will contribute to delivering regeneration and economic development policy for Thanet and for Kent.

We have reviewed the markets and identified a new market segment for Thanet that has a strong fit with the market opportunities identified by VisitEngland. We have looked at what Thanet needs to do to maximise the potential of that market over the next three years.



We have also developed a Shared Story for the destination as a way to describe what is special and different about the place, that everyone can use when they are planning how to invest in improvements and new experiences, and when they are talking to people who don't know the place. It has informed the DMP actions.



The DMP process has identified three areas for priority over the next five years. These are additional activities and need additional resources to make them happen. The process of developing the DMP has also demonstrated an appetite for tourism industry networks and for groups that enable the industry to be involved in the DMP delivery; Project Delivery Groups are built into the DMP project plans to enable this.

## What we want to achieve

Thanet is a well-established visitor destination on the Kent coast, known for its sandy beaches and the three coastal towns of Margate, Ramsgate and Broadstairs, each with a distinctive history and personality.

## The three seaside towns

**Margate** – the original seaside resort – has a strong place in the English psyche, for its long-standing reputation for traditional seaside fun, now mixed with added cultural and creative edge.

**Ramsgate** – with its Royal Harbour, ferry terminal, and Marina – faces the Continent and can feel quite cosmopolitan – witness its burgeoning waterfront bars and restaurants.

**Broadstairs** – with its clifftop promenade and retro '50s coffee bars, overlooks a quaint quayside, fishermen's cottages and sandy beach. Everything is on an intimate scale. Dickens' presence is palpable.

It has an interesting seaside heritage and a growing cultural offer. Recent investments in Turner Contemporary, new plans for the Dreamland site and the regeneration of Margate's Old Town and the redevelopment of Ramsgate Harbour have been complemented by private investment in a small but growing number of distinctive, quality places to stay and places to eat and drink. Some of that investment is by long established local businesses and some from inward investment by new small businesses. Thanet is beginning to attract

people from London to live, invest and visit and wants to attract more visitors, for them to spend more and for more of them to come for a short break rather than a day trip. It wants to invest in culturally-led tourism regeneration and to support quality.

To achieve these objectives, partners in Thanet will:

- Deliver quality experiences for existing markets, develop new experiences to grow market share and attract new higher spending visitors looking for short-breaks
- Present the three towns more strongly together, playing to the strengths of each and making it easy for the visitor to explore along the coast and to get around
- Invest in the experience of its beaches, Thanet's strongest natural assets – their development and management
- Prioritise investment in new quality character accommodation to enable Thanet to grow the short break market - to achieve longer stays and higher spend
- Make more of its location – the Isle, the big skies, the natural coastline and importantly its proximity to London by high-speed train and the market opportunities that bring
- Stimulate the environment to encourage investment in new quality visitor attractions, visitor experiences and places to stay.

## How we are going to get there

Thanet will:

ESTABLISH NEW **ways of working which are driven by a partnership** between the industry and the public sector, where Thanet District Council acts as catalyst, facilitator and partner

Recognise that **collaboration across Thanet** can build a critical mass of experiences and collaboration with East Kent more widely can open up further opportunities

Tackle some of the barriers to making things happen

Ensure tourism is one of the drivers of the local economy and put steps in place to enable that, including **supporting tourism business sustainability, growth and inward investment**

## The big picture

Tourism and the visitor economy is a priority in Thanet. There is a range of strategies and policy documents that recognise the importance of tourism and identify some of the barriers to growth. The Thanet Sustainable Community Strategy highlights current low visitor spend and the need to attract staying visitors because they have a higher value, and the Thanet Economic Strategy recognises the value of the visitor economy and the need to develop a Destination Management Plan to steer and align tourism activity.

A report to the South East LEP[1] states that the coastal communities of the south east account for 1 million people, (25% of the LEP's population), but these communities are in areas of social and economic disadvantage, well behind LEP or even national averages. The report recommends - there is a good case for a bid to the Regional Growth Fund to support seaside tourism. This would be a practical way for the South East LEP to encourage growth and jobs.

The visitor economy is at the heart of the Council's Corporate Plan and this DMP has a strong fit with the following six priorities in the Plan.

- We will support the growth of our economy and the number of people in work (Priority 1)
- We will support our community and voluntary organisations (Priority 3)

- We will support excellent and diverse cultural facilities and activities for our residents and visitors (Priority 8)
- We will support a broad range of sports, leisure and coastal facilities and activities (Priority 9)
- We will influence the work of other agencies to ensure the best outcomes for Thanet (Priority 10)
- We will protect and preserve our public open spaces (Priority 11)

### **Thanet Corporate Plan 2012-16**

[1] The Coast Communities of South East England, Recommendations to the South East LEP

The Thanet Regeneration Board identifies culture, heritage & tourism, the green economy, business growth, investing in assets and skills for employment and growth as the strategic priority themes for economic growth and regeneration.

This DMP responds to all these plans by providing clear recommendations. It focuses on a small number of strategic projects that can help realise potential, grow the visitor economy and deliver local and regional aspirations.

The newly launched East Kent regeneration blueprint, Open For Growth and East Kent's bid to become the UK City of Culture in 2017 are examples of Kent's confidence, drive for inward investment and commitment to culture and the visitor economy. In addition, Expansion East Kent, (the Regional Growth Fund Programme) is providing a £35 million programme of financial support to businesses seeking to invest in East Kent to create jobs. This DMP is well-timed to put in place new working partnerships and initiatives now to help capitalise on these and other opportunities as they progress.

In 2011 Visit Kent led on a European funding bid to develop the CAST (Coastal Actions for Sustainable Tourism) programme. Working collaboratively with coastal districts, the programme of work culminated in a shared vision for the development of Kent's coast and a clearer view of how and where the coast's visitor economy should be heading to retain its unique sense of place. The new EU Seaeconomics programme is the successor to CAST.

Kent County Council's Blueprint for the Future recognises that Kent's coast is already coming back to life and by 2020 will have the UK's most distinctive and thriving coast. The 2013-2015 Business Plan for Visit Kent has specifically identified the need to support destinations to develop Destination Management Plans in accordance with the Visit England Gold Standard, as a basis for not only best practice destination development but also to inspire local strategic planning and funding bid development.

At national level the English seaside warrants special mention because of its unique set of assets, challenges and opportunities. English Heritage provides a check list for local authorities responsible for coastal regeneration and Visit England has published a dedicated Seaside Action Plan to help maximise the potential of seaside resorts and grow the domestic visitor economy by 5% year on year. The Department for Communities and Local Government sets out a vision for seaside towns in its Strategy for Seaside Success.

However, there remain some big challenges for coastal tourism. The Kent Tourism Framework (2009) identifies three big questions - how to reach a position where individual towns work together to attract greater visitor interest rather than compete in the same markets; how to tackle the reduction in the amount of visitor accommodation which makes it difficult to attract more short breaks; and how to address the under-investment that has happened over time in the visitor economy infrastructure. This DMP is about tackling these challenges.

The Kent & Medway Tourism Development Framework identifies on-going investment in regeneration programmes and focuses on local distinctiveness as the way forward. The DMP identifies achievable actions to encourage investment in seafront infrastructure and in new visitor accommodation over the next five years. The Shared Story provides a route to help businesses market and capitalise on Thanet's distinctiveness in a joined up way.



Each of Kent's major coastal towns has seen a major reduction in their visitor accommodation stock over the last 20 years. The situation appears to have stabilised and new investment is now being made. However the towns share a need to attract more, better quality visitor accommodation in line with modern-day visitor expectations and to capitalise fully on the significant investments and improvements being made.

## Kent & Medway Tourism Development Framework – Kent County Council

The DMP delivers against the following strategic objectives of the Kent & Medway Tourism Development Framework, namely to:

- Help existing businesses improve their performance and develop further, in line with evolving market requirements
- Identify, encourage and support additional visitor economy businesses and facilities that will enhance Kent's attractiveness as a destination and increase market penetration, particularly through generating more staying visits
- Make the most of opportunities for visitor economy development afforded by on-going investment in regeneration programmes and projects
- Focus on local distinctiveness to enable Kent and its individual destinations to stand out from the crowd but also combine to offer a range of complimentary offers to potential visitors
- Ensure that key public and private sector players work together as effectively as possible towards achieving agreed tourism development priorities;
- Improve the skills of people who work in Kent's tourism industry and the quality of welcome and service received by visitors
- Deliver and sustain a quality tourism product for visitors.

