

To: Secretary of State for Transport
% Planning Inspectorate,
National Infrastructure Planning

Date: 18 November 2021

Our Ref: SoS/R/012

Email: manstonairport@planninginspectorate.gov.uk

For the attention of the Manston Airport Case Team

- A. This submission is in response to the SoSFT's letter of 21 October 2021 and specifically paragraph 6.
- B. We submit our comment to the First Round of Consultation herewith as a formal consultation response to the Second Round of Consultation.
- C. Our comment is in response to the Applicant's submission [[TR020002-005769](#)] (For ease of reference we will be following the Applicant's numbering).
- D. **In response to the Applicant's submission [[TR020002-005769](#)] - Page 1, Paragraph 3 : Need is Important and Relevant**
- We respectfully refer the Secretary of State to our response labelled SoS/R/011 submitted on 16 November 2021 specifically Pages 1-4.
 - We strongly support the submissions of Jenny Dawes [[TR020002-005743](#)] and Ramsgate Town Council [[TR020002-005680](#)] and their subsequent submissions to the 2nd Consultation.
 - We strongly support the [Independent Aviation Assessor Report](#) specifically at Paragraph 4.2.
- E. **In response to the Applicant's submission [[TR020002-005769](#)] - Page 1, Paragraph 4 (a) : New National Policy - Planes and Trains**
- We refer the Secretary of State to our submissions to the First Round of Consultation at [[TR020002-005665-006](#)] and to the white paper Great

British Railways The Williams-Shapps Plan for Rail; a national policy.

- We refer the Secretary of State to our submissions to the First Round of Consultation at [[SoS/R/010 Manston](#)] and to the Airports National Policy Statement ("**Airports NPS**") specifically:


Paragraph 1.12: *"The Airports NPS provides the primary basis for decision making on development consent applications for a Northwest Runway at Heathrow Airport [LHR NWR], and will be an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England¹"; and*

Paragraph 1.42: *"in light of the findings of the Airports Commission on the need for more intensive use of existing infrastructure [...] the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow²"; and*

Paragraph 3.24: *"...expansion at Heathrow Airport delivers the biggest boost in long haul flights, and the greatest benefit therefore to air freight" and that this would be "...further facilitated by the existing and proposed airport development of freight facilities as part of the Northwest Runway scheme³".*

- Again, we respectfully refer the Secretary of State to our response labelled SoS/R/011 submitted on 16 November 2021.
- Again, we strongly support Jenny Dawes [[TR020002-005743](#)] and Ramsgate Town Council [[TR020002-005680](#)] and their subsequent submissions to the 2nd Consultation.

¹ Para 1.12, Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England, June 2018. Available online at:

 (accessed 16 November 2021)

² Para 1.42 *Ibid* (accessed 16 November 2021)

³ Para 3.24 *Ibid* (accessed 16 November 2021)

F. **In response to the Applicant's submission [TR020002-005769] - Page 1,**
Paragraph 4 (b) : No Regional Policy Support

- The Proposed Development is located in East Kent and in the South East.
- We refer the Secretary of State to our submissions to the First Round of Consultation at [TR020002-005665-014] which evidences that there is no support, dependency or mention of the Proposed Development in the:
 - Kent County Council Strategic Delivery Plan (2020-2023)⁴;
 - South East Local Enterprise Partnership ("**SELEP**") Economic and Renewal Strategy 2021⁵. The SELEP Economic Recovery and Renewal Strategy, is based on the emerging draft SELEP Local Industrial Strategy ("**LIS**"), and is - in effect - an interim LIS;
 - South East Local Enterprise Partnership Smarter Faster Together Towards a LIS⁶; and the
 - Growth Infrastructure Framework: A 2050 Picture of Kent and Medway⁷
- Further, the SELEP's strategy, **Working Together for a Faster, Smarter and more Sustainable Economic Recovery**⁸ specifically supports two of London's airports (Southend and Stansted), major ports (Dover, London Gateway and Tilbury, the Haven Ports and Newhaven), two Freeports (Freeport East and Thames Freeport) and the UK's only rail connection to continental Europe⁹.
- The SELEP has invested in a Logistics Centre in South Essex and has

[REDACTED]
(accessed 16 November 2021)

⁵ [REDACTED] (accessed on 16 November 2021)

⁶ [REDACTED]
[REDACTED] November 2021)

⁷ [REDACTED] (accessed on 16 November 2021)

⁸Working Together for a Faster, Smarter and more Sustainable Economic Recovery Available online at:
[REDACTED] (accessed on 16 November 2021)

⁹ Page 4, Working Together for a Faster, Smarter and more Sustainable Economic Recovery Available online at: [REDACTED]
(accessed on 16 November 2021)

invested in the Stansted Airport Training Centre¹⁰.

- Although the Proposed Development is in the South East, the SELEP's strategy, Working Together for a Faster, Smarter and more Sustainable Economic Recovery¹¹ makes no mention nor provides any support (economic or otherwise) for the Proposed Development.

G. **In response to the Applicant's submission [TR020002-005769] - Page 1, Paragraph 4(c) : Proposed Development not in London**

- The Applicant has correctly identified the Proposed Development is outside of London. The Proposed Development is landlocked and not on the River Thames. The Proposed Development is in East Kent.

H. **In response to the Applicant's submission [TR020002-005769] - Page 1, Paragraph 4(d) : Local Policy Under Early Review**

- The Thanet District Council Local Plan ("Thanet Local Plan") was adopted in 2020. However, it is under an early review which will be completed in 2023.
 - Para 1.39 of the Thanet Local Plan states that: If a DCO for Airport use is granted, the early review of the Plan will need to take this into account as well as its implications for other policies in the Plan and consequential land use considerations. In the event that the DCO is not granted or does not proceed, **the Council will similarly need to consider the most appropriate use for the site as part of the early review**¹² (bold added for emphasis).
 - Policy SP07 of the Thanet Local Plan states that – Manston Airport as

¹⁰ Page 16, Working Together for a Faster, Smarter and more Sustainable Economic Recovery Available online at: [REDACTED]

(accessed on 16 November 2021)

¹¹ Working Together for a Faster, Smarter and more Sustainable Economic Recovery Available online at: [REDACTED] (accessed on 16 November 2021)

¹² Paras 1.39 and Policy SP07 Thanet District Council Local Plan Adopted July 2020. Available online at: [REDACTED] (accessed 16 November 2021)

identified on the Policies Map is safeguarded for airport related uses. **Whether or not the DCO is confirmed, the future use and development of Manston Airport and/or other policies affected by the outcome of the DCO process will be determined through the early review of the Plan.**" (bold added for emphasis)

- We support the [Independent Aviation Assessor Report](#) conclusion that the adopted [Thanet] Local Plan does not advance the need case for the development from that presented at Examination¹³.

I. **In response to the Applicant's submission [TR020002-005769] - ANNEX 2 - Planning Policies Affecting Need Including Changes** since 9 July 2020. (For ease of reference we will be following the Applicant's numbering).

J. **In response to the Applicant's submission [TR020002-005769] - Page 6, Paragraphs 1-2 : No Need**

- Please see Paragraphs above.
- We disagree with the Applicant. Since the examination a further 4 independent experts agree that there is **no** Need for Development as evidenced in:
 - a. [ExA recommendation Report](#).
 - b. [Independent Aviation Assessor Report](#)
 - c. [Ramsgate Town Council's independent aviation expert's report](#)
 - d. [Jenny Dawes' independent aviation expert's report](#)

K. **In response to the Applicant's submission [TR020002-005769] - Page 6, Paragraphs 3-5 : Airport NSIP so Lawful Need for Need and that Need to be National**

- We respectfully refer the Secretary of State to our response labelled SoS/R/011 submitted on 16 November 2021 specifically Pages 1-4.
- As you will be aware, the Proposed Development is a Development

¹³ Page 14, paragraph 4.3

Consent Order Scheme and caught by the Prescribed Criteria Under PA 2008. An Airport NSIP requires matters of national significance under statutory law.

- The threshold criteria is set out in Section 23(4) taken together with 23(5)(b), by which an alteration to an airport is to be treated as an NSIP if it is “expected” to “increase by at least 10,000 per year the number of air transport movements of cargo aircraft for which the airport is capable of providing air cargo transport services”¹⁴.
- The threshold criteria was tested in *R (Ross and Saunders (acting on behalf of Stop Stansted Expansion)) v. Secretary of State for Transport* [2020] EWHC 226. The Secretary of State had looked at this question on the basis that it should be determined by reference to the maximum number of passengers the airport was realistically capable of achieving, as opposed to the maximum hypothetical capacity of the airport assuming that all passenger flights would be using the largest aircraft and at full loads, on a 24/7 basis. Dove J. held that this was the correct interpretation of s.23(4)-(5)¹⁵.
- It follows that the cargo threshold criteria should be determined by reference to the maximum number of air transport movements of cargo aircraft the airport is realistically capable of achieving, as opposed to the maximum hypothetical number of air transport movements of cargo aircraft.
- The Quantitative Need for Development determines what is realistically capable of being achieved.
- Whether (or not) there is a Need for Development is important and relevant¹⁶.
- The Secretary of State’s Statement of Matters of 11 June 2021 stated at

¹⁴ Section 23 PA of the 2008 Available online at [REDACTED] (accessed on 11 November 2021)

¹⁵

[REDACTED] (accessed on 11 November 2021)

¹⁶ s105(2) of the Planning Act 2008 (“**PA 2008**”) requires the Secretary of State to have regard to: (a)...(c)) any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State’s decision.

paragraph 9 that *“the Secretary of State has appointed an independent aviation assessor to advise him on matters relating to the need for the Development and to produce a report summarising those findings”*.

- A reasonable person would conclude that the Secretary of State thinks Quantitative Need for Development and specifically changes to demand for air freight, changes to capacity at other airports and locational factors are *“important and relevant to the Secretary of State’s decision”*.

L. **In response to the Applicant's submission [TR020002-005769] - Pages 6 and 7, Paragraphs 6-9(a-g) : Proposed Development is a Development Consent Order Scheme, Involving An Unused Airfield And Cargo-Led Proposal**

- We respectfully refer the Secretary of State to our response labelled SoS/R/011 submitted on 16 November 2021 specifically that -
 - We respectfully draw the Secretary of State's attention to Paragraph 17 of the [Stansted Decision Letter](#) which specifically makes reference to Manston Airport and specifically differentiates Manston Airport from MBU airports.
 - Paragraph 17 in its entirety states:

“17. MBU builds upon the APF, again referencing work undertaken by the Airports Commission which recognised the need for an additional runway in the South East by 2030 but also noted that there would be a need for other airports to make more intensive use of their existing infrastructure. On this basis, MBU states that the Government is supportive of airports beyond Heathrow making best use of their existing runways. There is no requirement flowing from national aviation policy for individual planning applications for development at MBU airports, such as Stansted, to demonstrate need [Notwithstanding conclusions in relation to Manston Airport, which is not comparable to the current proposal (being a Development Consent Order scheme, involved an unused airfield and was a cargo-led proposal rather than passenger)] for their Proposed Development or for

associated additional flights and passenger movements. This was not disputed by the Council and whilst SSE took a contrary view, even its witness accepted that there was a need for additional capacity within the London airport network, beyond any new runway at Heathrow¹⁷" (bold added for emphasis) .

