

From: [REDACTED]
To: [Manston Airport](#)
Subject: RESENDING: Manston - SoS Consultation - Submission re Local and Regional Policies
Date: 06 July 2021 20:19:52
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FOR THE ATTENTION OF THE MANSTON AIRPORT CASE TEAM

RESENDING WITH ATTACHMENT

Dear Sirs

Please find attached our submission, (our ref SoS/R/014), with regards to the Secretary of State's call for representations relating to the Matter of Local and Regional Policies which may inform the level of need (or otherwise) for the services that the Development would provide.

Please note we will be submitting further representations relating to this and other matters in due course before the 9th July deadline.

Please confirm and acknowledge receipt of this submission.

All the best
Jason and Samara Jones-Hall
Five10Twelve Ltd

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To: Secretary of State for Transport
% Planning Inspectorate,
National Infrastructure Planning

Date: 6 July 2021
Our Ref: SoS/R/014

Email: manstonairport@planninginspectorate.gov.uk

For the attention of the Manston Airport Case Team

Re: Local and Regional Policies (including any changes since 9 July 2020)

1. This submission is in response to the SoSFT's call for submissions relating to the extent to which local policies (including any changes since 9 July 2020) inform the level of need for the services that the Development would provide and the benefits that would be achieved from the Development.
2. Details of relevant local and regional strategies and policy documents are set out below.

3. **Thanet District Council ("TDC") Adopted Local Plan to 2031¹**

- 3.1. TDC Adopted Local Plan to 2031 ("**TDC Local Plan**") was formally adopted at the meeting of the Council on 9 July 2020, following Modifications recommended in the Planning Inspectorate Report on the Examination of the Thanet Local Plan, ("**PINS Report**"), dated 22 March 2020.²
- 3.2. Paragraph 1.22 of the TDC Local Plan confirms that Thanet's Economic Growth Strategy is **not** dependent on the proposed development, nor has any potential impact of the proposed development - whether positive or negative - been taken into account in the Economic Growth Strategy. It is simply not a factor. Para 1.22 states:

"The Economic Growth Strategy for Thanet identified transformational initiatives to focus on to deliver employment growth. These are:

- *Developing the Port at Ramsgate*
- *Investing in high value manufacturing and engineering across Thanet and east Kent*
- *Position Thanet as a global agritech hub*
- *Promoting Thanet's broader cultural/leisure offer*

¹ <https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-Local-Plan-July-2020-1-1.pdf> (accessed 6 July 2021)

² <https://www.thanet.gov.uk/wp-content/uploads/2020/04/Thanet-Local-Plan-Report-Final-22.03.20-1.pdf> (accessed 6 July 2021)

- *Cultivating the creative industries across Thanet*
- *Designing enterprise into new communities*
- *Long term feasibility modelling for Margate and Ramsgate”*

3.3. It is clear from paragraphs 6.12 - 6.27 of the TDC Local Plan, (Transport Infrastructure), as well as policies SP46 (New Railway Station) and SP47 (Strategic Routes) within this section, that the proposed development has **not** been considered within the Transport Infrastructure requirements for the period of the TDC Local Plan and is not considered a factor in the successful delivery of the Economic Growth Strategy from either an economic development or a Transport Infrastructure point of view. The only mention in the Transport Infrastructure section of the TDC Local Plan is a note in Policy SP47 (Strategic Routes) concerning the **potential negative impact and consequences** of the proposed development on the ability of proposed local Transport Infrastructure and strategic routes to provide for growth in the event that the DCO is granted, as follows:

“However, if further development is permitted, including further development at Manston Airport, which has a material impact on the capacity or operation of these [strategic] routes, the Council will require alternative on-site highway provision where appropriate and/or proportionate contributions towards any improvements or changes to the existing routes which is thereby necessitated³.”

4. South East Local Enterprise Partnership (“SELEP”)

SELEP Economic Recovery and Renewal Strategy

SELEP Economic Strategy Statement - Smarter Faster Together⁴

- 4.1. Whilst above-mentioned Economic Strategies specifically reference SELEP support for early stage DCO NSIP applications including London Resort and the Lower Thames Crossing, there is no support, dependency or mention of or for the Applicant’s proposed development of the Manston site.
- 4.2. The SELEP Economic Recovery and Renewal Strategy⁵, is based on the emerging draft SELEP Local Industrial Strategy (“LIS”), and is - in effect - an interim LIS.

