

Joint Representation of Ramsgate Coastal Community Team and Ramsgate Neighbourhood Plan Group

Re-determination of the Application by RiverOak Strategic Partners Limited ("the Applicant") for an Order granting Development Consent for the re-opening and development of Manston Airport in Kent

This is a joint submission on behalf of Ramsgate Coastal Community Team IP ref: 20014383 and on behalf of Ramsgate Neighbourhood Plan Group: IP ref 20014343. Both groups support the development of a strong mixed economy with sustainable growth in all parts of the town.

1 The extent to which current national or local policies (including any changes since 9 July 2020 such as, but not limited to, the re-instatement of the ANPS) inform the level of need for the services that the Development would provide and the benefits that would be achieved from the Development

1.1 National

Airports National Policy Statement (ANPS)

The ANPS was not in effect when the Secretary of State made his decision on Manston but was reinstated by the Supreme Court on 16 December 2021. The ANPS does not mention Manston but allows plans for the third runway at Heathrow, the preferred option, to progress. The Airports Commission reporting in 2015, had dismissed Manston because the proposal "did not fit the Commission's remit or offer a solution to the key question of providing additional long-term capacity and connectivity for the UK." Making best use of existing runways, 2018, made it clear that any proposals for other airports should take account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations."

1.2 Local

In his letter date 9 July 2020, the Secretary of State concluded that "significant economic and socio-economic benefits would flow from the Development to Thanet and East Kent as well as more widely including employment creation, education and training, leisure and tourism, benefits to general aviation and regeneration benefits."

However, the level of need for the services that the Development would provide and the benefits that would be achieved from the Development are seriously challenged by a number of new developments.

The applicant's proposal included estimates of the number of jobs - direct, indirect and catalytic - that the development might support over a twenty-year period. The Examining Authority concluded the numbers had been overstated by 19%. More recently by the Applicant's has admitted that automation would decrease the number of jobs. We would argue that even the reduced numbers are unrealistic and unachievable.

The Applicant made much of high unemployment rates in Thanet but overlooked the potential impact of a number of other factors including the provisions of Thanet District Council's Local Plan to 2031 adopted on 9 July 2021. [TDC Local Plan to 2031](#)

1.2.1 **Thanet Local Plan to 2031**

TDC has planned for a minimum of 5,000 additional jobs by 2031. This does not include RSP's projections for Manston Airport.

Extract from Policy SP04 - Economic Growth

A minimum of 5,000 additional jobs are planned for in Thanet to 2031. The aim is to accommodate inward investment in job creating development, the establishment of new businesses and expansion and diversification of existing firms.

Sufficient sites and premises suited to the needs of business are identified and safeguarded for such uses. Manston Business Park is the key location for advanced manufacturing and large scale job creating development.

Land is identified and allocated to accommodate up to 53.5ha of employment space over the period to 2031. Land and premises considered suitable for continued and future employment use will be identified and protected for such purpose. Within the urban area, and the confines of villages as defined on the Policies Map, proposals for employment generating development on non-allocated sites will be supported in principle, subject to meeting the requirements of other policies in the Plan.

Thanet's town centres are priority areas for regeneration and employment generating development, including tourism and the cultural and creative industries which will be supported.

*The growth of the Port of Ramsgate is supported as a source of employment and as an attractor of inward investment. **

* Thanet District Council submitted a bid to the Levelling Up Fund on 18 June 2021. The two main components of the bid are investment in the Port and adjacent Royal Harbour. See Section 4.

1.2.2 **Thanet Parkway Station**

Thanet Parkway Station was given planning permission in December 2020. Situated between Ramsgate and Minster stations and served by HS2, it is expected to open in 2023 and improve connectivity between East Kent, London and the wider Kent Area, including Ebbsfleet and Swanscombe.

1.3 **East and North Kent**

1.3.1 **The London Resort, Swanscombe Kent**

A DCO application was accepted in January 2021. Construction is expected to take six years, offering 2,500 -3,000 jobs, rising to over 10,000 full time jobs ten years after completion.

1.3.2 **Ebbsfleet Garden City**

This development is projected to deliver up to 30,000 jobs by completion of the final phase in 2035.

1.3.3 **The Lower Thames Crossing**

This project is funded by the DfT. An application for a DCO is due to be re-submitted later this year with construction expected to take six years and provide up to 22,000 jobs as well as supply chain training for local businesses. When complete the tunnel will provide a link to the newly announced Thames Freeport.

