

JOINT REPRESENTATION OF RAMSGATE COASTAL COMMUNITY TEAM AND RAMSGATE NEIGHBOURHOOD PLAN GROUP

RE-DETERMINATION OF THE APPLICATION BY RIVEROAK STRATEGIC PARTNERS LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE RE-OPENING AND DEVELOPMENT OF MANSTON AIRPORT IN KENT

This is a joint representation on behalf of Ramsgate Coastal Community Team (IP ref: 20014383) and on behalf of Ramsgate Neighbourhood Plan Group (IP ref 20014343) and is submitted in response to the Department for Transport's ("DfT's") letters of 30 July 2021 and 21 October 2021. The letter of 21 October 2021 invites representations on:

1. the Independent Aviation Assessor's Draft Report,
2. representations received on the Statement of Matters, and
3. other representations.

1. Independent Aviation Assessor's Draft Report

We agree with the overall conclusion reached by the Independent Aviation Assessor "*that there have not been any significant or material changes to policy or the quantitative need case for the Proposed Development since July 2019 that would lead to different conclusions being reached (compared with the previous ExA conclusions) with respect to the need for the Manston Development.*"

2 Representations received on the Statement of Matters

Applicant's Submission for the redetermination of the Manston Application: Document TR020002/RED

The Independent Aviation Assessor's Report considers the quantitative need for the development and concludes that there is no quantitative need.

The Applicant in Annex 1 to submission TR020002/RED attempts to conflate quantitative need and benefit as in:

6. *A demonstration of need is evidence that certain of the benefits are likely to be realised, such as the creation of jobs during the operation of the airport, but others will be realised in any event such as construction jobs, and the highway, ecological and other improvements that must be carried out before the project can come into operation.*

And again at:

8. *... These submissions show that the benefits of the project clearly outweigh the adverse impacts, even more so than one year ago when the decision was taken and two years ago when the examination concluded.*

No credible business case has ever been advanced by the Applicant: none of the many independent reports on Manston Airport has considered to be viable as a passenger airport, cargo hub or any combination of these. Furthermore, the Applicant has offered no satisfactory evidence that the benefits of the project outweigh the adverse impacts but rather, in the original submission, the Applicant admitted the proposal would have an adverse impact on local residents, while mis-representing the potential benefits of the scheme, particularly with regard to the employment opportunities it might afford.

Employment and Training

At paragraph 42 of his letter dated 9 July 2020 the Secretary of State said

... whilst noting the ExA's view that the jobs created would not be to the same extent as forecast by the Applicant ..., he concludes 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 benefits to general aviation and regeneration benefits. In reaching that view the Secretary of State notes the ExA's view that the Development may adversely affect the tourism industry in Ramsgate. Whilst he is sympathetic to any residents and business holders that may be affected he also notes the ExA's overall view that it would increase the attraction of tourists to other parts of Thanet and the wider East Kent area...

He goes on to say in paragraph 43:

The Secretary of State also notes the ExA's view that the education and training and skills financial contribution (a total undertaking of £1.25m) secured in the Applicant's UU made in favour of Thanet District Council has the potential to have a significant positive benefit on Thanet and the wider East Kent area and would ensure that the required education, employment and skills plan is properly enacted and implemented.

The Secretary of State correctly notes that the ExA found that estimates of job numbers in the original application were overstated by at least 19%. However, in July 2021 the report by York Aviation on behalf of Jennifer Dawes said '*On the basis of more realistic projections of usage of the Airport, the employment increase for Kent would be only around 3% of that claimed by RSP by year 20, ie little more than 1,000 jobs in total.*'

York Aviation continued '*To the extent that these jobs would be created through displacement of activity from other airports, this might divert economic activity from areas that have greater need when considered overall.* (para 3.20: York Aviation: Expert Evidence in Relation to the Re-Determination of a Development Consent Order for the Reopening and Development of Manston Airport, 8 July 2021).

Ramsgate Coastal Community Team and Ramsgate Neighbourhood Plan Group agree with the ExA's view that the Development may adversely affect the tourism industry in Ramsgate. However, we do not accept the implication that only tourism would suffer: there is much more to Ramsgate than the visitor economy. A detailed Conservation Area Appraisal of Ramsgate Conservation Area has recently been completed on behalf of Historic England and Thanet District Council, giving a comprehensive picture of what would be at risk. Ramsgate Conservation Area includes the town centre and Royal Harbour as well as residential areas, all directly under the proposed flight path.

