

Thank you for inviting me to comment on your intention to remake your decision regarding RSP's application for a DCO regarding their intended freight hub at Manston.

It is not my intention to comment on the technical issues involved except to say that my understanding of the DCO process is that the applicant must show unequivocally a "need" for the proposed facility. Clearly in this case the expert planning inspectors, after an extensive investigation over 3 years and over 2000 submissions, found that this case had not been made.

Your attempt to negate this finding and allow the DCO was found wanting by the high court at Judicial Review. I would like to point out that for the public, raising the finance to employ a legal team and fight a Judicial Review is no trivial matter for residents to sustain. Over £100k was raised in a few weeks., which shows the strength of local feeling.

I would like you to take account of the reasons for this strength of feeling.

Manston was a 2nd World War airfield, housed an American airfield immediately after the war and became a civilian airfield under licence. It has never received planning permission as an airfield. Because of this, local people have never been able to examine the economic, environmental, and social case for and against an airport in this location.

Several operators have attempted to run an airport from this site over the intermediate years. All have failed, despite public subsidy by KCC and others, losing the owner's large amounts of money. The airport closed 7 years ago following its failure under the management of one of the current DCO applicants, and subsequent sale by Infratil. The inescapable problem with the site is its location, surrounded on three sides by sea, fish do not need airplanes.

Because of this chequered history, residents, particularly the 40,000 Ramsgate residents have suffered the blight of living under the flight path for no real gain. The history is one of constant promises of jobs that never materialise. Manston has never employed more than 70 direct full-time employees. Because of the economic difficulties encountered, the various management teams have proposed increasing amounts of night-time flying. Permission has been refused following a professional study by MORI that showed public opinion heavily against but living with the threat has been there. This blight continues even though the airport is closed.

The topography of the relationship between the airport and Ramsgate, assuming the normal 3-degree angle of glide path when landing, has meant the Town suffers overflying between 850 ft at the coast to 239 ft at the edge of the town, just 1k from the end of the runway. When previously in operation, weather conditions meant that between 70 and 80% of landings were over the town, regularly generating over 100 decibels at the local grammar school in the centre of the town. Classroom lessons stopped whilst planes flew over.

The last Masterplan done for Manston in 2010 acknowledged that its PSZ should have been done in 2006. It was not. But by looking at other airports and knowing the pattern of aircraft take off and landings at Manston it is possible to gauge the likely shape of the PSZ that would affect Ramsgate.

The 1 in 10,000 contour would most likely be a triangle extending a 1-1.5 km beyond the end of the runway. The 1 in 100,000 contour, and thus the PSZ, would extend approximately 3.5-4km from the end of the runway. It would cover a substantial area of Ramsgate right down to the harbour and

including part of the town centre. Three schools, Clarendon House Grammar School, Christ Church Primary School and Ellington Infant School, are within the 1 in 100,000 risk contour.

The 1 in 10,000 risk contour would include several residential streets including Kirkstone, Whinfell, Drybeck, Kentmere avenues and part of Windemere Avenue. “The Secretary of State wishes to see the emptying of all occupied residential properties, and of all commercial and industrial properties occupied as normal all-day workplaces, within the 1 in 10,000 individual risk contour.” These residents would need to be moved.

The individuals fronting RSP in their DCO application have a history of failed attempts to asset strip failing airports in Europe. They made two attempts to persuade Thanet District Council to CPO the site on their behalf. Two separate administrations rejected the proposal due to expert opinion agreeing that there was not a viable business plan and RSP could not show a verifiable source of funding. We would draw the attention of the SoS that PINS ruled that neither of these matters could be part of the DCO examination. We would recommend that these two aspects should be part of any new examination. The change in RSP’s plans from a minor regional airfield to a major national freight hub is purely opportunistic in response to two rejections of their plans by aviation experts.

The PINS examination recognized that RSP’s plans would damage Ramsgate’s historic buildings, recently recognized by English Heritage declaring a Heritage Action Zone, would be detrimental to resident’s health due to noise and pollution from CO, NO2 and particulates, and would severely damage Ramsgate’s visitor economy which prior to the pandemic was booming.

It is for these reasons, that I believe PINS was correct in ruling that the overwhelming case for national “need” was not established, and certainly did not merit the damage it would cause locally.

We also feel that we have now lived with no airport on this site for seven years with only beneficial effects locally and no obvious detriment nationally. Airports across the country are struggling to recover market share and at the same time justify their use of the country’s precious carbon budget.

It’s time for the SoS to end the blight on Ramsgate and reject the DCO application.