1.3.4 **Thames Freeport**

One of eight freeports announced in March 2021, Thames Freeport is forecasting over 25,000 jobs and significant investment in training and skills.

2 Whether the quantitative need for the Development has been affected by any changes since 9 July 2019, and if so, a description of any such changes and the impacts on the level of need from those changes (such as, but not limited to, changes in demand for air freight, changes of capacity at other airports, locational requirements for air freight and the effects of Brexit and/or Covid);

2.1 Freeports

Eight new freeports were announced in March 2021. Significantly they included Thames, East Midlands and Southampton. Thames is close to Stansted Airport, Southampton Airport has plans to expand while East Midlands Airport substantial scope for growth.

2.2 Heathrow Airport

The ANPS was re-instated in December 2020, allowing plans for a third runway at Heathrow to proceed and provide for a doubling of air freight capacity, mainly bellyhold.

2.3 Stansted

Stansted Airport successfully appealed the refusal by Uttlesford District Council to grant planning permission for development. The proposed development reduced the number of Cargo Air Transport Movements to 16,000 but this allows for a substantial increase over current CATMs.

2.4 Brexit

At the start of the year Manston operated as a lorry park to cope with short term disruption at the Port of Dover and accommodated a Covid test centre.

The UK government has been seeking trade deals with countries outside Europe but Manston is poorly located to process long distance air cargo compared to Heathrow or East Midlands and would be further disadvantaged by restrictions on night flights.

An obvious impact of Brexit has been the loss of a European workforce which has led to acute labour shortages. This has been particularly noticeable agricultural areas like Kent (including Thanet) which largely relied on migrant workers but there have been similar losses in other industries such as construction, catering and manufacturing.

2.5 Covid

Covid has demonstrated the resilience of the aviation sector and its ability to make best use of its existing capacity. The number of cargo flights increased as passenger flights dropped: airlines made use of existing slots for freight, sometimes converting

passenger planes to carry cargo - changes that can be reversed as passenger numbers increase with bellyhold replacing pure cargo

3 The extent to which the Secretary of State should, in his re-determination of the application, have regard to the sixth carbon budget (covering the years between 2033 – 2037) which will include emissions from international aviation;

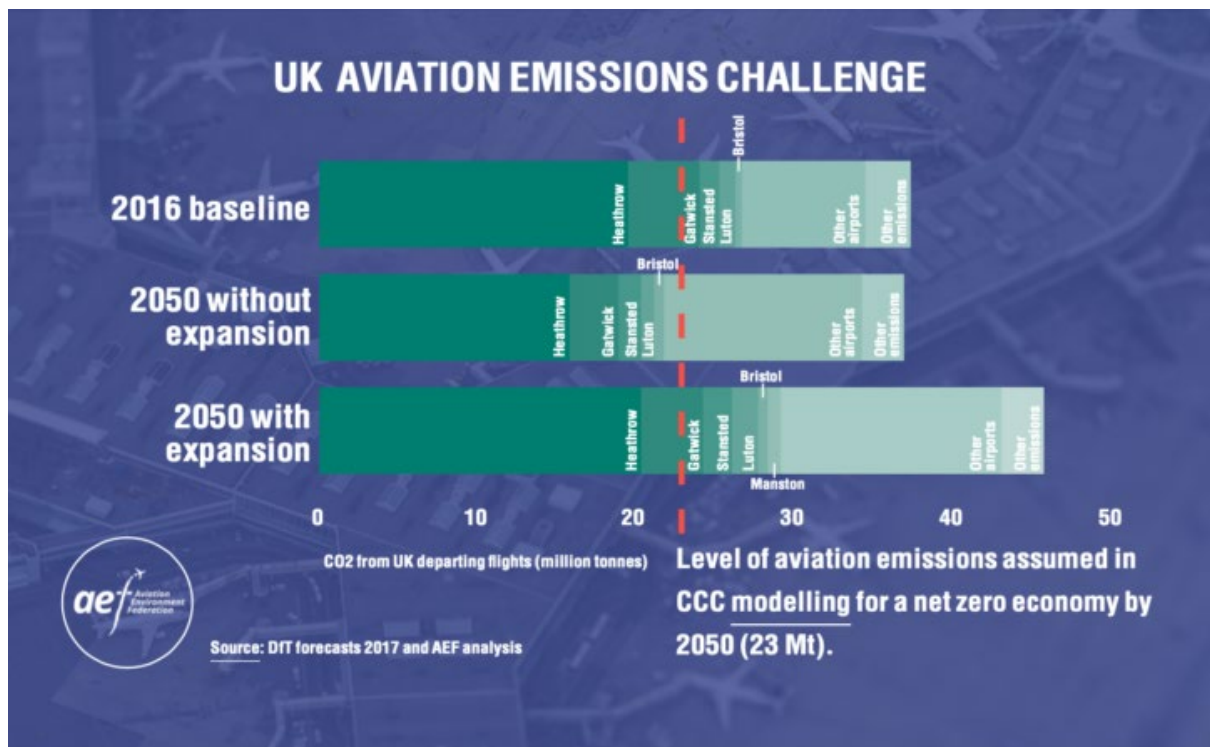
6th Carbon Budget: The Carbon Budget Order 24 June 2021

