Dated: 7 MARCH 2019

FOREWORD

- In an effort to aid the ExA we are submitting comments with evidence in the form of a row under each of the answers provided by the Applicant on a section by section basis
- Our comments have been highlighted in yellow for ease of identification
- We respectfully request the questions in red below the comments are considered by the ExA and/or asked of Applicant as appropriate
- As a general comment, we would like to take this opportunity to point out that the Applicant does not appear to
 have provided any independent evidence to support any of the statements it has made throughout its responses
 in the SOCIO-ECONOMIC section, unless such underlying third party documents have been specifically referred
 to by the ExA in its original questions, (e.g. Aviation National Policy Statements, ("NPS"). Any and all footnotes in
 this document are therefore provided by Five10Twelve Ltd as independent evidence to support our comments
- Comment or question (or lack of) does not mean agreement with or support for Applicant.

FIVE10TWELVE LTD STATEMENT REGARDING CONFLICT OF INTEREST AND IMPARTIALITY

For the avoidance of any doubt and in the interests of full transparency, we hereby confirm that neither Five10Twelve Ltd or its subsidiary, Love Ramsgate Ltd, or any of our Directors have any interests, either financial or otherwise, in the Manston site or any other rival development beyond those of a local business and local residents with strong concerns regarding the devastating impacts of the proposed development on the local area, economy, environment and population.

Neither Five10Twelve Ltd, or Love Ramsgate Ltd, or any of our directors have accepted any payments or any other form of compensation or inducements for presenting this or any of our other submissions or representations to the ExA. Any offers or suggestions of such from any party will be refused and immediately reported to the ExA.

Ref No.	Respondent	Question	
SE.1 Socio-e	SE.1 Socio-economic effects		
SE.1.1	The Applicant	Tourism Has any assessment of potential economic effect caused by outbound tourism from local residents going abroad	
		Applicant's Response: No likely significant economic effect is anticipated as a result of outbound tourism from local residents and hence a quantified assessment of the expected number of local residents that may transfer from local activities to outbound tourism	
		has not been undertaken in the ES [APP-034]. Effects from outbound tourism were not included in the scoping report and no comment was made by Thanet District Council requesting such an assessment at the time. Nonetheless, for completeness the reasons why outbound tourism is not likely to result in significant adverse effects are summarised below:	
		Whilst the proposed routes are yet to be determined, the question assumes that a choice between a holiday in Ramsgate and/or Margate and a holiday in an outbound destination is created by the Proposed Development which cannot be met via existing connections. The proportion of residents/visitors that had no holiday abroad before the re-opening of the airport and who now decide to go abroad solely because of the existence of an airport nearby is likely to be very small.	
		 There are a wide range of national and international destinations accessible to residents in Thanet via existing airports. Irrespective of the ultimate destinations served by the proposed development, these will not match the range and frequency of destinations served by Gatwick (1.5-hour drive time from Margate), Heathrow (circa 2 hours) and to a lesser extent London City Airport (circa 2 hours). Ebbsfleet international is around a 1-hour drive time, providing access to mainland Europe via the channel tunnel, whilst cross channel ferry access via Dover is circa 40 minutes. 	

For any economic effect caused by an increase in outboard tourism from local residents, the relevant receptor would be local businesses and hence local employees and employers. The ES [APP-034] concludes that there would be a positive effect arising from both increased outbound (i.e. domestic) and inbound (i.e. international) visitors; this increase would benefit the same group of people. Moreover, if an increase in outbound tourism from local residents were to occur - however small - it is reasonable to assume at least some positive socio-economic effects associated with ticket purchases and associated spending in advance of such a flight would accrue to the local and regional economy. This would further offset any adverse effect.

COMMENTS

- The Applicant's response appears to be predicated on circular logic which, to paraphrase, suggests the Applicant, without any reasonable assessment, has predetermined that "no economic effect is anticipated as a result of outbound tourism", therefore any such assessment has been deemed by the Applicant as an unnecessary undertaking.
- In the absence of any such considered assessment, the subsequent responses provided by the applicant to question SE.1.1 can therefore only be taken as speculative assumptions for the purposes of providing an off-the-cuff response to the ExA's questions.
 - The Applicant confirms this is purely in the interests of "completeness". This suggests a 2.1. 'tick-box' approach to responding to the ExA's question.
 - 2.2. This will come as little comfort to Thanet's 7,950 employees whose tourism-related jobs are at stake¹, or indeed to the wider Thanet economy, which depends on the industry for £319 million of value² it brings to the region.
 - The casual nature of the Applicant's response also does not allow for any **optimism bias** 2.3.

¹ Appendix SE: 001 - Visit Thanet Business, Cambridge Model Economic Survey, 2017

² ibid

- on behalf of the Applicant and by the very nature of a speculative assumption precludes any detailed analysis or basis in fact.
- 2.4. Since there is absolutely no attempt at a scientific or evidence-based approach presented by the applicant, we can only comment on the underlying logic and reasoning of the Applicant, (or lack thereof), and in the assumptions it presents.
- 3. The Applicant states that "the question assumes that a choice between a holiday in Ramsgate and/or Margate and a holiday in an outbound destination is created by the Proposed Development which cannot be met via existing connections", concluding that since demand can evidently be serviced by such existing connections, the impact "is likely to be very small".
 - 3.1. The Applicant appears to be openly suggesting that all but a "very small" amount of current demand for passenger air travel in the region can be adequately serviced by "existing connections".
 - 3.2. Having thus undermined its own business case for passenger flights, the Applicant then underlines it, helpfully pointing out the wide range of options currently available to those in the area that the proposed development "will not match".
 - 3.3. Whilst we are inclined to agree with the Applicant that the competitive landscape and location of the proposed development will make it difficult to generate anything but a "very small" amount of passenger traffic, the Applicant does not appear to have followed this logic through when considering how detrimental the scenario it presents might be to airlines and charter operators for whom load factors and viability will be prime considerations.
 - 3.3.1. It is unclear, for example, whether the Applicant's own lack of confidence in its

ability to compete for passenger services have formed part of the discussions that "have taken place between the Applicant and KLM" as recently as February 20193, or with any other potential passenger airlines or charter flight operators.

- 3.3.2. Regardless, KLM will no doubt already be aware of the difficulties in selling passenger services in this competitive and crowded market and with low market demand at Manston, given its previous experience operating at Manston with "seventy-eight seat Fokker planes" that were flying at just "42 per cent of capacity" 4
- Consequently, it is no surprise at all that the Applicant has **not provided any** 3.3.3. evidence to support its claim in response to question ND.1.36 that "KLM has indicated an interest in reinstating a double daily service from Manston to Schipol", or any evidence to support other claims and forecasts in the Azimuth Report regarding charter operators and Low Cost Carriers ("LCCs"), including that "Ryanair have given RiverOak an indication that they will base two aircraft at Manston in the first three years of operation" 5
- It is indeed fortuitous that Dr Sally Dixon, author of the Azimuth Report, is able to 3.3.4. shed some light on this complex issue with a methodology that is perhaps best described as "bespoke".
- 3.3.5. This bespoke approach is based on the rather counter-intuitive belief that "historic data is not a good indicator of future performance" 6, thus freeing the researcher from the tiresome necessity of having to include in their considerations

³ (REP3-195) RSP DL3 Submission - Response to ExA Written Questions ND.1.36

⁴ Appendix SE: 002 - Manston Airport - Under private ownership (page 5), Kent County Council position statement, March 2015

⁵ (APP-085) Azimuth Report, Vol.IV, Page 47, paragraph 4.4.1.0

⁶ (RR-0496) Relevant Representation submitted in a personal capacity by Dr Sally Dixon in support of the Applicant

the history of previous failed passenger airline services, scheduled and charter, which operated from the former Manston Airport, as - presumably - these can only serve to corrupt the data. These include:

- EUjet based at Manston, went into administration in 2005, stranding 5,400 passengers, and eventually taking parent company, Planestation PLC, (Vice President: Tony Freudmann), down with it, prompting an enquiry in the House of Commons ⁷
- Monarch Airlines/Cosmos charter between Manston and Norfolk, Virginia (2006) - cancelled prior to commencement due to lack of bookings
- Seguro Travel/Futura International Airways launched 2007, ceased
 trading 2008 9
- FlyBe services commenced 2010 and all services pulled 2012, with FlyBe spokesman Niall Duffy, stating "we tried different routes and the numbers simply weren't there. It's impossible to sustain routes without the passengers" 10
- Atlantic Holidays/Monarch Airlines charter flights during summer 2011,
 discontinued same year ¹¹

⁷ Appendix SE: 003 - CAA briefing for the House of Commons on EUjet Ops Ltd, 4 February 2006

⁸ Appendix SE: 004 - Manston Airport, 'Expansion', Wikipedia

⁹ Appendix SE: 005 - Futura's problems blamed for UK tour firm's collapse, Majorca Daily Bulletin

¹⁰ Appendix SE: 006 - FlyBe to stop using Manston Airport, BBC News, 22 December 2011

¹¹ Appendix SE: 004 - Manston Airport, 'Expansion', Wikipedia

- Newmarket Holidays/Small Planet Airlines charter flights during 2013 season, discontinued same year ¹²
- KLM commenced April 2013¹³, **78 seater flights** operated at **42**% capacity, ended April 2014¹⁴ shortly before closure of airport.
- 3.4. On KLM, the Azimuth Report notes that "the company was forced to pull out of the airport before the lucrative summer season. As such, it is difficult to estimate what passenger numbers would have been if KLM had been able to continue operating from Manston". 15
 - 3.4.1. It is not clear from the research available as to whether KLM operated any summer flights during the 12 month/4 season period from April 2013 April 2014, (if not, why not?), or whether such **historical data** was merely discounted by Dr Dixon, as per her established methodology.
- 3.5. With Dr Dixon's 'clean slate' approach to forecasting and whilst refuting any accusations of "optimism bias" ¹⁶ the Azimuth Report includes forecasts that must surely be more accurate than the Applicant's more guarded and pessimistic response to SE.1.1 seems to indicate, as follows:
 - 3.5.1. Azimuth forecasts assume a remarkable **662,768 passengers carried** *in the very first year of passenger flights*, (Y3 of operation) ¹⁷. To put this into context, this is

¹² Appendix SE: 004 - Manston Airport, 'Expansion', Wikipedia

¹³ Appendix SE: 007 - KLM to launch flights from Manston, Global Travel Management, 6 February 2013

¹⁴ Appendix SE 008 - Manston Airport - KLM airline 'will not return', BBC News, 8 April 2014

¹⁵ (APP-085) Azimuth Report, Vol. II, page 47, paragraph 4.47

¹⁶ (REP3-223) Five10Twelve submission to Deadline 3, Written Representation, Pages 10-11, paragraphs 5.14 - 6.4

¹⁷ (APP-085) Azimuth Report, Vol. III, Page I, Table 1

more than 13 times greater than the highest number of passengers ever achieved ¹⁸ from Manston during any of its final 9 years of operation between 2005-2014.

- 3.5.2. Since Dr Dixon's bespoke methodology tells us that "only inexperienced or foolhardy practitioners would attempt a straight-line regression" ¹⁹ when forecasting based on the now discredited historical data and past-performance method, the evidence of previous pulled services, dissolved businesses and under-performing operators can be completely ignored in favour of Azimuth's straight-line growth in forecast passenger numbers from immediate market entry with 662,768 passengers at launch in year three to 1,407,753 passengers in year 20.
 - 3.5.2.1. We are obliged to point out purely as a mathematical point of fact, which should not in any way be taken as a comment on Azimuth or Dr Dixon's methods that this represents a **2,715% increase** over the highest number of passengers ever achieved in any year from 2005-2014 during previous Manston operations.
- 4. The final paragraph of the Applicant's response bases its conclusion on assumptions that are presented here in a perfunctory manner and without any indication of what these assumptions are based on other than its own ES (APP-034).
 - 4.1. We can only assume that the applicant did not deign to specify where in the ES a 387 page document one might find the basis of these bizarre conclusions since the justifications contained therein are so ludicrous and unsubstantiated within themselves as

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¹⁸ Appendix SE: 002 - Manston Airport - Under private ownership (page 3), Kent County Council position statement, March 2015

¹⁹ (**RR-0496**) Relevant Representation submitted in a personal capacity by Dr Sally Dixon in support of the Applicant

that the Applicant may have felt it more prudent to hide or bury them.

- 4.2. In the absence of any clear indication or more helpful referencing, we assume that the bulk of the Applicant's assumptions are drawn from pages 255 257, paras 13.8.77 13.8.85.
- 4.3. It is important to note in the first instance that the ES appears to have based its tourism data on the Thanet Visitor Survey 2010 & Visit Kent DMP Research 2012²⁰
 - 4.3.1. This data is at least 5 years out of date, based on data samples taken when the former Manston Airport was still operational and therefore visitor numbers were significantly lower than they have risen to since closure. There have been two more recent and more accurate statistical releases since then, in 2015²¹ and 2017²².
- 4.4. We further note that the ES assumes at paragraph 13.8.78 that of the 1,407,753 passengers forecast to travel via the airport in year 20, **100% of them** will, according to the ES, be overnight tourist visitors in Thanet. This is misleading in several key ways:
 - 4.4.1.1. This assumes that **100% of passengers** will be inbound, by which we assume that outbound flights will all be empty. This is surely not a viable business model for an airline and is most certainly not sustainable.
 - 4.4.1.2. This also assumes that **100% of passengers** will be staying overnight in visitor accommodation presumably even if they are local residents returning home.

²⁰ (**APP-034**) Environmental Statement, Main Text, Page 235, 13.4.42, footnote 50 (with footnote listed somewhat unhelpfully on page 263)

²¹ https://www.visitkentbusiness.co.uk/library/Economic_Impact_of_Tourism_-_Thanet_2015_FINAL_REPORT.PDF

²² Appendix SE: 009 - Destination Research - Economic Impact of Tourism - Thanet 2017

- 4.4.1.3. It further assumes that **100% of passengers will be staying overnight in Thanet**, as opposed to perhaps using Manston as an entry point to the UK before transferring to London or elsewhere. It is not clear how this helps to "ease congestion at Heathrow", which we believe is another of the central tenets of the Applicants' NSIP case.
- 4.5. The ES states at 13.8.79 that "increased incomes from employees at Manston will likely lead to increased demand for tourism facilities and associated spending in the locality".
 - 4.5.1. This statement, prefaced with the idea that employees at Manston will have "increased incomes", (increase from what? How has Applicant evidenced this increase?), and already caveated ("will likely lead"), is then summarised thus, (our emphasis in bold):

"This could result in improvements to their volume of trade"

- 4.6. We respectfully suggest to the author or authors of the ES that the only way that paragraph 13.8.79 could have been made any less meaningful and devoid of all substance would be to add the words "I guess?" at the end of the paragraph. This is, however, clearly implied, and therefore redundant.
- 4.7. It is unclear why **old and out-of-date data was used for the basis of the Applicant's calculations**, perhaps other than to present a less favourable picture of Thanet's visitor economy than is actually the case.
- 4.8. Given the use of old data, twice superceded, and lack of any coherent, credible or

evidence-based argument in the ES to support the Applicant's assertions, we totally reject and refute the conclusions drawn by the Applicant in its response to question SE1.1. that "there would be a positive effect arising from both increased outbound (i.e. domestic) and inbound (i.e. international) visitors", or that there would be any "benefit" at all. This has simply not been shown.

- 4.9. We also refute the suggestion that it is in any way "reasonable to assume at least some positive socio-economic effects associated with ticket purchases and associated spending in advance of such a flight would accrue the local and regional economy", not least because in the unlikely event that KLM, Ryanair or any similar aspirational target carrier ever follows Dr Dixon's methodology and ignores the long history of failed carriers and poor demand at the site, such ticket sales would surely be processed online with precisely zero benefit for the local and regional economy.
 - 4.9.1. We note, however, the use of the phrase "..at least some positive socio-economic effects" and consider those straws duly clutched.
- 5. It is worth noting the comments and observations presented by Local Councillor, Sam Bambridge, (REP1-029), who (partially) correctly states that "in the past tourism was a vital part of the local economy here. Over the last three decades tourism has declined, as it has for many UK coastal towns".
 - 5.1. Ironically, despite pointing out that with an airline based at Manston "the likelihood is that 80% of passengers will be outbound and 20% inbound", Cllr Bambridge then completely misdiagnoses the issue, and sees the airport as the solution rather than the problem.
 - 5.2. It is, of course, well-documented that the reverse is true, as noted in the House of Commons ODPM: Housing, Planning, Local Government and the Regions Committee on

Coastal Towns:

"the traditional industries which sustained these towns, namely tourism and marine related industries, have seen declines due to the changing nature of holidays, with a direct correlation between the increase in cheap package holiday flights abroad and the decline in "at home" holidays" 23; and

"cheap airfares and "guaranteed sunshine" became more popular. In 1968, 75% of all holidays were taken in the United Kingdom. By 1999, the numbers had declined to 44% and the number of seaside visits had dropped to 22 million from 32 million between 1980 and 2005" ²⁴.

- 6. Conversely, sharp rises across every metric since the closure of Manston Airport in 2014 have seen visitor numbers to Thanet rise by 36% since the former airport was operational, from 3.1m in 2010 to 4.22m in 2017, driven largely by domestic tourism. ²⁵
 - 6.1. Given the above, combined with the significant negative impacts of the airport operations on the local area and its tourism, particularly Ramsgate, caused by flights over the town at altitudes of 400ft-600ft, it follows that the closure of the former airport had a positive impact on 36% tourism growth in Thanet.
 - 6.2. In the absence of any tourism impact assessment by the Applicant, it is not unreasonable to assume that at least 36% economic loss to the industry would also follow in the event that the Applicant's DCO proposal is granted due to outbound tourism from locals going abroad. This would inevitably also result in a significant loss of jobs in the industry relative to this sharp decline.

²³ Appendix SE: 010 - House of Commons Housing, Planning, Local Govt. and the Regions Committee, Coastal Towns, (Session 2005-06) p.147

²⁴ Appendix SE: 011 - House of Commons Housing, Planning, Local Govt. and the Regions Committee, Coastal Towns, (Session 2005-06) p.25

²⁵ Appendix SE: 009 - Destination Research - Economic Impact of Tourism - Thanet 2017

7. Summary

Notwithstanding the Applicant's reluctance to put any energy into answering this crucial question for the local economy, there clearly appears to be a disconnect between the rather more downbeat assumptions presented by the Applicant in its answer to question SE 1.1 and the assumptions presented in the Azimuth Report that 2,715% growth is in any way a realistic forecast.

- 7.1. This presents a challenge when commenting on the Applicant's answers and assumptions to question SE.1.1, i.e.:
 - a) should the ExA assume that the Applicant's answer to SE.1.1 is correct and that the demand for passenger flights from Manston will be so "very small" as to have a negligible impact on outbound tourism and the exponential growth of the local visitor economy since the closure of Manston Airport? or
 - b) should the ExA consider the evidence presented in the Azimuth report regardless of what one might think of the underlying methodology or assumptions as a basis for assessing the impact of outbound tourism on the local economy?
- 7.2. Option (a) is essentially the "no change" option. Adopting this approach, as the Applicant has done in its response to question SE.1.1, is incorrect since it is reasonable to assume an alleged Nationally Significant Infrastructure Project will create significant change. This must surely be inherent in the proposed designation?
- 7.3. Further, since the Applicant's entire 'need' case, business case, socio-economic impacts, (including but not limited to jobs creation), and environmental impacts are based on the forecasts produced in the Azimuth Report, it is not unreasonable to

suggest that the Applicant should consistently apply such forecasts in all applicable areas - even where it may not be to their obvious benefit.

- 8. In our view, it is both unreasonable and irresponsible of the Applicant to attempt to claim all of the alleged positive socio-economic benefits of the proposed development without also acknowledging, assessing or mitigating against any potential harm that it may cause.
- 9. Given the overwhelming importance of tourism and, domestic tourism in particular to the local economy and the likelihood of at least 34% loss in tourism revenues and jobs resulting from the development, we do not consider the Applicant's casual and ill-considered response to question SE.1.1, or lack of impetus to even consider an outbound tourism impact assessment, to be in any way reasonable, responsible or respectful. In fact, the Applicant's response borders on contempt.

QUESTIONS

In light of comments at paragraphs 1-9, above, we respectfully suggest that the ExA might consider its response and/or ask the Applicant to provide supplementary information and/or provide answers to additional questions, as follows:

- 1) Given the importance of the **7,950 jobs** and **£319 million** that tourism brings to local economy, to what extent does the ExA feel the Applicant has provided a reasonable, responsible and respectful answer to its question SE1.1?
- 2) Does the Applicant consider there is any disparity between the assumptions regarding its proposed passenger services presented in answer to question SE1.1 and its forecasts in the Azimuth Report? Which is the more likely scenario?

- 3) Can the Applicant provide any evidence regarding its progress with KLM and/or Ryanair or others?
- 4) How does the Applicant propose to achieve 2,715% growth in passenger numbers from those most recently recorded at the former Manston Airport to those expected in Y20?
- 5) What was the rationale behind using 2010/2012 DMP data for the Applicant's visitor statistics and calculations in the ES?
- 6) Can the Applicant comment on the methodology and reasoning of assuming 100% of all passengers carried will be inbound? Does the Applicant have a particular business model in mind that might help airlines offset the fuel and personnel costs involved in flying empty planes for return legs?
- 7) Can the Applicant provide any salary estimates, broken down by employee types/numbers, and/or any other data or underlying assumptions that have been used to calculate "increased incomes" and estimated disposable income from employees at Manston?
- 8) Can the Applicant provide any credible examples of how monies for "ticket purchases" might accrue for the local economy and/or what other "associated spending in advance of such a flight" might otherwise benefit the local economy?
- 9) What impact does the Applicant consider cheap airfares and charter flights may have had on UK coastal towns and what contribution has this made towards the years of deprivation and neglect that Thanet now shows positive signs of emerging from?
- 10) Since the Applicant has chosen to pass on the opportunity to properly consider or assess the impact of outbound tourism on the area, can we assume that the ExA confer presumption of fact

on the assessment and thesis put forwards and evidenced in our comments herein with regards
to the devastating effect on the local visitor economy?

Ref No.	Respondent	Question
SE.1.2	The Applicant	Various relevant representations (including RR-0890, RR-0224, RR-1342, RR-0171, RR-0439, RR-0874, RR-0949) raise concern over the potential adverse effect of flights over Ramsgate on the growing tourist trade.
		What is your view on this?

Applicant's Response:

Socio-economic impact upon tourism as a result of the Proposed Development is considered within Chapter 13 of the ES [APP-034], paragraphs 13.8.68 - 13.8.85, which examine effects in Thanet and Kent at construction and operational stages, respectively. Once the additional visitors associated with the proposed development are taken into account, the overall effect is expected to be positive. This conclusion draws upon technical assessments in Chapter 12: Noise and Vibration and Chapter 14: Traffic and Transport of the ES [APP-034]. The assessment of the expected freight, passenger and job numbers is drawn from analysis in the Azimuth Report (Volume III and IV) [APP-085]. Specifically, regarding the potential adverse effects of flights over Ramsgate on the growing tourist trade, the socio-economic assessment concludes that whilst there may be an increase in the absolute noise level in Ramsgate, the effects of reopening the airport on tourism will be positive. This is explained further below.

Potential adverse economic effects resulting from the reopening of the airport are centred on two aspects.

• First, potential disruption to the local road network impacting upon employee and customer access to local attractions. There will be a higher number of HGVs and cars on the road network (Chapter 14: Traffic and Transport of the ES [APP-034]), with greatest increases on the A299 and Spitfire Way. Direct access to key tourist attractions is not anticipated to be significantly affected as these routes do not act as through roads and alternative routes are available. Mitigation measures are planned to manage movements and the overall economic effect upon tourist attractions arising from additional traffic will be either negligible or not significant (see Table 14.26) in Chapter 14: Traffic and Transport of the ES [APP-034].