The Coastal Communities Fund, Interreg V and Arts Council Funding programmes all offer potential sources of funding to help support the new activity set out in this DMP. The DMP partners are in conversation with the Arts Council about support for specific projects and DMP projects are being included within EU funding bids. The detail is set out in the Project Plans at Section 8.

## Priorities for the next five years

Research shows that visitors are overwhelmingly attracted to Thanet for its beaches and coastline. It is essential that Thanet delivers an excellent quality experience along its coast and invests in the experiences on its beaches and along its seafronts. To attract more visitors and more overnight trips, Thanet needs more character places to stay and a wider range of things to see and do during the day and in the evenings. It also needs to present a distinctive offer in the marketplace that plays to its strengths and ensures tourism businesses support that through their marketing and investment. The headline priorities for the DMP over the next 5 years are designed to help deliver these priorities:

- **Beach management and development** – to deliver a programme of prioritised beach-by-beach improvements, informed and steered by a new Beach Management Delivery Group, and to identify and deliver community and industry-managed beaches that are freely available to everyone and which incorporate the best creative and commercial ideas to enhance quality, protect the environment and deliver new distinctive experiences
- **Coastal regeneration** – to make a stronger case for tourism regeneration in specific underused or derelict coastal buildings and target inward investment to those specialist developers who can inject creative solutions and deliver new quality developments – large and small - that reinforce what is distinctive about Thanet and create much needed character accommodation
- **Telling our stories** – using the Shared Story developed for the DMP to create a stronger sense of place through a joined-up approach to marketing, information and interpretation,

including helping small tourism businesses improve the quality of their marketing through skills development and support. The emphasis is on business engagement, support for the DMP and delivering a consistent quality product.

## How will we measure success

We will use the following indicators to measure progress.

- Higher profile of Thanet as a place to visit for quality English coastline and seaside towns
- Numbers of jobs created and sustained
- Growth in volume and value of tourism
- Number of bed spaces and room occupancy
- Greater community pride and cohesion between the coastal towns
- Stronger industry and public sector partnerships
- Greater visitor satisfaction.

The Shared Story (</destination-management-plan/thanet-destination-management-plan-september-2013/a-shared-story-for-thanet/>)



See more (</destination-management-plan/thanet-destination-management-plan-september-2013/a-shared-story-for-thanet/>)

Destination Management (</destination-management-plan/>) (</destination-management-plan/>)



See more (</destination-management-plan/>)

Shared Story Toolkit (</shared-story/>)



See more (/shared-story/)

Business Support (/business-support/) (/business-support/)



See more (/business-support/)

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Thanet District Council (<http://www.thanet.gov.uk>)

Visit Kent Business (<http://www.visitkentbusiness.co.uk/>)

Website policies (/website-policies/)



# Cambridge Economic Impact Model 2017

Visit Thanet Business (/) / Business Support (/business-support/)  
 / Research (/business-support/research/) / Cambridge Economic Impact Model 2017

- Business Support (/business-support/)
- Business Support (/business-support/business-support/)
- Research (/business-support/research/)
  - Cambridge Economic Impact Model 2017 (/business-support/research/cambridge-economic-impact-model-2017/)
  - Economic Impact of Language Schools 2013 (/business-support/research/economic-impact-of-language-schools-2013/)
  - Cambridge Economic Impact Model 2015 (/business-support/research/cambridge-economic-impact-model-2015/)
  - Cambridge Economic Impact Model 2013 (/business-support/research/cambridge-economic-impact-model-2013/)
- Development (/business-support/development/)
- Tourism Accommodation Advice (/business-support/tourism-accommodation-advice/)
  - Accommodation Support and Advice (/business-support/tourism-accommodation-advice/accommodation-support-and-advice/)
- Top Reasons to Invest in Thanet (/business-support/invest-in-thanet/)
  - Blue Swift Gallery and Framing (/business-support/invest-in-thanet/blue-swift-gallery-and-framing/)
  - GB Pizza Co (/business-support/invest-in-thanet/gb-pizza-co/)
  - Sands Hotel (/business-support/invest-in-thanet/sands-hotel/)
  - The Ambrette (/business-support/invest-in-thanet/the-ambrette/)
  - The Bottleneck (/business-support/invest-in-thanet/the-bottleneck/)
  - The Crescent Victoria Hotel (/business-support/invest-in-thanet/the-crescent-victoria-hotel/)
  - The Royal Harbour Hotel (/business-support/invest-in-thanet/the-royal-harbour-hotel/)
- Training Workshops (/business-support/training-workshops/)

## Thanet's tourism economy now worth £319m as visitor numbers rise to 4.2 million in 2017

Visits to Thanet increased by 8.6% in 2017 with the district welcoming a record 4.2 million visitors, according to research released this week. The value of Thanet's visitor economy grew by 9.2% in 2017 and is now worth over £319 million.

Independent research commissioned by Visit Kent showed that the number of day trips to the Thanet district leapt by 9.9% in 2017, meanwhile the total number of nights stayed in the district increased by 4.9%.

The total number of jobs supported by tourism rose by 8.7% to 7,950, with the industry accounting for an impressive 19% of total employment across Thanet.

**Cllr Ash Ashbee, Cabinet Member for Coastal Development at Thanet District Council** said: "The results clearly show that tourism in Thanet is going from strength to strength. \*The number of day trips to the area is up by 10% which is a solid increase but in the context of the national figure of 0.8% it really is brilliant news."



'We have seen the popularity of Thanet steadily increase in recent years and its reputation as a go-to destination is now firmly established. We are so delighted that the growth we experienced previously has continued. We recognise the economic benefits that a thriving tourism offer brings to the local economy, creating jobs and driving spend in the local area.

'Our ambition is to continue to attract new and returning visitors to this beautiful destination - there are always reasons to visit Thanet. In 2019, Margate Caves is due to reopen in spring and from late September, the Turner Contemporary is hosting the Turner Prize.'

The tourism picture was rosy across the county in 2017, despite the challenges presented by ongoing Brexit negotiations. Kent welcomed 65 million visitors in 2017, and the visitor economy's value leapt by 7% to £3.8 billion.

Kent welcomed a record 64,970,000 visitors throughout 2017 with the county's tourism industry accounting for 76,828 jobs. Across the county, visitor numbers rose compared to the previous year with the highest volume of day trips, value of tourism and tourism related jobs recorded.

Kent also remains the third most visited destination outside of London for foreign visitors.

**Chief executive of Visit Kent Deirdre Wells OBE** said: "Tourism is the UK's fastest growing service sector and these figures demonstrate the contribution which our vital industry makes to the economy of Kent.

'The collective efforts of tourism businesses across the county have paid dividends and this partnership will be critical in ensuring that this growth continues during a challenging year ahead.'

She added: "Our challenge going forward will be to turn more of our day visits into overnight stays and short breaks, bringing even further growth to the county."

**Leader of Kent County Council, Paul Carter**, said: "The results from the 2017 survey commissioned by Visit Kent clearly show that the visitor economy is increasingly important to the county's future prosperity".

Thanet Cambridge Economic Impact Model 2017 (/media/3014/1-economic-impact-of-tourism-thanet-2017-1.pdf)

[Research \(/business-support/research/\)](/business-support/research/)



[See more \(/business-support/research/\)](/business-support/research/)

[Shared Story Toolkit \(/shared-story/\)](/shared-story/)



[See more \(/shared-story/\)](/shared-story/)

[Invest in Thanet \(/business-support/invest-in-thanet/\)](/business-support/invest-in-thanet/)



[See more \(/business-support/invest-in-thanet/\)](/business-support/invest-in-thanet/)

[Marketing \(/about-us/marketing/\)](/about-us/marketing/)



[See more \(/about-us/marketing/\)](/about-us/marketing/)

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destination**research**  
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Commissioned by:

Visit Kent



Economic Impact of Tourism

Thanet - 2017 Results

Produced by:

November 2018

Destination Research  
[www.destinationresearch.co.uk](http://www.destinationresearch.co.uk)



<b>Contents</b>	<b>Page</b>
<b><u>Introduction and Contextual Analysis</u></b>	3
<b><u>Headline Figures</u></b>	6
<b><u>Volume of Tourism</u></b>	8
<b>Staying Visitors in the county context</b>	9
<b>Staying Visitors - Accommodation Type</b>	10
Trips by Accommodation	
Nights by Accommodation	
Spend by Accommodation Type	
<b>Staying Visitors - Purpose of Trip</b>	11
Trips by Purpose	
Nights by Purpose	
Spend by Purpose	
<b>Day Visitors</b>	12
<b>Day Visitors in the county context</b>	12
<b><u>Value of Tourism</u></b>	13
<b>Expenditure Associated With Trips</b>	14
Direct Expenditure Associated with Trips	
Other expenditure associated with tourism activity	
Direct Turnover Derived From Trip Expenditure	
Supplier and Income Induced Turnover	
Total Local Business Turnover Supported by Tourism Activity	
<b><u>Employment</u></b>	16
<b>Direct</b>	17
Full time equivalent	
Estimated actual jobs	
<b>Indirect &amp; Induced Employment</b>	17
Full time equivalent	
Estimated actual jobs	
<b>Total Jobs</b>	18
Full time equivalent	
Estimated actual jobs	
<b>Tourism Jobs as a Percentage of Total Employment</b>	18
<b><u>Appendix I - Cambridge Model - Methodology</u></b>	20

## **Introduction**

This report examines the volume and value of tourism and the impact of visitor expenditure on the local economy in 2017 and provides comparative data against the previously published data for Kent (2015).

