

Ref: TR020002

Re-determination of the Application by RiverOak Strategic Partners Limited for an Order granting Development Consent for the reopening and development of Manston Airport in Kent.

Consultation on the Independent Aviation Assessor's Draft Report and the Representations Received on The Statement Of Matters

Submission by The Ramsgate Society

MANSTON RE-OPENING WOULD THREATEN EXISTING HERITAGE, ECONOMY AND INVESTMENT



Figure 1 Manston runway, and beyond nearby Ramsgate and the sea.
(copyright Cargo Airports & Airline Services [CAAS])

Independent Assessor Report

We have carefully considered the report of the Independent Assessor (Ove Arup & Partners) and we do not depart from any of its conclusions. In response to the brief, and as one would expect from such a renowned firm, it has delivered a thorough, rigorous, evidenced analysis from which it draws logical, reasoned conclusions.

We note with concern that in early responses in the media RSP and supporters have sought to discredit Arups rather than address the issues in question.

Assets and investments at risk

The Ramsgate Society has engaged in the debate about the reopening of Manston airport since 2017. On the basis of our own research at that time the evidence was conclusive that there is no 'need' for the airport given current and future capacity at existing airports that are far better located to serve the country. Following an exhaustive inquiry, that too was the unequivocal conclusion from the Planning Inspectorate in 2019, as well as every other independent aviation consult's report. Two years on, that has again been confirmed by the Independent Assessor.

The Applicant and proponents of the airport have argued the case on the ground of alleged local economic benefits especially employment. They conveniently overlook the fact that if there is no commercial need for the airport, there would not be a viable business and therefore there would be no jobs.

We draw your attention to two strands of **new evidence** relating to Ramsgate that further exposes the disbenefits that should be weighed in the redetermination. They throw a fresh spotlight on what is under threat and at risk.

We need to be reminded of the nature of the threat before considering what is at risk. The location, orientation and proximity of the airport in relation to Ramsgate is highly problematic .

The aerial photo, Figure 1 Illustrates just how alarmingly close the end of the runway is to Ramsgate and that the orientation of the runway is such that every landing approach from, and departure to, an easterly direction would directly overfly the breadth of the town from Nethercourt to the Royal Harbour. Ramsgate is so close that landing and departure procedure would not allow any deviation from that alignment.

RSP misled the EIP and Planning Inspectorate by stating that Ramsgate is 4 km from the end of the runway and it has continued to tout that figure at every other opportunity. We suspect that RSP knowingly exaggerated the distance between urban Ramsgate and the runway in order to manipulate public perception and minimise opposition to the proposal.

We tabled accurate figures in earlier submissions; however, the RSP figure has been innocently and unwittingly quoted by others, including Arup. Reference to the relevant OS map (see Figure 2) reveals the true distances, viz:

- The Nethercourt estate is a mere 1.3 km from the eastern end of the runway
- The built-up area of Ramsgate extends a further 2.7 km to the sea, ie 4 km from the eastern end of the runway.

All things being equal, the levels of disturbance, damage and pollution from Air Traffic Movements (ATMs) are a function of the altitude of the aircraft above the area being overflown. That altitude is in turn a function of the distance from touchdown (or take-off).

