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

Date: 3 December 2021

Our Ref: SoS/R/020

Email: [manstonairport@planninginspectorate.gov.uk](mailto:manstonairport@planninginspectorate.gov.uk)

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**For the attention of the Manston Airport Case Team**

1. This submission is in response to the SoSFT's letter of 21 October 2021 and specifically paragraph 6.
2. We submit our comment to the First Round of Consultation herewith as a formal consultation response to the Second Round of Consultation.
3. Our comment is in response to submissions: Adrian Dowling [[TR020002-005488](#)]; Adrian Hilton [[TR020002-005558](#)]; Andrew Wilson [[TR020002-005603](#)]; Liam Coyle [[TR020002-005532](#)]; Antoinette Girdler [[TR020002-005739](#)]; Angela Stevens [[TR020002-005657](#)]; Sma Matter 4 [[TR020002-005823](#)]; Adam Cowell [[TR020002-005582](#)]; Adrian Hilton [[TR020002-005558](#)]; Annie Webster [[TR020002-005562](#)]; Adrian Pearce [[TR020002-005527](#)]; Ann Smith [[TR020003-005622](#)]; Terence Huckstep [[TR020002-005382](#)]; Linda James [[TR020002-005412](#)]; Alison Bates [[TR020002-005614](#)]; Tina Brown [[TR020002-005676](#)]; Anita Rothermel [[TR020002-005489](#)]; Alex Gale [[TR020002-005499](#)]; Andrew Hurst [[TR020002-005641](#)]; (together the “**A-T Submissions**”)

**Education, Employment and Skills**

4. We acknowledge that in the examination the ExA concluded that Education, Employment and Skills Plan and provisions provide a significant benefit from the

Proposed Development<sup>1</sup>.

5. **However**, we respectfully draw to the attention of the Secretary of State and to A-T Submissions, that since the examination there are a number of factors which will adversely impact and diminish/ extinguish this conclusion specifically the:
- a. Impact Of The Reduction In Activity At Heathrow On The West London Economy
  - b. Adverse Impact By and From The Proposed Development On The Successful Ramsgate Future Levelling Up Funding Bid
  - c. Impact Of And On Other Successful Funding Bids- The Kent County Council Led Community Renewal Fund And The Successful Margate Digital Levelling Up Funding Bid
  - d. Impact Of Lack Of Regional Policy Support
  - e. Results Of Skills And Employment Logistics Reports
  - f. Impact Of Opening Of Thanet Parkway Train Station on Employment, Training and Skills Opportunities
  - g. Adverse Impact By and From The Proposed Development On Attainment Levels Due To Exposure From Aircraft Noise From A Baseline Aircraft Noise Level Of Zero
  - h. Adverse Effect Of Lack Of Need Identified By 4 Independent Experts Since The Examination.

**6. Impact Of The Reduction In Activity At Heathrow On The West London Economy**

- a. A number of reports published earlier this year specifically Oxford Economics Report for West London Alliance (“WLA”)<sup>2</sup> highlight how reduction in activity at Heathrow has had and will have knock-on impacts for the WLA economy.
- b. The Union Connectivity Review (“UCR”) has identified a number of UKNET Airports. The Proposed Development is not included. Heathrow is a

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<sup>1</sup> Para 6.10.151 of the ExA Recommendation Report Available online at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed on 3 December 2021)

<sup>2</sup> Oxford Economics How Has Coronavirus Impacted the West London Economy Available online at:

(accessed 3 December 2021)

UKNET airport<sup>3</sup>.

- c. It is essential to support an existing UKNET airport's survival and must take precedence over any new airport opening in order for the successful operation of UKNET.
- d. We respectfully remind the Secretary of State and A-T Submissions that at the Transport Committee on 21 September 2021 in response to a question from the Chair as to whether [Heathrow was] still looking at a third runway for Heathrow?

**John Holland-Kaye** (Chief Executive Officer, Heathrow Airport) responded:

*"Yes, absolutely. It is not just for Heathrow; it is for the UK. If we want to provide the benefits we have talked about, connecting all of Britain to global growth, **providing the capacity for cargo as well as for passengers—we need an expanded hub airport.** That is the only way we can take the battle to Paris, Frankfurt and Schiphol. **Parliament voted for that a few years ago. We have paused that, of course, during the pandemic but we will be getting back onto that as soon as we can**"<sup>4</sup>. Bold added for emphasis)*

- e. We respectfully remind the Secretary of State and A-T Submissions that case law has shown that to be considered a piece of strategic economic infrastructure of national importance any benefits such as an employment must extend beyond a local authority (in this case Thanet District Council) *"...and if the contrary view were taken then "the development of most if not all airports would be nationally significant, including very small schemes"*<sup>5</sup>.

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<sup>3</sup> Page 29 Union Connectivity Review published 26 November 2021 Available online at:

[REDACTED] accessed 30 November 2021)

<sup>4</sup> Q55 Transport Select Committee Oral evidence: Airlines and airports: supporting recovery of the UK aviation sector, HC 683 Tuesday 21 September 2021 Ordered by the House of Commons to be published on 21 September 2021. Available online at: [REDACTED] (accessed 19 November 2021)

