



## **REDETERMINATION OF THE APPLICATION BY RSP LTD FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE REOPENING AND DEVELOPMENT OF MANSTON CARGO AIRPORT IN KENT**

**- UNIQUE REF: 20013942**

Ramsgate Town Team is the umbrella body representing and supporting a broad section of traders and voluntary bodies in Ramsgate, East Kent. Our mission is to make Ramsgate a great place to live, work and visit. We are a registered Interested Party for this Enquiry.

Sixteen independent reports have now been produced demonstrating that RSP Ltd's above proposal is not viable. Only one, by a consultant who is on the applicants' Board, has implied it may be. During the 2019 PINS enquiry the latter consultant was asked specifically about the viability of the scheme and stressed that she had never in fact been asked to consider it. <sup>1</sup>

PINS' extensive 2019 enquiry concluded that the applicant had failed to demonstrate need and recommended the DCO be refused. The Secretary of State commissioned further investigation earlier this year from Ove Arup Ltd, who also conclude: *"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..."*

Nevertheless, the Secretary of State has now requested yet more submissions from interested parties on the issue of need. It is difficult to know what to say that will not repeat the solid evidence the SoS already has before him, but we summarise the facts below.

Need: As evidenced previously, there is clearly no need for this development because:

1. As PINS concluded, the proposed development cannot be expected to handle large amounts of freight in comparison with established airports such as Heathrow, East Midlands and Stansted, even with its proposed increase in scale of operations from its most recent failed incarnation. This makes it difficult to see this as an NSIP.
2. The applicant's business plan depends on taking business from other airports - a highly unlikely event, and again one that makes it difficult to see this as an NSIP.
3. The December 2020 Supreme Court judgement on the third runway will lead to substantial additional capacity at Heathrow, the UK's largest & busiest airport. PINS (2019) conclude that this alone could cater for the traffic that might have been diverted to Manston.
4. At the UK's second largest cargo airport, East Midlands, 13% of total UK air freight was handled in 2019. EMA has substantial spare cargo capacity, is located centrally in the country and is surrounded by logistics and warehousing facilities, making it a strong candidate for future cargo expansion. Distributor UPS, for example, announced in September that it had doubled its capacity with a new warehouse at EMA. <sup>2</sup>
5. In the Southeast, Stansted is a well-established cargo airport with strong predicted growth in cargo ATMs since 2016. The smaller but closer Lydd airport is also expanding.

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<sup>1</sup> Dr Dixon: "I was asked to produce a forecast in terms of ATMs and tonnage. Whether that was viable is not part of the Azimuth Report." (Hearing transcript, 21.3.2019)

<sup>2</sup> <https://www.aircargonews.net/airlines/ups-doubles-capacity-with-expanded-east-midlands-airport-hub/>

6. It is hard to believe that these well-established businesses would permit a new airport to move in on their cargo business - particularly after Covid when all airports' custom and revenue reduced dramatically, priming them for competitiveness.
7. It is also hard to see how an airport in the extreme Southeast of England, with sea on three sides and very poor road & rail connections, forced to move both cargo and fuel by road, will be in any position to compete at all with existing successful, much better located airports, let alone take significant business from them.

For these reasons, all set out in detail for the SoS in previous independent expert reports, we conclude there is no need for this development.

Benefits: PINS identified possible new jobs as the sole plus for the scheme in 2019; however:

1. In its three previous failed incarnations, Manston Airport never employed more than 500 people. When it last closed, it employed somewhere between 100 and 150 people - around the same number as Ramsgate's Wetherspoons pub.
2. The applicant plans to scale up previous activity at Manston - yet it has reduced its jobs forecast from 23,000 to just over 2,000 after 5 years. York Aviation suggest 1,000 jobs after 20 years may be a more realistic figure. Frankly, we cannot understand why so much public money & time has been committed to considering such a small-scale project.
3. Cargo handling is increasingly automated. RSP Ltd's Mr Freudmann has made much of the financial benefits of such technological advances in past statements. This does not bode well for employment prospects for local residents at the new facility.
4. The 'local' jobs in the applicant's documentation are identified as for people living within a radius of 90 miles. To address unemployment, and particularly youth unemployment, in Thanet, a hyper-local approach to recruitment would be needed.

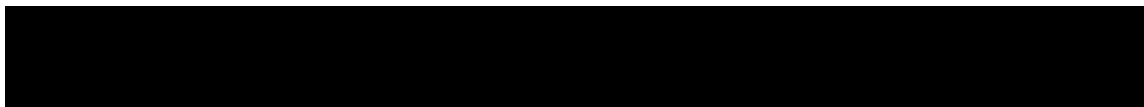
These facts suggest that any job growth resulting from the applicants' scheme will be very limited and may well have little positive effect in Thanet at all - while on the other hand:

Disbenefits: Thanet's growth sector in recent years has been tourism (see Visit Kent infographic<sup>3</sup>), which now accounts for some 20% of local employment.