Ref No.	Respondent	Question
		 Second, in terms of indirect impacts upon amenity, such as increased traffic, noise or dust, detailed assessments have been undertaken in Chapter 6: Air Quality, chapter 12: Noise and Vibration and Chapter 14: Traffic and Transport of the ES [APP-034]. Based upon these assessments – and with appropriate mitigation measures – significant adverse effects are not expected on local residents. Whilst tranquil conditions of the area may be affected by aircraft noise, it is anticipated that the Proposed Development will attract more people to or through the area, so the number of people using associated local tourist amenities will rise, with an anticipated effect of minor (see paragraph 13.98.81) to moderate (see paragraph 13.8.85) beneficial significance.
		• Chapter 13 of the ES [APP-034] considers the number of additional passengers expected. In Year 5 this is estimated at just under 690,000 additional passengers, in year 10 just under 1 million and year 20 just over 1.4 million passengers. This is compared to recent (2012) data on visitor numbers to Thanet, which indicates some 3.1 million annual visitors to Thanet, of which some 775,000 (25%) are overnight visitors (paragraph 13.8.77). If the proportion of new visitors staying overnight reflect existing patterns, the increase in staying visitors could be c.45% by year 20 (paragraph 13.8.75). This illustrates that the overall quantum of visitors expected would represent a sizeable increase over recent visitor numbers. Challenges in drawing specific conclusions on the balance of influences, including external factors unrelated to the proposed development are also noted (See paragraphs 13.8.78 to 13.8.81). This is discussed further in the response to question SE 1.15.
		Specifically, the ES notes (Paragraph 13.8.84) "levels of noise increase are small in comparison to existing levels at the most exposed locations which include the centre of Ramsgate, the port and the main beach".
		 Furthermore, details of the noise mitigation plan are contained in Chapter 12 of the ES: Noise and Vibration (see paragraph 12.5.4 to 12.5.19). The proposals include:
		 a) Restrictions on night-time aircraft b) Annual quota counts for night time aircraft movements c) Restrictions on training flights d) The establishment of a community consultative committee and trust fund e) Noise monitoring systems

Ref No.	Respondent	Question
		f) Departure noise limits and "track" (i.e. route) monitoring
		g) Runway preference measures to reduce overflights of Ramsgate
		h) Procedures for arriving aircraft to minimise noise
		i) Restrictions on engine testing
		Further measures associated with the aircraft dwelling relocation scheme; the aircraft noise dwelling insulation scheme; the insulation scheme for noise sensitive buildings; as well as the control of industrial and commercial sound alongside masterplan design measures to mitigate or manage noise are set out in paragraphs 12.5.9 to 12.5.19 of Chapter 12 of the ES: Noise and Vibration [APP-034].
		COMMENTS
		1. We will draw our own conclusions from the fact that in much of its response, the Applicant appears to be going to
		extraordinary lengths to avoid answering the question.
		1.1. Our reading of question SE.1.2 is the issue at hand has nothing to do with traffic or HGV movements,
		highly questionable modelling of visitor and/or job numbers or disposable income of Manston employees,
		(assuming the applicant raises enough funds to pay them). The question is solely concerned with the adverse effects of flights over Ramsgate.
		2. Transparent attempts to avoid or delay answering the question notwithstanding, please refer to our comments on
		Applicant's responses to question SE.1.1 with regards to:
		2.1. The Applicant's use of outdated, twice-superceded, misleading and inaccurate visitor data as a baseline
		2.2. The Applicant's conflicting assessment of the number and impact of passenger flights presented in its
		answer to question SE1.1 and in the Azimuth Report
		2.3. The optimism bias of the Azimuth Report and projected 2,715% growth in passenger numbers from the

		highest number achieved during the most recent passenger operations at Manston
	<mark>2.4</mark> .	The history of failed passenger services at Manston - including but not limited to comments publicly made by FlyBe upon withdrawal of services, the absence of a single positive case study of successful
		passenger air services from Manston and the wilful avoidance of Dr Sally Dixon, author of the
		Azimuth Report to consider historical data.
		Azimutii Report to consider historical data.
	<mark>2.5.</mark>	The misleading modelling of passenger numbers and overnight visitor forecasts in Thanet based on
		100% inbound passengers, 100% overnights exclusively in Thanet
	<mark>2.6.</mark>	Points 2-1 - 2.5, above, coupled with the lack of evidence-based - or any otherwise credible -
		assumptions underlying the Applicant's ill-formed conclusions in the ES (APP-034) that the "number of
		people using associated tourist amenities will rise, with an anticipated effect of minor to moderate beneficial
		significance".
		We are confident that we have shown the Applicant's risible statement, above, is not in any way
		supported by any evidence, reason or logic. We totally reject it in the strongest possible terms.
	3. As reg	pards noise effects and mitigation, we reserve the right to comment separately and in appropriate
	section	ns, or at a later deadline regarding the Applicant's noise modelling and noise mitigation, which we strongly
	<mark>reject</mark>	on the following grounds:
	3.1.	Applicants' consequents as assessment of the second state and second sec
	3.1.	Applicants' approach to noise modelling has been called into serious question since the start of this process, with significant issues and concerns raised at every level, including but not limited to:
		process, with significant issues and concerns raised at every level, including but not limited to.
		3.1.1. Baseline measurements and how/where/when these were captured; noise contours; aspirational
		flight swathe; unknown flight paths; aspirational runway preference, (neither of which can be relied
		upon in any sense due to the Applicant's failure to progress its CAA applications in a timely
		manner); historical work summarised by Bickerdike Allen re noise footprint; absolute noise
		values-vs-equalised/average values; historical data of noise measurements taken from previous
		flight data over Ramsgate when airport previously operational, lack of acknowledgement of
		significant issues with regards to open spaces, schools, conservation area, HAZ etc
		3.1.2. Concerns raised re noise modelling by Interested Parties and Local Authorities, including but not
I.		

limited to Canterbury City Council LIR (REP3-246), Thanet District Council LIR, (REP3-010)

- 3.2. Noise mitigation plan is **totally inaccurate and inappropriate**, **both in its design and its costing**. This will addressed separately.
- 4. We totally reject the Applicant's unfounded and unevidenced assertion that "levels of noise increase are small in comparison to existing levels at the most exposed locations which include the centre of Ramsgate, the port and the main beach".
 - 4.1. We have submitted separately a series of four videos to DL4 of flights over Ramsgate, each taken during the previous operational period of Manston Airport. Obviously, we do not as yet have correct Examination Library reference numbers for these files, so we have taken the liberty of attaching a few screen shots with the relevant video file names below:

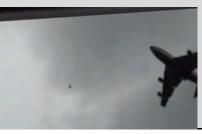
Flight Southwood.mov

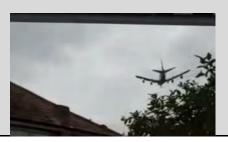






Flight_Southwood2.mov







Flight Royal Harbour 2.mov







Flight Ramsgate Harbour.mov







- 4.2. We urge the ExA to watch each of these videos in full as they are perhaps the clearest, best and most accurate way of getting a sense of why the residents of Ramsgate are so fiercely opposed to the proposed development.
- 4.3. The reality is that, as a widely accepted rule of thumb, commercial aircraft ascend/descend at approximately 300ft per Nautical Mile, (NM) and the nearest residential properties on the edge of town closest the runway are approximately 0.7NM from the end of the runway. The houses pictured in the Southwood area are approximately 1.33NM from the end of the runway, (so altitude will be c. 399ft). The Royal Harbour with its harbour side terraces, cafes, bars, quiet beaches, promenade, cycle path etc is c.2.1NM from the end of the runway, (c.630ft altitude). This is simple, unavoidable maths.
- 4.4. The Applicant has gone out of its way to avoid talking about Ramsgate or dealing with this fundamental

issue at every turn. This includes the ludicrous 1km "study area" which sought to exclude Ramsgate from Historic England's assessment of the impact on the town - with the largest conservation area in Kent, more than 450 listed buildings and one of only a handful of Heritage Actions Zones (HAZ) in the UK. This also includes the Applicant's approach to this question SE.1.2, which follows an already very well established pattern to misrepresent, obfuscate or avoid entirely.

- 4.5. Against this evidence, we challenge **anyone** to believe that "levels of noise increase are small in comparison at the most exposed locations which include the centre of Ramsgate, the main port and the main beach". This is simply false.
- 4.6. We also believe the Applicant knows full well that there are multiple issues with the **proximity of Ramsgate** and the orientation of the runway in relation to the town, (how the Applicant not know this?), that virtually guarantees the Applicant will have little other choice but to have aircraft fly directly over the town at altitudes of 300ft 650ft.
 - 4.6.1. Further, it is our opinion that flight swathes, noise contours and study areas have been cynically engineered to constrain any assessment or inclusion of these issues by statutory bodies and third parties in order to ensure Ramsgate is kept "out of scope" during the DCO process in any area where these concerns might ordinarily lead to significant challenges and/or high levels of mitigation costs that would render the project not feasible.
 - 4.6.2. This includes, but is not limited to, limitation of the environmental study area and manipulation of noise contours to ensure very small number of properties and entirety of conservation and HAZ are left out of the 60db contour, use of outdated reports, (e.g. 2010/2012 visitor stats), ignoring historical data including noise monitoring data from previous airport operations etc.
 - 4.6.3. We would like to draw the ExA's attention to our Written Representation to DL3²⁶, specifically paragraphs 5 6 regarding Applicant's management of stakeholder opinion. In particular, excerpts from Dr Sally Dlxon's PhD thesis at paragraph 5.12 vis-a-vis Luke's 'three dimensions of power':

"power is exerted to prevent open decision-making or encourage non-decision-making, and mechanisms are invoked to keep decisions from being discussed";²⁷ and

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²⁶ (**REP3-223**) Five10Twelve Ltd, Written Representation

²⁷ *ibid*, paragraph 5.12

"it may also be that certain issues do not become verbalised arguments because the **political agenda surrounding airport development has been constrained** by those with the power to do

so²⁸

4.7. Quite apart from the noise issues, the question of **setting** and **significance** does not appear to have been taking into consideration at all. Issues which affect setting of a heritage asset also have an impact on its significance. This includes, for example:

"Development further afield may also affect significance, particularly where it is large scale, prominent or intrusive" ²⁹

4.8. In this instance, 'large scale' must certainly include a development under examination as a Nationally Significant Infrastructure Project and 'intrusive' may reasonable include low-flying aircraft as a direct result of "implications of development affecting the setting of heritage assets" 30

QUESTIONS

In light of comments at paragraphs 1-4, above, we respectfully suggest that the ExA might consider its response and/or ask the Applicant to provide supplementary information and/or provide answers to additional questions, as follows:

1) Given issues raised by individuals, groups, statutory bodies and LA's, including Canterbury City Council LIR, (REP3-246) and Thanet District Council LIR, (REP3-010), Applicant should be required to revise noise modelling and noise contours, taking into account all comments received and historical data from previous airport operations and from a 'worst case scenario' standpoint.

²⁸ (**REP3-223**) Five10Twelve Ltd, Written Representation, pg. 5.12

²⁹ Appendix SE: 012 - The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3, Historic England, pg.5

³⁰ Appendix SE: 012 - The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3, Historic England, pg.8

		2) We urge the ExA to watch the video files referenced about, ideally prior to the forthcoming ASI, in order to be better acquainted with as close to the actual lived experience as possible during the visit.
		3) To what extent has the Applicant considered the setting of heritage assets and the issues detailed in the Historic England Setting of Heritage Assets advice document? Can the Applicant comment on how this might be applicable to any part of the Ramsgate conservation area, the HAZ and/or the only Royal Harbour in the UK?
		4) To what extent does the Applicant consider its proposed development is 'large scale'?
		5) To what extent does the Applicant consider its proposed development is 'intrusive' as a result of the implications of its proposed development?
SE.1.3	The Applicant	Employment generation and scope for employment
		[RR-1754] considers that mechanisation of freight would reduce the potential impact of jobs created by the airport.
		What is your view on this?

Applicant's Response:

Taking the three principle types of air freight - bellyhold, express and freighter - mechanisation in the handling process at airports is most advanced in the small package driven express freight sector where bar code and electronic tag technology allow automated processes. It has also found its way into major cargo centres built around bellyhold freight such as Heathrow, but because the freight being carried is more varied in nature (e.g. specialist handling like refrigeration and larger bespoke items) it cannot be as heavily mechanised. Freighters have the greatest mix of freight including pallet based as well as containerised cargo and is consequently the least mechanised.

Manston's target market for freight will be principally be freighters but with express freight and in-house e-commerce operators like Prime also likely to be targeted. Manston will also offer plane to truck handling and serve specialist equine, perishable and emergency aid operations, none of which lend themselves easily to automation. This means that the scope

for mechanisation of the handling process is less likely at Manston than might be the case at airports like East Midlands and Heathrow, meaning any reduction employment potential from mechanisation is nominal.

COMMENTS

- 1. Applicant has not supported any of its statements with evidence.
- 2. Applicants' response does not appear to be consistent with:
 - 2.1. response to question ND.1.25 re IATA's Global Shipper's Surveys "show that speed is the number one selling point for air cargo transport ... advantage can be gained from speed in innovation and use of analytics, product development time to market" and
 - 2.2. "... express freight and in-house e-commerce operators like Prime also likely to be targeted"

- 2.3. Trends are clear for major e-commerce companies such as Amazon and just-in-time logistics companies investing heavily in automation, including automation of "freight including pallet based" e.g. recent Amazon 7 year agreement in Balyo's autonomous forklifts, UPS \$20m investment in automation, and DHL investment in automated supply chain leading to a 25% increase in productivity³¹.
- 2.4. It would appear from most forecasts that what little growth there is in air freight industry appears to be driven largely by e-commerce. Given importance of speed, accuracy, automated integration of these markets, huge investment in automation from key players and suitability for typically smaller packaged products for automation, it is surely naive or disingenuous of the Applicant to suggest that automation is not a factor.
- 3. Applicant's answer regarding larger or more specialist items or goods that are (a) more suited to freight-only aircraft and (b) less suited to automated handling is logical, but requires a level of interrogation as regards viability, business model, size of market, geographical distance from key hubs of these industries. Further, it is logical, at least, that such sectors are more "niche, with irregular spikes in seasonal demand rather than the high productivity and 24/7/365 market demands on e-commerce.
 - 3.1. E.g. Applicant has referenced **equine market** presumably based on previous reported use of Manston as equine handling facility during London 2012 Olympics. Obviously this was a one-off event, unlikely to be repeated in the near future, which begs the question of where are the race tracks, thoroughbred breeding stables, key sources of supply and demand for this market anywhere near Manston? Is Doncaster Airport which has

³¹ Appendix SE: 013 - Amazon makes 7-year deal with French robotics company, 11 January 2019

		also been investing heavily in pure-freight operations - not better positioned, for ex	xample?
		3.2. E.g. 2 - Applicant has also claimed it will enter the Formula One and luxury car	
		transport market. This does not seem at all realistic given the market dominance	of East
		Midlands, its geographic location close to the Midlands automotive industry, the hi	<mark>uge</mark>
		investment DHL has made in its East Midlands hub and DHL's worldwide exclusiv	<mark>re</mark>
		logistics and sponsorship contract with Formula 1 ³³ .	
		Any opportunity to properly interrogate validity of Applicant's response to SE.1.3 is some	
		hampered by lack of clear responses to Funding & Resources questions with regards to	
		Business Model and Costings. Since very few details have been provided of how exact	
		Applicant intends to approach each market - or any sense that it even understands or is	
		up for the unique characteristics or requirements of each market - suggest the Applicant	
		taking a "scatter gun" approach of claiming they will go for any and every market without	
		strategy as to how it will do so, what the requirements are and - therefore - whether or no	<mark>ot</mark>
		automation really should be a genuine concern or not.	
SE.1.4	TDC	nanet Local Plan	
		OC's Draft Local Plan to 2031 (dated 26 October 2018) states at Policy SP02 that:	
		lanston Business Park is the key location for advanced manufacturing and large scale job creating developmen	nt."
		eplain the effect that the consenting of the DCO could have on the attraction of advanced manufacturing ge scale job creating development.	g and

Appendix SE: 014 - Air Cargo News - North of England Airport site set for further expansion, June 2018
 Appendix SE: 015 - Formula 1 - The World's Fastest Logistics Race, DHL

		Applicant's Response:
		N/A
SE.1.5	The Applicant	Concern in [RR-1601] is raised over the levels of perceived optimism applied to job creation figures.
		i. Provide further justification and detail for the stated employment creation figures for the airport, including direct and indirect figures.
		ii. Do the skills exist locally for construction workers to be sourced from the local area?
		Applicant's Response:
		i. A wide range of potential formula were examined. The Azimuth analysis (APP-085) adopted a 'top-down' approach to employment estimation in line with IATA and ACI guidance; the note attached as Appendix SE.1.5
		(TR020002/D3/.vFWQs/Appendices) adopts the alternative 'bottom-up' approach as further justification for the figure of 2,417 jobs that is arrived at by the Azimuth Report. The Azimuth figures include an accompanying explanation of the component elements and the assumptions on which they are based as follows.
		Direct Jobs:
		East Midlands Airport, as a main UK freight hub provides the best comparator airport to the planned operation at Manston. In addition to the formula derived from East Midlands, a 2% adjustment for productivity gains has been introduced from Year
		11. The reason for the choice of Year 11 in this case is that Manston Airport would be a new operation and relatively small, with operations taking a number of years to settle into a phase where productivity substantially affects job numbers.
		Indirect/Induced Jobs:
		No data on indirect and induced jobs could be found or derived for East Midlands Airport. Figures for Stansted Airport, as another key UK freight operation, are available and are corroborated by the operation at Luton Airport. This was therefore deemed to be the most appropriate formula to use in the Manston forecast.

Catalytic Jobs:

Two standard formulae were identified: 4,650 per 1,000 direct jobs (Intervistas, 2015) and 4,000 (6,100 less 2,100) per 1,000 direct jobs (ICAO, 2000). In order to be as conservative as possible in this category, which covers a wide range of jobs in the national economy, the lowest of the two formulae was applied in the Manston job creations forecast.

Figures for construction workers have been calculated separately using a comparison to other similar projects such as at Cambridge and Dublin Airports. This is detailed in APP-085 Volume IV Section 5.4. Forecasts for jobs created by the airport operator were handled separately and shown as such in Table 6, paragraph 5.2.2. These figures show the number of jobs by airport function.

ii. There are skills shortages in the construction sector affecting the South East region, which the South East Local Education Partnership (SELEP) is working to address. East Kent College is providing training in construction skills in the local area with particular courses covering carpentry, painting & decorating, plumbing, electrical as well as brick laying and other trades. The college is actively seeking to recruit teachers in construction, including plumbing, electrical, building services, plastering, carpentry, multi-trades and maintenance operations. Thanet has an unemployment rate of around 5% compared to around 3.2% in the South East generally. The claimant count (NOMIS December 2018 data) in Thanet was:

• Males 2,575

• Females 1,700

• Aged 16 to 24 860

Aged 25 to 49 2,275

• Aged 50+ 1,140

The jobs density figure for Thanet, which represent the ratio of total jobs to population aged 16-64, is 0.70 compared to 0.87 for the South East. This figure shows that creating jobs in Thanet is vital to improving the local economy and improving the life chances of local people. 7.6% of the Thanet population have no qualifications compared to 5.2% in the South East. The Applicant hopes to raise the aspirations of local people by providing the opportunity for employment and demonstrating the need for skills. It is to this end that the Applicant has worked for around two years with East Kent College to ensure sufficient and appropriate courses and apprenticeships will be provided locally.

The Applicant has held regular meetings with East Kent College over the last two years to establish the best way to encourage the creation of skilled workers locally who could take up the opportunities at Manston Airport. The Applicant is also engaged with Canterbury Christ Church University to offer higher-level skills, particularly in engineering subjects. This engagement is ongoing and the university is in the process of constructing and opening a facility for Science, Engineering, Technology and Health on the Canterbury campus. The School of Engineering will support the Kent and Medway Engineering, Design, Growth and Enterprise Hub (KM EDGE), an initiative designed to unlock regional economic growth and employment in engineering, science and technology sectors. The commitments will be captured in a s.106 agreement with Kent County Council, a framework of which was discussed at the meeting of 9 January 2019 (see Appendix SE.1.7 in TR020002/D3/TR020002/Appendices).

COMMENTS

1. NOTE ON EXPERTISE

We recognise that jobs creation and training are two of the most sharply felt needs amongst the DCO supporters, both across the political spectrum and - more importantly for the local and wider community. A lot of hope and expectation has been built up amongst those supporters that the Applicant can deliver on its promises, so there is all the more need to robustly challenge the applicant in these areas and make absolutely sure that there are no false promises being made or false hope being offered.

- 1.1. We have refrained until now from detailing our own areas of expertise, although there are many areas of broad and specific knowledge across the application of some relevance. Given the importance of this particular section and the personal commitment, passion and career-long experience we have for education, talent and skills development, we feel that a brief precis of our knowledge, experience and expertise may be of some use before commenting, further.
- 1.2. It must first be noted that the our particular sectoral expertise in skills development is in Creative and Digital. As the ExA may be aware, however, skills development is a regulated and process driven business that is readily transferable across sectors. Indeed, experience within our team includes working on cross-sector projects, largely through the Federation for Industry Sector Skills & Standards ("FISSS") an organisation whose very function is to enable cross-sector knowledge sharing across national skills development organisations.
- 1.3. Broadly and briefly, our skills development experience includes, but is not limited to:

- National lead on drafting and developing Creative and Digital Apprenticeships (both under the previous apprenticeship 'framework' regime and the newer apprenticeship 'standards')
- Former Head of Delivery and Development for national sector skills agency, responsible for apprenticeship development team across the entire creative industries, UK-wide
- Assessor and Chair for UK-wide programme of industry engagement quality assurance programme for UK universities Head of Department for the quality assurance programme
- Lead on international cross-sector skills-mapping programme with UKIERI (UK/India skills partnership)
- Current board trustee for youth skills, talent and education organisation

General Comments

- 2. Given the importance of this section of the Applicant's proposal to the local community, it is deeply depressing if not immoral that the general lack of care and attention that is so prevalent across that Applicant's approach to the Examination process is also so evident in its approach to the employment and skills programme, such that it is.
- 3. The Applicant is not clear at all about what is meant by a "top down" or "bottom up" approach in this context and has not specified or provided which guidance it is referring to, exactly, from IATA or ACI, although we can perhaps assume these are the reports referenced in Azimuth. Proper referencing would have been useful, however.
- 4. The 'note' referenced in Appendix SE.1.5 appears to have been written in haste and lacks both clarity and detail.

Forecasting, Job Roles, Skills Profiling and NOS

- 4.1. I do not intend to focus too long on the jobs forecasting methodology per se. To be frank, it seems the Applicant hasn't focused on it too long either, so I shall pay it short shrift save to say I note it appears to be predicated on a formula developed for a predominantly passenger airport, so not sure how or why it applies here. Or why on earth the Applicant feels that East Midlands airport is the most comparable airport.
- 4.2. Regardless of whether or not Dr Dixon's formula makes sense in general, (it doesn't), there is a fundamental issue in that any such a formula is being used at all.
- 4.3. I do not know of any business, of any size, in any sector whose starting point from a human resources point

of view is to take such a blunt instrument approach as to work backwards from - say - "I want to operate across x amount of land, so I need to fill that with y amount of buildings that will each need to make z amount of product. So how many people do I need?", without also putting some consideration into the roles, functions and skills that likes behind those numbers. I can only assume this is what Dr Dixon means by a "top down" approach, and like most top down approaches it is fundamentally lacking in either humanity or common sense ... let alone business sense.

- 4.4. Any workable skills strategy starts from just that: Skills. The clue is in the name.
 - What skills do I need on my management team? My board? What level of experience? (VERY worryingly, the Applicant doesn't even seem to have this part right. This is square one!).
 - What am I going to be delivering? And what job roles do I need to recruit for to deliver that? (And I mean precisely. Not "Passenger", "Freight" and "Operations").
 - What skills are needed to fulfill those job roles?
 - What standards or levels are those skills required at? Is there any regulatory oversight or statutory requirement on any of those skills or roles?
 - Which of these skills can I hire in locally? Which do I need to 'buy' in? And what training programme
 do I need to put in place to fill them?
 and so on.
- 4.5. Then and only then can you start looking at numbers how many people in each role and what will they cost? What will the training cost be, how will it be delivered and by whom?
- 4.6. I can only guess that this is what Dr Dixon means by a "bottom up" approach. That's sort of logical. The problem here is she seems to have used only the phrase, but not followed it through with the concept, which suggests a fundamental lack of understanding.
- 4.7. The sub-dividing of the roles in both the Azimuth Report and the 'note' referred to in the Appendix is at a depressingly basic level.
 - 4.7.1. I can well imagine that this makes the ExA's job difficult to derive any real meaning or value from the breakdown. And I sympathise. But of far greater concern is that as a working document for the Applicant it is impossible to determine what function this 'broken down' chart fulfils or how they can hope to develop any kind of skills strategy from this that can possibly deliver the number of jobs

they have specified in the time need to do so.

- 4.7.2. What does "Passenger" mean? How is that subdivided? What does 'Freight' mean? What sort of jobs, exactly, does that entail and how many of them?
- 4.7.3. Starting with a number just a bulk number "96,553 tonnes of freight equals 856 McJobs" -and then breaking down into such generic headings is of no use, AT ALL, to a business that may need to start recruiting within the next 12-18 months. Does the Applicant have even the slightest idea of how difficult that is going to be?
 - 4.7.3.1. The only purpose such a generic and meaningless breakdown serves is frankly to bluff. It is no use for budgeting purposes, ("how much does someone who works in 'passenger' get paid?). It's no use for training or education purposes. (What courses or qualifications does a 'Freight' person need?). It's no use for planning purposes. (How are these resources of generic people going to be deployed across the operation?). So why is it there?
 - 4.7.3.2. Quite honestly, the only possible answer is it is there for show to give this farce the vague appearance of being thought out. It is, of course, quite possible that the Applicant has somewhere a detailed staffing chart and this is all finely worked out. So why not present it to the ExA?