Destination Research was commissioned by Visit Kent to produce 2017 results based on the latest data from national tourism surveys and regionally/locally based data. The results are derived using the Cambridge Economic Impact Model.

In its basic form, the model distributes regional activity as measured in national surveys to local areas using 'drivers' such as the accommodation stock and occupancy which influence the distribution of tourism activity at local level. Whenever possible, results have been enhanced by building in additional local-level data gathered by the district (e.g. local attractions data, boat moorings, language schools in the area, accommodation stock, etc.). See Appendix I for further details.

## **Contextual analysis**

### **Domestic tourism**

In 2017, British residents took 100.6 million overnight trips in England, totalling 299 million nights away from home, with an expenditure of £19.05 billion. £189.31 was spent per trip, and with an average trip length of 2.97 nights, the average spend per night was £63.62. The number of domestic trips was 2% up on 2015, and the amount spent was also up by 2%.

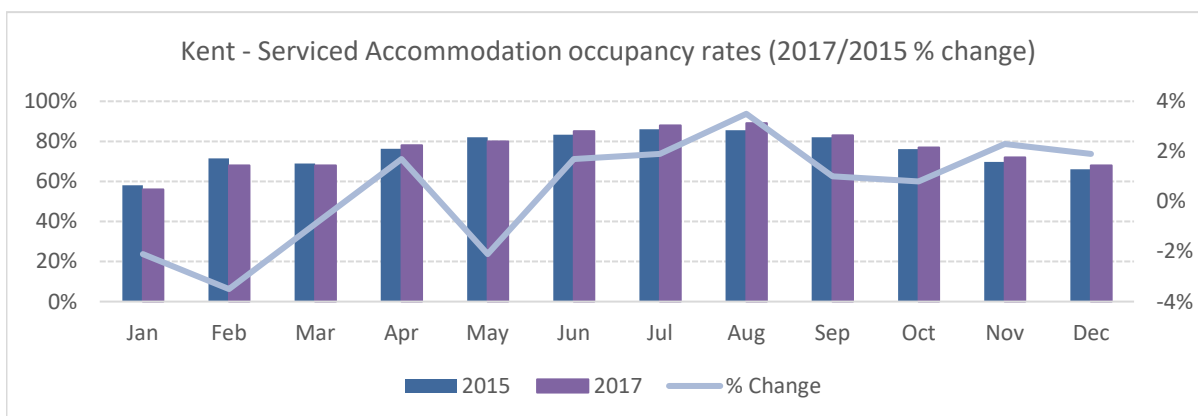
The South East region experienced a 1% increase in overnight trips between 2015 and 2017. Bednights were up 2% on 2015 and expenditure was up by 3%. The region received slightly more visitors in 2017 than in 2015 and visitors spent slightly more per night than in 2015. The average spend per night was up from £56.53 per night in 2015 to £59.01 in 2017.

### **Domestic visits to Kent**

The domestic tourism results for Kent used in this model combine a mixture of supply and demand data. We do this because extracting county level data from national surveys can sometimes lead to inaccurate results due to low sample sizes. According to the GB Tourism Survey (demand side), Kent experienced a 1% decrease in the volume of trips between 2015 and 2017. Nights were down 2% and expenditure was also down by 1%.

In 2017, serviced accommodation providers saw an average occupancy of 76%, compared to the 75.5% witnessed in 2015, an increase of 0.5%. By combining the supply and demand results we estimate that trips to Kent were down by a marginal rate of 0.3%, nights per trip were up by 1.9% and expenditure increased by 2.9%.

*Please note that the Cambridge Model uses three year rolling averages to reduce some of the more extreme fluctuations which are due to small sample sizes and high margins or error.*



### **Visits from overseas**

As with domestic tourism, the Cambridge Model uses three year averages to estimate changes in overseas tourism to reduce some of the more extreme fluctuations which can be attributed to small sample sizes and high margins or error. At national level, the number of visits in 2017 grew by 10% reaching 33 million. The number of visitor nights spent in the UK increased by 7% between 2015 and 2017 to reach 245.7 million, with the average number of nights per visit standing at 7.4.

Overseas trips to the South England region were 9% up on 2015 to reach 5.2 million overnight trips. The total number of nights was up by 8% to reach 37.4 million in 2017. Spend was unchanged from the levels achieved in 2015.

Kent also experienced growth between 2015 and 2017. Trips were up 4%, nights per trip went up 11% and expenditure was also up by 4%.

The International Passenger Survey (IPS) is conducted by Office for National Statistics and is based on face-to-face interviews with a sample of passengers travelling via the principal airports, sea routes and the Channel Tunnel, together with visitors crossing the land border into Northern Ireland. The number of interviews conducted in England in 2017 was around 35,628.

### ***Day visitors***

During 2017, GB residents took a total of 1.5 billion tourism day trip to destinations in England. Around £51 billion was spent during these trips. At national level, the volume of day trips was down by 1% and the expenditure levels were unchanged between 2015 and 2017.

The volume and value of tourism day visits in the South East of England increased by 4% between 2015 and 2017, from 221 million to 230 million. Expenditure levels were up by 5% to £7.4 billion in 2017.

The results for Kent are based on a combination of results from the GB Day Visitor Survey, admissions data from the Visits to Visitor Attractions Survey, the ALVA (Association of Leading Visitor Attractions) Survey and attractions visitor numbers from the Visit Kent Business Barometer.