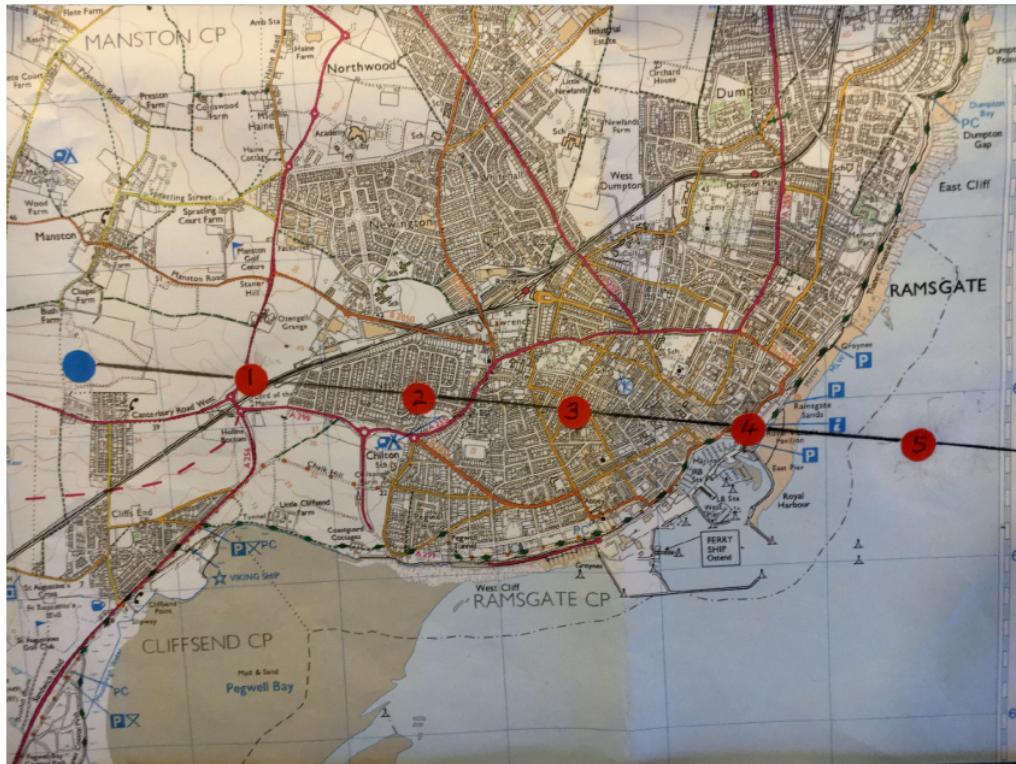


Figure 2 An annotated map of Ramsgate (extract from OS Sheet 150, copyright OS) Key: **Red dots** mark kilometre distances from the end of the runway on the approach alignment. **Blue dot** marks the eastern end of the runway.

We here compute the altitude of aircraft on landing approach to Manston using the standard aviation sector method:

Key parameters on landing approach

1. Direct alignment with runway 10 kilometres from touchdown
2. Glidepath 3 degrees (ie rate of descent 5.2%);
3. Height crossing runway threshold on approach 15 metres;
4. OS Spot height of Manston runway above MSL (Mean Sea Level) 50 metres

Landfall would be 4 km from the runway over the Royal Victoria Pavilion/Clock House then over-flying Harbour Parade, Harbour Street, Ramsgate Library, Chatham & Clarendon Grammar School, and on continuous descent over the town to Nethercourt.

The distance from the runway threshold (measured from OS Sheet 150) and heights at key locations:

- Royal Victoria Pavilion/Clock House/ Harbour Parade 4.0 kilometres height **900 feet (c270m)**
- Chatham & Clarendon Grammar School / Public Library 3.4 km; height **700 feet (c220m)**
- Nethercourt at nearest point 1.3 km, height **270 feet (c 80m)**

The aircraft on that heading and glide path would typically be a Boeing 747-400, the predominant dedicated cargo type globally. These enormous aircraft have a wingspan 206 feet (64 metres), and a length of 228 feet (71 metres).

The impact of low flying aircraft depends too on 'what lies beneath' - what is being overflown.

New and recent evidence of Assets and Investment

There are two strands of **new evidence** relating to Ramsgate that further expose the disbenefits that should be weighed in the redetermination. They throw a fresh spotlight on what is under threat and at risk.

- Conservation Area Appraisal Report by Historic England
- Public and private sector investment projects and programmes

Heritage

In 2017 Historic England (HE) signalled its recognition of the national importance of Ramsgate heritage as well as its vulnerability by designating the town as one of only five Heritage Action Zones (HAZ) in the South East Region. A 5-year programme of work has ensued. The town has four conservation areas (CAs). The Central CA has the greatest concentration of heritage assets and was, in 2018, chosen by HE as the subject of a Conservation Area Appraisal (CAA). A CAA is a tried-and-tested technique developed by Historic England and applied at various heritage-rich locations across the country. The consequent Conservation Area Appraisal Report (currently in Consultation Draft dated August '21) runs to 483 pages. It covers the Central Ramsgate Conservation Areas (see Figure3). The report marks a milestone in understanding the nature, scale and value of individual heritage assets and their collective significance from a local, regional and national perspective.



Figure 3. Ramsgate (Central) Conservation Area (source: TDC website)

The report is in three main parts:

1. Character appraisal
2. Conservation Area Management Plan
3. Guidance for carbon reduction and climate change adaptation

In the Summary of Special Interest the report states (p5):

“Ramsgate Conservation Area is of exceptional historic and architectural interest as a coastal resort town and working harbour with a fine array of heritage assets spanning the seventeenth to the twentieth century, representing a complete cross section of the society which lived, worked and visited Ramsgate over more than three centuries of growth and change.”