Why is this important - and why is it important now?

- 5. There hasn't been an airport here for five years. Even when there was, it employed 144 people at the time of closure and it was a very different beast to the kind of operation the Applicant claims to be developing. So where are all these specialist aviation skills going to come from? One would assume people will have to be trained.
- 6. This is a long process. To put it into some perspective, the last apprenticeship standard I was involved in took just over two years to develop. For **one** job function. And that's before you can even start sourcing a training provider to deliver it.
- 7. I note the Applicant claims to have "held regular meetings with East Kent College over the last two years", although there is absolutely no evidence of this. This is probably a good thing as our education system is stretched and

wasting their time in meetings before you have the first idea of what your skills needs are or how and when you want them delivered does no good to anyone.

- 7.1. The Applicant has nevertheless provided in its Appendix at DL3 minutes from at least one meeting, dated 9th January, (Appendix SE1.7). Notwithstanding the somewhat surprising rosta of attendees on the RSP side, (why is Dr Dixon there, exactly? Or Tina Cardy-Jenkins from the fuel farm? What is their role in all of this?), the minutes of the meeting play out pretty much exactly as I would expect them to from the educationalists' side, i.e.
 - 7.1.1. Very first action: "It is vital for EKC and CCCU to have data on the demand for aviation-related courses and range required. Without this it will be difficult to assess how viable courses might be and to establish capital, staffing and funding requirements".
 - 7.1.2. Yes! Of course it will! The fact the Applicant did not even consider this and yet set up the meeting surely not coincidentally on the day the Examination started says everything.
 - 7.1.3. The only surprise here is that this meeting was set up at all before the Applicant had even thought about putting together such information. Not just for the colleges, but did they not imagine that this info might also be pretty crucial for themselves too?
 - 7.1.4. We note the discussions at the meeting about potential skills funding for skills mapping via SELEP. Is this the same Applicant who has been banging on for some time now about not needing or wanting any public money? Also, couldn't this money be put to good use at this moment in time for a more deserving candidate that at least has some idea of what it wants and is in a position to deliver it?
 - 7.1.5. Why is the Applicant talking to Locate in Kent about a skills gap analysis? What is their expertise in Aviation skills, specifically? Is the Applicant aware of any sector-based skills partnerships or apprenticeship boards?(I can name three, and I'm not in this sector). If so, have they talked to them? If not, why not? Are they aware of which apprenticeship standards have already been developed, what's in the pipeline, who has developed them?
 - 7.1.6. All of this matters if the Applicant is at all serious about delivering its plans.

	7.1.7. Interestingly, it seems from the minutes of this meeting that the one thing the Applicant seems to
	get serious about is starting to talk about what buildings and facilities they are going to need to
	include. I would suggest - at the risk of sounding like a broken record - that finding what you skills
	you want/need first and then perhaps thinking about what kind of training facilities they might
	require would be prudent.
	i oquito modita de praticina.
8.	To the ExA
<u> </u>	TO THE EXA
	I am aware that much of this section will come across as a rant, and for this I feel I must apologise.
	Taill aware that much of this section will come across as a failt, and for this free it must apologise.
	The twith is that this matters your much I feel that the Applicant has already wested a let of people's time (not least
	The truth is that this matters very much. I feel that the Applicant has already wasted a lot of people's time, (not least
	our own) - but also statutory bodies, interested parties, the wider public - in submitting an Application that - if you
	will please forgive me - is so very clearly deficient on so very many levels and yet the process requires us to read it,
	review it, rebut it and so on.
	Most of all, though, my anger at the skills piece is the thought that this Applicant is dangling a lot of false hope that
	they are so ill-prepared to deliver. It is immoral. Now, here in the minutes of this meeting, I see talk of them wanting
	to set up meetings with other colleges, with schools, talking as if they care about "engaging with hard to reach
	groups" and "children in care as well as offenders". In other words, vulnerable people.
	This should not happen unless and until they are in a position to actually offer them something concrete. And the
	starting point for this, quite frankly, is for the Applicant to first get its own act together. Anything less is absolutely
	irresponsible.

Ref No.	Respondent	Question
SE.1.6	The Applicant	Has any account been taken of potential job transfers or losses from other areas, should the proposal succeed in attracting freight operations from other airports?

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		Applicant's Response: No account of job transfers or losses from other areas have been incorporated into the Applicant's socio economic analysis, since the Proposed Development will meet currently unmet demand rather than displacing existing business. Since the Applicant does not foresee any reduction in ATMs at other airports, it is unlikely that overall job numbers at other airports will be affected by the re-opening of Manston Airport.
SE.1.7	The Applicant	i. Has the Applicant identified potential partners for training schemes for required employment positions? ii. Has the Applicant identified potential educational partners and initiatives for required employment positions? Applicant's Response: i. Yes. The Applicant has been working with East Kent College for around two years to identify the training schemes required to ensure local people have the necessary skills to apply for vacancies created by the airport operator and their supply chain partners. Additionally, the Applicant has been in discussions with other partners. Most recently, a meeting was held between the Applicant, Kent County Council – the Education People, Dover District Council, Canterbury Christ Church University, East Kent College, and Kent and Medway Skills Commission on 9 January 2019 (the note of the meeting is appended at Appendix SE.1.7 in TR020002/D3/FWQ/Appendices). A further meeting has been arranged for 20 February 2019 at which representatives from Thanet District Council and Swale Borough Council will also attend. The Applicant is also in discussion with Discovery Park as a potential partner.

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Ref No.	Respondent	Question
		ii. Yes. The Applicant has been working with both East Kent College and Canterbury Christ Church University for around two years. Work is progressing to establish need across a range of disciplines. In terms of school engagement, key to raising aspirations and ensuring young people consider electing to study STEM subjects, the Applicant is working with Kent County Council (The Education People) and their Enterprise Advisors in East Kent.
		COMMENTS
		1) See comments at SE1.6 above. Applicant should not be setting up these meetings until it has a clearer idea of what it wants and needs and how it should be going about it. Ideally, also not until the Applicant is in better position to be able to deliver - perhaps having secured investors in place might be a good place to start.
		2) Can the Applicant provide any evidence of "working with" East Kent College and Canterbury Christ Church for "around two years"? Given the minutes of the meeting of 9th January read very much like the kind of things they should have almost certainly discussed at the outset, it is unclear what they have been working onwith these partners for the past two years.
SE.1.8	The Applicant	Is there more information over a proposed community trust fund? [AP-034, Table 15.3]
		Applicant's Response: The community trust fund is secured as part of the Noise Mitigation Plan (APP-009). The proposal is for a sum of £50,000 per annum to be paid into the fund by the Applicant together with any penalties applied to aircraft operators for off-track flights and excess noise. The community consultative committee will be responsible for making decisions as to the allocation of funds which will be applied to community projects within the 50dBLAeq (16 hour) day time contour and the 40dBLAeq (8 hour) night time contour. This is distinct from any payments made under the Compensation Code.

MANSTON DCO: SUBMISSION FOR DEADLINE 4 COMMENTS ON APPLICANT'S RESPONSE TO ExA's FIRST WRITTEN QUESTIONS (SOCIO-ECONOMIC) SUBMITTED BY FIVE10TWELVE LTD

СОМ	COMMENTS		
1.	The population of Thanet is 139,772, (Source: ONS, 2015). Which makes that Community Fund almost as much as 38p a head. We have no further comment on this point.		
2.	save to say it is unclear why the fund is only for those who live outside the worst affected areas - i.e. those in the lower noise contours. Can the Applicant explain the rationale for this?		
i.			

SE-001

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Visit Thanet Business

Working together to grow the Thanet Visitor Economy

Tourism contributes at least £319 million to the Thanet economy each year supporting 7,950 jobs (Cambridge Model Economic Impact Survey 2017 (/business-support/research/cambridge-economic-impact-model-2017/))

More than 4.2 million visitors come to Thanet every year to discover and explore our three prime coastal resorts – Margate, Broadstairs and Ramsgate; our Blue Flag beaches; our villages; our heritage; and our thriving and growing cultural scene. The Isle of Thanet is rapidly becoming **the place** to visit, to work and to live.

We have a five-year Destination Management Plan to build our visitor economy: Making Thanet a better place for visitors, businesses and residents. The plan has been drawn up by Thanet District Council working in partnership with many stakeholders from local businesses and organisations. **Find out more** (/destination-management-plan/)

This website describes how Thanet Tourism Team is working with local businesses, investors, residents and industry partners to deliver the Destination Management Plan. You will find out more about the people in the team, our business support services and training opportunities, different ways to get involved in on and offline promotional activities and campaigns, and most importantly how to keep in touch.

Please join us in our bid to deliver a top quality Thanet visitor experience – to grow our businesses, boost our economy and create new jobs.

To receive our monthly enewsletter 'Tourism Matters' with the latest news and training opportunities for businesses, please sign up here (https://www.visitthanet.co.uk/tourismmatters/)

The Shared Story (/destination-management-plan/thanet-destination-management-plan-september-2013/a-shared-story-for-thanet/)



See more (/destination-management-plan/thanet-destination-management-plan-september-2013/a-shared-story-for-thanet/)

Destination Management (/destination-management-plan/) (/destination-management-plan/)



See more (/destination-management-plan/)

Shared Story Toolkit (/shared-story/)



SE-002

Manston Airport under private ownership:

The story to date and the future prospects

Position statement



Introduction

For decades Kent County Council has made great efforts to develop aviation at Manston Airport.

Manston, with its proud history as a front-line Battle of Britain aerodrome, has long been a symbol of Kent's determination in the face of adversity.

But our desire to stimulate and grow Manston was not the result merely of nostalgia or sentimentality.

For decades we have been aware of the commercial potential of Manston's long, 2,700 metre runway. For decades we have championed Manston's proximity to London. For decades we have argued that Manston was a sleeping giant: a regional and national asset.

Our 2012 policy document 'Bold Steps for Aviation' made all this clear and promoted the development of Manston to the Government as an alternative to building a controversial new runway in the Thames Estuary.

Our support for Manston has not merely consisted of kind words and encouragement. We have invested substantial sums of public money.

We have made substantial investments in both road and rail infrastructure to improve access to Manston and East Kent.

Our record in supporting Manston is plain to see and we are proud of it.

It was disappointing and regrettable to learn that all our hard work and investment, and the hard work of the various companies that had tried to make flying profitable at Manston, had failed.

Manston's story began in 1915 when it was a small grass airfield operated by the Admiralty. Now a new chapter is about to begin that will bring new jobs and new prosperity to East Kent. It will be our duty to encourage, guide and nurture to help ensure this happens.

This document sets out the story of Manston Airport over the last 16 years, from its sale by the Ministry of Defence to the present day. We also consider the future, which we are confident will be bright.

Hansard 28th April 2014

Robert Goodwill, Parliamentary Undersecretary of State at the Department of Transport

'Whatever the result of efforts to secure such a resolution (on Manston), 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'.

Chapter one

The last 16 years of private ownership

Since the Ministry of Defence sold RAF Manston in 1998, the airport has never made a profit and has never delivered on its promise of jobs for the area. When the airport closed on 15th May 2014 144 people were employed there.

Since 1998 three companies have tried and failed to run Manston as a viable business. The Wiggins Group, with its start-up low cost carrier EUJet, launched scheduled flights to twenty one destinations in Europe in 2004 but collapsed into administration in the summer of 2005 leaving 5,400 passengers stranded. Its fleet of five 108-seat Fokker 100 jets were repossessed by Debis Air Finance.

Infratil Limited, which bought Manston from the administrators in 2005, lost between £40 - £50 million over the next nine years attempting to achieve passenger numbers of over a million per annum. The highest number of passengers was 50,000. Similarly its ambitious plan to grow freight traffic failed.

Lothian Shelf (417) Limited, a company owned by Mrs Ann Gloag, bought Manston for £1 in November 2014. In the next 4 months the airport made revenue losses of £100,000 per week plus significant capital losses.

Mrs Gloag's decision to sell the airport was based on an assessment that these losses could not be sustained. Mr Trevor Cartner and Mr Chris Musgrave acquired 80 per cent of the company in order to provide space for a wide range of businesses, with a focus on attracting companies in the manufacturing sector, as well as the provision of housing, shops, schools and community facilities.

Chapter two

The Wiggins era 1998-2005

In 1998 Wiggins Group acquired Manston Airport for £4.75 million. Its company accounts show that between 1999 and 2002 the company reported losses of £8.6 million, with a further loss of around £2 million reported over the next two years.

In January 2004 Wiggins Group renamed itself Planestation and later that year Planestation bought 30 per cent of airline company EUJet.

In September 2004 EUJet operated flights to destinations across Europe. That year Planestation's losses were £73 million and the company had to borrow £46 million at an interest rate of 28%. In December Planestation bought the remaining 78 per cent of EUJet.

In its busiest month in early 2005 the airport carried 62,709 passengers. EUJet's aim had been to handle over 750,000 passengers per annum but the company became insolvent and went into administration.

In July 2005 all EUJet operations were suspended along with all non-freight operations.

Mr Tony Freudmann had overseen Manston's transfer from an RAF base to a commercial operation. He was Senior Vice President of Wiggins Group between 1994 and 2005. He was 'let go' by Wiggins in February 2005. He is now the spokesman for the RiverOak consortium.

The Wiggins Group and Planestation failed in their ambition for Manston to become a successful international airport; but even then, more than 10 years ago, they also had ambitions for property development on the airport site, in collaboration with property developers MEPC plc.

Chapter three

INFRATIL 2005-2013

Infratil Limited is a successful company listed on the New Zealand stock exchange with the primary purpose of investing in electricity distribution, public transport and ports. The company was established in 1994 with NZ\$50m of capital. At the time it acquired Manston and Prestwick airports it controlled assets worldwide in excess of NZ\$ 4.4 billion.

Following Wiggins' demise, Infratil Limited bought Manston Airport from the Administrator for £17 million in August 2005.

In addition to Manston, Infratil also owned Prestwick, Flughafen Lubeck, Wellington and Auckland Airports. Its master plan for Manston (published in November 2009) envisaged building a new passenger terminal to accommodate up to 3 million passengers per annum. It also envisaged building a parallel taxi way to the runway and an increase in the freight and passenger aprons. At the time of publishing its plan the airport was handling 32,000 tonnes of freight per annum. The master plan envisaged freight growth of between 4% and 6% per annum to equate to approximately 167,000 tonnes of freight per annum by 2018. It also planned on developing corporate jet facilities with an executive terminal.

In 2009 the airport was handling fewer than 50,000 passengers per annum. Infratil forecast that by 2014 this figure would rise to 527,000, by 2015 to 1,268,000 and by 2033 to more than 4.7 million passengers per annum. In 2009 the airport employed approximately 100 people, some full time and some part time. Infratil forecast that they would be employing more than 500 staff by 2014, 2,800 by 2018 and 6,150 by 2033.

When the airport closed in May 2014 there were 144 people employed at Manston Airport.

In 2012 Infratil announced that Manston and Prestwick airports were for sale.

In each year that Infratil Limited owned Manston it incurred losses of more than £3 million per annum and wrote off the purchase price of £17 million.

As at 31 March 2013 Infratil's investment in the UK's airports had a book value of \$20m and over the year a further \$12m was contributed to meet costs. Their sale price crystallised a net economic cost of \$32m."

(Infratil financial results 2013-14)

In 2013 KLM started passenger flights to Schiphol Amsterdam. However, over its 12 months of operation its seventy eight seat Fokker planes were less than half full (42 per cent of capacity). KLM operations at Manston made no significant financial contribution to the cost of running the airport.

In November 2013 Infratil Limited sold Manston Airport and the associated liabilities to a company controlled by Mrs Ann Gloag for £1.

Chapter four

Manston Skyport Limited 2013-2014

Mrs Ann Gloag originally approached Infratil with a view to buying both Manston and Prestwick airports, which were being sold as a package. However, Infratil set a deadline for their sale in order to stem their losses. When the Scottish Government bought Prestwick for £1 Mrs Gloag agreed to buy Manston also for £1.

From the discussions that Kent County Council had had with her and her team we believed that she had every intention to maintain and grow the aviation business at Manston Airport.

She gave a press interview with the Isle of Thanet Gazette on 8 August 2014 to dispel the myths and uncertainty that had been widely propagated by campaign groups opposed to the subsequent closure of the airport.

"Can you please outline the reasons behind your decision to close the airport?"

"The prospect of new passenger and freight opportunities failed to materialise and the scale of the losses meant that there was no credible prospect of the airport becoming profitable."

"Would you have bought it if you'd known you would have to close it just months later?"

"I wanted to make it a success and I didn't buy it to close it. Our whole team worked tirelessly to secure new business for the airport but no new operators considered it a viable option. It was only when our aviation team arrived at Manston that we started to discover the scale of the problems."

"Why did you reject RiverOak's offers to buy it?"

"They were introduced to us as a potential buyer and in good faith we entered into discussions with them. However, we had serious concerns from the outset about the way RiverOak conducted their business with us. We are aware of the £7 million figure that has been made public by RiverOak. For clarification, the structure of their offer meant the final amount would have been considerably less. They also failed to provide any business plan to back up their claims of future employment or to reassure us that their bid offered commitment to maintain it as an operational airport."

Prestwick airport made a pre tax loss of £10 million in its final year of ownership under Infratil.

After buying the airport for £1 the Scottish government said it could take a number of years for taxpayers to see a return on public investment in Prestwick.

It announced a £10 million commitment towards 'operating costs, repairs backlog and improvements to the terminal building.'

Prestwick is continuing to lose £1 million a month.

Chapter five

Support given to Manston by Kent County Council over the past 16 years

Kent County Council's support of Manston as an airport over the last 16 years has been unwavering.

Transport infrastructure

Kent County Council has made or enabled substantial transport and infrastructure investment for the benefit of Manston and the surrounding area.

In 1997 Columbus Avenue was constructed on the north side of the airport at a cost of £1.52 million. These infrastructure works were funded through the European Regional Development Fund and the Single Regeneration Budget.

In 1998 Kent County Council completed the A299 Thanet Way extension of the M2 through to Ramsgate.

In 2000 Kent County Council completed the Ramsgate Harbour Approach Road and in 2009 the Euro Kent link road.

The A256 dualling was completed in 2012 and £87 million was invested in the East Kent Access Road in 2013.

Kent County Council is in the planning stage of the £6.7 million Westwood relief scheme to help growing businesses at Westwood and Manston.

Network Rail has just announced the commencement of its £11 million scheme to reduce journey time between Ramsgate and Canterbury; Kent County Council is contributing £4.5 million to the cost of this upgrade. Kent County Council has also committed £12 million to a new Thanet Parkway Station near Manston.

Business premises;

In Spring 2006 Kent County Council acquired the undeveloped area of Manston Business Park, amounting to some 40 acres of developable land, from the Administrator of Planestation plc for £5.35 million.

Manston Business Park and the EuroKent sites subsequently became the key holdings of a joint venture between Kent County Council and Thanet District Council.

By 2015 Manston Business Park has seen the development of industrial units which will be occupied by start-up and small developing businesses.

Support for aviation

In its discussion document Bold Steps for Aviation (May 2012) Kent County Council supported the increased use of Manston Airport and stressed its potential to make a significant contribution to aviation in the UK.

"In Kent, Manston has the potential to make a significant contribution [to the UK's aviation capacity], providing excellent communications to European destinations and reduced flight times.

In addition:

- Over the years Manston has received more than £1million in financial assistance from Kent County Council. When EUJet commenced its flights in 2004 Kent County Council bought a 1.5% shareholding in EUJet Ops Limited.
- In 2007 Kent County Council provided financial assistance to enable the start of charter flights from Manston to Virginia USA, although these flights were discontinued shortly thereafter.
- Between May 2004 and May 2005 when EUJet Ops Limited was acquired by Planestation Limited, Kent County Council acquired options to buy further shares. Planestation Limited was however put into liquidation and the council's investment had no further value.
- When KLM expressed an interest in starting scheduled flights to Amsterdam, Kent County Council provided £100,000 to Visit Kent, the tourist agency which provided marketing and tourism support.

Support offered to investors at the airport

In March 2013, when Infratil were seeking aviation buyers for the airport, Kent County Council distributed a note offering to help new investment at Manston Airport through:

- Financial assistance from the Regional Growth Fund
- Use of land owned by Kent County Council adjacent to the airport
- Expediting the new Thanet Parkway station
- A Route Development Fund to increase the number of passengers
- Working with airlines and train operating companies to achieve integrated ticketing
- Discussing with Ministers to seek assistance from Government. Kent County Council's offer to any investor with a viable business plan remains open, although to date we have received no take up.

Helping to find a new airport operator

Kent County Council met PWC, the agents selling the airport, with a view to helping find a viable new owner/operator. Over 18 months discussions were held with thirty interested parties including low cost airline operators and private investors, many were introduced to PWC by Kent County Council.

In the event, two of the shareholders of Discovery Park Limited made an approach to Mrs Ann Gloag which subsequently led to their purchase of the airport.

Chapter six

What do we know about RiverOak and its proposal for a compulsory purchase order?

RiverOak was introduced to Kent County Council by Mr Tony Freudmann. Subsequently the Leader of Kent County Council invited representatives of RiverOak to meet to discuss their plans for the airport. RiverOak declined, saying that their plans were confidential. The invitation to present their business plan to the council has been repeated on several occasions: RiverOak has always declined to do so.

RiverOak Investment Corp LLC was established in January 2001 in Delaware USA to manage 'niche focussed real estate investments for institutional entities that are strategically driven, including private and public pension funds.'

Its CEO is Mr Stephen DeNardo.

The RiverOak website states 'within a time frame that spans nearly 4 decades of business experience, Steve DeNardo has successfully been involved in all phases of real estate investment, development and management. His focus and interest has been on the management and turnaround of troubled assets.'

RiverOak's Chief Investment Officer is Mr George Yerrall. The website says: 'He is in charge of sourcing and analysis of investment opportunities and the execution of investment and asset management strategies.'

In its statement to the UK Airports Commission (The Davies Commission) RiverOak described its strategy for Manston as handling 250,000 tonnes of cargo per annum by 2030, 500,000 tonnes of cargo per annum by 2040 and 750,000 tonnes by 2050. It also described its long term strategy to include 'aircraft maintenance, repair and teardown operations.'

RiverOak also stated that by summer 2017 at the earliest they would plan to re-open passenger services 'if appropriate contracts can be agreed with suitable carriers.' They would also re-establish Manston as a key diversion airport, capable of providing emergency resilience to the wider South East airport system.

In an interview on 12 May 2014 with Paul Francis of the KM Group Mr DeNardo was asked 'How did RiverOak become involved in the bid to buy the site from Mrs Gloag?'

Mr De Nardo replied; 'We have been active in searching for opportunistic transactions in both the UK and Ireland, We have an extensive network of contacts in both and one of our contacts made us aware of the Manston situation.'

He was also asked 'How did you team up with Annax Aviation whose Chief Executive Tony Freudmann has become spokesman for your bid?'

Mr DeNardo replied: 'Our contacts put us in direct discussion with Tony Freudmann who we knew had both operational experience at the airport and had made an attempt to purchase the airport.'

Following Mrs Gloag's refusal to accept an offer from RiverOak to buy Manston Airport, RiverOak then approached Thanet District Council with a view to the council making a Compulsory Purchase Order of the airport in favour of RiverOak. Thanet District Council concluded that a decision on a CPO could not be made until:

- Thanet District Council had commissioned an independent feasibility study on the future viability of a going concern operational airport.
- Any prospective airport owner/operator submit a viable business plan and also enter into an indemnity agreement that would cover any exposure to all costs placed upon Thanet District Council.

Thanet District Council commissioned Falcon Aviation whose report was considered by the Council's cabinet on 31st July 2014. The report identified 'no business plan with a credible investment plan of less than 20 years is likely to provide the commitment necessary to rebuild confidence. From an investor's standpoint, the payback period might be as long as 50 years. The level of investment would have to be significant (£100m's) and there are never any guarantees of success.'

Throughout Thanet District Council's consideration of a CPO it has been advised by its Section 151 Officer that it appears evident that the airport will not be successful if it reopens and attempts to operate in the same configuration as it has done previously up to its closure.

The advice to Thanet District Council's cabinet was that invitations should be issued to parties willing to enter into an indemnity agreement capable of delivering the twenty year business plan.

During the course of Thanet District Council's processes, on 17 July 2014, Kent County Council unanimously adopted the following motion;

"Kent County Council supports the actions taken so far by Thanet District Council to retain Manston as a regional airport. We recognise the value that a regional airport brings to East Kent and are disappointed at its closure. Kent County Council will explore with Thanet District Council ways in which it can support proposals to retain Manston as an airport." The original Motion proposed by Mr Cowan (Dover Town, LAB) and Mr Truelove (Swale Central, LAB) was replaced by the above, proposed by Mark Dance (Whitstable, CON).

