

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

Date: 25 November 2021
Our Ref: SoS/R/022

Email: manstonairport@planninginspectorate.gov.uk

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 the Applicant's submission [\[TR020002-005769\]](#) at Page 9, Paragraph 15 in which the Applicant makes an inaccurate and wilfully misleading statement to the Secretary of State that: *"Additionally, there is now scope for freight to also be transferred by rail from the new Thanet Parkway station [TPTS]¹".*
- D. Since the 1st round of Consultation the Applicant - Tony Freudmann - has recently given an interview to local radio station Academy FM in which Tony floats the idea that it is now Ramsgate Train Station ("**RTS**") not TPTS that could be a *"handling hub for rail freight"*².
- E. We address and rebut with evidence both of these new ideas of the Applicant in this submission.
- F. We respectfully say that it is disappointing that the Applicant has not looked at

¹ Page 9, para 15, line 3

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005769-Applicant's%20Submission%20for%20the%20re-determination%20of%20the%20Manston%20Application.pdf> (accessed 24 November 2021)

² Interview between Tony Freudmann and Academy FM at 12:45 [REDACTED] (accessed 24 November 2021)

the Kent Area Route Study, which underpins the Kent Rail Strategy 2021-2031³, which clearly sets out the existing series of freight routes and terminals serving Kent. There are a small number of approved rail freight routes in Kent; **none** of the approved rail freight routes are anywhere near the Proposed Development and/or TPTS and/or RTS. Therefore it is simply not possible to carry freight by rail to or from the Proposed Development and/or TPTS and/or RTS.

Passenger Station Only : Thanet Parkway Train Station

- G. As you will be aware, using the new Thanet Parkway station for rail freight was a new idea floated out by the Applicant at the 1st round of Consultation this year without supporting evidence.
- H. For the avoidance of any doubt, this was not part of the Applicant's DCO Application, nor part of its Environmental Statement [APP-033], [APP-034], [APP-035], [APP-036] nor part of its Transport Assessment [APP-060], [APP-061] and therefore was not examined by the ExA.
- I. In our submission to the 1st round Consultation at [SoS/R/006] specifically at paragraphs 11-16 we evidence that the Proposed Development is not near a Strategic Rail Freight Interchange ("SRFI"), there are no plans to develop a SRFI within the 30 year lifespan of the Transport strategy for the South East⁴ or the 10 year lifespan of the Kent Rail Strategy⁵ near the Proposed Development.
- J. Further, we provided evidence of the location of rail freight routes in East Kent⁶ (the area the Proposed Development is located) which are nowhere near the Proposed Development.
- K. In our submission to the 2nd round Consultation known as SoS/R/012 specifically Pages 21-25 Paragraphs W and X we evidence that the station known as Thanet Parkway Train Station is a passenger route and station and

³ Pages 50-54 Chapter 10 Rail Freight Services in Kent, Kent Rail Strategy 2021 Available online at: [REDACTED] November 2021)

⁴ Transport for South East, Transport Strategy for the South East, June 2020. Available online at: [REDACTED] (accessed 24 November 2021)

⁵ [REDACTED] (accessed 24 November 2021)

⁶ Page 51 [REDACTED] (accessed 24 November 2021)

simply cannot be used for rail freight.

- L. In a recent radio interview, the Applicant - Tony Freudmann - floated out the idea of now using the existing Ramsgate Train Station (“RTS”) as a “*handling hub for rail freight*”⁷.
- M. Again, this is a new idea and just floated out to the public. For the avoidance of any doubt, again this was not part of the Applicant’s DCO Application, nor part of its Environmental Statement [APP-033], [APP-034], [APP-035], [APP-036] nor part of its Transport Assessment [APP-060], [APP-061] and therefore was not examined by the ExA.
- N. We evidence below that the station known as Ramsgate Train Station is a passenger route and station and simply cannot be used for rail freight.

