

MANSTON AIRPORT DEVELOPMENT CONSENT ORDER EXAMINATION
SUBMISSION TO DEADLINE 11:
Comments on Information requested by the ExA and received from the
Applicant to Deadline 10

THANET DISTRICT COUNCIL LOCAL IMPACT REPORT
Additional Evidence- Impact definition Local Labour

1. The Applicant at Page 34 of the Updated Register of Environmental Actions (REAC) [[REP8-018](#)] has at Deadline 8 defined “*local labour*” as “*those living within a 90-minute commute of Manston Airport*” at Footnote 15 (underlined for emphasis).
2. According to the Strategic Commissioning - Analytics of Kent County Council department:
“Footnote 15: Refers to “Local Labour” which they define as anyone of working age who lives within a 90 minute commuting distance from the site. So this will include more than just the residents of working age from Thanet.
For example it is feasible for people living in west Kent and outer London to commute to work at the site within 90 minutes¹” (underlined for emphasis).
3. We respectfully submit this would have a material and significant impact on all comments provided by Thanet District Council because in its comments Thanet District Council has made the assumption that ‘local’ means Thanet not those living within a 90-minute commute of Manston Airport.
4. We respectfully draw the Examining Authority’s attention to our evidenced submission [[REP9-XXX](#)]² attached for ease of reference.

¹ Email received from Strategic Commissioning - Analytics of Kent County Council department 2 July 2019 (attached)

5. We again respectfully strongly state that the Applicant cannot claim a “*Local: major beneficial significance*” when the Applicant’s population reach of Local fits within the population reach of *beyond* Regional in relation to the impact Socio-Economic and the Mitigation Proposed at Page 34 of the Updated Register of Environmental Actions (REAC)[[REP8-018](#)] these being:
- (1) Generation of employment opportunities in the construction sector and within airport related industries; and
 - (2) Reduction in levels on unemployment within the local area (i.e. Thanet)
6. **We robustly recommend the Examining Authority recommends that the Applicant’s proposed Scheme for Socio-Economic Measures to be incorporated during the Construction Phase** *Generation of employment opportunities in the construction sector and within airport related industries; and Reduction in levels on unemployment within the local area (i.e. Thanet)* **would be of:**
- (1) Local: negligible significance**
 - (2) Regional: negligible significance.
7. We again respectfully strongly state that it is unclear how the Applicant can claim a “*Local: major beneficial significance*” but of “*Regional negligible/minor significance*” when the Applicant’s population reach of Local fits within the population reach of *beyond* Regional in relation to the impact Socio-Economic and the Mitigation Proposed at Page 70/80 of the Updated Register of Environmental Actions (REAC)[[REP8-018](#)] being:
- (1) Reduction in levels on unemployment within the local area
8. We respectfully draw the Examining Authority’s attention to the fact that ‘local area’ is not defined or quantified in any way.

9. **We robustly recommend the Examining Authority recommends that the Applicant's proposed Scheme for Socio-Economic Measures Operational *Reduction in levels on unemployment within the local area* would be of:**
- (1) Local: negligible significance**
 - (2) Regional: negligible significance.**
10. **Further, we question whether the Examining Authority can give any comfort to the Secretary of State that such benefits are secured, and the level of confidence in their delivery.**

Appendix



Query

research@kent.gov.uk <research@kent.gov.uk>

Tue, Jul 2, 2019 at 2:10 PM

To: 

Hi Samara,

Footnote15 The Applicant would define local labour as those living within a 90-minute commute of Manston Airport, this is based on research by the Impact Assessment Unit at Oxford Brookes University which defined home-based workers as living within a 90-minute commute zone

Refers to "Local Labour" which they define as anyone of working age who lives within a 90 minute commuting distance from the site. So this will include more than just the residents of working age from Thanet.

For example it is feasible for people living in west Kent and outer London to commute to work at the site within 90 minutes.

Does this make sense?

To look into how the 90 minute commute distance has been arrived, you would need to contact the Impact assessment unit at Oxford Brookes University.