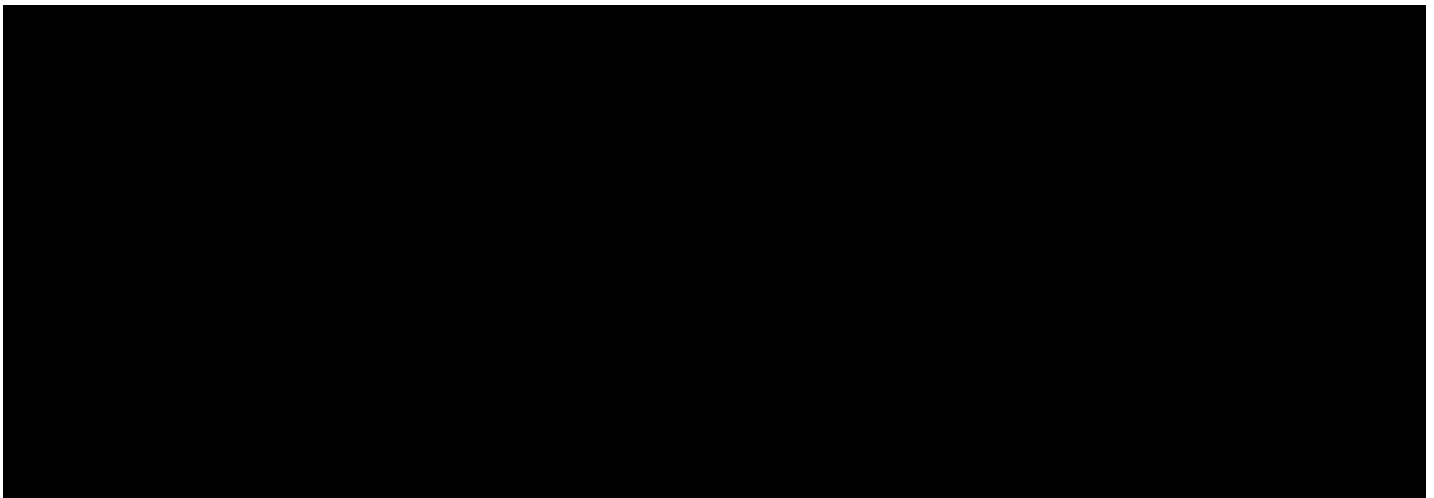
<sup>5</sup> Paras 50 and 119 of R (Ross and Saunders (acting on behalf of Stop Stansted Expansion)) v. Secretary

**7. Adverse Impact By and From The Proposed Development On The Successful  
Ramsgate Future Levelling Up Funding Bid**

- a. We respectfully draw to the attention of the Secretary of State and to the A-T Submissions, that on or around 27 October 2021, Ramsgate was successful in its Levelling Up bid in the sum of £19,840,000 known as **Ramsgate Future**.
- b. There was and will be support from organisations - London Array (wind farms); Vattenfall (wind farms); Thames Estuary Growth Board; University of Greenwich and University of Kent<sup>6</sup>.
- c. Ramsgate Future is **not** dependent on the Proposed Development.
- d. The Proposed Development is **not** mentioned as part of and/or did not provide support for the Ramsgate Future Levelling Up Fund Bid whatsoever<sup>7</sup>.
- e. There are 3 components to Ramsgate Future.

- i. The Port<sup>8</sup>

Investment in Thanet District Council's Port Infrastructure to create a Green Port for the Thames Estuary, providing around 800 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. Investing jointly with the private sector Thanet District Council 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.





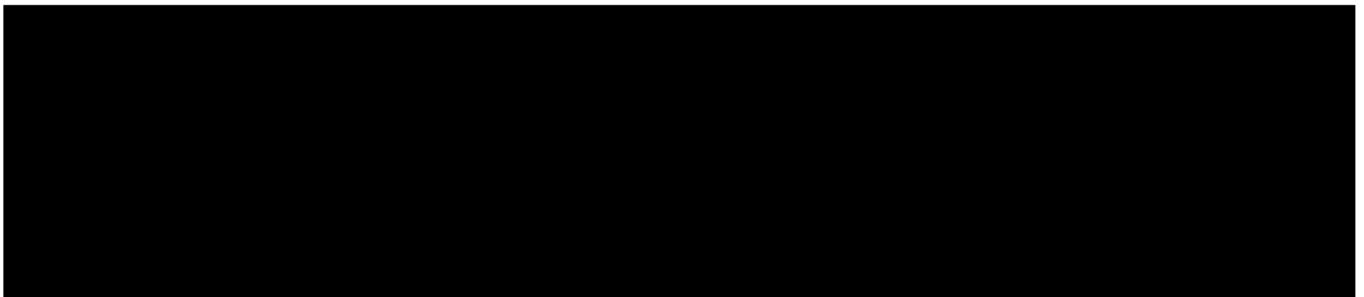
ii. Royal Harbour<sup>9</sup>

Investment in Adjacent to the Port, at the Royal Harbour, Thanet District Council will link harbour buildings to develop new and distinctive visitor assets, mobilised in a way that they will provide important new training and employment pathways to 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.

iii. Assets to Connect to Opportunity<sup>10</sup>

Thanet District Council will invest in two community access points in Newington (our most deprived community in Ramsgate) and Central Ramsgate. These will provide the 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 out of.

f. The locations of Ramsgate Future are shown below<sup>11</sup>.