Historic England identified 13 character areas within the Conservation Area (see Annex). Of these ‘Royal Harbour’ is described as follows:

“The Royal Harbour is a remarkable piece of eighteenth-century civil engineering of national importance both for its design and its role in national and international trade during the eighteenth- to twentieth centuries. There is great significance not only in the surviving eighteenth- and nineteenth-century harbour infrastructure, but also in the harbour’s continued use. The harbour arms allow extraordinary views back inland, in which the historic growth and exceptional historic building stock of Ramsgate can be understood.” (RCAAR, p5)

The ‘Royal Harbour’ ‘character area’ is **directly beneath the flight path** to and from Manston (comparing Figures 2 and 3).



Figure 4. Ramsgate Royal Harbour and a HE ‘character area’ (c Property Market Index)

ALERT : directly under the flight path



Figure 5 View east along Harbour Parade (RCAAR, p79)

Referring to Figure 5, the Grade 2* Clock House is on the right. Royal Victoria Pavilion in the centre, Harbour Parade is directly on, and aligned with, the flightpath. Aircraft on descent would be at an altitude of around 800feet from where the photo is taken.

ALERT : directly under the flight path



Figure 6: The Royal Victoria Pavilion looking east (RCAAR, p93)

ALERT: directly under the flight path

The Georgian obelisk and Royal Harbour Pavilion are directly on the landing approach and would be overflowed at an altitude of 900 feet (270 metres). The Grade 2 Listed Pavilion was recently the subject of a £4.5m refurbishment.

Public and Private Sector Investments and Initiatives

After many years in the doldrums Ramsgate has, slowly but surely, begun to blossom as a place to live, work and visit. In November 2020 Property Market Index ranked Ramsgate as the Number One seaside town for London buyers moving to the coast (propertymarket-index.com). There have been major private sector investments in the visitor and tourist economies in recent times and in the last year or so a flurry of public sector grants and initiatives that signal both need and potential. Thanet is as an area with high levels of deprivation, high unemployment and low skills and, as such, has secured substantial government funding in 2021. Within Thanet, Ramsgate has been awarded the highest level of funding in recognition of its needs and assets.

The prospect of frequent low flying giant cargo planes over-flying the town would jeopardise all the benefits from those public and private sector investment.

We here outline those investments and initiatives currently under threat from a reopened Manston.

Public sector

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 considers the priorities of local people and reflects the changes they would like to see.

The Ramsgate Future Investment Plan will align with and build upon other programmes, including the Future High Street Fund bid (FHSF) and the Heritage Action Zone (HAZ) programme. It will make the most of the town's assets and deliver a shared vision to transform and regenerate the town. It will build on funding from the Future High Street Fund and High Street Heritage Action Zone to:

- Create new and better employment;
- Enable local people to develop new skills for the economy of the future;
- Support local businesses to grow;
- Improve connections and make it easier to get around;
- Celebrate and invest in our Seafront, History and Heritage.

ALERT: directly under the flight path

Ramsgate High Street Heritage Action Zone

In March 2021 the town was awarded a grant of **£601.9k** from the HE High Street HAZ fund. This will enable Improvements to Ramsgate's town centre will include the transformation of some of the historic buildings on Harbour Street as well as repurposing empty buildings on the lower High Street for creative and community use over the next three years. Work began immediately with public engagement and the finalisation of the scheme's project development plans. The funding is being used as follows:

- on a capital works programme on Harbour Street to restore and revive the unique historic character of the area.
- Improving the public realm,
- generating positive publicity to Ramsgate town centre, hosting events and strengthening the community's sense of identity and purpose.
- marketing of historic premises to bring them back to beneficial use;
- generating jobs
- supporting cultural activities that engage communities in Ramsgate, celebrating the local character and heritage.

ALERT : directly under the flight path

Future High Street Fund

In May 2021 funding of **£2.7million** was awarded under a set of very specific criteria to support two projects:

- To provide more workspace in the town centre for creative industries to improve the street scene and bring empty buildings back into use.
- To fund highway improvements in order to improve the public realm and create better connectivity between the Royal Harbour and the Town centre

ALERT : directly under the flight path

Levelling Up Fund:

In October 2021 the Levelling Up Fund awarded **£19.84 million** to Ramsgate There are three components to the programme:

- Green Port Ramsgate.
 - First stage investment in Port Infrastructure to create a Green Port that will provide a hub for innovation and 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.
- The Royal Harbour.assets

- 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 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.
- 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 Clock House (Listed Grade 2*) will create a new town square, as well as connecting projects and reducing congestion within the town centre.