I hope that this helps.

Best regards



**MANSTON AIRPORT DEVELOPMENT CONSENT ORDER EXAMINATION
SUBMISSION TO DEADLINE 10:**

**Comments on Information requested by the ExA and received from the
Applicant to Deadline 9**

and

Thanet District Council Local Impact Report [REP3-010]

and

Updated Register of Environmental Actions (REAC) [REP8-018]

EMPLOYMENT

1. We respectfully point out that in the Applicants' answer at S.E.3.1 [REP7a-002] in its response to a question from the Examining Authority about "jobs to be filled by people from the local area", the Applicant has answered using the term "local labour".
2. The Applicant at Page 33 of the Updated Register of Environmental Actions (REAC) [REP8-018] has at Deadline 8 defined "local labour" as "those living within a 90-minute commute of Manston Airport" (underlined for emphasis).
3. **We respectfully submit this would have a material and significant impact on all comments provided by Thanet District Council because in its comments Thanet District Council has made the assumption that 'local' means Thanet not those living within a 90-minute commute of Manston Airport.**
4. For example Thanet District Council's comment on the Applicant's answer to question SE.2.6 at [REP7a-045] it comments that:

"However, the ES does not consider the impact of the job creation against the total number of jobs/employment in Thanet. Therefore, the creation of 71.1% of jobs at year 20 only equates to the creation of 8.3% jobs overall at the local level of Thanet. Whilst the impact on

the jobs created within the airport industry sectors should be considered, it should be considered against the total number of jobs at the local level: Thanet. Given the context of Thanet, an increase in jobs by 8.3% would still be considered of beneficial significance but it remains to be confirmed whether this would be of a minor, moderate or major beneficial significance” (underlined for emphasis).

5. We respectfully draw the Examining Authority’s attention to Paragraphs 4.2.20-4.2.23 of [REP3-010] in which Thanet District Council had previously raised concerns in its Local Impact Report stating:

“This suggests that over two thirds of residents across Kent, Kent and Medway and Thanet only travel up to 20km to work” (underlined for emphasis).

“Therefore, the inclusion of distances up to 40km would appear to skew the data and exaggerate the economic impacts. The 40km benchmark implies that almost half of Kent would be affected by Manston Airport given that Tunbridge Wells, Tonbridge, Sevenoaks, Dartford, Maidstone and the Medway Towns are all within 80km of Manston Airport” (underlined for emphasis).

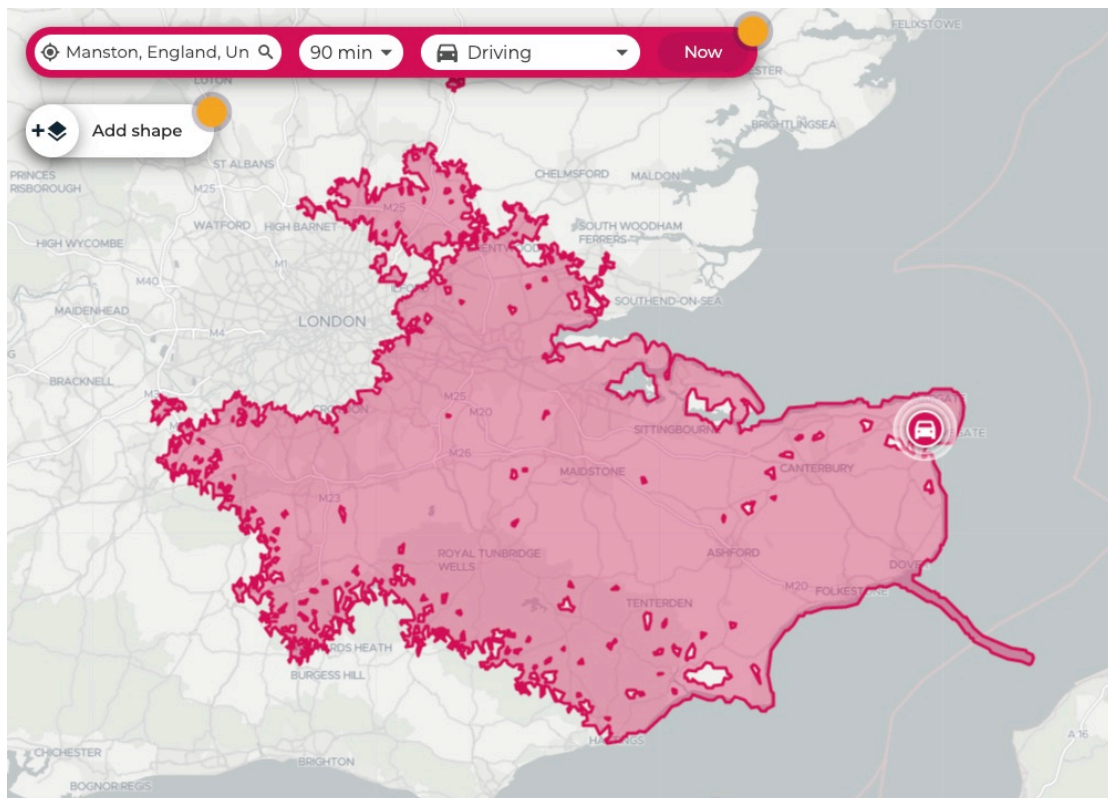
6. We respectfully draw the Examining Authority’s attention to Paragraphs 4.2.25 of [REP3-010] which states that:

