



31 January 2020

The Planning Inspectorate
Manston Airport Case Team
Kite Wing
Temple Quay House
Bristol BS1 6PN

Dear PINS

Registered Interested Party number 20013534

Application by RiverOak Strategic Partners Ltd for an Order granting Development Request consent for the reopening and development of Manston Airport in Kent

I am writing as requested, as an 'other affected party', to provide further information and/or comments on the matters set out in your letter of 17 January 2020.

Unilateral undertakings

3. I note and respect you have asked Kent County Council on the acceptability and adequacy of the Applicant's contribution of £139,000 per year for affected schools for 20 years to mitigate and minimise the noise effect on schools.

As a resident of Ramsgate Kent, I would also like to highlight that this equates to the sum of £13.99 per child, based on the simple calculation of 9935 children currently in a school under a flightpath, as evidenced in this examination and submitted to PINS. This sum is woefully inadequate for noise insulation in many school buildings, which are also heritage structures and subject to stringent planning regulations. Irrespective of this mournful compensatory offer, is RSP proposing all classes with effect from the first cargo plane taking off, move inside permanently?

Is £13.99 per child the cost of a ruined education in Ramsgate?

I am disappointed that noise appears again, to be the 'Cinderella' character in this latest round of DCO record breaking numbers of questions as again, I reiterate my concerns that noise mitigation remains a top priority for communities blighted by proximity to aviation operations, and we have been failed by RSP in their desultory compensatory offers. Or worst, that we are supposed to go with cap, doffed in hand, to ask for money from the community fund should they break the rules. Like they did over and over in the past. The impact of noise is well documented, but I refer you again to the work published by the CAA¹ which if considered alongside routine readings of >100DB in the grounds of Chatham and Clarendon Grammar School when Manston was last operating, you will

¹ <https://www.caa.co.uk/Consumers/Environment/Noise/Aviation-noise-and-health/>

appreciate our shock and dismay that a DCO proposal that would offer a cargo plane low over this school every 10 minutes, to be a prospect we remain unable to understand.

How can it be that there is no ongoing query by PINS or the Secretary of State in respect of the equally desultory compensatory noise compensation for Ramsgate residents under those inaccurate RSP flight paths?

Not only have fit for purpose flight paths been commissioned and paid for by individual residents, it is clear that the real truth of this DCO is the potential monstrous noise impact on the town of Ramsgate and the singular failure of RSP to explain the justification for the horrific impact this cargo hub will have on our health and our town. They have been unable to do so as there simply is no justification for this cargo hub proposal dreamed up. This plan seems to offer fake numbers on jobs, and fake assurances on impact. No evidence supports these wild claims and yet over and over, here we are rebutting this inconceivable plan and suffering constant suggestion that this is 'all in the bag'.

On the basis that there is zero evidence to prove that the human cost of noise impact on Ramsgate is less significant than a cargo hub allegedly in the national interest, this DCO should be refused.

Draft Development Consent Order

15 Suggested amendment

“‘Airport related’ means development directly related to, and required to, support operations at Manston which are considered relevant *only* to that of a project deemed of national significance and importance under the NSIP definition. For the avoidance of confusion, this would not include a flight training school, nor air show activities nor any aviation leisure activities on the reasonable basis these do not fall within the parameters of an NSIP”.

Draft Development Consent Order

18 Comments

This DCO is for a cargo operation, I am unclear why there is reference to passenger flights? The clause should presumably read;

“No air transport departures or landings, whether scheduled or chartered or late running will take place between the hours of 6pm to 8am”.

On the basis that RSP has failed to be clear about whether they want cargo or passenger ATMs this DCO should be refused. The business plan is unclear. The ATMs change with the weather. This latest query confirms the ongoing obfuscation in the content of this application. DCO applicants are not supposed to make their application impenetrable.

Late Representations

The applicant RSP declared publicly their intent to liaise directly with the Secretary of State once the examination period had finished. From the Isle of Thanet News; 3 July 2019

“Any submissions made after 9 July 2019 will be made to the Secretary of State for Transport.”

²This bold confession that from the end of the examination period onwards, RSP intended to appear to want to negotiate behind closed doors directly with the SoS was an emotional body blow. This was also at the same time when great swathes of questions remaining unanswered by RSP, and when they showed through this back-door route, a new level of disrespect to the rigour of the DCO inspection process.