ALERT : directly under the flight path

- Assets to Connect to Opportunity.
 - Investment in two community access points including central Ramsgate
 - provide spaces for people to access career development. Provision of training kitchens, community teaching space, information exchange, and operational space existing local charities

ALERT : directly under the flight path

The Key Performance Indicators associated with this Levelling Up programme include:

- 20% of Thanet visitors actively looking to visit Ramsgate
- 25% increase in footfall at the Royal Harbour

ALERT : directly under the flight path

Infrastructure Investment: Thanet Parkway Station :

The new Thanet Parkway Station will open in 2022. It lies 1.5km WSW of Ramsgate,. It has been publicly funded at a total cost of **£34.5m** of which £14m is from the *Local Growth Fund*, and £12m from the *Getting Building Fund*.

The station will have parking spaces for almost 300 cars and will serve commuters travelling out of the area to work in Dover, Canterbury, Ashford, Ebbsfleet and Central London.

The business case for the station was drawn up before the intervention of RSP and referenced Stone Hill Park's plans for a residential and business mixed use development on the Manston airport site as well as serving nearby Discovery Park. The intervention by RSP has undermined that business case while offering no compensatory benefits. There is no rail freight facility in or near Thanet: the nearest freight terminal is at Ashford where freight routes link to the Channel Tunnel.

Private Sector: Recognition, Support and Investment

We have already highlighted the prominence and value that Historic England ascribes to Ramsgate as a whole, and to the central Conservation Area in particular as evidenced by the comprehensive Appraisal report.

Recognition has not been confined to the public sector. Two examples of private sector investment illustrate faith in the assets and opportunity Ramsgate has to offer:

At the eastern end of Harbour Parade, overlooking the Main Sands is Royal Victoria Pavilion (see Figure 6), a magnificent listed building restored by Wetherspoons at a cost of some **£4.5m** and opened as a pub and restaurant in 2018. It and the beaches it fronts sit directly under the flight path.

ALERT : directly under the flight path



Figure 7. 'Royal Sands' development: apartments, hotel, retail and leisure. (with Royal Victoria Pavilion to the left) artists impression construction currently around 50% complete

ALERT : directly under the flight path

To the north side of the Royal Victoria Pavilion (well within the wingspan of a jumbo jet) is the 'Royal Sands' development. It is a massive redevelopment of the long vacant and former Pleasurama site on Marina Esplanade. The **£50m** development is aimed squarely at the tourist market. It is situated on the sea front and will include 106 luxury apartments, a high-end hotel and leisure and retail units. This is a milestone project signaling private sector developer confidence in the town that can only serve to inspire confidence in others. Alongside other regeneration projects this will provide a significant economic boost to the area.

The spectre of Manston reopening puts each of these projects in jeopardy. The frequent noise disturbance and visual intrusion will deter any further significant investment in the tourist and visitor economy by the private sector.

Conclusions

It is conspicuous that none of the projects, plans or programmes associated with the funding makes any reference to Manston reopening as an air cargo hub, Nor would they benefit, indeed Manston would severely threaten potential benefits. If it did reopen it would deal a fatal blow to the growing visitor economy and heritage tourism of Ramsgate. **The Royal Harbour is the 'jewel in the crown'** of East Kent as signalled by Historic England. The benefits of this public sector investment would be negated if the airport were to be reopened. The major improvements to the historic Harbour and High Street environment designed to enhance the visitor experience and bolster the tourist economy would be more than cancelled out by the passage of frequent low flying noisy and polluting cargo planes **directly overflying** the very streets and harbour in which the investment has been made.

Incoming and departing cargo planes would overfly at low altitude the residential commercial and historic heart of Ramsgate. The flightpath is aligned with Harbour Street and the High Street, the focus of High Street HAZ public investment. Continuing eastwards to Harbour Parade alongside the historic Royal Harbour and central to the Levelling Up grant of £19.84m awarded in October with a pedestrianisation and town square regeneration scheme to boost the visitor economy and the quality of life for residents. The targets to increase visitor numbers to Ramsgate and footfall around the Royal Harbour would become a pipedream

Ramsgate has, as the Appraisal testifies, heritage assets of national importance that are the key to the growing sector of heritage tourism. The epicentre of those assets is under the threat of low flying cargo jets.

The airport reopening would signal a spiral of decline in Ramsgate affecting the visitor economy, heritage tourism, culture, and quality of life in the town just at a time when it has begun to exhibit self-generated 'green shoots' of recovery and newly infused with optimism generated by outside recognition of its merits and the financial assistance to help meet its needs. The threat is very real, and for what?