“Point 2 of paragraph 1.13 states that a modelled 40km distance from the airport equates to approximately to a 45 minute drive...”

7. This does not marry with the Applicant’s Deadline 8 definition of “local labour“ as “those living within a 90-minute commute of Manston Airport” or with Thanet being the local area.

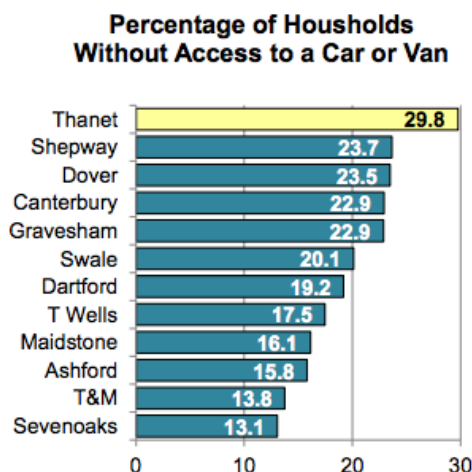
- 8. We respectfully strongly request of the Examining Authority that the Applicant must be held to a standard.**

9. **There must be a robust and disciplined approach to the preparation, collation and dissemination of evidence by the Applicant for Examination. For example by using clear transparent definitions that each party understands and by not skewing data to exaggerate the economic impacts. Without such rigour, comments on jobs/employment in the Thanet District Council Local Impact Report are Applicant biased and deeply flawed.**
10. As the Examining Authority will be aware a 90-minute commute by train will take you to London St Pancras and therefore would include London up to and including Stratford, Ebbsfleet and Kings Cross.
11. Further, we respectfully draw your attention to the following map showing 90 minute commute by car to and from Manston airport.



12. It is therefore unclear how the Applicant can claim a “*Local: major beneficial significance*” but of “*Regional: negligible significance*” when the Applicant’s population reach of Local fits within the population reach of *beyond* Regional.
13. **We robustly recommend the Examining Authority recommends that the Applicant’s proposed Scheme would therefore be of Local: negligible significance as well as Regional: negligible significance in relation to socio-economic impact.**
14. Further, it is still unclear what type of jobs will be created as a result of the proposed Scheme. If the majority of jobs are lower skilled and low paid jobs then people are less likely to travel beyond 20km as this may not be economically viable¹.
15. The draft Thanet Transport Strategy 2015-2031 of July 2018² at paragraph 5.2.2 states that:

“This data suggests that 30% of the district’s population live in households with no cars/vans compared to just 20% for the whole KCC area. The average car ownership across the district is the lowest in the county” (underline added for emphasis).