M. **In response to the Applicant's submission [TR020002-005769] - Page 8, Paragraph 9(h) : Slow/ Lesser Forecasts Just Means Harm**

- The Applicant has asserted that if such forecasts are slow to be achieved then lesser and/or slower harm would be caused but an examination of 'tipping points' has not taken place by either the Applicant or the ExA¹⁸ or the Secretary of State; ie: At what point does the cost and/or harm of the Proposed Development at any stage from initial construction onwards become outweighed by the alleged benefits it may (or may not) deliver?
- Typically the environmental costs of construction are mitigated across the whole operational life cycle of the infrastructure project. In this case there is no need for the airport therefore the operational lifecycle will be at best significantly curtailed if not completely non-existent.
- The Applicant assumes that costs and/or harm only starts when (or if) the airport comes into operation. This is an inaccurate and unevidenced assumption.
- By way of example the Applicant, ExA or the Secretary of State has not examined the cost and/or harm associated with the following issues:
 - The Revised Construction Environment Management Plan¹⁹ does not quantify the environmental impact.
 - Harm to local area and/or residents and/or business including but

¹⁷ Available online at:

[REDACTED] (accessed 16 November 2021)

¹⁸ Paras 6.3.212; and 8.2.94

[REDACTED] (accessed on 15 November 2021)

¹⁹ Available online at:

[REDACTED] (Accessed on 12 November 2021)

not limited to tourism in terms of construction noise impacts, air quality impacts etc.

- Environmental cost of embodied carbon of construction materials.
 - Construction works, not completed due to insufficient funds and/or a lack of demand.
 - Only some construction works completed due to insufficient funds and/or a lack of demand.
 - Highway works not completed due to insufficient funds and/or a lack of demand.
 - Only some highway works completed due to insufficient funds and/or a lack of demand.
 - Impact of infrastructure changes made for the Proposed Development that are no longer of use and may not fit with the Local Authority Highways and Transport plans but still require ongoing maintenance which must be met by the public purse.
 - Cost to the Thanet District Council which has stated that the Proposed Development will significantly impact the Local Plan.
 - The opportunity cost of the loss of a brownfield site as works are not completed due to insufficient funds and/or a lack of demand;
 - The sterilisation of a brownfield site as works are not completed due to insufficient funds and/or a lack of demand; and/or
 - The Airport not coming into operation due to insufficient funds and/or a lack of demand or due to identified operational risks (HRDF, no airspace or aerodrome certificate). It is of note that the ExA concluded that operational matters weigh moderately against the case for development consent being given²⁰.
- The Applicant assumes that costs and/or harm only starts when (or if) the airport comes into operation. This is an inaccurate and unevidenced

²⁰ Para 8.2.176

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed on 15 November 2021)

assumption. By way of example the ExA did examine the cost and/or harm associated with some of the following construction and destruction issues:

- Harm to non-designated assets such as the T2 Hangar and WWII Dispersal Bay. At para 6.3.188 of the ExA Recommendation Report it states that: "...however, it was of the view that due to the inadequate surveying it was not possible to decide whether buildings have such importance and note that **the [Airports NPS] states that impact of development on heritage assets should be avoided or minimised and that once lost heritage assets cannot be replaced**"; and
- That Thanet District Council confirmed its view in the examination that: "...whilst the proposed development may bring further tourists to the area, the **amenity impacts from the construction and operation of the proposed development may adversely affect the tourism industry in Ramsgate and the wider Thanet area and weigh against any proposed benefit**²¹." (bold added for emphasis).

N. **In response to the Applicant's submission [TR020002-005769] - Page 8, Paragraph 9(i) : No Relevance**

- These paragraphs have no relevance to this DCO application as they seem to have been taken from the Stansted application. However, it does highlight that the Applicant does not have secure prospective investors.
- Following recent case-law²², the Applicant cannot rely on a local benefit.

O. **In response to the Applicant's submission [TR020002-005769] - Page 8, Paragraph 9(j) : No Need**

- Since the examination a further 4 independent experts agree that there is

²¹ Para 6.10.121

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed on 15 November 2021)

²² Paras 50 and 119 of [REDACTED]

no Need for Development as evidenced in:

- [ExA recommendation Report.](#)
- [Independent Aviation Assessor Report](#)
- [Ramsgate Town Council's independent aviation expert's report](#)
- [Jenny Dawes' independent aviation expert's report](#)
- As you will be aware the Airports NPS has been reinstated and in May 2021, Heathrow Airport Ltd reopened a property hardship scheme through which it buys homes from owners who are otherwise unable to sell them due to the prospect of the runway²³.
- It has been reported that a third runway is seen as crucial to restore Heathrow's financial performance in the longer term and Ferrovial, the airport's biggest shareholder, has hinted that it could sell its stake if it cannot increase its returns²⁴.
- Heathrow published its Q3 2021 results on 26 October 2021²⁵. It states on Page 6:

"Expansion developments

Currently, our focus is on working to safely restart international travel and trade to help kickstart the UK's economic recovery. However, when demand returns to pre-COVID levels, meeting that demand as the UK's hub airport will be essential to a country with global and levelling up ambitions. We will continue to consult with investors, Government, airline customers and regulators on our next steps".

P. **In response to the Applicant's submission [TR020002-005769] - Page 8, Paragraph 9(k) : No Case for Development Consent**

- The ExA Recommendation Report concluded:

²³ [REDACTED] (accessed 16 November 2021)

²⁴ [REDACTED] (accessed 16 November 2021)

²⁵ [REDACTED]
(accessed 16 November 2021)

“8.3. THE CASE FOR DEVELOPMENT CONSENT²⁶

8.3.1. The ExA has found that the Proposed Development will result in demonstrable benefits in terms of socio-economic matters. The ExA considers that only moderate weight should be afforded to such benefits for the reasons that have been set out above 8.3.2. On the other hand, the ExA has found that: The Applicant's failure to demonstrate sufficient need for the Proposed Development, additional to (or different from) the need which is met by the provision of existing airports, is important and relevant against the case for development consent being given; the impacts on climate change of the Proposed Development weigh moderately against the case for development consent being given; the impacts on heritage assets of the Proposed Development weigh moderately against the case for development consent being given; the impacts of noise and vibration resulting from of the Proposed Development weigh moderately against the case for development consent being given; operational matters weigh moderately against the case for development consent being given; and matters related to traffic and transport weigh substantially against the case for development consent being given.

8.3.3. The ExA has found that there would not be unacceptable impacts in terms of air quality; biodiversity; ground conditions; landscape, design and visual impact; and water resources.

8.3.4. The ExA considers that when these factors are weighed against each other, either individually or in combination, the identified impacts of the Proposed Development are not outweighed by the benefits.

8.3.5. Given this, the ExA concludes that a case for development consent has not been demonstrated”.

Q. **In response to the Applicant's submission [TR020002-005769] - Page 9,**

²⁶ Para 8.3

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed on 16 November 2021)

Paragraph 11 : No Regional Policy Support

- The Proposed Development is located in East Kent and in the South East.
- The Proposed Development is not referenced or even mentioned in any Regional Policy document, including the Kent County Council Interim Strategic Plan.
- Please see Paragraph F above and Paragraphs S and T below.

R. **In response to the Applicant's submission [TR020002-005769] - Page 9,**

Paragraph 12-13 : Local Area Employment Levels

- The Proposed Development is located in East Kent and in the South East.
- The Applicant has defined local labour as those living within a 90-minute commute of the Proposed Development, this is based on research by the Impact Assessment Unit at Oxford Brookes University which defined home-based workers as living within a 90-minute commute zone²⁷. This would extend the Local Area to London and to the South East LEP (Essex²⁸ or East Sussex²⁹ or even Stansted Airport³⁰).
- South East LEP Annual Report 2020-2021 states that:
 - Unemployment as % of economically active population (March 2021)

²⁷ Page 34 [TR020002-004664]

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004664-Updated%20Register%20of%20Environmental%20Actions%20and%20Commitments%20\(tracked\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004664-Updated%20Register%20of%20Environmental%20Actions%20and%20Commitments%20(tracked).pdf) (accessed on 17 November 2021)

²⁸

at 4.4% compared with the UK's 4.6%³¹.

- Claimant rate as % of population aged 16 to 64 (September 2021) at 4.6% compared with the UK's 5%³²;
- Working age skills levels of population aged 16-64 at 37.3% at Level 4 Qualification and above (UK: 43%)³³ and 77.1% at Level 2 qualification and above (UK: 78%)³⁴; and
- Apprenticeship starts in 2020/21 academic year to April of 17,730³⁵.
- The Applicant's Proposed Development at Manston is not included or even mentioned in the South East LEP 2021 Annual Report or in any of its current strategies or growth plans.
- The South East LEP has identified only 4 areas of "major growth, major opportunity" - Ebbsfleet Garden City, Lower Thames Crossing, Thames Freeport and London Resort³⁶.
 - All of which are located within the Applicant's definition of Local ³⁷jobs.
 - As of today's date, there are 441 apprenticeships within 40 miles of Ramsgate. There is no a function to search for a 90-minute commute as defined as the local area³⁸.
 - Construction and Transport and Logistics are identified as areas

³¹ Page 14 South East Local Enterprise Partnership Annual Report Updated July 2021 Available online at:

(accessed on 16 November 2021)

³² *Ibid*

³³ *Ibid*

³⁴ *Ibid*

³⁵ *Ibid*

³⁶ Pages 22-23

³⁷ The Applicant has defined local labour as those living within a 90-minute commute of the Proposed Development, this is based on research by the Impact Assessment Unit at Oxford Brookes University which defined home-based workers as living within a 90-minute commute zone. See Page 34 [TR020002-004664]

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004664-Updated%20Register%20of%20Environmental%20Actions%20and%20Commitments%20\(tracked\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004664-Updated%20Register%20of%20Environmental%20Actions%20and%20Commitments%20(tracked).pdf) (accessed on 16 November 2021)

³⁸

(accessed 17 November 2021)

which have particularly high relative concentrations of employment.³⁹

- Currently there are 105,855 Construction Employees in the South East LEP area. **This is 38% above the national average⁴⁰.**
- Currently, there are vacancies in construction in the South East LEP:
 - **30,378** unique job postings; and
 - **154,874** total postings⁴¹.
- As of today's date, according to the DWP there are 1,524 construction jobs vacancies in South East England. There are 370 construction jobs vacancies in Kent⁴².
- There is not a shortage of Construction jobs in the local area.
- There are 43,000 vacancies over a year in Transport and Logistics in the local area⁴³.
- As of today's date, according to the DWP there are 900 logistics jobs vacancies in South East England. There are 145 logistics jobs vacancies in Kent⁴⁴.
- As of today's date, according to the DWP there are 2,709 transport jobs vacancies in South East England. There are 577 transport jobs vacancies in Kent⁴⁵.