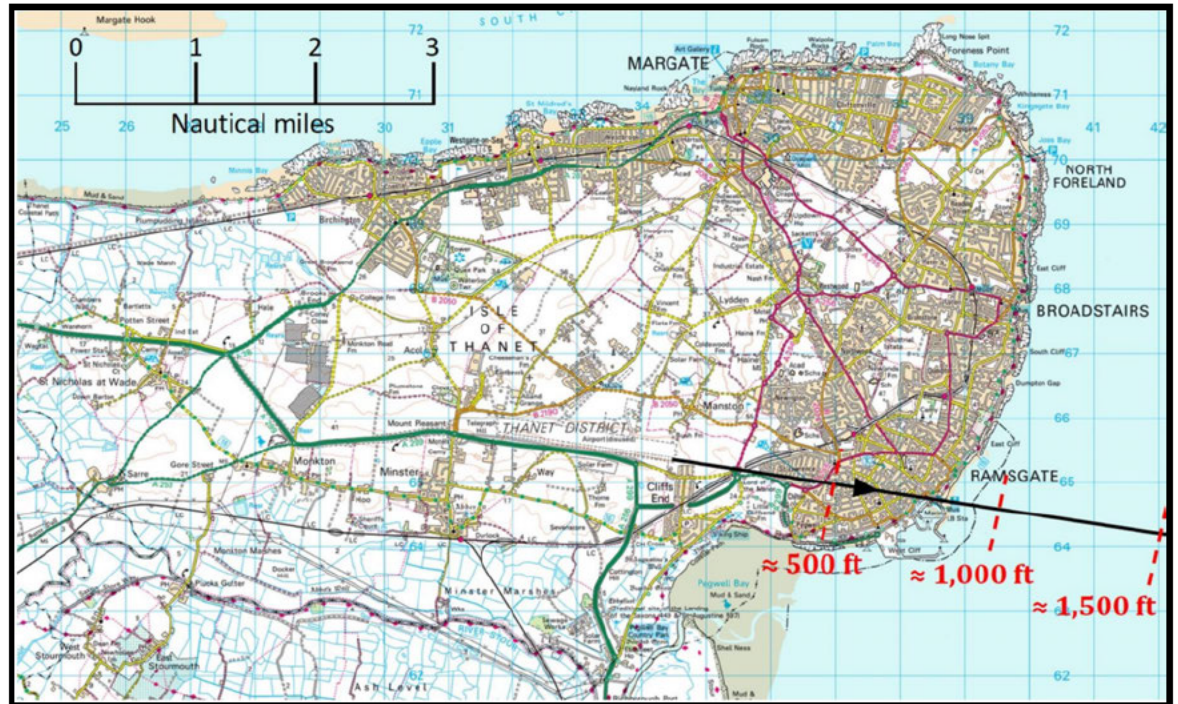




**THE LOCATIONS OF ALL 3 RAMSGATE FUTURE COMPONENTS ARE SHOWN ABOVE**

- g. We would remind the Secretary of State and the A-T Submissions that the Applicant published on the Civil Aviation Authority website earlier this year the altitudes of planes that the planes would actually be flying at over Ramsgate to and from the Proposed Development<sup>12</sup>.

If the DCO and airspace were granted, very large cargo planes would fly overhead at a height of 250 feet to 700 feet every 10/15 minutes over residential, green and open spaces, religious, medical, cultural, heritage, educational, retail, hospitality, industry and tourism providers and facilities<sup>13</sup>. Please see the Applicant's map below.



- h. Some close ups of the Levelling Up Bid: Ramsgate Future components<sup>14</sup>

<sup>12</sup> Applicant's submission to the Civil Aviation Authority known as Aviation Workshop Presentation at Page 11 uploaded to the public on 12 March 2021 Available online at:

[\[redacted\] 2](#) (accessed on 3 December 2021)

<sup>13</sup> *Ibid*

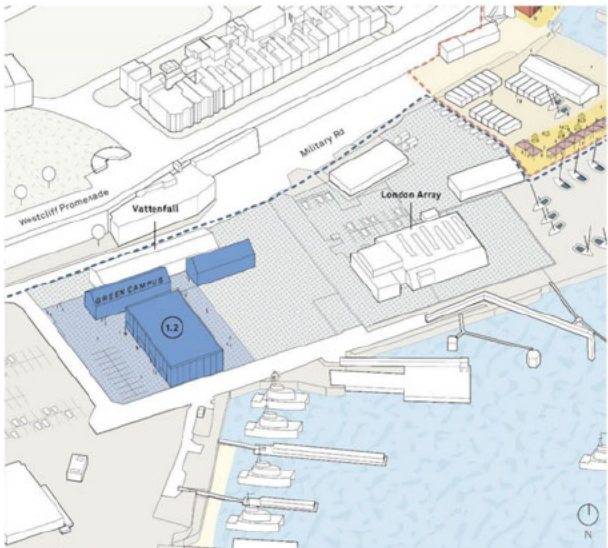
<sup>14</sup>

[\[redacted\]](#) (accessed 3 December 2021)

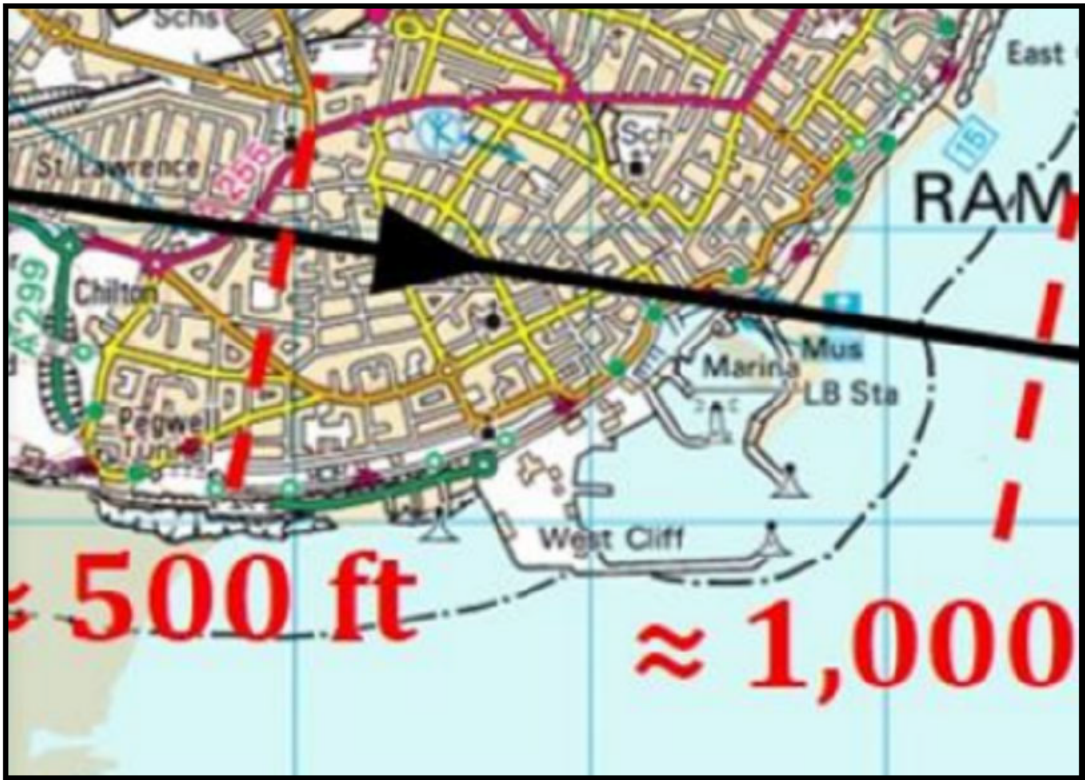


and Corresponding Altitude of flights are shown on the pages below

**Investment** - New facilities to support Green Port aspirations including Operations and Maintenance Centre of Excellence, Maritime skills training centre, Low Carbon Business Centre

