

**MANSTON AIRPORT DEVELOPMENT CONSENT ORDER EXAMINATION
SUBMISSION TO DEADLINE 9:
Comments on Information requested by the ExA and received from the
Applicant to Deadline 8 and Comment on PD-018**

**Thanet District Council and Ramsgate Town Council Properties for use by
the Community (designated as Communities, Museums & Theatres,
Recreational Parks) that Fall within Each of the Noise Contours**

1. We respectfully submit the Table below for the attention of the Examining Authority with supporting evidence to show that **all of the Thanet District Council and Ramsgate Town Council Properties for use by the Community** (designated as Communities, Museums & Theatres, Recreational Parks) that are identifiable by a desktop search¹ (together the “**Communities, Museums & Theatres, Recreational Parks**”) as well as our beaches are predicted to exceed the 51 dB LAeq 16 hr noise contour.
2. As you will be aware this Table evidences clearly a very high level of community areas materially impacted by noise **with a majority of these Communities, Museums & Theatres, Recreational Parks impacted at levels >57 dB LAeq 16 hr noise contour** including a 13 acre park and beaches all with disabled access.
3. This is of particular concern in light of the socio-economic demographic of Ramsgate and perhaps engages the Equality Act 2010. We note that an Equality Assessment was untaken as part of the Airports National Policy Statement in relation to other proposed airport developments at LGW-2R, LHR-ENR and LHR-NWR².
4. We note that the Applicant has not engaged with or contributed to the Thanet District Council Playing Pitch Strategy³, Ramsgate Football Club⁴,

¹ <https://www.thanet.gov.uk/info-pages/parks-and-open-spaces/>
<https://www.thanet.gov.uk/wp-content/uploads/2019/01/Transparency-Asset-Report-January-2019-Transparency.pdf>

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/713315/airports-nps-equality-assessment.pdf

³ <https://www.thanet.gov.uk/wp-content/uploads/2018/08/Playing-Pitch-Strategy.pdf>

⁴ <https://www.ramsgate-fc.co.uk/>

Beach within Reach⁵ or Ellington Park Regeneration Project⁶ (by way of example only).

5. Ellington Park will be within the >57 dB LAeq 16 hour noise contour if the DCO is granted. The National Lottery Heritage Fund have funded the Ellington Park Project and unlocked £2m (two million pounds) investment in Ellington Park. This investment is at significant risk (if the DCO is granted) as it is linked to Key Performance Indicators (KPIs) including the number of visitors to the park. Ellington Park is expected to attract 120,000 visitors a year as a KPI of the £2m investment.
6. As the Examining Authority will be aware under Section 6 of the Appraisal of Sustainability: Airports National Policy Statement Non-Technical Summary of June 2018 the proposed scheme must:
 - (a) **avoid or minimise negative effects** on community viability, including housing, **facilities and indirect effects**,
 - (b) avoid or minimise **disproportionate impacts of any social group**,
 - (c) maintain and where possible **improve the quality of life for local residents** and the wider population,
 - (d) **minimise and where possible reduce noise impact** on human receptors,
 - (e) **conserve and where appropriate enhance heritage assets** and the wider **historic environment** including **buildings, structures, landscapes, townscales** and archaeological remains, and
 - (f) **promote the protection and improvement of landscapes, townscales, waterscales** and the **natural features** including areas of tranquility and dark skies.
7. The Applicant's proposed scheme fails on all of the above counts (bold added for emphasis).
8. There are no feasible means of mitigation for the above Community (designated as Communities, Museums & Theatres, Recreational Parks) and beaches which are spread throughout Ramsgate.

⁵ <https://www.beachwithinreach.org.uk/>

⁶ <https://www.thanet.gov.uk/info-pages/ellington-park-regeneration-scheme/>

9. We therefore respectfully request the Examining Authority to make a **robust recommendation** to the Secretary of State to **refuse to grant the Applicant's DCO**.
10. We respectfully remind the Examining Authority that in every single case over these past twenty-six years and numerous reports, Manston Airport has been fairly considered and has consistently been rejected by the Government, largely on the grounds of poor geographical location with regards to distance from sources of demand **and proximity to Ramsgate**. Needless to say, the geography has not changed in the past twenty-six years, nor is it likely to in the period to 2050⁷.

