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

Dear Manston Case Team

Thank you for the opportunity to submit further information for the attention of the Secretary of State in this matter.

I have lost track of the number of written submissions, oral presentations and other evidence that I and so many of my fellow residents have submitted during this DCO process.

On occasions our submissions may perhaps have appeared based on emotion - our deep concern for the town we love and our grave worries that it will effectively be destroyed if this proposal is approved – rather than on hard facts.

So, as there is no time to cover all aspects, in this final submission I intend to focus on two simple factual matters – some of the additional costs that are likely to be incurred by the public purse if this proposal is approved, and the reputational risks of the SoS approving it.

Regarding other aspects of this proposal, I would refer you to the detailed submissions of Five10Twelve Ltd and others which I fully endorse.

Additional costs to be met from the public purse: If the Secretary of State were to approve the DCO, many extra costs would be likely to be incurred by the public purse, including:

Direct costs:

1. **Substantial improvements to road and rail infrastructure:** Any airport must rely on good road and rail networks, and for a cargo airport these must permit quick and easy transportation to other areas. Such networks do not exist here. RSP Ltd propose to site a cargo airport on a promontory at the furthest south-eastern point of the UK, surrounded on three sides by sea. Howard Davis' Airport Commission rejected Manston out of hand as an overspill airport for London because of its poor road and rail links. The President of the Road Haulage Association commented that Manston was an inappropriate place to site a lorry park in the event of a no-deal Brexit for the same reason. A great deal of work would be required to bring our road and rail

network up to standard if a cargo airport was to thrive here. These costs are not built into RSP Ltd's costings and so would presumably be met from the public purse.

2. Flood prevention measures: Thanet was once an island, and climate change predictions suggest that it will be again within perhaps 25 years. Much of such road and rail network as exists in Thanet at present is likely to be substantially under water by 2045. So significant flood defences would be required if an airport at Manston was to be remotely viable. Obviously some of these might be required anyway, but the significantly higher volume of traffic that the airport would bring and the importance of speedy onward transport for cargo would make this an urgent priority. I am not aware of any mention of flood risk in RSP's proposals, so these costs would also presumably need to be met from the public purse.
3. Relocation of the Ministry of Defence High Resolution Direction Finder: I understand that the HRDF at Manston is a crucial element of our national defence infrastructure and that negotiations between the MoD and RSP Ltd on this matter have been fraught with difficulty. If it proves possible for the HRDF to be relocated at all, this is likely to be a protracted process involving at least two years of on-site testing and possible compensation for Cogent Ltd, the owners of the nearby Manston Green housing development where the HRDF may be re-sited. All of these costs would once again presumably need to be met from the public purse.
4. Adverse effects on the visitor economy: Ramsgate is a poor town where job prospects are very limited. The one area of the economy that is growing here is the visitor economy, which has prospered since the airport closed (after failing once again, for the third time) five years ago. I have referred in previous submissions in more detail to the likely effect of the noise and air pollution of at least 10,000 additional Air Traffic Movements per year on tourism on the Isle of Thanet. This is likely to result in business closures, job losses and more individuals and families becoming dependent upon State benefits, as other employment here is very limited.

Indirect costs:

5. Loss of inward investment: Since RSP first brought forward their plans, and throughout the lengthy Planning Inspectorate investigation, there has been a high degree of uncertainty regarding the future of the Manston site. This has required much rewriting of Thanet's Local Plan and caused significant difficulty for businesses and for those trying to encourage inward investment. The continuing uncertainty involved in resolving issues such as the need for the CAA to approve airspace for the new airport and the matter of the HRDF to be resolved with the MoD can only exacerbate this, making it less likely that external companies and agencies will wish to invest in Thanet, thereby condemning it to further decline. The result is likely to be increased dependence upon subsidies from the public purse for both individuals and organisations rather than a busy local economy where residents can thrive.