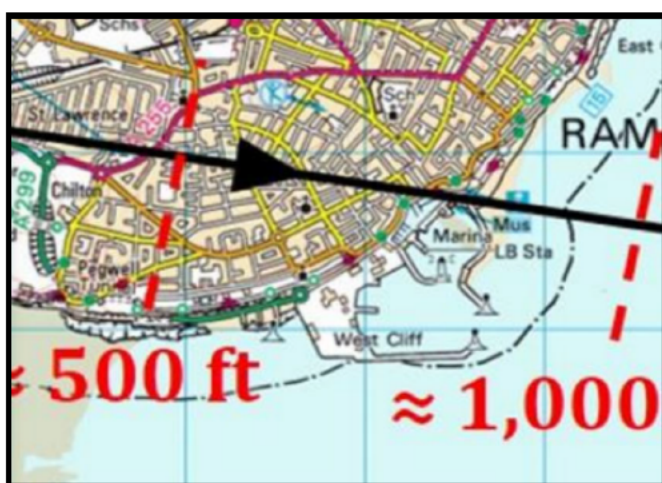
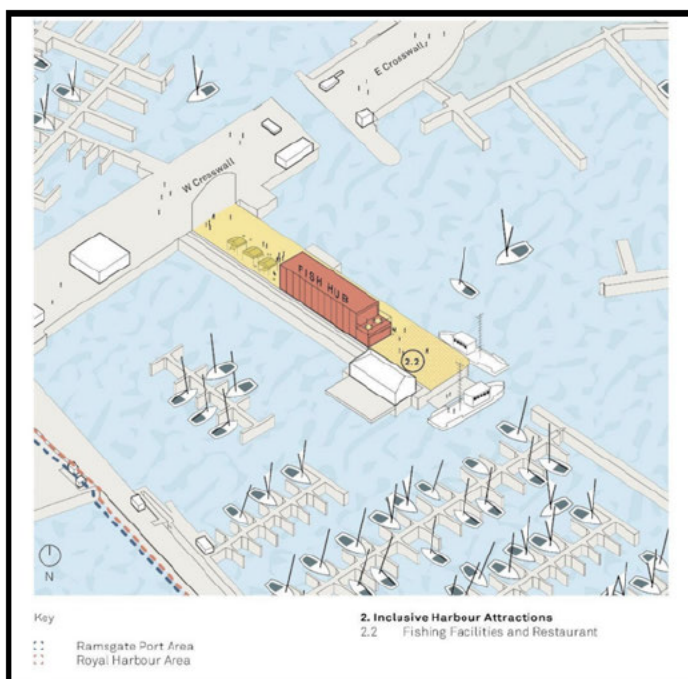


- Key
- Ramsgate Port Area
  - Royal Harbour Area
- 1. Green Port Ramsgate**
- 1.2 Green Campus:
- Operations & Maintenance Centre of Excellence
  - Clean Tech Start-up & Scale-up space
  - Innovation & Trailblazers: space for testbed activity



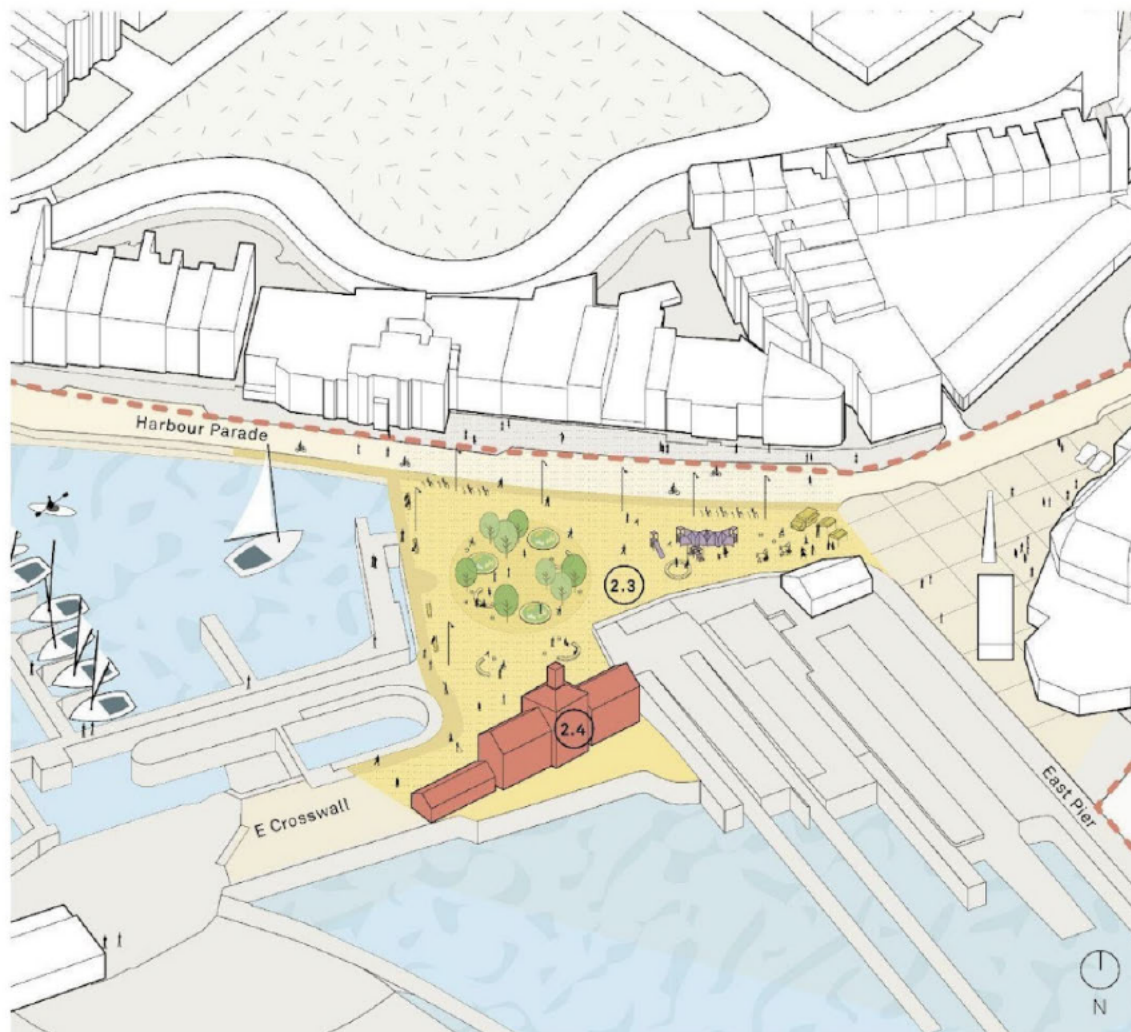
**Investment:** Refurbishing the Smack Boys heritage building as a boutique hotel