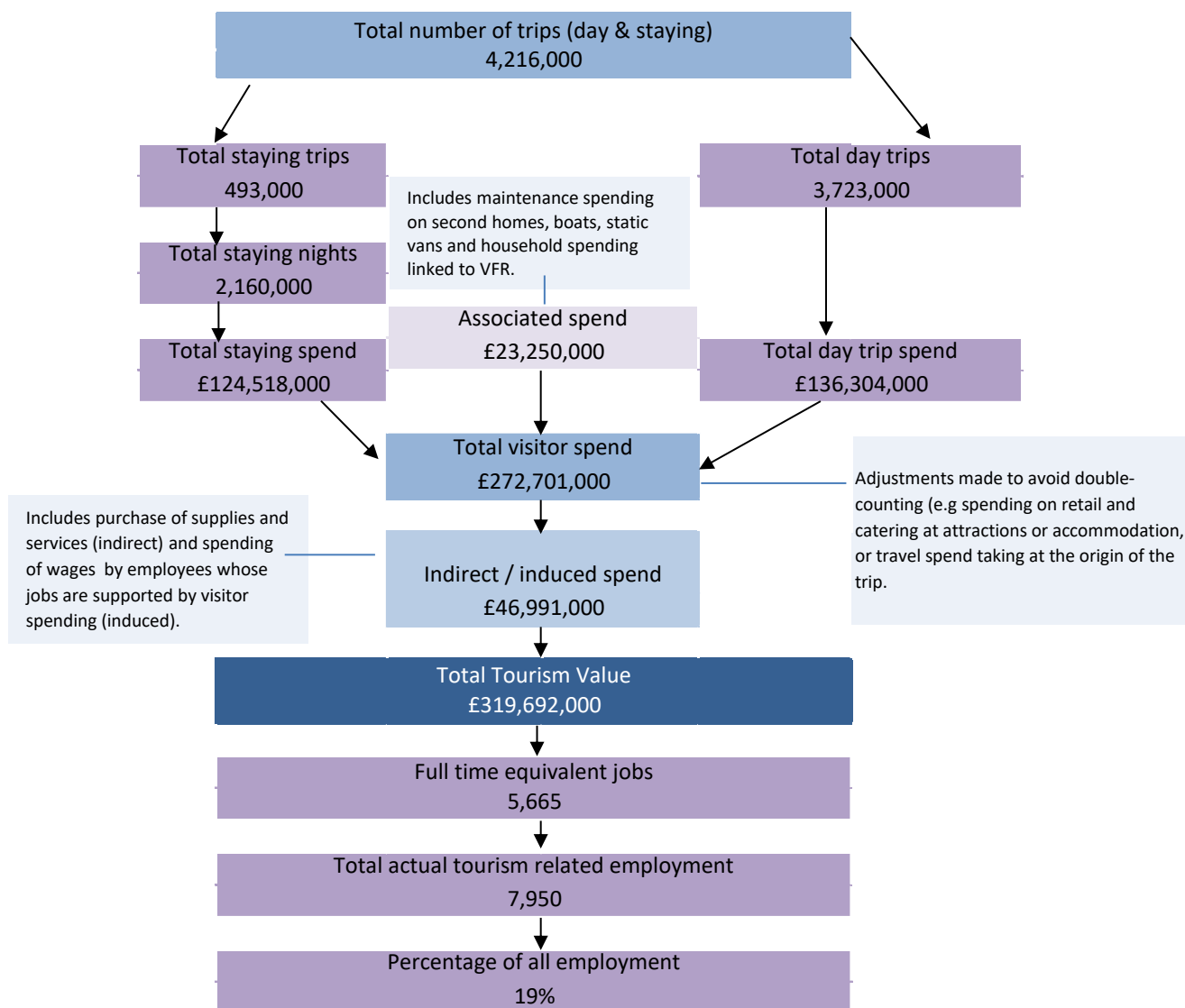
The GB Day Visitor Survey shows a 15% increase in volume of trips to Kent between 2015 and 2017 and a 20% increase in value for the same period. However, data from the Visits to Visitor Attractions Survey looking at attractions based in Kent shows that the admissions to attractions were up by 5% between 2015 and 2017 and admission charges were also up by 5%. Results from the Visit Kent Business Barometer report an increase of 4% in visitor numbers for the same period.

Based on these results the model assumes that the volume of day trips was up 8% between 2015 and 2017 and expenditure up by 9%.



## Economic Impact of Tourism – Headline Figures

## Thanet - 2017 Results



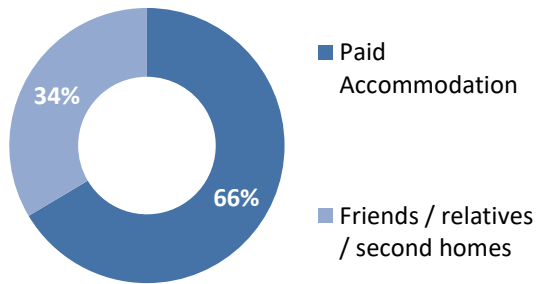
### Economic Impact of Tourism – Year on year comparisons

### Thanet

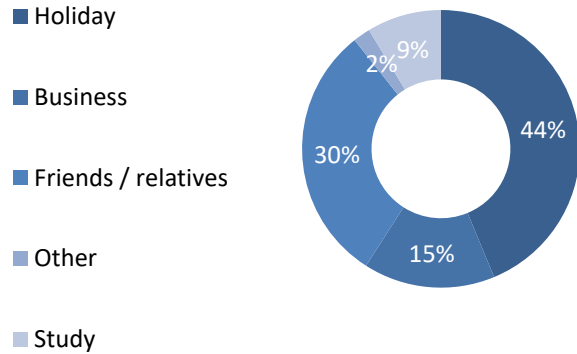
	2015	2017	Annual variation
<b>Day Trips</b>			
Day trips Volume	3,386,900	3,723,000	9.9%
Day trips Value	£119,391,494	£136,304,000	14.2%
<b>Overnight trips</b>			
Number of trips	494,000	493,000	-0.2%
Number of nights	2,059,000	2,160,000	4.9%
Trip value	£122,087,000	£124,518,000	2.0%
<b>Total Value</b>	<b>£292,877,400</b>	<b>£319,692,000</b>	<b>9.2%</b>
<b>Actual Jobs</b>	<b>7,312</b>	<b>7,950</b>	<b>8.7%</b>

Thanet	2015	2017	Variation
Average length stay (nights x trip)	4.17	4.38	5.1%
Spend x overnight trip	£ 247.14	£ 252.57	2.2%
Spend x night	£ 59.29	£ 57.65	-2.8%
Spend x day trip	£ 35.25	£ 36.61	3.9%

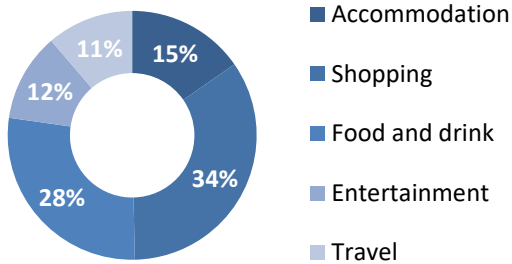
**Trips by type of accommodation**



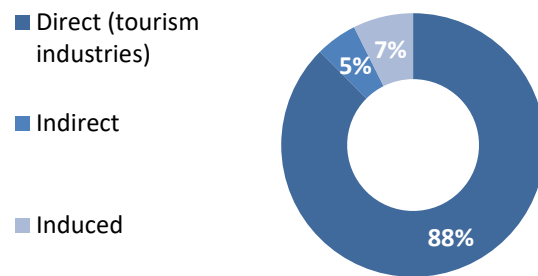
**Trips by Purpose**



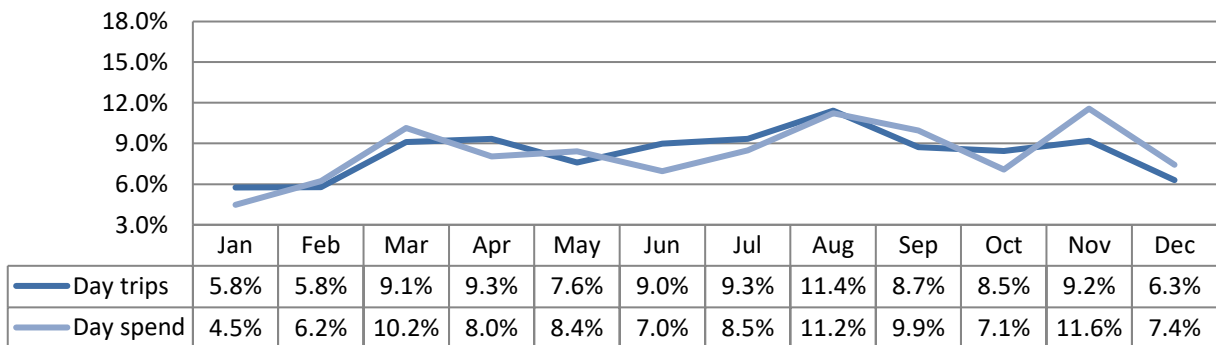
**Breakdown of expenditure**



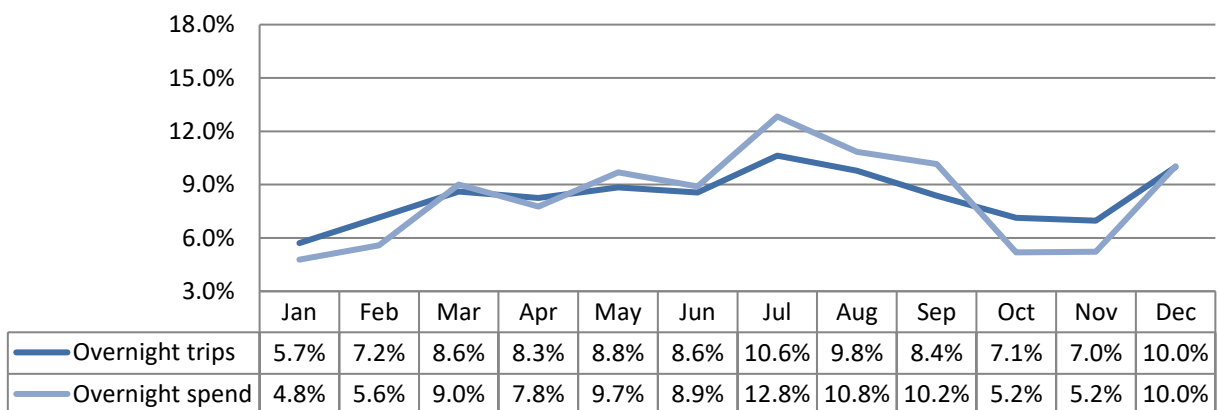
**Type of employment**



**Seasonality - Day visitors (County level)**



**Seasonality - Overnight visitors (County level)**



## Volume of Tourism

## Staying visits in the county context

## Thanet - 2017 Results

Staying trips in the county context	Domestic trips ('000)	Overseas trips ('000)
Ashford	281	110
Canterbury	461	186
Dartford	135	46
Dover	336	86
Gravesham	149	40
Maidstone	288	83
Medway	423	101
Sevenoaks	168	63
Folkestone & Hythe	395	75
Swale	355	43
Thanet	345	148
Tonbridge&Malling	193	49
Tunbridge Wells	246	65
<b>Kent</b>	<b>3,775</b>	<b>1,095</b>