While it is commendable that the Applicant should be willing to enter into an undertaking to provide a contribution of £1.25m for education and skills training it should be noted that such a commitment would principally benefit the Applicant, or their successor, in the development of their business. Furthermore, the commitment would be in the form of an initial payment of £250,000 followed by annual payments of £50,000 over a twenty-year period - with no index linking. This is a very small amount in comparison to the government's recent Levelling Up grant of £19.8m to Ramsgate and as well as grants for the nearby town of Margate and other areas of Kent within easy reach of Thanet. (Information on recent grants is attached as Appendix 1)

We would recommend that the Secretary of State take notice of York Aviation's informed view that over a 20-year period, the Development might generate an employment increase for Kent of around 1,000 jobs. This falls far short of the headline figure claimed by the Applicant of 23,000 jobs in the same period.

Strategic Plans

RSP, In Annex 2: *Planning Policies Affecting Need Including Changes Since 9 July 2020: Regional Policy*, the Applicant misinterprets and misapplies both Kent County Council's Interim Strategic Plan - Setting the Course, December 2020, and the London Plan 2021. Neither document contains statements supportive of the proposed re-opening of Manston Airport, or any reference to the Development.

The London Plan 2021 does support the use of waterways in the London Region: in presentations, the Applicant's chief spokesperson has fixed on this to talk about using electric - or more recently, hydrogen - barges to transport freight from Ramsgate to London. Plane-truck-barge-truck would be an inefficient way and expensive way to handle freight and, moreover, electric barges, or even hydrogen barges, capable of making the journey are not yet available.

In a possible response to Decarbonising Transport, the Applicant's chief spokesman has suggested that freight would be driven to Ramsgate Station at night to make use of spare rail capacity. The Kent Rail Strategy 2021 clearly shows this to be nonsensical: Ramsgate Station is not part of Kent's freight network and cost alone would prohibit inclusion in the future. The new Thanet Parkway Station is approximately 3 miles away by road from the airport terminal and is due to open in 2022. However, it has been constructed on an embankment making it totally unsuitable for conversion at a future date. There is no bus route linking the station with which the Development, instead the station will have parking spaces for almost 400 cars and serve commuters travelling out of the area to work in Dover, Canterbury, Ashford, Ebbsfleet and Central London.

2.2 Other representations received in response to the Statement of Matters

There were 440 submissions in response to the invitation in the Secretary of State's Statement of Matters dated 11 June 2021. Of these, a majority appeared to support the development. However, many of the responses in support of the development were curiously similar with the same arguments repeated again and again.

It was clear that many of the respondents in favour of the Development did not understand the proposal and, furthermore, were not familiar with the area. This lack of understanding was demonstrated by assertions that flight paths would be over the sea so noise and pollution would not be a problem.

A number of the supportive responses referred to the Applicant's claims that the Development would be a state-of-the-art green airport but again there was little evidence that they (or the Applicant) really understood the concept.

The main argument in favour was 'jobs'. At the time a paid-for advertisement on a local news site, placed by Save Manston Airport association (SMAA), actively promoted the idea that there would be 23,000 jobs for local people (the total number of jobs claimed by the Applicant, including catalytic jobs outside the area).

3 Other representations

The Secretary of State's letter refers to *Decarbonising transport: a better, greener Britain* and the *Jet Zero consultation: a consultation in our strategy for net zero aviation*. The Independent Aviation Assessor's Report concludes that they do not appear to have a material effect on the need case for the Proposed Development but that they introduce new goals around the carbon impact of airport operations and domestic aviation emissions which should be considered by the Secretary of State.

The Applicant's representative has repeatedly boasted that Manston would be a carbon neutral airport while failing to acknowledge that all UK airports must be carbon neutral by 2040. Similarly, he fails to acknowledge that, in the light of Carbon 6, re-opening Manston would restrict the potential for development at other, more suitably located, established airports. Since the publication of these two documents, Lord Deben, head to the Climate Change Committee has said that the UK must drop plans for airport expansion if it is to meet carbon reduction targets.

We note that "*Decarbonising transport: a better, greener Britain*" p21.3 Strategic Priorities, states "*Increasing amount of freight will shift from road and air to more sustainable modes...*". Later in the same document, the heading on p118 acknowledges that '*Decarbonising aviation is one of the biggest challenges across the global economy. The technological requirements to provide the power to propel aircraft the distances required far outstrip those for equivalent land-based transport.*

4 Conclusion

Successive expert reports have found that there is no quantitative need for the re-opening of Manston Airport. We endorse this view and would, in addition, argue that the Application for consent to re-open and develop of Manston Airport in Kent is both out-of-date and redundant in the light of the government's ambitions to limit the harmful effects of climate change. We ask the Secretary of State to refuse the Application.