³⁹ Page 4, Working Together for a Faster, Smarter and more Sustainable Economic Recovery Available online at: [REDACTED]

(accessed on 16 November 2021)

⁴⁰Page 31 South East Skills Construction, South East Careers Magazine from the South East LEP Published on 8 October 2021 Available online at:

[REDACTED]
(accessed on 16 November 2021)

⁴¹ Page 31 South East Skills Construction, South East Careers Magazine from the South East LEP Published on 8 October 2021 Available online at:

[h](#) [REDACTED]
(accessed on 16 November 2021)

⁴² [REDACTED] (accessed on 16 November 2021)

⁴³ Page 36 South East Skills Construction, South East Careers Magazine from the South East LEP Published on 8 October 2021 Available online at:

[REDACTED]
(accessed on 16 November 2021)

⁴⁴ [REDACTED] (accessed on 16 November 2021)

⁴⁵ [REDACTED] (accessed on 16 November 2021)

- There is not a shortage of Transport and Logistics jobs in the local area.
- As of today's date, according to the DWP there are 1,979 hospitality jobs vacancies in South East England. There are 281 hospitality jobs vacancies in Kent⁴⁶.
- There is not a shortage of Hospitality jobs in the local area.

S. **In response to the Applicant's submission [TR020002-005769] - No Regional Policy Support - Skills**

- The Proposed Development is located in East Kent and in the South East.
- The South East Local Enterprise Partnership ("**SELEP**") **Local Skills Report (March 2021)**⁴⁷ makes no mention of the Proposed Development. The SELEP Skills Report refers to the SELEP's "two airports", (Stansted and Southend), and includes details of the Stansted Airport College, supported by the SELEP with £3.5m of public funding. While the Applicant perhaps may argue that they have not been included since they are still awaiting a DCO decision, this clearly is not the issue since London Resort and Lower Thames Crossing, (which are both yet to even submit their DCO applications), are included.
- The SELEP Skills Advisory panel established the **South East Skills Major Projects Group**:⁴⁸
*"bringing together some of the **large infrastructure projects and which will clearly have an impact on the skills and employment landscape***⁴⁹"
- The South East Skills Major Projects Group does **not include the Proposed Development** but does include the: Ebbsfleet Garden City⁵⁰;

⁴⁶ [REDACTED] (accessed on 16 November 2021)

⁴⁷ South East LEP (SELEP) Local Skills Report (March 2021) Available online at:

[REDACTED]
 (accessed on 16 November 2021)

⁴⁸ South East Skills Major Projects Group Available online at:

[REDACTED]
 (accessed on 16 November 2021)

⁴⁹ Page 5 South East LEP (SELEP) Local Skills Report (March 2021) Available online at:

[REDACTED]
 (accessed on 16 November 2021)

⁵⁰ [REDACTED] (accessed 16 November 2021)

Lower Thames Crossing⁵¹; London Resort⁵²; Public Health England Harlow⁵³ located near Stansted airport; Bradwell B⁵⁴; Stansted Airport Growth⁵⁵; Hoo Peninsula; Thames Freeport⁵⁶; and Freeport East⁵⁷.

- The Kent & Medway Skills Commission (KMSC) is a sub-group of the [REDACTED] (KMEP), works closely with the SELEP and reports into the regular KMEP meetings.
- A search of the [REDACTED], dating back to January 2019 up to and including the most recent meeting in September 2021. Makes very few references to either "Manston", "Riveroak or RSP" - most references are in relation to Operation Brock and Operation Fennel. The first mention in any kind of skills context does not appear until May 2021 - as follows:
 - [REDACTED]: Minor reference in relation to Thanet Parkway Train Station ("TPTS") - a passenger railway station - attracting high-skilled workers to Thanet, housing and funding shortfalls(p.18⁵⁸ and p.33⁵⁹);
 - [REDACTED]: Minor reference to Manston with regards to uncertainty surrounding TPTS, Thanet District Council Local Plan and

⁵¹ [REDACTED] accessed 16 November 2021)

⁵² [REDACTED] (accessed 16 November 2021)

⁵³

[REDACTED] (accessed 16 November 2021)

⁵⁴ [REDACTED] (accessed 16 November 2021)

⁵⁵ [REDACTED] (accessed 16 November 2021)

⁵⁶ [REDACTED] (accessed 16 November 2021)

⁵⁷ [REDACTED] (accessed 16 November 2021)

⁵⁸ Page 18 "Bob Bayford spoke in favour of Thanet Parkway. He believes it has the potential to be the most transformational project on the list, and its benefits will stretch beyond Thanet to Dover and Canterbury districts. It will allow individuals to access London in under an hour. This will help attract high-skilled workers to Thanet. It will help the number of business parks (including Discovery Park) that are in the area, all of 19 which aspire to grow. There is a DCO process going through currently for Manston Airport; if it is agreed, then the station will be conveniently situated to transport the passengers. Thanet District Council believes that Thanet Parkway will be the impetus to accelerate the Thanet Local Plan, and the housing delivery that the area needs".

⁵⁹ Page 33 "Further work has also been carried out to establish whether investment in the car park at the new station (with its income servicing a loan) would be viable. The use of developer contributions was also considered, although the uncertainty surrounding the Thanet Local Plan and the former Manston Airport site mean that confirmation of any significant contributions would be beyond the timescales required by SELEP to achieve business case sign off"

funding shortfalls (p.8⁶⁰);

- [REDACTED]: (including draft SELEP transport strategy). Minor reference to Manston with regards to uncertainty surrounding TPTS, Thanet District Council Local Plan and funding shortfalls (p.42⁶¹). The only other areas where "Manston Airfield" is mentioned is in relation to its potential use as a lorry park and Operation Brock. (p.6⁶², p.7⁶³ and para 6.9⁶⁴);
- [REDACTED]: Including draft Local Industrial Strategy ("LIS") Minor reference to Manston with regards to uncertainty surrounding TPTS, Thanet Local Plan and funding shortfalls (p.58⁶⁵). It is of note that the draft LIS mentions only Stansted and Southend Airports only in terms of infrastructure/transport assets and connectivity.
- [REDACTED]: Including "[REDACTED]" Strategy ("BCPS"). There is no mention of the Proposed Development.
- [REDACTED]: Brief mention of Manston in relation to the initial granting of the DCO (since quashed) (p.5⁶⁶).
- [REDACTED]: This meeting included a [REDACTED] on its developing DCO application. The Manston site is mentioned as one

⁶⁰ "The use of developer contributions was also considered, although the uncertainty surrounding the Thanet Local Plan and the former Manston Airport site mean that confirmation of any significant contributions would be beyond the timescales required by SELEP to achieve business case sign off".

⁶¹ "The use of developer contributions was also considered, although the uncertainty surrounding the Thanet Local Plan and the former Manston Airport site mean that confirmation of any significant contributions would be beyond the timescales required by SELEP to achieve business case sign off".

⁶² "Non-compliant HGVs wishing to exit the UK If a driver has incorrect paperwork, they may be asked to divert to a holding area at Ashford or Manston where the driver will get advice on how to get border ready. Failure to comply with instructions may result in fines (up to £300) and further delays".

⁶³ "Phase 3 – If phase 2 becomes full, lorries heading for Port of Dover will be directed to Manston Airfield, while the M20 will be used to hold Eurotunnel destined HGVs only. Traffic lights on the A256 after Manston Airfield will help to manage traffic arriving at the Port of Dover".

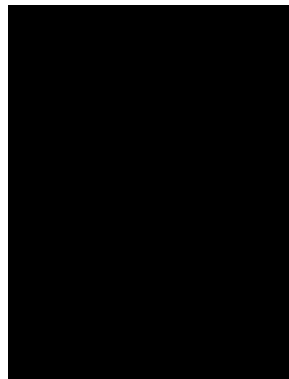
⁶⁴ "Barbara Cooper explained that Central Government has significantly accelerated the pace of Brexit planning since July 2019. There is now a national communications campaign on gov.uk, and information pop-ups around country to give details to lorry drivers. There will be three additional customs stations in Kent (on top of the existing Dover Western Docks and Stop 24 at Folkestone); these extra custom stations are at Ashford truck stop, Manston, and Ebbsfleet car park D. However, the recruitment of sufficient custom agents is behind schedule".

⁶⁵ "The use of developer contributions was also considered, although the uncertainty surrounding the Thanet Local Plan and the former Manston Airport site mean that confirmation of any significant contributions would be beyond the timescales required by SELEP to achieve business case sign off".

⁶⁶ "The Development Consent Order for Manston Airport has been granted by the Secretary of State".

of five sites in Kent for Inland Border Facilities (p.5⁶⁷) and in relation to Operation Fennel (p.5⁶⁸) and para 7.4⁶⁹. The meeting also included a presentation regarding the KEMP Digital Skills panel and details of members of its [REDACTED]. This group includes Stansted Airport, but **not** the Applicant.

- [REDACTED]: Including a presentation on the [REDACTED] project and a presentation of the Workforce Skills Evidence Base. If approved, the Lower Thames Crossing will be one of the largest infrastructure projects in the country, creating an estimated 22,000 jobs during the construction phase⁷⁰. The Skills Evidence Base report includes mention on page 30 of "*proposals to redevelop Manston*" being "*under review*".
- By contrast, Proposed Development of Rochester Airport and Innovation Park is mentioned and supported on numerous occasions, as follows:



cluding [REDACTED]

T. In response to the Applicant's submission to [TR020002-005769] - Page 9, Paragraph 13 : No Regional Policy Support - Infrastructure

- The Proposed Development is in the South East.

⁶⁷ "HMG has secured five sites in Kent for Inland Border Facilities – Sevington, Waterbrook, Ebbsfleet, Manston and 'the Dover' site"

"Manston will be used as an Inland Border Facility if Port of Dover Traffic is diverted when the M20 is nearing capacity due to Operation Brock".