Image: Smack Boys Buildings





**Investment:** Development of new public realm and connections including the transformation of Pier Yard car park into a new town square.



Key

-  Ramsgate Port Area
-  Royal Harbour Area

**2. Inclusive Harbour Attractions**

- 2.3 Pier Yard Public Realm
- 2.4 Clock House Building

As you can see from the image below the Ramsgate Future development of new public realm and connections including the transformation of Pier Yard car park into a new town square is directly under the proposed flight path with large cargo planes overhead at an altitude of circa 700 feet. In any event planes would be at less than

1000 feet (305 metres).



**8. Impact Of And On Other Successful Funding Bids- The Kent County Council Led Community Renewal Fund And The Successful Margate Digital Levelling Up Funding Bid**

- a. We respectfully refer to our submission to the Second Consultation specifically: SoS/R/012 Pages 44-45.
- b. The Community Renewal Fund successful bids are shown below<sup>15</sup>. It is of note that neither the Applicant nor its MSE-Board<sup>16</sup> attended any of the workshops nor did they put in a bid.

Kent County Council	Breaking Barriers - Inclusive Employability	£446,697
Kent County Council	Bridge the Gap	£572,850
Kent County Council	Canterbury and Folkestone and Hythe Skills Renewal	£1,018,641
Kent County Council	Diversity House: Centre for Innovation and Development	£432,104
Kent County Council	Employment and Support Hub - Canterbury and Thanet	£653,367
Kent County Council	Growing Green: A net-zero innovation pathway for micro and SME businesses	£523,384
Kent County Council	Kent and Medway Partnership for Enterprise, Food and Health	£539,288
Kent County Council	Net Zero Pathway for Change	£638,115
Kent County Council	Swale and Ashford Skills Renewal	£1,018,641
Kent County Council	Thanet and Dover Skills Renewal	£1,018,641

**9. Impact Of Lack Of Regional Policy Support**

- a. We respectfully refer to our submission to the Second Consultation specifically SoS/R/012 Pages 16-19 which evidences that there is no regional policy support (skills) for the Proposed Development. The South

<sup>15</sup> <https://www.gov.uk/government/publications/uk-community-renewal-fund-successful-bids> (accessed 3 December 2021)

<sup>16</sup> The MSE-Board according to the Applicant's website has met only twice on 1 October 2020

(accessed 3 December 2021) and on 27 February 2020

(accessed 3 December 2021)  
attended an event on 14 March 2020

3 December 2021)



East Local Enterprise Partnership (SELEP) Skills Report refers to the SELEP's "two airports", (Stansted and Southend), and includes details of the Stansted Airport College, supported by the SELEP with £3.5m of public funding<sup>17</sup>.

- b. Clearly for any local people to use airport-related skills in any future job opportunities, the Proposed Development must show sustained economic viability which is predicated on market need.

**10. Impact Of Skills and Employment Logistics reports such as the Skills and Employment report 2020 by Logistics UK<sup>18</sup>**