In supporting the amended motion the Leader of Kent County Council said "Thanet District Council's approach is now such that they are going to carry out and have already commissioned, an independent study as to the viability of running the airport as a going concern or not. Nobody knows the conclusion to that, as I said on the radio this morning, after 16, 17, 18 years of Manston, everybody has just lost money. So what is the market telling you? And it will be interesting to see what the independent viability report concludes. And Thanet District Council are absolutely right in doing that. If it does suggest there is viability they will then ask for expressions of interest from people to come forward who have the ambition to do exciting things at Manston in running it as an airport, or not. And if there are some exciting propositions, or if we had an owner that is reluctant to do anything exciting, which again we don't know, we will then make the decision as to whether or not to support the CPO process. And it is premature to have that decision now, which is why we can't support your original motion which was asking for an open ended commitment to support Thanet and their CPO, no matter what. I want to see, and hope, that there are exciting propositions that come forward, with good people, that have got the money to do exciting things. And we will have to wait and see as to whether that's the case, and then we will review our position."

In an endeavour to support Thanet District Council, on 1st September Kent County Council's Director of Governance and Law wrote to Thanet District Council's' Monitoring Officer to remind them of our offer to assist the council. The Monitoring Officer replied: 'We need to do the evaluation of any Expressions of Interest first before we can begin to assess what legal support might be needed moving forward and whether any of that support would need to be commissioned from Kent County Council. We are not in a position to make any decisions until we have the result of this, but I will be more than happy to consider making such an approach at the appropriate time.'

Kent County Council has never been approached by Thanet District Council for the help offered.

Unsuprisingly, **as a result of this**, on 11 December 2014 Thanet District Council recieved a cabinet report detailing the outcome of its excercise to seek an indemnity partner for the compulsory purchase of the airport and a comprehensive and viable business plan. The following was decided:

'That no further action be taken at the present time on a CPO of Manston Airport on the basis that the council has not identified any suitable expressions of interest that fulfil the requirements of the council for a CPO indemnity partner and that it does not have the financial resources to pursue a CPO in its own right.'

The conclusions made by the council's Section151 Officer were that 'The information provided does not provide assurances which would satisfy him that a valid expression has been put forward and he is therefore unable to recommend moving ahead with this proposal. Although the issues here are emotive Members should excercise extreme caution before seeking to move forward with any proposal which is at odds with advice from its officers, particularly where there are likely to be **significant risks** which would affect the council at a fundamental level.'

As the Falcon report, Thanet District Council's feasibility study and the advice from the council's 151 Officer show, the financial risks of a compulsory purchase of the airport were unacceptable.

Chapter seven

What do we know about Discovery Park Limited and its directors?

The new owners of Manston, Chris Musgrave and Trevor Cartner, have a strong track record in taking over large difficult sites following the demise of earlier uses and regenerating them to create jobs and bring economic benefits to the wider area.

Ten years ago they acquired Wynyard Park in Billingham after Samsung had announced that it was closing its operations there. They have now created 2000 jobs and have attracted £200million of private investment at Wynyard Park.

Seven years ago they invested in the advanced manufacturing manufacturing park (a joint venture between the University of Sheffield, Boeing, British Aerospace and Rolls Royce) to build seventeen units for local small and medium size enterprises associated with aerospace research and other advanced manufacturing on the site of the former Orgreave colliery. In 2013, when the site was fully occupied, they sold their investment.

In 2012 they acquired Discovery Park from Pfizer after Pfizer had announced that they were closing down all their operations there and were planning to demolish the buildings at the site. When Pfizer made this announcement they employed 2,200 staff all of whom were subject to redundancy notice. By March 2015 700 of the Pfizer jobs have been retained and a further 1,700 jobs have been created by more than 100 new tenants on the site. Currently total job numbers are in excess of 2,400 and Discovery Park is on track to deliver more than 3,000 new jobs.

Trevor Carter and Chris Musgrave plan to transform the 800-acre site at Manston with a £1 billion redevelopment, over a 20-year period, into a mixed-use scheme helping to create more than 4,000 jobs. They will be announcing more details over the next few weeks.

Conclusions

The truth is that Manston has failed over a prolonged period of time to run as a commercially successful airport.

Kent County Council gave strong support to various investors but the reality of commercial aviation at Manston Airport led to very significant losses. In fact, in the 16 years since it was taken into privately ownership it has incurred losses by those who have tried to operate it in excess of £100 million.

The objective now must therefore be to make sure that we have owners who want to do exciting things on the site and that the land is not left abandoned.

Bristow Group had chosen Manston as its location for the regional search and rescue base; when the airport closed the company decided to locate that base at Lydd. Kent County Council is pleased that this vital service will still be located in Kent. Lydd Airport is also starting a substantial investment programme to extend its runway and construct new aviation facilities.

Surely it is now time to look at a B Plan for Manston.

The driver must be to seize the best opportunity to create a significant number of new jobs and bring prosperity into East Kent.

RiverOak has not managed to convince Thanet District Council that there is a viable business plan. We believe the new owners have got a credible plan and the financial ability to create substantial numbers of new jobs which will bring prosperity and economic growth to East Kent.



Paul Carter, Leader of Kent County Council:

"I would like to make it abundantly clear that in my 10 years as Leader of Kent County Council I have done everything in my power to help and support the economy of East Kent. I believe that this document demonstrates and evidences exactly that."

Myth busting questions and answers

 What is Kent County Council's stance on Manston Airport? At first you supported a CPO process but now you are supporting a business park – is this not inconsistent?

Promoting job creation, supporting business growth and generating economic prosperity for the residents of East Kent is - and always has been - Kent County Council's primary objective. Kent County Council (KCC) has never deviated from this.

The closure of Manston Airport was met with deep disappointment at County Hall. Any viable proposal from an aviation company with sufficient financial backing to run Manston as an airport would have been strongly supported by Kent County Council as our debate at the July council meeting made clear. No viable proposal was presented to Kent County Council or TDC.

The sale of Manston to the Discovery Park Team Musgrave and Cartner in September offers substantial private sector investment to support job creation and economic growth for Thanet. Cartner and Musgrave have a strong track-record at Discovery Park with 1,700 new jobs since 2012.

2. How can you say no viable proposal came forward? Didn't RiverOak say they would pay the full asking price?

Kent County Council asked RiverOak if we could see their business plan. RiverOak has consistently refused to let us see any details on the grounds they are commercially confidential. TDC took a decision that the information supplied by RiverOak to it was insufficient to support a Compulsory Purchase Order. We have therefore concluded that RiverOak's plan is not viable. Representatives of Mrs Ann Gloag explained to the Transport Select Committee why Mrs Gloag refused to accept the offer from RiverOak. 2

http://democracy.thanet.gov.uk/documents/b10075/
 Supplementary%20Agenda%202%2031st-Jul-2014%20
 19.00%20Cabinet.pdf?T=9

² http://parliamentlive.tv/Event/Index/d4330491-c83e-4204-a339-28a011b42071 3. Did you promote Manston to the best of your abilities to attract a new investor when the closure was announced? Is it not true that Manston has unique infrastructure with the longest runway in England and superb transport links?

Kent County Council has taken every opportunity to support and promote the use of regional airports such as Manston. The authority's discussion document Bold Steps for Aviation, written in 2012, makes our position abundantly clear, showing Kent County Council has lobbied central Government to prioritise Manston above other proposals, such as the establishment of a Thames Estuary Airport.

Our support for Manston is evidenced by our substantial investment in transport infrastructure making Manston more accessible to a greater potential customer base, including investing in the East Kent Access Road, a new railway station, and improving the rail infrastructure. The Regional Growth Fund has been made available to companies with plans to increase employment.

Since the Minister of Defence privatised the airport there have been three private owners of Manston Airport: Wiggins, Infratil, and Ann Gloag. Despite ambitious plans to increase passenger numbers and freight operations, each of these has sustained significant financial losses totalling over £100 million.

When Manston Airport was put up for sale, Kent County Council introduced PWC (the marketing agents for Infratil) to 30 potential buyers from around the world (including RyanAir) none of whom in the event decided that they could make the airport profitable.

Myth busting questions and answers

4. What offers of support were made by Kent County Council to Thanet District Council to assist them with their CPO process?

We very much supported Thanet District Council in the potential for a CPO subject to the outcome of their independent feasibility study and submissions by indemnity partners.

At the Leader's request, Kent County Council's Director of Governance and Law offered to help Thanet District Council in the CPO process. TDC responded in writing saying "We need to do the evaluation of any Expressions of Interest first before we can begin to assess what legal support might be needed moving forward and whether any of that support would need to be commissioned from KCC. We are not in a position to make any decisions until we have the result of this, but I will be more than happy to consider making such an approach at the appropriate time."

The offer of support was repeated several times by the Leader at different meetings with Iris Johnston.

5. Who now owns Manston? Is it Mr Cartner, Mr Musgrave, Ann Gloag?

The company that owns Manston Airport has three shareholders; Mr Cartner (40%), Mr Musgrave (40%), and Mrs Gloag (20%). This information has been provided to the Select Committee by solicitors acting for Mr Cartner and Mr Musgrave.

6. How could the Leader of Kent County Council support Mr Cartner and Mr Musgraves' purchase of the site? I have heard Wynyard Park is in debt and promised to supply thousands of jobs and only a proportion have been realised.

Information provided to Kent County Council shows that Wynyard Park is currently debt free. Under Mr Cartner and Mr Musgraves' ownership, Wynyard Park has created more than 2000 jobs and attracted £200million of private investment. Publications which have asserted that

this is incorrect have been served with a letter from a firm of solicitors specialising in libel.

(NOTE: It is quite normal for development companies to carry debt/bank borrowings on their balance sheet. The key is sensible debt to value ratios).

7. How can you be excited by the new proposition by Cartner and Musgrave if you have seen no plans? What are the plans?

The new owners issued a press release when they acquired Manston Airport outlining their intention to create more than 4,000 jobs and a £1 billion redevelopment. They will be announcing more details in the next few weeks.

At the time when Mr Cartner and Mr Musgrave outlined these plans to the Leader of Kent County Council, the planning consultants had not yet completed the master plan so no document was handed over. However, a fairly detailed description of what was envisaged was discussed. The plans include a new sports centre and the financial backing of the Spitfire museum, as well as plans to bring advanced manufacturing to the site.

8. How can Kent County Council ignore its democratic mandate? Haven't you seen the petitions showing that the people of Thanet want an airport?

The Save Manston Campaign was invited to County Hall to present its petition. However when representatives of the group arrived they had not brought it with them. All letters and emails from objectors have received replies. We have also received letters of support re the closure.

9. When have you met Ann Gloag or her colleagues and what was the purpose of each meeting? Are the minutes available? Was a change of use discussed?

Elected members and officers of the council met Ann Gloag and her company representatives on a number of occasions before and after she bought the airport. The purpose of the meetings was to establish what were her intentions for bringing jobs and new investment to Kent and to sustain a viable airport.

Myth busting questions and answers

At a meeting on 14 March 2014 when we were expecting an update on progress, much to our suprise we were told confidentially that given the scale of losses it had been decided to notify staff the following week that a redundancy process was necessary.

Subsequently a meeting was held on 3 July 2014 to discuss with Ann Gloag what she intended, and she explained she was discussing a possible sale but that the details were commercially confidential.

10. Why have you appeared to support Ann Gloag when she obviously bought the site to turn it into a housing development and never intended to operate an airport? Have you a vested interest? Did you not say you wanted a housing development last year?

Mrs Gloag told us that it was her intention to run Manston Airport as a commercial venture and that was why she hired aviation specialists to put in place a strong business plan for aviation and support the implementation. She also retained the previous Managing Director of Manston, Mr Charles Buchanan. She told us subsequently that it was only when she was advised that the airport could not be made viable, and that the losses of £100 thousand per week could not be sustained, that she decided that the airport must be closed.

During our discussions, a change of use of the airport was not discussed although we did touch on alternative uses for parts of the airport site such as aviation hangar space, servicing and maintenance. The Leader of the Council has no private business interests in the Manston site and will not benefit personally from any proposal relating to the development.

11. Thanet does not need more business parks.
Existing local business parks are struggling to attract businesses and are over 50% empty.

When Pfizer announced closure of its R&D facility at Sandwich it was a common view that all the buildings would need to be demolished and the site could not be redeveloped.

Mr Cartner and Mr Musgrave have successfully applied for planning approval for a multi-use development to include commercial, retail and housing: the site is currently over 50% reoccupied by commercial users and there are now 2,400 jobs. It was their success with Discovery Park that persuaded them of the potential at Manston, and they already have a number of substantial potential tenants.

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Supplementary memorandum submitted by the Civil Aviation Authority

BRIEFINGS ON EUJET OPS LTD

sECTION 1-INTRODUCTION

At its session on 2 November, the Transport Committee requested additional briefing on the failure of EUjet in July 2005.

The Committee specifically asked whether EUjet's parent company had changed its name twice and had been suspended from the London Stock Exchange:

- The company was first registered as the Southend Sand & Gravel Company in 1945, changing its name to Wiggins Group plc in 1981 and then to PlaneStation Group plc in 2004.
- Before it invested in EUjet, Wiggins Group's shares were briefly suspended at its request in July 2003.

The rest of this paper gives additional information on the company and its failure.

sECTION 2-EUJET HISTORY, OWNERSHIP AND FAILURE

EUjet

From its establishment in 2003, EUjet was based at Shannon Airport and licensed and regulated by the Irish *Commission for Aviation Regulation*. A schedule outlining significant events in the company's history is at Annex 1. EUjet was initially established to provide wet lease[3] services for other airlines, but in early 2004 started undertaking charter passenger services in its own right, and in September 2004 began scheduled passenger services between Shannon and Manston. At the time of its collapse in July 2005, the company operated 23[4] routes from Manston to various points in Europe, with the UK representing some 87% of the company's passenger carryings, and six routes from Shannon.

EUjet was founded by Patrick J McGoldrick, who also became its CEO. A number of members of his family held senior management positions. In 2004 he was appointed to the board of PlaneStation, which had by then become EUjet's parent company.

Mr McGoldrick is an Irish national with a long background in the aviation industry as a pilot and senior manager. Between 1986 and 1991 he was the CEO of Ryanair. Subsequently, Mr McGoldrick was CEO and founder of TransAer (previously known as TransLift, a cargo and wet lease specialist carrier that moved into passenger services), which failed in 2000 with a loss of 450 jobs and debts in excess of £30 million.

DlanaStation

PlaneStation Group plc, EUjet's parent company at the time of its collapse, was a publicly quoted UK property group listed on the London Stock Exchange that owned and managed a number of small European airports. The company was first registered in 1945 as the Southend Sand & Gravel Company, becoming Wiggins Group plc in 1981 and PlaneStation Group plc in January 2004. The Group has always been involved in either land management or property development. Indeed its investment in EUjet was primarily seen as a means of developing the Group's airport property portfolio.

In March 2001, as Wiggins Group plc, it received censure from the Financial Reporting Review Panel and the Financial Services Authority for overestimating its results between 1995-2000, which on their restatement resulted in significant losses. It was agreed with the Financial Reporting Review Panel that the Group's treatment of certain costs and assets would be reclassified and a number of new non-executive directors would be appointed to its audit committee. A number of directors left the Group following completion of this enquiry. In July 2003 the Group's shares were briefly suspended at its own request while it was in discussions on a possible takeover. These events occurred, however, well in advance of its investment in EUjet.

PlaneStation investment in EUjet

EUjet was initially funded by private equity. In May 2004 it was refinanced by PlaneStation, the owner of Manston Airport (which became Kent International). PlaneStation also owned, and developed, a business park around Manston Airport. It sought to develop Manston from a small cargo airport into a major passenger hub that could eventually compete with Luton and Stansted airports. PlaneStation invested in EUjet as a strategic development towards that goal.

Initially, PlaneStation invested £2 million in EUjet in return for a 30% shareholding. At the same time Kent County Council took a 1.5% shareholding in EUjet in order to assist in the regeneration and development of east Kent. The County Council did however acknowledge, in a statement published in September 2005, that EUjet represented "a high risk investment". EUjet was again refinanced in September 2004 when it commenced scheduled operations. PlaneStation stated that EUjet had insufficient funds to support the commencement of scheduled operations in the summer of 2004 as originally intended and provided it with additional working capital of £5 million, funded through a placing of PlaneStation shares. In return for this additional investment PlaneStation took an option to purchase 100% of EUjet, with the interests of the existing EUjet shareholders being translated into warrants in PlaneStation. PlaneStation exercised this purchase option in December 2004, having at that point raised an additional £30 million equity from the City to support EUjet and to fund its own development. It is unclear what proportion of this additional funding was required to support EUjet. At this point PlaneStation also began a process of disposing of a number of property assets with the stated intention of raising additional capital to support EUjet's development.

It appears that, in the event, EUjet's passenger numbers were lower than expected. On 28 June 2005 PlaneStation announced the sale of 75% of the business park adjacent to Manston Airport and that the funds from that transaction would be used to support EUjet. However, this sale later broke down and evidently led to an eventual cash crisis. On 25 July 2005 PlaneStation announced the suspension of its public listing, stating that negotiations on extending its finance facilities with its bankers, whose position would seem to have been secured on property assets, had been unsuccessful. An Administrator was subsequently appointed to PlaneStation in the UK, with the Irish equivalent, an Examiner, being appointed to EUjet in the Republic of Ireland.

SECTION 3-REGULATORY ASPECTS AND ROLE OF THE CAA

Regulatory environment

EC Regulation 2407/92 governs the licensing of airlines within the European Economic Area (EEA)[5], of which the UK and Ireland are member states. It sets out the framework within which Member States have to consider the granting of an Operating Licence permitting public transport flights.

Subject to an applicant satisfying the relevant licensing authority that it can meet the above criteria, both on initial grant of the Operating Licence and on an ongoing basis, then, under the terms of the Market Access Regulation[6], it is permitted to operate anywhere within the EEA without the need to hold further licences. Therefore the CAA must allow carriers licensed in other Member States to operate within its territory. Such carriers continue to be regulated by the Member State that granted the initial Operating Licence. The CAA has no legal powers or regulatory authority to act (except on evident safety grounds) on the operations of non-UK EEA carriers, such as EUjet. The Irish Commission for Aviation Regulation monitored EUjet under the terms of EC Regulation 2407/92.

The CAA

The CAA does, however, maintain a watching brief on the UK aviation industry as a whole. Press reports and the CAA's own industry sources suggested that EUjet and its parent PlaneStation were encountering financial difficulties earlier this year. However the Regulatory Announcements that PlaneStation had issued to the City indicated that these problems were being comprehensively addressed. The CAA requires regular financial information to be provided by UK licensed airlines for monitoring purposes, but does not receive, nor is able to require, information from non-UK airlines such as EUjet. The CAA was therefore unaware of the actual financial position of that carrier and, in any case, had no legal powers to take action against it. Under the terms of the Market Access Regulation, the CAA would not have been able to prevent EUjet either operating from the UK or from selling tickets to UK passengers.

Furthermore, the CAA could not have taken any action to warn passengers not to either book or travel with EUjet. First, the EC Market Access Regulation is undertaken on a mutually reciprocal basis. If the CAA publicly stated that it was concerned with the regulatory methods employed by any other Member States, it would be exposed to censure by the European Commission and the possibility of UK carriers being discriminated against by other Member States in return. Second, the CAA does not act on the basis of unsubstantiated rumour. It has to act lawfully within its powers on the basis of proper evidence; otherwise it would be open to action in the courts. The CAA did carry out an analysis of the impact of the failure on passengers because the majority of EUjet's passenger carryings were from the UK.

Principal place of business

Although the EC Licensing Regulation (2407/92) gave the CAA no legal role in regulating EUjet, the CAA was concerned with the possible consequences that might arise from the failure of it and similar carriers. The concern was that the CAA and other UK authorities would be wrongly perceived as being responsible for the regulation of such carriers. The CAA is looking at this issue with the Department for Transport.

EC Regulation 2407/92 requires that the principal place of business of a licence holder has to be in the Member State that grants the company's Operating Licence. The CAA has always considered there to be a possible risk where a company is ostensibly registered, licensed and regulated in one Member State but its operations are predominantly undertaken in another. The CAA wrote to the European Commission on the interpretation of this requirement in 1995. It was advised that an operator's principal place of business should be determined on a wider basis than just where a company is registered. This decision would include an evaluation of where its administrative and operational base is situated, where management and board decisions are taken and where "a carrier . . . operated principally in a particular Member State [it] should normally be licensed by that Member State".

In its original guise, as a wet lease provider and charter operator, EUjet was clearly an Irish carrier; but following its evolution into a scheduled operator its operations primarily centred on the UK. CAA research of January 2005 indicated that at that time some 87% of EUjet's then 81 flights per week were departing from the UK. The company was also, by that point, owned by a UK plc and the CAA's view was that it was unlikely that the majority of board decisions would be made in Ireland.

The CAA approached the Irish *Commission for Aviation Regulation* explaining that it believed that EUjet's principal place of business was now in the UK and it should therefore be regulated here. The Irish authorities rejected this.

SECTION 4-LESSONS FROM EUJET EXPERIENCE

The Committee will already have had a copy of the CAA's paper *The Failure of EUjet—An Analysis of Customer Experiences* (copy attached for ease of reference). Following EUjet's failure, some EUjet customers contacted the CAA, which gave out what information and advice was available, but was unable to do more than that. The CAA has no role in repatriating or refunding the passengers of failed scheduled airlines, even if they are regulated in the UK. ATOL financial protection only covers air packages (and seat-only tickets not sold directly by airlines and agents).

EUjet operated a fleet of four Fokker F100 aircraft, which could carry up to 104 passengers. In UK terms it was a small airline and, therefore, as the Ernst and Young analysis for the CAA forecast, there was sufficient capacity available for people to repatriate themselves.

In the light of the EUjet experience the CAA has considered the implications for voluntary repatriation schemes by airlines. The CAA considers that a voluntary scheme would not be as effective, or as cheap, as a managed scheme. To be effective all UK airlines would need to participate and the scheme would require a set of basic principles, which the airlines would have to abide by. These would include:

- appointing a coordinator to provide support and assistance to customers, and manage capacity;
- offering bookable flights (that are easy to purchase and not standby) at a flat rate for a sufficient period of time;
- communicating the information to airports, airline staff, and the media;
- ensuring that all routes are covered.

24 November 2005

- 3 Wet lease-flights undertaken by an operator on behalf of, and at the direction of, another operator who is provided with an aircraft, the flight crew and usually cabin crew. <u>Back</u>
- 4 Source March 2005 OAG Airline Guide. Back
- 5 European Economic Area-the Member States of the European Union plus Iceland, Norway, Lichtenstein and, for the purposes of aviation, Switzerland. Back
- 6 EC Regulation 2408/92. Back



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Manston Airport

Manston Airport, formerly IATA: MSE, ICAO: EGMH, is a closed British airport. It was branded as Manston, Kent International Airport and is located in the parish of Minster-in-Thanet and partly adjacent to the village of Manston in the Thanet district of Kent, England, 11 NM (20 km; 13 mi) north-east of Canterbury. Formerly the site of RAF Manston, it was briefly known as London Manston Airport. [2] The single runway is located about 1 mile (1.6 km) from the coastline at 178 ft (54 m) above sea level.

At 2,748 m (9,016 ft) long, it has the 11th-longest civilian runway in the United Kingdom (after Heathrow's two runways, Gatwick, Birmingham, Manchester, Stansted, East Midlands, Doncaster, Prestwick and Belfast International), [3] Manston was capable of handling some of the larger long-haul aircraft, but the runway was not long enough for the largest passenger or freight types at their maximum takeoff weights. [4][5][6] The runway was originally built with three "lanes" during the war to handle emergencies, and is among the widest in Europe.

After an announcement on 6 May 2014,^[7] the airport closed on 15 May 2014 with the loss of 144 jobs.^[8] When closure was announced, campaign group Save Manston Airport was formed by a local campaigner, along with other groups such as Supporters of Manston Airport, Manston Works and Save Manston Airport Association, as well as the existing Why Not Manston? group. The groups petitioned the local council, Thanet District Council, to issue a compulsory purchase order (CPO) to save the airport, in conjunction with a private indemnity partner. A US-based investment group, RiverOak, put forward a plan to re-open the airport, with an initial emphasis on cargo and aircraft recycling operations^[9] but the council refused, after Riveroak had failed to supply the information it required, including financial status.^[10] Riveroak now plans to attempt the same using a development consent order (DCO).^[11] The proposed development has been named Stone Hill Park.^[12]

On 2 February 2015, Manston Airport was discussed in a Commons Select Committee evidence session as part of its Smaller Airports Inquiry. [13] The committee's report was published on 9 March 2015. [14]

In January 2016, Thanet District Council announced a new soft market-testing process to find indemnity partners for the compulsory acquisition of the former airport. ^[15] The next month, the council announced that a total of five expressions of interest had been received, and after responses were received to a follow-up questionnaire, three were carried forward to the next stage of the CPO process. ^[16]

In the later part of 2018, Manston Airport became part of <u>Operation Stack</u>, and will be used as a queuing point for lorries using the Port of Dover in the event the stretch of the M20 between Junctions 8 and 11 reaches overcapacity. [17]

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History

Origins

At the outset of the First World War, the Isle of Thanet was equipped with a small and precarious landing strip for aircraft at St Mildred's Bay, Westgate-on-Sea, on top of the chalk cliffs, at the foot of which was a promenade which had been used for seaplane operations. The landing grounds atop the cliff soon became the scene of several accidents, with one plane failing to stop before the end of the cliffs and tumbling into the sea, which, fortunately for the pilot, had been on its inward tide.