⁶⁸ "If the M20 is reaching capacity due to Operation Brock, Dover bound HGVs will be diverted to Manston. Manston can hold 4,000 HGVs, with an additional 300 held at the 'Dover' location".

⁶⁹ "Recognise Manston Airport as only a temporary solution".

⁷⁰ Page 30 [REDACTED] (accessed on 16 November 2021)

- The South East Local Enterprise Partnership (“**South East LEP**”) Annual Report published 3 November 2021⁷¹ identified a number of priority infrastructure projects in the region:
 - South East LEP infrastructure projects identified include but are not limited to: Kent and Medway Medical School project completion date Summer 2021⁷²; Southend Airport Business Park⁷³; and Riding Sunbeams Solar Railways⁷⁴.
 - It does **not** mention the Proposed Development.

U. **In response to the Applicant's submission [TR020002-005769] - Page 9, Paragraph 14 : 7 Existing Airports Serve London**

- Existing airports serving London include but are not limited to London Heathrow Airport, London Stansted Airport, Southend Airport, London City Airport, London Gatwick Airport, Luton and London Biggin Hill.
- At least 5 of these airports have expansion or development plans in addition to the Airports NPS. Currently, the promise of expansion is secondary to the need to survive.

V. **In response to the Applicant's submission [TR020002-005769] - Page 9, Paragraph 15 : 2-3 hours HGV travel time**

- The location of the Proposed Development is a 2-3 hours **HGV** travel time from London⁷⁵.

⁷¹ Available online at:

(accessed on 16 November 2021)

⁷² Project output: The first medical school in Kent located at Canterbury Page 6 South East Local Enterprise Partnership Annual Report Available online at:

(accessed on 16 November 2021)

⁷³ Page 7 South East Local Enterprise Partnership Annual Report Updated July 2021 Available online at:

(accessed on 16 November 2021)

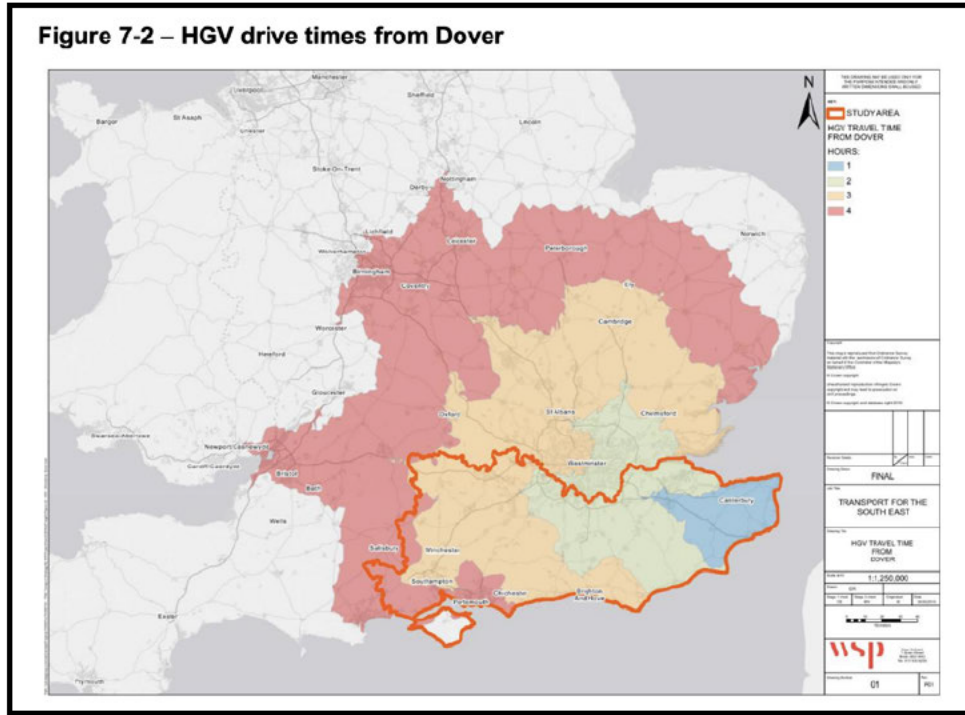
⁷⁴ Page 9 South East Local Enterprise Partnership Annual Report Updated July 2021 Available online at:

(accessed on 16 November 2021)

⁷⁵ Figure 7-2 Transport for South East Freight, Logistics and Gateway Review Available online at:

(accessed 15 November 2021)

Figure 7-2 – HGV drive times from Dover



- Although the map above is of Dover port (a more centrally located port than the Proposed Development) it does evidence that the Proposed Development is a 2-3 hours HGV travel time from London⁷⁶. The Port of Dover is a 45 minute journey by car (longer by HGV) in a direction away from London to the Proposed Development which is located in the extreme right hand bump and tip.

W. In response to the Applicant's submission [TR020002-005769] - Page 9, Paragraphs 15-16 : Thanet Parkway Train Station

- The new Thanet Parkway Train Station ("TPTS") is a passenger station. It has been developed on the Passenger Demand Modelling report (Peter Brett Associates)⁷⁷.
- As you can see from the map below, the Proposed Development is not

⁷⁶ Figure 7-2 Transport for South East Freight, Logistics and Gateway Review Available online at: [REDACTED] (accessed 15 November 2021)

⁷⁷ Available online at:

[REDACTED] (accessed on 12 November 2021)

accessible from and to the area identifying Thanet Parkway [TPTS] by any other means than by car or bus.

- It is therefore clearly inaccurate and wilfully misleading for the Applicant to state to the Secretary of State that: “ ... the new Thanet Parkway station [TPTS] next to the airport that is now under construction⁷⁸”.



- The ExA identified in the examination⁷⁹ that the distance from or to the Proposed Development is such that it would require a shuttle bus service

⁷⁸ Page 9, para 15, line 3

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005769-Applicant's%20Submission%20for%20the%20re-determination%20of%20the%20Manston%20Application.pdf> (accessed 18 November 2021)

⁷⁹ Para 6.11.147

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed on 12 November 2021)

from and to TPTS.

- The SELEP Accountability Board in February 2020⁸⁰ states that the intended benefits of the TPTS include: Accelerating the pace of housing delivery in Thanet; Positively contributing to economic growth by attracting higher skilled workers to the area; Stimulating the creation of additional jobs by encouraging business location and expansion decisions based on the existence of the new station and journey times to London of around 1 hour; Generating over 50,000 new rail journeys from first full operational year (2023) reducing reliance on less sustainable modes of travel; Provision of improved rail access from Thanet to London, offering a reduced travel time of approximately one hour; Providing commuters with alternative access to the area of journeys that might otherwise be made on the local and strategic highway network, thereby contributing to a reduction in congestion; and Providing sustainable access options to the station, including provision for Electric Vehicles, pedal cyclists, pedestrians and bus users.
- There is **no** mention of the Proposed Development or of any rail freight services.

X. **In response to the Applicant's submission [TR020002-005769] - Page 9, Paragraphs 15-16 : No Rail Freight**

- The Proposed Development, located in East Kent, is also not located near any rail freight routes⁸¹.
- The Kent Area Route Study, which underpins the Kent Rail Strategy 2021-2031, clearly sets out the existing series of freight routes and terminals serving Kent. There are a small number of approved rail freight routes in Kent, providing a guaranteed number of freight paths each operating day. These are indicated in blue on the route map below.
- The Applicant's Proposed Development located near Ramsgate in East

⁸⁰ Pages 40-70 Available online at:

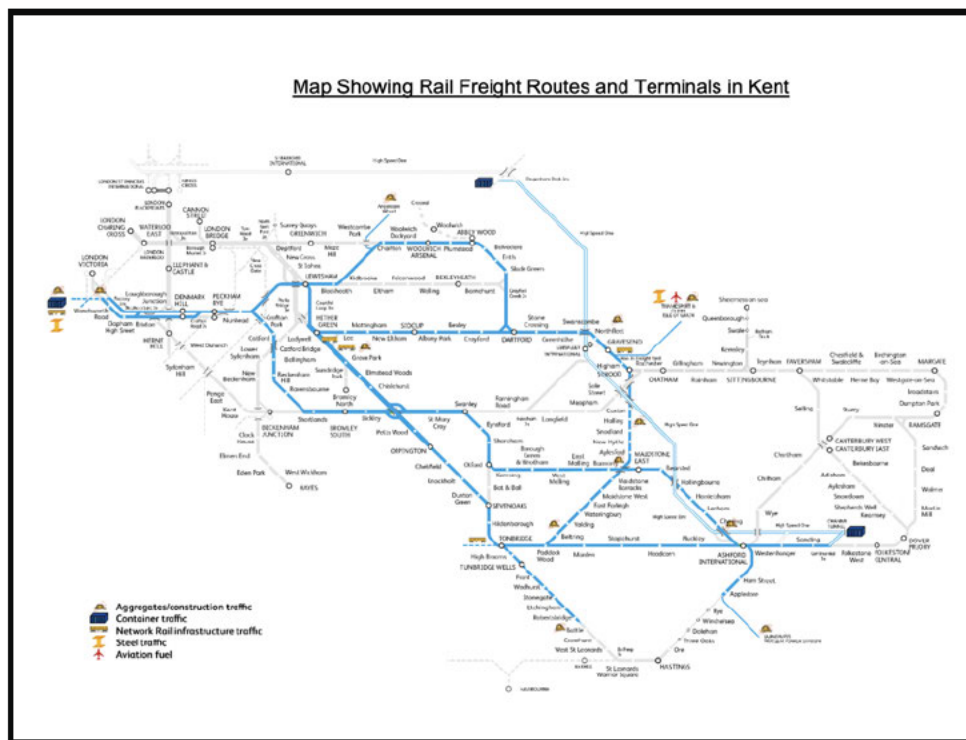
[h](#)

(accessed on 17 November 2021)

⁸¹ [TR020002-005665-006] (accessed on 12 November 2021)

Kent (on the far right of the map below on a light grey line) is clearly not on or near a blue/ approved rail freight routes line⁸².

- The TPTS is not identified on the map below but it is located an equidistance between Minster and Ramsgate station on a light grey line. As you will be aware, rail freight paths are in blue.
- It is therefore clearly inaccurate and wilfully misleading for the Applicant to state to the Secretary of State that: “ Additionally, there is now scope for freight to also be transferred by rail from the new Thanet Parkway station [TPTS]...⁸³”.