Staying nights in the county context	Domestic nights ('000)	Overseas nights ('000)
Ashford	753	504
Canterbury	1,411	1,322
Dartford	386	239
Dover	952	487
Gravesham	389	243
Maidstone	746	525
Medway	1,251	686
Sevenoaks	434	353
Folkestone & Hythe	991	434
Swale	1,244	324
Thanet	1,040	1,120
Tonbridge&Malling	553	300
Tunbridge Wells	748	446
<b>Kent</b>	<b>10,898</b>	<b>6,983</b>

Expenditure in the county context	Domestic spend (millions)	Overseas spend (millions)
Ashford	£44	£29
Canterbury	£76	£73
Dartford	£19	£12
Dover	£63	£26
Gravesham	£16	£10
Maidstone	£38	£28
Medway	£60	£30
Sevenoaks	£23	£18
Folkestone & Hythe	£62	£20
Swale	£45	£12
Thanet	£54	£70
Tonbridge&Malling	£26	£13
Tunbridge Wells	£41	£21
<b>Kent</b>	<b>£568</b>	<b>£361</b>



## Staying Visitors - Accommodation Type

## Thanet - 2017 Results

### Trips by Accommodation

	UK		Overseas		Total	
Serviced	132,000	38%	73,000	50%	205,000	42%
Self catering	16,000	5%	11,000	7%	27,000	5%
Camping	23,000	7%	5,000	4%	28,000	6%
Static caravans	35,000	10%	0	0%	35,000	7%
Group/campus	2,000	1%	9,000	6%	11,000	2%
Paying guest	0	0%	0	0%	0	0%
Second homes	8,000	2%	1,000	1%	9,000	2%
Boat moorings	6,000	2%	0	0%	6,000	1%
Other	3,000	1%	12,000	8%	15,000	3%
Friends & relatives	120,000	34%	36,000	24%	156,000	32%
<b>Total 2017</b>	<b>345,000</b>		<b>148,000</b>		<b>493,000</b>	
Comparison 2015	351,000		143,000		494,000	
Difference	-2%		3%		0%	

### Nights by Accommodation

	UK		Overseas		Total	
Serviced	302,000	29%	328,000	29%	630,000	29%
Self catering	85,000	8%	86,000	8%	171,000	8%
Camping	86,000	8%	44,000	4%	130,000	6%
Static caravans	156,000	15%	0	0%	156,000	7%
Group/campus	8,000	1%	84,000	8%	92,000	4%
Paying guest	0	0%	0	0%	0	0%
Second homes	27,000	3%	2,000	0%	29,000	1%
Boat moorings	28,000	3%	0	0%	28,000	1%
Other	9,000	1%	37,000	3%	46,000	2%
Friends & relatives	339,000	33%	539,000	48%	878,000	42%
<b>Total 2017</b>	<b>1,040,000</b>		<b>1,120,000</b>		<b>2,160,000</b>	
Comparison 2015	993,000		1,066,000		2,059,000	
Difference	5%		5%		5%	

### Spend by Accommodation Type

	UK		Overseas		Total	
Serviced	£31,328,000	58%	£39,229,000	56%	£70,557,000	57%
Self catering	£4,356,000	8%	£3,563,000	5%	£7,919,000	6%
Camping	£2,191,000	4%	£1,947,000	3%	£4,138,000	3%
Static caravans	£4,097,000	8%	£0	0%	£4,097,000	3%
Group/campus	£82,000	0%	£5,012,000	7%	£5,094,000	4%
Paying guest	£0	0%	£0	0%	£0	0%
Second homes	£483,000	1%	£98,000	0%	£581,000	0%
Boat moorings	£500,000	1%	£0	0%	£500,000	0%
Other	£497,000	1%	£749,000	1%	£1,246,000	1%
Friends & relatives	£10,588,000	19%	£19,798,000	28%	£30,386,000	25%
<b>Total 2017</b>	<b>£54,122,000</b>		<b>£70,396,000</b>		<b>£124,518,000</b>	
Comparison 2015	£54,237,000		£67,850,000		£122,087,000	
Difference	0%		4%		2%	

Serviced accommodation includes hotels, guesthouses, inns, B&B and serviced farmhouse accommodation. Paying guest refers to overseas visitors staying in private houses, primarily language school students. Other trips includes nights spent in transit, in lorry cabs and other temporary accommodation.

## Staying Visitors - Purpose of Trip

## Thanet - 2017 Results

### Trips by Purpose

	UK		Overseas		Total	
Holiday	167,000	48%	47,000	32%	214,000	44%
Business	48,000	14%	28,000	18%	76,000	15%
Friends & relatives	124,000	36%	26,000	18%	150,000	30%
Other	6,000	2%	4,000	3%	10,000	2%
Study	0	0%	43,000	29%	43,000	9%
<b>Total 2017</b>	<b>345,000</b>		<b>148,000</b>		<b>493,000</b>	
Comparison 2015	351,000		143,000		494,000	
Difference	-2%		3%		0%	

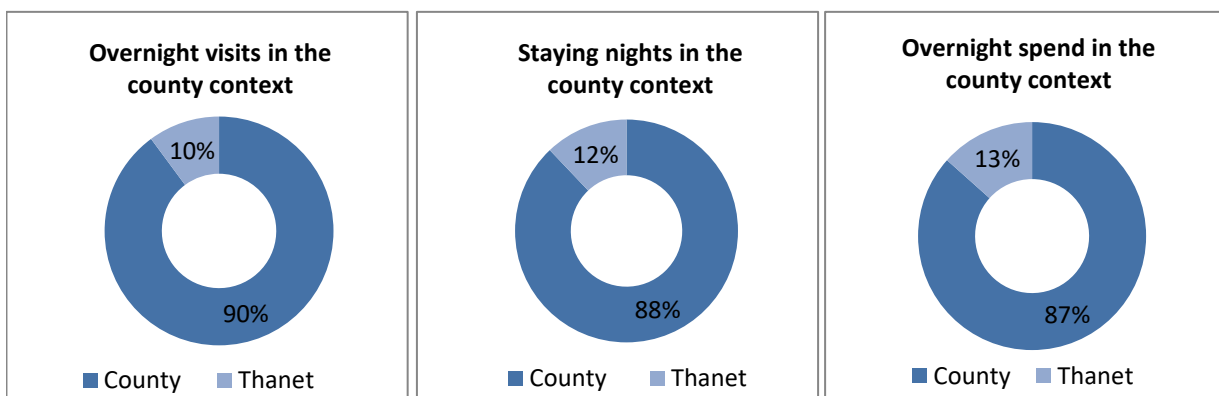
### Nights by Purpose

	UK		Overseas		Total	
Holiday	601,000	58%	244,000	22%	845,000	39%
Business	164,000	16%	72,000	6%	236,000	11%
Friends & relatives	258,000	25%	226,000	20%	484,000	23%
Other	17,000	2%	27,000	2%	44,000	2%
Study	0	0%	551,000	49%	551,000	26%
<b>Total 2017</b>	<b>1,040,000</b>		<b>1,120,000</b>		<b>2,160,000</b>	
Comparison 2015	993,000		1,066,000		2,059,000	
Difference	5%		5%		5%	

