

Written summary of oral submission presented to Manston Airport DCO Examining Authority

Submitted by Jason Jones-Hall, Local resident and business owner

Date of Hearing: Preliminary Meeting, 9th January 2019

Please note that evidence to support this submission has been presented in Appendix A, attached, with corresponding reference numbers, as noted in the body of this submission, printed in the top right corner of each item and highlighted text where appropriate.

Re: Agenda Item 3: List of Principle Issues

First of all, I would like to thank the Planning Inspectorate and Examining Authority putting together such a well-considered list of Principal Issues which, for the most part, is very thorough indeed.

There are a few areas, however, where I would like to respectfully suggest some omissions may have been made and/or where a minor rewording might be considered in order to address any unintentionally implied bias in the current wording.

So, if I may, I would like to take this opportunity to look first at some suggested minor rewording of a couple of items in Annex B, as follows:

Annex B, Pg. B4: Socio-economic Issues (ii and iii)

I wish to express strong concerns of implied bias and a request to reconsider the wording with regards to **items (ii) and (iii)**, namely “**Estimates of employment generation**” and “**Scope for local employment**”. These issues cannot be taken in isolation without also discussing effects and estimates of job losses due to the detrimental impact of the proposed development on local trade and economy and/or displacement activity both regionally and nationally. I would suggest a rewording along the lines of “**Net impact on employment**”

Annex B, Pg. B4: Socio-economic Issues (vi)

Here, again, there are concerns of implied bias with regards to the phrase “Community Benefits”. This should be more appropriately reworded as “**Community Impact**” to also assess the significant negative effects on the community, as expressed in the vast majority of public representations to the Planning Inspectorate.

CLIMATE CHANGE AS A PRINCIPLE ISSUE

As the Examining Authority will be aware, the National Planning Policy Framework identifies an environmental objective as one of three overarching objectives. Further, a fundamental principle of the National Policy Statements is that they must “*include an explanation of how*

the policy takes account of government policy relating to the mitigation of, and adaptation to, climate change". (JJH01).

I wish to express concern that the effects of the applicant's proposal on the achievement of sustainable development, including the mitigation and adaption to climate change, are not listed as **specific principle issues** and rather the Examining Authority will merely "*conduct all aspects of the examination with these objectives in mind*".

This runs the risk of taking a **passive** approach to climate change as a secondary issue, de-prioritising climate change and sustainable development. This is not consistent with the recommendations of the Committee on Climate Change Adaption Sub-Committee (JJH02) or with the National Planning Policy Framework, which calls for a **positive** and **proactive** approach.

In light of the very real and potentially catastrophic impact of the proposed cargo hub and resulting significant increase in HGV traffic on the environment, I would like to request that the Examining Authority should revisit this decision and consider the Committee for Climate Change's recommendation that "*the Government should consider how the planning system can enable decision-makers to explicitly weigh-up the long-term costs of climate change impacts against the social and economic benefits*". (JJH02)

OMISSIONS

Annex B, Pg. B1: Compulsory Acquisition

Significant concerns have been raised by many objectors to the applicant's proposal, including by the current landowners, with regards to the lack of experience of the applicant in developing or operating an airport and questions raised as to whether the applicant is "*using the DCO process as a ruse*" to obtain the site. (Pinsent Mason's Relevant Representation to UK Planning Inspectorate on behalf of Stonehill Park, JJH03, Pg2, Para 1.4), or a "land grab", if you will.

Further, as the applicant's own legal team pointed out in October last year, the *UCL/NIPA 2016 Research Project into Infrastructure Delivery and the DCO process in Context* (JJH04) found that of the 50 DCO projects approved at the time, only 7 had been built, 13 were under construction and 30 - or 60% of approved projects - had not even started yet or had been abandoned altogether, 6 and half years after the regime had been in operation.

As such, I respectfully submit that an additional item be added to the Principal Issues under Compulsory Acquisition to cover [Crichel Down Rules](#) and/or what happens to the land in the event that the DCO is granted and the air cargo hub development does not materialise as

promised by the applicant. This is of significant public interest, in particular given the substantial loss of much-needed housing land in the region. Please also see letter from the Secretary of State for Housing, Communities and Local Government to Thanet District Council, in which it is made clear that “*there is a high housing pressure*”, (page 2, paragraph 3, [JJH09](#)).

Annex B, Pg. B2: Funding

(Picking up on the viability point) Can we clarify whether the term ‘funding’ here refers to assessment of how the applicant will pay for the proposed infrastructure project over its lifecycle as opposed to ‘financing’ of the upfront costs, as defined by guidance issued by the Institute for Government. ([JJH05](#))

Given the significant opportunity cost of taking the land from the current owners and impact on local housing planning and policy, we cannot afford to abandon other viable options merely in the speculative hope that the applicant might deliver on its promises. There must be a robust scrutiny of the applicant’s initial financing, its funding over the entire lifecycle of the project and its ability to deliver on its business plan.

Annex B, Pg. B2: Funding, (items iii-vi)

The applicant has included in its application estimates of indirect and catalytic economic benefits, such as alleged indirect and catalytic jobs created, but has failed to acknowledge any indirect or catalytic costs. As such, I respectfully request that **indirect and catalytic costs must be considered** and should be added here as an additional Principal Issue. For example, this should include **Increased costs to public purse of healthcare and mental healthcare provision** to deal with the considerable healthcare impacts of the proposed development on the local community.

Annex B, Pg. B2: Funding (new item)

In light of the conflicting information relating to the Applicant’s public announcement that it has acquired the Jentex fuel site on 18th September 2018, ([JJH06](#)) and the Land Registry which, as of 3rd January 2019 and last updated on 16th October 2018, shows the site to still be owned by the Jenkins family, ([JJH07](#)), please add an additional Principal Issue to this list to cover **Funding issues relating to the purchase of the Jentex Fuel Site**.

Annex B, Pg. B2: Landscape, Design, Archaeology and Heritage

Can we clarify whether Landscaping and planting schemes will also cover **The effects on outdoor and recreational areas**, for example Ellington Park, which was awarded a £1.64m development grant from the Heritage Lottery Fund in December 2018 ([JJH08](#)), with development work due to start in summer 2019. Ellington Park lies directly under the flightpath and less than 2.5 miles from the end of the runway.

Annex B, Pg. B3: Local Policy

An additional Principal Issue should be added to specifically address the **extraordinary circumstances relating to local policy and Thanet District Council and history of dispute regarding the Manston site**, including Elected Councillor's actions with regards to the Manston site and the draft Local Plan resulting in the Secretary of State for Housing, Communities and Local Government confirming Intervention Measures from his department and commenting specifically on Thanet District Council's, (TDC's), *"persistent failure over many years and under different administrations to get a Local Plan in place"* and refusing to accept TDC's justification for this as being due to *"the local debate over the future of Manston Airport"*. (JJH09)

Annex B, Pg. B3: Need (ii)

The agenda here should be extended to make specific reference not just to current and future market size and demand, but also to **competition and displacement with regards to other recent and proposed airport developments, e.g. East Midlands, Luton, Southend, Stansted, Gatwick and of course Heathrow.**

Annex B, Pg. B3: Noise

A new Principle Issue should be added to cover **issues relating to the applicant's noise sampling and baseline methodology.**

A new Principle Issue should be added to cover **Assessment of the effects on outdoor recreational areas**, (e.g. Ellington Park, school playgrounds), and difficulties in providing noise mitigation for such areas.

Annex B, Pg. B3: Operational Issues

Can we please clarify whether item (vi), Safety, will also include **Security, Customs and Border Control issues** and if not whether these issues might be added to the Principle Issues specifically in relation to a 2 year old startup company with no track record, 90% Belize ownership and no identified persons with significant control.

Annex B, Pg. B4: Socio-economic Issues (iv)

Given the project has been proposed on the basis of National Significance, the effects of other proposed airport developments should be broadened out to include **cumulative effects of other airports across the whole of the UK** as opposed to regional effects only in the South East.

Given the recent news and the focus on freight, **cumulative effects of developments with Ramsgate Port and with Seabourne Freight** should also be specifically referenced here.

Annex B, Pg. B4: Socio-economic Issues (new item)

A new Principle Issue should be added to cover the **Effects of loss of housing land for the airport development** and impact of potential influx of airport workers on demand for local housing.

Annex B, Pg. B4: Traffic and Transport (vi)

Please add to item (vi), **The effects of Operation Fennel**.

Annex B, Pg. B4: Traffic and Transport (new item)

Please add **Risks and mitigation of Thanet Parkway station development and level crossing not proceeding** given that the proposed station is yet to be approved and funding and finance has not yet been secured. Also impact and implications of **Freight and National Passenger Operators Route Strategic Plan**, (February 2018), which runs until 2024.

APPENDIX A: SUPPORTING EVIDENCE

**In support of written summary of oral submission presented to Manston Airport DCO
Examining Authority**

Submitted by Jason Jones-Hall, Local resident and business owner

Date of Hearing: Preliminary Meeting, 9th January 2019

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National Infrastructure Planning

Cymraeg

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Enquiries: 0303 444 5000

National Policy Statements

What are National Policy Statements?

National Policy Statements are produced by government. They give reasons for the policy set out in the statement, and **must include an explanation of how the policy takes account of government policy relating to the mitigation of, and adaptation to, climate change.** They comprise the government's objectives for the development of nationally significant infrastructure in a particular sector and state, including:

- How this will contribute to sustainable development.
- How these objectives have been integrated with other government policies.
- How actual and projected capacity and demand have been taken into account.
- Consideration of relevant issues in relation to safety or technology.
- Circumstances where it would be particularly important to address the adverse impacts of development.
- Specific locations, where appropriate, in order to provide a clear framework for investment and planning decisions.

They also include any other policies or circumstances that ministers consider should be taken into account in decisions on infrastructure development.

National Policy Statements undergo a democratic process of public consultation and parliamentary scrutiny before being designated (ie published). They provide the framework within which Examining Authorities make their recommendations to the Secretary of State.

Which sectors do National Policy Statements cover?

There are 12 designated National Policy Statements (NPS), setting out government policy on different types of national infrastructure development, which are:

Energy NPSs

- NPS for Overarching Energy (EN-1)
- NPS for Fossil Fuels (EN-2)
- NPS for Renewable Energy (EN-3)
- NPS for Oil and Gas Supply and Storage (EN-4)
- NPS for Electricity Networks (EN-5)
- NPS for Nuclear Power (EN-6)

These were produced by the former Department of Energy and Climate Change (DECC), now the [Department for Business, Energy and Industrial Strategy \(BEIS\)](#). All six energy NPSs received designation by the then Secretary of State for Energy and Climate Change on 19 July 2011. [Energy NPSs can be viewed on the GOV.UK website.](#)

Transport NPSs

- NPS for Ports
- NPS for National Networks
- Airports NPS

In this section:

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Committee on Climate Change
Adaptation Sub-Committee

17 October 2011

Rt Hon Greg Clark MP
Minister for Planning, Department of Communities and Local Government
Eland House, Bressenden Place
LONDON SW1E 5DU

Dear Greg

Adaptation Sub-Committee's Advice on Draft National Planning Policy Framework

I am writing to summarise the Adaptation Sub-Committee's (ASC) advice on the draft National Planning Policy Framework in response to your Department's consultation. When I met with Richard McCarthy, the Director General with responsibility for planning, he suggested that I write to you setting out the implications of the ASC's work for the draft National Planning Policy Framework.

Results to date

The ASC's first report¹ identified the importance of the land use planning system for adaptation. It highlighted that planning decisions can directly help to increase resilience to climate risks such as flooding and drought, but can also lock future generations into a development pathway that increases vulnerability or one that will be very costly to maintain or reverse. We also noted that from an adaptation perspective, the land use planning system is one of the most important functions delivered by local government.

For our second report,² we reviewed the contribution of the land use planning system to the UK's adaptation effort by assessing development patterns in a sample of local authorities over the last ten years. We found that there has been continued development in the floodplain and in areas of eroding coastline consistent with the national picture, where since the late 1980s around 10% of all new dwellings have been constructed in high flood risk areas. We also found that the area of hard surfacing in the urban authorities we sampled had increased and this corresponded with a fall in the amount of greenspace. These trends

¹ Adaptation Sub-Committee (2010) *How well prepared is the UK for climate change?*
<http://www.theccc.org.uk/reports/adaptation/1st-progress-report-2010>

² Adaptation Sub-Committee (2011): *Adaptation in the UK - Measuring progress*
<http://www.theccc.org.uk/reports/adaptation/2nd-progress-report-2011>

have the potential to be increasing the UK's vulnerability to the impacts of climate change, particularly from flooding.

Another key finding from our analysis was that practically all (96%) of the major development applications in flood risk areas we sampled had at least one flood resilience measure, such as raised floor levels, as well as measures to manage surface run-off, such as SuDS. Local authorities appear to be relying on these types of property-level measures, alongside wider investment in community-scale flood management schemes, to offset the increase in vulnerability caused by development in the floodplain.

From our small sample we did not find evidence of local authority planners transparently assessing if property-level measures and flood defences would in fact be sufficient to offset this potential increase in vulnerability. As climate change and sea level rise are likely to increase the frequency and magnitude of flood events over the course of this century, we can expect future damage and disruption when defences are breached. Furthermore, increasing reliance on defences will lock-in long-term maintenance costs for the lifetime of the development they are protecting. We found that, in taking strategic decisions on the location of new development, planners are generally not weighing up these long-term costs against the benefits from development in flood risk areas that are more immediately realised, such as avoiding blight or regenerating derelict land.

In conclusion, our analysis to date suggests that planning policy in relation to adaptation has successfully enabled the use of property-level flood resilience measures, but has had less influence on strategic locational decisions. It is not clear to us how far planning policy has enabled local authorities to account explicitly for the long-term costs and damages from climate change in drawing up local development plans.