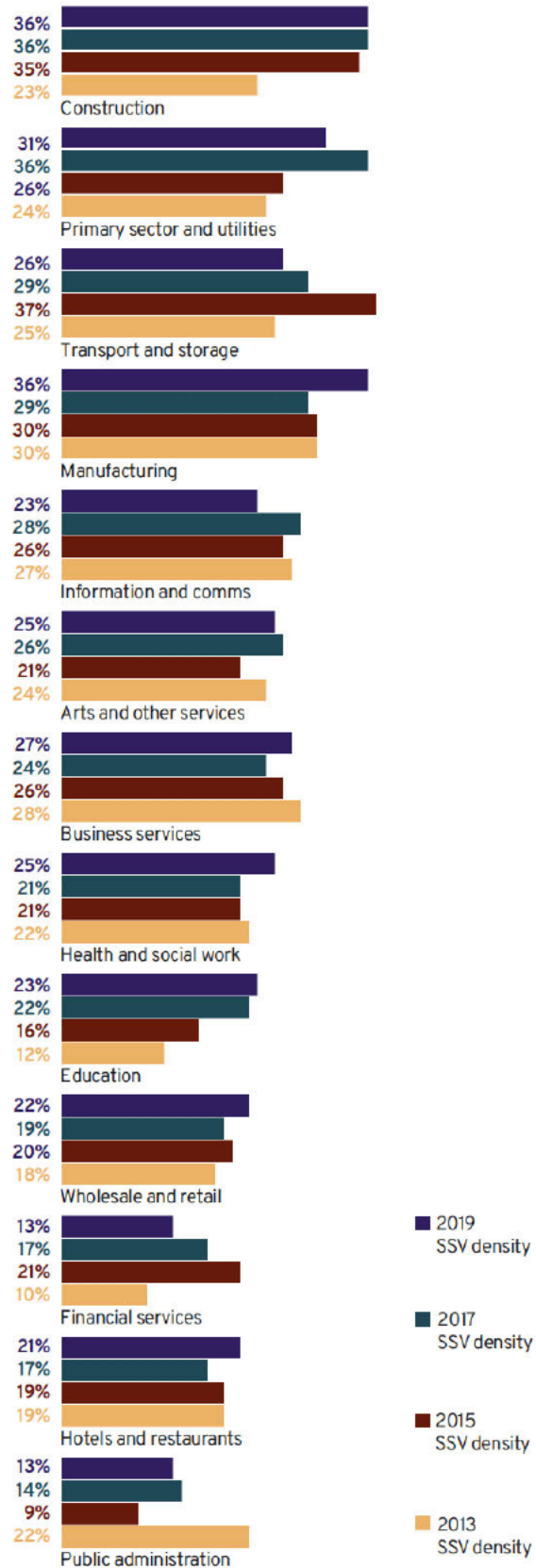
- a. The Proposed Development skills, education or training by the Applicant does **not** meet any skills-shortage gaps and rather it perhaps adds to them (construction). The density of skills-shortage vacancies (the proportion of vacancies that were hard to fill because of reported shortages) varies by sector. As a proportion of all vacancies in the sector, the density of skill-shortage vacancies was highest in construction and manufacturing, with transport and storage in fifth place down from third place in 2017; and can be seen in the table below:

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<sup>17</sup> South East LEP (SELEP) Local Skills Report (March 2021) Available online at:

(accessed on 16 November 2021)

# 11 Density of skill-shortage vacancies (SSVs), by sector



Source: Employer Skills Survey, 2019; Department of Education, November 2020

**11. Impact Of the Opening of Thanet Parkway Train Station**

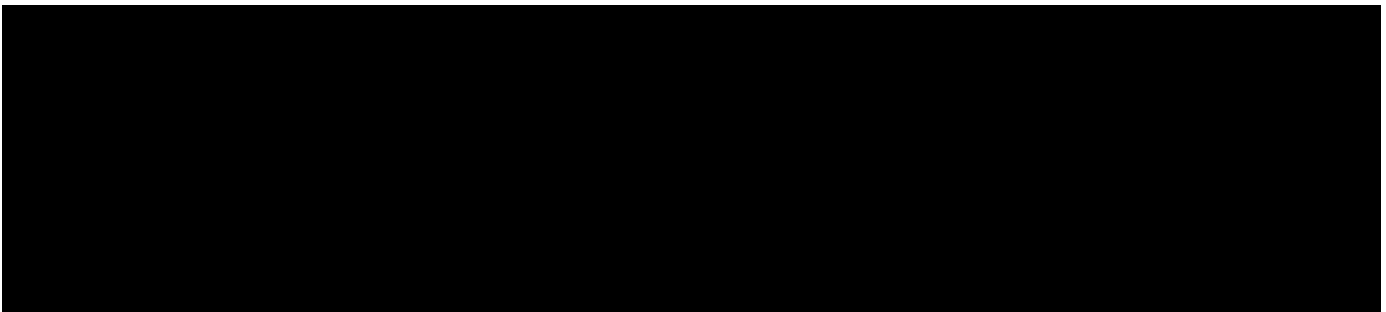
- a. The aims of Thanet Parkway Train Station are to *inter alia* improve accessibility and employment opportunities in Thanet through the provision of Thanet Parkway Station.
- b. There are currently 24 positions for example available at Discovery Park<sup>19</sup>. These are all in the fields of scientist, research, biologist, biochemists and project management<sup>20</sup>.

**12. Adverse Impact By and From The Proposed Development On Attainment Levels Due To Exposure From Aircraft Noise From A Baseline Aircraft Noise Level Of Zero**

- a. We evidence that a 1 dB increase in aircraft noise exposure significantly negatively impacts reading ability. Further, we evidence that reading ability has a considerable impact on both educational attainment and wider life outcomes. As poor reading ability is associated with such profound negative life outcomes, it can have a huge cost to an individual and also to the economy<sup>21</sup>.
- b. We respectfully refer to our submissions to the Second Consultation specifically:
  - i. SoS/R/018 Pages 2- 5; and
  - ii. SoS/R/012 specifically at Page 32, Para BB

**13. Adverse Effect Of Lack Of Need Identified By 4 Independent Experts Since The Examination.**

- a. Clearly for any local people to use airport-related skills in any future job opportunities, the Proposed Development must show sustained economic viability which is predicated on market need.
- b. As you will be aware, since the Examination 4 independent experts agree



there is **no need for the Proposed Development** as evidenced in:

a. [ExA recommendation Report](#).

b. [Independent Aviation Assessor Report](#)

c. [Ramsgate Town Council's independent aviation expert's report](#)

d. [Jenny Dawes' independent aviation expert's report](#)

- c. We respectfully opine that in light of submissions to the 2nd Consultation particularly of Nethercourt Action Group's Independent Aviation Expert and Jenny Dawes' Independent Aviation Expert, that the Secretary of State's [Independent Aviation Assessor Report](#) Conclusion will remain unchanged.

14. Further, we respectfully draw to the attention of the A-T Submissions and to the Secretary of State, our submission to the Second Consultation specifically:

- a. SoS/R/028 Page 6-8 Paragraphs 22-30 in which we evidence the Proposed Development's adverse effect and adverse impact on and to Thanet:
- i. Not realising Strategic Priority 1 and Policy SP04 of Thanet Local Plan
- b. SoS/R/012 Pages 36-44 in which we evidence the Proposed Development's adverse effect and adverse impact on and to Thanet:
- i. Not realising Strategic Priority 1 of Thanet Local Plan (Tourism, Culture, Leisure);
  - ii. Not realising Strategic Priority 2 of Thanet Local Plan (Ramsgate HAZ); and the
  - iii. Not Enhancing and Preserving the Setting of the Ramsgate Conservation Area particularly in light of the new Ramsgate Conservation Area Appraisal.

