

# Thanet Green Party

To MANSTON AIRPORT CASE TEAM ([manstonairport@planninginspectorate.gov.uk](mailto:manstonairport@planninginspectorate.gov.uk))

## **MANSTON AIRPORT DCO REDETERMINATION (CASE REF: 20013942)**

We are frankly astonished at finding ourselves writing yet again on this matter.

The Planning Inspectorate's own exhaustive and detailed investigation in 2019 advised against the grant of a Development Consent Order. You established quite clearly that *"the Applicant has failed to demonstrate sufficient need for the Proposed Development"*, and thus there was no case to make for a National Strategic Infrastructure Project.

In doing so you confirmed the findings of no less than TWELVE previous studies from independent experts including York Aviation, Avia Solutions and Altitude Aviation, who all concluded that a commercial airport at Manston was simply not viable – a fact clearly demonstrated by the three failed attempts to run it as such since the RAF left the site and three further reports since.

The Secretary of State was not satisfied and ruled for the DCO – a decision later quashed.

He then commissioned a further independent report on need from Ove Arup Ltd. Their report, published in October this year, confirmed 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."*

On receipt of this, the Secretary of State asked Interested Parties AGAIN to submit their comments on the need for this project. We are mystified as to why. Surely it has been amply demonstrated that there is simply no need for this development? How can the Department of Transport justify this continued expenditure of public money – not to mention the continuing uncertainty and stress for local Councils, businesses and residents while a decision is delayed – and the time required to send yet more submissions such as this?

Despite our major reservations on the process in this case, we outline once again below our comments, in the hope that this will be the last time this is required, and that the Secretary of State will finally draw the only possible conclusion from the extensive evidence provided to him.

### Lack of need for this development:

- Location: Manston was an excellent location as a wartime RAF base, but it is in the wrong place for a commercial operation. It is in the far SE of the country, bordered on 3 sides by sea and situated within a few hundred metres of the town of Ramsgate, with extremely limited space to develop warehousing and fulfilment operations.
- Accessibility: Road links from Manston are very poor. Local B roads run from the airfield to the A299; from there the 2-lane M2 runs to the M25, and by this point freight has still only reached outer London! A new Parkway station is under construction but has not been linked with the airfield, so our poor local roads would still be required for rail transport to be used. The ferry port at Ramsgate is disused, and even if revived it would again require fleets of trucks to transport goods there – in this case through the centre of a historic town.
- Competition: The applicants have stated clearly that their business plan relies on taking business from other airports. We remain puzzled as to why this does not automatically negate any case for need – but in any event it appears extremely unlikely that operators would transfer from well-connected existing freight hubs to Manston. Your own report concluded: *“the levels of freight that the Proposed Development could be expected to handle are modest and could be catered for at existing airports (Heathrow, Stansted, EMA, and others if the demand existed).”* (PINS, 2019, p92)
- Spare capacity elsewhere: There is well-documented existing spare capacity at Stansted, East Midlands and Heathrow Airports. Situated in the ‘Golden Triangle’ in the centre of the country, EMA is also part of a new Freeport. The Supreme Court decision to reverse the blocking of Heathrow’s third runway plans will further expand a long-established, well-connected airport with good facilities. Heathrow already handles over 60% of the UK’s freight tonnage, and Government figures show a third runway will increase this significantly.
- Policy preference for existing facilities: In your own report you point out a clear preference in the ANPS for expanding and making better use of existing facilities rather than building from scratch: *“Government policy states that the Government is minded to be supportive of all airports which wish to make best use of their existing runways, including those in the South East (ANPS paragraph 1.39)”* (PINS, 2019 p98)

### Need vs Benefit: Employment

- Job figures: The one area in which PINS’ 2019 report identified possible benefit from the applicant’s proposals was in expanding employment opportunities in this disadvantaged coastal area. However, you queried the applicant’s assertion that it would create 23,000 jobs. Since then, the applicant’s job projections have reduced to 2,150 after 5 years of operation – quite a significant change! This remains extremely ambitious, however, given that Manston as a commercial airport has never employed more than 500 people in the past, aviation as a whole is in decline, cargo handling is increasingly automated and challenging carbon emission targets are now enshrined in law.
- Local employment: We would further observe that ‘local’ in the applicant’s terms refers to a 90-mile radius around the site, which takes in London, much of the South East and indeed a considerable stretch of Northern France and Belgium. This is not ‘local’ employment in any real sense. Even if its job projections were achieved, they would be unlikely to make much difference to employment in Thanet for Thanet residents.

- Expansion of tourism: Employment has increased in Thanet since the airport last closed, and tourism jobs in particular have mushroomed. In 2017, even before the positive impact of post-Covid 'staycations', Visit Kent reported a dramatic increase of 10% in day trips to Thanet, against a national figure of 0.8%. The number of jobs supported by tourism rose by nearly 9% to 7.950, with tourism accounting for 19% of total Thanet jobs. These jobs are threatened in Ramsgate by the prospect of planes flying over our historic harbour at a height of a few hundred feet every 12 minutes throughout the day – so for every job created by the applicant's proposal, it appears likely that more may well be lost in the (much more sustainable, and burgeoning) tourism sector.
- Levelling Up: Ramsgate has recently been awarded significant funding (just under £20m) from the Government's Levelling Up fund for projects which include the development of a green employment & training hub at Ramsgate Port which will create sustainable jobs with training, building on the current work of the area's two successful wind farms. The training emphasis is particularly good news for young people in Thanet, whose unemployment rates are highest. These are truly local jobs for the 21st century – sustainable, well paid and with prospects, unlike the proposed airport roles which, from the information available, appear mainly to be dwindling jobs in cargo handling.

### Need vs Benefit: Climate

- Carbon budget: The Government's sixth carbon budget commits us in law to cutting emissions by 78% by 2035 in comparison with 1990 levels. If a new facility at Manston is approved, it will require nearly 2% of the aviation carbon budget – a problem as the allocation has already been taken up by existing providers. Your 2019 PINS report concludes that the development *"will have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets"* and that *"this weighs against the granting of development consent"*.
- Climate Emergency declarations: In 2019 both Thanet District Council and Kent County Council declared Climate Emergencies, establishing a policy presumption in both cases against development that increases carbon emissions in the area. Thanet's Local Plan reserves the airfield for aviation use on condition a DCO is granted and not otherwise.
- 'Green airport' claims: The Applicant has been at pains to claim the new facility as 'a green airport' and even 'carbon neutral within 5 years of commencing operations' (Thanet District Council Members' Briefing, July 2021) – but this is disingenuous. It will be the terminal buildings alone that are carbon neutral: this will not of course apply to the aviation or the huge numbers of trucks that will be required to shift cargo by road, which will add considerably to Thanet and Kent's carbon emissions.
- Secretary of State's commitment: In his recent speech at COP26, SoS Grant Shapps stated: *"I'm proud to be uniting world leaders to tackle climate change, creating new opportunities for clean growth, green jobs & improved air quality right across the globe."*

We call upon the Secretary of State to honour his commitment at COP and recognise the irrefutable evidence before him by refusing this application.

Thanet Green Party Branch Committee, December 2021