Implications of ASC's findings for draft National Planning Policy Framework

A number of provisions and policies in the draft framework are sensible from an adaptation perspective and will give local decision-makers clear guidance on how they should account for climate change risks. These include:

- Adaptation being a strategic priority for local development plans.
- The requirement on local planning authorities to demonstrate successful cooperation, particularly on issues that cross administrative boundaries and relate to strategic priorities (i.e. including adaptation).
- The policy that new development should be planned to avoid increasing vulnerability to impacts arising from climate change and when development is brought forward in vulnerable areas that care should be taken to ensure that risks

can be managed through suitable adaptation measures, including green infrastructure.


- The retention of a sequential, risk-based approach that aims to steer development to areas with the lowest probability of flooding and that takes account of the impacts of climate change.

However, as our analysis to date shows, while the planning system sets out sensible principles on adaptation (and has done so for several years), it is not clear that these principles are being applied robustly or consistently.

Therefore we advise that in finalising the National Planning Policy Framework, the Government should consider how the planning system can enable local decision-makers to explicitly weigh up the long-term costs of climate change impacts against the social and economic benefits from development that are more immediately realised. We suggest that the test for examining the 'soundness' of local plans should include the need to explicitly account for the implications of climate change, alongside the range of other priorities and issues facing communities.

I am copying this response to your colleague Andrew Stunell MP. I met with Andrew at the end of last year to discuss adaptation in relation to CLG policies. We are meeting again this month to discuss a forthcoming Ministerial Green Breakfast session on adaptation to climate change, which is being chaired by the Secretary of State for Defra and at which we are both presenting.

I trust that this advice will be of use to you and your colleagues when finalising the policy framework. May I take the opportunity to place on record my gratitude to your officials for their assistance over the last year or so.



Lord Krebs Kt FRS
Chair
Adaptation Sub-Committee
Committee on Climate Change

Cc
Andrew Stunell MP
Richard McCarthy

- 1.3.5 the lack of credibility or independence of the aviation evidence presented to support the need case for the proposed development;
 - 1.3.6 the lack of evidence as acknowledged by the Examining Authority to enable it to assess viability of the proposed development or determine whether funding could be secured for the proposed development;
 - 1.3.7 the lack of transparency over the identity of RSP's beneficial owners or evidence regarding the track record of RSP or its directors; and
 - 1.3.8 the nature, scale and applicability of the purported "associated development" in so far as they pertain to the relevant Associated Development Principles and Guidance.
- 1.4 It is clear, in SHP's view that the Applicants appear to be simply using the DCO process as a ruse to obtain this valuable site. As such, it is an abuse of the Planning Act 2008 which requires careful and thorough scrutiny of all areas.
- 1.5 This Relevant Representation outlines the principal concerns and objections of SHP in relation to the Application, and the areas where SHP considers that further and more detailed examination is particularly warranted. SHP intends to submit detailed Written Representations in support of the points raised in this Relevant Representation once the examination has begun and the examination timetable has been set.
- 1.6 SHP urges the Examining Authority in the strongest possible terms to make arrangements for a swift, testing and detailed examination of the Application. SHP's own proposals for the land affected by the Application, a major housing and mixed use scheme, are being delayed as a result of this Application.
- 1.7 As such, it will require a panel of Examining Inspectors with sufficient expertise and experience of examinations and in particular the law and high burden of proof for compulsory acquisition where there is a high degree of disagreement as to the justification for a DCO (let alone the basis for this being a DCO application at all – see further below). Such an examination will require very specific forensic interrogation and questioning of the evidence, including appropriate cross-examination, particularly where there is a clear difference between stated experts.

2. BACKGROUND & CONTEXT

- 2.1 The history of Manston Airport over the past 20 years is one of consistent financial failure.¹ In its period of private ownership from 1999 up to its closure in 2014, the airport failed to sustain viable aviation operations and had incurred aggregate financial losses in excess of £100 million. Each of the owners had found, in turn, that the factors that made Manston a valuable asset in time of war were insurmountable obstacles in a competitive commercial aviation market for either passenger or cargo operations. SHP purchased the SHP Land, as an already closed airport, in October 2014.
- 2.2 High level statistics and trends regarding the UK market for dedicated air freighters show what contributed to Manston's previous failure and demonstrate why there is no need or case for a reopened airport at Manston. In summary, these are:
- 2.2.1 Cargo air traffic movements ("**ATMs**") recorded by the CAA in the UK fell from c.110,000 in 2000 to c.52,000 in 2017². This was driven by long term market trends as air freight migrates onto cheaper, more flexible and

¹ Kent County Council, Position Statement (March 2015) 'Manston Airport under private ownership: The story to date and the future prospects'

² Data taken from the CAA website - [REDACTED]

Appendix D: Construction state of consented DCOs

JJH04

The following is based on public domain information reviewed by the UCL research team. All information is correct to the best of publically available information as of 1 November 2016.

SUMMARY

7 schemes built (14%)	Mainly Highways and Railways
13 under construction (26%)	Mainly Highways and Windfarms
11 with planned construction dates (22%)	Mainly energy projects
19 not started construction and no public date to do so (38%)	Mainly energy projects
	2 definitely cancelled

Project	Promoter	Decision	Order	Correction	Change	Construction status
Rookery South EfW	Covanta Energy	13-Oct-11	2013/680			Construction to commence late 2017 - Covanta and Veolia
Ipswich chord	Network Rail	05-Sep-12	2012/2284			Built. Opened March 2014
North Doncaster chord	Network Rail	16-Oct-12	2012/2635			Built. Opened June 2014
Kentish Flats windfarm	Vattenfall	19-Feb-13	2013/343			Built. Operational from December 2015
Brechfa Forest windfarm	RWE Npower	12-Mar-13	2013/586		2016/337	Construction due to start before the end of 2016
Heysham to M6 link road	Lancashire County Council	19-Mar-13	2013/675		2015/571	Built. Opened October 2016
Hinkley Point nuclear	EDF Energy	19-Mar-13	2013/648	2013/2938	2015/1666	Financing still being put in place, construction commencement date TBC
Galloper windfarm	SSE Renewables	24-May-13	2013/1203	2013/2086	2015/1460	Construction commenced November 2015
Triton Knoll windfarm	RWE Npower	11-Jul-13	2013/1734			Pre-construction surveys conducted early November 2016
King's Cliffe haz waste	Augean	11-Jul-13	2013/1752			Unclear but believe now built
Blyth biomass	RES	24-Jul-13	2013/1873			Cancelled due to uncertain government funding
M1 J10a upgrade	Luton Council	30-Oct-13	2013/2808			Built. Opened July 2015
Redditch improvement	Network Rail	31-Oct-13	2013/2809			Built. Opened September 2014
Able Marine Energy Park	Able UK Ltd	18-Dec-13	2014/2935			Construction due to commence 2017 but uncertainty over funding
King's Lynn line	National Grid	18-Dec-13	2013/3200			Construction not yet started, awaiting decision to develop King's Lynn B Power Station

Funding infrastructure

JJH05

 Tweet this

What do we mean by 'funding' infrastructure?

Funding is how you pay for infrastructure. That means over its lifetime, not just the upfront cash.

For example, [Hinkley Point C](#) will be paid for by energy consumers through charges on their bills, although foreign investors are paying for it to be built. [High Speed 2](#) will ultimately be paid for out of taxes, even if government must borrow to cover the cost of construction.

 Tweet this

Is there a difference between 'funding' and 'financing'?

[Financing](#) is how you meet the upfront costs of building the infrastructure, funding is how you pay for it over its lifecycle.

These terms are regularly used interchangeably, [not only by journalists and analysts but by politicians too](#). But they are distinct.

Understanding the distinction is key to understanding where the problem lies in paying for infrastructure. The ability to finance a project is closely linked to funding.

 Tweet this

Why does funding require more attention?

Without a clear funding stream, it can be difficult to access the upfront cash needed to construct new infrastructure. Governments are unlikely to finance a project if they do not believe that long-term maintenance and operation costs can be met.

The funding available to a project becomes ever more critical if private finance is sought to meet the upfront costs of building the infrastructure.

Evidence suggests there is [no shortage of private finance](#) seeking to invest in UK infrastructure. The bigger problem is a lack of clarity on funding which makes it difficult for investors to know how they will be paid back.

By having clear arrangements for funding, it is possible to unlock more investment which contributes to new infrastructure being built - and faster.

 Tweet this

Where does the money to fund infrastructure projects come from?

RiverOak Strategic Partners completes Jentex acquisition

Published on September 18th, 2018

Today (18 September 2018) RiverOak Strategic Partners (RSP) completed the acquisition of the Jentex site on Canterbury Road West in Ramsgate, which is designated in our proposals as the location of the airport fuel facility.

The Jenkins family, which has operated the site for many years as a fuel oil business, will continue to do so until the conclusion of the DCO – after which they will become the operators of the new fuel facility

As a condition of the sale of the land to RSP, the Jenkins family required us to help them ensure the planning permission for an extra-care sheltered housing scheme on the land remained current, which RSP is happy to do and has worked with them to submit a new planning application to replace the previous consent. This condition will fall away when the DCO is granted.

George Yerrall, Director of RSP, said: "The Jenkins family is a pleasure to deal with and I am delighted we are building a long term relationship with them. We have always been clear that we want local businesses to share in the success of reopening Manston and I hope this is the first of many such relationships we will forge with businesses across Thanet and East Kent."

Added Tony Jenkins: "We have always been huge supporters of Manston and look forward to seeing it reopen. I take real pride in the knowledge that our family will be able to apply our 55 years of experience, in running Jentex, to the challenges of building and operating the new airport fuel facility – and I look forward to the next steps in the DCO."



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RiverOak Strategic Partners

Title Number : K315361

This title is dealt with by HM Land Registry, Nottingham Office.

JJH07

The following extract contains information taken from the register of the above title number. A full copy of the register accompanies this document and you should read that in order to be sure that these brief details are complete.

Neither this extract nor the full copy is an 'Official Copy' of the register. An official copy of the register is admissible in evidence in a court to the same extent as the original. A person is entitled to be indemnified by the registrar if he or she suffers loss by reason of a mistake in an official copy.

This extract shows information current on 16 OCT 2018 at 18:20:12 and so does not take account of any application made after that time even if pending in HM Land Registry when this extract was issued.

REGISTER EXTRACT

Title Number : K315361

Address of Property

:

Price Stated

:

Not Available

Registered Owner(s)

:

Lender(s)

:

None



JJH08

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Ellington Park project celebrates winning Heritage Lottery Funding

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Work can now get under way on the Clague designed café, community hub and gardening workshop, along with the refurbishment of its Victorian bandstand and extensive re-landscaping of the gardens.

The work by Clague Architects, led by Gareth Leggeat, Associate, was instrumental in securing planning consent for the regeneration of Ellington Park, which dates from 1892.

Gareth Leggeat said: “At long last this historic public park will be returned to its former splendour, whilst improving the facilities to ensure it will have a sustainable future as a hugely important public amenity for the people of Ramsgate.”

The project features a single storey flat roofed café, with knapped flint finish to match the Victorian boundary walls around the park.

Its glazed frontage, with concertina doors and a central opening has views out on to the park. Designed with windows and doors on three sides of the building with security shutters for night time protection, the building will have modern lavatories including baby changing facilities.

The café can be converted into a space for community events, and has a workshop and education area.

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new buildings will once again provide these much needed facilities.

JJH08

The scheme is expected to commence by summer 2019.

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**Ministry of Housing,
Communities &
Local Government**

Councillor Robert W. Bayford
Leader, Thanet District Council

The Rt Hon Sajid Javid MP

*Secretary of State for Housing, Communities and
Local Government*

**Ministry of Housing, Communities and Local
Government**

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London SW1P 4DF

Tel: 0303 444 3450

Email: sajid.javid@communities.gsi.gov.uk

www.gov.uk/mhclg

23rd March 2018

Dear Councillor Bayford

LOCAL PLAN INTERVENTION

Congratulations on becoming Leader of Thanet District Council earlier this month, I was pleased to see your statement that you will prioritise work on the Local Plan. However, I am writing today as a result of the Council's persistent failure over many years and under different administrations, to get a Local Plan in place, following on from the concerns I set out on 16 November 2017 about the lack of progress that had been made in plan-making. The housing White Paper set out that intervention in Local Plans will be prioritised where:

- the least progress in plan-making has been made
- policies in plans had not been kept up to date
- there was higher housing pressure; and
- intervention would have the greatest impact in accelerating Local Plan production

We also made clear that decisions on intervention will be informed by the wider planning context in each area (specifically, the extent to which authorities are working cooperatively to put strategic plans in place, and the potential impact that not having a plan has on neighbourhood planning activity). I gave the District Council the opportunity to put forward any exceptional circumstances by 31 January 2018, which, in the Council's view, justifies the failure to produce a Local Plan under the Planning and Compulsory Purchase Act 2004 regime.

I have considered carefully the Council's letter of 31 January 2018. In summary, in January 2018, the District Council resolved to reject the recommendation of officers to publish the draft Local Plan and is therefore failing to meet its deadline for publication of a Plan, in accordance with your published Local Development Scheme. The Council

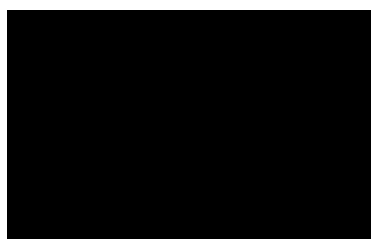
has failed to meet milestones in published Local Development Schemes at least five times since 2004.

The District Council's argument to justify this failure sets out two inter-related circumstances – the local debate over the future of Manston Airport and the need to undertake further work to identify alternative sites after the Plan failed to proceed. I consider that these are not exceptional circumstances – other authorities have dealt with uncertainty about the future of large sites.

In terms of the intervention criteria, Thanet have failed to make progress on plan-making, the policies do not appear to be up to date and there is high housing pressure. At the current time this is an authority where intervention would have the greatest impact by accelerating Local Plan production. The Council does not have an up to date Local Development Scheme, whilst I note the suggestion from your officers that your Council intends to update the scheme.