- Further, we refer the Secretary of State to our submission to the First Round of Consultation at [TR020002-005665-006] and reiterate that given the absence of any Strategic Rail Freight Interchange (“SRFI”)

⁸² Pages 50-51 Kent Rail Strategy 2021 Available online at:

[REDACTED] (accessed on 12 November 2021)

⁸³ Page 9, para 15, line 3

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005769-Applicant's%20Submission%20for%20the%20re-determination%20of%20the%20Manston%20Application.pdf> (accessed 18 November 2021)

nearby the Proposed Development, the absence of any plans to develop an SRFI within the 30 year lifespan of the Transport Strategy for the South East or the 10 year lifespan of the Kent Rail Strategy, the location of rail freight routes in Kent, it is clear that the Proposed Development at Manston would be in breach of the statutory duty set out in The Williams-Shapps Plan for Rail to promote rail freight to secure economic, environmental and social benefits to the nation.

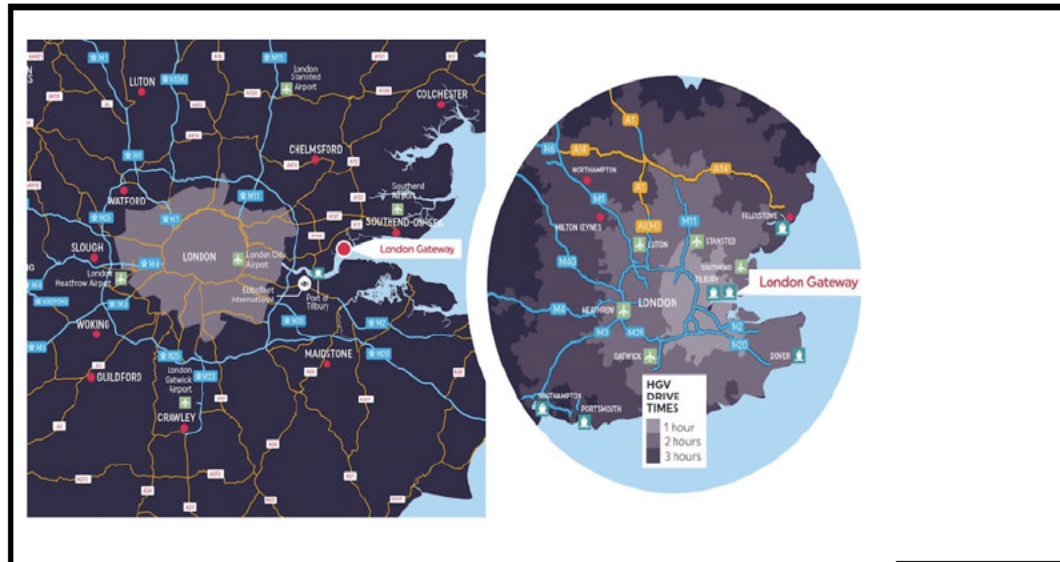
- Since the examination and the First Round of Consultation - and therefore its impact has not been examined - as of September 18, 2021, a new cross-Channel freight service will be open to all transporters, using an unaccompanied mode through the Channel Tunnel (a blue box on a blue line on the above map). The crossing will be managed by Eurotunnel Le Shuttle Freight and will operate 24 hours a day and six days per week. Departures will be from the Group's two terminals in Calais or Folkestone. The capacity will be 8,300 trailers per year. The Eurotunnel Border Pass will allow transporters to speed up the border crossing by digitising their administrative exchanges with the border authorities⁸⁴.

Y. **In response to the Applicant's submission [TR020002-005769] - Pages 9/10, Paragraphs 15- 16 : Slow Way to Water**

- It is clear that the Applicant is unaware of the situation on the ground. The Proposed Development is landlocked and not on the River Thames or by the sea.
- The Applicant is not the owner of the Port of Ramsgate nor is it in any position to proffer or infer any integrated freight handling services with the port, nor are any such services any part of the Applicant's Proposed Development or DCO submission and therefore were not examined at any stage, whether for viability, transport assessment or for environmental impact.
- The London Gateway is some distance from Ramsgate (not identified on

84

the map and in the extreme right hand bump and tip, to the right of Dover on the map) as shown below⁸⁵:



- During the examination and to date, there has been no environmental or transport assessment of this new proposal.
- During the examination and to date, the Applicant has not identified or provided evidence of a need or demand or requirement for airfreight that would:
 - arrive by air at the Proposed Development - then be
 - Unloaded off a plane - then be
 - loaded on to an HGV - then be
 - transported by HGV over 5 miles by road - then be
 - unloaded off the HGV - then be
 - loaded onto an unidentified water vehicle - then be
 - transported over 53 nautical miles to a London Port say for example Port of Tilbury taking at least 5 hours at sea⁸⁶ - then be
 - unloaded off the unidentified water vehicle - then be
 - loaded back onto a road vehicle for delivery.
- During the examination and to date, the Applicant has not identified or provided evidence of a need or demand or requirement or logic for

■ [REDACTED]

■ [REDACTED] (accessed on 12 November 2021)

airfreight that would:

- arrive by sea at a London Port - then be
 - unloaded off a tanker - then be
 - loaded onto another unidentified water vehicle - then be
 - transported over 53 nautical miles from say for example Port of Tilbury taking at least 5 hours at sea⁸⁷ by an unidentified water vehicle to the Port of Ramsgate - then be
 - unloaded off the unidentified water vehicle - then be
 - loaded back onto a HGV - then be
 - transported by HGV over 5 miles by road to the Proposed Development - then be
 - unloaded off the HGV - then be
 - loaded onto a plane to fly somewhere else.
- Since the examination, the Thames Freeport has been announced. The Thames Freeport includes the Thames Enterprise Park which is the UK's first true logistics super-hub⁸⁸ and DP World London Gateway Logistics Park⁸⁹, DP World London Gateway Port⁹⁰ as well as the Port of Tilbury⁹¹.
 - The Thames Freeport is open for business after the Government announced on 3 March that it would be London and South East's freeport⁹².
 - During the examination and to date, the impact of Thames Freeport (or any of the Freeports including but not limited to the East Midlands Airport Freeport⁹³) and a landmark post-BREXIT tax change to attract more of the world's largest shipping companies to the UK shores which was announced at the latest Budget and Spending Review has not been examined. This new evidence will negatively impact the Proposed Development.

⁸⁷ *Ibid*

- During the examination and to date, no evidence has been provided by the Applicant of discussions with Port of London Authority, the Thames Estuary Growth Commission, Thames Gateway Kent Partnership and the University of Kent.
- It is of note that one of the stakeholders that the Applicant claims to be “*in the processing of discussing*” with has closed down as of 31 March 2021⁹⁴.
- When asked the Thames Estuary Growth Board confirmed the minimal extent of these discussions, as follows:

“In respect of Manston Airport and our interactions with Riveroak Strategic Partners Limited and associated companies, we have maintained an ongoing interest in the proposal as you would expect and will continue to monitor developments. RSPManston have also participated in consultations on Thames Estuary workstreams⁹⁵”

Most national significant infrastructure businesses would not call participating in consultations on Thames Estuary workstreams as “*in the process of discussing*”.

- The Applicant has correctly identified that water transport is recognised as one of the most sustainable modes for freight, particularly for low-value, non-time-critical bulk movements.
- However, the Applicant's application is for a cargo airport and air freight. Air freight is used for high-value, time critical movements (ie the exact opposite to water transport).

Z. In response to the Applicant's submission [TR020002-005769] - Page 10/11 Paragraphs 17-21 : Brownfield Site

- The review of the adopted Thanet District Council Local Plan will be

■ [REDACTED] /

⁹⁵ Email received from Thames Estuary Growth Board on 6 August 2021 at 11.12AM in response to a FOI request

completed in 2023.

- The Proposed Development is a brownfield site.
- The New Settlement mitigation study⁹⁶ recommended a number of measures that could make a settlement more sustainable and also carried out an assessment of potential new settlement sites. It was concluded that the former Manston Airport (the Proposed Development site) represented the most appropriate site due to its size and nature as a brownfield site⁹⁷.
- Further, the (Jentex) former Fuel Depot which is an additional part of the Proposed Development is a brownfield site. It would deliver between 8-20 dwellings⁹⁸. By redeveloping brownfield land, pressure would be lifted from other sites that retain a greater greenfield, agricultural and/or biodiversity value to the district.
- The previous owner of the site Stone Hill Park (who has a covenant with the Applicant for housing as part of its sale conditions) had a mixed use development lodged with the Thanet District Council planning department⁹⁹.
- The adopted Thanet District Council Local Plan 2020¹⁰⁰ states at:
Para 1.38 The Council recognises that proposals are being put forward by RiverOak Strategic Partners for an airport operation at the site, through a Proposed Development consent order (DCO), pursuant to the Planning Act 2008. The application is before the Secretary of State for

⁹⁶ Thanet District Council New Settlement Mitigation Study Summary Report 11 November 2016 Available online at:

[REDACTED] (accessed on 15 November 2021)

⁹⁷ Page 1 Thanet District Council Thanet Local Plan Revised Options Sustainability Appraisal June 2018 Available online at:

[REDACTED] (accessed on 15 November 2021)

⁹⁸ Page 122 Sustainability Appraisal Addendum Report Issue 4| 3 October 2019 Available online at:

[REDACTED] (accessed on 15 November 2021)

⁹⁹

[REDACTED] (accessed 18 November 2021)

¹⁰⁰ Paras 1.38, 1.39 and Policy SP07 Thanet District Council Local Plan Adopted July 2020. Available online at:

[REDACTED] (accessed 15 November 2021)

consideration and the proposals are subject to thorough scrutiny as part of this process. A DCO, if granted, would give consent for the project in recognition of its national importance and may also include authorisation for the compulsory acquisition of land to assist in the achievement of its objectives.

Para 1.39 – If a DCO for Airport use is granted, the early review of the Plan will need to take this into account as well as its implications for other policies in the Plan and consequential land use considerations. In the event that the DCO is not granted or does not proceed, **the Council will similarly need to consider the most appropriate use for the site as part of the early review** (bold added for emphasis).

Policy SP07 – Manston Airport as identified on the Policies Map is safeguarded for airport related uses. **Whether or not the DCO is confirmed, the future use and development of Manston Airport and/or other policies affected by the outcome of the DCO process will be determined through the early review of the Plan.**” (bold added for emphasis)

- In the [REDACTED] by the Inspectors appointed by the Secretary of State state at Paragraph 223¹⁰¹:
“223. In 2018 RiverOak Strategic Partners ('RiverOak') submitted an application for a DCO to reopen the site for an air cargo operation. Rather than await the outcome of the DCO, **paragraphs 1.38-1.45 of the Plan are intended to take a 'neutral' stance on the future use of the site, with a commitment to review the Plan once a decision has been made.** When considering the need for Thanet to have an up-to-date plan in place, this is an entirely reasonable and appropriate strategy” (bold added for emphasis).

