

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

Date: 19 November 2021
Our Ref: SoS/R/019

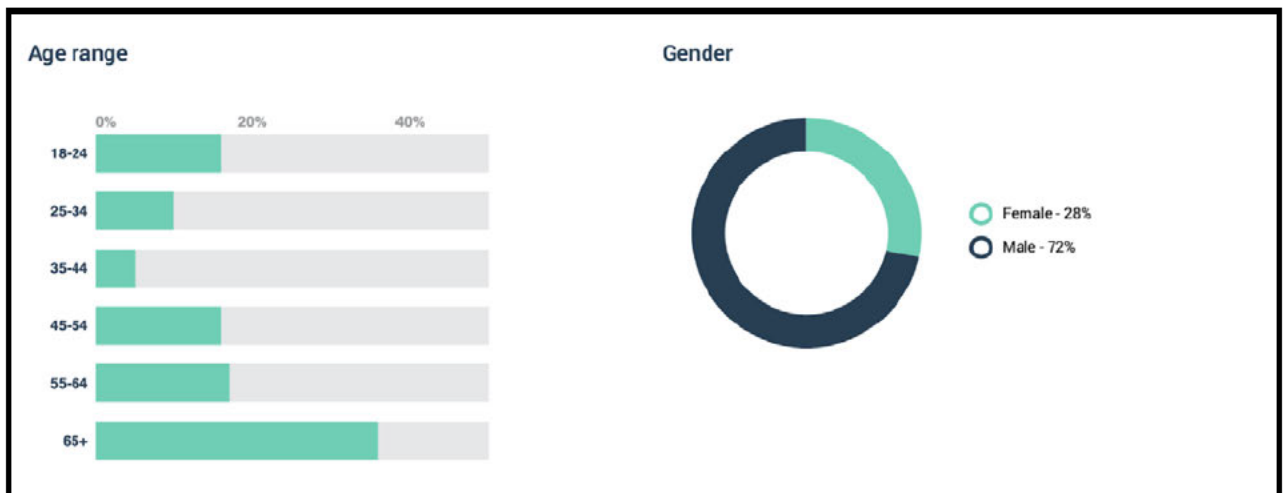
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For the attention of the Manston Airport Case Team

- A. This submission is in response to the SoSFT's letter of 21 October 2021 and specifically paragraph 6.
- B. We submit our comment to the First Round of Consultation herewith as a formal consultation response to the Second Round of Consultation.
- C. Our comment is in response to submissions Andrew Wilson [[TR020002-005603](#)]; Angela Stevens [[TR020002-005657](#)]; Ann Smith [[TR020003-005622](#)]; Antoinette Girdler [[TR020002-005739](#)]; Bryan Girdler [[TR020002-005731](#)]; Carole Copeland [[TR020002-005487](#)]; Cherry Walker [[TR020002-005658](#)]; David Stevens [[TR020002-005730](#)]; Gillian Emans and Dennis Flint [[TR020002-005593](#)]; Greg Nocentini [[DfT Manston 1](#)]; Jackie Datlen [[TR020002-005431](#)]; John Bates [[TR020002-005609](#)]; John Copeland [[TR020002-005481](#)]; Dr John Pritchard [[TR0200002-005747](#)]; Keith Nicholls [[TR020002-005507](#)]; Kent Needs Manston Airport [[TR020002-005587](#)]; Dr Beau Webber [[TR020002-005826](#)]; Lesley Robertson [[TR020002-005805](#)]; Linda James [[TR020002-005412](#)]; Michael Redmond [[TR020002-005615](#)]; Mike J [[TR020002-005454](#)]; Mike Skerratt [[TR020002-005516](#)]; Mr and Mrs Michael and Christine Redmond [[TR020002-005608](#)]; Prof Michael Grantham [[TR020002-005539](#)]; Nick Toy [[TR020002-005411](#)]; Paul Howard [[TR020002-0057112](#)]; Peter Quaintmere [[TR020002-005764](#)]; Save Manston Airport (“**SMAa**”) Matter 2 Parts 3 and 4 [[TR020002-005823](#)]; Dr Beau Webber [[TR020002-005466](#)]; Dr Beau Webber [[TR020002-005466](#)]; SMAa Matter 2