### Spend by Purpose

	UK		Overseas		Total	
Holiday	£28,143,000	52%	£17,211,000	25%	£45,354,000	36%
Business	£16,237,000	30%	£5,040,000	7%	£21,277,000	17%
Friends & relatives	£9,201,000	17%	£6,953,000	10%	£16,154,000	13%
Other	£541,000	1%	£2,265,000	3%	£2,806,000	2%
Study	£0	0%	£38,927,000	55%	£38,927,000	31%
<b>Total 2017</b>	<b>£54,122,000</b>		<b>£70,396,000</b>		<b>£124,518,000</b>	
Comparison 2015	£54,237,000		£67,850,000		£122,087,000	
Difference	0%		4%		2%	

### Proportion of staying visits in the county context

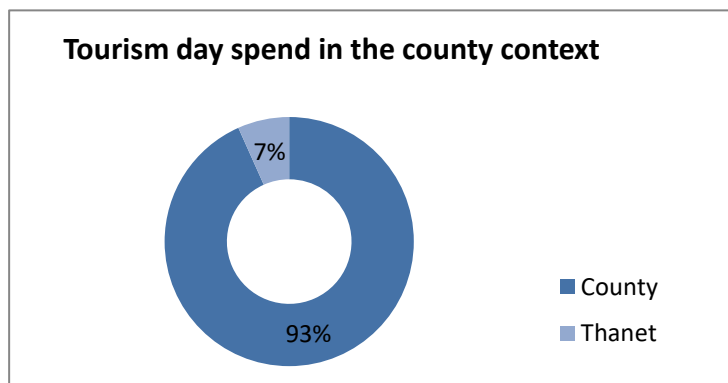
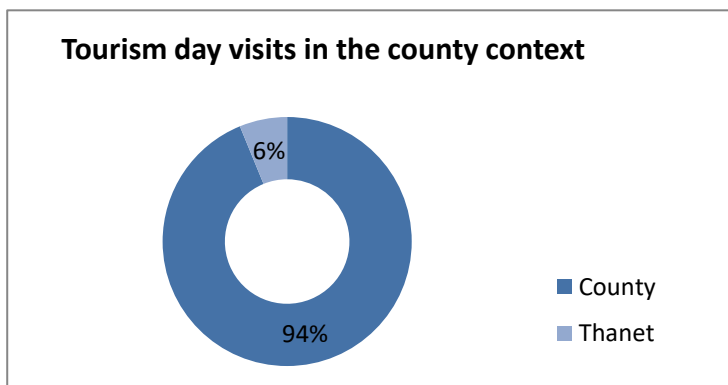


**Total Volume and Value of Day Trips**

		<b>Trips</b>	<b>Spend</b>
<b>Total</b>	<b>2017</b>	<b>3,723,000</b>	<b>£136,304,000</b>
<b>Comparison</b>	<b>2015</b>	<b>3,386,900</b>	<b>£119,391,494</b>
<b>Difference</b>		<b>10%</b>	<b>14%</b>

**Day Visitors in the county context**

<b>District</b>	<b>Day Visits (millions)</b>	<b>Day Visit Spend (millions)</b>
Ashford	4.0	£141.4
Canterbury	7.1	£238.1
Dartford	10.6	£404.7
Dover	4.2	£127.0
Gravesham	1.8	£52.6
Maidstone	4.1	£135.7
Medway	4.4	£144.5
Sevenoaks	4.0	£140.4
Folkestone & Hythe	4.3	£127.7
Swale	4.7	£141.4
<b>Thanet</b>	<b>3.7</b>	<b>£136.3</b>
Tonbridge&Malling	2.8	£89.6
Tunbridge Wells	4.3	£157.4
<b>Kent</b>	<b>60.1</b>	<b>£2,036.7</b>



## Value of Tourism



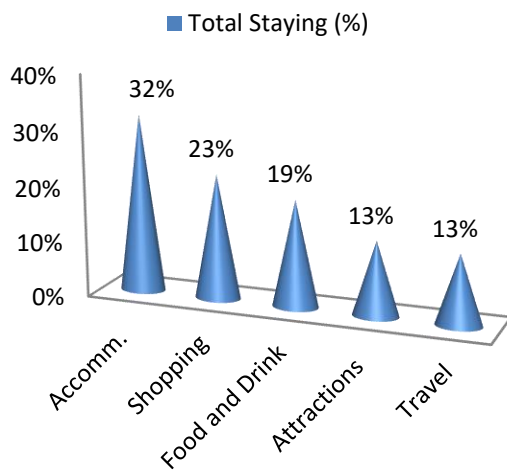
## Expenditure Associated with Trips

## Thanet - 2017 Results

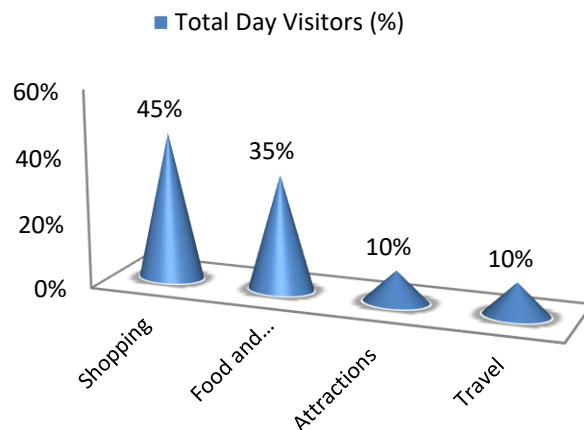
### Direct Expenditure Associated with Trips

	Accomm.	Shopping	Food and Drink	Attractions	Travel	Total
UK Tourists	£19,829,000	£6,641,000	£11,715,000	£5,464,000	£10,473,000	£54,122,000
Overseas tourists	£20,192,000	£21,381,000	£12,294,000	£11,257,000	£5,271,000	£70,396,000
<b>Total Staying</b>	<b>£40,021,000</b>	<b>£28,022,000</b>	<b>£24,009,000</b>	<b>£16,721,000</b>	<b>£15,744,000</b>	<b>£124,518,000</b>
<b>Total Staying (%)</b>	<b>32%</b>	<b>23%</b>	<b>19%</b>	<b>13%</b>	<b>13%</b>	<b>100%</b>
<b>Total Day Visitors</b>	<b>£0</b>	<b>£61,473,000</b>	<b>£47,979,000</b>	<b>£13,221,000</b>	<b>£13,640,000</b>	<b>£136,304,000</b>
<b>Total Day Visitors (%)</b>	<b>0%</b>	<b>45%</b>	<b>35%</b>	<b>10%</b>	<b>10%</b>	<b>100%</b>
<b>Total 2017</b>	<b>£40,021,000</b>	<b>£89,495,000</b>	<b>£71,988,000</b>	<b>£29,942,000</b>	<b>£29,384,000</b>	<b>£260,831,000</b>
<b>%</b>	<b>15%</b>	<b>34%</b>	<b>28%</b>	<b>11%</b>	<b>11%</b>	<b>100%</b>
Comparison 2015	£39,622,000	£81,071,000	£65,272,000	£28,160,000	£27,353,000	£241,478,000
Difference	1%	10%	10%	6%	7%	8%

### Breakdown of expenditure



### Breakdown of expenditure



### Other expenditure associated with tourism activity

Other expenditure associated with tourism activity - Estimated spend				
Second homes	Boats	Static vans	Friends & relatives	Total
£912,000	£1,200,000	£210,000	£20,928,000	£23,250,000

Spend on second homes is assumed to be an average of £2,000 on rates, maintenance, and replacement of furniture and fittings. Spend on boats assumed to be an average of £2,000 on berthing charges, servicing and maintenance and upgrading of equipment. Static van spend arises in the case of vans purchased by the owner and used as a second home. Expenditure is incurred in site fees, utility charges and other spending and is estimated at £2,000. Additional spending is incurred by friends and relatives as a result of people coming to stay with them. A cost of £175 per visit has been assumed based on national research for social and personal visits.

## Direct Turnover Derived From Trip

## Thanet - 2017 Results

Business turnover arises as a result of tourist spending, from the purchase of supplies and services locally by businesses in receipt of visitor spending and as a result of the spending of wages in businesses by employees whose jobs are directly or indirectly supported by tourism spending.

		<b>Staying Visitor</b>	<b>Day Visitors</b>	<b>Total</b>
Accommodation		£40,636,000	£960,000	£41,596,000
Retail		£27,801,000	£60,858,000	£88,659,000
Catering		£23,359,000	£46,540,000	£69,899,000
Attractions		£17,313,000	£14,316,000	£31,629,000
Transport		£9,490,000	£8,178,000	£17,668,000
Non-trip spend		£23,250,000	£0	£23,250,000
<b>Total Direct</b>	<b>2017</b>	<b>£141,849,000</b>	<b>£130,852,000</b>	<b>£272,701,000</b>
Comparison	2015	£135,189,000	£114,616,000	£249,805,400
Difference		5%	14%	9%

Adjustments have been made to recognise that some spending on retail and food and drink will fall within attractions or accommodation establishments. It is assumed that 40% of travel spend will take place at the origin of the trip rather than at the destination.

