

# Manston Airport Development Consent Order

## Examination Stage - Deadline 11

### A joint submission by The Ramsgate Society and Ramsgate Heritage and Design Forum

---

#### Introduction

1. In this submission The Ramsgate Society (RS) and the Ramsgate Heritage and Design Forum (RHDF) bring together their concluding arguments in relation to the application by RiverOak Strategic Partners (RSP) to reopen Manston airport as an international hub for air freight.. We do so mindful of the latest information from the applicant's lawyers that contracts have been exchanged with Stone Hill Park (SHP) to purchase by agreement their land holding in the site.
2. Whilst this latest information removes the need for the Examining Authority to satisfy itself on the justification for use of compulsory purchase powers, the planning merits of the applicant's case remain to be tested and substantiated in determining the Authority's advice and recommendations to the Secretary of State.

#### Testing Applicant Assertions

3. In our view the application is founded on five key assertions. These are linked in a logical sequence, and for the DCO to be granted, each and every 'assertion' needs to be substantiated on the basis of sound and objective evidence. The 'assertions' in logical sequence, are as follows:
  - a) There is a current and long term need for greatly increased air cargo capacity within the South-East (and in the UK as a whole);
  - b) That the specific need is best met by a new dedicated air cargo hub (as opposed to other means);
  - c) That Manston is the best site and location in the UK for that air cargo hub;
  - d) That RSP has a robust, sustainable 'stress tested'; business plan that demonstrates that the airport would have short, medium, and long-term commercial viability;
  - e) That the adverse impacts and damage to population health, well-being, educational attainment, natural environment, built environment, heritage assets, culture and economy through noise, air pollution, safety risks and congestion stemming from the planned scale of airport operation are demonstrably outweighed by local, regional and national benefits.

4. In the course of the Examination Stage there has been an enormous amount of written and oral evidence produced by the applicant and its advisers, SHP and by interested parties supporting and challenging these key assertions. These together with oral and written cross-examination of the Applicant by the ExA overwhelmingly demonstrate that each of these 'assertions' has no validity in the face of the evidence.

### Risk and Uncertainty

5. In our Written Representation we highlighted the significant difference between this and other DCO applications, in particular the inherent high level of risk and uncertainty. It would be a highly speculative, private sector start-up operation requiring substantial capital investment to develop and operate. This operation is highly sensitive to, and predicated on strongly disputed forecasts of dedicated air cargo traffic, produced by a consultant with no airport planning experience. They have been heavily criticised as being grossly optimistic when scrutinised by every other independent authoritative source and yet they are the flimsy foundation on which the subsequent scale of site development plans are based.
6. Compelling evidence and arguments have been advanced by interested parties and their retained experts highlighting a range of risks and uncertainties surrounding the applicant's scheme, for example:
  - a) There is no recognisable business plan by which to gauge the viability of the commercial operation;
  - b) Widely and vigorously disputed RSP forecasts of future dedicated air freight demand on which the project is predicated;
  - c) There are efficient, well established, expandable air cargo competitor airports;
  - d) Manston would have stiff competition for market share, including from East Midlands, Stansted; and the expanded Heathrow
  - e) The likelihood of very high start-up costs coupled with any potential returns being at best very long term
  - f) Uncertainties about scale, origin, reliability and sustainability of funding sources over the short, medium and long term especially given the high level risk that potential investors would perceive;
  - g) Past record of serial failure of Manston as a commercial airport to an extent due to inherent unattractiveness of the location to serve regional and UK-wide markets

### Land Acquisition

7. On 3<sup>rd</sup> July it was announced that RSP have now agreed terms with SHP for the purchase of the land therefore obviating the need for a compulsory purchase order should the DCO be granted.
8. Financing the land acquisition is a relatively easy thing to do as RSP are acquiring a valuable asset with alternative uses if their aviation proposals fail. From that point of view this is a low risk acquisition for RSP. However the acquisition of the land represents less than ten percent of the total funding required to finance the start up and operational needs of their proposals. So far the Applicants have singularly failed to provide the Examining Authority with sufficient reliable and verifiable evidence that would meet with the standard of evidence required.
9. We respectfully remind the Examining Authority that having regard to the scale and extent of the operations proposed this change of ownership does not remove the need for a DCO which still requires the Applicant to demonstrate that the proposal is in the national interest. To do this the Applicant must satisfy the Examining Authority and the Secretary of State that the proposal is “**Sound**” meaning that there is a demonstrable **Need**, that the proposal is **Evidence Based**, that it is **Deliverable** and that it is **Environmentally Sustainable**.

#### Impact

10. If the airport did go ahead in accordance with RSP plans then the impact of the proposal on Ramsgate would be disastrous in terms of noise and disturbance with severe implications for both health and well-being, and future investment needed to support the heritage and local economy, contrary to the aims of the recently designated Heritage Action Zone and the draft Local Plan. .
11. The forecast of new employment to arise directly and indirectly from the airport’s use, which the applicants claim mitigate these adverse effects, is grossly overstated and without credibility. It was thoroughly discredited by an expert on behalf of SHP at the June 2019 Special Hearings.
12. The omission of the airport as a key brownfield site for housing and mixed use development from the final draft of the Local Plan for Thanet places increased pressure on greenfield sites on the urban fringe, perpetuating piecemeal and unsuitable developments. Moreover it places additional strain on Thanet’s ability to meet its housing targets which is of concern to the Secretary of State James Brokenshire evidenced by his letter of 28th January 2019 to the Leader of Thanet District Council
13. The designation by Historic England of Ramsgate in 2017 as one of the first ten areas to be declared a Heritage Action Zone (HAZ) was much welcomed by all parties with an interest in the town’s future. The status recognises the exceptional quality of the historic built environment of the town, that it is at risk in an economically deprived, but also that it is potentially a very valuable asset by which to boost the local economy.

14. Through the Heritage Action Zone (HAZ) initiative HE is looking to unleash the potential in Ramsgate's historic environment to create economic growth and improve the quality of life for local residents. The Ramsgate five-year HAZ programme aims to regenerate the local economy by capitalizing on its rich maritime heritage and historic environment.
15. The Society and other volunteers working with Historic England have recently completed a detailed assessment of Ramsgate's four Conservation Areas which is intended to provide evidence for grant applications to improve the quality of some of the buildings and public realm that underpin the attraction of the town as a tourist destination. If the airport was to come into operation, with its close proximity to the town, with its associated noise, air pollution, and visual intrusion then potential funders and grant awarding bodies would no longer look favourably on Ramsgate as worthy of investment since benefits would immediately be eroded by negative impacts of the airport, thus reinforcing a spiral of decline. The airport would kill tourism in general and regeneration via heritage in particular.
  
16. . Given the weakness of the DCO case by the Applicant, and the strength of evidence tabled by the opposition the DCO must be refused.

John Walker, Chair, The Ramsgate Society

Richard Oades, Vice Chair, The Ramsgate Society

Nigel Phethean, Ramsgate Heritage and Design Forum

4<sup>th</sup> July 2019