Location: Ramsgate Train Station (“RTS”)

- O. RTS is situated in a built-up residential area and is an 11 minute car ride⁸ from the Proposed Development. Any increase in vehicle trips for journeys from or to Ramsgate train station will also lead to increased traffic problems within this residential area, adding to noise and air pollution. The High Street St Lawrence is already designated as an Air Quality Management Area with NOx emissions above the health-based annual mean standard⁹.
- P. RTS is a Grade 2 listed building¹⁰ and is not owned by the Applicant, nor does the applicant own any land around the station or in the nearby vicinity.

No Land or Prospect of Land for SRFI or Freight Terminal Near RTS

- Q. The Thanet Parkway Railway Station Alternative Options concluded that there was an unavailability of land to provide even an additional car park at Ramsgate Train Station¹¹. Therefore, the idea of facilities for a freight terminal or a SRFI is

⁷ Interview between Tony Freudmann and Academy FM at 12:45 [REDACTED] (accessed 24 November 2021)

⁸ Source Google maps

⁹ Please see [REDACTED] (accessed 25 November 2021)

¹⁰ [REDACTED] (accessed 24 November 2021)

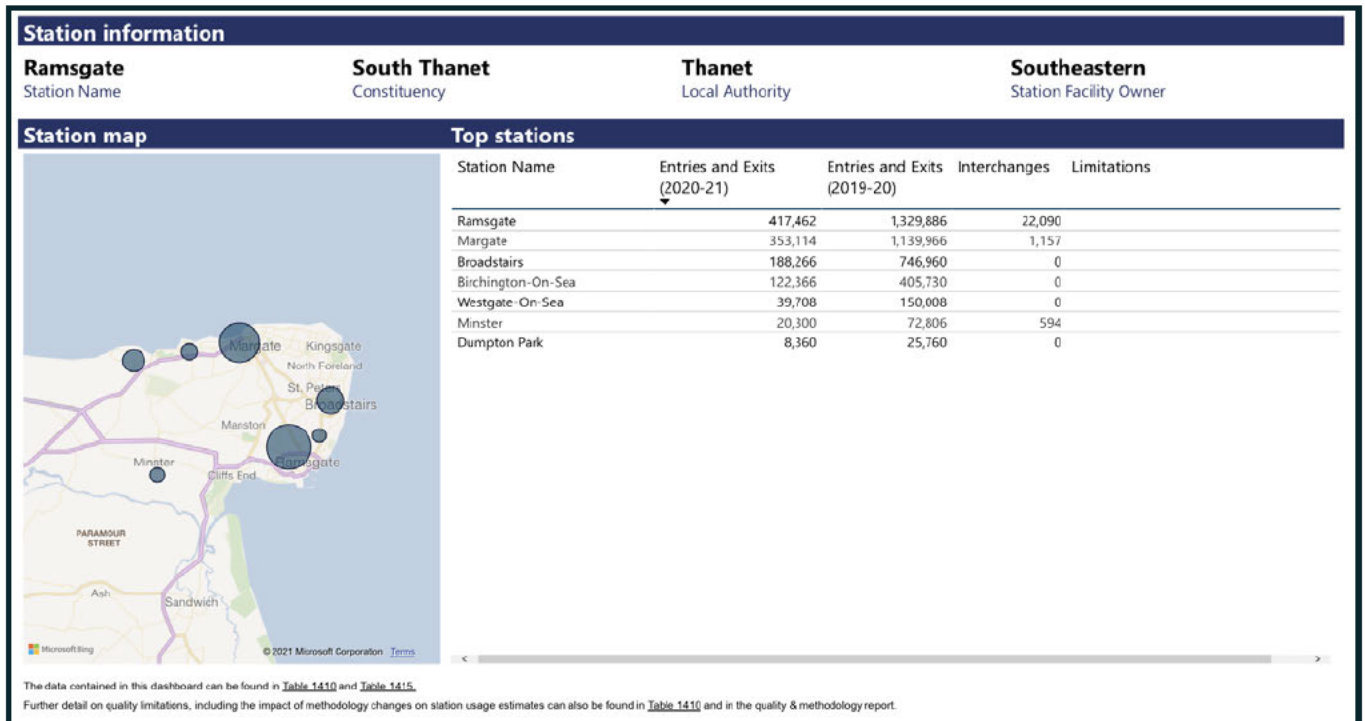
¹¹ Page 28, Thanet Parkway Railway Station Alternative Options Analysis Report July 2014 Available online at:

[REDACTED] (accessed 24 November 2021). It is of note that since the Thanet Parkway Railway Station

completely irrational.