³ <https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-Local-Plan-July-2020-1-1.pdf> (accessed 6 July 2021)

⁴ https://www.southeastlep.com/app/uploads/2019/03/SELEP_StratEconState_singles.pdf (accessed 6 July 2021)

⁵ https://www.southeastlep.com/app/uploads/2021/03/EconomicRecoveryandRenewalStrategy_UpdatedMar21.pdf (accessed 6 July 2021)

4.3. The SELEP Economic Recovery and Renewal Strategy covers SELEP strategy with regards to transport infrastructure support and development under Strategic Priority 2: UK's Global Gateway, (pages 15-17). This strategy outlines both the strength of the existing infrastructure in the SELEP region for freight - specifically sea freight, with *"85 million tonnes of freight moving through SELEP's ports each year"* - and its strategy for growth through transport infrastructure based on the following existing transport infrastructure in the South East:

- The region's two new Freeports - **Freeport East**, (centred around Felixstowe and Harwich ports) and **Thames Freeport**, (centred around the Global Ports at London Gateway and Tilbury)
- **Southend Airport Business Park and Innovation Centre**, supported by a £23.09m investment via the Government's Local Growth Fund
- **Stansted Airport Training Centre** and its *"pioneering tutor bursary scheme ...to recruit trainers in some of these hard to recruit skill areas such as digital, construction, engineering and logistics"*
- Continuing *"to champion significant infrastructure projects such as the Lower Thames Crossing"*.

4.4. The proposed development at Manston is even more notable in its absence in the context of this UK Global Gateway Strategic Priority for SELEP. In fact, in the context of SELEP support for Southend Airport, Stansted Airport, the Southend Airport Business Park and Stansted Airport Training Centre, the proposed development, notwithstanding questions regarding its viability, may arguably be considered as unwelcome and unnecessary competition in a relatively small geographical area.

5. Kent County Council ("**KCC**")

Strategic Delivery Plan (2020-2023)⁶

Growth Infrastructure Framework: A 2050 Picture of Kent and Medway⁷

5.1. There is no support, dependency or mention of or for the proposed development in any of the above-mentioned KCC Strategies. This includes dedicated sections in KCC's Strategic Delivery Plan ("**SDP**") on Enterprise and Investment, (pages 8-9) and Connected Transport and Communities, (pages 12-13).

⁶ https://www.kent.gov.uk/_data/assets/pdf_file/0003/93711/Strategic-Delivery-Plan-summary.pdf (accessed 6 July 2021)

⁷ https://www.kent.gov.uk/_data/assets/pdf_file/0009/79920/GIF-2050-Picture.pdf (accessed 6 July 2021)

- 5.2. KCC's Growth Infrastructure Framework ("GIF") to 2050 covers strategies and local needs to support growth throughout the county under four possible future scenarios, setting out *"different contexts in which Kent and Medway may exist, to help identify critical decision points and strategic options so that the county's infrastructure is resilient to future challenges"*. The proposed development - or any other development of the Manston Airport site for aviation use - is not mentioned in any of these four scenarios. There is no suggestion of need for any such airport infrastructure - either for passengers or freight - set out under the **transport** heading, or any other heading, in the **baseline infrastructure requirements** set out under any of the four scenarios detailed on pages 7-8, 11-12, 17-18, 23 or 28-29 of this document.
- 5.3. This is consistent with **KCC's Position Statement**⁸ on the future prospects of Manston Airport, which concluded as far back as 2015 that;
- *"the truth is that Manston has failed over a prolonged period of time to run as a commercially successful airport";* and
 - *"RiverOak has not managed to convince Thanet District Council that there is a viable business plan";* and
 - *"surely it is now time to look at a B Plan for Manston".*

6. **Conclusion**

Despite the Applicant's insistence in its Overall Summary of Need Case⁹ of the proposed development's importance with regards to potential contribution to the local and regional economy, it is clear that this view is not shared by any of the local host authorities, including Thanet District Council, Kent County Council and the South East LEP. Rather, it is telling that there is not even a mention of the proposed development - much less any dependence on it or support for it - in any current local or regional economic strategies. This includes but is not limited to those published since 9 July 2020. Indeed, it is conspicuous by its absence.

⁸ https://www.kent.gov.uk/_data/assets/pdf_file/0003/29541/Manston-Airport-position-statement.pdf (accessed 6 July 2021)

⁹

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004669-Applicant's%20Overall%20Summary%20of%20Need%20Case.pdf> (accessed 6 July 2021)