AA. **In response to the Applicant's submission [TR020002-005769] - Page 11**
Paragraph 21-22 : Call For Sites

¹⁰¹ [REDACTED]

(accessed 17 November 2021)

- The Proposed Development has been submitted and accepted in the Call for Sites as part of the early review¹⁰².

BB. **In response to the Applicant's submission [TR020002-005769] - Page 11 Paragraph 23- 24**

- We respectfully disagree with the Applicant that there are no Local Planning policy barriers to the Proposed Development, as set out below.

Proposed Development Contrary to Strategic Priority 1¹⁰³

- Strategic Priority 1 of the adopted Thanet Local Plan sets out the broad strategy and identifies key objectives and industries including tourism, culture and leisure. In terms of infrastructure it only identifies the growth of Ramsgate Port and improvements to the high speed rail links. There is no support for or dependency on the Proposed Development in Strategic Priority 1.

Proposed Development Contrary to Strategic Priority 2¹⁰⁴

- Strategic Priority 2 of the adopted Thanet Local Plan sets out the importance of regeneration of Thanet's coastal town centres and this includes "*assisting Ramsgate to achieve its full potential capitalising on its historical and nautical heritage and visitor economy¹⁰⁵*". There is no support for or dependency on the Proposed Development in Strategic Priority 2.
- Thanet Local Plan identifies key assets being good quality schools and the area's unique coast, countryside, its townscape and cultural heritage and potential of the coastal towns, while safeguarding the natural

¹⁰² [REDACTED] (accessed 16 November 2021)

¹⁰³ Page 16, [REDACTED] (accessed 18 November 2021) Strategic Priority 1

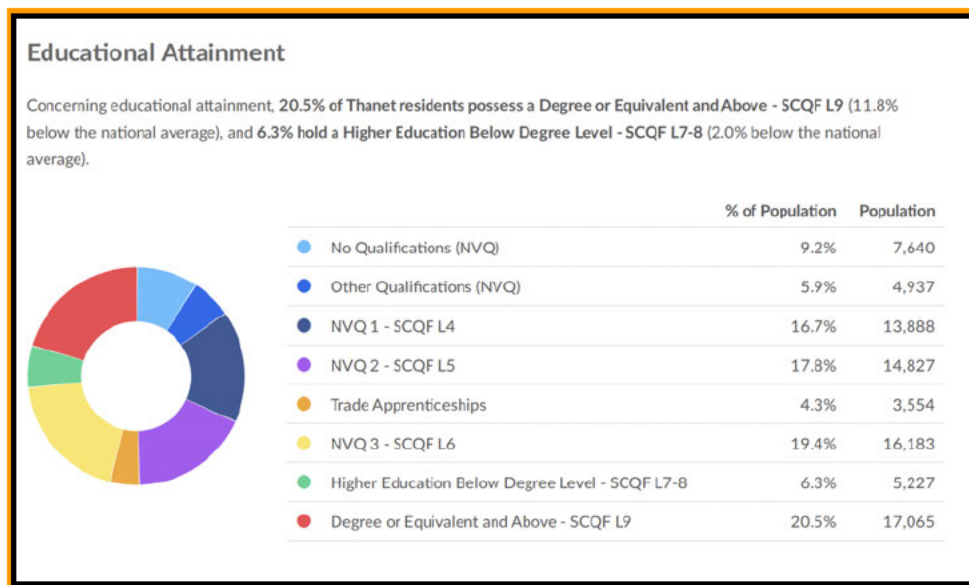
¹⁰⁴ Page 16 [REDACTED] (accessed 18 November 2021) Strategic Priority 2

¹⁰⁵ Page 16, [h](#) [REDACTED] (accessed 18 November 2021) Strategic Priority 2

environment. The Proposed Development threatens these key assets.

Education

- Thanet's 2020 Educational Attainment¹⁰⁶ updated in July 2021 is shown below.



New evidence reported in CAP 2257 by the Civil Aviation Authority¹⁰⁷ in September 2021 states at para 3.30:

“Children’s Learning

3.30 Clark et al published a meta-analysis of the association between aircraft noise at school on children’s reading comprehension and psychological health. The data from three studies carried out in 106 schools near London Heathrow, Amsterdam Schiphol, and Madrid Barajas airports (the Schools Environment and Health Study, the West London Schools Study,

¹⁰⁶ Page 3 Economy_Overview_Thanet Available online at:

[REDACTED] (accessed on 16 November 2021)

¹⁰⁷ Para 3.30 Aircraft Noise and Health Effects – a six monthly update Environmental Research Consultancy Department CAP 2257 Available online at:

[REDACTED] (accessed 17 November 2021)

and the RANCH study), using the Strengths and Difficulties Questionnaire, were analysed. The authors reported that **a 1 dB increase in aircraft noise exposure at school was associated with a -0.007 (95%CI -0.012 to -0.001) decrease in reading score and a 4% increase in odds of scoring well below or below average on the reading test¹⁰⁸** (bold added for emphasis).

- There has been no aircraft noise exposure at schools in and around Ramsgate for over 7 years¹⁰⁹.
- Therefore a 1 dB increase in aircraft noise exposure will increase from a baseline of zero.
- The impact to children's reading score and scoring on the reading test from a baseline of zero is **significant**.
- For example aircraft noise of > 60 dB LAeq 16 hr from a baseline of zero would mean -0.042¹¹⁰ decrease in reading score and a 240%¹¹¹ increase in odds of scoring well below or below average on the reading test for a child in Ramsgate. Please note these are averages, one aircraft noise exposure could be in the region of 90-100 dB.
- Research finds robust associations between reading ability and educational success, and reading enjoyment and reading behaviour appear to be key mechanisms in this relationship.
- Reading ability affects attainment in literacy and, due to the need to read to gather information and understand examination instructions, reading ability also affects attainment across the curriculum¹¹².
- The EEF and Royal Society report found that it is not lack of motivation to learn science that is contributing to the attainment gap between disadvantaged pupils and their better-off classmates. Analysis of

¹⁰⁸ Para 3.30 Aircraft Noise and Health Effects – a six monthly update Environmental Research Consultancy Department CAP 2257 Available online at:

[REDACTED] (accessed 17 November 2021)

¹⁰⁹ The former Manston Airport closed in May 2014.

¹¹⁰ (60 x -0.007)

¹¹¹ (4% X 60)

¹¹²

[REDACTED] (accessed 17 November 2021)

attainment data finds that the biggest predictors of pupils' attainment in science are their levels of literacy and their scientific reasoning ability¹¹³. The researchers found that the strongest factor affecting pupils' science scores is how well they understand written texts¹¹⁴.

Table of Showing the Relationship between reading age, education and life outcomes¹¹⁵

The effect of reading ability continues throughout life. Compared to their counterparts with 'functional literacy' levels (a reading age of 11 or above), individuals with low reading ability are:	
Less likely to gain employment, particularly skilled roles	More likely to exhibit behavioural problems and delinquency
Less like to earn an above average salary	More likely to offend, be incarcerated and develop a habit of lifelong offending
Less likely to achieve qualifications or receive work based training or promotion	More likely to have low levels of psychological wellbeing and life satisfaction
Less likely to use preventative health services, remain healthy or manage treatment and medications well	

New evidence reported in CAP 2257 by the Civil Aviation Authority¹¹⁶ in September 2021 states at para 3.31:

"Children's Learning

3.31 The analyses also found that a 1 dB increase in aircraft noise exposure at school was associated with a 0.017 (95% CI 0.007 to -0.028) increase in

¹¹³

(accessed 17 November 2021)

¹¹⁴ *Ibid*

¹¹⁵ The relationship Between Reading Age, Education and Life Outcomes, Ellie Mulcahy, Eleanor Bernardes and Dr Sam Baars Available online at:

(accessed on 17 November 2021)

¹¹⁶ Para 3.30 Aircraft Noise and Health Effects – a six monthly update Environmental Research Consultancy Department CAP 2257 Available online at:

(accessed 17 November 2021)

hyperactivity score. No effects were observed for emotional symptoms, conduct problems or Total Difficulties Score" (bold added for emphasis).

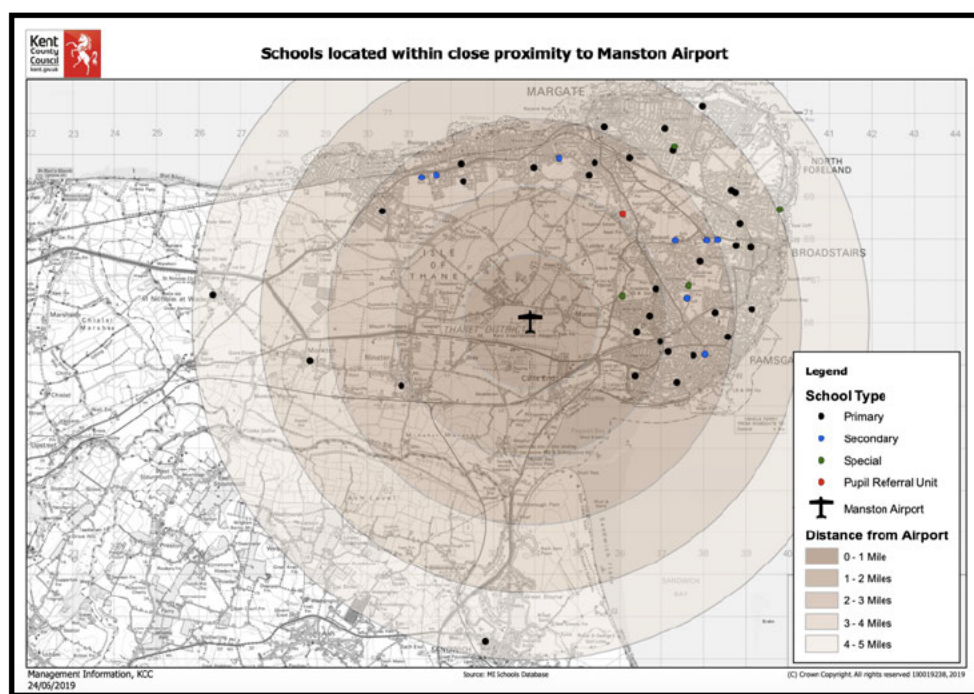
Table of Schools and Nurseries that Fall within Each of the Proposed Airport Exposure Contours in Ramsgate¹¹⁷

No.	Proposed Airport Exposure Contour	Name of Schools	School Capacity/ Number of Pupils if greater
1	> 60dB LAeq 16 hr	Fledgelings Nursery School	Childcare facility
2	> 57 dB LAeq	Priory Infant School	180
3	> 57 dB LAeq 16 hr	Chilton Primary School	420
4	> 57 dB LAeq 16 hr	Ellington Infant School	270
5	> 57 dB LAeq 16 hr	Christchurch Church of England Junior School	240
6	> 57 dB LAeq 16 hr	The Grange Montessori (Townsend Montessori School)	Childcare facility
7	> 57 dB LAeq 16 hr	Elms Nursery School	Childcare facility
8	> 57 dB LAeq 16 hr	St Laurence-in-Thamet- Church of England Junior Academy	256
10	> 57 dB LAeq 16 hr	Chatham & Clarendon Grammar School	860 (number of pupils 1470)
11	> 57 dB LAeq 16 hr	Bright Start Ramsgate	Childcare facility
11	> 54 dB LAeq 16 hr	Newington Community Primary School	694
13	> 54 dB LAeq 16 hr	Mother Goose	Childcare facility
14	> 54 dB LAeq 16 hr	The Old Priory School (special independent secondary school)	33
15	> 51 dB LAeq 16 hr	Ramsgate Arts Primary School	420
16	> 51 dB LAeq 16 hr	St Ethelbert's Catholic Primary School	210 (number of pupils 212)

¹¹⁷ [\[REP 9-063\]](#) (accessed at 17 November 2021)

17	> 51 dB LAeq 16 hr	Small Haven School (special needs school)	36
----	-----------------------	---	----

- Kent County Council, also, provided a list of the schools within a radius of the site to the examination¹¹⁸ and a map was also provided attached to this response¹¹⁹.