⁷ **Runway Capacity to Serve the South East (RUCATSE) report for the Department of Transport ("DfT") (1993)**, which concluded that Manston *"did not merit detailed assessment"*

The Future Development of Air Transport in the UK - South East (DfT, 2002) which concluded with regards to Manston that *"key constraints are its geographic position in relation to the major sources of demand and noise impacts over the nearby town of Ramsgate"*

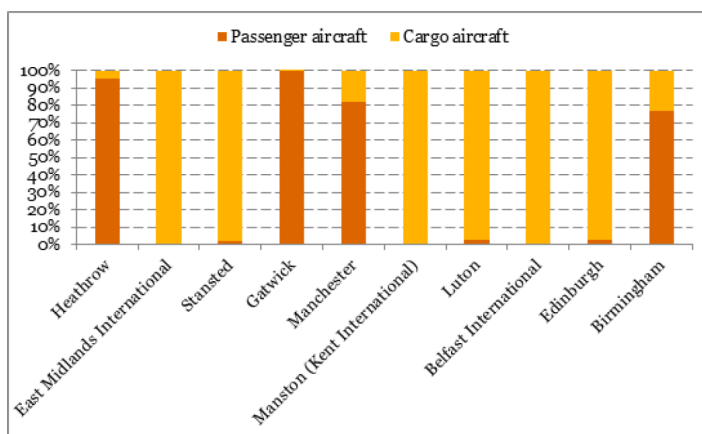
Sir Howard Davies' Airports Commission Interim Report (2013) which reviewed the case for Manston as one of 52 proposals received in its shortlisting process and dismissed it as an option for further consideration in the final report since it *"did not fit with the Commission's remit or offer a solution to the key question of providing additional long-term capacity and connectivity for the UK"*.

Airports Commission Interim Report : The Air Freight Industry in the UK (PwC, 2013)

Of particular note is that Manston was rejected for any further consideration after being considered by the Airports Commission ("AC") in context as a dedicated cargo-only carrier in this report, which formed part of the AC's suite of Economics Analysis Consultants Reports.

The first of the two diagrams taken directly from this report, clearly shows Manston was taken into account and duly considered as part of this report. During this period, Manston was operating (unsuccessfully) as a pure freight airport - as per the current proposal by the Applicant.

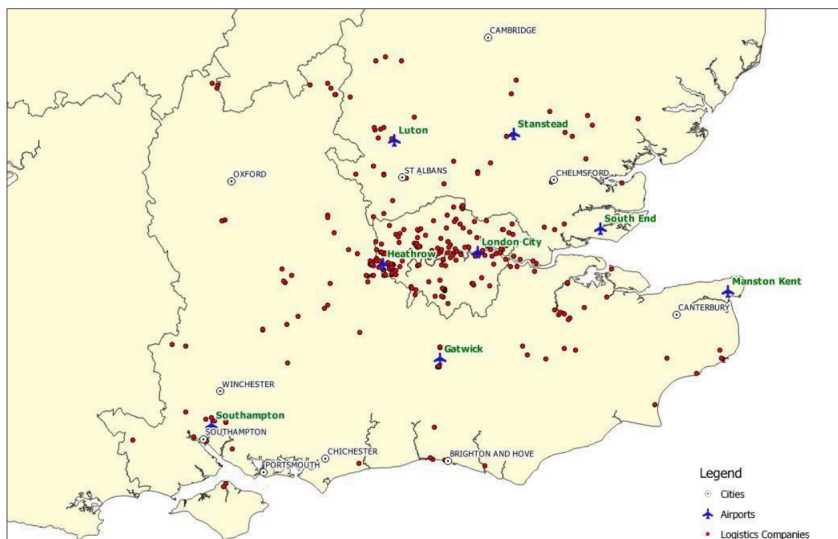
Figure 31: Percentage of freight by aircraft configuration – 2012



Source: The Air Freight Industry in the UK, (AC/PwC 2013), Page 34

The second diagram gives some indication as to one of the many reasons why Manston struggles to compete in the air freight market in the UK and consistently failed to achieve viability.

The map below highlights the presence of third party logistics companies in South East England, with a clustering around Heathrow:



Source: The Air Freight Industry in the UK, (AC/PwC 2013), Page 43

Airports Commission Final Report (2015)

After being duly and fairly considered as both a passenger airport and in PwCs accompanying economic analysis in the context of a freight-only operator - as per the Applicant's current proposal - Manston was deemed unworthy of even a single mention in the Airports Commission Final Report of 2015.

Airports National Policy Statement (June 2018)

The ANPS confirms the significant role of the Airports Commission and its reports in establishing the evidence base for the ANPS and evaluating *"how any need for additional capacity should be met in the medium and long term"*.