Ramsgate Train Station : Vital to Visitor Economy

- R. Ramsgate Train Station (“RTS”) is a well-used passenger railway station used by visitors.
- S. Even during the pandemic, Ramsgate Train Station was and is the busiest passenger station in Thanet¹². This is shown in the table below.



- T. During the 2021 summer period, train travel to Thanet increased by 71% during the peak season as the demand for a UK staycation at the coast remained strong

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Alternative Options Analysis Report, the Ramsgate Fire and Rescue service has relocated to Newington Road near to Warre Recreation Ground access. It opened on 7 January 2019. The Ramsgate Fire and Rescue service supports 22 full-time and 14 on-call firefighters as well as an operational fire station and training facility for firefighters across the county, it’s a hub for partnership working with agencies such as Kent Police and South East Coast Ambulance Service, and home to the British Red Cross This is a further significant and substantial barrier.

¹² Annual estimates of the number of entries/exits and interchanges at each station in Great Britain. These estimates are based primarily on ticket sales and are produced by [redacted] on behalf of ORR. Available online at: [https://\[redacted\]](https://[redacted]) (24 November 2021)

¹³ [redacted]
(accessed 17 November 2021)

- U. Thanet's visitor economy was valued at £352 million, after welcoming 4.6 million visitors in 2019. The number of tourism jobs across the district showed a 9% increase between 2017 and 2019, to 8,664, accounting for 20% of Thanet's total employment in 2020¹⁴.
- V. RTS is a crucial part of the visitor economy's infrastructure and supports sustainable travel.

Ramsgate Train Station : Vital to Local Economy

- W. RTS is a well-used passenger railway station used by commuters and students.
- X. The construction, delivery and successful operation of the HS1 rail infrastructure has been an outstanding success for Kent. It has transformed the economy of East Kent (Ramsgate is located in East Kent), opening out a wide range of employment opportunities in Central London for Thanet residents which were previously inaccessible, widening opportunities for higher education students to access university colleges in the capital, and growing the tourism and leisure industry in the county by contributing to the 65 million annual visitors to the Garden of England [source: Visit Kent, 2020]¹⁵.
- Y. The Proposed Service Specifications for Ramsgate shown below during peak periods highlight the importance of RTS to commuters and students¹⁶. These trains travel through Ashford, the location of the HS1 and are known as the "fast train".

¹⁴ [REDACTED]
(accessed 17 November 2021)

¹⁵ [REDACTED] (accessed 25 November 2021)

¹⁶ [REDACTED] (accessed 25 November 2021)

| Trains per hour (tph) | Peak Periods (Peak direction) | | | | | Off-Peak periods | | | | |
|----------------------------|----------------------------------|-----------|------------|-----------|----------|------------------|-----------|------------|-----------|----------|
| | Terminus / Via: | Charing X | Waterloo E | Cannon St | London B | Victoria | Charing X | Waterloo E | Cannon St | London B |
| Departure Station | | | | | | | | | | |
| Sandling | 2 | 2 | 1 | 3 | | 2 | 2 | | 2 | |
| Folkestone West | 2 | 2 | 1 | 3 | | 2 | 2 | | 2 | |
| Folkestone Central | 2 | 2 | 1 | 3 | | 2 | 2 | | 2 | |
| Dover Priory | 2 | 2 | 1 | 3 | | 2 | 2 | | 2 | |
| Martin Mill | 2 | 2 | 1 | 3 | | 1 | 1 | | 1 | |
| Walmer | 2 | 2 | 1 | 3 | | 1 | 1 | | 1 | |
| Deal | 2 | 2 | 1 | 3 | | 1 | 1 | | 1 | |
| Sandwich | 2 | 2 | 1 | 3 | | 1 | 1 | | 1 | |
| Thanet Parkway ^ | 2 | 2 | 1 | 3 | | 3 | 3 | | 3 | |
| Ramsgate (via Ashford) | 2 | 2 | 1 | 3 | | 3 | 3 | | 3 | |
| Dumpton Park (via Ashford) | | | | | | | | | | |
| Broadstairs (via Ashford) | | | | | | | | | | |
| Margate (via Ashford) | | | | | | | | | | |

