

Chapter 1 - Job Growth Strategy

Job Growth Strategy SP02										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Bates	Alison	268			Object	For Thanet employment opportunities need to be created and the only way that businesses can be attracted here so as to have that to happen is for Manston Airport to be given every opportunity to become fully operational again since airports anywhere attract employment. And it is employment that Thanet needs above any additional housing. Riveroak Strategic Partners (RSP) currently have a DCO submitted which has been accepted and will now follow the prescribed route as laid down in law. Steps with TDC had been taken to totally do away with the designations EC2 and EC4 of the existing albeit lapsed Local Plan but council has decided upon a convoluted improvement to that. However I still believe the existing policies regarding the airport and SP05 should still be retained going forward as to ensure Manston Airport is retained for aviation use only. The facility is there. Any other use for it would be limited by the fact that it would cost too much to try and remove the existing runway and we would be burdened by a vast long open space forever which eventually no one would maintain	retain existing policies to ensure that Manston Airport is for aviation use only	805		Web
Bates	John	226			Object	SP01 1.22 and 1.24 should include the support of employment opportunities at a reinstated Manston Airport, including all aviation related businesses that will be associated with the RiverOak DCO application going forward	include the support of employment opportunities at a reinstated Manston Airport, including all aviation related businesses that will be associated with the RiverOak DCO application going forward	908		Web
Coombs	Joshua	292			Object	There would need to be at least 10,000 jobs to support the additional proposed number of homes of circa 17,000, as there is already an urgent employment requirement for current residents and those living already in the locality of the area. The jobs created would primarily come from building the homes and working for built / construction industries. Furthermore any other work created would be zero hours contracts. Thanet has the highest unemployment rate of 4.9%. Those moving down from the London area would primarily be those to benefit from these jobs. Most of the development companies would be based in places like London with their own contractors.		848		Web
Dawes	Jenny	59			Support	Agree		154		Web
Dawson	Emma	320			Observation	We will also need starter homes for young people attempting to climb the housing ladder but in reality those young people require jobs. Thanet currently has very high unemployment, some of the local jobs are topped up with working tax credit because of low wages and rents still require being topped up because rents are too high.		976		Email
Favell	Dorothy	490			Object	Employment The current situation in 1998s local plan. [1] The current situation Thanet has severe structural economic problems, demonstrated by a combination of economic indicators which are both significant and persistent. In January 1994 the unemployment rate stood at 16.8% and clearly illustrates the scale of the problem with the local economy. This high level of unemployment has existed for many years and is well above the average for Great Britain which stood at 10.2% in January 1994. This situation is not improving in relative terms and in December 1996 Thanet's unemployment stood at 11.7%, while that for Great Britain was 6.6%. In October 1996, Thanet had the second highest unemployment rate in England. By February 1998 the rate for Great Britain had fallen to 4.8% with Thanet double that at 9.7%.		1372		Email