¹ [REP3-010]

² [https://consult.thanet.gov.uk/gf2.ti/-/875394/39880005.1/PDF/-/INDraft Thanet Transport Strategy July 18.pdf](https://consult.thanet.gov.uk/gf2.ti/-/875394/39880005.1/PDF/-/INDraft%20Thanet%20Transport%20Strategy%20July%2018.pdf)

16. When viewed across Kent let alone within the Applicant's definition of 'Local' which extends far beyond Kent the accessibility implications and barriers for job-seekers in Thanet compared to those outside of the district to work at the former Manston site (if the Applicant scheme is granted) is clear.
17. This is of particular concern in light of the socio-economic demographic of Ramsgate and perhaps engages the Equality Act 2010.
18. The draft Thanet Transport Strategy 2015-2031 of July 2018³ at paragraph 5.2.3 states that:

"This can have accessibility implications for particular groups as when the car is being used (for example during the working day) other household members do not have access to the car and must rely on Public Transport. Likewise, where households have no car/van reliance on other forms of transport is high" (underline added for emphasis).
19. We respectfully remind the Examining Authority that the Applicant has submitted at Page 81 of the REAC merely a proposal to enhance as 'appropriate' local bus services to accommodate increase staff in the area.
20. This proposal by the Applicant is not enshrined in the draft DCO.
21. The Applicant does not appear to have made any cost provisions for local bus services within RSP Business Plan for Manston submitted at Appendix CAH2 - 15 to the Summary of Applicant's Oral Submissions at the Compulsory Acquisition Hearing on 4 June 2019 and associated appendices [[REP8-011](#)].

³ https://consult.thanet.gov.uk/gf2.ti/-/875394/39880005.1/PDF/-/INDraft_Thanet_Transport_Strategy_July_18.pdf

Cumulative Impacts

22. We respectfully draw the Examining Authority's attention to Paragraphs 4.2.29 of [REP3-010] which states that:

"The study area for Lydd Airport as defined in their ES overlaps with the study area of Manston Airport. Therefore, there may be some conflict regarding the socioeconomic impacts associated between Manston Airport and the development permitted at Lydd Airport. Despite this potential issue, it appears that Lydd Airport has not been considered in the application or within the ES as a potential cumulative effect particularly for the socio-economic impacts".

23. As the Examining Authority will be aware London Biggin Hill Airport that is also located within the Applicant's definition of 'Local' has future plans. These include the creation of new jobs at the airport within the next twenty years as part of its LoCATE strategy⁴. LoCATE (London Centre for Aviation, Technology and Enterprise) is a partnership of public and private sector organisations promoting London Biggin Hill Airport as a primary centre for the aerospace industry in the capital. It sets out London Biggin Hill's vision for a sustainable future for both the airport and the local community by investing in infrastructure, skills development, training and job creation⁵.

24. London Biggin Hill Airport is some 79 minutes/ 98 minutes commute to the Spitfire & Hurricane Memorial Museum. Therefore, there may be some conflict regarding the socioeconomic impacts associated between Manston Airport and the development permitted at London Biggin Hill Airport (in addition to Lydd Airport). Despite this potential issue, it appears that London Biggin Hill Airport (in addition to Lydd Airport) has not been considered in the application or within the ES as a potential cumulative effect particularly for the socio-economic impacts.