- Z. The Proposed Service Specifications for Ramsgate shown below during peak periods highlight the importance of the station to commuters and students¹⁷. These trains travel through Chatham and are known as the “slow train”.

¹⁷ [redacted] (accessed 25 November 2021)

| Trains per hour (tph) | Peak Periods (Peak direction) | | | | Off-Peak periods | | | | |
|----------------------------|----------------------------------|----------|-----------|-----------|------------------|----------|-----------|-----------|-------------|
| | Terminus / Via: | Victoria | Cannon St | Bromley S | Blackfriars | Victoria | Cannon St | Bromley S | Blackfriars |
| Departure Station | | | | | | | | | |
| Chestfield | 2 | 2 | 2 | | 1 | | 1 | | |
| Herne Bay | 2 | 3 | 2 | | 1 | | 1 | | |
| Birchington | 2 | 3 | 2 | | 1 | | 1 | | |
| Westgate | 2 | 2 | 2 | | 1 | | 1 | | |
| Margate (via Chatham) | 2 | 3 | 2 | | 1 | | 1 | | |
| Broadstairs (via Chatham) | 2 | 3 | 2 | | 1 | | 1 | | |
| Dumpton Park (via Chatham) | 2 | 2 | 2 | | 1 | | 1 | | |
| Ramsgate (via Chatham) | 2 | 3 | 2 | | 1 | | 1 | | |
| Selling | 2 | | 2 | | 2 | | 2 | | |
| Canterbury East | 2 | | 2 | | 2 | | 2 | | |
| Bekesbourne | 2 | | 2 | | 2 | | 2 | | |
| Adisham | 2 | | 2 | | 2 | | 2 | | |
| Aylesham | 2 | | 2 | | 2 | | 2 | | |
| Snowdown | 2 | | 2 | | 2 | | 2 | | |
| Shepherds Well | 2 | | 2 | | 2 | | 2 | | |
| Kearsney | 2 | | 2 | | 2 | | 2 | | |
| Dover Priory (via Chatham) | 2 | | 2 | | 2 | | 2 | | |

AA. RTS is a crucial part of the local - commuter and student - economy's infrastructure and supports sustainable travel.

Rail Freight Services in Kent

BB. The Kent Rail Strategy has identified that there are three principal issues which mitigate any significant further modal shift without either considerable expenditure on re-building railway infrastructure, or a substantial increase in the use of HS1 by rail freight trains: - there is overwhelming demand for paths on Mainline routes in Kent to be prioritised for passenger services, especially during peak periods but increasingly during off-peak periods as well; - there is only a limited number of routes in Kent currently cleared to WR8 gauge for freight operation on Mainline routes, with some combination of alternative routes available; - the higher Continental gauge container wagons, demand for the use of which is increasing, require clearance to WR12 gauge and paths for

this gauge of train can only be allocated on HS1¹⁸.