Part 1 and 2 [TR020002-005824]; SMAa matter 1 [TR020002-005821]; SMAa matter 4 [TR020002-005823]; Terence Huckstep [TR020002-005382]; Tina Brown [TR020002-005620]; and Winbourne Martin French [TR020002-005779] (together the “**A-W Submissions**”)

D. In response to the A-W Submissions comments on Local Support, we respectfully refer to the submissions to the First Consultation specifically: [Cllr Tricia Austin](#); [Kent County Councillor Karen Constantine](#); [Cllr Becky Wing](#); [Cllr Anne Marie Nixey](#), [Cllr Trevor Roper](#); [Guildford Lawn Residents Against the DCO](#); [Nethercourt Action Group](#); [Liverpool Lawn & Adelaide Gardens Residents Associations](#); [No Night Flights](#); [Ramsgate Coastal Community Team & Ramsgate Neighbourhood Group](#); [Ramsgate Town Council](#); [Ramsgate Town team](#); and [The Ramsgate Society](#). In addition, the number of submissions against the DCO and supported with evidence was more than double that of those for it in the First Consultation held earlier this year. Further, the Crowdfjustice page set up by Jenny Dawes has reached over £110,000¹. The breakdown of contributors highlights that the working age demographic of 18-64 are the majority of supporters against the DCO and for a judicial review (if the DCO is granted) and that there is intergenerational support against the DCO and for a judicial review (if the DCO is granted)².



¹ <https://www.crowdfjustice.com/case/support-judicial-review-of-man/> (accessed 19 November 2021)

² Supplied on request by Jenny Dawes on 8 November 2021

- E. **In response to the A-W Submissions comments on Need**, we respectfully refer to the submissions of Jenny Dawes [[TR020002-005743](#)] and Ramsgate Town Council [[TR020002-005680](#)] and their subsequent submissions to the 2nd Consultation. Further, we refer to Conclusion 6 of the [Independent Aviation Assessor](#) Report. We also refer to the Submission to the Second Round of Consultation by the Nethercourt Action Group of its Independent Aviation Expert's report in response to representations made to the First Round of Consultation. In addition, we respectfully refer to our submissions to the Second Consultation specifically:
- a. SoS/R/011 and specifically pages 1 and 16; and
 - b. SoS/R/012 and specifically pages 5, 10-11; and
 - c. SoS/R/015 and specifically pages 1-2
- F. **In response to the A-W Submissions comments on Financing we respectfully** refer to our submissions to the Second Consultation specifically:
- a. SoS/R/005 at Pages 3-7; and
 - b. SoS/R/030
- G. **In response to the A-W Submissions comments on the Thanet District Council Local Plan** we respectfully refer to our submissions to the Second Consultation specifically:
- a. SoS/R/012 and specifically pages 4, 28-48; and
 - b. SoS/R/020; and
 - c. SoS/R/030
- H. **In response to the A-W Submissions comments on Aviation Policy** we respectfully refer to our Submission to the First Round of Consultation at [[SoS/R/010](#)] and we respectfully refer to the submissions of Jenny Dawes [[TR020002-005743](#)] and Ramsgate Town Council [[TR020002-005680](#)] and their subsequent submissions to the 2nd Consultation. Further, we refer to the [Independent Aviation Assessor](#). We also refer to the Submission to the Second Round of Consultation by the Nethercourt Action Group of its Independent

Aviation Expert's report in response to representations made to the First Round of Consultation. In addition, we respectfully refer to our submissions to the Second Consultation specifically:

- a. SoS/R/011 and specifically pages 1-5; and
- b. SoS/R/012 and specifically pages 5-7; and
- c. SoS/R/015 and specifically pages 1-2

I. **In response to the A-W Submissions comments on Skills we respectfully refer to** our submissions to the Second Consultation specifically:

- a. SoS/R/012 and specifically pages 16-19; and 44-45; and 48-49; and
- b. SoS/R/020; and
- c. SoS/R/030

J. **In response to the A-W Submissions comments on Deprivation we respectfully** refer to our submissions to the Second Consultation specifically:

- a. SoS/R/018 and specifically pages 4-5; and
- b. SoS/R/020.