In the winter of 1915–1916, early aircraft began to use the open farmlands between Minster and Manston as a site for emergency landings. The Admiralty Aerodrome at Manston was opened in response. A training school, originally set up to instruct pilots in the use of the new Handley Page Type O bombers, was soon established. By the close of 1916, there were already two units stationed at Manston: the Operational War Flight Command and the Handley Page Training School.



Passengers

Aviation Authority[1]

12.508

Sources: Statistics from the UK Civil

Its location near the Kent coast gave Manston some advantages over other aerodromes, and regular additions in men and machinery were soon made, particularly from Detling, in early days. By 1917 the Royal Flying Corps was well established and taking an active part in the defence of Britain.

Battle of Britain and the Second World War

Manston was used as a forward base by many squadrons during the <u>Second World War</u>, owing to its location close to the front line. It was frequently attacked and heavily bombed during the Battle of Britain. Barnes Wallis used the base to test his bouncing bomb on the coast at nearby Reculver, prior to the Dambusters raid.^[18]

Hawker Typhoon and Gloster Meteor squadrons were based at Manston during the war. On 27 July 1944, RAF 616 Squadron became the first allied jet equipped squadron in the world to become operational, using Meteors to intercept German V-1 flying bombs aimed at London. Manston's position close to the front line and its long and broad three lane runway (built during the war, along with the runways at Woodbridge and Carnaby near Bridlington) meant the airfield was heavily used by badly damaged planes that had suffered from ground fire, collisions, or air attack but retained a degree of airworthiness. The airfield became a "graveyard" for heavy bombers and less-damaged aircraft, offering spare parts for allied aircraft in need of repair. The museum on site displays some aerial views dating from this era and the post-war years.

Post-war military and civil use

During the Cold War of the 1950s, the United States Air Force used Manston as a Strategic Air Command base for its fighter and fighter-bomber units. The USAF withdrew from Manston in 1960, and the airfield became a joint civilian and RAF airport, employed for occasional package tour and cargo flights, alongside its continuing role as an RAF base. Air Cadets used the northern side of the airfield as a gliding site, and an Air Experience Flight flying de Havilland Chipmunks was based there. Manston was used as a diversionary airfield for emergency military and civilian landings.

Manston became **Kent International Airport** from 1989, and a new terminal was opened by <u>Sarah</u>, <u>Duchess of York</u>. Summer season charter flights operated by <u>Dan-Air</u> to Palma, Mallorca were introduced on Saturdays, using <u>BAC One-Elevens</u>. The Yugoslavian carrier <u>Aviogenex</u> operated regular charters to the then-popular beach resorts of the then Yugoslavia on behalf of the now defunct Yugotours.

Kent International Airport was initially a 38 acres (150,000 m²) civilian area within the former RAF Manston that included the existing terminal building and an apron where passengers embarked and freighters were loaded. The runway was not included within this enclave. In 1988, the owners of Kent International Airport signed a 125-year legal agreement with the RAF that obliged the RAF to maintain the runway, as well as to provide ongoing air traffic control and fire & rescue services. The cost of providing these was estimated at up to £3m per annum by the Ministry of Defence.

Sale and commercial operations

After an absence of regular charter services, Aspro Holidays operated a series of summer charter services during the 1992–93 summer season with its in-house airline Inter European Airways to Palma, Mallorca and Larnaca, Cyprus using the Boeing 737, and added a service to Heraklion, Crete, which was often operated using its larger Boeing 757 airliner. When Aspro was taken over by Airtours, the flights ceased. The early 1990s also saw weekly flights to Larnaca, Cyprus by Cypriana Holidays, with Eurocypria operating the inbound flight via Norwich as a split load. The service continued for approximately two summer seasons before Cypriana went into administration.

A 1993 report by the <u>Department of Trade and Industry</u> examined runway capacity in <u>south east England</u> and found Manston unsuitable for development as a major airport because of its proximity to a town. Nevertheless, in 1998, <u>Thanet District Council</u> produced the Isle of Thanet local plan, which recognised the economic development potential of abandoned sections of the old military airfield, particularly on its north-western edge. After the plan was published, the Ministry of Defence announced its intention to sell RAF Manston, and following a ruling by government instructing government departments to generate money through the sale of surplus assets, the MoD sold Manston.

After the RAF left, local Labour MP Stephen Ladyman opposed the decision to sell the base to property developer Wiggins Group plc. The RAF faced a compensation claim of £50–100 million if it then closed the base and terminated its earlier agreement with Kent International Airport. The MoD sold the site at the end of March 1999 for £4.75m to the Wiggins Group, which inherited the legal agreement obliging the RAF to continue maintenance of the airfield. Within six months, the RAF announced that it was leaving the airfield.

The airfield site comprises $700 \ acres (2.8 \ km^2)$.

Expansion

In December 2003 a Government White Paper on The Future of Air Transport stated that Manston "could play a valuable role in meeting local demand and could contribute to regional economic development", and would support development in principle, "subject to relevant environmental considerations". [19]

Development began in 2004 in an attempt to make it a <u>budget airline hub</u>. Irish airline <u>EUjet</u>, formed in 2002, began scheduled flights in September 2004 to UK destinations such as <u>Manchester</u>, <u>Edinburgh</u>, and international destinations <u>Dublin</u> and <u>Geneva</u> with a small fleet of <u>Fokker 100</u> <u>airliners</u>. New car parks and a direct coach service from <u>Bluewater</u> via <u>Chatham</u> were introduced to support these flights.



Fokker 100 of EUjet on arrival from Manchester on 31 March 2005

In May 2004, the airport operator PlaneStation bought 30% of the shares in EUjet, and in January 2005 it completed its takeover by acquiring the remaining 70%. On 26 July 2005, the airline went into administration and all EUjet flights ended,

along with all non-freight operations at the airport, owing to financial difficulties with the airline and airport owner, PlaneStation. Its business plan was ambitious and when the bank lenders <u>foreclosed</u> many passengers were left stranded abroad. London Manston Airport plc went into liquidation. Operations then temporarily ceased, and Manston's aerodrome traffic zone and radar services were suspended, until after a new buyer could be found.

The sale of Manston to Infratil, a company based in Wellington, New Zealand and owner of Glasgow Prestwick Airport, was completed on 26 August 2005. [20] In July 2006 a charter route between Manston and Norfolk, Virginia, was announced: it was cancelled prior to commencement because of low bookings. It was to be operated by tour operator Cosmos in conjunction with Monarch Airlines.

 $Luxembourg-based \underline{Cargolux} \ started \ flying \ for \ \underline{Ghana \ Airways} \ from \ \underline{Accra} \ to \ Kent \ International \ on \ 17 \ April \ 2007.$

Charter flights were operated from Manston by Seguro Travel Ltd, operating as Kent Escapes. The 2007 Kent Escapes flights were operated by Sky Wings using a McDonnell Douglas MD-80. Seguro then swapped operators on 16 August and flights were taken over by BMI for a period. At the end of the season, flights were operated by Futura International Airways, a Spanish-based airline, using the Boeing 737. [21] Futura ceased trading during September 2008 and Seguro on 10 September 2008. [22]

On 15 February 2010, former airport CEO Matt Clarke and Flybe head of PR Niall Duffy announced a daily service operated by Flybe from Manston to Edinburgh, Kirkwall, and Sumburgh, Belfast, and Manchester. The services were the first daily scheduled routes at Manston since the collapse of EUjet in 2005. Dash-8Q400 aircraft were used. Air Southwest announced seasonal charter services to Jersey every Saturday using Dash-8 aircraft. The Flybe services to Kirkwall and Sumburgh were operated by the once-daily flight to Edinburgh and then by Loganair to the onward destinations.

Departures were offered during summer 2011 to Funchal, Madeira with specialist operator Atlantic Holidays, operated by UK charter airline Monarch Airlines but then discontinued.

Newmarket Holidays continued to offer irregular charter flights during the summer months to Verona and Naples in Italy, as well as Porto in Portugal using the Lithuanian charter airline Small Planet Airlines for the summer 2013 season.



View across part of the airport

Iran Air used Manston as a fuel stop for flight 710 from Heathrow to Tehran due to fuel disputes in London, until 1 December 2011. [23]

Decline

On 22 December 2011, Flybe spokesman Niall Duffy announced that all Flybe services would cease from Manston Airport by 25 March 2012. [24]

On 8 March 2012, Infratil announced it would dispose of its European airport operations, placing Kent International and Glasgow-Prestwick airports up for sale. [25] Manston and Prestwick had been running at a loss, and in May 2011 Infratil's annual report showed that losses from its European airports grew from £9 million to £11 million in 2010. [26]

On 31 July 2012 a pressure group Why Not Manston? was formed, aiming to support greater use of Manston airport.

On 14 November 2012, KLM Royal Dutch Airlines announced twice daily flights from Manston to Amsterdam, with onward connections via the KLM network. The first flight was with a Fokker 70 on 2 April 2013.

From July 2013, <u>British Airways</u> has operated test flights and crew training for the <u>Airbus A380</u> from Manston, ^[27] which was followed by a similar exercise for the Boeing 787 Dreamliner aircraft. ^[28]

On 15 October 2013, Infratil announced it would sell the airport to a company wholly owned by <u>Ann Gloag</u>, co-founder of Stagecoach Group. Manston Skyport Ltd took over running the former airport on 29 November 2013. [29]

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A British Airways Airbus A380 undergoing crew training at Manston

Closure and aftermath

On 19 March 2014, it was announced that a 45-day consultation period into the closure of the former airport had begun. [30] Daily losses were said to be £10,000. [31] The airport's chief executive announced that the airport could close on 9 April 2014, [32] and on 25 March 2014 KLM Royal Dutch Airlines announced the end of its flights to Amsterdam by 10 April, [133] and Manston's last scheduled flight departed for Amsterdam on 9 April 2014.

On 12 April 2014, Newmarket Holidays said its Verona and Naples seasonal charter flights would move to the expanding Lydd Airport.

The closure of the former airport was announced on 6 May 2014; this took place on 15 May 2014. [7]

On 31 July 2015, it was announced that the site might be used to house overflow lorries from Operation Stack. To prevent lorries from parking on the motorway during busy periods, freight traffic bound for the Port of Dover might be diverted to the airfield and held until it can be directed to the ferry services. [34]

On 26 October 2016, local newspaper the *Thanet Extra* reported that the owners of the site had received payments totalling £3.539 million from the <u>Department for Transport</u> to keep Manston Airport on standby as a lorry park for Operation Stack. [35]

Redevelopment proposals

Following closure, a campaign was launched to reopen the airport, although the airport's owner stated its intention to redevelop the site.

In 2014, an American private equity group, RiverOak Investments, put forward a proposal to acquire the site and reopen it as an airport, with an initial emphasis on cargo and the recycling of aircraft. [36] This would have required the local council to use a compulsory purchase order (CPO), with RiverOak as indemnity partner, covering the costs incurred. In a council cabinet meeting on 11 December 2014, the <u>Labour</u>-controlled cabinet decided not to proceed with a CPO at the present time, stating

"That no further action be taken at the present time on a CPO of Manston Airport, on the basis that the Council has not identified any suitable expressions of interest that fulfil the requirements of the Council for a CPO indemnity partner and that it does not have the financial resources to pursue a CPO in its own right".

RiverOak being the only candidate in the initial soft market testing, no further action was to be taken on the CPO until other suitable candidates had been sought through a further round of soft market testing. [37][38][39][40][41] After a change in the control of the local council in the 2015 elections, the newly elected council decided to again look at using a CPO to re-open the former airport. [42]

Subsequent to the DofT report commissioned from PwC, [37] into the decision not to proceed, a second examination of RiverOak took place, following the suggestions made by PwC. RiverOak failed to provide the information required by the council to proceed with a CPO, leading TDC to decline to proceed with a CPO using RiverOak as indemnity partner for a second time. [10]

In December 2015, it was announced that RiverOak would undertake a <u>development consent order</u> (DCO) process to acquire permission from central government to reopen the airport.

In June 2016, the site owner submitted a planning application to Thanet District Council, seeking permission for 2,500 homes, commercial sectors and public parkland, under the name Stone Hill Park. [43]

The <u>Planning Inspectorate</u> launched an inquiry into the proposed change of use of buildings on the site from aviation to non-aviation in July 2016. [44] In August 2016, Thanet Council commissioned AviaSolutions, an aviation consulting firm, to conduct a study into the feasibility of the site reopening as an airport. [45]

During August 2016, the developers of the proposed Stone Hill Park criticised RiverOak, stating a belief that the company would develop Manston into a "24/7 industrial scale cargo hub". [46] This view was supported by a campaign group, No Night Flights, which also warned of daily and nightly flights to and from the airport. [47] RiverOak subsequently made public a media statement discussing inaccuracies in the allegations by No Night Flights. [48]

AviaSolutions released its findings in October 2016, stating that it did not believe an airport would be successful in the long-term on the site. [49]

In November 2016, it was made public that Edi Truell, a leading city financier and previously the pensions and investments adviser to the then Mayor of London, Boris Johnson, [50] was keen to acquire Manston and return it to an operational airport. [51] That month, the date for the public inquiry was announced as 24 January 2017 after the previous meeting due 1 November 2016 was postponed. [52]

In February 2017, it became public that Disruptive Capital, with Edi Truell as chairman was to commission a report on its plans for Manston Airport. [53] After a response to the news by Stone Hill Park, Edi Truell made public his team's investment in 14 airports around the world and \$68 billion of long-term infrastructure investments. [54]

On 7 February 2017, RiverOak Investments spent its first day on site after gaining access to Manston Airport to carry out work as part of their development consent order (DCO).[55]

On 2 May 2017, it was announced that a new potential aviation investor was intending to approach Thanet District Council regarding a compulsory purchase order. Dale Crawford of DTD Consult is acting as spokesperson for the investment group, said to be a US logistics company with roots in Europe which already has plans to base 12 of its clients' aircraft at the site and able to invest over £100 million. [56]

In August 2018, the UK government's Planning Inspectorate accepted the plans for examination for an air based freight hub, but the final decision will rest with the public inquiry and the Secretary of State for Transport. [57]

Airline operations prior to closure

Prior to 10 April 2014, there was one cargo service and one passenger service (KLM to Amsterdam) operating from Manston. Cargo flights before closure were operated by Cargolux to Johannesburg, Luxembourg, Maastricht and Nairobi; and by Saudia Cargo to Amsterdam, Dammam, Jeddah, Johannesburg and Nairobi.

Non-passenger operations

Two museums, the RAF Manston History Museum and the Spitfire and Hurricane memorial, are located on the northern edge of the airfield.

The large hangar was originally built and used by <u>Invicta International Airlines</u>; between 1987 and 2004 Modern Jet Support Centre Ltd used it for <u>Boeing 707</u> and <u>McDonnell Douglas DC-10</u> servicing, before entering administration; between 2006 and early 2009 it was used by airline <u>DAS Air Cargo</u> (which was taken over by Continental Aviation Services in November 2007) to maintain its aircraft as well as those of <u>World Airways</u>, <u>Omni Air International</u>, <u>Gemini Air Cargo</u>, and <u>Avient Aviation</u>, before entering administration. AvMan Engineering Ltd took over the hangar in 2009, and has CAA approval to work on <u>BAe-146</u> and their ALF502 / LF507 engines.

A helicopter business remains operational, located immediately outside of the airport curtilage. $^{[58]}$

A second helicopter business (<u>Polar helicopters (http://www.polarhelicopters.co.uk/)</u>) remains operational on the airfield and provides a radio service for overflying aircraft [59]

Search and rescue base

RAF Manston was home to a helicopter search and rescue (SAR) flight from No. 22 Squadron RAF from 1961, operating Westland Whirlwind HAR.2/HAR.10 aircraft. The flight was withdrawn in 1969, but an outcry led to the RAF contracting Bristow Helicopters from 1971 to 1974 to provide a continuing service (using Whirlwind Series 3s). In 1972, the Bristow crew was awarded the Wreck Shield for Most Meritorious Rescue in 1972 by the Department of Trade and Industry. [60]

The RAF returned in 1974, with No. 72 Squadron RAF operating two Westland Wessex HC.2 aircraft to replace the Bristow operation. The flight was transferred back to No. 22 Squadron in June 1976. In 1988 No. 202 Squadron RAF moved to Manston with its Westland Sea King HAR.3, when the Wessex helicopters moved to RAF Coltishall. The Sea Kings remained at Manston until July 1994, when the SAR base closed, transferring SAR English Channel coverage to RAF Wattisham. $^{[60][61]}$

It was announced that Manston would be a location for the new 10-year SAR contract, operated by <u>Bristow Helicopters</u> on behalf of the <u>Maritime and Coastguard Agency</u>. [62][63] Manston was intended to have a new £7 million, custom built facility operational from April 2015, [64] hosting two new <u>AgustaWestland AW189</u> helicopters. [65] These plans were cancelled after the airport's closure was announced [66]



A Sea King HAR.3 of 202 RAF Squadron, who operated this type of aircraft from RAF Manston between 1988 and 1994

Constraints

Manston's flight path passed over the town of Ramsgate, a seaside resort of some 40,000 residents, situated about 1 km (0.62 mi) from the eastern end of the runway. To one side of the runway lies the village of Cliffsend, whose housing is less than 200 m (660 ft) from it. Manston village stands to the north-east of the passenger terminal.

Accidents and incidents

On 11 August 2010 a <u>Douglas DC-8-63F</u> YA-VIC of <u>Kam Air</u> suffered a <u>tailstrike</u> on take-off, destroying an approach light. [67] The aircraft was operating an international cargo flight from Manston to <u>Buenos Aires</u> via the <u>Cape Verde Islands</u>. The incident was caused by excess fuel, and an underestimation of the mass of the cargo, making the aircraft 25,700 pounds (11,700 kg) overweight. After being informed of the tailstrike, the crew continued the flight to the Cape Verde Islands. Inspection on arrival revealed that a tailstrike had indeed occurred, although the tailstrike indicator was within limits.

The incident was investigated by the <u>Air Accidents Investigation Branch</u>, which made four safety recommendations. As a direct result, Kam Air was <u>banned</u> from operating within the European Union. The three crew were dismissed, and Kam Air announced that it would withdraw its two DC-8s from service. [68]

In popular culture

The airport and runway featured in the James Bond film Die Another Day in 2001, when the airport was used to portray a North Korean airbase. [69]

See also

- Defence Fire Training and Development Centre
- List of Royal Air Force stations
- United States Air Force in the United Kingdom
- United States Air Forces in Europe

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SE-005



Futura's problems blamed for UK tour firm's collapse

2013-09-13 00:00:00

By Humphrey Carter

PALMA

THE fallout from the Balearic airline crisis is starting to be felt overseas and yesterday a British budget holiday company with thousands of tourists currently in the Mediterranean, including here in Majorca, went bust blaming the Palmabased airline Futura which grounded its planes on Monday and launched insolvency proceedings.

Seguro Holidays, founded in Kent in 1991, operates out of Prestwick Airport in Glasgow and Kent International Airport at Manston, near Ramsgate Kent but with 80 percent of its flights operated by Futura, the company went into administration yesterday morning blaming Futura's problems.

Over 2'000 people are currently on holiday with Seguro and more than 17'000 had booked to travel with them between now and the end of summer next year.

However, for those stranded her in Majorca there is no need for concern

The tour firm is ATOI and ABTA recognised and therefore Civil Aviation is now responsible for getting stranded holiday makers home. Their next flight back to Manston, for example, was due to have been tomorrow.

In a statement released by Seguro Holidays, directors Rachel Elliott and Richard Bruke said "Futura's collapse was totally unexpected as an airline with over 230 planes, having a good reputation and being one of Spain's respected airlines. "We offer our sincere apologies and are very sad to have had to make this decision, but we were left with no alternative." "Clients in resorts will remain in their accommodation until alternative return flights are sourced, and those who have already booked a future holiday, their money is protected, and they will be able to claim back through the CAA or their credit card companies." A statement issued by Futura said difficulties in the airline sector, including "the excessive and speculative increase of fuel" had put it "in a very difficult situation from the financial point of view".

The statement said: "Not presenting this request for insolvency proceedings would make complying with our payment obligations with the suppliers impossible."

AIRLINE TALKS

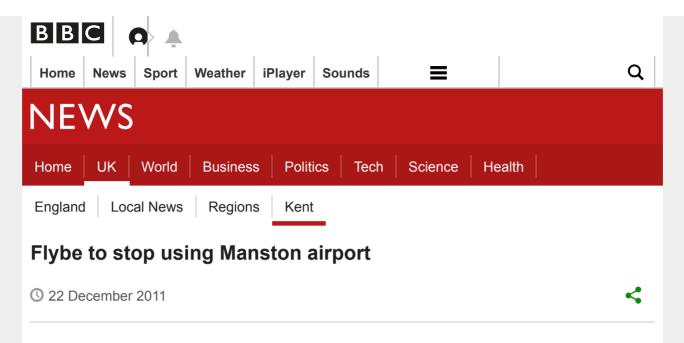
Yesterday, Spanair and Futura continued trying to resolve their futures and the Balearic government announced that it will be setting up an airline crisis committee as quickly as possible to monitor the situation and discuss possible

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SE-006



Flybe has said it will not be flying from Manston International Airport in Kent after March.

The airline said it would cease operations there at the end of the winter season.

Flybe spokesman Niall Duffy said: "We tried different routes and the numbers simply weren't there. It's impossible to sustain routes without the passengers."

Flybe launched its Manston to Edinburgh service in May 2010.

Mr Duffy said: "Unfortunately for the Manston services it was just impossible to look at those passenger numbers and think that we could sustain the kind of difficulties we were facing.

"It is fair to say that Manston is one of the airports with the smaller catchment areas in the United Kingdom, and you have Gatwick not too far away."

The airline said passengers booked on flights after March would be contacted by Flybe and offered a full refund or tickets on alternative flights.

SE-007



KLM To Launch Flights From Manston.

6, February 2013 / in News / by Paul

KLM is to begin a new service from Manston Airport in eastern Kent to Amsterdam Schiphol on the 2nd April.

The Dutch carrier will offer twice daily flights from Manston to Schiphol, from where passengers can then connect to over 150 destinations worldwide. KLM will operate Fokker 70 jets with capacity for up to 80 passengers on the new route. The aircraft will feature both business class and economy.

KLM now offers 17 departure airports in Great Britain from where pasengers can connect, via Amsterdam Schiphol, to the airline's worldwide route network. The airports are: Aberdeen, Birmingham, Bristol, Cardiff, Durham Tees Valley, Edinburgh, Glasgow, Humberside, Inverness, Leeds, London (Heathrow & City), Manchester, Newcastle, Norwich, Southampton and now Manston in Kent. Quite a list!

Tags: Aberdeen, Amsterdam Schiphol, Birmingham, Bristol, Cardiff, Durham Tees Valley, Kent, KLM, Manston Airport

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Manston Airport: KLM airline 'will not return'

8 April 2014 **f** 📀 💆 **T** < Share

KLM's last flight will leave Manston on Wednesday morning

Dutch airline KLM will not return to an airport threatened by closure even if a buyer is found, it has confirmed.

Up to 150 mostly part-time jobs were put at risk last month when loss-making Manston Airport in Kent revealed it was in talks over a possible closure.

KLM, which began operating twice-daily return flights to Amsterdam last April, then announced it would axe its Cityhopper flights from 10 April.

The last flight will be at 10:30 BST on Wednesday.

KLM Cityhopper managing director, Boet Kreiken, told <u>Air Transport World</u> that it was impossible to do "business in a shaky environment".

"Now it is game over; we will redeploy the aircraft. We are gone.

"We can't flip-flop in and out all the time. That is not the way we work."

'No offers'

Manston Airport was bought by the co-founder of the Stagecoach Group, Ann Gloag, for £1 from the New Zealand company Infratil in October.

Since then it is understood the airport has been losing about £10,000 a day.

A 45-day consultation on its possible closure is due to end on 11 May.

An initial offer for the airport from an unnamed buyer was withdrawn without explanation last week.

On Tuesday, the owners told the BBC there were "no offers on the table".

The airport has said it will remain operational until at least the end of April and staff would be given 10 days notice of closure thereafter.

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Introduction

This report examines the volume and value of tourism and the impact of visitor expenditure on the local economy in 2017 and provides comparative data against the previously published data for Kent (2015).

Destination Research was commissioned by Visit Kent to produce 2017 results based on the latest data from national tourism surveys and regionally/locally based data. The results are derived using the Cambridge Economic Impact Model.