Heritage

- The adopted [REDACTED] specifically at Job Growth Para 1.12 looks to the “*The Heritage Action Zone in Ramsgate also looks to achieve economic growth by using the historic environment as a catalyst*¹²⁰” and at Para 4.94 “*The preservation of Thanet's heritage*”

¹¹⁸

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004611-KCC%20Copy%20of%20Appendix%201%20and%202%20-%20Schedule%20of%20schools%20within%20radius%20of%20Manston%20Airport.pdf>

¹¹⁹

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004611-KCC%20Copy%20of%20Appendix%201%20and%202%20-%20Schedule%20of%20schools%20within%20radius%20of%20Manston%20Airport.pdf>

¹²⁰ Para 1.12 [REDACTED]

(accessed 18 November 2021)

is considered to be an economic asset, and its maintenance and protection plays an important role in the district's economy and aids in regeneration and investment. In recognition of the array of historic assets, Ramsgate has been named as Heritage Action Zone in 2016 by Historic England. This will provide necessary funding and investment to restore a number of heritage assets and regeneration of the area¹²¹."

- The ExA concluded and recommended **"that the Proposed Development would have an adverse effect on the aims of the HAZ for Ramsgate to grow into a prosperous maritime town where outstanding heritage and architecture coupled with new investment and development strengthens the economy for the benefit of the local community"**¹²² (bold added for emphasis).
- This directly **contravenes Strategic Priority 2** of the adopted Thanet Local Plan¹²³, which sets out the importance of regeneration of Thanet's coastal town centres and this includes *"assisting Ramsgate to achieve its full potential capitalising on its historical and nautical heritage and visitor economy"*¹²⁴

New evidence

- The draft Ramsgate Conservation Area Appraisal published in November 2021¹²⁵ and funded by Historic England as part of Ramsgate's Heritage Action Zone (HAZ) found that:

¹²¹ Para 4.94 [REDACTED]
(accessed 18 November 2021)

¹²² Para 6.3.183 of the ExA Recommendation Report Available online at:
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-05347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed on 15 November 2021)

¹²³ Page 16, [REDACTED]
(accessed 18 November 2021) Strategic Priority 2

¹²⁴ Page 16, [REDACTED]
(accessed 18 November 2021) Strategic Priority 2

¹²⁵ [REDACTED] [1](#) (accessed 17 November 2021)

Ramsgate Conservation Area¹²⁶ is of exceptional historic and architectural interest as a coastal resort town and working harbour with a fine array of heritage assets spanning the seventeenth to the twentieth century, representing a complete cross section of the society which lived, worked and visited Ramsgate over more than three centuries of growth and change.

This special interest can be broken down into the following key elements:

- **A place built to appreciate views of the sea and sunlight.**

Ramsgate is special for the well-preserved eighteenth, nineteenth and twentieth-century seaside resort developed with fashionable housing, guest houses, hotels, public gardens and promenades running along clifftops to exploit the dramatic, south-east facing views over the English Channel and the 'amphitheatre' of the Royal Harbour. The area has a unique skyline of special architectural interest in views back from the harbour and sea.

- **The Royal Harbour.**

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

- **Eighteenth and nineteenth-century resort development.** The residential areas beyond the town centre are defined by a remarkable survival of eighteenth- and nineteenth-century terraced housing and villas, as well as shops, public houses, places of worship and light

¹²⁶ Map of Ramsgate Conservation Area

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003579-Five10Twelve%20-%20Comments%20on%20Responses%20to%20ExA%27s%20WQ%20-%20Appendix%20Section%20G1-DD.pdf> (accessed 17 November 2021)

industrial works, which is almost unique on a national scale. These neighbourhoods provide a complete cross section of the society which lived, worked and visited Ramsgate during its heyday as a coastal resort, which is of fundamental significance to the character and appearance of the conservation area. The network of alleyways, ginnels and passages which criss-cross these neighbourhoods, as well as the historic town centre, are significant in breaking down the urban grain, enhancing pedestrian access across the conservation area and creating picturesque, channelled views.

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

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

- **Pre-resort town survivors.**

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

context of expanding international and national naval commerce during the seventeenth and eighteenth centuries.

- **Public buildings and works.**

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

- **High quality of undesignated buildings and structures.**

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

- **Evocative street names.**

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

- The ExA concluded and recommended that visual effects of the Proposed Development would cause harm to the Ramsgate conservation Area and


that such harm would be less than substantial¹²⁷.

- This new evidence supports the conclusion that the visual effects of the Proposed Development would cause harm to the Ramsgate Conservation Area and that such harm would be substantial.
- Relevant Policy: This Historic England note¹²⁸ provides general advice on understanding setting and how it can contribute to the significance of heritage assets and allow that significance to be appreciated, as well on how views can contribute to setting. The note provides a staged approach to taking decisions on setting. It states that setting is not itself a heritage asset or designation; its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance (paragraph 9). The contributions made by the setting of heritage assets to their significance varies. The note states that many settings may be enhanced by development but that not all settings have the capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it (paragraph 17).
- Relevant Case Law: The *Barnwell Manor Wind Energy Ltd [East Northamptonshire, English Heritage and The National Trust v. Secretary of State for Communities and Local Government and Barnwell Manor Wind Energy Ltd]*¹²⁹ Court of Appeal (CoA) judgment has wider applicability than simply to wind turbines. The CoA held that a decision-maker, having found harm to a heritage asset, must give that harm “*considerable importance and weight*”. This test goes further than simply balancing the effect on a Listed Building and its setting, or on the character or appearance of a Conservation Area,

¹²⁷ Para 6.3.108

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-05347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed on 18 November 2021)

¹²⁸ Available online at:

 (accessed 17 November 2021)

¹²⁹ *Barnwell Manor Wind Energy Ltd v East Northants DC, English Heritage, National Trust and SSCLG* [2014] EWCA Civ 137

against the benefits of a Proposed Development, and less than substantial harm should not be equated with a less than substantial objection.

Heritage Tourism

- Heritage tourism generates benefits in the local economy (Historic England 2016). A TNS study estimates that 32 per cent (£15.3bn) of the average annual spend from domestic and international tourism in the UK between 2011 and 2014 is attributable to activities broadly defined as heritage-related activities (TNS 2015)¹³⁰.
- Visiting heritage generates money for the local economy – for every £1 spent as part of a heritage visit, 32p is spent on site and the remaining 68p is spent in local businesses: restaurants, cafés, hotels and shops (HLF 2010)¹³¹.

Tourism

- During the 2021 summer period, train travel to Thanet increased by 71% during the peak season as the demand for a UK staycation at the coast remained strong¹³².
- Thanet's visitor economy was valued at £352 million, after welcoming 4.6 million visitors in 2019. The number of tourism jobs across the district showed a 9% increase between 2017 and 2019, to 8,664, accounting for 20% of Thanet's total employment in 2020¹³³.
- Thanet contributed the 4th largest financial contribution to Kent's Visitor Economy in 2019¹³⁴ behind Dartford, Canterbury and Medway.

¹³⁰ [REDACTED]

(accessed 18 November 2021)

¹³¹ *Ibid*

¹³² [REDACTED]

[REDACTED]
(accessed 17 November 2021)

¹³³ [REDACTED]

(accessed 17 November 2021)

¹³⁴ [REDACTED]

(accessed 17 November 2021)

- Visits to Thanet increased by 8.6% in 2017, with a record 4.2 million visitors. Research by Visit Kent identified that the number of day trips to Thanet had increased by 9.9% in 2017, while the total number of nights stayed in the district increased by 4.9%. The same research stated that the total number of jobs supported by tourism rose by 8.7% to 7,950, with the industry accounting for 19% of total employment across Thanet¹³⁵.
- It is of a significant note, that Thanet's visitor economy grew 19% in 2015 (after the closure of the former Manston Airport in May 2014), making it the biggest district tourism success story in the county of Kent and arguably the whole of the UK. The district bucked the national trend with trips to its popular seaside destinations of Margate, Broadstairs and Ramsgate rising by 16%, despite visitors to England registering a 5% drop¹³⁶.
- Currently, nearly 90% of visitors to Thanet are day visitors. Some 30% of visitors come in June, July and August. Staying visitors spend 7 times as much as day visitors and are much "kinder" to the local community and environment. For the visitor economy to be genuinely sustainable – good for industry, community and the environment – Thanet needs to attract more staying visitors, and more visitors outside the summer months¹³⁷.
- It has been identified that lack of volume and choice of visitor accommodation restricts the ability to grow higher-value tourism and at times to secure large-scale events¹³⁸.
- The Proposed Development's flightpath is directly over at least 4 hotel

¹³⁵ Para 6.10.49

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed on 17 November 2021)

¹³⁶ Cambridge Economic Impact Model 2015

(accessed on 17 November 2021)

¹³⁷ Page 5, Thanet Destination Management Framework January 2020 Available online at:

(accessed on 15 November 2021)

¹³⁸ Page 8, Thanet Destination Management Framework January 2020 Available online at:

(accessed on 15 November 2021)

accommodation providers and 2 hotel accommodations in development with private and public investment¹³⁹ and will impact beaches from Ramsgate to Margate.