Rail Freight Routes

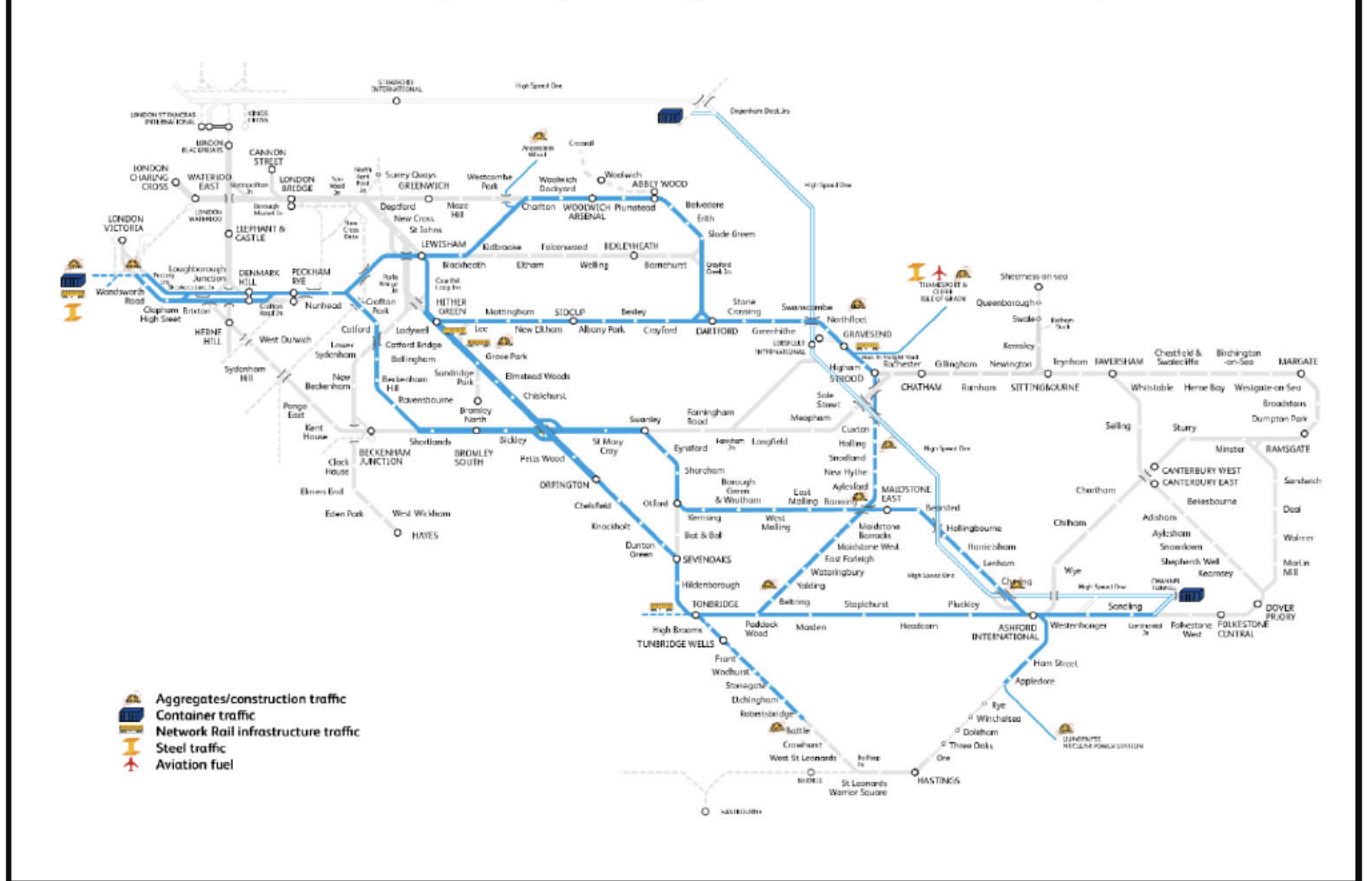
- CC. The Kent Area Route Study clearly sets out the existing series of freight routes and terminals serving Kent. Rail freight operators using these facilities include DB Cargo, GB Railfreight, Freightliner, Direct Rail Services and Colas Rail. There are a small number of approved rail freight routes in the county, providing a guaranteed number of freight paths each operating day. These are indicated in blue on the route map below¹⁹.
- DD. RTS is identified as "Ramsgate" on the far right of the map below and is located on a light grey line and therefore is clearly not on or near a blue/ approved rail freight routes line.