It seemed to speak to my worst fears, my concern that this application was already a sealed deal behind the curtain and this inspection was a whitewash. Many people in our community think this, but I have preferred to have trust in the inspection process, and in a fair and evidence-based decision pending. It is hard to maintain this faith, when the applicant publicly declares they’re carrying on regardless, away from scrutiny, trying to curry favour with those in power seeking to fire up their own airline company. Please tell me my belief in our system is not corrupted by refusing quite rightly, this DCO that doesn’t add up.

Obsessive public political support for Manston is also well documented by the MP for Thanet North, ██████████ (self-confessed spokesperson for RSP) who has repeatedly confirmed he will resign if Manston doesn’t reopen³. If we look to the south we have ██████████, the MP who forgot he owned an airline⁴.

I respect the right of any individual to have an interest in, or avid support for, aviation. However, this persistent attempt by a failed airport operator to reopen over and over and over again at Manston, coupled with the energetic and enthusiastic cheer leading pincer movement from our MPs, seems too close for comfort for the rationalists amongst us.

Why is there such political goodwill towards this dormant airfield? Is it because MPs like ██████████ continue to spout ‘anti London’ rhetoric to anyone who will listen?

Why have our MPs and Manston supporters made this a political issue?

Why do they fail to recognise plenty of Conservative voters oppose Manston?

Why do they suggest they have a mandate for Manston merely by holding office?

I wrote to the Secretary of State and PINS to query why, and how, this back door route appeared to be permitted and would again request sight of all correspondence between RSP to PINS and the Secretary of State to be published on the PINS website when the current representations are also uploaded. We are entitled to see this examination, and to scrutinise any casual attempts by RSP to operate undercover. I was reassured that the Secretary of State confirmed that such content would be with the Inspectors. I assume the Secretary of State was just as shocked as we were, at this attempt by RSP to ride roughshod into Whitehall acting like they can do what they want.

² <https://theisleofthanetnews.com/2019/07/03/contracts-exchanged-agreeing-manston-airport-site-sale-to-riveroak/>

³ <https://www.kentlive.news/news/kent-news/riveroak-manston-airport-plans-unlawful-617788>

⁴ <https://www.independent.co.uk/news/uk/politics/craig-mackinlay-manston-airport-tory-mp-commons-rules-broken-a8400906.html>

On the basis that the applicant failed to comply with the examination process this DCO should be refused. On the basis the applicant has attempted to negotiate behind closed doors this DCO should be refused. Due diligence has not been followed, public faith in consultation and due process has been trashed.

23. Comments REP11-013 Five10Twelve

Document dated 17 October 2019

I commend this document and support all of its content. I would further comment:

Need

This has always been a primary contention. There is simply no evidence of a need for a cargo hub at Manston and I trust whoever is reading this, my latest document in a long list of documents already submitted, has experienced the same struggle I and thousands of others have, in endeavouring to find this holy grail content amongst the thousands of pages of poorly referenced and non-indexed documentation. I, alongside thousands of others, remain bemused how the application for the DCO was accepted for examination by Chris Grayling MP, when it did not fulfil the criteria of an NSIP.

The needs case is at best, speculative, and there is no evidence RSP has been able to supply any evidence which supports the case for need but it would appear this doesn't matter. It appears it is down to the residents to refute the needs assessment. Is it the case that simply putting it in a DCO application is evidence of need? Surely not.

If there was a need for an airport at Manston, it would not have gone successively bust.

If there was a need for a cargo hub at Manston, the cargo market would not be in decline.

Not only is there no need for a cargo hub at Manston, the business case also omits details of viability and as confirmed by Sally Dixon, employee of RSP and author of the only document which has ever supported an airport at Manston, the Azimuth report, she was not asked to explore whether the business case was viable. The business case appears to me, the aviation non expert, wildly optimistic and based on sentiment at best. The business case appears to be funded by ██████████ cash, stashed overseas and hidden away but does this cash really exist? Nobody knows.

On the basis there is no evidence of a need for a cargo hub at Manston, this DCO should be refused.

On the basis that mysterious unverified overseas cash is not acceptable funding for a start up venture, this DCO should be refused. TDC refused the CPO on this basis, the SoS would be quite right to follow suit.