In its basic form, the model distributes regional activity as measured in national surveys to local areas using 'drivers' such as the accommodation stock and occupancy which influence the distribution of tourism activity at local level. Whenever possible, results have been enhanced by building in additional local-level data gathered by the district (e.g. local attractions data, boat moorings, language schools in the area, accommodation stock, etc.). See Appendix I for further details.

Contextual analysis

Domestic tourism

In 2017, British residents took 100.6 million overnight trips in England, totalling 299 million nights away from home, with an expenditure of £19.05 billion. £189.31 was spent per trip, and with an average trip length of 2.97 nights, the average spend per night was £63.62. The number of domestic trips was 2% up on 2015, and the amount spent was also up by 2%.

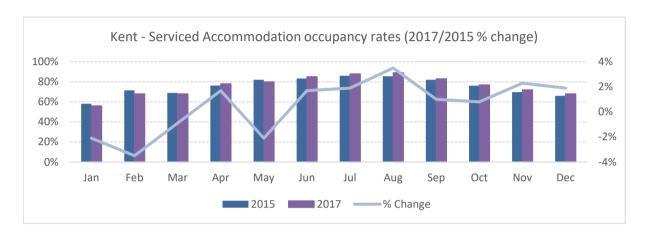
The South East region experienced a 1% increase in overnight trips between 2015 and 2017. Bednights were up 2% on 2015 and expenditure was up by 3%. The region received slightly more visitors in 2017 than in 2015 and visitors spent slightly more per night than in 2015. The average spend per night was up from £56.53 per night in 2015 to £59.01 in 2017.

Domestic visits to Kent

The domestic tourism results for Kent used in this model combine a mixture of supply and demand data. We do this because extracting county level data from national surveys can sometimes lead to inaccurate results due to low sample sizes. According to the GB Tourism Survey (demand side), Kent experienced a 1% decrease in the volume of trips between 2015 and 2017. Nights were down 2% and expenditure was also down by 1%.

In 2017, serviced accommodation providers saw an average occupancy of 76%, compared to the 75.5% witnessed in 2015, an increase of 0.5%. By combining the supply and demand results we estimate that trips to Kent were down by a marginal rate of 0.3%, nights per trip were up by 1.9% and expenditure increased by 2.9%.

Please note that the Cambridge Model uses three year rolling averages to reduce some of the more extreme fluctuations which are due to small sample sizes and high margins or error.



Visits from overseas

As with domestic tourism, the Cambridge Model uses three year averages to estimate changes in overseas tourism to reduce some of the more extreme fluctuations which can be attributed to small sample sizes and high margins or error. At national level, the number of visits in 2017 grew by 10% reaching 33 million. The number of visitor nights spent in the UK increased by 7% between 2015 and 2017 to reach 245.7 million, with the average number of nights per visit standing at 7.4.

Overseas trips to the South England region were 9% up on 2015 to reach 5.2 million overnight trips. The total number of nights was up by 8% to reach 37.4 million in 2017. Spend was unchanged from the levels achieved in 2015.

Kent also experienced growth between 2015 and 2017. Trips were up 4%, nights per trip went up 11% and expenditure was also up by 4%.

The International Passenger Survey (IPS) is conducted by Office for National Statistics and is based on face- to-face interviews with a sample of passengers travelling via the principal airports, sea routes and the Channel Tunnel, together with visitors crossing the land border into Northern Ireland. The number of interviews conducted in England in 2017 was around 35,628.

Day visitors

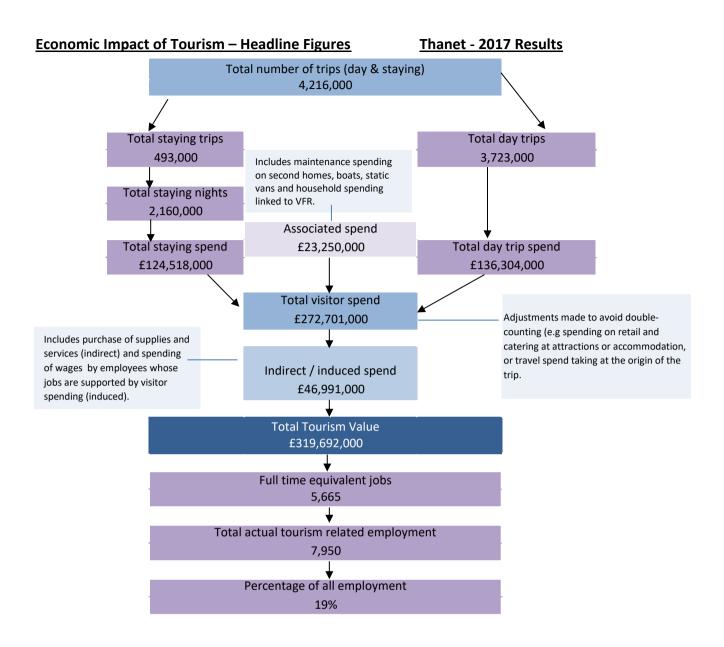
During 2017, GB residents took a total of 1.5 billion tourism day trip to destinations in England. Around £51 billion was spent during these trips. At national level, the volume of day trips was down by 1% and the expenditure levels were unchanged between 2015 and 2017.

The volume and value of tourism day visits in the South East of England increased by 4% between 2015 and 2017, from 221 million to 230 million. Expenditure levels were up by 5% to £7.4 billion in 2017.

The results for Kent are based on a combination of results from the GB Day Visitor Survey, admissions data from the Visits to Visitor Attractions Survey, the ALVA (Association of Leading Visitor Attractions) Survey and attractions visitor numbers from the Visit Kent Business Barometer.

The GB Day Visitor Survey shows a 15% increase in volume of trips to Kent between 2015 and 2017 and a 20% increase in value for the same period. However, data from the Visits to Visitor Attractions Survey looking at attractions based in Kent shows that the admissions to attractions were up by 5% between 2015 and 2017 and admission charges were also up by 5%. Results from the Visit Kent Business Barometer report an increase of 4% in visitor numbers for the same period.

Based on these results the model assumes that the volume of day trips was up 8% between 2015 and 2017 and expenditure up by 9%.



Economic Impact	of Tourism - Year on	year comparisons
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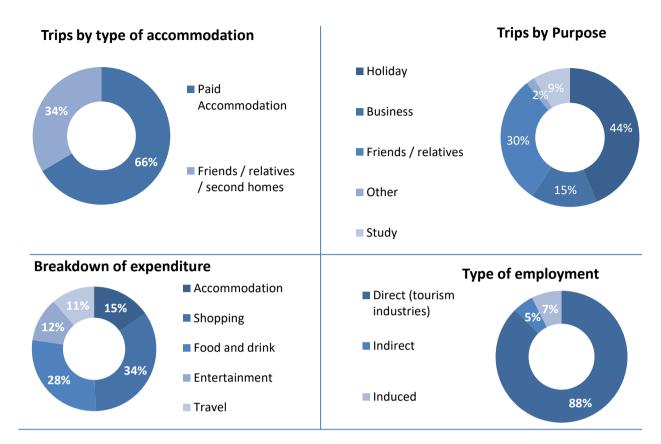
Thanet

	,		
Day Trips	2015	2017	Annual variation
Day trips Volume	3,386,900	3,723,000	9.9%
Day trips Value	£119,391,494	£136,304,000	14.2%
Overnight trips			
Number of trips	494,000	493,000	-0.2%
Number of nights	2,059,000	2,160,000	4.9%
Trip value	£122,087,000	£124,518,000	2.0%
Total Value	£292,877,400	£319,692,000	9.2%
Actual Jobs	7,312	7,950	8.7%

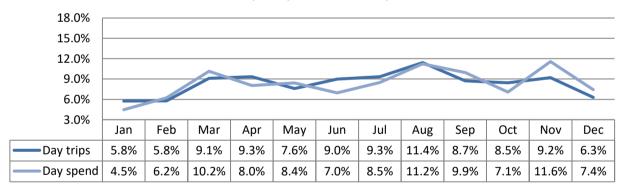
Thanet	2015		2017	Variation	
Average length stay (nights x trip)		4.17		4.38	5.1%
Spend x overnight trip	£	247.14	£	252.57	2.2%
Spend x night	£	59.29	£	57.65	-2.8%
Spend x day trip	£	35.25	£	36.61	3.9%

Economic Impact of Tourism – Headline Figures

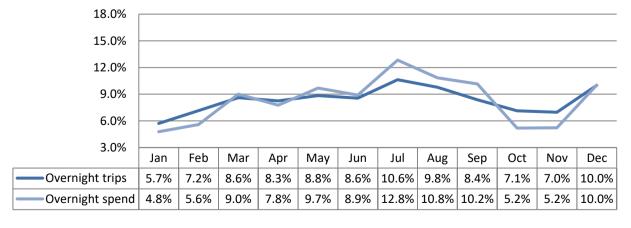
Thanet - 2017 Results



Seasonality - Day visitors (County level)



Seasonality - Overnight visitors (County level)



Volume of Tourism

Staying visits in the county context

Thanet - 2017 Results

Staying trips in the county context	Domestic trips ('000)	Overseas trips ('000)
Ashford	281	110
Canterbury	461	186
Dartford	135	46
Dover	336	86
Gravesham	149	40
Maidstone	288	83
Medway	423	101
Sevenoaks	168	63
Folkestone & Hythe	395	75
Swale	355	43
Thanet	345	148
Tonbridge&Malling	193	49
Tunbridge Wells	246	65
Kent	3,775	1,095

Staying nights in the county context	Domestic nights ('000)	Overseas nights ('000)
Ashford	753	504
Canterbury	1,411	1,322
Dartford	386	239
Dover	952	487
Gravesham	389	243
Maidstone	746	525
Medway	1,251	686
Sevenoaks	434	353
Folkestone & Hythe	991	434
Swale	1,244	324
Thanet	1,040	1,120
Tonbridge&Malling	553	300
Tunbridge Wells	748	446
Kent	10,898	6,983

Expenditure in the county context	Domestic spend (millions)	Overseas spend (millions)
Ashford	£44	£29
Canterbury	£76	£73
Dartford	£19	£12
Dover	£63	£26
Gravesham	£16	£10
Maidstone	£38	£28
Medway	£60	£30
Sevenoaks	£23	£18
Folkestone & Hythe	£62	£20
Swale	£45	£12
Thanet	£54	£70
Tonbridge&Malling	£26	£13
Tunbridge Wells	£41	£21
Kent	£568	£361

Staying Visitors - Accommodation Type

Thanet - 2017 Results

Trips by Accommodation

		UK		Overseas		Total	
Serviced		132,000	38%	73,000	50%	205,000	42%
Self catering		16,000	5%	11,000	7%	27,000	5%
Camping		23,000	7%	5,000	4%	28,000	6%
Static caravans		35,000	10%	0	0%	35,000	7%
Group/campus		2,000	1%	9,000	6%	11,000	2%
Paying guest		0	0%	0	0%	0	0%
Second homes		8,000	2%	1,000	1%	9,000	2%
Boat moorings		6,000	2%	0	0%	6,000	1%
Other		3,000	1%	12,000	8%	15,000	3%
Friends & relative	S	120,000	34%	36,000	24%	156,000	32%
Total	2017	345,000		148,000		493,000	
Comparison	2015	351,000		143,000		494,000	
Difference		-2%		3%		0%	

Nights by Accommodation

		UK		Overseas		Total	
Serviced		302,000	29%	328,000	29%	630,000	29%
Self catering		85,000	8%	86,000	8%	171,000	8%
Camping		86,000	8%	44,000	4%	130,000	6%
Static caravans		156,000	15%	0	0%	156,000	7%
Group/campus		8,000	1%	84,000	8%	92,000	4%
Paying guest		0	0%	0	0%	0	0%
Second homes		27,000	3%	2,000	0%	29,000	1%
Boat moorings		28,000	3%	0	0%	28,000	1%
Other		9,000	1%	37,000	3%	46,000	2%
Friends & relativ	es	339,000	33%	539,000	48%	878,000	42%
Total	2017	1,040,000		1,120,000		2,160,000	
Comparison	2015	993,000		1,066,000		2,059,000	
Difference		5%		5%		5%	

Spend by Accommodation Type

		UK		Overseas		Total	
Serviced		£31,328,000	58%	£39,229,000	56%	£70,557,000	57%
Self catering		£4,356,000	8%	£3,563,000	5%	£7,919,000	6%
Camping		£2,191,000	4%	£1,947,000	3%	£4,138,000	3%
Static caravans		£4,097,000	8%	£0	0%	£4,097,000	3%
Group/campus		£82,000	0%	£5,012,000	7%	£5,094,000	4%
Paying guest		£0	0%	£0	0%	£0	0%
Second homes		£483,000	1%	£98,000	0%	£581,000	0%
Boat moorings		£500,000	1%	£0	0%	£500,000	0%
Other		£497,000	1%	£749,000	1%	£1,246,000	1%
Friends & relativ	/es	£10,588,000	19%	£19,798,000	28%	£30,386,000	25%
Total	2017	£54,122,000		£70,396,000		£124,518,000	
Comparison	2015	£54,237,000		£67,850,000		£122,087,000	
Difference		0%		4%		2%	

Serviced accommodation includes hotels, guesthouses, inns, B&B and serviced farmhouse accommodation. Paying guest refers to overseas visitors staying in private houses, primarily language school students. Other trips includes nights spent in transit, in lorry cabs and other temporary accommodation.

Trips by Purpose

		UK	UK		UK Overseas		seas	Total	
Holiday		167,000	48%	47,000	32%	214,000	44%		
Business		48,000	14%	28,000	18%	76,000	15%		
Friends & relati	ves	124,000	36%	26,000	18%	150,000	30%		
Other		6,000	2%	4,000	3%	10,000	2%		
Study		0	0%	43,000	29%	43,000	9%		
Total	2017	345,000		148,000		493,000			
Comparison	2015	351,000		143,000		494,000			
Difference		-2%		3%		0%			

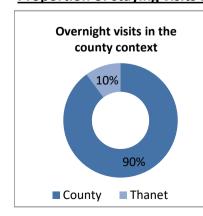
Nights by Purpose

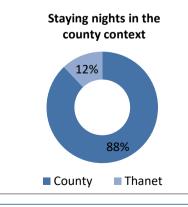
		UK		Overseas		Total	
Holiday		601,000	58%	244,000	22%	845,000	39%
Business		164,000	16%	72,000	6%	236,000	11%
Friends & relat	ives	258,000	25%	226,000	20%	484,000	23%
Other		17,000	2%	27,000	2%	44,000	2%
Study		0	0%	551,000	49%	551,000	26%
Total	2017	1,040,000		1,120,000		2,160,000	
Comparison	2015	993,000		1,066,000		2,059,000	
Difference		5%		5%		5%	

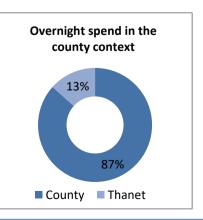
Spend by Purpose

		UK		Overseas		Total	
Holiday		£28,143,000	52%	£17,211,000	25%	£45,354,000	36%
Business		£16,237,000	30%	£5,040,000	7%	£21,277,000	17%
Friends & relati	ives	£9,201,000	17%	£6,953,000	10%	£16,154,000	13%
Other		£541,000	1%	£2,265,000	3%	£2,806,000	2%
Study		£0	0%	£38,927,000	55%	£38,927,000	31%
Total	2017	£54,122,000		£70,396,000		£124,518,000	
Comparison	2015	£54,237,000		£67,850,000		£122,087,000	
Difference		0%		4%		2%	

Proportion of staying visits in the county context





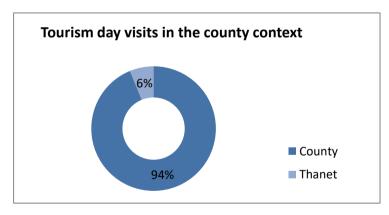


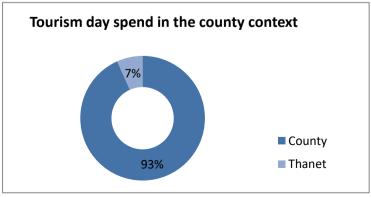
Total Volume and Value of Day Trips

		Trips	Spend
Total	2017	3,723,000	£136,304,000
Comparison	2015	3,386,900	£119,391,494
Difference		10%	14%

Day Visitors in the county context

District	Day Visits (millions)	Day Visit Spend (millions)
Ashford	4.0	£141.4
Canterbury	7.1	£238.1
Dartford	10.6	£404.7
Dover	4.2	£127.0
Gravesham	1.8	£52.6
Maidstone	4.1	£135.7
Medway	4.4	£144.5
Sevenoaks	4.0	£140.4
Folkestone & Hythe	4.3	£127.7
Swale	4.7	£141.4
Thanet	3.7	£136.3
Tonbridge&Malling	2.8	£89.6
Tunbridge Wells	4.3	£157.4
Kent	60.1	£2,036.7





Value of Tourism

Expenditure Associated with Trips

Thanet - 2017 Results

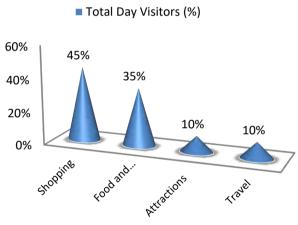
Direct Expenditure Associated with Trips

		Accomm.	Shopping	Food and Drink	Attractions	Travel	Total
UK Tourists		£19,829,000	£6,641,000	£11,715,000	£5,464,000	£10,473,000	£54,122,000
Overseas touris	sts	£20,192,000	£21,381,000	£12,294,000	£11,257,000	£5,271,000	£70,396,000
Total Staying		£40,021,000	£28,022,000	£24,009,000	£16,721,000	£15,744,000	£124,518,000
Total Staying (9	%)	32%	23%	19%	13%	13%	100%
Total Day Visitors		£0	£61,473,000	£47,979,000	£13,221,000	£13,640,000	£136,304,000
Total Day Visite	ors (%)	0%	45%	35%	10%	10%	100%
Total	2017	£40,021,000	£89,495,000	£71,988,000	£29,942,000	£29,384,000	£260,831,000
%		15%	34%	28%	11%	11%	100%
Comparison	2015	£39,622,000	£81,071,000	£65,272,000	£28,160,000	£27,353,000	£241,478,000
Difference		1%	10%	10%	6%	7%	8%

Breakdown of expenditure

60% 40%

Breakdown of expenditure



■ Total Staying (%) 40% 32% 30% 23% 19% 20% 13% 13% 10% 0% in. Shopping and Drink Retractions France

Other expenditure associated with tourism activity

Other expenditure associated with tourism activity - Estimated spend							
Second homes Boats Static vans Friends & relatives Total							
£912,000	£1,200,000	£210,000	£20,928,000	£23,250,000			

Spend on second homes is assumed to be an average of £2,000 on rates, maintenance, and replacement of furniture and fittings. Spend on boats assumed to be an average of £2,000 on berthing charges, servicing and maintenance and upgrading of equipment. Static van spend arises in the case of vans purchased by the owner and used as a second home. Expenditure is incurred in site fees, utility charges and other spending and is estimated at £2,000. Additional spending is incurred by friends and relatives as a result of people coming to stay with them. A cost of £175 per visit has been assumed based on national research for social and personal visits.

Thanet - 2017 Results

Business turnover arises as a result of tourist spending, from the purchase of supplies and services locally by businesses in receipt of visitor spending and as a result of the spending of wages in businesses by employees whose jobs are directly or indirectly supported by tourism spending.

		Staying Visitor	Day Visitors	Total
Accommodation	on	£40,636,000	£960,000	£41,596,000
Retail		£27,801,000	£60,858,000	£88,659,000
Catering		£23,359,000	£46,540,000	£69,899,000
Attractions		£17,313,000	£14,316,000	£31,629,000
Transport		£9,490,000	£8,178,000	£17,668,000
Non-trip spend	t	£23,250,000	£0	£23,250,000
Total Direct	2017	£141,849,000	£130,852,000	£272,701,000
Comparison	2015	£135,189,000	£114,616,000	£249,805,400
Difference		5%	14%	9%

Adjustments have been made to recognise that some spending on retail and food and drink will fall within attractions or accommodation establishments. It is assumed that 40% of travel spend will take place at the origin of the trip rather than at the destination.

Supplier and Income Induced Turnover

		Staying Visitor	Day Visitors	Total
Indirect spen	d	£8,590,000	£7,102,000	£15,692,000
Non trip spending		£3,488,000	£3,488,000 £0	
Income induced		£15,415,000	£12,396,000	£27,811,000
Total	2017	£27,493,000	£19,498,000	£46,991,000
Comparison	2015	£25,993,000	£17,079,000	£43,072,000
Difference		6%	14%	9%

Income induced spending arises from expenditure by employees whose jobs are supported by tourism spend.

Total Local Business Turnover Supported by Tourism Activity – Value of Tourism

		Staying Visitor	Day Visitors	Total
Direct		£141,849,000	£130,852,000	£272,701,000
Indirect		£27,493,000	£19,498,000	£46,991,000
Total Value	2017	£169,342,000	£150,350,000	£319,692,000
Comparison	2015	£161,182,400	£131,695,000	£292,877,400
Difference		5%	14%	9%

Employment

The model generates estimates of full time equivalent jobs based on visitor spending. The total number of 'actual' jobs will be higher when part time and seasonal working is taken into account. Conversion of full time equivalent jobs into actual jobs relies on information from business surveys in the sectors receiving visitor spending. A new Full Time Equivalent tourism job is created with every £54,000 increase in tourism revenue.

Direct employment

	Full time equivalent (FTE)							
		Staying '	Visitor	Day Visitor		Total		
Accommodat	ion	949	36%	22	1%	972	20%	
Retailing		367	14%	804	37%	1,171	25%	
Catering		517	20%	1,031	48%	1,548	32%	
Entertainment		256	10%	212	10%	468	10%	
Transport		110	4%	95	4%	205	4%	
Non-trip spen	ıd	431	16%	0	0%	431	9%	
Total FTE	2017	2,631		2,164		4,795		
Comparison	2015	2,509		1,895		4,405		
Difference		5%		14%		9%		

Estimated actual jobs							
	Staying	Staying Visitor		isitor	Total		
Accommodation	1,405	37%	33	1%	1,438	21%	
Retailing	551	15%	1,206	38%	1,757	25%	
Catering	776	21%	1,546	48%	2,322	33%	
Entertainment	361	10%	299	9%	660	9%	
Transport	155	4%	134	4%	289	4%	
Non-trip spend	491	13%	0	0%	491	7%	
Total Actual 2017	3,740		3,218		6,957		
Comparison 2015	3,584		2,819		6,403		
Difference	4%		14%		9%		

Indirect & Induced Employment

Full time equivalent (FTE)								
	Staying Visitor		Day Visitors	Total				
Indirect jobs		224	132	355				
Induced jobs		285	230	515				
Total FTE	2017	509	361	870				
Comparison	2015	481	316	798				
Difference		6%	14%	9%				

Estimated actual jobs						
		Staying Visitor	Day Visitors	Total		
Indirect jobs		255	150	405		
Induced jobs		325	262	587		
Total Actual	2017	580	412	992		
Comparison	2015	549	361	909		
Difference		6%	14%	9%		

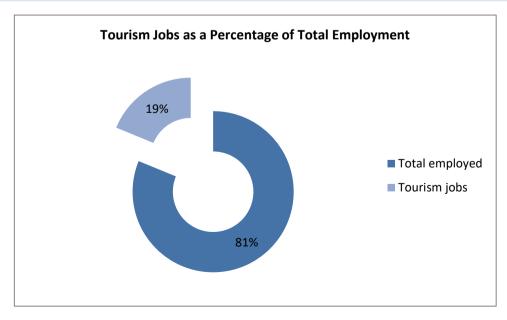
Actual jobs are estimated from surveys of relevant businesses at locations in England and take account of part time and seasonal working.

Full time equivalent (FTE)							
		Staying Visitor		Day Visitor		Total	
Direct		2,631	84%	2,164	86%	4,795	85%
Indirect		224	7%	132	5%	355	6%
Induced		285	9%	230	9%	515	9%
Total FTE	2017	3,140		2,525		5,665	
Comparison	2015	2,990		2,212		5,202	
Difference		5%		14%		9%	

Estimated actual jobs							
		Staying Visitor		Day Visitor		Total	
Direct		3,740	87%	3,218	89%	6,957	88%
Indirect		255	6%	150	4%	405	5%
Induced		325	7%	262	7%	587	7%
Total Actual	2017	4,320		3,630		7,950	
Comparison	2015	4,133		3,179		7,312	
Difference		5%		14%		9%	

Tourism Jobs as a Percentage of Total Employment

	Staying Visitor	Day visitors	Total
Total employed	42,300	42,300	42,300
Tourism jobs	4,320	3,630	7,950
Proportion all jobs	10%	9%	19%
Comparison 2015	4,133	3,179	7,312
Difference	5%	14%	9%



The key 2017 results of the Economic Impact Assessment are:

- **4.2** million trips were undertaken in the area
- 3.7 million day trips
- **0.5** million overnight visits
- **2.2 million** nights in the area as a result of overnight trips
- £273 million spent by tourists during their visit to the area
- £23 million spent on average in the local economy each month.
- £125 million generated by overnight visits
- £136 million generated from day trips.
- £320 million spent in the local area as result of tourism, taking into account multiplier effects.
- **7,950 jobs** supported, both for local residents from those living nearby.
- **6,957 tourism jobs** directly supported
 - 992 non-tourism related jobs supported linked to multiplier spend from tourism.