The ANPS confirms that the shortlisting process of the Airports Commission reviewed 52 proposals, which - as evidenced above - included Manston in its capacity as both a passenger airport and as a freight-only operator, and concludes that:

"The Government believes that the Airports Commission has analysed all the options put forward to the appropriate degree of detail, and discounted shortlisted schemes fairly and objectively"

Table

Thanet District Council and Ramsgate Town Council Properties for use by the Community (designated as Communities, Museums & Theatres, Recreational Parks) that Fall within Each of the Noise Contours

No.	Noise Contour⁸	Name of Public Parks and Open Spaces such as recreation grounds churchyards and memorial gardens	Size, Child Facilities and access	UPRN⁹ and Thanet District Council Number¹⁰ and Ramsgate Town Council
1	> 60 dB LAeq (orange)	Nethercourt Touring Park	Campground	10022966759 22
2	> 57 dB LAeq (purple)	Ellington Park Municipal site for general public use Public park laid out in 1892 Recipient of £2 million refurbishment fund ¹¹ Expected to attract 120,000 visitors a year	13 acre park Grass 390 established large trees Flowers Fenced play area for younger children and a physical activity areas for both children and adults Benches Well surfaced access routes suitable for visitors with	10022964393 70

⁸ ⁸ Map showing noise contours commissioned by Five10Twelve Limited and produced by the ERCD of CAA overlayed onto a google map

⁹ <https://www.thanet.gov.uk/wp-content/uploads/2019/01/Transparency-Asset-Report-January-2019-Transparency.pdf>

¹⁰ <https://www.thanet.gov.uk/wp-content/uploads/2019/01/Transparency-Asset-Report-January-2019-Transparency.pdf>

¹¹ <https://www.kentononline.co.uk/thanet/news/park-restoration-works-step-up-207023/>

			pushchairs and/or wheelchairs	
3	> 57 dB LAeq (purple)	ST LAWRENCE BOWLS CLUB Ellington Park		10022964371 296
4	> 57 dB LAeq (purple)	Ellington Park Land		100062100490 73
5	> 57 dB LAeq (purple)	Ellington Park Model Club		1001336769 25
6	> 57 dB LAeq (purple)	Edwardian Ellington Park Bandstand 1892		1001336769 25
7	> 57 dB LAeq (purple)	Ramsgate FC Southwood Stadium Owned by Ramsgate FC(85) Limited Founded in 1886	Grounds maximum capacity of 2,500 Grass	100062281844 572
8	> 57 dB LAeq (purple)	Liverpool Lawn Gardens		10013307478 76
	> 57 dB LAeq (purple)	Foresters Hall Listed building 1811 EastKent Mencap	Provides services for people with a learning disability and their families	100062282959 628

9	> 57 dB LAeq 16 hr (purple)	<p>Spencer Square Gardens</p> <p>Van Gogh sculpture Two blue plaques where Van Gogh lodged and worked when he lived in the town</p>	<p>Public Tennis Courts</p> <p>Well surfaced access routes suitable for visitors with pushchairs and/or wheelchairs</p> <p>Flowers</p>	<p>10006268153</p> <p>75</p>
10	> 57 dB LAeq 16 hr (purple)	<p>Vale Square Community Gardens</p>	<p>Public Events</p> <p>Grass Established large trees</p>	<p>10013308111</p> <p>80</p>
11	> 57 dB LAeq 16 hr (purple)	<p>Royal Harbour Marina</p> <p>Royal Harbour (designated 1821 by HM King George IV) Grade II and Grade II* listed buildings and structures ranging from the Customs House and Clock tower, harbor inner basin walls, Jacob's ladder and Edwardian Eastcliff lift.</p>	<p>Four Gold Anchor Award complex</p> <p>700 finger moorings</p> <p>Well surfaced access routes suitable for visitors with pushchairs and/or wheelchairs</p>	
12	> 57 dB LAeq 16 hr (purple)	<p>Effingham Fire Station Grade II listed status C18 house converted and extended in 1905 under the direction of Borough Engineer T G Taylor to serve as Ramsgate Fire Station</p> <p>Purchased by Ramsgate Town Council in 2019 for use by the community</p>		<p>Ramsgate Town Council</p>
13	> 57 dB	Albion Place Gardens	Benches looking	10022962383