Having considered the Council's representations and the Government's policy set out in the November 2017 Written Ministerial Statement and the housing White Paper, I have decided to continue with the intervention process. As discussed at our meeting on 6 February 2018 this will involve a team of experts, led by the Chief Planner, providing me with further advice on next steps. My officials will be in contact with your officers to discuss the next steps.

My officials will also begin formal discussions on the options of inviting Kent County Council to prepare a Local Plan for Thanet and with the neighbouring authorities on the possibility of directing a Joint Plan, as part of considering whether to use my statutory powers and if so which ones.



RT HON SAJID JAVID MP

Written summary of oral submission presented to Manston Airport DCO Examining Authority

Submitted by Jason Jones-Hall, Local resident and business owner

Date of Hearing: Open Floor Hearing, 11th January 2019

Please note that evidence to support this submission has been presented in Appendix, attached, with corresponding reference numbers, as noted and referenced in the footnotes of this submission, printed in the top right corner of each item and highlighted text where appropriate.

I would like to bring to the attention of the Examining Authority a number of issues which I believe are so fundamental that they must surely be properly addressed and fully answered before it is even possible to move on to the finer detail of the application, as follows:

1) Bernard Wheatcroft Ltd. v Secretary of State for the Environment and Another

The submitted application is significantly different, by several thousand pages, to that which was consulted on. During the preliminary hearings, the applicant maintained that Wheatcroft applies only where *“there are changes that have arisen since the application was made”*¹

My understanding of the main criterion of Wheatcroft, as stated *per curiam*, is *“whether the development is so changed thereby that to grant it would be to deprive those who should have been consulted on the changed development of the opportunity of such consultation”*². This surely must apply here, irrespective of whether or not the changes have arisen before the application was made. The fact remains that we have been deprived of the opportunity to be consulted on the changed development proposal. This is of great concern to the community, and should be of equal concern to the statutory bodies and interested parties.

I would like to respectfully ask the Examining Authority (ExA) to consider the following:

- i) Is the ExA in a position to definitively state whether the application has passed the Wheatcroft test?
- ii) If not then I would like to strongly reiterate my initial request from the preliminary hearings that this question must surely be added to the list of Principle Issues and, further;
- iii) in order to properly assess whether Wheatcroft applies, we must first be able to properly assess both the extent of changes in the application and those parts of the application the public, statutory bodies and/or interested parties has or has not had

¹ [Recording of Preliminary Meeting \(PM\) - Afternoon Session - 9 January 2019. \(timecode: 01:43:06\)](#)

² Appendix, JJHOFH01: Wheatcroft -v- Secretary of State for the Environment and Another, 24 October 1980

the opportunity of consultation. As such, I respectfully request that the applicant should be *required* by the Examining Authority to produce a track-changed document, as discussed during the preliminary hearings.

2) Is there a strong enough case for overturning previously held decisions and guidance with regards to development of Manston Airport?

This is not solely an issue of commercial viability, which is debatable, but a question of geography, which is not.

This being the case, I would ask you to please consider whether there is a case for the Examining Authority to overturn previous and recent Government decisions and guidance with regards to Manston Airport, which over a period of 25 years and as recently as June 2018, has consistently determined that development of the site as an airport is not even worthy of consideration due to the geography of the site, proximity to the nearby town of Ramsgate and distance from the major sources of demand.

Needless to say that the geography has not changed over these 25 years. Previous considerations, decisions and guidance includes but is not limited to:

- i) RUCATSE report for the Department for Transport (DfT) into Runway Capacity to serve the South East, (1993) ³
- ii) The Future Development of Air Transport in the UK - South East (DfT, 2002) ⁴
- iii) Sir Howard Davies' Airports Commission Interim Report of 2013 ⁵
- iv) Sir Howard Davies' Airports Commission Final Report of 2015 ⁶
- iv) House of Commons Briefing Paper of June 2018 ⁷, which concluded with regards to the Manston Airport site *"The Government's view is one of tacit support for the return of airport operations, but has insisted it is a matter for the local community, the owners and the Local Authority"* Respectfully, this does not suggest a "Nationally Significant" Infrastructure Project requiring Government intervention through the UK Planning Inspectorate. Rather, it supports previous statements from the Secretary of State for Transport that *"The Government are unable to directly intervene in the case of Manston"* ⁸.

³ Appendix, JJHOFH02: House of Commons Hansard, Written Answers for 21 May 1993 (pt 13)

⁴ Appendix, JJHOFH03: The Future Development of Air Transport in the United Kingdom, South East, July 2002. (p.93, Para 12.12)

⁵ Appendix, JJHOFH04: House of Commons Hansard, 28 April 2014, Vol. 579, Column 676

⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/440316/airports-commission-final-report.pdf

⁷ Appendix, JJHOFH05: House of Commons Briefing Paper CBP2893, Airports in the South East of England, 5 June 2018, (p. 23)

⁸ Appendix, JJHOFH04: House of Commons Hansard, 28 April 2014, Vol. 579, Column 676

3) Geographic Proximity to and Effect on Ramsgate

As the vast majority of Relevant Representations show, as local residents we are chiefly concerned with what the 2002 DfT report referred to as a key constraint with regards to *“noise impacts over the nearby town of Ramsgate”*⁹

The closest residential properties lie just 0.12 Nautical Miles (NM) to the South East of the runway, the main residential area of the town starts at Nethercourt, 0.77 NM directly underneath the flightpath and Ramsgate’s main beach and historic Royal Harbour is but 2.27 NM from the runway and directly under the flightpath¹⁰.

It is worth pointing out also that Ramsgate is one of only 10 designated Heritage Action Zones in the UK, with more than 450 residential listed buildings and 3 designated conservation areas¹¹.

It is my contention that the applicant is well aware that the proximity to this historic and beautiful town is a significant issue, which is why they have somewhat cynically and - in my view - rather contemptuously restricted their Preliminary Environmental Impact Report (PEIR) to a study area of a mere 1km.¹² Frankly, this is - at best - a desperate attempt to avoid uncomfortable truths and, at worst, a blatant attempt to mislead, which surely must be called into question by the Examining Authority.

The reality is that that commercial aircraft - as a rule of thumb - ascend or descend at a rate of approximately 300ft per Nautical Mile¹³. This means cargo planes flying overhead at an altitude of less than 100ft for the properties closest to the airport, 231ft for residents in Nethercourt and a maximum of 680ft over the centre of town and the only Royal Harbour in the UK.

In an effort to assist the Examining Authority in visualising the reality of these low flying aircraft so very close to the historic town and residential areas of Ramsgate, I would like to respectfully present images taken from a video of aircraft passing over main residential areas and over the Royal Harbour and Town Centre during previous operations of the airport at altitudes of between approximately 399ft - 660ft.¹⁴

⁹ Appendix, JJHOFH03: The Future Development of Air Transport in the United Kingdom, South East, July 2002. (p.93, Para 12.12)

¹⁰ Appendix, **JJHOFH06**: Google Earth images showing distances from end of runway

¹¹ Appendix JJHOFH07: Historic England Ramsgate Case Study, also available at <https://historicengland.org.uk/content/heritage-counts/pub/2017/case-study-ramsgate-conservation-area-pdf/>

¹² Appendix JJHOFH08: Applicant’s PEIR Appendix 9.1, (pages 258-261)

¹³ Appendix JJHOFH09: Aircraft Climb Performance, Dr Darren Rhodes, CAA, (Pg. 5)

¹⁴ Appendix JJHOFH10: Images of aircraft passing over Ramsgate Royal Harbour and Southwood Gardens

3) Opportunity Cost

For the purposes of this hearing I will keep this brief, save to say I fully support the Statement on the Likely Outcome for Ramsgate made at these Open Floor Hearings by the Ramsgate Town Clerk.¹⁵

My only request at this stage is that the Examining Authority might fully consider not just the economic opportunity that the proposed development may or may not present, but also the significant cost of lost opportunities that the region has already suffered through this process and the even greater opportunity cost to the region should we continue to indulge the applicant in an endeavour that written evidence will show to be lacking in any credibility or viability. I fully intend to provide evidence in support of this issue through my Written Representation, to be submitted at Deadline 3 of the Examination.

4) Due Diligence on Applicant Company and Directors

Recent news events with regards to Seabourne Freight have been very damaging to Ramsgate and we can ill-afford any more national newspaper headlines regarding failures of due diligence in transport infrastructure projects.

This being the case, I would respectfully request that the Examining Authority place the highest scrutiny on the applicant company, its directors and the lack of transparency with regard to ultimate beneficial owners.

I will be covering this in more detail, with accompanying evidence, in my Written Representation at Deadline 3. In the meantime, key questions arise over the following:

i) It appears from filings at Companies House that for much of the consultation and application period and until at least 31 July 2017, the Applicant was a dormant company¹⁶. How is it possible that a dormant company has been so active during this dormant period, having spent a reported, (although not evidenced), £9m on this process?

ii) Despite only having been in existence for a little over 2 years and never having traded, the corporate structure¹⁷ of the applicant has so far involved no fewer than 7 different registered companies, with an eighth, RiverOak MSE Ltd, registered as recently as 10th December 2018¹⁸. Why is such a convoluted corporate structure

¹⁵ Appendix, JJHOFH11: A Statement on the Likely Outcome For Ramsgate in the Event of a Revival of Manston Airport

¹⁶ Appendix, JJHOFH12: RiverOak Strategic Partners Limited Accounts Filed for a Dormant Company

¹⁷ Appendix, JJHOFH13: Applicant Corporate and Financial Structure chart, prepared from information publicly available at Companies House

¹⁸ Appendix, JJHOFH14: RiverOak MSE Limited Registration Certificate

necessary at this early stage, who exactly is the applicant and who are the Persons with Significant Control and Ultimate Beneficial Owners within this structure?

iii) Filings at Companies House appear to show a complicated financial structure¹⁹ between these different entities, with RiverOak Operations Ltd (ROL) latest balance sheet showing it has been loaded with debt to the tune of £3.8m and the only visible funds - a total of £588,906 - held on trust for ROL by a third party, Freudmann Tipple Ltd, 90% owned by Anthony and Evelyn Freudmann.

From a lay person's perspective, this might appear at first glance to be a circular loan structure designed for aggressive tax avoidance. The Applicant might be invited to provide its own explanation as to why this complicated arrangement is strictly necessary.

iv) The Applicant's Funding Statement, previously submitted and published by PINs on 14 August 2018, is woefully inadequate. I note that the Planning Inspectorate has already noted in its Section 51 Advice²⁰ that *"the Inspectorate considers that the Funding Statement poses a substantial risk to the examination of the application"*.

I am unaware of any updates to this Funding Statement and would ask that these should be provided and published at the earliest opportunity.

5) Development of Land and Air

This is the first ever DCO for an Airport. Unlike any other DCO currently going through the Examination process, an Airport has the unique characteristic of requiring not only land to be developed, but also airspace. Needless to say, without this crucial element finalised and secured by the applicant, the proposed project is doomed to an even more spectacular failure than previous experience has shown.

It is inexplicable, therefore, that the Applicant has thus far failed to even begin the Airspace Change Process with the CAA - a process which the Applicant has itself acknowledged will take the best part of two years. At best, this shows the absolute inexperience, naivety and unsuitability of the Applicant. I would invite the Examining Authority to rigorously question the Applicant as to why this process has not yet even begun when other more suitably qualified and experienced Airport operators - notably Heathrow, Gatwick and Luton - have done so well in advance of their own developments?

Finally, how is it even possible for the Examining Authority to approve an Air Cargo Hub development within a strict 6 month deadline, knowing that it will be another 18

¹⁹ Appendix, JJHOFH13: Applicant Corporate and Financial Structure chart, prepared from information publicly available at Companies House

²⁰ Appendix, JJHOFH15: Post-Acceptance s51 Advice to the Applicant

months before the CAA has fully assessed the ACP and reached its own determinations?

In light of this, and the issues discussed and raised by others with regards to the opportunity cost of this proposal, I would like to strongly reiterate my request that some consideration is given to the question of what happens to the land in the event that a DCO is granted to the applicant and the airport development does not - or cannot - proceed.

Status:  Judicial Consideration or Case History Available

***233 Bernard Wheatcroft Ltd. v Secretary of State for the Environment and Another**

Queen's Bench Division

24 October 1980

(1982) 43 P. & C.R. 233

Forbes J.

October 21 and 24, 1980

Town and country planning—Planning permission—Whether power in local planning authority or Secretary of State to grant planning permission for smaller development than that for which permission applied for—Whether proper test whether development proposed in application for planning permission severable or whether to allow development subject to condition that size of development should be reduced would be to allow development in substance not that for which planning permission applied for—Planning judgment—Matters to be taken into account—Whether those who should have been consulted on changed development deprived of opportunity of consultation

The applicants applied to the local planning authority for planning permission for a housing development comprising approximately 420 dwellings on 35 acres. The local planning authority refused permission, and the applicants appealed to the Secretary of State. Prior to the opening of the inquiry, the applicants indicated to the local planning authority that they were proposing to put forward at the inquiry an alternative proposal for 250 dwellings on 25 acres, that alternative proposal to be considered only if the issue of scale of development was deemed to be critical to the determination of the appeal. That alternative proposal was duly put forward at the inquiry. The local planning authority contended that the Secretary of State could not legitimately reduce the area of the appeal site by 10 acres and only had power to deal with the application as submitted. The inspector in his report concluded that if the appeal was restricted to consideration of 420 dwellings on 35 acres it should, on the planning merits, be dismissed but that if it was permissible to reduce the area to 25 acres and for the number of dwellings to be reduced such development would not be objectionable and planning permission should be granted accordingly. The Secretary of State in his decision letter said:

Having regard to the inspector's conclusions concerning a smaller site than that proposed in the application under appeal, whilst it is accepted that there are circumstances where a split decision would be appropriate, the opinion is held that where an appeal results from an application for permission to erect a specified number of dwellings without any indication at all of their sizes or of the individual plots, the proposed development is not severable and it would be improper to purport to grant permission in respect of part of the site or for a lesser number of houses.