- The ExA concluded and recommended that the Proposed Development would have an adverse effect on tourism in Ramsgate¹⁴⁰.
- Thanet District Council confirmed its view in the examination that: *"...whilst the proposed development may bring further tourists to the area, the amenity impacts from the construction and operation of the proposed development may adversely affect the tourism industry in Ramsgate and the wider Thanet area and weigh against any proposed benefit"*¹⁴¹.
- The Proposed Development therefore **directly contravenes Strategic Priority 1**¹⁴² of the adopted Thanet Local Plan, which sets out the broad strategy and **identifies key objectives and industries including tourism, culture and leisure.**

CC. **In response to the Applicant's submission [TR020002-005769] - Page 11 Paragraph 23-24 Proposed Development Contrary to Strategic Priority 2**¹⁴³

- Since the examination both Ramsgate and Margate have been successful

¹³⁹ [REDACTED] (private investment) and part of the successful Ramsgate Levelling Up Fund bid awarded. A new boutique hotel and a high end restaurant and a brasserie will provide meaningful apprenticeships and in work training in hospitality [REDACTED] (public investment awarded 27 October 2021).

¹⁴⁰ Para 6.10.141

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> accessed on 15 November 2021)

¹⁴¹ Para 6.10.121

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed on 15 November 2021)

¹⁴² Page 16, [ht](#) [REDACTED] (accessed 18 November 2021) Strategic Priority 1

¹⁴³ Page 16, [REDACTED] (accessed 18 November 2021) Strategic Priority 2

in the first round of Levelling-Up bids¹⁴⁴.

- The Levelling-Up bid for Ramsgate is called Ramsgate Future.
- Ramsgate Future

Plans for a 'Green Port', a Green Hub training centre for apprenticeships and training, hospitality and fishing fleet proposals and community kitchens. Ramsgate Future includes plans to create a training hotel and restaurant at the Smack Boy's building at Ramsgate Royal harbour, a brasserie and a fishing facility for the local fleet to store and sell catch from; a new town square on the current pier yard car park, a refurbished clock tower building and two community sites in Newington and Ramsgate with training kitchens, community teaching.

- The Proposed Development would result in cargo flights directly overhead Ramsgate's Town Centre, Royal Harbour and the above-mentioned Levelling-Up Fund developments at altitudes of approximately 500ft-600ft¹⁴⁵, putting such developments at significant risk.
- This directly **contravenes Strategic Priority 2** of the adopted Thanet Local Plan¹⁴⁶, which sets out the importance of regeneration of Thanet's coastal town centres and this includes "*assisting Ramsgate to achieve its full potential capitalising on its historical and nautical heritage and visitor economy*"¹⁴⁷
- The Levelling-Up bid for Margate is called in MargateDigital project which will focus on digital technology.
- There is no support for or dependency on the Proposed Development in either MargateDigital project or Ramsgate Future.

¹⁴⁴ [h](#) [REDACTED] [margate/](#) (accessed 18 November 2021)

¹⁴⁵ [REDACTED] (accessed 18 November 2021)

¹⁴⁶ Page 16, [REDACTED]
(accessed 18 November 2021) Strategic Priority 2

¹⁴⁷ Page 16, [REDACTED]
(accessed 18 November 2021) Strategic Priority 2

DD. **In response to the Applicant's submission [TR020002-005769] - Page 11**

Paragraph 23-24 Proposed Development Contrary to Policy SP36¹⁴⁸

- At Paragraph 8.2.84 of the ExA Recommendation Report¹⁴⁹, the ExA concludes that:
"it considers that the Proposed Development would also cause limited harm to the character of the Conservation Areas in St Nicholas at Wade and Ramsgate due to the visual effects of aircraft. The proposal would be contrary in this respect to policy SP34 of the eLP".
- The adopted Thanet District Council Local Plan has kept what was known as policy SP34 of the eLP as Policy SP36 of the adopted Thanet District Council Local Plan.

EE. **In response to the Applicant's submission [TR020002-005769] - Page 11**

Paragraph 23-24 Proposed Development Contrary to Policy HE03¹⁵⁰

- At Paragraph 8.2.90 of the ExA Recommendation Report¹⁵¹ the ExA concludes that:
"The less than substantial harm caused by their demolition weighs against the Proposed Development and the Proposed Development would be contrary to policy HE03 of the eLP".
- The adopted Thanet District Council Local Plan has kept what was known as policy HE03 of the eLP as HE03 of the adopted Thanet District Council

¹⁴⁸ Page 85, [REDACTED]
(accessed 18 November 2021) Policy SP36

¹⁴⁹ Para 8.2.84

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed 17 November 2021)

¹⁵⁰ Page 162 [REDACTED]
(accessed 18 November 2021) Policy HE03

¹⁵¹ Para 8.2.90

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed 17 November 2021)

Local Plan.

- The ExA concluded that the impacts on heritage assets of the Proposed Development weigh moderately against the case for development consent being given¹⁵².

FF. In response to the Applicant's submission [TR020002-005769] - Page 11
Paragraph 23-24 Proposed Development Contrary to Policy SP47¹⁵³

- As identified by Kent County Council (as the Local Highway Authority) Policy SP47 of the adopted Thanet District Council Local Plan:
"...However, if further development is permitted, including further development at Manston Airport, which has a material impact on the capacity or operation of these routes, the Council will require alternative on-site highway provision where appropriate and/or proportionate contributions towards any improvements or changes to the existing routes which is thereby necessitated:..."¹⁵⁴.

GG. In response to the Applicant's submission [TR020002-005769] - Page 12
Paragraph 25

- The Applicant is inaccurate in its statement. The Proposed Development has not been identified as part of the Economic Growth Strategy for Thanet¹⁵⁵ nor as part of the Economic Growth for Thanet¹⁵⁶.
- We respectfully refer the Secretary of State to our submission to the First Round of Consultation and found at [TR020002-05656-014].
- In determining Job Growth Para 1.23 and Policy SP04 target of a

¹⁵² Para 8.2.103

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed 17 November 2021)

¹⁵³ Page 97, [REDACTED]
(accessed 18 November 2021) Policy SP47

¹⁵⁴ [TR020002-005741]

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005741-Kent%20County%20Council.pdf> (accessed on 15 November 2021)

¹⁵⁵ Para 1.22 [REDACTED]

¹⁵⁶ Policy SP04 [REDACTED]

minimum of 5,000 jobs, Thanet District Council set aside the Proposed Development to calculate the number of jobs¹⁵⁷ (ie: Policy SP04 is not dependent on or reliant in any way upon the Proposed Development).

- Thanet Economic and Employment Assessment estimates that between 1,200 and 5,100 jobs will be created up to 2031. The lower estimate assumes that the economy will return to recession, with 1,900 fewer jobs than the baseline estimate (of 3,100 jobs). Based on calculations provided by the Council around 2,300 total jobs had already been created between 2011 and 2017¹⁵⁸. The job growth figure in Policy SP04 is therefore reasonable and justified without the Proposed Development.
- In fact, Thanet District Council submitted evidence to the Planning Inspectorate examination of the Thanet Local Plan that a review of the housing land position would be required if the DCO is granted¹⁵⁹.
- The higher estimate of 5,000 jobs assumes positive growth in the culture, visitor economy and 'green economy'¹⁶⁰.
- These are all sectors which the Proposed Development will put at risk and areas that are currently supported by recent private investment (for example the £50 million+ beachside development the Royal Sands¹⁶¹) and public investment (for example the successful Levelling-Up bid Ramsgate Future in addition to the Ramsgate HAZ, Ramsgate Future High Street Funds and the Ramsgate High Street Heritage Action Zone schemes).

HH. **In response to the Applicant's submission [TR020002-005769] - Page 12**
Paragraph 25

- Thanet's 2020 In-Demand Skills¹⁶² updated in July 2021 are shown

¹⁵⁷ Para 230-231

¹⁵⁸ [\[REDACTED\]](#)
(accessed 18 November 2012)

¹⁵⁹ [\[REDACTED\]](#)
(accessed 18 November 2012)

¹⁵⁹ *Ibid*

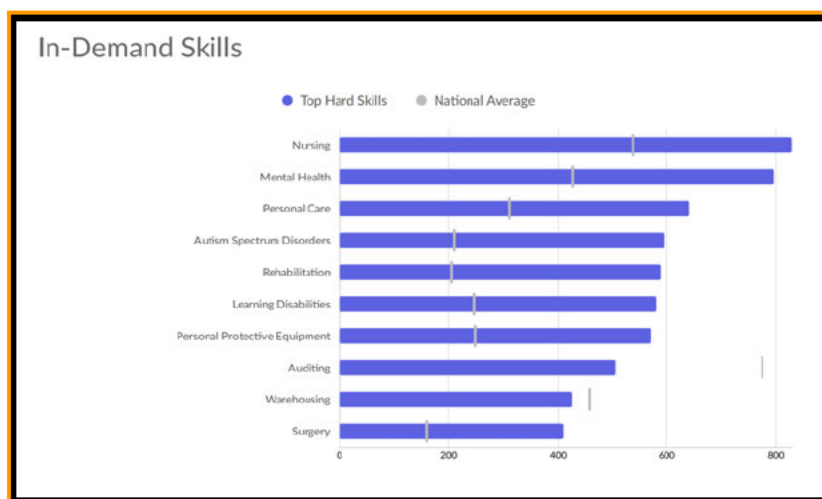
¹⁶⁰ *Ibid*

¹⁶¹ [\[REDACTED\]](#) (accessed 18 November 2021)

¹⁶² [Economy_Overview_Thanet](#) Available online at:

[\[REDACTED\]](#)
(2021)

below:



- It is of note that many of these In-Demand Skills such as nursing, mental health, personal care, autism spectrum disorders, rehabilitation, learning disorders, personal protective equipment and surgery are significantly above the national average. Aside from warehousing (not above the national average) In-Demand skills will not be supported or created by the Proposed Development.
- Another area with In-Demand Skills in Thanet is in agricultural workers and recently, Sir Roger Gale asked the Prime Minister:

Q7. *I know that my right hon. Friend wants to see the United Kingdom growing more crops. We are not going to blaze a trail to self-sufficiency by building over our finest agricultural land. That has to stop, now. On this, Back British Farming Day, we are in harvest time, and all is not safely gathered in. In three weeks, Thanet Earth in my constituency [Thanet], which is one of the largest glasshouse companies in the country and grows tomatoes, has had to trash £320,000-worth of produce because **there are no pickers and no drivers. Because of the lack of labour force**, the crops are rotting in the fields and on trees. Will my right hon. Friend seek to introduce immediately a covid-recovery visa, so that this year's crops are not lost¹⁶³? (bold added for emphasis).*

¹⁶³ Hansard Volume 700 at 903446 on 15 September 2021