Appendix I - Introduction about Cambridge Model

This report examines the volume and value of tourism and the impact of that expenditure on the local economy. The figures were derived using the Cambridge Economic Impact Model and the research was undertaken by Destination Research.

The model utilises information from national tourism surveys and regionally based data held by Destination Research. It distributes regional activity as measured in those surveys to local areas using 'drivers' such as the accommodation stock and occupancy which influence the distribution of tourism activity at local level.

Limitations of the Model

The methodology and accuracy of the above sources vary. The results of the model should therefore be regarded as estimates which are indicative of the scale and importance of visitor activity in the local area. It is important to note that in the national tourism surveys the sample sizes for each area changes year on year. This is as a result of the random probability nature of the methodology. As such, the results of the Cambridge Model are best viewed as a snapshot in time and we would caution against year-on-year comparisons.

It should be noted that the model cannot take into account any leakage of expenditure from tourists taking day trips out of the area in which they are staying. While it is assumed that these may broadly balance each other in many areas, in locations receiving significant numbers of day visitors from London, there is likely to be an underestimate in relation to the number of overseas day visitors staying in holiday accommodation in London.

Whilst it is important to be aware of these issues, we are confident that the estimates we have produced are as reliable as is practically possible within the constraints of the information available.

Rounding

All figures used in this report have been rounded. Therefore, in some tables there may be a slight discrepancy between totals and sub totals.

Data sources

The main national surveys used as data sources in stage one include:

- Great Britain Tourism Survey (GBTS) information on tourism activity by GB residents;
- International Passenger Survey (IPS) information on overseas visitors to the United Kingdom;
- Day Visits in the annual Great Britain Day Visitor Survey using information on visits lasting more than 3 hours and taken on an irregular basis

These surveys provide information down to a regional level. In order to disaggregate data to a local level the following information sources are used:

- Records of known local accommodation stock held by Destination Research;
- VisitEngland's surveys of Visits to Attractions, which provide data on the number of visitors to individual tourist attractions;
- Mid- 2017 estimates of resident population as based on the 2011 Census of Population;
- Selected data from the 2011 Census of Employment;
- Selected data on the countryside and coast including, national designations and length of the coastline.

Staying Visitors

The GBTS provides information on the total number of trips to the region and the relative proportions using different types of accommodation. By matching these figures to the supply of such accommodation, the regional average number of trips per bedspace or unit of accommodation can be derived. The IPS provides information on the total number of trips by overseas visitors to the region. The model uses three year rolling averages to reduce extreme highs and lows which are due to small sample sizes, rather than being a reflection on drastic changes in demand year-on-year.

Day Visitors

Information on day trips at the regional level is available from the Day Visits in Great Britain survey. The survey includes all leisure-related trips from home. It should be noted that a large proportion are local trips made by people resident in the locality. The model uses information from the survey to estimate the number of longer day trips (defined as those lasting at least 3 hours and involving travel of more than 20 miles) and irregular trips lasting more than 3 hours.

Impact of tourism expenditure

This section examines the impact of the tourism expenditure in terms of the direct, indirect and induced expenditure as well as an estimate of the actual jobs (both direct and indirect) supported by tourism expenditure in the district.

The GBTS, IPS and Day Visits to Great Britain survey data on the breakdown of visitor spending. The impact of this initial round of expenditure will be subsequently increased by multiplier effects. These arise from the purchase of supplies and services by the businesses in receipt of visitor expenditure (indirect impacts), and by the income induced-effects arising from the spending of wages by employees in the first round of business and in subsequent expenditure in supplier business (induced impacts).

The New Earnings Survey which provides information on wage levels by industry sector and region; An internal business database which includes data on the structure of business expenditure, local linkages and multiplier ratios drawn from a wide range of business and economic studies carried out by Geoff Broom Associates, PA Cambridge Economic Consultants and others. By applying the breakdown to the estimates of visitor spending, the model generates estimates of total direct spending.

Evidence from national studies suggests that some minor adjustments are required to match visitor spend to business turnover – for example, some expenditure on food and drink actually takes place in inns and hotels that fall in the accommodation sector and within attractions. More significantly, expenditure on travel costs associated with individual trips is equally likely to take place at the origin of the trip as the destination. Therefore the model assumes that only 40% of travel expenditure accrues to the destination area.

Number of full time job equivalents

Having identified the value of turnover generated by visitor spending, it is possible to estimate the employment associated with that spending. Wages for staff and drawings for the proprietors will absorb a proportion of that turnover. By applying these proportions to the overall additional turnover in each sector, the amount of money absorbed by employment costs can be calculated. The New Earnings Survey provides data from which the average costs by business sector, adjusted to take account of regional differences, can be calculated.

After allowing for additional costs such as National Insurance and pension costs, an average employment cost per full time equivalent job can be estimated. The number of such jobs in the local area can then be estimated by dividing the amount of business expenditure on wages and drawings by the average employment cost per job.

Number of Actual Jobs

The model generates estimates of full time equivalent jobs based on visitor spending. However, the total number of actual jobs will be higher when part time and seasonal working is taken into account. The full time equivalent jobs arising directly from visitor spending are converted into actual jobs using information from business surveys in the sectors receiving visitor spending (principally accommodation, food and drink, retail, attractions, transport). In general, the conversion factor between full time equivalent jobs and actual jobs varies around 1.5 in those sectors.

The indirect and induced jobs arise across a much wider range of employment sectors. Therefore, the average 1.16 for all sectors based on Census of Employment data has been used to convert full time equivalent jobs in this sector to actual jobs.

The employment estimates generated by the model include both self-employed and employed people supported by visitor expenditure. The model also includes an estimate of the additional jobs arising in the attractions sector, which are not related to visitor expenditure. However, the numbers do not include other tourism-related employment such as jobs in local authorities arising from their tourism functions, e.g. tourist information staff, additional public health, parks and gardens, public conveniences, maintenance sections and jobs arising from capital investment in tourism facilities.

Local level data for Kent EIA Reports 2017

The Cambridge Model allows for the use of local visitor related data. Local data from visitor survey and other sources is not always sufficiently detailed or available regularly enough to make the results consistent. We rely on partners to collect additional locally source data to feed into the model. We have also used data from Visit Kent's Business Barometer. The following local data has been included in the 2017 Kent results:

<u>Dartford - Bluewater Shopping Centre</u> - Bluewater attracted 28 million visitors in 2017. Only about a quarter of these visits is accounted for in the Cambridge Model, equating to about 7.8 million visits.

<u>Dover District</u> - Cruise Passengers data - Port of Dover received about 225,000 cruise passengers in 2017. Official statistics (DfT) suggest that about half of all passengers to Dover would be 'port calls' visits. Furthermore, cruise passengers are included at both departure and arrival if their journey begins and ends at a UK seaport. We made the following assumptions:

A total of 112,000 cruise passengers were classed as 'port call' visits and have been counted as day visitors. For the additional estimated 112,000 that departed or finished their trip in Dover we assume that most would start and finish their trip at Dover. A multiplier factor of 0.6 has been applied to avoid double counting and the additional trips have been added as extra serviced accommodation trips (67,500).

<u>Tonbridge & Malling</u> - Tonbridge Castle visitor numbers have rebounded recently, following a drop in performance between 2014-2016. The latest admission figures have been included in the district results.

Other anecdotal information taken into consideration was the significant growth in high-end independent cafes and restaurants in Tonbridge since 2016, now making it quite a foody destination (includes Tonbridge Old Fire Station, Beyond the Grounds, Basil, Havet, Saltwaters, Verdigris, Fuggles and Paws Cat Café). Outside of Tonbridge, Aylesford Priory attracts hundreds of thousands of visitors each year. The latest admission figures have been included in the district results.

Folkestone & Hythe District Council (previously Shepway District)

The latest admission figures for Romney Marsh Visitor Centre have been included in the district results. Folkestone Triennial 2017 - During September and October 2017 the Triennial attracted record high visitor numbers. The latest admission figures have been included in the district results.

Ashford

Annual footfall figures for the Big Cat Sanctuary in Smarden have been included. Car park data shows that Ashford carparks saw a 2% drop in users and Tenterden a 1% drop.

Medway

Increase in the number of festivals and events (Sweeps Festival, Dickens Summer Festival, Rochester Castle concerts, Medieval Merriment, Dickensian Christmas Festival, 'The Battle of Medway' (two weeks in June 2017) with additional 200 Dutch yachts and many visitors to the two week series of events. Coach visits (2017) 22,047 coaches and assumed 114,608 visitors (assumes x54 pax per coach).

Swale

We have used selected information from the Destination Intelligence reports submitted as part of their British Destination membership and the data sharing and benchmarking research.

Thanet

Thanet Language Schools – Figures for 2017 compared to 2015 show an 11% increase in volume. Southeastern - Comparison stats for 2015 and 2017 - For travel to Margate, Broadstairs and Ramsgate only, journeys on Off-Peak products increased by 33% from April 2016 to March 2017 compared to the previous year.

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So, in the case of Torbay, sea defences, promenades and drainage systems are all in need of significant repairs and much of the accommodation is similarly in need of repair. It is understood that other authorities will also be making similar points.

- 13. Similarly the traditional industries which sustained these towns, namely tourism and marine related industries, have seen declines due to the changing nature of holidays, with a direct correlation between the increase in cheap package holiday flights abroad and the decline in "at home" holidays. Similarly the old industries of fishing and marine engineering have seen a decline due to the changing global and European economic climate.
- 14. The points in the above paragraph relate more to the long term regenerative effects of coastal towns and will come about through capital investment either directly in the community via grants or will open up opportunities through investment in the infrastructure of the area. Many coastal towns though also suffer deprivation of resources through the revenue account also and once again we will use Torbay as an example of the issues concerned.
- 15. The Index of Multiple Deprivation 2004 places Torbay as the 94 most deprived local authority in England for the rank of average score, whilst it is accepted that the majority of Torbay has limited levels of deprivation, Torbay does have very severe pockets of deprivation.
- 16. Unlike other coastal towns, Torbay is not in receipt of Neighbourhood Renewal funding despite the severe pockets of multiple deprivation. Torbay is just outside the criteria set by the NRU to receive funding, and there are concerns that this could increase the levels of deprivation in Torbay without additional resources to target specific areas of need.

IMPACT OF POPULATION MIGRATION/TRANSIENCE

- 17. In common with many coastal towns there is significant inward migration into Torbay which significantly outweighs the net decline of the resident population and the outward migration of highly educated school leavers seeking tertiary education who do not then return to live permanently in the area until their mid to late 50's. This brings a number of significant problems, both social and physical.
 - 18. These issues include, not listed in any specific order:
 - (a) Social Care—Adult

With the particularly heavy weighting of the elderly population as a %age of the population compared to the national averages (as detailed in paragraph 6 table 2) the Council has to invest in its Adult social care budget to a significant extent. It is recognised that the Government provides funding for these services through the local government spending formula but the particular problem this Council has faced in recent years is the transfer of specific grants for identifiable clients or services into general funding but where the formulaic approach means the funding is not transferred on a "pound for pound" basis, even though the client still requires the same level of service or the actual level of service is still required generally. To alleviate some of the problems, this Council has merged its adult social care provision with the Primary Care Trust to create a new Adult Care Trust with effect from 1 December 2005 with the approval and encouragement of the CSCI Inspectorate and the Department of Health. Although this should bring about some economies of scale for the Council it should also provide a better package of care for the clients with their total needs being assessed by one individual rather than a group of people. However, in common with most similar authorities the funding provided continues to fall short of that required to meet the increasing demands and more realistic levels of care funding is needed to support these services.

The pressure on the adult social care budget is not just from the elderly but also from other groups of society. High suicide rates are very common in coastal towns and the implicit mental illness which causes such events to take place raises major budgetary pressures on both mental health and social care budgets.

(b) Social Care—Children

There are also significant issues within the Children's social care budgets which the Council, in common with many similar Councils, has to address. The Council has had a large number of children with Care Orders, often related to transience issues (see below) which require the children to be moved into specialist and often expensive care facilities away from Torbay. The Council, in conjunction with CSCI has been developing a strategy to reduce the reliance on "out of area" placements and to try and resolve any issues at source before serious care intervention is necessary. However, also in common with the many other local authorities, the funding provided through the formulae used is often inadequate to meet the needs of the area.

(c) Housing

The reliance on service industries, particularly Tourism has created a low wage economy, common to many coastal towns. Members' attention is once again drawn to table 3 shown in paragraph 9, GVA. Consequently an affordability ratio of earnings against house prices, shows Torbay to be significantly less affordable that the national figure. With 8.4m tourist nights Torbay remains the

SE-011

2. Examination of the Case for Specific Regional Initiatives and Consideration of Whether Enough Attention is Paid to Regional Disparities

2.1 The case for specific regional initiatives

- 2.1.1 There is a clear pattern of spatial disadvantage emerging in our regional economies as a result of the decline of coastal towns. In the South East there is an increasing gap in economic performance between the coastal strip and the rest of this fast growing economy; this contributes to unbalanced and unsustainable growth and huge regional disparities. For example, business density in Hastings is low at 21.3 businesses per 1,000 of population compared with the South East average of 40 and the national average of 30.
- 2.1.2 This unbalanced growth is unsustainable with overheating in some areas putting pressure on infrastructure, housing, and congestion while the coastal fringe faces low growth, few job opportunities and high levels of economic inactivity.
- 2.1.3 Disadvantage and deprivation is concentrated to an unprecedented extent along the South East's coastal strip. SEEDA reports that nine out of ten of the South East's most deprived wards are in coastal towns or cities. Moreover, half the population of Thanet and Hastings are living in areas of high deprivation. Particularly disturbing is evidence of deeply entrenched intergenerational poverty.

2.2 The level of attention paid to regional disparities

- 2.2.1 Unlike other declining areas, such as industrial steelmaking and coalmining towns, coastal towns' decline has been largely unrecognised for the best part of 40 years. However, as John Walton argues, trends of decline were identifiable by the end of the 1960s and actually began in the 1950s. This accelerated through the 1960s and 1970s as package holidays, cheap airfares and "guaranteed sunshine" became more popular. In 1968, 75% of all holidays were taken in the United Kingdom. By 1999, the numbers had declined to 44% and the number of seaside visits had dropped to 22 million from 32 million between 1980 and 2005. However, this decline had little impact on policy priorities over this period.
- 2.2.2 Arguably, recent years have brought more focus to regional disparities and the existence of significant socio-economic challenges in the UK's coastal towns. However, the problems remain and the level of attention currently falls short of what is needed to redress years of neglect.

3. THE FUTURE SECURITY OF COASTAL TOWN FUNDING

- 3.1 A brief history of coastal town regeneration and funding
- 3.1.1 Coast town decline has been largely ignored when compared with other geographies of decline and deprivation as mentioned in section 2.2. The warning signs of economic decline and deprivation were slow to be recognised and coastal towns were overlooked as areas requiring regeneration funding.
- 3.1.2 Though there were isolated local initiatives, they were piecemeal, and until 1999 seaside towns were not eligible for European Union structural funding. This was a major disadvantage given such funding's availability to other areas facing similar levels of structural economic change.
- 3.1.3 Moreover, the British Resorts Association (BRA) argues that struggling resorts did not receive central government funding in the same way as the inner cities. This is borne out by the spending of the two major sources of government regeneration funding: the Single Regeneration Budget (SRB) and the Neighbourhood Renewal Fund (NRF).
- 3.1.4 The BRA noted: "Regrettably access to SRB funding is severely limited. Few resorts currently qualify for assistance and where they do, tourism related issues often fail to be recognised as meeting the socio-economic criteria necessary to access funding".
- 3.1.5 Coastal resorts received less than 5% of funding in SRB Rounds 1 to 3 and less than 3% in Round 4. Finally, in 1998, the criteria were broadened with coastal towns specifically targeted and 44 bids were awarded to regenerate coastal towns.
- 3.1.6 The creation of the RDAs helped focus attention on coastal towns and some, for example SEEDA, have targeted declining coastal towns through their Regional Economic Strategy and Area Investment Frameworks. However, few resorts are included in the 88 areas that receive Neighbourhood Regeneration Funding. For example, Thanet which includes Margate, despite acute economic and social need, is not eligible.

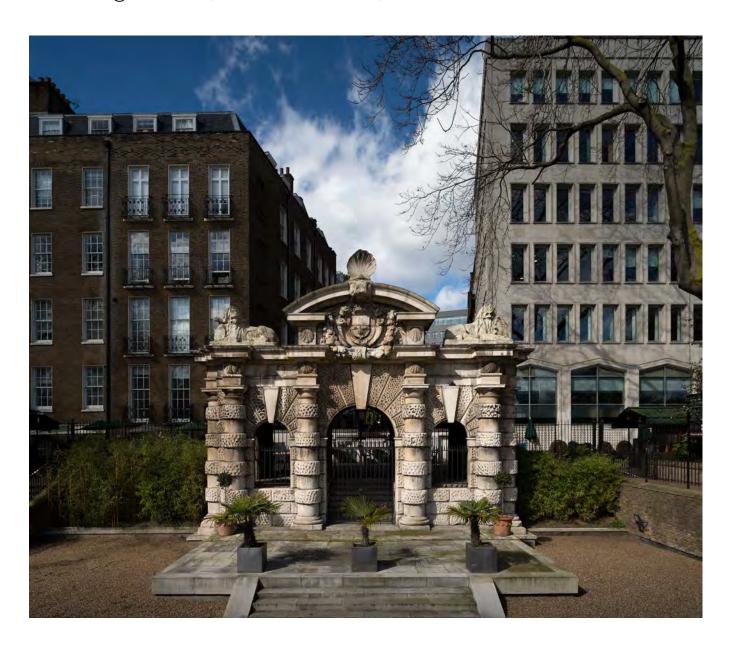
⁶ The British Seaside: Holidays and Resorts in the Twentieth Century, JK Walton (2000).

SE-012



The Setting of Heritage Assets

Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)



Summary

This document sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets. The guidance has been written for local planning authorities and those proposing change to heritage assets.

It replaces The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 – 1st edition, 2015 and Seeing the History in the View: A Method for assessing Heritage Significance within Views (English Heritage, 2011).

It is one of three related Good Practice Advice (GPA) Notes, along with *GPA1 The Historic Environment in Local Plans* and *GPA2 Managing Significance in Decision-Taking in the Historic Environment*.

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- A Staged Approach to Proportionate Decision-Taking
Step 1: Identify which heritage assets and their settings are affected
Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it
Step 4: Explore ways to maximise enhancement and avoid or minimise harm14
Step 5: Make and document the decision and

Introduction

- The purpose of this Historic England Good Practice Advice note is to provide information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance in the national Planning Practice Guide (PPG). It should be read in conjunction with Good Practice Advice notes 1 (The Historic Environment in Local Plans) and 2 (Managing) Significance in Decision-Taking in the Historic Environment). This good practice advice acknowledges the primacy of the NPPF and PPG, supporting the implementation of national policy, but does not constitute a statement of Government policy itself, nor does it seek to prescribe a single methodology or particular data sources. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives. This guidance, Good Practice Advice 3 - The Setting of Heritage Assets (2nd edition, 2017) supersedes Good Practice Advice 3 - The Setting of Heritage Assets (1st edition, 2015) and Seeing the History in the View: A Method for assessing Heritage Significance within Views (English Heritage, 2011).
- The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or invest need to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time those taking decisions need enough information to understand the issues.

- 3 This note gives assistance concerning the assessment of the setting of heritage assets, given:
- the statutory obligation on decision-makers to have special regard to the desirability of preserving listed buildings and their settings, and
- the policy objectives in the NPPF and the PPG establishing the twin roles of setting (see boxes below): it can contribute to the significance of a heritage asset, and it can allow that significance to be appreciated. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the heritage asset's conservation, including sustaining significance (NPPF, paragraph 132).
- 4 This note therefore starts by giving general advice on understanding setting and how it may contribute to the significance of heritage assets, before adding advice on how views play a part in setting; it ends by suggesting a staged approach to taking decisions on the level of the contribution which setting and related views make to the significance of heritage assets (Part 2, paragraphs 17–42).
- 5 Consideration of the contribution of setting to the significance of heritage assets, and how it can enable that significance to be appreciated, will almost always include the consideration of views. The staged approach to taking decisions on setting given here can also be used to assess the contribution of a view, or views, to the significance of heritage assets and the ability to appreciate that significance.
- 6 Views, however, can of course be valued for reasons other than their contribution to heritage significance. They may, for example, be related to the appreciation of the wider landscape, where there may be little or no association with heritage assets. Landscape character and visual amenity are also related planning considerations. The assessment and management of views in

the planning process may therefore be partly or wholly separate from any consideration of the significance of heritage assets. This advice therefore directs readers elsewhere for approaches to landscape and visual impact assessment and amenity valuation (paragraphs 15 and 16).

Part 1: Settings and Views

NPPF Glossary: Setting of a heritage asset

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF, Annex 2: Glossary).

PPG: What is the setting of a heritage asset and how should it be taken into account?

The "setting of a heritage asset" is defined in the Glossary of the National Planning Policy Framework.

A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in

which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation (PPG, paragraph: 013, reference ID: 18a-013-20140306).

Difference between setting and curtilage, character, context and landscape

- 7 Setting is separate from the concepts of curtilage, character and context:
- Curtilage is a legal term describing an area around a building and, for listed structures, the extent of curtilage is defined by consideration of ownership, both past and present, functional association and layout. The setting of a heritage asset will include, but generally be more extensive than, its curtilage (if it has one) (see Identification and Designation of Heritage Assets: Listed Buildings in the Historic England Heritage Protection Guide).
- The historic character of a place is the group of qualities derived from its past uses that make it distinctive. This may include: its associations with people, now and through time; its visual aspects; and the features, materials, and spaces associated with its history, including its original configuration and subsequent losses and changes.

 Character is a broad concept, often used in relation to entire historic areas and landscapes, to which heritage assets and their settings may contribute.
- The context of a heritage asset is a non-statutory term used to describe any relationship between it and other heritage assets, which is relevant to its significance, including cultural, intellectual, spatial or functional. Contextual relationships apply irrespective of distance, sometimes extending well beyond what might be considered an asset's setting, and can include the relationship of one heritage asset to another of the same period or function, or with the same designer or architect. A range of additional meanings is available for the term 'context', for example in relation to archaeological context and to the context of new developments, as well as customary usages. Setting may include associative relationships that are sometimes referred to as 'contextual'.

■ To avoid uncertainty in discussion of setting, a landscape is 'an area, as perceived by people, the character of which is the result of the action and interaction of natural and/or human factors' (Glossary, *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition, published by the Landscape Institute and the Institute of Environmental Management and Assessment, p 157, based on the definition in the European Landscape Convention, European Treaty Series – No. 176, Florence, 20.x.2000, p 2).

The extent of setting

- 8 The NPPF makes it clear that the extent of the setting of a heritage asset 'is not fixed and may change as the asset and its surroundings evolve' (NPPF, Annex 2: Glossary). All of the following matters may affect considerations of the extent of setting:
- While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their setting and the values placed on that setting and therefore the significance of the heritage asset.
- Extensive heritage assets, such as historic parks and gardens, landscapes and townscapes, can include many heritage assets, historic associations between them and their nested and overlapping settings, as well as having a setting of their own. A conservation area is likely to include the settings of listed buildings and have its own setting, as will the hamlet, village or urban area in which it is situated (explicitly recognised in green belt designations).

The Courts have held that it is legitimate in appropriate circumstances to include within a conservation area the setting of buildings that form the heart of that area (R v Canterbury City Council ex parte David Halford, February 1992; CO/2794/1991). And NPPF paragraph 80, for example, makes it clear that historic towns are regarded as having a setting.

Consideration of setting in urban areas, given the potential numbers and proximity of heritage assets, often overlaps with considerations both of townscape/urban design and of the character and appearance of conservation areas. Conflict between impacts on setting and other aspects of a proposal can be avoided or mitigated by working collaboratively and openly with interested parties at an early stage.

Setting and the significance of heritage assets

9 Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance. The following paragraphs examine some more general considerations relating to setting and significance.

The setting of World Heritage Sites may be protected as 'buffer zones' – see PPG, paragraph: 033 Reference ID: 2a-033-20140306.

Change over time

Settings of heritage assets change over time. Understanding this history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance but settings which have changed may also themselves enhance significance, for instance where townscape character has been shaped by cycles of change over the long term. Settings may also have suffered negative impact from inappropriate past developments and may be enhanced by the removal of the inappropriate structure(s).

Cumulative change

Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it (see also paragraph 40 for screening of intrusive developments).

Access and setting

Because the contribution of setting to significance does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community who may be few in number. The potential for

appreciation of the asset's significance may increase once it is interpreted or mediated in some way, or if access to currently inaccessible land becomes possible.