6. Public health costs: I and many other Interested Parties have discussed in some detail in previous submissions the likely impact on public health of the substantial noise and air pollution that would come with a cargo hub on our doorstep. These effects would come both directly – for example, from breathing in polluted air – and indirectly – for example, through the mental health impacts of interrupted sleep. The effects would be particularly severe for children and older people. Thanet has an older-than-average demographic and already suffers from much poorer than average physical and mental health. Its hospital services are already under threat and the subject of ongoing complaints, and its GP numbers per head of population are the fourth-worst in the country. Approval for RSP’s proposals would lead to much greater demand for a variety of local health services, which in turn would require substantially greater investment from the public purse.
7. Education and training costs: In previous submissions I have outlined Thanet’s poor educational outcomes. In areas such as this, FE providers (in our case East Kent College and training providers) find themselves picking up students at age 16 and ‘playing catch-up’ to compensate for poor previous educational experiences. Approval for an airport which would interrupt lessons during the day and disturb children’s sleep at night would further damage the education of our young people, reducing their chances of gaining decent jobs, and requiring schools & FE providers to work longer, harder & at greater public expense to try to turn round young lives.
8. Heritage costs: Ramsgate is a town rich in heritage which features many listed buildings, many of them in poor repair and several formally designated as At Risk. The town has been designated a Heritage Action Zone by Historic England. If the DCO were to be approved, aircraft emissions and vibration would cause further damage to our already delicate historic buildings and sites, which in turn would require greater public investment if they were to be saved for posterity.
9. Opportunity costs: The previous owners of the Manston site proposed mixed use, with housing, a business park and leisure facilities. Thanet is required by the Secretary of State for Housing to provide some 17,000 new homes: under the previous plans, around 4,000 of these, with associated infrastructure paid for by the developer, would have been sited at Manston, along with 80,000 square metres of employment space offering opportunities for the high quality jobs and training that the area needs. If the Secretary of State were to grant the DCO, these opportunities would be lost, resulting in the loss of agricultural land for housing and depressing the number of well-paid jobs in the area, adversely affecting its overall prosperity.
10. Legal costs: The Planning Inspectorate bases its advice partly on the impact of new projects on key Government commitments, such as the commitment to carbon-neutrality by 2050. Where a SoS overrules PINS in such circumstances, this is likely to be challenged in the courts. An example currently in the news is the Drax power station in North Yorkshire, where environmental lawyers Client Earth have been given permission to bring a Judicial Review against the Government, whose decision

to proceed with the power station project against PINS advice undermines their climate change commitments. If the SoS were to approve an airport at Manston, it is likely a similar legal challenge would follow, on the basis that airport expansion in any form undermines the Government's net-zero commitments, but creating a new cargo airport from scratch in the busy SE would appear a particularly extreme example of acting against the provisions of the Climate Change Act of 2008.

Reputational risks: This brings us on the reputational risks of such a decision, which include:

11. Business failure: RSP Ltd have no experience of running airports and appear to have no credible business plan. Their financial projections and operational assumptions have repeatedly been challenged by experts in the air freight industry such as York Aviation. RSP is effectively a start-up company in this field, so backing them to take on a National Strategic Infrastructure Project is a huge risk. If the Secretary of State were to approve the DCO but the airport were not to come into operation, or were to come into operation only to fail (as three previous attempts at running commercial airports on the site have done), this would not reflect well on the SoS or the Government. The SoS might remember the experiences of his predecessor Chris Grayling with Seaborne Freight, also in Ramsgate, before embarking on such a path.
12. Land grab: RSP Ltd are a real estate company. Only one of their Directors has any airport experience, and in his case the experience is that of the eternal optimist, with a string of failed airports adorning his CV. Were the airport to be approved but no serious attempt made to get it up and running, only for the company to decide after a decent interval that they should give up and build houses instead, cynics might suggest that the airport proposal had been a ploy to obtain the land at a knock-down price and that the Secretary of State had been duped – not good for his reputation.
13. Climate catastrophe: By far the most serious reputational risk for the Secretary of State if this proposal were to be approved is its implications for the Government's commitment to tackling climate change. Aviation contributes substantially to climate change and the Government has committed to achieving net zero carbon emissions by 2050. Airport expansion is incompatible with this commitment, and if the SoS were to approve a wholly new cargo airport this would greatly undermine the public perception of the Government's commitment to achieving this target. With 85% of the public in a recent MORI poll expressing concern about climate change and over half believing the net zero target date should be brought forward, such a decision would be likely to be as damaging to the Secretary of State's and his Government's credibility as it would be to our planet.

For all these reasons and many more outlined in my and others' previous submissions, I urge the Secretary of State to reject this DCO application.

Patricia Austin
Secretary, Ramsgate Town Team