15. **The harm to employment, skills and training on business, education and employment opportunities in the area by the Proposed Development<sup>22</sup> is**

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<sup>22</sup> Follows Appeal Ref: APP/U1105/W/21/3270077

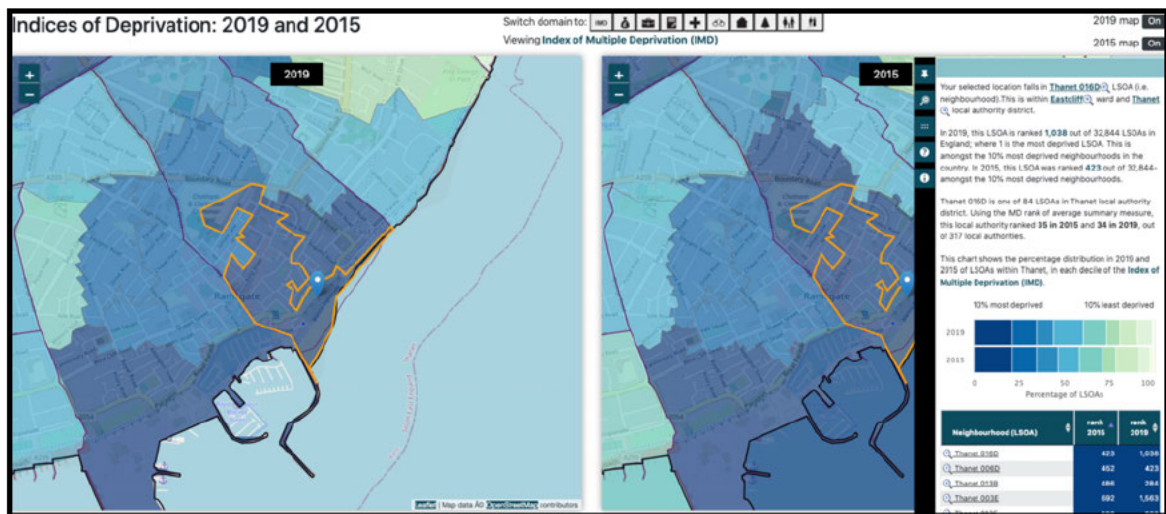
Honiton Cattle Market and Auction Rooms, Silver Street, Honiton EX14 1QN Available online at:

(accessed 3 December 2021)

significant/ substantial and now outweighs any alleged benefits as evidenced above.

### Deprivation : Linked to Our Past

16. We respectfully draw to the attention of the Secretary of State and to the A-T Submissions that during the time of former Manston Airport this LSOA, Thanet, ranked 423 (where 1 is the most deprived neighbourhood) out of 32,844 amongst the 10% most deprived neighbourhoods.
17. **However**, in 2019 and after the airport's closure this LSOA, Thanet, ranked 1,038 (where 1 is the most deprived neighbourhood) out of 32,844<sup>23</sup> amongst the 10% most deprived neighbourhoods.



18. **Clearly there is still a long way to go but as shown by this data the Proposed Development is a step backwards rather than a step to the future and onwards.**
19. The recent awards of the Ramsgate Future Levelling Fund, in addition to the Ramsgate HAZ, Ramsgate Future High Street Funds and the Ramsgate High Street Heritage Action Zone schemes will help drive Ramsgate forward to a better Future as per Strategic Priority 1 and Strategic Priority 2 of Thanet Local Plan. As well as recent private investment (for example the £50 million+ beachside development the Royal Sands<sup>24</sup>).

**Life Expectancy and Deprivation : Proposed Development Increases Risk of Negative Life Outcomes**

20. We respectfully remind the Secretary of State and to the A-T Submissions that a 1 dB increase in aircraft noise exposure significantly negatively impacts reading ability.
21. We respectfully refer to our submissions to the Second Consultation specifically:
  - a. SoS/R/018 Pages 2- 5; and
  - b. SoS/R/012 specifically at Page 32, Para BB
22. Ramsgate and the wider Thanet has had a Baseline Aircraft Noise Level Of Zero for the past 7 years.
23. **We respectfully remind the Secretary of State and to the A-T Submissions that we have evidenced that reading ability has a considerable impact on both educational attainment and wider life outcomes. As poor reading ability is associated with such profound negative life outcomes, it can have a huge cost to an individual and also to the economy<sup>25</sup>.**

**Life Expectancy : Proposed Development Increases Risk of Stroke**

24. We respectfully draw to the attention of the Secretary of State and to the A-T Submissions to the following excerpt has been taken from the recent Civil Aviation Authority update on Aircraft Noise and Health Effects<sup>26</sup>:

*“3.32 Barceló et al published a paper investigating the risk of cardiovascular mortality, stroke and coronary heart mortality associated with aircraft noise in São Paulo, Brazil.*

*3.33 The rationale for the study was that there have been relatively few studies from low and middle-income countries. This study investigated the association*

between day-night average (Ldn) aircraft noise and the risk of death from cardiovascular disease (CVD), stroke and coronary heart disease (CHD) around São Paulo's Congonhas airport, during 2011–2016. The study covered an area that included 3.5 million residents living near the airport, and around 1.5 million of these were exposed to aircraft noise levels above 50 dB Ldn. Of these, 4% lived in areas exposed to > 65 dB Ldn. Data on deaths among the population aged over 20 years old occurring between 2011 and 2016 in the study area were obtained and deaths due to CVD, stroke and CHD were analysed, and covariates such as socioeconomic development, ethnicism, smoking, and noise and air pollution from road traffic, were controlled for.