Policy

It is clear that capacity exists elsewhere, and the UK government is committed to use of existing capacity at existing airports. Logic would conclude this cannot refer to Manson, as it is not an airport. It is a failed, ceased, former airport which has been shut for five years.

There were times during the public hearings that I felt I had landed in a parallel universe. I could not believe I was listening to confirmation by the author of the Azimuth report that viability was not part of what she had been requested to include in her document and when pressed further, that others from RSP suggested that the shortage cargo the UK might be desperate for included freeze dried fish, luxury cars and racehorses.

If this DCO content and the impact and distress it has caused to Thanet and Herne Bay was not so shocking, this might have been amusing. As it is, it is an insult in my view.

Capacity Constraints

These could be alleviated by supporting the 2nd runway at Gatwick, the 3rd runway at Heathrow or the use of existing capacity at East Midlands, Stansted or Luton. All five airports are on the fuel pipeline, and on major motorway connections and rail freight connections, should HM Government feel inclined to expand commercial aviation operations in the UK.

On the basis that Manston is only a tempting yes decision as it may be an easier decision than any of the five airports above, this DCO should be refused. Avoiding the weight of campaigns which are better funded, which attract more publicity, and which are more mobilised than the individual residents of Thanet, is no reason to blight us.

On the basis that capacity exists elsewhere, this DCO should be refused.

Trucking

Manston is at the end of a dual carriageway a very long way from the fuel pipeline. The A299 is not fit for purpose for a giant cargo hub and would not, and could not, cope with the associated explosion of vehicle traffic which would accompany the operation.

On the basis that there is no fit for purpose fuel solution to Manston, this DCO should be refused.

On the basis that RSP now appears to want to build a care home on the Jentex site, this DCO should be refused.⁵

Comments on Five10Twelve

Document dated 27 October 2019

I commend this document and support all of its content. I only wish my numerous representations to PINS in 2019 could have been so clearly articulated.

Further. How can a proposal for a huge cargo hub possibly co-exist in Thanet, where the District Council declared a climate emergency in 2019?

How can RSP support the governments zero carbon commitments?

⁵ <https://theisleofthanetnews.com/2020/01/13/councillors-to-discuss-application-for-extra-care-scheme-and-housing-at-jentex-oil-plant/>

Proposing aviation expansion with environmental credentials attached to it seems counter intuitive to me. Aviation is the biggest human-made polluter on the planet and RSP funding a few tree plantings in Thanet⁶ is also clearly designed to win some hearts and minds as we try to avoid thinking about aviation fuel routinely landing on our washing and our hair. Like it used to when Manston was last open. Just ask the residents of Nethercourt. Or those whose roof was lifted off.

On the basis that TDC has declared a Climate Emergency this DCO should be refused.

The true cost of the Manston DCO

I feel exhausted, as do thousands of us, at this latest prospect of writing again and again and again on the same subject. Residents, community groups, statutory bodies, interested parties. All commenting over and over and over on this dubious DCO application by [REDACTED] and his latest mystery bunch of overseas cash investors as RSP.

I am also let down by the MPs for Thanet North and Thanet South. I am let down by their lack of support for the majority opposed to this cargo hub, and I am disheartened by the constant suggestion that opposition to Manston is party political. It is not. Plenty of Conservative voters oppose Manston and there is no evidence to suggest otherwise.

Why is it that Thanet could not simply have been left to enjoy the heritage aviation plans in the application by Stone Hill Park for Manston when they owned the land? Ironically, most people in Thanet seem attracted by the prospect of a modest private aerodrome and occasional heritage flights.

I am also writing as a Ramsgate resident to reiterate my significant concerns about the real cost to our community which we are experiencing daily. It is only right and proper that the Secretary of State understands the context of where we live and the impact on our lives if we are to be assured of a fair, evidence-based decision. As the Right Honourable Secretary of State Grant Shapps said on 20 January 2020, 'HS2 needs to be fact based' and he is right to take this approach.

It is comforting to know that it is the only reason he believes a decision on a significant transport project can be taken. We assume, and cling to the hope that the same logic is applied to the Manston DCO.