The Climate Change Committee recommended that, as a matter of priority there should be "no net expansion of UK airport capacity unless the sector is on track to outperform its net missions trajectory and can accommodate the additional demand."

According to the Aviation Environment Federation (AEF):

"Combined growth plans of UK airports will result in a 70% increase in passenger numbers on today's level. This is nearly three times the 25% growth allowed for in the Committee on Climate Change's net zero modelling.

Our analysis shows that if all airport expansions are allowed to proceed it could result in an extra 9MtCO₂ per annum by 2050 (Aviation emissions would be 36.9MtCO₂ per annum in a scenario without expansion, compared to 45.77MtCO₂ per annum in a scenario with expansion).



The proposals for Manston Airport are not to expand an existing airport but rather an attempt to reinstate a short-lived former airport with a record of failure and would be hard to justify against more viable expansion plans at existing, established airports.

4 **Any other matters arising since 9 July 2019 which Interested Parties consider are material for the Secretary of State to take into account in his re-determination of the application.**

RSP's campaign has polarised the local community. Opposition to the development is particularly marked in areas that lie under the proposed flight paths.

Ramsgate's main beach is directly under the main flight path that crosses the centre of the town and 4.14 km from the end of the runway. A re-opened airport would have a detrimental effect on the economy of the town and the health and well-being of its population. Since the airport closed, more people are in employment and, in spite of a general decline common to high streets across the country, new independent businesses have opened, even during the pandemic.

A successful bid to the Future High Street Fund will see improvements to road crossing that separates the town from its Historic Royal Harbour and Main Sands, facilitating pedestrian flow and supporting local businesses.

The town is home to around 45,000 people, one of the first Heritage Action Zones (HAZ) and now a High Street Heritage Action Zone. Since 2017, Historic England's HAZ programme has explored and recorded the town's historic built environment. Now, consultants are about to be appointed to manage the final stage of the programme. This will be a major consultation exercise to understand perceptions of Ramsgate's seafront, inform its future management, and lay the ground work for future funding bids. Historic England has also agreed to fund research into training and skills needs in the area.

In June 2021, Thanet District Council submitted a bid to the Levelling Up Fund. TDC describes the two main components of the bid as:

- **The Port.** Investment in Port Infrastructure will create a Green Port which will provide a hub for innovation and training, allied to a modern hybrid Port, supporting renewable energy and zero carbon maritime logistics. Investing jointly with the private sector we will create a Green Campus including a Centre of Excellence for offshore operations and maintenance, space for innovation in low carbon logistics and a hub for green business. This investment will unlock the opportunity to provide real economic growth, job creation and training places in the heart of Ramsgate.
- **The Royal Harbour.** We are seeking investment to link buildings within the harbour area to develop new and distinctive visitor assets that will provide important new training and employment pathways for residents. A new boutique hotel and a high-end restaurant and a brasserie will provide meaningful apprenticeships and in work training in hospitality. These will be accompanied by vital investment in quayside fishing facilities to enable the local fleet to store and sell their catch, as well as providing new fishing and maritime jobs and training to support the growth and resilience of the town's fishing community. New public realm adjacent to a refurbished clocktower will create a new town square, as well as connecting projects and reducing congestion within the centre. and first stage activity as part of wider career development. This will include training kitchens, community teaching space,

opportunities for intermediate labour markets and information exchange, as well as space for existing local charities to operate out of.

Independent consultants were commissioned to prepare this Ramsgate Future Levelling Up Fund bid, and to develop a wider and longer-term Investment Plan for the town.

People are moving into the area and investing in the restoration of the once neglected Georgian, Victorian and Edwardian buildings at the heart of the town. The long-delayed development of 100 luxury seafront apartments is nearing completion and smaller sites are being snapped up for residential development. There is a growing but fragile feeling of optimism.

July 2021