⁴ <https://www.bigginhillairport.com/2018/01/london-biggin-hill-sets-out-ambitions-for-2018-and-beyond/>

⁵ *Ibid*

25. As the Examining Authority will be aware the Applicant stated in its response to the first written questions at SE.1.1 at [REP3-195] that:
- “There are a wide range of national and international destinations accessible to residents in Thanet, via existing airports...Gatwick ([90 minutes] 1.5 hours drive time from Margate), Heathrow (circa 2 hours [drive time]) and to a lesser extent London City Airport (circa 2 hours [drive time])”.*
26. As the Examining Authority will be aware Gatwick, Heathrow and London City Airport all have significant expansion plans. For example the owners of Gatwick (Vinci Airports) plan to spend £1.1bn on a range of passenger improvements by 2023 and to increase by almost a half to 70 million passengers annually⁶. Heathrow’s plans are well known as are London City.
27. Therefore, there may be some conflict regarding the socioeconomic impacts associated between Manston Airport and the developments planned at Gatwick, Heathrow and London City (in addition to Lydd Airport and London Biggin Hill Airport). Despite this potential issue, it appears that expansion plans at Gatwick, Heathrow and London City (in addition to Lydd Airport and London Biggin Hill Airport) all in the SE have not been considered in the application or within the ES as a potential cumulative effect particularly for the socio-economic impacts.
28. Currently, in London and South East: Heathrow, Southampton, Gatwick, Bournemouth, London Biggin Hill, London City Airport, Luton, Southend all have expansion plans.
29. **The Applicant has not considered the expansion plans of airports within a 90-minute commute of Manston Airport (or the wider London and South East region) in its application or within the ES .**

⁶ <https://www.independent.co.uk/travel/news-and-advice/gatwick-airport-heathrow-vinci-lyon-lisbon-kansai-robot-car-parking-a8912661.html>

30. **The Applicant has not considered the expansion plans of airports within a 90-minute commute of Manston Airport (or the wider London and South East region) in its application or within the ES as a potential cumulative effect particularly for the socio-economic impacts. Therefore it cannot rule out cumulative effects and it cannot be determined whether there is any socio-economic beneficial significance, whether minor, major or moderate.**
31. **We robustly recommend the Examining Authority recommend that it cannot be determined whether there is any socio-economic beneficial significance, and whether minor, major or moderate.**
32. Employment Jobs
33. As the Examining Authority will be aware **since the closure of the former airport**, 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 Thanet⁷.
34. Thanet's job density remains below the national and regional averages. According to the latest ONS figures, however, the gap has closed in recent years. The ratio of total jobs to the 16-64 year-old population has risen by 23% since the airport closed⁸ compared to a 2% rise for the South East and a rise in 6% in Great Britain⁹ [\[REP6-034\]](#).

⁷ *Economic Impact of Tourism Thanet – 2017 Results November 2018*, Commissioned by Visit Kent and Produced by Destination Research

⁸ The ratio of total jobs to the 16-64 year-old Thanet population has risen from 0.57 in 2014 to 0.7 in 2017. The figures for the South East/Great Britain were 0.84/0.81 in 2014, and 0.87/0.86 in 2017. Source

http://www.nomisweb.co.uk/reports/lmp/la/1946157320/subreports/jd_time_series/report.aspx?

⁹ The ratio of total jobs to the 16-64 year-old Thanet population has risen from 0.57 in 2014 to 0.7 in 2017. The figures for the South East/Great Britain were 0.84/0.81 in 2014, and 0.87/0.86 in 2017. Source

http://www.nomisweb.co.uk/reports/lmp/la/1946157320/subreports/jd_time_series/report.aspx?

Economically Inactive

35. We respectfully make an overall comment that at Pages 33 and 79 of REAC [\[REP8-018\]](#) have been based on “*assumption(s) taken from E&H 2017*”. It is unclear what E&H 2017 is and it is had not been correctly referenced here or anywhere else in the document. Therefore it has not been possible to verify this assumption(s).
36. At Page 33 of REAC [\[REP8-018\]](#) the Applicant alleges for **construction** jobs that:
- “There is further scope to employ those who are currently unemployed; assumption that approximately 1,800 jobs may be provided to those currently unemployed”.*
37. We draw the Examining’s Authority to an analysis of the Economically Inactive in Thanet submitted at [\[REP6-034\]](#). The share of economically inactive in Thanet who report that they do not want a job has risen substantially¹⁰ with the long-term sick accounting for the largest share of economically inactive¹¹, displacing those who look after the family/home according to the latest statistics.
38. Last year in Thanet the total number of economically inactive was 20,900¹². Out of this number 18,800 (90.2%)¹³ did not want a job [\[REP6-034\]](#). This number can be broken down even further into the number of long-term sick and looking after family totalling 13,200¹⁴.

