

Susan Anderson

Head of Transport infrastructure planning

Department for Transport

Dear Ms Anderson

30th January 2020

Application by RiverOak Strategic Partners (RSP) for a Development Consent Order (DCO) for the reopening and development of Manston Airport

I write in response to your letter of 17 January 2020 requesting comments and further information in respect of the application by RSP for a DCO for the reopening and development of Manston Airport as a major international hub for air freight.

I do so as chairman of The Ramsgate Society and as a member of The Ramsgate Heritage and Design Forum which together represent and promote the interest of the town of Ramsgate and its rich and varied heritage which underpin the local economy.

We have closely followed and engaged in the DCO process from its outset.

Our position throughout has been to safeguard the interests and well-being of the residents and businesses of the town and its heritage. We are not averse to development generally, but this must add value and especially respect and enhance the quality of Ramsgate's built environment, characterised by its numerous listed buildings, Conservation Areas and Royal Harbour. In our view this proposal fails to meet these basic tests.

The proximity of the airport to Ramsgate and our experience of its previous commercial aviation uses, which even at the low level of flights then recorded gave rise to unacceptable noise and disturbance, has informed our position. In the evidence submitted at the Examination stage we set our grounds for opposition to RSP's proposals for development of the airport This centred on two main issues:

- The absence of any objective and reliable evidence of the need for a major expansion of aviation use, in particular of air freight.
- The adverse impact which such development would have on the town and measures currently being undertaken to promote its heritage and revive its economy via the Heritage Action Zone (HAZ) programme.

Our initial comments relate to the late submissions submitted by Five10Twelve Limited referred to at paragraphs 23, 24 and 26 of your letter and specifically to:

- Rebuttal to the Applicant's Overall Need Case (letter dated 17 October 2019)

- Public cost and reputational risk (letter dated 23 December 2019)

and also to:

- paragraph 16 – Draft DCO Heritage Assets
- paragraph 18 – Draft DCO – night flights

Rebuttal to the Applicant’s Overall Need Case

Four days before closure of the Examination Stage and immediately post Stone Hill Park’s (SHP) withdrawal of its Representations and objections to the DCO, RSP submitted a document headed **‘Applicant’s Overall Summary Of Need’** dated 5 July 2019. This had not been requested by the Examining Authority (ExA) and with only one working day left before closure on 9 July 2019 was not subject to any public scrutiny at the EIP.

The document is significant as it seeks to re-assert the case for the project following six months of detailed and challenging public scrutiny of RSP’s evidence. It is particularly noteworthy for its attempt to downplay and undermine the evidence of **York Aviation**, expert advisers to SHP, as set out in a supplement to the main document.

We are grateful to Five10Twelve Limited for their foresight in seeing the need to scrutinise and challenge the assertions made by RSP and commend their detailed analysis and rebuttal of the RSP late intervention. The key points of their submission are:

- RSP’s case is purely speculative and not supported by any reliable and independent evidence of the need for an additional dedicated airfreight airport in the South East, over and above developments already in the pipeline. Their cavalier ‘give it a go’ approach is entirely inappropriate and unjustified.
- The development of Manston as a major international hub for air freight is not referred to or relied upon in any national aviation policy document.
- As there is no NPS there is no policy presumption that a need exists. Even if evidence did exist, other and better placed and currently operating airports which are seeking and have capacity to expand, such as Stanstead, is where expansion would be justified and supported by the air freight market.
- To attract the necessary air cargo business to meet the National Significant Infrastructure Investment (NSIP) requirements, RSP must be able to achieve a 10,000 increase in air transport movements per annum. Manston has no operational airspace presently, its current capacity is zero, so to deliver this major growth requires a credible and commercially sound business plan, with supporting infrastructure and third-party logistics, to demonstrate its viability to investors and air freight users. **No such plan exists.**
- RSP’s reliance on evidence provided by Dr Sally Dixon, a freelance contractor with limited experience of the aviation or air freight business, as opposed to

that of Louise Condon, York Aviation's Managing Partner, the well respected and highly knowledgeable expert on the aviation and air freight market, is unjustified and calls into question the validity of the RSP's case given that the requirement for a compulsory purchase order is no longer necessary.

Public cost and reputational risk

In their last submission Five10Twelve Limited draws on the analysis summarised above and point up several hidden, yet significant public costs, national risks and reputational risks to government inherent in RSP's application. We support the matters raised by Five10Twelve Limited and summarise below our own view of the risks and uncertainties presented by the application.

Major risk and uncertainty

There are two potentially 'game-changing' uncertainties surrounding the reopening of Manston: the request for airspace from CAA, and the relocation of the Ministry of Defence High Resolution Direction Finder (HRDF), being a vital element of our national defence infrastructure. Each is mutually exclusive, each is essential to reopening the airport, each will take several years to resolve, and each process could result in failure. In which case the airport could not be developed.