					<p>The overall picture is somewhat disguised by the seasonal nature of much of the employment in the area which traditionally has been linked to tourism, agriculture and port and ferry activity.</p> <p>The Kent Impact Study Review [1991] [1] predicted that Thanet would suffer a further negative employment impact due to the Channel Tunnel and the Single European Market. Currently there is an over-dependence on very small businesses within Thanet and if the economic base is to be diversified it is essential to attract medium-sized companies in potential growth sectors into the area. A major land use obstacle has been the lack of readily available fully serviced sites and premises.</p> <p>In addition to the above problems, Thanet is generally still perceived as a run-down tourist area with poor road and rail connections. These perceptions contribute to the area presenting a poor investment image.</p> <p>It is now 2015, some 17 years later and I cannot see that the situation has changed one bit. And what indicators are there to give hope that in a further 17 years employment prospects and pay scales would have improved? Jobs are advertised, and for one position hundreds, if not thousands, of applications are received. Pay is all too often at minimum wage and on zero hours contracts. The latest ploy is for employers to advertise the vacancy as an apprenticeship...shops and offices are now getting in on this. This is in effect cheap labour taking advantage of young people, and preventing older people from finding positions.</p> <p>This Experian report has, I believe, been used as guidance for the local plan but my understanding is that the report is just a suggestion not hard facts. The report states that unemployment in Thanet has traditionally been above average and the gap is widening. Tourism and green sectors seem to comprise a sizeable proportion of total business.</p> <p>https://drive.google.com/file/d/0B2P-3cgZvVQCM2RqX1RsS2V4S3c/view?usp=sharing</p> <p>This predicts 3100 jobs will be created and not the 5000 in the local plan, this is 62% less, and so the number of houses required is only 7440. Population for these homes will be 15000 and not 25000. My argument is that this local plan will have an adverse effect on tourism and an even worse effect on green sector business.</p> <p>To conclude, I have left out many of the points raised in the local plan, not because I agree with them, but because my main personal concerns are that the proposed use of agricultural land in Birchington should be taken out of the plan, I am questioning the need for 17,200 houses overall, I am disputing the number of jobs forecast, and I advocate Manston Airport remaining as a functioning airport with only aviation related activities.</p> <p>Other documents used in the writing of my objections:</p> <p>https://www.gov.uk/government/policies/giving-communities-more-power-in-planning-local-development/supporting-pages/local-plans</p> <p>http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf</p> <p>http://www.guildford.gov.uk/media/15420/Local-Plan-Issues-and-Options-document/pdf/Guildford_borough_Local_Plan_Strategy_and_Sites_Issues_and_Options.pdf (what a shame TDC did not produce such a worth document!)</p> <p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5959/1896534.pdf</p> <p>https://excel.office.live.com/x/ExcelView.aspx?FBsrc=https%3A%2F%2Fwww.facebook.com%2Fattachments%2Ffile_preview.php%3Fid%3D647776915348424%26time%3D1425678079%26metadata&access_token=100001906038614%3AAVI7q2PpQZw2J70YinGV7HCbDd95VZml8avXRsgEI4h8g&title=Country+of+birth+tables+2008+to+2012.xlsx</p> <p>This document shows how immigration is affecting the population of the UK – in Thanet we have had an upsurge of immigration in recent years. This is affecting the availability of jobs, and the availability of housing. It is my contention that immigration, which was unfettered during the last Labour administration, and which the coalition government</p>				
--	--	--	--	--	---	--	--	--	--

						have done little to contain, is having a direct impact on Thanet and the drafting of this local plan. Why should the settled local population have to put up with the consequences of failed government policies? If this link does not open see attached document. http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.gos.gov.uk/gose/planning/regionalplanning/815640/				
Holton	Susan	139			Observation	It would be "greener" to use the Port at Ramsgate for expanding the leisure moorings rather than allowing the mineral use and waiting for a Roll on Roll Off operation which never seems to materialise. Tourism is the most likely thing to bring Jobs to Thanet - Ramsgate's harbour, the Turner Centre, the history of the area should be promoted more to expand the hospitality side.		345		Web
Huckstep	Terence	40			Observation	I note the value placed on the 7 seven rural sites however if housing was allowed on the Manston site then a number of these communities will be destroyed as they will be joined up with a mass housing ghetto. Also the plans of RSP when bought to fruition will exceed the number of jobs you would hope to see created within the timescale of this plan thus satisfying your stated intent on job creation in excess of this plan.		90		Web
Hutson	Laura	348	Sport England		Object	Policy SP02 – economic growth Sport England wishes to highlight the fact that sport makes a very substantial contribution to the economy and to the welfare of individuals and society. It is an important part of the national economy, contributing significantly in terms of spending, economic activity (measured using Gross Value Added) and employment. For those who participate there are health and well-being (or happiness) impacts. Its economic impact places it within the top 15 sectors in England and its wider economic benefits mean that it is a key part of society, which results in huge benefits to individuals and communities. Sport England would therefore request that the value of sport to the economy is reflected within the Local Plan.		1039		Email
Johnson	Elisabeth	51	Monkton Residents Association		Observation	These days many things depend on accessibility, so we are back to the road networks which cannot cope at busy times now, also visitors are unlikely to be attracted to the area if they are unable to park without paying exorbitant car parking fees, however good the range of tourist facilities are.		121		Web
Jones-Hall	Jason	228			Observation	I note that at 1.3 in this section you state, in accordance with the NPPF, that "plans should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose." TDC's decision to "not to allocate the (Manston) Airport site for any specific purpose in the draft Local Plan" appears to directly contradict this aim since it is, in effect, continues to reserve this site for prospective employment use, despite not having been used as such for at least four years to date and TDC's own independent report which confirmed "airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the period to 2031". This surely falls into the category of "no reasonable prospect of the site being used for that purpose". Further, the proposed plans for air cargo use would undoubtedly have a negative impact on many of the other strategic priorities identified here with regards to employment growth, in particular for Ramsgate, which RiverOak Strategic Partners (RSP) have confirmed in their submission to PINs would suffer "significant adverse effects have been identified as being likely as a result of an increase in noise". As a resident and business owner in Ramsgate, specifically working on major arts, culture and heritage based regeneration of our coastal towns, including Ramsgate, and in the creative/digital sector, I strongly welcome and support the initiatives outlined in this section but I do not see how they are consistent with RSP's proposed plans and their detrimental impact on Ramsgate, in particular:		694		Web