	L _{Aeq} 16 hr (purple)	<p>A designated Registered Park and Garden presence of significant historical technical innovation Albion Place Garden Grade II</p> <p>Five Pulhmite structures on Albion Hill constructed between 1893 and 1936 (Grade II listed status)¹²</p>	<p>out to sea</p> <p>Grass</p> <p>Established large trees</p>	77
14	> 57 dB L _{Aeq} 16 hr (purple)	MADEIRA WALK WATERFALL		10013308127 101
15	> 57 dB L _{Aeq} 16 hr (purple)	<p>Albion Gardens War Memorial to the Great War</p> <p>Memorial is protected and listed on the National Heritage list for England¹³</p>		10013308166 111
16	> 57 dB L _{Aeq} 16 hr (purple)	Ramsgate Sports Centre		200002882279 582
17	> 57 dB L _{Aeq} 16 hr (purple)	ALBERT COURT		200003080360 88
18	> 57 dB L _{Aeq} 16 hr (purple)	La Belle Alliance Square	Play area for younger children	
19	> 57 dB L _{Aeq} 16 hr	Ramsgate Skatepark ¹⁴	Council skatepark	

¹² <https://www.kentononline.co.uk/thanet/news/nine-historic-buildings-granted-listed-status-205635/>

¹³ <https://historicengland.org.uk/listing/the-list/list-entry/1085348>

¹⁴ <https://www.skateparks.co.uk/kent/ramsgate-bowl/>

	(purple)			
20	> 57 dB LAeq 16 hr (purple)	Ramsgate Main Sands	Disabled toilets Disabled access to the beach Seaside Award 2019	
21	> 54 dB LAeq 16 hr (pink)	Boundary Park	Play area for younger children and children Public Basketball courts Grass Established large trees	
22	> 54 dB LAeq 16 hr (pink)	MARINA ESP - FIRST AID OFFICE		10022963904 91
23	> 54 dB LAeq 16 hr (pink)	Arklow Square	Grass Established large trees	
24	> 54 dB LAeq 16 hr (pink)	Grange Road – Amenity Land		10071164837 87
25	> 54 dB LAeq 16 hr (pink)	Victoria Gardens Festival of Britain Fountain Grade II listed status Tollgate kiosk Grade II listed (1876)	Benches looking out to sea Grass Flowers Seafront Shelters looking out to the sea	
26	> 54 dB LAeq 16 hr (pink)	Eastcliff Bandstand (surrounding which is the only open-aired polished dance floor on a cliff top in the world)		10022964393 70

27	> 54 dB LAeq 16 hr (pink)	Warre Recreation Ground Part of the Playing Pitch Strategy ¹⁵ and is protected as a playing field site in the Local Plan	Grass Established large trees Grass Pitches for Adult football Changing Rooms Disabled access	1001336769 25
28	> 54 dB LAeq 16 hr (pink)	GRANVILLE MARINA FOUNTAIN		10013308125 100
29	> 54 dB LAeq 16 hr (pink)	Granville Theatre 1947	Town's sole multi-purpose entertainment venue	100062282470 276
30	> 54 dB LAeq 16 hr (pink)	Royal Esplanade Gardens Ramsgate Croquet Club	Benches looking out to sea Grass Flowers Seafront Shelters looking out to the sea	
31	> 51 dB LAeq 16 hr (yellow)	Westerncliff /Courtstairs		10022966754 64
32	> 51 dB LAeq 16 hr (yellow)	PEGWELL RD - COURTSTAIRS PARK		10013307499 78
33	> 51 dB LAeq 16 hr (yellow)	WESTERN UNDERCLIFF TIDAL POOL		10013308110 98
34	> 51 dB LAeq 16 hr (yellow)	ROYAL ESP - MINIATURE GOLF		10071164952 573
35	> 51 dB LAeq 16 hr	ROYAL ESP - PUTTING GREENS		10071164952

¹⁵ <https://www.thanet.gov.uk/wp-content/uploads/2018/08/Playing-Pitch-Strategy.pdf>

	(yellow)			574
36	> 51 dB LAeq 16 hr (yellow)	ROYAL ESP - BOWLING GREEN		100062628138 575
37	> 51 dB LAeq 16 hr (yellow)	ROYAL ESP - CROQUET CLUB (four excellent full- sized lawns and a clubhouse)		100062628137 576
38	> 51 dB LAeq 16 hr (yellow)	Western Undercliff Beach	Seaside Award 2019 Disabled parking	
39	> 51 dB LAeq 16 hr (yellow)	Eastcliff Promenade and Beach	Disabled parking Disabled access to the beach	