Buried assets and setting

Heritage assets that comprise only buried remains may not be readily appreciated by a casual observer. They nonetheless retain a presence in the landscape and, like other heritage assets, may have a setting. These points apply equally, in some rare cases, to designated heritage assets such as scheduled monuments or Protected Wreck Sites that are periodically, partly or wholly submerged, eg in the intertidal zone on the foreshore.

- The location and setting of historic battles, otherwise with no visible traces, may include important strategic views, routes by which opposing forces approached each other and a topography and landscape features that played a part in the outcome.
- Buried archaeological remains may also be appreciated in historic street or boundary patterns, in relation to their surrounding topography or other heritage assets or through the longterm continuity in the use of the land that surrounds them. While the form of survival of an asset may influence the degree to which its setting contributes to significance and the weight placed on it, it does not necessarily follow that the contribution is nullified if the asset is obscured or not readily visible.

Designed settings

Many heritage assets have settings that have been designed to enhance their presence and visual interest or to create experiences of drama or surprise. In these special circumstances, these designed settings may be regarded as heritage assets in their own right, for instance the designed landscape around a country house. Furthermore they may, themselves, have a wider setting: a

park may form the immediate surroundings of a great house, while having its own setting that includes lines-of-sight to more distant heritage assets or natural features beyond the park boundary. Given that the designated area is often restricted to the 'core' elements, such as a formal park, it is important that the extended and remote elements of the design are included in the evaluation of the setting of a designed landscape. Reference is sometimes made to the 'immediate', 'wider' and 'extended' setting of heritage assets, but the terms should not be regarded as having any particular formal meaning. While many day-to-day cases will be concerned with development in the vicinity of an asset, development further afield may also affect significance, particularly where it is largescale, prominent or intrusive. The setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary. It can include:

- land which is not part of the park or garden but which is associated with it by being adjacent and visible from it
- land which is not part of the site but which is adjacent and associated with it because it makes an important contribution to the historic character of the site in some other way than by being visible from it, and
- land which is a detached part of the site and makes an important contribution to its historic character either by being visible from it or in some other way, perhaps by historical association

Setting and urban design

As mentioned above (paragraph 8, The extent of setting), the numbers and proximity of heritage assets in urban areas mean that the protection and enhancement of setting is intimately linked to townscape and urban

design considerations. These include the degree of conscious design or fortuitous beauty and the consequent visual harmony or congruity of development, and often relates to townscape attributes such as enclosure, definition of streets and spaces and spatial qualities as well as lighting, trees, and verges, or the treatments of boundaries or street surfaces.

See Managing Significance in Decision— Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2 (2015) and Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (2016).

Setting and economic viability

Sustainable development under the NPPF can have important positive impacts on heritage assets and their settings, for example by bringing an abandoned building back into use or giving a heritage asset further life. However, the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development. For instance, a new road scheme affecting the setting of a heritage asset, while in some cases increasing the public's ability or inclination to visit and/or use it, thereby boosting its economic viability and enhancing the options for the marketing or adaptive re-use of a building, may in other cases have the opposite effect.

Views and setting

10 The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.

- 11 Views which contribute more to understanding the significance of a heritage asset include:
- those where the composition within the view was a fundamental aspect of the design or function of the heritage asset
- those where town- or village-scape reveals views with unplanned or unintended beauty
- those with historical associations, including viewing points and the topography of battlefields
- those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected
- those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant
- 12 Assets, whether contemporaneous or otherwise, which were intended to be seen from one another for aesthetic, functional, ceremonial or religious reasons include:
- military and defensive sites
- telegraphs or beacons
- prehistoric funerary and ceremonial sites
- historic parks and gardens with deliberate links to other designed landscapes and remote 'eye-catching' features or 'borrowed' landmarks beyond the park boundary
- 13 Views may be identified and protected by local planning policies and guidance for the part they play in shaping our appreciation and understanding of England's historic environment, whether in rural or urban areas and whether designed to be seen as a unity or

as the cumulative result of a long process of development. This does not mean that additional views or other elements or attributes of setting do not merit consideration. Such views include:

- views identified as part of the plan-making process, such as those identified in the London View Management Framework (LVMF, Mayor of London 2010) and Oxford City Council's View Cones (2005) and Assessment of the Oxford View Cones (2015 Report)
- views identified in character area appraisals or in management plans, for example of World Heritage Sites
- important designed views from, to and within historic parks and gardens that have been identified as part of the evidence base for development plans, and
- views that are identified by local planning authorities when assessing development proposals

Where complex issues involving views come into play in the assessment of such views – whether for the purposes of providing a baseline for plan-making or for development management – a formal views analysis may be merited.

Landscape Assessment and Amenity

- 14 Analysis of setting is different from landscape assessment. While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all. Careful analysis is therefore required to assess whether one heritage asset at a considerable distance from another, though intervisible with it a church spire, for instance is a major component of the setting, rather than just an incidental element within the wider landscape.
- 15 Assessment and management of both setting and views are related to consideration of the wider landscape, which is outside the scope of this advice note. Additional advice on views is available in *Guidelines for Landscape and*

Being tall structures, church towers and spires are often widely visible across land- and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view.

Visual Impact Assessment, 3rd edition, published by the Landscape Institute and the Institute of Environmental Management and Assessment (in partnership with Historic England).

16 Similarly, setting is different from general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.

Part 2: Setting and Views - A Staged Approach to Proportionate Decision-Taking

All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it. This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an extensive tract of flat land may increase the sensitivity of the setting (ie the capacity of

the setting to accommodate change without harm to the heritage asset's significance) or of views of the asset. This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis.

- 18 Conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development. Many places coincide with the setting of a heritage asset and are subject to some degree of change over time. NPPF policies, together with the guidance on their implementation in the Planning Policy Guidance (PPG), provide the framework for the consideration of change affecting the setting of undesignated and designated heritage assets as part of the decision-taking process (NPPF, paragraphs 131-135 and 137).
- 19 Amongst the Government's planning policies for the historic environment is that conservation decisions are based on a proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset. Historic England recommends the following broad approach to assessment, undertaken as a series of

steps that apply proportionately to the complexity of the case, from straightforward to complex:

- **Step 1**: Identify which heritage assets and their settings are affected
- **Step 2**: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
- **Step 3**: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it
- **Step 4:** Explore ways to maximise enhancement and avoid or minimise harm
- **Step 5**: Make and document the decision and monitor outcomes

Each of these steps is considered in more detail below.

For further information on Strategic Environmental Assessment and Environmental Impact Assessment, see *Sustainability Appraisal* and Strategic Environmental Assessment: Historic England Advice Note 8 (2016).

Development proposals involving the setting of single and less significant assets and straightforward effects on setting may best be handled through a simple check-list approach and can usefully take the form of a short narrative statement for each assessment stage, supported by adequate plans and drawings, etc.

Cases involving more significant assets, multiple assets, or changes considered likely to have a major effect on significance will require a more detailed approach to analysis, often taking place within the framework of Environmental Impact Assessment procedures. Each of the stages may involve detailed assessment techniques and complex forms of

analysis such as viewshed analyses, sensitivity matrices and scoring systems. Whilst these may assist analysis to some degree, as setting and views are matters of qualitative and expert judgement, they cannot provide a systematic answer. Historic England recommends that, when submitted as part of a Design and Access Statement, Environmental Statement or evidence to a public Inquiry, technical analyses of this type should be seen primarily as material supporting a clearly expressed and non-technical narrative argument that sets out 'what matters and why' in terms of the heritage significance and setting of the assets affected, together with the effects of the development upon them.

Step 1: Identify which heritage assets and their settings are affected

- The setting of a heritage asset is 'the surroundings in which a heritage asset is experienced' (NPPF, Annex 2: Glossary). Where that experience is capable of being affected by a proposed development (in any way) then the proposed development can be said to affect the setting of that asset. The starting point of the analysis is to identify those heritage assets likely to be affected by the development proposal.
- 21 It is important that, at the pre-application or scoping stage, the local authority, having due regard to the need for proportionality:
- indicates whether it considers a proposed development has the potential to affect the setting of (a) particular heritage asset(s), or
- specifies an 'area of search' around the proposed development within which it is reasonable to consider setting effects, or
- advises the applicant to consider approaches such as a 'Zone of Visual Influence' or 'Zone of Theoretical Visibility' in relation to the proposed development in order to better identify heritage assets and settings that may be affected

A 'Zone of Visual Influence' defines the areas from which a development may potentially be totally or partially visible by reference to surrounding topography. However, such analysis does not take into account any landscape artefacts such as trees, woodland, or buildings, and for this reason a 'Zone of Theoretical Visibility' which includes these factors is to be preferred.

22 For developments that are not likely to be prominent or intrusive, the assessment of effects on setting may often be limited to the immediate surroundings, while taking account

- of the possibility that setting may change as a result of the removal of impermanent landscape or townscape features, such as hoardings or planting.
- The area of assessment for a large or 23 prominent development, such as a tall building in an urban environment or a wind turbine in the countryside or offshore, can often extend for a distance of several kilometres. In these circumstances, while a proposed development may affect the setting of numerous heritage assets, it may not impact on them all equally, as some will be more sensitive to change affecting their setting than others. Local planning authorities are encouraged to work with applicants in order to minimise the need for detailed analysis of very large numbers of heritage assets. They may give advice at the pre-application stage (or the scoping stage of an Environmental Statement) on those heritage assets, or categories of heritage asset, that they consider most sensitive as well as on the level of analysis they consider proportionate for different assets or types of asset.
- 24 Where spatially extensive assessments relating to large numbers of heritage assets are required, Historic England recommends that local planning authorities give consideration to the practicalities and reasonableness of requiring assessors to access privately owned land. In these circumstances, they should also address the extent to which assessors can reasonably be expected to gather and represent community interests and opinions on changes affecting settings.
- 25 Where the development proposal affects views which may be particularly helpful in allowing the significance of an asset to be appreciated and which are therefore part of the setting, it is often necessary to identify viewing points for assessment. An explanation why a particular viewing point has been selected will be needed. Sometimes a heritage asset is best appreciated while moving (for example, in a designed landscape, where its three-dimensional

formal qualities are an essential part of its significance). These, such as the changing views of the Tyne bridges viewed from the banks of the River Tyne or of the Tower of London from the south bank of the River Thames in London, are often termed 'kinetic' views.

Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

The second stage of any analysis is to assess whether the setting of an affected heritage asset makes a contribution to its significance and the extent and/or nature of that contribution; both setting, and views which form part of the way a setting is experienced, may be assessed additionally for the degree to which they allow significance to be appreciated. We recommend that this assessment should first address the key attributes of the heritage asset itself and then consider:

- the physical surroundings of the asset, including its relationship with other heritage assets
- the asset's intangible associations with its surroundings, and patterns of use
- the contribution made by noises, smells, etc to significance, and
- the way views allow the significance of the asset to be appreciated
- checklist of the potential attributes of a setting that it may be appropriate to consider in order to define its contribution to the asset's heritage values and significance. Only a limited selection of the attributes listed will be of particular relevance to an asset. A sound assessment process will identify these at an early stage, focus on them, and be as clear as possible what emphasis attaches to them. In doing so, it will generally be useful to consider, insofar as is possible, the way these attributes have contributed to the

A handy way of visualising the contribution of setting to the significance of heritage assets may be diagrammatically to map past and present relationships between a heritage asset and its surroundings, weighting the mapped connections to demonstrate the relative contribution of the relationship to the significance of the asset or the ability to appreciate the significance. By setting out the relationships and considering the level of their contribution to significance, it is possible to gauge impact more transparently and more consistently.

Change can also have the effect of strengthening relationships, for example by removing visual impediments such that significance is better revealed; mapping thereby provides one mechanism for identifying opportunities for enhancement.

significance of the asset in the past (particularly when it was first built, constructed or laid out), the implications of change over time, and their contribution in the present.

- 28 The local authority Historic Environment Record is an important source of information to support this assessment and, in most cases, will be able to provide information on the wider landscape context of the heritage asset as well as on the asset itself. Landscape Character Assessments, Historic Landscape Character Assessments, Conservation Area Appraisals, the Register of Parks and Gardens and the Parks & Gardens UK database are also important sources in this regard.
- 29 This assessment of the contribution to significance made by setting will provide the baseline for establishing the effects of a proposed development on significance, as set out in 'Step 3' below. It will, therefore, be focused on the need to support decision-taking in respect of the proposed development. A similar approach to

assessment may also inform the production of a strategic, management or conservation plan in advance of any specific development proposal, although the assessment of significance required for studies of this type will address the setting of the heritage asset 'in the round', rather than focusing on a particular development site.

30 An assessment of the contribution to significance of a view does not depend alone on the significance of the heritage assets in the view but on the way the view allows that significance to be appreciated. The view may be part of a

landscape, townscape or other design intended to allow a particular attribute of the asset to be enjoyed, such as its reflection in a body of water. Heritage assets (sometimes of different periods) may have been deliberately linked by the creation of views which were designed to have a particular effect, adding meanings through visual cross-references. Composite or fortuitous views which are the cumulative result of a long history of development, particularly in towns and cities, may become cherished and may be celebrated in artistic representations. The ability to experience

Assessment Step 2 Checklist

The starting point for this stage of the assessment is to consider the significance of the heritage asset itself and then establish the contribution made by its setting. The following is a (non-exhaustive) check-list of potential attributes of a setting that may help to elucidate its contribution to significance. It may be the case that only a limited selection of the attributes listed is likely to be particularly important in terms of any single asset.

The asset's physical surroundings

- Topography
- Aspect
- Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains)
- Definition, scale and 'grain' of surrounding streetscape, landscape and spaces
- Formal design eg hierarchy, layout
- Orientation and aspect
- Historic materials and surfaces
- Green space, trees and vegetation
- Openness, enclosure and boundaries
- Functional relationships and communications
- History and degree of change over time

Experience of the asset

- Surrounding landscape or townscape character
- Views from, towards, through, across and including the asset
- Intentional intervisibility with other historic and natural features
- Visual dominance, prominence or role as focal point
- Noise, vibration and other nuisances
- Tranquillity, remoteness, 'wildness'
- Busyness, bustle, movement and activity
- Scents and smells
- Diurnal changes
- Sense of enclosure, seclusion, intimacy or privacy
- Land use
- Accessibility, permeability and patterns of movement
- Degree of interpretation or promotion to the public
- Rarity of comparable survivals of setting
- Cultural associations
- Celebrated artistic representations
- Traditions

these same views today can illuminate the design principles and taste of our predecessors.

31 The impact of seasonal and day/night changes on a view or views needs to be considered, including other changes that may mean that a view at a particular point in time may not be representative of the experience over longer periods. Does summer foliage hide an asset that is visible in winter? Does artificial external lighting at night emphasise some aspects of an asset and leave others in the dark.

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it

- The third stage of any analysis is to identify the effects a development may have on setting(s) and to evaluate the resultant degree of harm or benefit to the significance of the heritage asset(s). In some circumstances, this evaluation may need to extend to cumulative and complex impacts which may have as great an effect on heritage assets as large-scale development and which may not solely be visual.
- 33 The wide range of circumstances in which setting may be affected and the range of heritage assets that may be involved precludes a single approach for assessing effects. Different approaches will be required for different circumstances. In general, however, the assessment should address the attributes of the proposed development in terms of its:
- location and siting
- form and appearance
- wider effects
- permanence
- The box (see **below**) provides a more detailed list of attributes of the development proposal that it may be appropriate to consider during the assessment process. This list is not intended to be exhaustive and not all attributes will apply to a particular development proposal.

Depending on the level of detail considered proportionate to the purpose of the assessment, it would normally be appropriate to make a selection from the list, identifying those particular attributes of the development requiring further consideration and considering what emphasis attaches to each. The key attributes chosen for consideration can be used as a simple check-list, supported by a short explanation, as part of a Design and Access Statement, or may provide the basis for a more complex assessment process that might sometimes draw on quantitative approaches to assist analysis.

- In particular, it would be helpful for local planning authorities to consider at an early stage whether development affecting the setting of a heritage asset can be broadly categorised as having the potential to enhance or harm the significance of the asset through the principle of development alone; through the scale, prominence, proximity or placement of development; or through its detailed design. Determining whether the assessment will focus on spatial, landscape and views analysis, on the application of urban design considerations, or on a combination of these approaches will clarify for the applicant the breadth and balance of professional expertise required for its successful delivery.
- 36 Cumulative assessment is required under the EU Directive on EIA. Its purpose is to identify impacts that are the result of introducing the development into the view in combination with other existing and proposed developments. The combined impact may not simply be the sum of the impacts of individual developments; it may be more, or less.

Assessment Step 3 Checklist

The following is a (non-exhaustive) check-list of the potential attributes of a development affecting setting that may help to elucidate its implications for the significance of the heritage asset. It may be that only a limited selection of these is likely to be particularly important in terms of any particular development.

Location and siting of development

- Proximity to asset
- Position in relation to relevant topography and watercourses
- Position in relation to key views to, from and across
- Orientation
- Degree to which location will physically or visually isolate asset

Form and appearance of development

- Prominence, dominance, or conspicuousness
- Competition with or distraction from the asset
- Dimensions, scale and massing
- Proportions
- Visual permeability (extent to which it can be seen through), reflectivity
- Materials (texture, colour, reflectiveness, etc)
- Architectural and landscape style and/or design
- Introduction of movement or activity
- Diurnal or seasonal change

Wider effects of the development

- Change to built surroundings and spaces
- Change to skyline, silhouette
- Noise, odour, vibration, dust, etc
- Lighting effects and 'light spill'
- Change to general character (eg urbanising or industrialising)
- Changes to public access, use or amenity
- Changes to land use, land cover, tree cover
- Changes to communications/accessibility/ permeability, including traffic, road junctions and car-parking, etc
- Changes to ownership arrangements (fragmentation/permitted development/etc)
- Economic viability

Permanence of the development

- Anticipated lifetime/temporariness
- Recurrence
- Reversibility

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

37 Maximum advantage can be secured if any effects on the significance of a heritage asset arising from development likely to affect its setting are considered from the project's inception. Early assessment of setting may provide a basis for agreeing the scope and form of development, reducing the potential for disagreement and challenge later in the process.

38 Enhancement (see NPPF, paragraph 137) may be achieved by actions including:

- removing or re-modelling an intrusive building or feature
- replacement of a detrimental feature by a new and more harmonious one
- restoring or revealing a lost historic feature or view
- introducing a wholly new feature that adds to the public appreciation of the asset
- introducing new views (including glimpses or better framed views) that add to the public experience of the asset, or
- improving public access to, or interpretation of, the asset including its setting
- 39 Options for reducing the harm arising from development may include the repositioning of a development or its elements, changes to its design, the creation of effective long-term visual or acoustic screening, or management measures secured by planning conditions or legal agreements. For some developments affecting setting, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, for example where impacts are caused by fundamental issues such as the proximity, location, scale, prominence or noisiness of a development. In other cases, good design may reduce or remove the harm, or provide enhancement. Here the design quality may be

an important consideration in determining the balance of harm and benefit.

40 Where attributes of a development affecting setting may cause some harm to significance and cannot be adjusted, screening may have a part to play in reducing harm. As screening can only mitigate negative impacts, rather than removing impacts or providing enhancement, it ought never to be regarded as a substitute for well-designed developments within the setting of heritage assets. Screening may have as intrusive an effect on the setting as the development it seeks to mitigate, so where it is necessary, it too merits careful design. This should take account of local landscape character and seasonal and diurnal effects, such as changes to foliage and lighting. The permanence or longevity of screening in relation to the effect on the setting also requires consideration. Ephemeral features, such as hoardings, may be removed or changed during the duration of the development, as may woodland or hedgerows, unless they enjoy statutory protection. Management measures secured by legal agreements may be helpful in securing the long-term effect of screening.

Step 5: Make and document the decision and monitor outcomes

- It is good practice to document each stage of the decision-making process in a non-technical and proportionate way, accessible to non-specialists. This should set out clearly how the setting of each heritage asset affected contributes to its significance or to the appreciation of its significance, as well as what the anticipated effect of the development will be, including of any mitigation proposals. Despite the wide range of possible variables, normally this analysis should focus on a limited number of key attributes of the asset, its setting and the proposed development, in order to avoid undue complexity. Such assessment work is a potentially valuable resource and should be logged in the local Historic Environment Record.
- The true effect of a development on setting may be difficult to establish from plans, drawings and visualisations. It may be helpful to review the success of a scheme and to identify any 'lessons learned' once a development affecting setting has been implemented that was intended to enhance, or was considered unlikely to detract from, the significance of a heritage asset. This will be particularly useful where similar developments are anticipated in the future.

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BRIEF

Amazon makes 7-year deal with French robotics company

By Matt Leonard Published Jan. 11, 2019

Dive Brief:

- Amazon is entering into a seven-year agreement with Balyo, a
 French company that sells autonomous forklifts, according to
 a press release. If Amazon purchases up to 300 million euros
 (\$346 million) in Balyo product within the seven years, the ecommerce giant will be entitled, via stock warrants, to acquire
 up to 29% of the robot-maker's stock at current pricing.
- Balyo offers two robotic forklifts: the Yale and the Hyster. Each comes in three different configurations with varying load capacity ranging from 3,000 to 15,000 pounds.
- Amazon currently uses robotic equipment in its warehouses that was developed by Kiva Systems. Amazon purchased Kiva in 2012. The company was eventually folded into Amazon Robotics.

Dive Insight:

This news comes as organizations are increasingly looking to automation to get jobs done in the warehouse. Last year, UPS announced plans to invest \$20 million in automation and equipment. FedEx also began using autonomous vehicles at a North Carolina shipping hub, according to The New York Times.

Amazon could contribute significantly to Balyo's revenue through equipment purchases. Balyo's expected revenue for 2018 is €23.3 million (\$26.9 million).

The French company does have some competition in the automated forklift arena. Linde is another player in the space with forklifts that can find their own way through warehouses and aid in repetitive tasks. And ZF Freidrichshafen launched the ZF Innovation Forklift in May.

The implementation of these types of autonomous systems could reduce operating expenses and increase revenue, according to a report from Deloitte.

"Autonomous robots can be used to improve the speed and accuracy of routine operations, particularly in warehousing and manufacturing spaces; work side-by-side with humans for added efficiency; and reduce the risk of employee injury in dangerous environments," the report said.

A 2016 report from DHL said, "Up until now, robotics technology has not made a large impact in the world of logistics." It went onto say this was "about to change." Now, three years later, and the company says robotics has helped lead to 25% increase in productivity.

Recommended Reading:



Download Balyo's press release ☐

SE-014

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North of England airport site set for further expansion

07 / 06 / 2018



Doncaster Sheffield Airport (DSA) has been given the green light from the local council for further expansion of its 1,600 acre Aero Centre Yorkshire.

The expansion will include up to 600,000 sq ft of office, general industry, storage and distribution space developed with the potential to create up to 800 jobs.

It follows the launch in March of the airport Vision Plan (https://www.aircargonews.net/news/airport/single-view/news/cargo-at-the-centre-of-doncaster-sheffield-airports-master-plan.html) by owners Peel Land and Property. The DSA Vision envisages a 'Connected National Economy' that "realises the airport's potential as a major catalyst for transforming the north of England, creating new employment, housing tourism and aviation capacity"

SE-015



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As Official Logistics Partner of Formula 1, DHL draws on over 35 years' experience handling complex, time-critical, international motorsports logistics.

In the countdown to each race, we criss-cross the globe enabling not only the delivery of the precious cars themselves but thousands of litres of fuel as well as essential event equipment and infrastructure. The Formula 1 freight travels by land, sea and air, filling no less than six Boeing 747 cargo planes for each so called "fly-away" race outside of Europe, where most of the teams are still based.

As Formula 1's popularity has spread around the world, the Championship is travelling ever further afield. Whereas in its early days races mainly took place in Europe, the number of non-European races has doubled over the last 15 years. Formula 1 fans can now experience the thrill of a Grand Prix in countries including China, Singapore, Azerbaijan and Abu Dhabi.

The 2017 FIA Formula One World Championship sees 20 world-class drivers competing to defy the speed barriers over 20 races, covering no less than 5 continents in 9 months. A phenomenal challenge of skill, planning and logistics for the tireless motorsport

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KEY STATS

10 Teams

20 Drivers

20 Races

5 Continents

9 Months



Formula 1 fans can now experience the thrill of a Grand Prix in 20 countries including China, Singapore, Azerbaijan and Abu Dhabi.



2,000

tons of Formula 1 freight is moved each race



600 tons of air freight



1,000 tons o

1,000 tons of sea freight

₌ 240





131,995 km

travelled by air throughout the season using six Boeing 747 planes

As Official Logistics Partner of Formula 1, DHL draws on over 35 years' experience handling complex, time-critical, international motorsports logistics. Formula 1 freight travels by land, air and sea to 5 continents in 9 months, requiring detailed planning of complex global routing to ensure reliable delivery for the start of the race.



40-50 tons of freight per team on average



30

freight containers of hospitality equipment



150,000 kg



10,000 kg of electronics is