In Ramsgate, in neighbouring Herne Bay, and to a slightly lesser extent in the rest of Thanet, the burgeoning tourist economy is directly threatened by this scheme, which its own authors admit will have 'significant adverse effects' on Ramsgate:

1. Because of its extreme proximity to the airfield, the historic town of Ramsgate will have planes flying overhead at only a few hundred feet.
2. Because of the number of ATMs required to qualify as an NSIP, Ramsgate will be overflown approximately every 12 minutes from 6am until 11pm.
3. Because cargo planes are usually retired passenger planes, they are usually noisier and more polluting than more modern planes.
4. Because of the above, levels of vibration will be considerable, with likely adverse effects on Ramsgate's extensive array of historic buildings and heritage assets.
5. So visitors to Ramsgate will be treated to the sound, sight and smell of elderly cargo planes constantly circling immediately above their heads and the town's heritage crumbling before their eyes, and will be rocked to sleep by vibrations and woken by aircraft noise. We are struggling to see how this is likely to encourage a return visit.
6. PINS' 2019 report concludes: *"the amenity impacts from the construction & operation of the Proposed Development would adversely affect the tourism industry in Ramsgate."*

The above suggests to us that the applicants' scheme is likely to have a negative rather than positive effect on job growth, certainly in Ramsgate and very probably more widely.



Knock-on effects: A series of secondary effects appears likely to result from RSP Ltd's plans:

1. Traffic congestion: The huge number of HGV movements per year required to service the Manston facility, both to transport cargo and to bring in fuel in the absence of a pipeline, would be far in excess of the ability of Thanet's roads to cope. Severe traffic congestion would result, with further air pollution and vibration damage to roads, bridges & buildings.
2. Safety concerns: Ramsgate's Nethercourt estate sits a few hundred metres from the airfield, and some residents have received disturbing communications from RSP Ltd during November hinting at compulsory purchase of their land. There is an insufficient safety zone around the airfield: it is far too close to a town of 45,000 people, with new estates under development on greenfield sites even closer to the airport as we write.
3. Network Rail concerns: Network Rail has raised concerns since the inception of RSP's scheme that *"certain works and land acquisition powers proposed for this DCO scheme which, if consented without satisfactory protections for Network Rail, would materially prejudice Network Rail's ability to comply with its statutory and regulatory obligations to operate a safe, efficient and economical national rail network."* As recently as July of this year, its submissions indicated that these concerns had not been addressed.
4. National security concerns: In July this year, the MoD's submission stated blankly: *"The MoD maintains its objection to the proposed development."* This results from the issue of the MoD's High Resolution Direction Finder (HRDF) - an antenna and associated equipment currently located on the airfield, with a requirement for 120m radius clear of buildings, structures or solid objects, and no viable proposals for its relocation. The MoD comment: *"During the application process, the applicant has stated that a replacement HRDF can be provided that will ensure that the current service/capability will not be impaired. At this time however, no evidence has been submitted to demonstrate that this is the case."*
5. Levelling Up concerns: We are pleased to note the Government's commitment to levelling up disadvantaged areas like Thanet, with its poor educational and health outcomes, and are delighted that Ramsgate (the town which will suffer 'significant adverse effects' from RSP's proposals) has been selected for £20m of Levelling Up Fund investment. However, the combination of disrupted sleep, disrupted lessons, poor air quality and noise pollution this scheme will bring would result in the reverse of levelling up for our town.

Policy considerations: The 2008 Climate Change Act committed the UK to an 80% reduction in carbon emissions on 1990 levels by 2050. June 2019's secondary legislation extended that target to 'at least 100%'. These targets are incompatible with aviation expansion.

1. The UK is currently not even on track to meet its previous target of 80% emissions reductions by 2050. The Climate Change Commission describes the net zero target as 'technically feasible but highly challenging'.
2. Government policy favours 'best use' of existing airport capacity rather than new builds.
3. To quote Alan Stratford Associates: *"Manston's potential 1.9% share of the UK's aviation carbon target by 2040 is implicitly already allocated to other airports, many of which have existing planning consent for such growth. In these circumstances, DCO consent for the new Manston development must be regarded as unjustified."*<sup>4</sup>
4. If climate change is not addressed as a matter of urgency, substantial areas of Thanet will be under water, rendering the current discussion somewhat academic.

In light of the above, we urge the Secretary of State to refuse the Development Consent Order.