The risk to Ramsgate

In 2019, the postcode for Ramsgate CT11 was the fastest rising property market in Kent ⁷ but I am deeply concerned to confirm that fast forward to now, and we have significant anecdotal evidence from various local media that uncertainty from the RSP plan is causing a slow down in house sales and purchases.

⁶ <https://theisleofthanetnews.com/2019/12/16/exclusive-new-group-to-re-green-thanet-with-1200-trees-thanks-to-successful-funding-bid/>

⁷ <https://www.kentlive.news/news/kent-news/kent-postcodes-highest-property-price-3031896>

It is also well evidenced that the local economy in Ramsgate is improving and continues to improve year on year since the airport shut five years ago.

In particular, the creative industries are flourishing and in a recent news article⁸ inviting local businesses to participate in a new Creative Economies thinktank, it was confirmed that *'building on the recent research published in autumn 2019, the event will launch the Creative Ramsgate Economic Report and will hear from high profile experts who are supporting the continued development of Ramsgate as a creative hub. Arts Council England has launched its much awaited new 10-year strategy this week and the event will be one of the first in the UK to give people a chance to hear this from the regional director.'*

On the basis that this DCO may send Ramsgate property markets into negative equity and a reversal of recent economic regeneration, this DCO should be rejected. On the basis this DCO will ruin the economic regeneration of our Heritage Action Zone⁹, our High Street Fund¹⁰ and our burgeoning creative economy this DCO should be rejected.

Comments on the late representation by Five10Twelve Ltd dated 23 December 2019

The Ramsgate Seaborne Ferry debacle is not something any of us would prefer to dwell upon, I am quite sure. Our heritage town, inhabited by some 40,000 people is experiencing a renaissance and significant new investment in our community, supported by the vibrancy of people choosing to move to this beautiful area. Within easy commute to London, the HS1 rail link has connected Thanet to the south eastern economy like never before.

I agree entirely with the document submitted by Five10Twelve and would urge you to consider the cost to the public purse, our community cohesion, the reputation of the DoT and these other matters with the utmost of gravity.

We know, some in our community lament the loss of days when the ferry worked, when the hovercraft ran and when a couple of flights a week took off for Amsterdam. These were golden years. I also deeply respect the historic connection Manston has to WW2 in particular. But, it cannot be the case that obsessively trying to recreate the past is the most certain path to future commercial success. In fact, it is undoubtedly doomed to fail.

Thanet needs continued regeneration, entrepreneurial spirit and to be supported by our MPs and by our Council who appears to change its leader and administration politics with alarming abandon, usually depending on the Manston issue, and taking us all round and round in years of circular debate.

Thankfully, we now appear to have a Council leadership and a Ramsgate Town Council with an evidence-based view of the defunct airport. It has to be said, this eventually was also the view of the former TDC UKIP administration.

We are exhausted but we are never giving up.

⁸ <https://theisleofthanetnews.com/2020/01/29/invite-to-creative-ramsgate-economic-report-launch/>

⁹ <https://historicengland.org.uk/services-skills/heritage-action-zones/ramsgate/>

¹⁰ <https://www.thanet.gov.uk/future-high-streets-fund/>

I acknowledge that we are well aware of the appetite to say yes to this DCO, the political goodwill is evident and public. However, we remain reliably committed to an evidence based decision that is in the interests of the UK and Thanet, and which doesn't rely on shady overseas cash being available to kickstart a process which is supposedly going to be overwhelmed by aviation providers queuing up to be based there. So far there are how many? None.

Comments on the representation from Mr Chris Lowe, dated 6 January 2020.

I support the entire content of this document. Climate change is a significant threat to us all. It is clear that the Government cannot achieve its carbon footprint targets with a bunch of half empty prehistoric cargo planes lumbering around in the Kent airspace. It is terrifying to read the evidence in support of the impact on our health of pollution emissions, and I am grateful for people like Mr Chris Lowe, Five10Twelve Ltd, NNF, Nethercourt Action Group and countless others who, together with the community, enables us residents of Ramsgate to find a voice, when all around us we appear to have been failed.

Thousands of people will leave the area if you let this hub open.

I urge you, implore you, beg you to reject this DCO. It doesn't add up.

Ramsgate deserves better.

Yours sincerely

Laura Marks
Ramsgate