- **CAA Air space change process**

An airport cannot operate without permission from the CAA for the use of specific airspace. The Applicant expects to submit an airspace change proposal to the CAA in May 2021. Only then will the 110 week CAP 1616 process begin. Therefore, the earliest date for a CAA decision on airspace is August 2023. The CAA can reject an application on operational or environmental grounds, or because of inadequate or flawed consultation and has exercised that power. The Applicant has held a Non-Aviation Focus Group meeting in Ramsgate, neither we nor many other local groups, were invited. We have submitted a formal letter of complaint to the CAA. Airport development cannot begin unless and until an airspace proposal is approved, and that is far from certain

- **Ministry of Defence High Resolution Direction Finder (HRDF)**

The HRDF at Manston is an essential element of the UK defence infrastructure network. The reopening of Manston airport would be incompatible with the operation of the HRDF in its current location. It might be possible to locate a new HRDF on site, but this is not certain and would have to be subject to acceptance by MoD with up to two years of successful on-site testing, running in parallel with the existing HRDF. Only then could the original HRDF be decommissioned and removed. The MoD states that this process would have to fit in with the MoD

infrastructure renewal programme timeline. That programme information is not in the public domain. However, we believe that this programme has not yet started. Known unknowns are when the programme will start, where Manston is scheduled in the programme, how long the process of siting, procuring, delivering, installing and testing the new HRDF would take. Tests may reveal deficiencies such that the new HRDF is deemed to fail. The MoD would then continue to use the original HRDF. In these circumstances the airport could not reopen in accordance with the DCO.

Whilst we do not have full information, we expect that this process would take several years and certainly well beyond any CAA decision on airspace.

Environmental Blight

There were a great many well evidenced submissions to the ExA on the harm to the environment, health, well-being, the local economy, and heritage assets in Ramsgate from the direct and indirect effects of air pollution and noise that would be brought about by an airport operating at the scale proposed in the DCO.

In addition the issues of Airspace and the HRDF would each bring about a wholly unacceptable level of uncertainty to the local area and to Ramsgate in particular.

For up to five years the future if the Manston site would be in the balance. Ramsgate would be blighted by long term uncertainty. It would put a brake on domestic and business investment, properties would not be adequately maintained or refurbished. The influx of new often more prosperous inward migration would cease, others would leave. Our heritage assets would deteriorate through lack of investment.

Climate Change

The RSP proposal flies in the face of the urgent reality of Climate Change and the overriding importance this has now assumed in the political agenda. Moreover, failure to give due weight to the negative consequences of carbon emissions - especially given growing national and international concern over global warming – would send very negative signals to the electorate about whether the new government was genuine in its concerns about these pressing environmental issues.

Specifically this proposal would fly in the face of the following measures:

1. The British Government has declared a carbon neutral strategy by 2050.
2. The EU has declared a zero emissions strategy by 2050
3. Kent County Council has declared a carbon neutral strategy by 2050
4. Thanet District Council has declared a carbon neutral strategy by 2050.
5. Ramsgate Town Council has declared a carbon neutral strategy by 2030.

Thanet is a relatively aviation free zone but if this project is approved it will be subject to a new and seriously damaging range of aviation pollutants which the above measures were specifically introduced to prevent.

This is the first Airport DCO project to come forward and it is being closely watched by the proponents of Heathrow, Gatwick and others intending to follow this route. It will be vitally important therefore that the Secretary of State is consistent when applying environmental standards. There can't be one set of standards for Gatwick, Heathrow or Stansted and another lesser standard applied to Manston.

Opportunity Cost

There is a major opportunity cost attached to granting this DCO. The Thanet District Council Draft Local Plan has recently been the subject of a Local Plan Inquiry. Proposed Policy SP05 provides that if the site is not used for aviation then the alternative use would be for housing and employment uses. Government policy recognises that there is a need for up to 300,000 houses per annum in England, and demand is greatest in the South East Region. The Manston site has been shown to be capable of providing 4000 new homes and up to 80,000 sq. metres of employment uses with thousands of permanent jobs. This opportunity for much needed new homes and new jobs would be lost if this DCO was granted.

Reputational Risk

We consider there would be a serious reputational risk to the government and DfT if this DCO was granted and then failed to come into operation due to lack of business credibility and viability.

The similarities with the recent Seaborne Ferries debacle in Ramsgate will not be lost on anyone who has looked into this case and a repeat of the same outcome would be very damaging for the credibility of the planning process, the Department for Transport and for the Secretary of State.

Paragraph 16 – Draft DCO Heritage Assets

We have consistently complained that assessments of harm to heritage assets of national significance have been narrowly restricted to the DCO application site plus a 1km wide perimeter zone. This has had the (intended) effect of grossly under-assessing the extent of harm to the majority of affected heritage assets and their settings.

This very restricted zone scopes out Ramsgate, the boundary of which is only 1.2km from the airfield perimeter fence. The intention here is clear- to avoid having to acknowledge the serious harm to a great many heritage assets in the town. Ramsgate has 454 listed properties, five conservation areas, and was awarded Heritage Action Zone status by Historic England in 2017. We assert that Article 6(3) and Requirement 3(3) should not be restricted to the “development masterplan” area as drafted but should relate to **all impacts** “...likely to harm heritage assets”. Furthermore, 'harm' should encompass socio-economic, health, cultural, and not just physical damage to historic buildings.

Paragraph 18 Draft DCO – night flights

The new requirement 21(4) begs the question: What passenger air transport departures/arrivals will be permitted between the hours of 20.00hrs and 16.00hrs the next day?

In Summary

- There is no verifiable evidence that an airfreight cargo hub at Manston is needed or in the national interest.
- The evidence of previous aviation operations at Manston suggest that the RSP proposal will be a commercial failure not least because of its geographical location, which cannot be changed.
- The proposal would be harmful to the environment and to the health of local people by virtue of excessive noise and pollution.
- The proposal runs totally contrary to the Climate Change Agenda recently adopted by the British Government and others.
- If a DCO were to be granted the inevitable uncertainty and delay that would follow would bring blight and social, economic, environmental and cultural harm.
- The grounds for refusal of this DCO are overwhelming.
- We urge the Secretary of State to refuse this application.

John Walker
Chairman
The Ramsgate Society
30th January 2020