He accordingly dismissed the appeal. The applicants applied under section 245 of the Town and Country Planning Act 1971 for his decision to be quashed.

Held, allowing the application, that there was no principle of law that prevented the imposition on a planning permission of conditions that would have the effect of reducing the permitted development below that for which permission had been applied for except where the application was severable; that the true test was not whether the development proposed in the application was severable but whether the effect of the conditional planning permission would be to allow development that was in substance not that for which *234 permission had been applied for; and that, accordingly, the Secretary of State having misdirected himself in law, his decision must be quashed.

Kent County Council v. Secretary of State for the Environment (1976) 33 P. & C.R. 70 considered

Per curiam The main, but not the only, criterion on which the judgment of the local planning authority or the Secretary of State should be exercised on the question whether the effect of such a conditional planning permission would be to allow development that is in substance not that for which permission has been applied for is whether the development is so changed thereby that to grant it would be to deprive those who should have been consulted on the changed development of the opportunity of such consultation, those words being used to cover all the matters of the kind with which Part III of the Act of 1971 deals. Where a proposed development has been the subject of such consultation and has produced a root-and-branch opposition to any development at all, it is difficult to believe that it should be necessary to go again through the process of consultation about a smaller development.

MOTION.

The facts are stated by [REDACTED]

Representation

- [REDACTED] for the applicants, Bernard Wheatcroft Ltd.
- The first respondent, the Secretary of State, was not represented.
- [REDACTED] the second respondents, the Harborough District Council.

Cur. adv. vult.

[REDACTED]
October 24. In this case [REDACTED] moves to quash an order of the Secretary of State for the Environment whereby he dismissed an appeal against refusal of planning permission by the second respondents, the Harborough District Council. Despite the fact that it is concerned solely with the extent of his powers, the Secretary of State is not represented.

The facts may be set out briefly as follows. The applicants own a large area of agricultural land at Bitterswell Road, Lutterworth, in the district of Harborough. The site with which we are concerned is a 35-acre portion of that land lying to the north of Lutterworth and immediately adjacent to a developed area of that town, a large portion of which in fact is a previously developed estate of the applicants. The applicants also own a still further area of seven acres of land that was not included in the application. In 1972, despite objection by the local planning authority, the Secretary of State decided that 25 acres of the 35 for which planning permission was now applied for were suitable for development if two problems could be overcome. The first was surface water disposal, and the second was access to Bitterswell Road. The Secretary of State said, as I understand it, that the access problem alone would not have been sufficient to prevent planning permission being granted. After that appeal, and encouraged by the Secretary of State's decision, the applicants purchased some further land that enabled, in their view, the access problem to be overcome, and that land was included in the current application. The 35 acres included, however, further land, beyond *235 the original 25 and not included in the access land, that extended into open meadow with no particular natural boundaries. The application was made on the appropriate form on April 3, 1978. After giving the address of the site and identifying the 35 acres on a plan, the applicants went on to answer an invitation on the form to state the number of dwelling units proposed by filling in "approximately 420 dwellings." It is pointed out that that is the mathematical result of taking a density of 12 houses to the acre over the whole of the 35 acre site. That application was refused by the local planning authority on July 12, 1978, for a variety of reasons, including amenity, population, access, traffic and surface water disposal. The applicants appealed to the Secretary of State on December 22, 1978, and a public inquiry was held on January 22 to 24, 1980. On January 4, that is, less than three weeks before the inquiry was due to be held, the applicants wrote to the local planning authority indicating that they were proposing to put forward another proposal and submitted what they described as a schematic layout showing about 250 dwellings on a reduced area of 25 acres. The letter emphasised that the applicants "would wish the schematic lay-out to be considered as a viable alternative proposal to the application as originally submitted only if the issue of scale of development is deemed to be critical to the determination of the appeal and without prejudice to the proposals contained in the original application."

On January 11, 1980, the local planning authority wrote back: "My council is of the opinion that

this is a new application and should be considered in the normal way, that is, determined by the council after consultation with interested parties," etc. At the inquiry, the applicants called a planning consultant who said that he could not support the development of 420 units on the 35-acre site, and he produced three alternative plans. Two of them provided for 250 dwellings on 25 acres and differed only in their proposals for access and internal roads. The third included another six acres, making 31 in all, and provided for 330 to 350 dwellings. The local planning authority's case was almost wholly concerned to argue that any development on this site would have undesirable consequences, although it is clear that the impact of the development reduced to 250 houses had been examined by the traffic experts of the county council, who appear to have given evidence that even this reduced number was unacceptable on traffic grounds. The local planning authority maintained at the inquiry that the Secretary of State could not legally reduce the area of the appeal site by 10 acres and that he only had power to deal with the application as submitted. It was accepted that the surface water objection could be adequately resolved by using a balancing reservoir scheme, and that reason for refusal was abandoned.

Various other parties appeared at the inquiry. A fair reading of their evidence and arguments recorded in the inspector's report is that they objected to any development on the site. One of them *236 clearly stated that even 250 houses would be objectionable. The inspector reported on March 6, 1980. It is unnecessary to refer to his report other than to summarise his conclusions and recommendations. His conclusions were, first, that it was a legal matter for the Secretary of State to determine whether it was possible to restrict any planning permission granted on that appeal to an area smaller than 35 acres and to fewer than 420 dwellings, secondly, that if the appeal was restricted to consideration of 420 dwellings on 35 acres he felt that it should be dismissed, thirdly, that, if it was permissible to restrict the area to 25 acres and for the number of dwellings to be reduced, then such development would not be objectionable. He recommended that, on the assumption that there was no legal bar to such action, permission should be granted for the erection of dwellings on 25 acres at a density of 10 to the acre.

The Secretary of State gave his decision by a letter dated April 24, 1980. After setting out the inspector's conclusions and recommendations, he went on in paragraphs 4 and 5:

4. Having regard to the inspector's conclusions concerning a smaller site than that proposed in the application under appeal, whilst it is accepted that there are circumstances where a split decision would be appropriate, the opinion is held that where an appeal results from an application for permission to erect a specified number of dwellings without any indication at all of their sizes or of the individual plots, the proposed development is not severable and it would be improper to purport to grant permission in respect of part of the site or for a lesser number of houses. In this particular case it must be noted that although plans D, E and F illustrate a possible lay-out and a reduced approximately 25-acre area of the appeal site for about 250 dwellings which your clients agree would be an acceptable alternative development, it was clearly indicated at the inquiry that these plans, which were submitted after the appeal had been made, were not provided as replacements for the original appeal proposals. Consequently the view is held that it would not be appropriate for the appeal proposal to be severed or reduced, and the Secretary of State has therefore considered the appeal on the basis of the original application before him. 5. The Secretary of State agrees with the inspector's conclusions regarding the proposal on this appeal and concurs with his opinion that the appeal should be dismissed. Any proposal for a smaller development would have to be the subject of a further application which would lead to consideration by the local planning authority in the first instance. In the circumstances the Secretary of State does not propose to comment on any of the inspector's conclusions regarding a reduced development. For the reasons given he does not accept the inspector's recommendations and thereby dismisses the appeal.

The real question in this case is whether the Secretary of State was right in considering that he had no power to grant planning permission for development on a smaller site and with houses at a lower *237 density than were indicated on the application form originally submitted to the local planning authority.

Mr. Sullivan, however, had an argument that, on a true reading of the decision, the Secretary of State was in fact exercising his planning discretion. It will be convenient to deal with this

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Thames Leisure Craft Operators

██████████ To ask the Secretary of State for Transport what training and qualifications are required of masters of passenger pleasure and leisure craft on the River Thames. [29541]

██████████ I have asked the chief executive of the Marine Safety Agency to write to the hon. Member.

Letter from ██████████, dated 21 May 1996:

The Secretary of State has asked me to reply to your Question about the training and qualifications required for masters of passenger, pleasure and leisure craft on the River Thames.

Masters of vessels on the River Thames which carry more than 12 passengers must be qualified in accordance with the Merchant Shipping (Local Passenger Vessels) (Masters' Licences and Hours, Manning and Training) Regulations 1993. The 1993 regulations require masters to hold a current Boatmaster's Licence which is appropriate to the waters in which their vessel is being navigated and the number of passengers being carried. The training requirements which must be satisfied before the licence is issued are described in Merchant Shipping Notice M. 1525. I enclose copies of the 1993 regulations and M.1525 with this letter. Exemptions from the requirement to hold a Boatmaster's Licence can be granted where the master holds a qualification the standards for which are considered at least equivalent to the Department's standards for the relevant grade of Boatmaster's Licence. The Port of London Authority's (PLA) Waterman's Licence is recognised as equivalent to the MSA's Boatmaster's Licence for masters of vessels on the River Thames which carry more than 12 passengers. To obtain such a licence a master has to pass four independent professional examinations before achieving a full licence. Thereafter, they are required to maintain its validity by working on the river for 150 days every 3 years. Anyone failing to meet this experience criterion has to be re-examined.

Masters of vessels on the River Thames carrying 12 passengers or fewer are required by the PLA to hold the PLA Waterman's Licence.

Airport Development

██████████: To ask the Secretary of State for Transport, pursuant to his answer of 26 March, *Official Report*, column 542, what is the time scale of each of the detailed assessments listed. [29570]

21 May 1996 : Column: 134

██████████ Detailed assessments of Heathrow, Gatwick, Stansted and Luton were carried out by the RUCATSE working group as it judged only these airports offered worthwhile prospects of responding to forecast levels of demand. The group took the view that Southampton, Manston and Lydd did not merit detailed assessments. RUCATSE's report was published in July 1993.

King's Cross Railway Lands (Gasholders)

██████████ To ask the Secretary of State for Transport what steps he is taking to relocate the gasholders on the King's cross railway lands. [30356]

██████████ Union Railways and London and Continental Railways, who will be responsible for designing and constructing the channel tunnel rail link, are consulting English Heritage about the priority which should be afforded to the gasholders among other St. Pancras heritage projects.

Driving Licences

██████████ To ask the Secretary of State for Transport what opinion surveys were commissioned by his Department to test public support for plastic photocard driving licences; and what were the results. [29984]

██████████ A preliminary public consultation during 1991 showed strong support for including photographs on driving licences. Subsequent public consultation in 1994 confirmed the earlier support.

██████████ To ask the Secretary of State for Transport, pursuant to his Department's press notice of 10 April, Reference 110, how he measures the benefits in terms of establishing identity from the introduction of plastic photocard driving licences. [29982]

██████████ Introduction of plastic photocard licences will, among other benefits, reduce the possibility that lost or stolen licences may be used to support a false identity--for example, when taking a driving test or hiring a vehicle.

██████████ To ask the Secretary of State for Transport what assessment he has made of the impact on the levels of fraud of the introduction of plastic photocard driving licences. [29983]

██████████ We intend to introduce stringent checking procedures which will make it extremely difficult to obtain a photocard driving licence fraudulently. The card format will incorporate a number of security features designed to prevent counterfeiting.

██████████ To ask the Secretary of State for Transport what are his plans to increase the reliability of identification procedures for the issuing of driving licences; whether these plans involve the taking of fingerprints or any other biometric measures; if access to personal data held by the Government Departments is involved; and what additional data items, not related to driving licences, are being considered to be included in

21 May 1996 : Column: 135

space on the licence allocated to member states for their own purposes. [30048]

██████████ The checks on the identity of applicants for photocard driving licences are being considered in the light of the best practices of the Passport Agency. These do not include fingerprints or biometric measures.

21 May 1996 : Column: 136

Access to personal information will be regulated under the provision of the Data Protection Act.

EU legislation allows member states to include additional information on the driving licence and designates an area on the licence for that purpose. No decision has yet been made on what it will contain.

21 May 1996 : Column: 135

21 May 1996 : Column: 137

TRADE AND INDUSTRY

Colliery Areas Regeneration

██████████ To ask the President of the Board of Trade if he will list the total allocation of the RECHAR funds over the last three years (a) in the United Kingdom and (b) in Wales. [29465]

██████████ The United Kingdom allocation for 1990-93 was 179.0 mecu, in 1992 prices of which 31.2 mecu was for Wales. The UK allocation for 1994-97 is at present 163.24 mecu, in 1995 prices, of which 20.46 mecu was for Wales. These figures reflect the preponderantly earlier incidence of job losses in the Welsh coal industry.

Radiocommunications Agency

██████████ To ask the President of the Board of Trade if he will list the areas under consideration for contracting out in the Radiocommunications Agency indicating the number of staff involved and the proposed time-scale involved; and if he will make a statement. [29376]

██████████ The Radiocommunications Agency and its predecessors has an excellent record for contracting out services. Licensing which does not involve frequency assignment has been contracted out; in other areas they have encouraged self management by industry groups wherever possible where this improves customer service. It is agency policy to review continuously all licensing activities to identify any potential candidates for future action. The support services of the agency were all contracted out on relocation to new headquarters in London's docklands last October.

The Radiocommunications Agency is also currently completing its prior options review, which is examining, among other things, the scope for any further contracting out across the agency. Ministers announced the outcome of the review of the customer services branch on 31 October 1995. It is anticipated that the review of the remainder of the agency will be completed within the next few months.

██████████ To ask the President of the Board of Trade (1) if he will list the terms of reference for the proposed strategic partnership between the Radiocommunications Agency information technology service and the private sector; how many staff are involved; and what are the estimated costs; [29378]

The Future Development of Air Transport in the United Kingdom: South East

A National Consultation



Second tier airports

- 12.11 The second tier of airports considered were Biggin Hill, Cambridge, Farnborough, Lydd, Manston, Shoreham, and Southend¹⁸. These sites were considered to have the runway and land suitable to support commercial aviation. Some already accommodate scheduled, charter passenger or freight services along with business aviation – and Manston has substantial freight activity, being ranked seventh among all UK airports for freight tonnage in 2001. Possible development of Redhill and Northolt, as satellite runways of Gatwick and Heathrow respectively, was considered but rejected in favour of other development options at those airports.
- 12.12 At each site, the scale of possible development, the potential capacity and the main impacts and constraints were considered and an overall assessment made of the potential contribution of the airport at 2030. This assessment assumed that maximum use was made of existing runways at the major South East airports but that no new runway capacity was provided in the region.