## Supplier and Income Induced Turnover

		<b>Staying Visitor</b>	<b>Day Visitors</b>	<b>Total</b>
Indirect spend		£8,590,000	£7,102,000	£15,692,000
Non trip spending		£3,488,000	£0	£3,488,000
Income induced		£15,415,000	£12,396,000	£27,811,000
<b>Total</b>	<b>2017</b>	<b>£27,493,000</b>	<b>£19,498,000</b>	<b>£46,991,000</b>
Comparison	2015	£25,993,000	£17,079,000	£43,072,000
Difference		6%	14%	9%

Income induced spending arises from expenditure by employees whose jobs are supported by tourism spend.

## Total Local Business Turnover Supported by Tourism Activity – Value of Tourism

		<b>Staying Visitor</b>	<b>Day Visitors</b>	<b>Total</b>
Direct		£141,849,000	£130,852,000	£272,701,000
Indirect		£27,493,000	£19,498,000	£46,991,000
<b>Total Value</b>	<b>2017</b>	<b>£169,342,000</b>	<b>£150,350,000</b>	<b>£319,692,000</b>
Comparison	2015	£161,182,400	£131,695,000	£292,877,400
Difference		5%	14%	9%

## Employment

## Employment

## Thanet - 2017 Results

The model generates estimates of full time equivalent jobs based on visitor spending. The total number of 'actual' jobs will be higher when part time and seasonal working is taken into account. Conversion of full time equivalent jobs into actual jobs relies on information from business surveys in the sectors receiving visitor spending. A new Full Time Equivalent tourism job is created with every £54,000 increase in tourism revenue.

### Direct employment

Full time equivalent (FTE)						
	Staying Visitor		Day Visitor		Total	
Accommodation	949	36%	22	1%	972	20%
Retailing	367	14%	804	37%	1,171	25%
Catering	517	20%	1,031	48%	1,548	32%
Entertainment	256	10%	212	10%	468	10%
Transport	110	4%	95	4%	205	4%
Non-trip spend	431	16%	0	0%	431	9%
<b>Total FTE</b>	<b>2017</b>	<b>2,631</b>		<b>2,164</b>		<b>4,795</b>
Comparison	2015	2,509		1,895		4,405
Difference		5%		14%		9%
Estimated actual jobs						
	Staying Visitor		Day Visitor		Total	
Accommodation	1,405	37%	33	1%	1,438	21%
Retailing	551	15%	1,206	38%	1,757	25%
Catering	776	21%	1,546	48%	2,322	33%
Entertainment	361	10%	299	9%	660	9%
Transport	155	4%	134	4%	289	4%
Non-trip spend	491	13%	0	0%	491	7%
<b>Total Actual</b>	<b>2017</b>	<b>3,740</b>		<b>3,218</b>		<b>6,957</b>
Comparison	2015	3,584		2,819		6,403
Difference		4%		14%		9%

### Indirect & Induced Employment

Full time equivalent (FTE)						
	Staying Visitor		Day Visitors		Total	
Indirect jobs		224		132		355
Induced jobs		285		230		515
<b>Total FTE</b>	<b>2017</b>	<b>509</b>		<b>361</b>		<b>870</b>
Comparison	2015	481		316		798
Difference		6%		14%		9%

Estimated actual jobs						
	Staying Visitor		Day Visitors		Total	
Indirect jobs		255		150		405
Induced jobs		325		262		587
<b>Total Actual</b>	<b>2017</b>	<b>580</b>		<b>412</b>		<b>992</b>
Comparison	2015	549		361		909
Difference		6%		14%		9%



## Total Tourism Jobs

## Thanet - 2017 Results

Actual jobs are estimated from surveys of relevant businesses at locations in England and take account of part time and seasonal working.

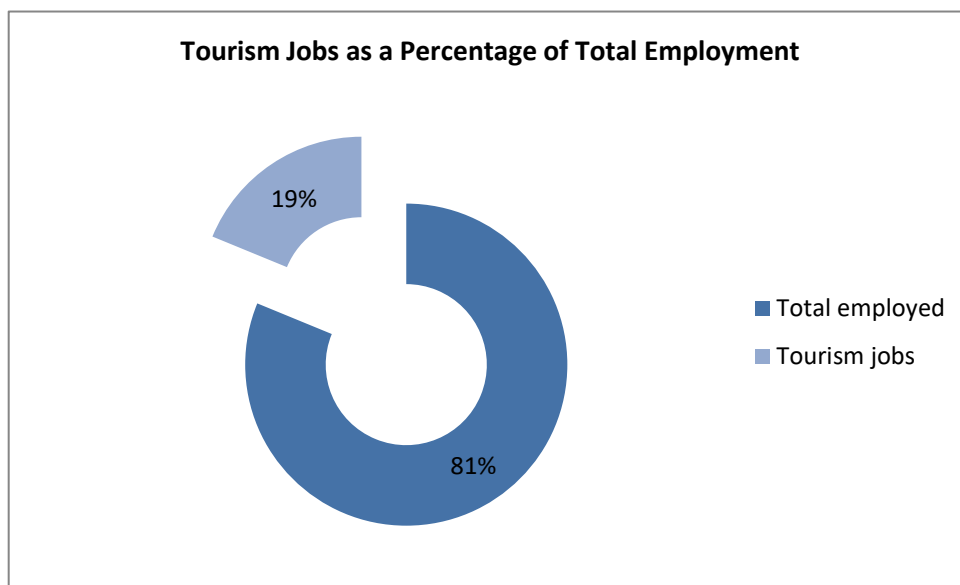
Full time equivalent (FTE)						
	Staying Visitor		Day Visitor		Total	
Direct	2,631	84%	2,164	86%	4,795	85%
Indirect	224	7%	132	5%	355	6%
Induced	285	9%	230	9%	515	9%
<b>Total FTE 2017</b>	<b>3,140</b>		<b>2,525</b>		<b>5,665</b>	
Comparison 2015	2,990		2,212		5,202	
Difference	5%		14%		9%	

Estimated actual jobs						
	Staying Visitor		Day Visitor		Total	
Direct	3,740	87%	3,218	89%	6,957	88%
Indirect	255	6%	150	4%	405	5%
Induced	325	7%	262	7%	587	7%
<b>Total Actual 2017</b>	<b>4,320</b>		<b>3,630</b>		<b>7,950</b>	
Comparison 2015	4,133		3,179		7,312	
Difference	5%		14%		9%	

### Tourism Jobs as a Percentage of Total Employment

	Staying Visitor	Day visitors	Total
Total employed	42,300	42,300	42,300
Tourism jobs	4,320	3,630	7,950
<b>Proportion all jobs</b>	<b>10%</b>	<b>9%</b>	<b>19%</b>
Comparison 2015	4,133	3,179	7,312
Difference	5%	14%	9%



**The key 2017 results of the Economic Impact Assessment are:**

**4.2 million trips** were undertaken in the area  
**3.7 million** day trips  
**0.5 million** overnight visits

**2.2 million** nights in the area as a result of overnight trips

**£273 million** spent by tourists during their visit to the area  
**£23 million** spent on average in the local economy each month.

**£125 million** generated by overnight visits  
**£136 million** generated from day trips.

**£320 million** spent in the local area as result of tourism, taking into account multiplier effects.

**7,950 jobs** supported, both for local residents from those living nearby.  
**6,957 tourism jobs** directly supported  
**992 non-tourism related jobs** supported linked to multiplier spend from tourism.

## **Appendix I - Introduction about Cambridge Model**

This report examines the volume and value of tourism and the impact of that expenditure on the local economy. The figures were derived using the Cambridge Economic Impact Model and the research was undertaken by Destination Research.

The model utilises information from national tourism surveys and regionally based data held by Destination Research. It distributes regional activity as measured in those surveys to local areas using 'drivers' such as the accommodation stock and occupancy which influence the distribution of tourism activity at local level.