¹⁰

http://www.nomisweb.co.uk/reports/lmp/la/1946157320/subreports/einact_time_series/report.aspx?

¹¹

http://www.nomisweb.co.uk/reports/lmp/la/1946157320/subreports/einact_time_series/report.aspx?

¹²

http://www.nomisweb.co.uk/reports/lmp/la/1946157320/subreports/einact_time_series/report.aspx?

¹³

http://www.nomisweb.co.uk/reports/lmp/la/1946157320/subreports/einact_time_series/report.aspx?

¹⁴ Look after Family/home 5,500 and Long-term sick 7,700. Source >

http://www.nomisweb.co.uk/reports/lmp/la/1946157320/subreports/einact_time_series/report.aspx? [REP6-034]

39. Therefore last year a total of 2100 people in Thanet (20,900-18,800) were economically inactive *and* wanting a job.
40. The assumption by the Applicant that 86% (1800/2100) of all those in 1) Thanet; 2) economically inactive; and 3) wanting a job would be not only employed by the Applicant; but 4) employed in construction jobs (At Page 35 of REAC [\[REP8-018\]](#)) is a very high percentage.
41. We note that the number submitted by the Applicant is unsubstantiated and is without supporting evidence or evidence-backed rationale.
42. We further note that the Applicant has not proposed to provide any training or skills or support as part of this proposed mitigation.
43. Further, at Page 79 of REAC [\[REP8-018\]](#) the Applicant double counts this benefit again alleging the exact same number but this time for **operational jobs**:
“There is further scope to employ those who are currently unemployed; assumption that approximately 1,800 jobs may be provided to those currently unemployed”.
44. The assumption by the Applicant that 86% (1800/2100) of all those in 1) Thanet; 2) economically inactive; and 3) wanting a job would be not only employed by the Applicant; but 4) employed in operational jobs (At Page 79 of REAC [\[REP8-018\]](#)) is a very high percentage.
45. We, again, note that the number submitted by the Applicant is unsubstantiated and is without supporting evidence or evidence-backed rationale.
46. On current figures (2018) Thanet did not have 3600 (1800+1800) people who were economically inactive *and* wanting a job.

47. The Applicant is either forecasting that the number of unemployed people in Thanet will **rise** during the operation of the airport which essentially supports reports by Falcon, AviaSolutions (two) and York Aviation etc that an airport on the former Manston site is not viable.
48. Or, the Applicant assumes the same unemployed people will work both in construction and operational jobs. This is highly improbable.
49. Or, that proposed scheme negatively impacts the tourism industry in which 1 person in 5 in Thanet¹⁵ are currently employed (ie tourism jobs drop due to planes impact). This is highly probable.
- 50. We robustly recommend the Examining Authority recommend that it cannot be determined whether there is any post mitigation effect from the mitigation proposal at Page 33 of REAC [REP8-018] - *There is further scope to employ those who are currently unemployed; assumption that approximately 1,800 jobs may be provided to those currently unemployed – and whether minor, major or moderate.***

15

https://www.visitkentbusiness.co.uk/library/Cambridge_Model_2018/Thanets_Visitor_Economy.pdfT
hanet'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. Source <https://www.thanet.gov.uk/thanets-tourism-economy-now-worth-319m-as-visitor-numbers-rise-to-4-2-million-in-2017/>

51. We robustly recommend the Examining Authority recommend that it cannot be determined whether there is any post mitigation effect from the mitigation proposal at Page 79 of REAC [\[REP8-018\]](#) - *There is further scope to employ those who are currently unemployed; assumption that approximately 1,800 jobs may be provided to those currently unemployed* – and whether minor, major or moderate.