Biggin Hill

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aviation-images.com

Cambridge

Marshall of Cambridge



Lydd



Farnborough

Tag Farnborough Airport

Biggin Hill – an upper limit of 500,000 passengers per annum was assumed. Constraints include poor surface access links and noise impacts on nearby residential properties.

Cambridge – no contribution was assumed as there are considerable noise constraints and the site might be redeveloped for housing.

¹⁸ Small Airports – Demand and Impact Appraisal, Halcrow, August 2001

Farnborough – no contribution was assumed because of significant planning constraints surrounding the type, number and size of aircraft which can operate. The airport operators do, however, have well developed plans for the continued development of the airport as a specialist business aviation facility. (see paragraphs 12.14 – 12.16 below on business aviation.)

Lydd – an upper limit of 125,000 passengers per annum was assumed. The limited immediate catchment population and poor surface access are the key constraints.



Manston

Manston Airport



Shoreham



Southend

Manston – an upper limit of 3 million passengers per annum was assumed. Manston has a long runway, and has a relatively supportive planning environment. Key constraints are its geographic position in relation to the major sources of demand and noise impacts over the nearby town of Ramsgate.

Shoreham – an upper limit of 500,000 passengers per annum was assumed. The runway length is the key constraint to development.

Southend – a capacity of 2 million passengers per annum was assumed. Constraints are the ability to lengthen the runway and noise impacts on residential areas of Southend.

- 12.13 In total, therefore, these airports might contribute capacity of about 6mppa by 2030. While our assessment of the contribution of each airport is not definitive, it is clear that, taken as a group, their overall contribution to meeting demand in the South East would be very small. Furthermore, it is doubtful that they would attract the level of traffic shown above if additional runways were built at major airports in the South East. In practice, passengers and airlines may prefer, even in a highly constrained situation, to fly from more distant, but larger airports outside the SERAS region.

Thanet and I remain absolutely committed to this project and wish to state once again that we will use our best political endeavours in support of anyone who is ready and able to realise the new potential of one of the great assets of British aviation.

Share

🕒 11.48 pm

The Parliamentary Under-Secretary of State for Transport (Mr Robert Goodwill)

I am grateful to my hon. Friend the Member for North Thanet () for securing this debate about the future of Manston airport. In recent years, the increasing demand for commercial air travel has heightened the need to improve the capacity and efficiency of UK airports. This is absolutely essential to meet the Government's commitment to maintain the UK's aviation hub status.

In the 2013 aviation policy framework, we recognised the crucial role that regional airports play in providing airport capacity and the vital contribution they can make to the growth of their local economies. Indeed, I prefer to refer to them as local international airports, rather than just regional airports. We are therefore determined that the UK continues to benefit from the services that regional airports offer, and we welcome the ambition of those that are investing in their infrastructure, increasing accessibility and facilitating more services to more destinations.

I am aware of Manston airport's proud history, which can be traced back to the first world war. It also played a crucial role in world war two, first in supporting troops during the Dunkirk evacuation and then by playing a front-line role during the battle of Britain and providing vital air support during the D-day landings. During the war, the length and width of the runway were improved, meaning that it can now handle the largest jets, such as the new Airbus A380. Manston was even identified as a contingency runway for landings of NASA's space shuttle programme. It was after the war and during the 1960s that the airport began to be used by commercial airlines and enjoyed relatively steady commercial air operations for several years. That allowed many people in the area to experience their first foreign holiday. However, services and passenger numbers declined steadily from the 1970s onwards,

as charter operators moved to larger airports with better surface transport connections. In recent years, Manston has struggled to attract and retain consistent air passenger services, and there have been periods when the airport has had no regular services.

I am aware that Manston airport's owners have begun a consultation with staff regarding the airport's future, and I recognise concerns about the impact its possible closure could have on the local and regional economy. I hope that a resolution can be achieved which sustains the commercial viability of Manston airport to keep it as a going concern. I welcome the news that my hon. Friend held the first meeting of the Manston working group earlier today. The meeting brought together representatives from Thanet district council, Kent county council and the local enterprise partnership, and was supported by Departments to explore options for the airport's future. I commend his tireless work in this regard, but whatever the result of efforts to secure such a resolution, the Government are unable to intervene directly, as we believe that UK airports and airlines operate best in a competitive and commercial environment. It is therefore for individual airports to take decisions on matters of future economic viability.

KLM's decision to discontinue the route between Manston and Amsterdam will undeniably impact the profitability of the airport. The route was the airport's main source of passengers and offered a connection with KLM's international services through the airline's Schiphol hub. The remaining passenger services offered by the airport are mainly summer charter services, and will likely offer limited air traffic. I am aware that Manston also serves as a destination for air cargo operations, as well as a number of aviation maintenance, repair and overhaul, and airframe breaking and spares recovery businesses, which operate on the airport site. As with airports, airlines must take commercial decisions regarding the routes they operate according to what is in their best interests. It is not possible for the Government to compel airlines to operate certain routes.

There have been additional concerns about the closure of the airport and the possible loss of the Lower Airspace Radar Service—LARS—unit, an information service used by some airspace users. Although closure would result in a gap in the LARS system, it would be no larger than elsewhere in the UK. More importantly, the loss of the system would not be seen as a safety-critical issue. We have been assured by the Civil Aviation Authority that the

London Flight Information Service provides an appropriate alternative, and the CAA has stated that it would not support the retention of an airport or air traffic unit for LARS provision, particularly as it is unclear how costs would be covered.

As I said earlier, the UK's aviation sector is overwhelmingly in the private sector and operates in a competitive international market. The Government support competition as an effective way to meet the interests of air passengers and other users. I restate our determination that the UK continue to benefit from the contribution that regional airports can offer. The Chancellor recently announced that applications will now be allowed for start-up aid for new air routes from UK regional airports. To be eligible, airports must handle fewer than 5 million passengers per annum and meet new European Union state aid guidelines. The Department for Transport is working with the Treasury to determine how the funding process will operate in practice, and over this summer will develop guidance for those organisations seeking to make applications for supporting air routes. Should Manston airport be eligible, we would encourage it to apply for this funding.

As hon. Members will be aware, the independent Airports Commission, chaired by Sir Howard Davies, was established to identify and recommend options to maintain this country's status as an international hub for aviation. In preparing its interim report, the commission undertook a detailed assessment of the UK's future aviation demand and connectivity requirements. The commission's interim report, published in December 2013, details its shortlist of long-term options for further study to increase airport capacity along with recommendations for the short term to make the best use of our existing infrastructure.

The commission has explained in the materials supporting its interim report why the expanded use of Manston airport was not selected as an option for further consideration. It concluded that Manston's distance from London and other significant population centres meant that it was unlikely to be able to play a substantial role in meeting future passenger demand in London and the south-east in the long term, although I did hear what my hon. Friend had to say in relation to transport times as opposed to distance.

The commission also recognised that, in the short and medium term, Government do not have effective levers to redistribute traffic to less congested airports such as Manston, even if it were desirable to do so. The Government are carefully considering the recommendations in the interim report and intend to publish a response to the short-term recommendations

shortly. All the shortlisted long-term options will now be the subject of more detailed analysis and consultation by the commission. To protect the integrity of the process, the Government will not comment on any of the shortlisted options.

My hon. Friend also raised the issue of landing and take-off slots in relation to freight. The allocation of slots is governed by EU airport slot regulations, which prescribe the allocation, transfer and exchange of slots at London Heathrow and other “co-ordinated” airports in the UK—that is, those airports where capacity is shown to be insufficient to meet all actual or planned airline operations.

Any decisions about how airlines use the slots allocated to them at busy airports like Heathrow are a commercial matter for those airlines to determine, and that includes freight slots. The European Commission looked at recasting the slot regulation in 2011 as part of the “better airports” package, but progress stalled in late 2012 owing to issues with other aspects of the package. However, the European Commission hopes to reinstate the slots element of the “better airports” package within the European presidency’s transport agenda, and my officials will continue to engage with the process to ensure that the UK aviation sector’s interests are fully represented.

Once again, I thank my hon. Friend for securing this debate. The Government are committed to improving the capacity and efficiency of UK airports to maintain the UK’s aviation hub status. Though fully aware of the importance that regional airports play in this, the Government are unable to intervene directly in the case of Manston. It is ultimately the responsibility of the airport owner to determine whether or not it is commercially viable.

Question put and agreed to.

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🕒 11.58 pm

House adjourned.

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8. Manston

Over the past five years or so there has been a great deal of interest in the future of aviation on the site of the former Manston Airport.

There has been no functioning airport on the site for four years and its owners currently have a planning application to turn the site into a mixed-use area comprised of homes and business premises. A rival proposal to reinstate aviation operations on the site was withdrawn in May 2018.¹¹⁶

The former RAF Manston was purchased by a New Zealand company, Infratil, in August 2005 for £17 million. Over the next eight years commercial passenger services from the airport were operated by Flybe, Monarch and KLM. In October 2013 Infratil announced they would sell Manston Airport for £1 to a company called Manston Skyport, owned by Ann Gloag, co-founder of Stagecoach Group. It began running the airport in November 2013. Manston Skyport announced its intention to close Manston airport in March 2014, less than four months after its purchase. The airport closed in May 2014 and its commercial aerodrome licence was returned to the CAA.

While the chances of any passenger operations returning to Manston are probably slim, there is a proposal to turn it into a 'freight hub', championed by Sir Roger Gale MP, RiverOak and others.¹¹⁷ In May 2018 RiverOak explained their proposals to turn Manston into "a hi-tech, efficient operating environment ... a very compelling proposition for the air cargo market".¹¹⁸ They are supported by the [Supporters of Manston Airport](#) campaign group. The Government's view is one of tacit support for the return of aviation operations but has insisted that it is a matter for the local community, the owners and the local authority.¹¹⁹

The Manston site was used as a temporary lorry park in Summer 2015 during Operation Stack.¹²⁰ The Government has said that the site is not included in its long-term plans to deal with congestion to and from the Channel ports after Brexit.¹²¹

A summary of the Manston case can be found in the Transport Select Committee's report [Smaller Airports](#) (Ninth Report of Session 2014–15), HC 713, 13 March 2015.

¹¹⁶ ["Plans to re-open Manston Airport have been 'temporarily' withdrawn"](#), *Kent Live*, 8 May 2018; details of what is happening at Manston can be found on the [Thanet Council website](#)

¹¹⁷ RiverOak Investments media statement, ["Government confirms support for an air freight hub at Manston"](#), 15 September 2016

¹¹⁸ RiverOak Investments media statement, ["RiverOak Strategic Partners parliamentary briefing focuses on the hi-tech potential for Manston to improve air cargo productivity"](#), 23 May 2018

¹¹⁹ [HC Deb 15 September 2016. c1020](#)

¹²⁰ this is explored further in: Transport Committee, [Operation Stack](#) (First Report of Session 2016–17), HC 65, 1 June 2016

¹²¹ [HC Deb 14 May 2018. c68](#)

Ramsgate Conservation Area

In 2017 Ramsgate was named one of only 10 Heritage Action Zones in England and the first in the South East. Ramsgate is rich in heritage with over 450 listed places, including 443 listed buildings 1 scheduled monument, 1 registered park and a number of shipwrecks off the coast. This includes the *Rooswijk* whose finds, as part of a major international project, are currently being brought ashore to be investigated in Ramsgate.

Ramsgate's Conservation Areas

The great variety of heritage in Ramsgate is reflected in the different characters of the three main conservation areas within the Heritage Action Zone. These are: Ramsgate Royal Esplanade Conservation Area, Ramsgate Conservation Area and Ramsgate Montefiore Conservation Area.

Ramsgate Royal Esplanade Conservation Area was designated in 2006 and is based around an area designed in the 1920s especially for leisure purposes. The area is described by the Conservation Area Appraisal as having two different character areas – that around the former Bon Secours Nursing Home (a Grade II listed 18th Century house) and the other the planned leisure landscape of Royal Esplanade itself which includes a promenade and large open green spaces. The buildings in the area date mainly from the 1920s complete with croquet lawns, bowling greens and a boating lake. The most noticeable buildings highlighted in the appraisal include the former tea pavilion, the club house for the croquet and bowls club and the 18th Century House part of the grounds of which were incorporated into the 20th Century scheme. You can also still see the cliff lift designed for easy access to the beach, and some beautiful cast iron shelters. The challenges faced by this conservation area include underuse, a large backlog of repairs related to the historic structures and a lack of heritage interpretation - so people are unable to explore and understand the story of this place.

Sitting alongside the Ramsgate Royal Esplanade Conservation Area is the centrally located Ramsgate Conservation Area. This is the largest of the three conservation areas in Ramsgate and the earliest to be designated in 1970 and later extended. The conservation area takes in most of the town centre from the listed buildings near the top of the High Street (including the 17th Century Grade II listed Sylvian hotel), to The Grange in the west (designed by Augustus Pugin, one of Britain's most influential architects who also designed interiors of the Houses of Parliament) and stretching as far east as the Pullhamite rock constructed Winterstoke Gardens (another 20th Century leisure landscape designed specifically for strolling and contemplation). This conservation area includes the most defining features of Ramsgate – the Royal Harbour. Construction began in 1750 to create a harbour specifically designed to offer refuge for sailing vessels caught from storms in the Channel. Still a working harbour it is a striking monument to the amazing feats of Georgian engineering. Ramsgate's harbour has a wealth of stories to share around the Dunkirk evacuation, the royal connection to George IV, smack boys, maritime rescue and much, much, more. Part of the challenge of this conservation area, and the Harbour in particular, is sharing those stories as there is currently no

interpretation, as well as capitalising on the underused spaces in nearby historic buildings. The Winterstoke Gardens face additional challenges around anti-social behaviour and vandalism as well as some much needed repairs.