### **Limitations of the Model**

The methodology and accuracy of the above sources vary. The results of the model should therefore be regarded as estimates which are indicative of the scale and importance of visitor activity in the local area. It is important to note that in the national tourism surveys the sample sizes for each area changes year on year. This is as a result of the random probability nature of the methodology. As such, the results of the Cambridge Model are best viewed as a snapshot in time and we would caution against year-on-year comparisons.

It should be noted that the model cannot take into account any leakage of expenditure from tourists taking day trips out of the area in which they are staying. While it is assumed that these may broadly balance each other in many areas, in locations receiving significant numbers of day visitors from London, there is likely to be an underestimate in relation to the number of overseas day visitors staying in holiday accommodation in London.

Whilst it is important to be aware of these issues, we are confident that the estimates we have produced are as reliable as is practically possible within the constraints of the information available.

### **Rounding**

All figures used in this report have been rounded. Therefore, in some tables there may be a slight discrepancy between totals and sub totals.

### **Data sources**

The main national surveys used as data sources in stage one include:

- Great Britain Tourism Survey (GBTS) - information on tourism activity by GB residents;
- International Passenger Survey (IPS) information on overseas visitors to the United Kingdom;
- Day Visits in the annual Great Britain Day Visitor Survey using information on visits lasting more than 3 hours and taken on an irregular basis

These surveys provide information down to a regional level. In order to disaggregate data to a local level the following information sources are used:

- Records of known local accommodation stock held by Destination Research;
- VisitEngland's surveys of Visits to Attractions, which provide data on the number of visitors to individual tourist attractions ;
- Mid- 2017 estimates of resident population as based on the 2011 Census of Population;
- Selected data from the 2011 Census of Employment;
- Selected data on the countryside and coast including, national designations and length of the coastline.

### **Staying Visitors**

The GBTS provides information on the total number of trips to the region and the relative proportions using different types of accommodation. By matching these figures to the supply of such accommodation, the regional average number of trips per bedspace or unit of accommodation can be derived. The IPS provides information on the total number of trips by overseas visitors to the region. The model uses three year rolling averages to reduce extreme highs and lows which are due to small sample sizes, rather than being a reflection on drastic changes in demand year-on-year.

### **Day Visitors**

Information on day trips at the regional level is available from the Day Visits in Great Britain survey. The survey includes all leisure-related trips from home. It should be noted that a large proportion are local trips made by people resident in the locality. The model uses information from the survey to estimate the number of longer day trips (defined as those lasting at least 3 hours and involving travel of more than 20 miles) and irregular trips lasting more than 3 hours.

### **Impact of tourism expenditure**

This section examines the impact of the tourism expenditure in terms of the direct, indirect and induced expenditure as well as an estimate of the actual jobs (both direct and indirect) supported by tourism expenditure in the district.

The GBTS, IPS and Day Visits to Great Britain survey data on the breakdown of visitor spending. The impact of this initial round of expenditure will be subsequently increased by multiplier effects. These arise from the purchase of supplies and services by the businesses in receipt of visitor expenditure (indirect impacts), and by the income induced-effects arising from the spending of wages by employees in the first round of business and in subsequent expenditure in supplier business (induced impacts).

The New Earnings Survey which provides information on wage levels by industry sector and region; An internal business database which includes data on the structure of business expenditure, local linkages and multiplier ratios drawn from a wide range of business and economic studies carried out by Geoff Broom Associates, PA Cambridge Economic Consultants and others. By applying the breakdown to the estimates of visitor spending, the model generates estimates of total direct spending.

Evidence from national studies suggests that some minor adjustments are required to match visitor spend to business turnover – for example, some expenditure on food and drink actually takes place in inns and hotels that fall in the accommodation sector and within attractions. More significantly, expenditure on travel costs associated with individual trips is equally likely to take place at the origin of the trip as the destination. Therefore the model assumes that only 40% of travel expenditure accrues to the destination area.

### **Number of full time job equivalents**

Having identified the value of turnover generated by visitor spending, it is possible to estimate the employment associated with that spending. Wages for staff and drawings for the proprietors will absorb a proportion of that turnover. By applying these proportions to the overall additional turnover in each sector, the amount of money absorbed by employment costs can be calculated. The New Earnings Survey provides data from which the average costs by business sector, adjusted to take account of regional differences, can be calculated.



After allowing for additional costs such as National Insurance and pension costs, an average employment cost per full time equivalent job can be estimated. The number of such jobs in the local area can then be estimated by dividing the amount of business expenditure on wages and drawings by the average employment cost per job.

### **Number of Actual Jobs**

The model generates estimates of full time equivalent jobs based on visitor spending. However, the total number of actual jobs will be higher when part time and seasonal working is taken into account. The full time equivalent jobs arising directly from visitor spending are converted into actual jobs using information from business surveys in the sectors receiving visitor spending (principally accommodation, food and drink, retail, attractions, transport). In general, the conversion factor between full time equivalent jobs and actual jobs varies around 1.5 in those sectors.

The indirect and induced jobs arise across a much wider range of employment sectors. Therefore, the average 1.16 for all sectors based on Census of Employment data has been used to convert full time equivalent jobs in this sector to actual jobs.

The employment estimates generated by the model include both self-employed and employed people supported by visitor expenditure. The model also includes an estimate of the additional jobs arising in the attractions sector, which are not related to visitor expenditure. However, the numbers do not include other tourism-related employment such as jobs in local authorities arising from their tourism functions, e.g. tourist information staff, additional public health, parks and gardens, public conveniences, maintenance sections and jobs arising from capital investment in tourism facilities.

### **Local level data for Kent EIA Reports 2017**

The Cambridge Model allows for the use of local visitor related data. Local data from visitor survey and other sources is not always sufficiently detailed or available regularly enough to make the results consistent. We rely on partners to collect additional locally source data to feed into the model. We have also used data from Visit Kent's Business Barometer. The following local data has been included in the 2017 Kent results:

**Dartford - Bluewater Shopping Centre** - Bluewater attracted 28 million visitors in 2017. Only about a quarter of these visits is accounted for in the Cambridge Model, equating to about 7.8 million visits.

**Dover District** - Cruise Passengers data - Port of Dover received about 225,000 cruise passengers in 2017. Official statistics (DfT) suggest that about half of all passengers to Dover would be 'port calls' visits. Furthermore, cruise passengers are included at both departure and arrival if their journey begins and ends at a UK seaport. We made the following assumptions:

A total of 112,000 cruise passengers were classed as 'port call' visits and have been counted as day visitors. For the additional estimated 112,000 that departed or finished their trip in Dover we assume that most would start and finish their trip at Dover. A multiplier factor of 0.6 has been applied to avoid double counting and the additional trips have been added as extra serviced accommodation trips (67,500).

**Tonbridge & Malling** - Tonbridge Castle visitor numbers have rebounded recently, following a drop in performance between 2014-2016. The latest admission figures have been included in the district results.

Other anecdotal information taken into consideration was the significant growth in high-end independent cafes and restaurants in Tonbridge since 2016, now making it quite a foody destination (includes Tonbridge Old Fire Station, Beyond the Grounds, Basil, Havet, Saltwaters, Verdigris, Fuggles and Paws Cat Café). Outside of Tonbridge, Aylesford Priory attracts hundreds of thousands of visitors each year. The latest admission figures have been included in the district results.

#### **Folkestone & Hythe District Council (previously Shepway District)**

The latest admission figures for Romney Marsh Visitor Centre have been included in the district results. Folkestone Triennial 2017 - During September and October 2017 the Triennial attracted record high visitor numbers . The latest admission figures have been included in the district results.

#### **Ashford**

Annual footfall figures for the Big Cat Sanctuary in Smarden have been included.  
Car park data shows that Ashford carparks saw a 2% drop in users and Tenterden a 1% drop.

#### **Medway**

Increase in the number of festivals and events (Sweeps Festival, Dickens Summer Festival, Rochester Castle concerts, Medieval Merriment, Dickensian Christmas Festival, 'The Battle of Medway' (two weeks in June 2017) with additional 200 Dutch yachts and many visitors to the two week series of events. Coach visits (2017) 22,047 coaches and assumed 114,608 visitors (assumes x54 pax per coach).

#### **Swale**

We have used selected information from the Destination Intelligence reports submitted as part of their British Destination membership and the data sharing and benchmarking research.

#### **Thanet**

Thanet Language Schools – Figures for 2017 compared to 2015 show an 11% increase in volume. Southeastern - Comparison stats for 2015 and 2017 - For travel to Margate, Broadstairs and Ramsgate only, journeys on Off-Peak products increased by 33% from April 2016 to March 2017 compared to the previous year.

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