

**Manston Airport Development Consent Order  
Examination Stage –  
Deadline 9 July 2019**

**Applicant Assertion on Adverse Impacts and Benefits**

A submission by The Ramsgate Society and the Ramsgate Heritage and Design Forum

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Dear Sirs,

As the ExA in the Fifth Questions you posed the following:

**CA.5.1** The Applicant Stone Hill Park Ltd (SHP) Acquisition by Agreement

A letter from BDB Pitmans LLP dated 2 July 2019 [AS-index number to be allocated informs the ExA that a subsidiary company of the Applicant, RiverOak MSE Ltd, has exchanged contracts with SHP on 2 July 2019 for the purchase of all of the land it owns at Manston Airport.

To the Applicant iv.

Given this, provide a statement setting out your view of the implications of this development by Deadline 11 on 5 July 2019; and v. given this, provide a final version of the Book of Reference with a statement of any amendments by 23:59 on 9 July 2019. Applicant's Response: i. n/a ii. n/a iii. n/a iv.

Applicant response

*'The Applicant has prepared an overall summary of case that is submitted at Deadline 11 as TR020002/D11/OSOC. The particular features relating to the acquisition of the site can be summarised as follows:*

*- The scope of outright compulsory acquisition has reduced by 99% since the application was made, considerably reducing the adverse impacts of the project; -Adverse impacts will now rise and fall in proportion to the benefits of the project; the more it succeeds the greater the adverse impacts will be but it is the Applicant's case that given the mitigation now proposed these will always be substantially outweighed by the benefits; - The purported alternative use for the site proposed by Stone Hill Park falls away and should be disregarded to*

*the extent that its frustration was seen as an adverse impact; Manston Airport DCO –*

We take great exception to the response from the Applicant. This is once again merely an unsubstantiated 'assertion', with no evidence whatsoever. The Applicant, during the course of the EIP was unable to demonstrate that benefits would outweigh adverse impacts, far from it. Expert testimony revealed' for example' that job creation forecasts were grossly exaggerated by the misapplication of multipliers and the use of a deeply flawed methodology. The response refers to a phenomenon termed "success" without explaining how it would be constituted and how it would be measured, yet they assert that derived 'benefits' would always outstrip (what we know to be well known and measurable) adverse effects. There is, for example, no demonstrable linear correlation between adverse effects and benefits (however measured). This is yet another evasive response from the Applicant, based on assertion, devoid of evidence, begging yet more questions, 'running down the clock'.

This is further evidence of the lack of good faith by the Applicant in participation in the EIP. We urge you once again to recommend rejection of this DCO application.

John Walker, Chair, The Ramsgate Society  
Richard Oades, Vice Chair, The Ramsgate Society  
Nigel Phethean, Ramsgate Heritage and Design Forum