K. **In response to the A-W Submissions comments on Unemployment and Employment levels** we refer to our submissions to the Second Consultation specifically:

- a. SoS/R/012 and specifically pages 13-14; and
- b. SoS/R/020

L. **In response to the A-W Submissions comments on Jobs we refer to our** submissions to the Second Consultation specifically:

- a. SoS/R/011 and specifically pages 5 and 6; and
- b. SoS/R/012 and specifically pages 14-16; and 44-45; and and 47-49; and
- c. SoS/R/013 and specifically pages 1-2; and
- d. Paragraph Q below.

M. **In response to the A-W Submissions comments on Life Expectancy** we refer to

our submissions to the Second Consultation specifically:

- a. SoS/R/018 and specifically pages 4-5; and
- b. SoS/R/020

N. **In response to the A-W Submissions comments on the Thanet Parkway Station**

we refer to our submissions to the Second Consultation specifically:

- a. SoS/R/012 and specifically pages 21-25

O. **In response to the A-W Submissions comments on Electric Barges** we refer to

our submissions to the Second Consultation specifically:

- a. SoS/R/012 and specifically pages 25-28

P. **In response to the A-W Submissions comments on Tourism we respectfully refer**

to our submissions to the Second Consultation specifically:

- a. SoS/R/012 and specifically pages 9-10; 31; and 42-44

Q. **In response to specific comments made by:**

- a. **Terence Huckstep [TR020002-005382]** states that Ramsgate Town Council is *“not reflective of the electorate of Ramsgate as at least 10 members of the council hold anti-airport views and senior council members front social media anti-airport groups”*. We respectfully remind the Secretary of State that these members of Ramsgate Town Council campaigned on an “anti-airport” ticket and were elected democratically by the people of Ramsgate.
- b. **Terence Huckstep [TR020002-005382]** states that he has gone through the *“first 10 pages of the Indeed job vacancy website as recommended by DWP and the only jobs on offer for Ramsgate were mostly part time zero hours contracts in hospitality as bar person, chamber person and barista. There was not one job opportunity to train for a trade or that offered the prospect of job stability for the future³”*.
 - i. These statements are simply not true.

³ Page 2 Para 2 Terence Huckstep [TR020002-005382]

ii. As of today's date on the Indeed website and with a search for "Ramsgate" jobs within a 25 miles search there are 3,347 jobs⁴.

1. As of today's date on the Indeed website and with a search for "Ramsgate" jobs by way of example there are on the first 2 pages the following jobs⁵:

- a. Production assistant - Haekels
- b. Front of House assistant - The Falstaff Hotel
- c. Trainee Conductor - Southeastern Railway
- d. Phlebotomist - East Kent Hospitals University NHS
- e. Counter Fraud, Compliance and Debt AO Administrative - DWP
- f. Information and Advice Officer - Age UK Thanet
- g. Store/ Customer Assistant - Aldi, WHSmith, Lidl, WM Morrisons, Iceland, Superdrug, USC, Sports Direct,
- h. Team Member Reception, Housekeeping - Premier Inn
- i. Student Progression mentor - EKC group
- j. Service Desk Coordinator - Blaze Maintenance Ltd
- k. Production Packer - Buy WHole Food Online
- l. Server/ Waiter/ kitchen Porter - Bella Italia Broadstairs, Brewers Fayre
- m. Escape Room Gamesmaster - the Counting House
- n. HR Advisor - East Cliff Practice

iii. As of today's date on the Find A job DWP website⁶ there are 119 jobs with a search for "Ramsgate" jobs by way of example there are on the first 2 pages the following jobs:

- a. Fetal Monitoring Midwife - East Kent Hospitals University NHS

⁴ <https://uk.indeed.com/jobs?q=&l=Ramsgate%2C+Kent> Indeed Website (accessed 19 November 2021)

⁵ *Ibid*

⁶ <https://findajob.dwp.gov.uk/search?loc=71093&p=1> (accessed 19 november 2021)

- b. Live in Carer - Good Care Group
- c. Ward Clerk - East Kent Hospitals University NHS
- d. Primary Teacher
- e. Digital Marketing Specialist - HR Go recruitment
- f. Community Support Worker - Hilton Nursing Partners
- g. Cleaning Operative - NIC Services Group Ltd
- h. Assistant Site Manager - Randstad CPE
- i. Customer service assistant - Wilko Retail
- j. Mobile Funeral Service Arranger - Dignity
- k. Senior Psychotherapist/ Clinical/ Counselling Psychologist - Kent and Medway NHS and Social Care Partnership Trust
- l. Dumper Driver - Danny Sullican & Sons Ltd
- m. Kickstart - Artist Administrative Assistant and Researcher - DWP Kickstart Scheme
- n. Lactation Consultant - NHS Jobs
- o. Community Mental Health Practitioner - NHS Jobs
- p. Band 5 Community Nurse - NHS Jobs
- q. Halifax customer Advisor - Lloyds Banking Group

iv. As of today's date on the Find A job DWP website⁷ there are 7,381 jobs with a search for "Kent" jobs.

v. We respectfully remind the Secretary of State that the Applicant has defined local labour as those living within a 90-minute commute of the Proposed Development, this is based on research by the Impact Assessment Unit at Oxford Brookes University which defined home-based workers as living within a 90-minute commute zone⁸. This would extend the Local Area to London and

██ (accessed 19 november 2021)

⁸ Page 34 [TR020002-004664]
[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004664-Updated%20Register%20of%20Environmental%20Actions%20and%20Commitments%20\(tracked\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004664-Updated%20Register%20of%20Environmental%20Actions%20and%20Commitments%20(tracked).pdf) (accessed on 17 November 2021)

to the South East LEP (Essex⁹ or East Sussex¹⁰ or even Stansted Airport¹¹). This would greatly increase the number of job vacancies.

- c. We note that the conference referred to by **Prof Michael Grantham** [[TR020002-005539](#)] is in Leeds at the Hilton Hotel.

- d. **Mr and Mrs Michael and Christine Redmond** [[TR020002-005608](#)] state that "...[Thanet] has the highest rate of suicide in this country amongst 16- 24 year olds". Mr and Mrs Michael and Christine Redmond provide no evidence to back up this assertion. We can find no evidence whatsoever in the ONS records to support this statement¹².

- e. **SMAa matter 4** [[TR020002-005823](#)] states that "new evidence has emerged to suggest that Louise Congdon does not have the necessary qualifications to act as an expert witness regarding forecasting¹³". This is

⁹

[REDACTED] (accessed 17 November 2021)

¹⁰

[REDACTED] (accessed 17 November 2021)

¹¹

<https://duckduckgo.com/?q=get+directions&ia=directions&iaxm=directions&start=what%3AManston%252>
[REDACTED] (accessed 17 November 2021)

¹² Suicide in England and Wales: 2020 registrations Available online at:

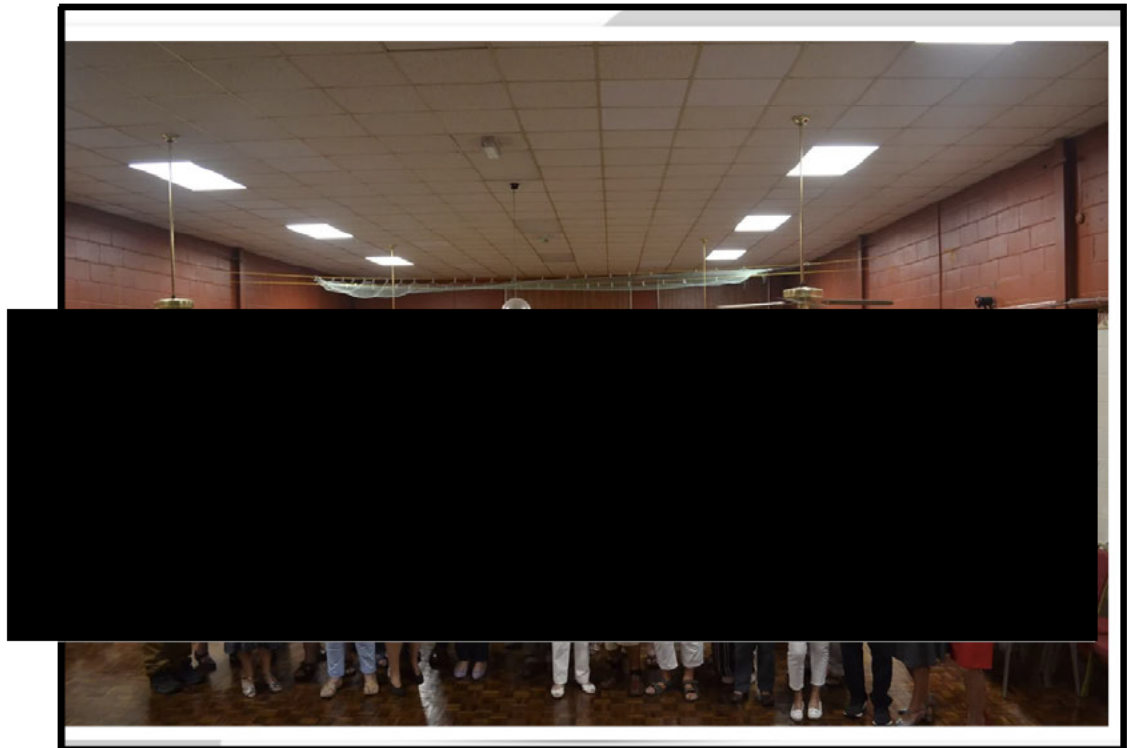
[REDACTED] (accessed 19 November 2021)

¹³ Labelled Page 1

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005823-SMAa%20matter%204.pdf> (accessed 19 November 2021)

simply not true¹⁴. SMAa has chosen to attack a woman's professional credibility rather than gain an understanding of the rules of giving expert evidence.

- f. **Save Manston Airport (“SMAa”) Matter 2 Parts 3 and 4 [TR02002-005823], SMAa 3 [TR020002-005822], SMAa Matter 2 Part 1 and 2 [TR020002-005824] , SMAa matter 1 [TR020002-005821]; and SMAa matter 4 [TR020002-005823]** states that it has a membership of 3700 members. We can find no evidence whatsoever to support this statement. There is a photograph on its website¹⁵ celebrating the granting of the DCO (now quashed) shown below. There are less than 40 people celebrating in this photo.



¹⁴ Louise Congdon York Aviation LLP [\[redacted\]](#) (accessed 19 November 2021)

¹⁵ [\[redacted\]](#) (accessed 19 November 2021)

g. **Dr Beau Webber** [[TR020002-005466](#)] states that SMAa currently has over 3600 total Facebook members plus an overlapping 1000 email membership. This does not mean that 1) SMAa has over 3700 members; neither does it mean 2) *“all are in full support of the DCO¹⁶”*. Joining a Facebook group or an email mailing list does not mean that you are in full support. It merely means you would like to hear news from or perhaps monitor SMAa.

¹⁶ Page 5, Para 1

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005466-Dr%20Beau%20Webber.pdf> (accessed 19 November 2021)