Ramsgate's Royal Harbour. © Historic England

The final conservation area in Ramsgate is the Ramsgate Montefiore Conservation Area designated in 2007. Based around the Montefiore Synagogue built in the early 1830s, this conservation area is much smaller in size and lies just north west of Winterstoke Gardens. Excitingly this is the only known example in the country of a synagogue built on a private estate and only the second synagogue to be built for Sephardic Jews. Jewish Heritage UK list it as one of Britain's top ten historic synagogues. Sadly like the Winterstoke gardens the isolated nature of the historic buildings and structures in this area, mean they are often the victim of vandalism and anti-social behaviour.



The Montefiore Synagogue. © Historic England

Ramsgate Today

Once a thriving and prosperous town with an economy based on agriculture, fishing and tourism, large parts of Ramsgate are now in the 10% most deprived in the country according to the Index of Multiple deprivation. Despite of the richness of its historic environment, Ramsgate has a poor self-image, significant socio-economic problems and many of its heritage assets have been neglected because their economic and cultural worth are not fully understood or recognised.

Opportunities for the Future

Some assets, like the extensive network of tunnels under the town, are beginning to develop as tourism and visitor attractions. The Harbour is recognised for its role in the evacuation of Dunkirk but there is much more to the town than just this WWII story. From evidence of a Neolithic causewayed enclosure to the west, to industrial activity from Roman times in the Harbour, and on through the Gothic Revival inspired by Augustus Pugin, Ramsgate has a wealth of architectural and historic stories which the Heritage Action Zone will look to capitalise on so that the benefits and value of Ramsgate's heritage can be maximised for the local population and contribute towards the economic growth of the town.

In particular the Heritage Action Zone in Ramsgate will focus on:

- Enabling the heritage of Ramsgate to be better understood, enjoyed, valued and protected.

- Engaging the local community of Ramsgate and increase participation with the historic environment
- Raising awareness of Ramsgate as a heritage destination
- Developing and improving heritage related capacity and skills in Ramsgate
- Promoting heritage management best practice and raise design standards and quality

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4. Baseline

4.1 Site location and topography

The site is located south of Margate and west of Ramsgate, within the district of Thanet in north-east Kent. It is bounded by the A299 Hengist Way to the south and the B2190 Spitfire Way to the north-west, and is bisected by the B2050 Manston Road in the northern part of the site. Areas of farmland border the east and west. The villages of Manston, Minster and Cliff's End lie 500m to the east, 1km to the south-west and 800m to the south-east respectively. The site covers an area of approximately 296 hectares (732 acres), comprising buildings and features associated with the airport infrastructure, including the runway, taxiways, aprons, cargo facilities and passenger terminal, and two buildings housing the Spitfire and Hurricane Memorial Museum and RAF Manston Museum. The buildings are clustered along the east and north-west boundaries of the site, with the 2748m long, 60m wide tarmacked runway, orientated in an east-west direction across the southern part of the site. The remainder of the site includes areas of hardstanding, large expanses of grassland, and some limited areas of scrub and/or landscaping.

The Proposed Development site is mainly situated at an elevation between 40-55m AOD. The southern portion is located at an elevation of approximately 50m AOD, along the length of the existing runway, but rises to approximately 55m AOD in the western most corner of the site. North of the runway the site level falls to approximately 40m AOD, in the west, at the Spitfire Way Junction (crossroads of the Manston Road (B2050) and the Spitfire Way (B2190)), while remaining at 45-50m AOD in the northern most part of the site. Telegraph Hill, at the west end of the site, is a high point in the surrounding landscape, while the existing runway is roughly sited along the length of a ridge running east from Telegraph Hill.

4.2 Geology

The site is underlain by bedrock Margate Chalk Member of the upper Newhaven Chalk Formation, overlain by the sands and silts of the Thanet Formation along the site's northern boundary. The superficial drift deposits overlying the site are variable, with some areas having no superficial geology (predominately in the south of the site) interspersed with areas of Head Formation, comprising Clay and Silt.

4.3 Historic landscape character

The site is part of Kent Historic Landscape Character Area 18: Isle of Thanet. Unsurprisingly, most of the site lies within an historic landscape character area defined as 20th century airfields. This represents the dominant historic land-use of the site itself for over a century, with extant features, including the airfield runway, hangars, towers and pillboxes reflecting both its military past and recent commercial aviation history. The east and west areas of the site are characterised as irregular fields bounded by roads, tracks and paths. The majority of the area in close proximity (1km) to the site is also predominantly irregular fields bounded by roads, tracks and paths, interspersed with post-1800 scattered settlements with paddocks, and post-1810 settlements. An area of industrial complexes is adjacent to the site at the northwest, with a caravan site in close proximity to the northeast and a reservoir and water treatment area to the south. It is thought that these relatively recent historic landscape character types may overlay an historic landscape character of irregular fields bounded by roads, tracks and paths, possibly relating to post-medieval informal enclosures. This is discernible in the post medieval field and boundary system visible in aerial photographs which still reflects that of historic maps. The mudflats of Pegwell Bay are within 2km of the south-east of the site.

Overall, the site lies within an area of local and regional historic significance due to its location on the Isle of Thanet. Until approximately 1000 years ago, this area of north-east Kent was an island separated from the mainland by the Wantsum Channel until it silted up in the 16th century, creating a unique landscape, with its development and activities governed by its geographical position.

4.4 Designated heritage assets

There are no designated heritage assets on the site, although there are some designated heritage assets within the study area as detailed below. A gazetteer of designated heritage assets is provided as Appendix B, these are shown on Figure 2.

World Heritage Sites

There are no World Heritage Sites (WHS) within the study area. The nearest WHS, Canterbury Cathedral, St Augustine's Abbey and St Martin's Church in Canterbury, is located 16km southeast of the 1km study area.

Scheduled monuments

There are two Scheduled Monuments (SM) within the 1km study area which are both within close proximity to the site:

The nearest scheduled monument to the site is the Anglo-Saxon Cemetery south of Ozengell Grange (List Entry 1004228), which is located 100m to the east of the site. Partial excavation since the mid-19th century has recorded over 100 Anglo-Saxon burials, many with grave goods, on or in the vicinity of the site. Further archaeological remains survive in the vicinity of this site but are not included because they have not been formally assessed (i.e. partial excavation near Ozengell Grange, to the north of the monument, has recorded several hundred Anglo-Saxon burials, which are likely to be part of the same inhumation cemetery); and

Enclosure and ring ditches sited 180m east-northeast of Minster Laundry (List Entry 1004203) and located directly south of the A299 which forms the southern boundary of the site. The features recorded as crop marks on aerial photographs represent the surviving ditches of a Romano-British and Iron Age settlement.

Listed buildings

There are no listed buildings within the site, however there are 24 listed buildings surrounding the site within the 1km study area. The nearest listed building is the Grade II Remains of Monastic building (List ENTRY 1085443), situated 35m to the east. These assets are detailed in Table 4.1 below.

Table 4.1 Listed buildings within the study area

Listing ID	Name	Grade	Distance from site
1224593	Wayborough Manor	II*	570m to south
1224683	Cleve Court and Cleave Lodge	II*	220m to north west
1336669	Barn about 50m east of Ozengell Grange	II*	430m to north east
1085377	Ozengell Grange	II	400m to north east
1085409	53 and 55 Foad's Lane	II	820m to south
1085442	Grove Farmhouse and Walled Front Garden	II	500m to east
1085443	Remains of Monastic Building	II	35m to east
1085444	Barn at Preston Farm	II	680m to east
1085445	Barn at Manston Green	II	450m to east
1204244	Flete Lodge	II	580m to north east
1223803	Cheeseman's Farm	II	760m to north
1224336	Chapel House	II	480m to south

Listing ID	Name	Grade	Distance from site
1224337	Psalm Cottage	II	920m to south west
1224339	Rose Cottage and Pansy Cottage	II	675m to south
1224448	Prospect Inn	II	150m to west
1224499	Bay Tree Cottage	II	950m to south west
1224545	Tudor Cottage	II	660m to south
1266885	Rose Cottage	II	920m to south west
1266887	Way House and Wayborough House, and attached Garden Wall	II	350m to south
1336624	Old Forge House	II	480m to east
1336625	Manston Court and adjacent Wall	II	60m to east
1336626	Granary about 25m south of Manston Court Farmhouse	II	50m to east
1429581	Eastern of two Concrete WWII 4-inch gun emplacements	II	950m to south east
1430779	Manston War Memorial	II	445m to east

Designated assets outside the study area

As agreed with Kent County Council, the significant heritage assets Monastic grange and pre-Conquest nunnery at Minster Abbey (List Entry 1016850) and Saxon Shore fort, Roman port and associated remains at Richborough (List Entry 1014642), which lie outside of the approved study area, are included in this assessment (Figure 3).

The scheduled monument Monastic grange and pre-Conquest nunnery at Minster Abbey (List Entry 1016850) is located c. 1.3km to the south of the eastern of the site. Situated on low-lying ground near the eastern edge of the town of Minster, the nunnery, built in AD 741, is represented by below ground traces of buildings and associated remains, which survive beneath the later monastic grange. Built in the 12th Century by Benedictine monks, the grange served as the main administrative centre for their farmlands. The grange survives in the form of standing buildings, water-filled fishponds and associated below ground remains. The main grange buildings were arranged around a square, east-west aligned courtyard. The standing buildings (List entry 1223807) are Listed Grade I and incorporate the northern hall range and attached western range, along with the ruined fragment of a square tower which adjoins the southern end of the western range. It was subsequently altered in the 15th, 17th, 19th and 20th centuries.

The Saxon Shore fort, Roman port and associated remains at Richborough (list entry 1014642) is located c. 5km to the south of the site. The monument includes an area of c.40ha containing a variety of archaeological components dating from the Iron Age, Roman and medieval periods, situated on a low sandy promontory around 2.5km from the present coastline of eastern Kent. The earliest known use is an Early Iron Age Farmstead, which was followed by the landing of part of the Roman invasion force here in AD 43 and subsequent temporary camp. This became a Roman military and naval supply base, and then a Roman port and associated settlement which was fortified in the third century. Within the area of the Saxon Shore fort scheduled monument lies the Grade I Richborough Castle (List entry 1363256). It contains the remains of the Roman settlement of *Rutupiae*, and the three sides of the late third Century Saxon shore fort, with additional areas dating to the 10th and 12th centuries.

Conservation Areas

There are no conservation areas within the 1km study area, however the conservation areas of Acol and Minster in Thanet are both situated c. 1km to the north-west and south-west respectively. The conservation

areas of St. Nicholas at Wade, c. 5km to the west; Ramsgate, c. 3.5 km to the east; and Broadstairs, c. 5km east-north-east of the site are likely to be under the flight path (Figure 3).

Registered Parks and Gardens

There are no Registered Parks and Gardens (RPG) within a 1km radius around the site. The nearest RPG is grade II* registered Goodnestone Park which is 11km beyond the 1km study area.

Registered Battlefields

There are no Registered Battlefields in Kent.

4.5 Non-designated heritage assets

There are over 800 previously identified non-designated heritage assets within the site and the 1km study area, including archaeological remains from the prehistoric through to modern times; the latter including various phases of use of the airport. These, in addition to its situation within an archaeologically sensitive area due to its geographic location, indicates long term human activity within the area ranging from the prehistoric period to the present day.

Non-designated heritage assets are mapped in Figure 4 (Appendix A: Figures), tabulated in Appendix B and described within the site chronology below.

4.6 Site chronology

Early prehistory: Palaeolithic and Mesolithic hunter gatherers

Internationally significant sites with evidence for some of the earliest human occupation in the UK have been found in the county of Kent along the banks of the River Thames. The county is recognised for significant and nationally rare finds relating to the early prehistoric era in Britain. Early human activity during the Palaeolithic period (c. 700,000 to 10,000 years BP) consisted of the transient and intermittent movements of hunter-gatherers through the local landscape (e.g. in order to follow herds of animals, fish or collect useful and/or edible plants) which tends to leave only ephemeral traces of activity or isolated findspots of artefacts in the landscape. Most commonly found are lithic artefacts, including handaxes and various flake and blade flint tools, although bone and antler artefacts begin to appear during the Upper Palaeolithic.

The Mesolithic period (roughly 10,000 to 5,500 BP) saw a transition towards the use of seasonal or permanent occupation sites. While many continued the hunter-gatherer lifestyle, initial stages of domestication have been observed. Lithic technology is dominated by microliths during this period.

The Stour Basin characterisation project (Mason, S., pers comm) identifies the site as within two specific areas. The runway and majority of the operational buildings are characterised as of very low potential as a result of potential denudation of superficial deposits in the later parts of the Last Glacial and during any subsequent Holocene slopewash activity. Areas to either side of Spitfire Way and around the village of Manston are characterised as of moderate potential owing to the possible presence of loessic deposits which were not denuded during Holocene slopewash. This is supported by artefactual evidence which indicates potential transient occupation in the area during this period.

Residual evidence on the site includes a Palaeolithic flake recovered from a later feature on the southern boundary during excavations on the East Kent Access road carried out by a joint venture between Oxford Archaeology and Wessex Archaeology in 2009-2011 (TR 36 NW 546); and a Lower to Middle Palaeolithic pointed implement recovered as a surface find in 1899 from the Telegraph Hill area of the site (TR 36 NW 55). Within the study area c. 0.7km to the north-west of the site, a Middle Palaeolithic lithic working site, comprising 18 flakes, a blade core, two scrapers and a small cordate handaxe of Mousterian appearance, identified during an evaluation in 2003 by Canterbury Archaeological Trust (TR 36 NW 489), is thought to be fairly in situ. A Lower to Middle Palaeolithic handaxe was excavated by Wessex Archaeology in 2006 c. 1km north-east of the site (TR 36 NE 2403).