Reopening Manston would perpetrate an act of corporate vandalism on the town for the sake of a commercial folly.

ANNEX

Abstract from "Conservation Area Appraisal Report - consultation draft, AAR, August 2021, pp5-6, Historic England

Overview of the Conservation Area

Summary of Special Interest

The Special interest can be broken down into the following key elements

⌚ **A place built to appreciate views of the sea and sunlight.** Ramsgate is special for the well-preserved eighteenth, nineteenth and twentieth-century seaside resort developed with fashionable housing, guest houses, hotels, public gardens and promenades running along clifftops to exploit the dramatic, south-east facing views

over the English Channel and the 'amphitheatre' of the Royal Harbour. The area has a unique skyline of special architectural interest in views back from the harbour and sea.

⑦ **The Royal Harbour.** The Royal Harbour is a remarkable piece of eighteenth-century civil engineering of national importance both for its design and its role in national and international trade during the eighteenth- to twentieth centuries. There is great significance not only in the surviving eighteenth- and nineteenth-century harbour infrastructure, but also in the harbour's continued use. The harbour arms allow extraordinary views back inland, in which the historic growth and exceptional historic building stock of Ramsgate can be understood.

⑦ **Eighteenth and nineteenth-century resort development.** The residential areas beyond the town centre are defined by a remarkable survival of eighteenth- and nineteenth-century terraced housing and villas, as well as shops, public houses, places of worship and light industrial works, which is almost unique on a national scale. These neighbourhoods provide a complete cross section of the society which lived, worked and visited Ramsgate during its heyday as a coastal resort, which is of fundamental significance to the character and appearance of the conservation area. The network of alleyways, ginnels and passages which criss-cross these neighbourhoods, as well as the historic town centre, are significant in breaking down the urban grain, enhancing pedestrian access across the conservation area and creating picturesque, channelled views.

⑦ **Network of squares and gardens.** The conservation area is a focus of genteel eighteenth- and nineteenth-century residential squares, lawns and crescents. These spaces are of historic interest as a fundamental part of the planned formal development of eighteenth- and nineteenth-century Ramsgate, but also provide enclosed, tranquil spaces which relieve the hard, urban townscape and are often of intrinsic aesthetic value. Large, mature street trees or trees in private gardens which are prominent in views also play an important role in softening the hard, urban townscape.

⑦ **Cliff-top promenades.** The cliff-top promenades are a very important feature of Ramsgate's special interest and provide evidence of the evolving national trends and fashions in seaside leisure and recreation through the surviving structures and spaces. These wide, open spaces are lined with set-piece buildings, many of great architectural and historic interest. The length and accessibility of the cliff-top promenades facilitates stunning views out to sea and across the working harbour, which change in character throughout the year.

⑦ **Pre-resort town survivors.** The town centre contains many significant heritage assets which pre-date the growth of Ramsgate as a fashionable resort and provide a sense of the town's relative prosperity from sea trade during the seventeenth and eighteenth centuries. The early-eighteenth-century brick and flint houses with Dutch gables are particularly significant in this context. This collection of buildings places Ramsgate in a national context of expanding international and national naval commerce during the seventeenth and eighteenth centuries

⑦ **Public buildings and works.** The conservation area includes many examples of public works which testify to the civic pride and confidence of Ramsgate during the nineteenth and twentieth centuries, and which span a very wide range of architectural styles and building types that were popular at different times during this period. This includes major infrastructure projects like Royal Parade and Military Road, as well as grand public buildings like St George's Church and the Clock House. Historic street surfaces and furniture, where it survives, greatly enriches the streetscape and complements the architectural and artistic interest of the historic buildings in the area.

⑦ **High quality of undesignated buildings and structures.** Many buildings in the conservation area are not listed, but share the fine-grained architectural detailing, extensive use of vernacular materials (especially flint) and historic interest as their listed neighbours. The high quality of the 'ordinary' building stock in Ramsgate means that almost every street is rich in texture, detailing and historic interest. This is a fundamental part of the special character of the conservation area.

⑦ **Evocative street names.** Street names within the conservation area have very strong associative power and locate the development of Ramsgate in a specific time and place. The town's association with the Napoleonic Wars and Regency high society is particularly pronounced, with names such as Nelson Crescent, Plains of Waterloo and Liverpool Lawn. Street names are often given on historic street signs, either of stone or iron, which add to the richness of the townscape.