Appendix 1

Government Funded Employment and Training Initiatives 2021

Both Ramsgate Coastal Community Team and Ramsgate Neighbourhood Plan Group support the development of a strong mixed economy with sustainable growth in all parts of the town and aim to improve the quality of life for the people of the area.

Thanet is recognised as an area with high levels of deprivation, high unemployment and low skills. A number of relevant new initiatives and government funded programmes addressing these issues were announced in the autumn both for Thanet and elsewhere in Kent. Unlike RSP's proposal for the reopening and development of the former Manston airport, these successful bids were fully informed by community consultations and respond to the character and needs of the area. Each project will be monitored and measured against key performance indicators agreed with the relevant government department.

- Ramsgate Future Investment Plan

In February 2021, Thanet District Council commissioned an independent specialist consultancy to deliver a programme of community and stakeholder engagement that would help shape an investment plan and ensure that the long-term vision for Ramsgate considered the priorities of local people and reflects the changes they would like to see.

The Investment Plan will build on the £2.7m Future High Street fund, the Heritage Action Zone and plans for the Port and seafront.

The initial stages of the programme informed a successful bid to the joint Department for Levelling Up, Housing and Communities (DLUHC) and Department for Transport (DfT) Levelling Up Fund. Thanet District Council was awarded £26.1m for two bids: £19.8m for Ramsgate and £6.3m for Margate, to be spent by 31 March 2024.

- Levelling Up Fund (Ramsgate): £19.8m

Approving the DCO would have a negative impact on the benefits of this grant

There are three components to this programme:

- a. The Port.
First stage investment in Port Infrastructure to create a Green Port for the Thames Estuary, supporting 800-1000 jobs. This will provide a hub for innovation and T-Level and apprenticeship training, allied to a modern hybrid Port, supporting renewable energy and zero carbon maritime logistics.

Joint investment with the private sector 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.

b. The Royal Harbour. **(Note: directly under the flight path)**

Investment in linked harbour buildings adjacent to the port to develop new and distinctive visitor assets, in a way that will provide important new training and employment pathways for local 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.

c. Assets to Connect to Opportunity.

Investment in two community access points in Newington (Ramsgate's most deprived community) and Central Ramsgate will provide spaces for people to access information 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 from.

Key Performance Indicators:

a. Direct productivity benefits:

100 residents per year engaging through outreach
30 young people accessing training each year from operation
70 Ramsgate residents re-entering the workforce
30 employees receiving on the job training at any given time
20 referrals from community to training providers leading to work
70 Thanet residents working in the Green Campus
20,000 hours of work experience (including T Levels) post completion
30 new apprentices per year in target sectors

b. Productive and Innovative Business:

30 new businesses accommodated at the Green Campus
5 recognised commercial collaborations per year facilitated within the Green Campus
100% Increase in turnover of Ramsgate fishing fleet within 2 years of creation of the fishing hub

c. Visitors

20% of Thanet visitors actively looking to visit Ramsgate
25% increase in footfall at the Royal Harbour
1144 M2 of vacant space brought into use and 2500 M2 of new public realm

- Levelling Up Fund (Margate): £6.3m (to be spent by 31 March 2024)
Earlier in the year Margate was awarded a Town Deal worth up to £22.2m and in October 2021 it secured £6.3m from the Levelling Up Fund for the Margate Digital project: a specialist industry-focused centre in Margate High Street.

This will allow Thanet District Council, in partnership with the EKC Group¹ and the Margate School to create, industry-relevant training space which will focus on digital technology and deliver a range of technical qualifications and offer seamless progression to Level 4 and 5 provision by introducing new Higher Technical Qualifications, supported by a government backed brand and quality mark to meet the higher-level skills of industry.

- Levelling Up Fund: Kent County Council and Districts (to be spent by 31 March 2024)

Ashford Borough Council was awarded £14.7m to support the Ashford International Studios / Newtown Works project. This will create a dynamic International Film Studios in the heart of Ashford along with commercial and residential development.

Medway secured £14.5million for investment in historic landmarks in Chatham to support the area's flourishing creative sector and provide further opportunities for economic growth including new co-working and studio spaces.

- Community Renewal Fund: Kent County Council and Districts (to be delivered by 31 March 2022)

Grants confirmed in November 2021 include:

- £1.02m Thanet and Dover Skills Renewal
- £653k Employment and Support Hub for Canterbury and Thanet
- £447k Breaking Barriers Inclusive Employability
- Various other employment, business job programs focussed on NetZero Innovation, partnerships for food and health

¹ East Kent College Group