						<p>Allocation of vibrant town centres able to accommodate a wide range of compatible uses reflecting their individual characters and economies; and</p> <p>Cultivating the creative industries across Thanet;</p> <p>Improving digital infrastructure and business support for entrepreneurs working from home;</p> <p>Destination Management Plan;</p> <p>Tourism-related growth, (NB: TDC stats show that tourism and tourism-related employment increased in Thanet by up to 23% immediately after the former Manston airport closed);</p> <p>Improving education and skills;</p> <p>Promoting Thanet's cultural/leisure offer;</p> <p>Long-term feasibility modelling for Ramsgate;</p> <p>Recognising the important role of cultural and creative industries in the regeneration and reinvigoration of Thanet's towns.</p>				
Jones-Hall	Samara	295			Observation	<p>Official Nomis statistics show that employment in Thanet has grown 13.8% since the closure of Manston Airport. General employment growth in Thanet mirrors 23% jobs growth in Tourism since closure of Manston. We must continue to back winning strategy/proven success by investing in Heritage, Arts, Culture and Active Lifestyle related Tourism. A 24/7/365 cargo hub will blight - slow or reverse - this economic growth and employment growth.</p>	<p>The Local Plan must support the mixed-use development of the former Manston airport site and allocate a specific purpose for the Manston site with regards to housing requirements and mixed-use development.</p> <p>This is line with Objective 2 of the Department for Environment: Food and Rural Affairs single developmental plan updated 23 May 2018, the National Planning Policy Framework updated July 2018 and its Local Plan policies including but not limited to SP02, SP09, SP12, SP21, SP23, SP34, SP36, E10, E05</p> <p>Commercial aviation is not viable at the Manston site.</p> <p>A 24/7/365 cargo hub will blight tourism, regeneration, economy, heritage, employment growth and health of Thanet residents.</p> <p>Further, the impact of and congestion on road vehicles and HGVs used to transport air-cargo, workers, passengers and fuel travelling to and from the proposed airport on Kent's road transport infrastructure and the associated carbon, nitrogen oxides and particulate matter emissions, noise and air pollution - on Thanet's and Kent's villages, towns and businesses is</p>	880		Web

						<p>unacceptable nor has it been subject to a Health Impact Assessment; and - nor have travel times for all East Kent stroke victims to reach stroke unit in time as the nearest stroke unit is likely to be moved to William Harvey Hospital in Ashford been addressed.</p> <p>Further, it is a brownfield site which could be used to meet a significant proportion of district's housing needs instead the draft Local Plan (endorsed by Thanet District Council but opposed by its officers) has pushed 2500+ houses to be built on Greenfield sites and in areas with little or no additional infrastructure.</p> <p>Further, Official Nomis statistics show that employment in Thanet has grown 13.8% since the closure of Manston Airport. General employment growth in Thanet mirrors 23% jobs growth in Tourism since closure of Manston. We must continue to back winning strategy/proven success by investing in Heritage, Arts, Culture and Active Lifestyle related Tourism. A 24/7/365 cargo hub will blight - slow or reverse - this economic growth and employment growth.</p> <p>Further it will destroy and diminish Thanet's landscape character and local distinctiveness.</p>			
Lamb	Kyla	373	Minster Parish Council		Object	<p>Employment Opportunities: The optimistic figures of future employment, as far as we can tell, have been taken from the Experian report, dated 2012. Thanet District Council have taken the maximum figure provided in each case which, given the historic figures of low employment growth in Thanet as against the U.K average, is divorced from reality. The report provides a realistic figure of 3,100 yet Thanet District Council chooses to use the higher figure of 5,000; the additional 2,000 jobs are predicated solely on ambitious growth plans in relation to Manston Airport. In fact, over recent years the number of unemployment benefit claimants in Thanet has been twice the average for the region. If Thanet District Council had been more pragmatic in their use of figures the number of houses needed would be more realistic and possibly more deliverable.</p> <p>Despite the optimism expressed in the Experian report regarding Ramsgate Port, there is no cross channel service running and the prospect of its re-introduction is poor. The Port is currently losing approximately £2 million per year, the infrastructure is decaying and there appears little sign of an early resolution to these problems.</p> <p>In relation to the prospects at the Port, the Local Plan sets out 4 key priorities which speak very little of future employment but rather more seeking to return to previous</p>		1072	Paper