Aircraft Climb Performance

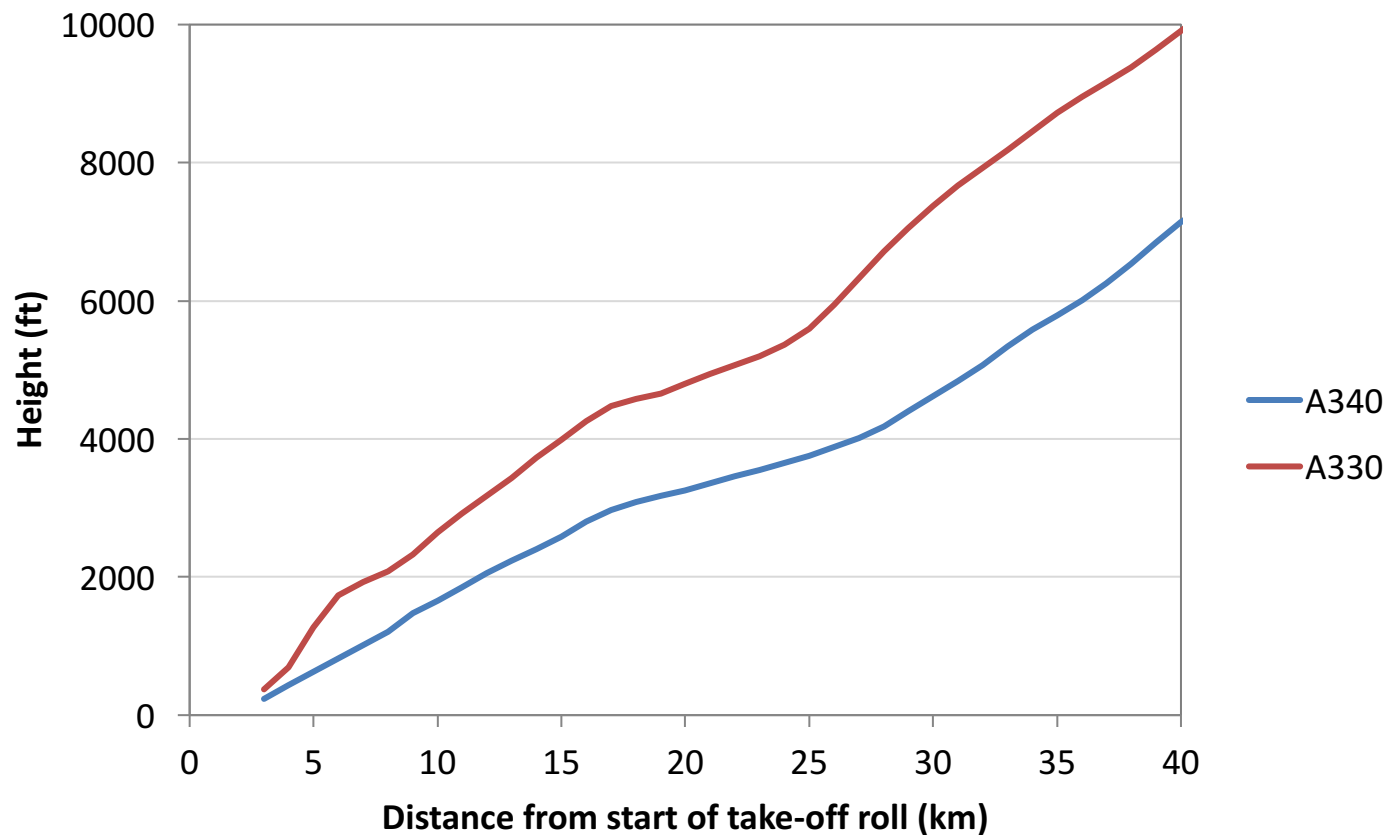
Dr Darren Rhodes
Civil Aviation Authority

Capt Spencer Norton
British Airways

16 February 2017

2 and 4-engined aircraft climb profiles

- South African Airlines to Johannesburg: A330 vs A340



747-200 descent over Royal Harbour

(video taken from Ramsgate pier, approx 2.2NM from EoR, altitude approx 660ft)

<https://www.youtube.com/watch?v=VQkFhyklbCI>





Manston Flight over Ramsgate Garden

(video taken from Southwood Gardens, approx 1.33NM from EoR, altitude approx 399ft)

<https://www.youtube.com/watch?v=4ub-PILLb-4>

Please also read Relevant Representation of videographer at

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipcsection=relreps&ipcsearch=woolcott+ellis&relrep=29244>



Manston Flight over Ramsgate Garden

(video taken from Southwood Gardens, approx 1.33NM from EoR, altitude approx 399ft)



A STATEMENT ON THE LIKELY OUTCOME FOR RAMSGATE IN THE EVENT OF A REVIVAL OF MANSTON AIRPORT

INTRODUCTION

This statement is being produced because the Town Council has been criticised for not directly participating in the examination of the case for reviving and expanding commercial aviation at Manston Airport.

The Town Council refrained from commenting on the proposal because it was:

- (a) outside the boundary of the Council's area.
- (b) The application is highly technical, is beyond the expertise of the Council, and is being critiqued by many other organisations in any case.
- (c) It was felt that the Council could not add anything of any substance to the proceedings in most subjects.
- (d) The Council does not hold a unanimous view on the viability of the RSP application and this may also accord with the views of some residents within Ramsgate.

The open floor hearings however give an opportunity to outline the Council's concerns on certain areas of concern to the Council and its residents in Ramsgate.

Those concerns are as follows:

- The impact on the local economy of Ramsgate, especially the tourist sector.
 - The likely impact on employment during any period between granting of a DCO and implementation of a fully functioning airport and thereafter.
 - The impact on the local infrastructure.
 - The impact on social cohesion within Ramsgate.
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THE IMPACT ON THE LOCAL ECONOMY OF RAMSGATE

Ramsgate has a population of around 44,000 people depending on which sources one consults. The area of the Town has been occupied in one form or another since the last ice age. Historic England in its survey work for the Heritage Action Zone (HAZ) has identified signs of permanent settlements dating back to the Neolithic period. There are also numerous Bronze Age barrows and enclosures. These findings are due to be published this year.

Modern Ramsgate as an entity dates from the 17th century, with the area around Harbour Street being the oldest part of the Town.

From that period until 1884, Ramsgate was administered from Sandwich, which is Cinque port head port. Ramsgate is a corporate member of the Cinque Ports. In 1884, Ramsgate was incorporated and ran its own affairs until 1974, when it became part of Thanet District Council. In 2009, Ramsgate Town Council was formed.

For many years Ramsgate's economy relied on tourism, infrastructure (especially railways and the supply of coal gas, fishing and shipping in a trading relationship with the Benelux Countries and North Germany).

Since 1974, Tourism has declined and changed from its peak in 1950's in providing the traditional seaside holiday, towards day and short break visits. Nevertheless, this sector recorded 4.2m visitors for the whole of Thanet and added £319m to the economy of Thanet (source Visit Kent survey published 8th January). A significant portion of those figures originated in Ramsgate. This sector is now so important to the economy of Ramsgate, that the Thanet District Council economic plan speaks of little else, but the 'Café society'.

In addition, there is a small inshore fishery, a small ship repair sector, a growing windfarm maintenance sector and one of the most picturesque and strategic yacht marinas on the South Coast within the Royal harbour.

Ramsgate also has various industrial parks which afford the usual range of workshops and retail outlets. The retail trade in Ramsgate is facing challenging times, because of competition from the internet, a general reduction in conventional retailing and a lack of consumer confidence. Ramsgate Town centre has a number of void properties and many that are not trading in a conventional form.

Of these sectors, Tourism, retail and hospitality are the sectors most likely to be affected by the resumption of commercial aviation as any likely flight path will cover the harbour frontage and commercial areas of Ramsgate. These sectors are also most reliant on outside private investment for their start up and ongoing financial sustenance.

A possible investor in a business in Ramsgate is likely to consider whether that business will be successful if it is located within reasonable proximity to a flight path. He/she will weigh up the risk in terms of will visitors continue to visit Ramsgate, when they could be subjected to the noise and spectacle of an aircraft or will they instead choose one of Ramsgate's many competitor resorts on the South Coast. We believe that it is not an unreasonable speculation to put this possibility to the Planning Inspectorate as an item to be weighed in the balance when considering the application.

Certainly, it calls into question any proposals for a Marina village or the Pleasurama site. If the airport application were successful, investor confidence would be in question and therefore the only other source of investment would be from the public sector, which has shown great reluctance in the past to invest in Ramsgate. Of course, a successful airport project may derive copious employment opportunities for Ramsgate residents, but there is bound to be an interim period when new investment in Ramsgate reduces and yet the new airport facility is still in vitro as it were. What happens in that situation?

In accordance with
Section 441 of the
Companies Act 2006.

AA02

Dormant company accounts (DCA)



Companies House

You can use the WebFiling service to file dormant company accounts online.
Please go to www.companieshouse.gov.uk

✓ **What this is for**
You may use the AA02 'Dormant company accounts' (DCA) for accounting periods beginning on or after 6th April 2008. Please read the guidance in Section 6 before completion.

✗ **What this is NOT for**
You cannot use the AA02 accounting period begins 6th April 2008.

FRIDAY



L73B07K9

LD6

06/04/2018

#10

COMPANIES HOUSE

1 Company details

Company number

Company name in full RIVEROAK STRATEGIC PARTNERS LIMITED

→ Filling in the DCA

Please complete in typescript or in bold black capitals.

All fields are mandatory unless specified or indicated by *

2 Date of balance sheet

Date of balance sheet ^d 3 ^d 1 ^m 0 ^m 7 ^y 2 ^y 0 ^y 1 ^y 7

3 Accounts

	Current Year	Previous Year
Called up share capital not paid	£ 1	£
Cash at bank and in hand	£	£
Net assets	£ 1	£
Issued share capital		
Number of shares	Class of shares	
1	ORDINARY of £ 1 each	1
Shareholders' fund		£ 1

Statements

For the below year ending the company was entitled to exemption from audit under section 480 of the Companies Act 2006 relating to dormant companies.

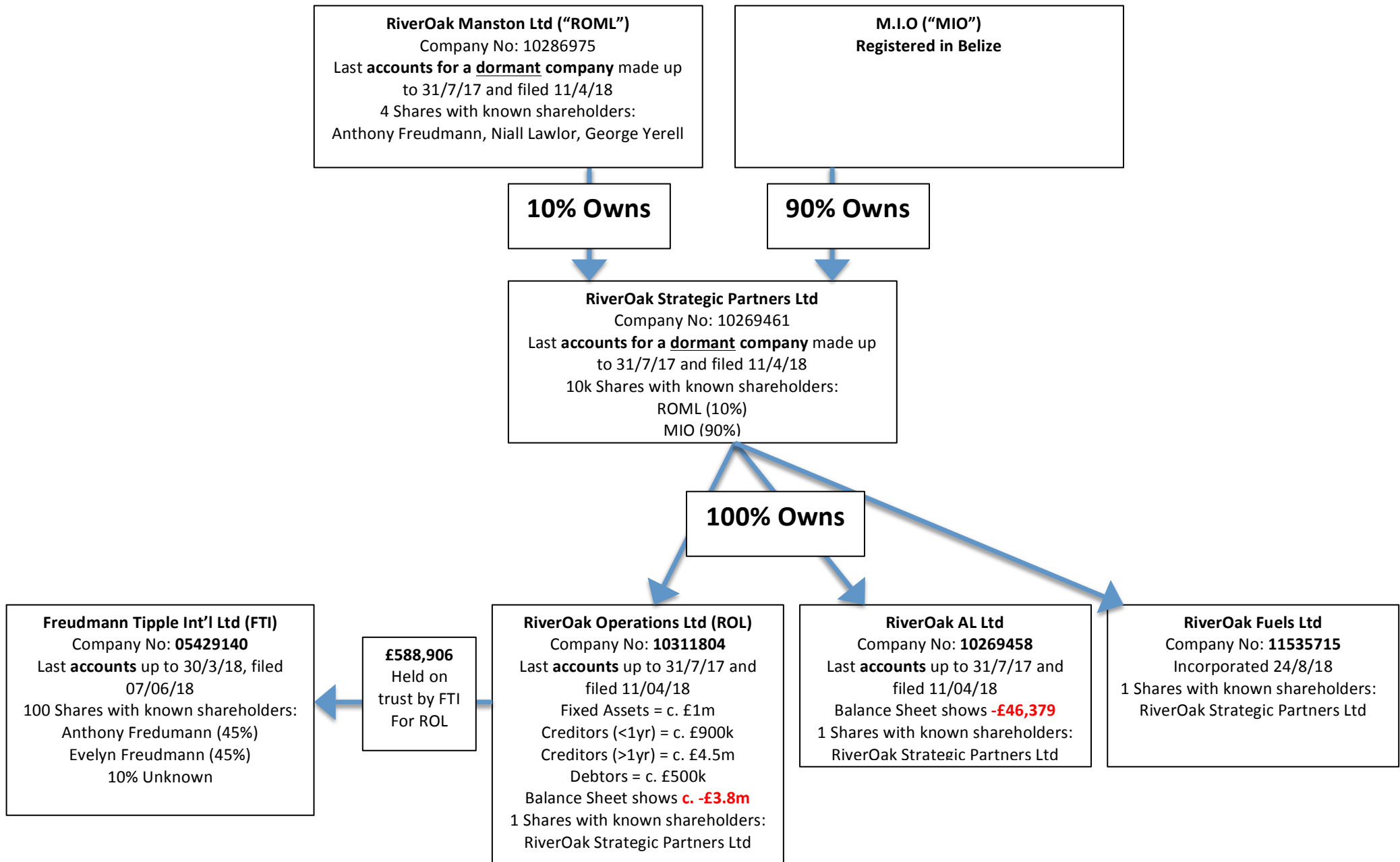
For the year ending ^d 3 ^d 1 ^m 0 ^m 7 ^y 2 ^y 0 ^y 1 ^y 7

Directors' statements:

- The members have not required the company to obtain an audit of its accounts for the year in question in accordance with section 476, and
- The directors acknowledge their responsibilities for complying with the requirements of the Act with respect to accounting records and the preparation of accounts.

These accounts have been prepared in accordance with the provisions applicable to companies subject to the small companies' regime

☐ Please tick the box if during the year the company acted as an agent for a person.