3.34 The results revealed that areas exposed to the highest levels of noise (>65 dB) showed a relative risk (RR) for CVD and CHD of 1.06 (95% CI: 0.94; 1.20) and 1.11 (95% CI: 0.96; 1.27), respectively, compared to those exposed to reference noise levels ( $\leq$ 50 dB). The RR for stroke ranged between 1.05 (95% CI: 0.95;1.16) and 0.91 (95% CI: 0.78;1.11) for all the noise levels assessed. **The authors found a statistically significant positive trend for CVD and CHD mortality risk with increasing levels of noise ( $p=0.043$  and  $p=0.005$ , respectively). There was no significant linear trend for stroke.** Risk estimates were generally higher after excluding road traffic density, which suggested that air and noise pollution from road traffic are potentially important confounders".

25. It is of note that the values above are **single** noise events and will impact a much larger demographic than shown by the Applicant's noise contours as those values were averaged noise values.

**Life Expectancy : Proposed Development Reduces Protective Effect to Health and Well-Being from Coastal Proximity**

26. We respectfully draw to the attention of the Secretary of State and to the A-T Submissions Chapter 6, of the Chief Medical's Officer Annual Written Report 2021 Health in Coastal Communities which concludes the coast has much to offer with research suggesting that there is a protective effect to health and

wellbeing from living on the coast<sup>27</sup>.

27. It concludes that:

*"There is a considerable weight of evidence that living on or near the coast offers physical health and mental wellbeing benefits. A key contributory factor for good health outcomes is the natural environment, providing spaces and places for recuperation, physical activity and meaningful social contact. The seaside can also provide a context for therapeutic activities to address a range of conditions and needs<sup>28</sup>".*

*"However, the health promoting facets of coastal environments should not be taken for granted. They are threatened by increasingly rapid and human generated environmental change, social and environmental inequalities, poor investment in infrastructure, and a lack of a long-term vision<sup>29</sup>".*

28. Thanet's 15 sandy beaches and bay are long famous for their beauty, this year Thanet has been awarded five international Blue Flag awards and five Seaside Awards. As you will be aware, from the Beach Check UK map below many of our beaches on the Ramsgate side of Thanet (on the map coloured in green and grey).
29. We have evidenced above that the altitude of large cargo planes flying overhead will be about 700 feet over Ramsgate main sands. In addition, the proposed flight paths will hug the coast and beaches from Ramsgate to Broadstairs climbing

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<sup>27</sup> Chapter 6, of the Chief Medical's Officer Annual Written Report 2021 Health in Coastal Communities written by colleagues from Exeter University Available online at:

(accessed 3 December 2021)

<sup>28</sup> Page 227 Chapter 6, of the Chief Medical's Officer Annual Written Report 2021 Health in Coastal Communities written by colleagues from Exeter University Available online at:

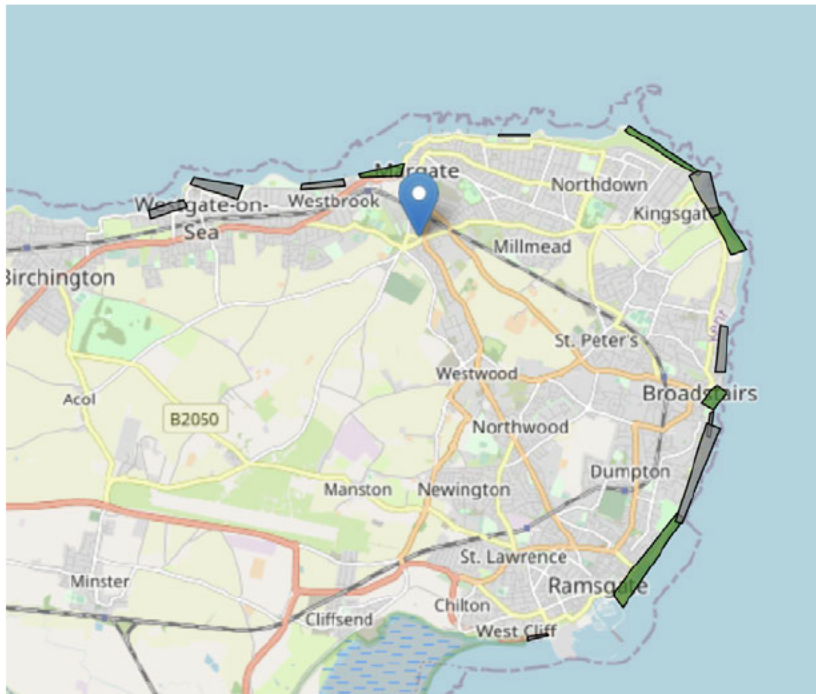
accessed 3 December 2021)

<sup>29</sup> Page 227 Chapter 6, of the Chief Medical's Officer Annual Written Report 2021 Health in Coastal Communities written by colleagues from Exeter University Available online at:

accessed 3 December 2021)



from 1,500 feet<sup>30</sup>.



30. **We respectfully remind the Secretary of State and to the A-T Submissions that the Proposed Development is a threat to the health promoting facets of coastal environments.**

#### **2020 Labour Force Breakdown**

31. We respectfully draw to the attention of the Secretary of State and to the A-T Submissions to the 2020 Labour Force Breakdown<sup>31</sup>:

<sup>30</sup> Applicant's submission to the Civil Aviation Authority known as Aviation Workshop Presentation uploaded to the public on 12 March 2021 Available online at:

<sup>31</sup> [\[redacted\]](#) (accessed on 3 December 2021)  
[\[redacted\]](#) (accessed 3 December 2021)

## 2020 Labour Force Breakdown



32. We respectfully refer to our submissions to the Second Consultation specifically SoS/R/012 Pages 13 - 16 R in which we evidence the local area employment levels and the number of job vacancies and apprenticeships in the local area.
33. **We respectfully remind the Secretary of State and to the A-T Submissions that the Proposed Development cannot be seen as a solution to the demographic labelled "Not in Labour Force" above.**