¹⁸ Chapter 10.1 Rail Freight Services in Kent, Kent Rail Strategy 2021 Available online at: [REDACTED] (accessed on 25 November 2021)

¹⁹ Page 50-51

[REDACTED]
(accessed 25 November 2021)

Map Showing Rail Freight Routes and Terminals in Kent



- EE. The majority of rail freight paths in Kent are utilised by construction and international traffic routed via the Channel Tunnel.
- FF. RTS is a passenger station and simply cannot be used for rail freight.

Rail Freight Gauge Clearance

- GG. The Kent Area Route Study also considers the issue of gauge clearance on different rail freight routes through Kent. The main routes currently identified and cleared for freight operation are²⁰:
 - a. Channel Tunnel via Maidstone East to Swanley (as shown on the map below nowhere near the Proposed Development, TPTS or Ramsgate Train

²⁰ Page 52

(accessed 25 November 2021)

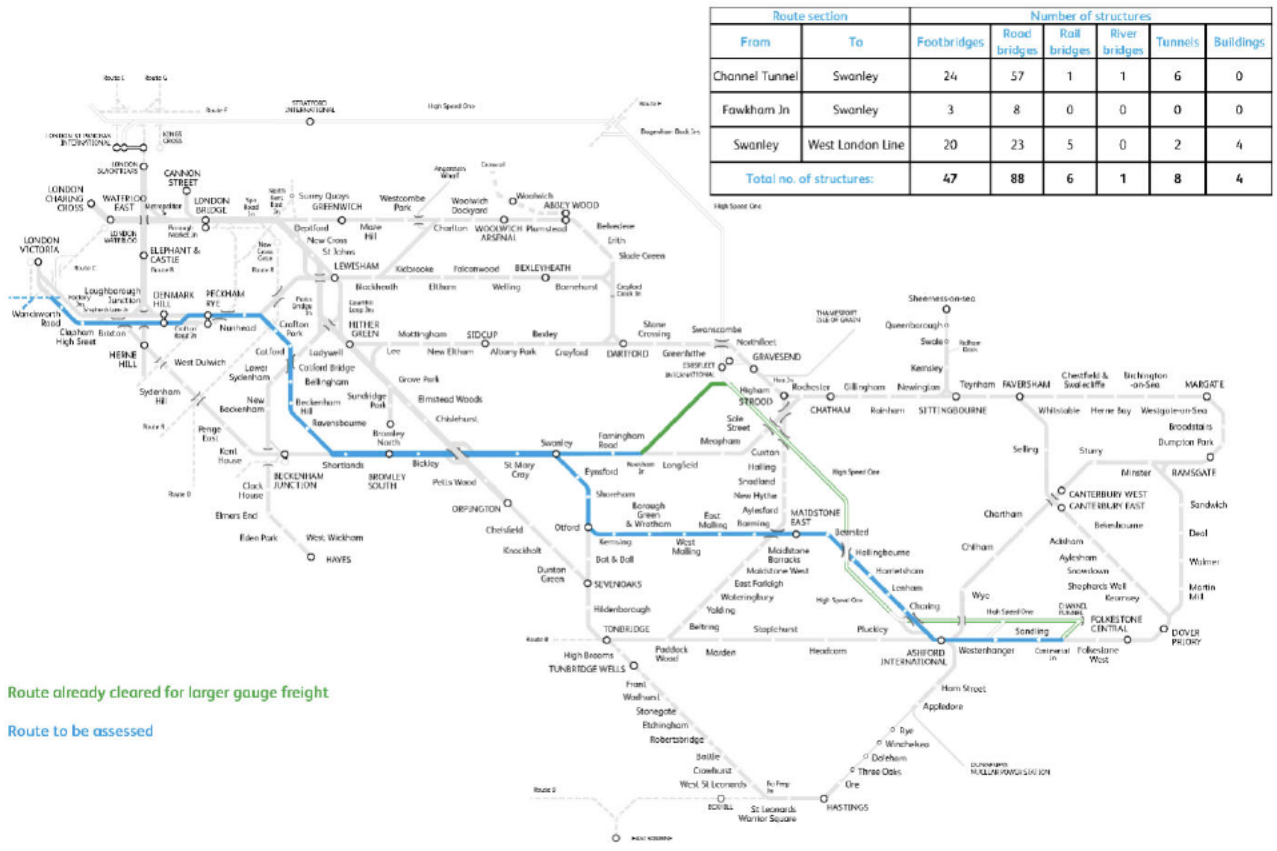
Station)