**CERTIFICATE OF INCORPORATION
OF A
PRIVATE LIMITED COMPANY**

Company Number 11720590

The Registrar of Companies for England and Wales, hereby certifies that

RIVEROAK MSE LIMITED

is this day incorporated under the Companies Act 2006 as a private company, that the company is limited by shares, and the situation of its registered office is in England and Wales

Given at Companies House, Cardiff, on 10th December 2018



* N11720590C *



Companies House



THE OFFICIAL SEAL OF THE
REGISTRAR OF COMPANIES



National Infrastructure Planning
Temple Quay House
2 The Square
Bristol, BS1 6PN

Customer Services: 0303 444 5000
e-mail: ManstonAirport@pins.gsi.gov.uk

RiverOak Strategic Partners
c/o Angus Walker
Bircham Dyson Bell
By email

Your Ref:

Our Ref: TR020002

Date: 14 August 2018

Dear Mr Walker

Planning Act 2008 – Section 51

Application by RiverOak Strategic Partners for an Order Granting Development Consent for the upgrade and reopening of Manston Airport

Advice following issue of decision to accept the application for examination

On 14 August 2018 the Secretary of State decided to accept the above application for examination.

This letter comprises advice to the Applicant provided under s51 of the Planning Act 2008 (PA2008). It should be read in conjunction with the Manston Airport s55 Acceptance of Applications Checklist (the Checklist) issued alongside the Acceptance decision.

In applying the Acceptance tests to the application documents, the Planning Inspectorate noted some omissions/ discrepancies in the information provided, about which the appointed Examining Authority (ExA) is likely to seek resolution early in the Pre-examination stage.

The Applicant is strongly advised to pay close attention to the content of this letter, and consider carefully how appropriate action might be taken in response to the advice issued within it.

The Funding Statement (Doc 3.2)

As reflected in Box 30 of the Checklist, the Inspectorate considers that the Funding Statement poses substantial risk to the examination of the application. In respect of this, the Applicant is advised to be fully conversant with statute and guidance contained in The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and in Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land.

The issues raised in advice provided by the Inspectorate at the Pre-application stage, in consideration of draft iterations of the Funding Statement provided by the Applicant for review, has only partially been satisfied. On this basis the Inspectorate considers that the following information is very likely to be requested by the appointed ExA early in the Pre-examination stage:

- In the generality, further evidence that adequate funds will be available to enable the Compulsory Acquisition of land and rights within the relevant time period.
- Further information in respect of RiverOak Strategic Partner's (RSP) accounts, shareholders, investors and proof of assets.
- Further clarification in respect of the term "*completion of the DCO*" (Funding Statement para 12, 13, 27).
- Further details of RSP's Directors, staff, auditors etc.
- Further details of the funders who have already expressed interest and others that are likely to come forward (Funding Statement, para 23).
- Further justification as to why Article 9 of the draft DCO is appropriate and provides sufficient security for individuals in consideration of the provisions of the Human Rights Act 1998.
- Further information on the sources and availability of funding for the Noise Mitigation Plan.
- Further information on the joint venture agreement (Funding Statement, para 19 etc).
- Further details of how the costs set out in the Funding Statement at paragraph 15 have been estimated.
- Further evidence to support various statements such as:
 - "*The investors are willing to underwrite the cost of any blight claims or eventual claims in compensation [...]*" (Funding Statement, para 10).
 - "*RiverOak anticipates that it will raise further equity and debt finance following the making of the DCO in order to develop the authorised development to completion*" (Funding Statement, para 11).
 - "*[RiverOak] have drawn down £500,000 from their investors*" (Funding Statement, para 20).

The Environmental Statement (Doc 5.2)

The Applicant has omitted the figures from the Report to Inform the Appropriate Assessment (Doc 5.2-6, Appendix 7.1). The appointed ExA is likely to request for the omitted figures to be provided early in the Pre-examination stage.

Chapter 7 of the Environmental Statement (ES) (Biodiversity) and the Report to Inform the Appropriate Assessment (Doc 5.2-6, Appendix 7.1) reference discussions with Natural England that have arisen since the s42 consultation. The Applicant is advised that the appointed ExA is likely to request, early in the Pre-examination stage, evidence of those subsequent discussions with Natural England and any other statutory body regarding the ecological effects of the Proposed Development that have been undertaken subsequent to the consultation.

The appointed ExA is likely to request for the Applicant to confirm its timeline for the provision of the outstanding ecological survey data required, and to confirm its worst case assessment of ecological effects arising from the Proposed Development and the extent of mitigation required.

The ES and draft DCO (Doc 2.2) provide a similar but inconsistent description of the development footprint within the Northern Grass area eg ES Figure 3.6 (106,125 sq m), ES Volume 1 paragraph 3.3.94 (105,100 sq m) and the draft DCO, Schedule 1 (116,000 sq m). The appointed ExA is likely to seek clarification in respect of this inconsistency, and crucially confirmation about which figure is correct, early in the Pre-examination stage.

The appointed ExA is also likely to request details regarding the proposed dimensions of the “*site gatehouse*” shown in ES Figure 3.1 and mentioned in Table 11.68 of the ES.

Figure 3.1 of the ES (Doc 5.2-4) refers to the relocation of the existing Ministry of Defence (MoD) aerial, however this is not mentioned in the ES or the draft DCO. The appointed ExA is likely to seek for the Applicant to confirm its intentions for the MoD aerial.

Paragraph 3.1.11 of the Flood Risk Assessment (Doc 5.2.8) and paragraph 6.3.2 of the Transport Assessment (Doc 5.2-15), in providing summaries of the works to be undertaken as part of the Proposed Development, refer to the relocation of the RAF Manston Museum. This is contradicted by paragraph 3.3.104 of the ES which states that the museum will be retained and proposals have been prepared for a new Spitfire and Hurricane Memorial Museum only. This in turn appears to be contradicted by the Planning Statement (Doc 7.2) which states at paragraph 3.85 that the RAF Manston Museum and the Spitfire and Hurricane Memorial Museum will remain on site, with an area of land being safeguarded for these facilities. The appointed ExA is likely to seek for the Applicant to confirm its intentions for the RAF Manston Museum and for the Spitfire and Hurricane Memorial Museum.

The Consultation Report (Doc 6.1 and Doc 6.2)

In respect of s42(1)(a) prescribed persons, it appears on the basis of the information provided by the Applicant that the potentially relevant persons identified in Box 6 of the Checklist were not consulted at the Pre-application stage.

Unless there is a good reason in each case why the Applicant considers that these persons are not relevant to the Proposed Development, the Applicant is advised to include these persons, or their appropriate successors, in its s56 notification exercise or to otherwise proactively draw their attention to the Relevant Representation period.

Electronic application documents

A number of RSP’s application documents corrupted during the redaction process undertaken by the Planning Inspectorate prior to publication. This problem has previously been encountered with application documents submitted by other applicants. As an interim solution, those documents have been manually redacted, scanned, and exported to the website. In this format, crucially, the text comprising the documents is not searchable.

The corrupted documents are:

- ES Volume 1: Main Text – Chapters 1-10 (Doc 5.2-1).
- ES Volume 6: Appendices 1.4 – 7.2 (Doc 5.2-6).
- ES volume 7: Appendices 7.3 – 8.1 (2 of 3) (Doc 5.2-7).
- ES Volume 8: Appendices 8.2 – 9.1 Part A (2 of 3) (Doc 5.2-8).
- ES Volume 25: Appendices to the Transport Assessment (2 of 3) (Doc 5.2-25).

By **close of play on Friday 17 August 2018** can the Applicant please provide additional versions of the above documents in order that the Inspectorate may replace the corrupt versions on its website to allow unhindered inspection of their content?

I trust that this advice is useful to you and that it will aid your preparation for the examination of the application. If you have any questions about the content of this letter, please do not hesitate to contact me using the details provided.

Yours sincerely

Richard Price

Richard Price
National Infrastructure Case Manager

Tel. 0303 444 5654

This communication does not constitute legal advice.
Please view our [Privacy Notice](#) before sending information to the Planning Inspectorate.

747-200 descent over Royal Harbour

(video taken from Ramsgate pier, approx 2.2NM from EoR, altitude approx 660ft)

<https://www.youtube.com/watch?v=VQkFhyklbCI>





Manston Flight over Ramsgate Garden

(video taken from Southwood Gardens, approx 1.33NM from EoR, altitude approx 399ft)

<https://www.youtube.com/watch?v=4ub-PILLb-4>

Please also read Relevant Representation of videographer at

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/manston-airport/?ipcsection=relreps&ipcsearch=woolcott+ellis&relrep=29244>



Manston Flight over Ramsgate Garden

(video taken from Southwood Gardens, approx 1.33NM from EoR, altitude approx 399ft)



Area	Location	Type	Distance from end of runway (NM)	Est. altitude of cargo planes overhead	Associated Relevant Representation (RR)	RR Ref
Nethercourt	Windermere Avenue	Residential	0.81	243	Nethercourt Action Group	RR-1419
Nethercourt	Nethercourt Touring Park	Recreational	1.17	351	Nethercourt Touring Park	RR-1420
Southwood	Ramsgate Football Club	Recreational	1.32	396		
Southwood	Southwood Gardens	Residential	1.33	399	Lee Woolcott-Ellis	RR-1012
St Lawrence	St Lawrence Church	Place of Worship	1.37	411	Samara Jones-Hall	RR-1754
St Lawrence	Warre Recreation Ground	Recreational	1.41	423		
St Lawrence	Ellington Infant School	School	1.43	429	Chloe Ralph Harding	RR-0266
St Lawrence	St Lawrence in Thanet Junior Academy	School	1.43	429	Ms Rose Lake	RR-1390
Ellington	Ellington Park	Recreational	1.5	450	Katharine Walters	RR-0935
Ramsgate Centre	Christ Church Church of England Jr School	School	1.61	483	Ms Rose Lake	RR-1390
SW Ramsgate	The Grange (Pugin)	Heritage	1.62	486	Gabriel Holland	RR-0569
Westcliff	Ramsgate Croquet Club	Recreational	1.67	501		
Westcliff	Westcliff Promenade	Recreational	1.68	504	Georgina Rooke	RR-0603
SW Ramsgate	Priory Infant School	School	1.75	525	Anthony Goulden	RR-0147
Ramsgate Centre	Christ Church	Place of Worship	1.76	528	Sarah Bowman	RR-1772
Ramsgate Centre	Vale Square and Gardens	Residential	1.76	528	Donald Ross Campbell	RR-0475
SW Ramsgate	St Augustine's Shrine	Heritage	1.76	528	Ramsgate Heritage & Design	RR-1626

	and Abbey (Pugin)				Forum	
SW Ramsgate	St Augustine's Roman Catholic Church	Place of Worship	1.76	528		
SW Ramsgate	Divine Retreat Centre	Place of Worship	1.76	528		
Ramsgate Centre	Elms Nursery School	School	1.77	531	Rebecca Dance	RR-1643
Westcliff	Churchill House School of English Language	School	1.84	552	Jeni Butler	RR-0782
Ramsgate Centre	Chatham and Clarendon Grammar School	School	1.89	567	John Murdoch	RR-0870
Westcliff	Spencer Square Public Tennis Courts	Recreational	1.91	573	Gemma Anne Dempsey	RR-0586
Westcliff	The Old Priory School	School	1.91	573	John Flood	RR-0846
Ramsgate Centre	St George's Church	Place of Worship	1.94	582	Samara Jones-Hall	RR-1754
Ramsgate Centre	Liverpool Lawn Gardens	Recreational	1.98	594	Jane Hetherington	RR-0740
Ramsgate Centre	Hardres St United Church	Place of Worship	2	600	Samara Jones-Hall	RR-1754
SW Ramsgate	Chatham and Clarendon 6th Form Centre	School	2	600	Mrs Christine Prior	RR-1320
Marina	Sailor's Church	Place of Worship	2.01	603	Mr Paul Gall-Johnson	RR-1279
Marina	The Arches (Restaurants and Bars)	Restaurants/Cafes	2.01	603	Naomi Grady (Owner of Archive)	RR-1400
Westcliff	West Cliff Arcade (Restaurants)	Restaurants/Cafes	2.01	603	Mr Gary Ottewill	RR-1252
Marina	Royal Harbour and Marina	Tourism	2.03	609	Patricia Cunningham	RR-1480
Eastcliff	Albion Place Gardens	Recreational	2.17	651	Friends of Albion Place Gardens	RR-0566

Eastcliff	La Belle Alliance Square	Recreational	2.18	654	Evelyn Matthews	RR-0543
Eastcliff	Albion House Hotel	Tourism	2.18	654	Albion House Hotel	RR-0034
Royal Harbour	Royal Harbour (Restaurants and Bars)	Restaurants/Cafes	2.2	660	Jacqueline Ansell	RR-0712
Eastcliff	Mother Goose Nursery	School	2.22	666	Mums Against Manston	RR-1392
Royal Harbour	Royal Victoria Pavillion (Beachside Terrace)	Restaurants/Cafes	2.24	672	Alison Jones	RR-0055
Eastcliff	Arklow Square	Recreational	2.25	675	Lesley Miller	RR-1023
Eastcliff	Holy Trinity Church	Place of Worship	2.25	675	Samara Jones-Hall	RR-1754
Eastcliff	Eastcliff Promenade/Bandstand	Recreational	2.27	681		
Eastcliff	Eastcliff Promenade/Pleasurama	Development Opportunity	2.27	681	Philip Davies	RR-1584
Royal Harbour	Ramsgate Main Sands	Recreational	2.28	684	Ramsgate Coastal Community Team	RR-1625
Eastcliff	4 Winds Residential Care Home	Residential	2.37	711	Anthony Shephard	RR-0153
Nearest Railway Stations						
Minster	Minster Station	Transport	3.2		Eversheds Sutherland on behalf of Network Rail	RR-0544
St Lawrence	Ramsgate Station	Transport	2.6		Eversheds Sutherland on behalf of Network Rail	RR-0544