- b. Channel Tunnel via HS1 to Southfleet, HS1 link to Fawkham Junction, Mainline to Swanley (and then for both via Catford Loop and Atlantic Lines to West London Line) (as shown on the map below nowhere near the Proposed Development, TPTS or Ramsgate Train Station)
 - c. Channel Tunnel via Tonbridge to Redhill (and then via Clapham Junction to West London Line) (as shown on the map below nowhere near the Proposed Development, TPTS or Ramsgate Train Station)
 - d. Channel Tunnel via HS1 to Barking freight terminal (as shown on the map below nowhere near the Proposed Development, TPTS or Ramsgate Train Station)
- HH. As you will be aware, Ramsgate Train Station or TPTS is not anywhere near the green or blue rail freight routes on the map shown below²¹.

²¹ Page 53

(accessed 25 November 2021)

Map Showing Rail Freight Route Gauge Assessments in Kent



[source: Network Rail, Kent Area Route Study, May 2018, figure 6.17]

- II. With the exception of the route Channel Tunnel via HS1 to Barking freight terminal which is entirely on HS1 and so can accommodate up to WR12 gauge clearance, at present all the other routes can only accommodate freight traffic up to WR8 gauge clearance²².
- JJ. The HS1 is the 109 km rail line between St Pancras International in London and the Channel Tunnel and connects the international high-speed routes between

²² Page 53

London and Paris, London and Brussels and London and Amsterdam, as well as domestic routes from London to Kent. The Kent route is St Pancras International, Stratford International, Ebbsfleet International and Ashford International²³. The HS1 route is nowhere near the Proposed Development, TPTS or Ramsgate Train Station.

- KK. In recent years there has been significant growth in 'high cube' container traffic, but only the HS1 route from the Channel Tunnel through Kent can accommodate these larger units. These require specialist pocket wagons which hold the containers between the bogies of the wagon, but the clearance of Mainline routes in Kent to accommodate these would require wholesale rebuilding of tunnels, bridges and other structures and would be prohibitively expensive²⁴.
- LL. The Kent Rail Strategy concluded that the most feasible short-term policy is to ensure the full utilisation of the existing rail freight paths, including a real and substantive increase in the use of HS1 between the Channel Tunnel and Barking freight terminal by WR12 gauge containers between Continental Europe and the UK. This would deliver at least some of the modal shift required by using existing spare capacity on HS1²⁵. Again this route is nowhere near the Proposed Development, TPTS or Ramsgate Train Station.
- MM. The Kent Rail Strategy concluded long-term policy would require gauge clearance works on Mainline routes through Kent as a future option to facilitate increased modal share for rail freight in Kent²⁶.
- NN. Network Rail's Long Term Freight Strategic Planning documents up to 2043/44 show no such planned works near the Proposed Development, TPTS or Ramsgate Train Station²⁷.
- OO. Network Rail's Key Freight corridors and commodity types are shown on the

²³ [redacted] (accessed 25 November 2021)

²⁴ Page 52 [redacted] (accessed 25 November 2021)

²⁵ Page 52 [redacted] (accessed 25 November 2021)

²⁶ Page 63 [redacted] (accessed 25 November 2021)

²⁷ [redacted] (accessed 25 November 2021)

map²⁸ below.

- PP. The Proposed Development, TPTS or Ramsgate Train Station are nowhere near Network Rail's Key Freight corridors.

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[REDACTED] (accessed 25 November 2021)

Key freight corridors and commodity types