						business operations. Nowhere in their economic strategy of 2016 has Thanet District Council delivered on their aim of "transformational initiatives" and the latest review of economic developments in Thanet shows little positive growth.				
Lorenzo	Peter	37	The Broadstairs Society		Observation	There are factors that seem to be ignored: to what extent BREXIT will have on this area and that Thanet is amongst those areas that have the highest level of benefit claimants. No-one really knows the impact Brexit will have if there is "No Deal" despite people arguing for more than twenty years how much better things will be if the UK were to leave the EU without spelling out just what those benefits were. Consequently, developing Ramsgate Port may turn out to be an expensive folly. Surely the District Council would be better employed ensuring the indigenous population was upskilled?		73		Web
Margate Estates		460	Margate Estates	Zena Foale - Banks - Nexus Planning	Object	Policy SP02 sets out the job growth strategy for the District. We recommend that the policy is amended to recognise Dreamland, which is currently, and would continue to be a key employer within Margate. By including reference to this facility in the supporting text of the policy itself, the role of Dreamland within Margate and within Thanet would be solidified. Furthermore, Thanet District Council has identified that there is high demand for additional hotel development within the district. As hotels have the ability to provide significant employment opportunities for local people, it would be beneficial to include direct reference to support for hotel development within Policy SP02.		1313		Web
MEADEN	IAN	2			Observation	The aims of the last paragraph seem to be contrary to the plans to ruin the character of St Nicholas At Wade by excessive new housing development.	More regard to reality.	2		Web
Messenger	Carol	383			Object	GL Hearn using the Experian report suggested that 3000 jobs were possible, given historical data but the local plan has 5000...2000 more jobs were added. There is no evidence to prove where these jobs are going to come from. The Economic Development Plan was put together when the council had an Economic Development team, but the council no longer has Economic Development department. Therefore, I think inward investment (unless coming from the airport that hasn't been included in the plan) would be unrealistic. Thanet has the highest unemployment in Kent, you don't have to be Einstein to work out the maths don't add up!		1126		Web
musselwhite	john	185			Observation	It states that 5000 jobs are planned to be created. Given the history of the area and its inability to create jobs on that scale I would suggest this is unlikely. Most people who are creating jobs are very much "art" and food/drink based -the latter will be seasonally biased and create jobs more for students and part time workers, rather than sustainable full time posts. The airport-- should it ever happen-- would unlikely to be able to create many jobs as they get a return on their investment, state of the art automation will be in place to reduce costs. Should the airport be developed with freight (in the air and on the roads), it's highly likely this will put a damper on the recent growth in tourism and also -as it's directly under the flight path--on hopes to develop the marina at Ramsgate. Said 5000 jobs will be a very small % of the possible 50k+ new residents that will fill the 17K or so new homes. What exactly are the remaining 90% to do??--- I would imagine put a huge drain on the resources of the social services, doctors and hospital network as it seems likely they will be dumped here from London Boroughs as a cheaper way of dealing with their poor, old and jobless. This will give an enormous negative impact on the recent growth and investment in the tourist and art scene locally. Mixed housing -on a smaller scale than planned--would be welcome but mass social cleansing of their problems by the London Boroughs would make Thanet a very unpleasant place to live and visit. I am not against new housing, but the effective doubling of population of Westgate is not going to		540		Web

						work. It has no car parks. With 2500+ new homes on its outskirts, just where are those people meant to drive to. Yes, shops and services will be put in place on the new built land, but from my experience-and I get around a lot--these will be limited ie a medium sized Co-op or Sainsbury which will curtail any range smaller shops (buther, baker, fruit/veg shops) from surviving. People wanting the type of services Westgate provides - dentists, opticians, hair and beauty, cafes, etc will still head there, and it will grind to a halt. Westgate has a far higher % of 65+ year olds than the UK average and their quality of life will deteriorate with a new town effectively on their doorstep. It just wont work, its in the wrong place. If you live in the area its will be blindingly obvious -if not, perhaps you should spend some time there.				
Nunn	Julie	368			Observation	<p>Thanet Policy on Jobs and Economic Growth. Policy SP02. This document refers to a minimum of 5,000 additional jobs planned for Thanet to 2031.</p> <p>Thanet already has an unemployment level of 4.9% which is twice the national average (2.4%).</p> <p>As stated in the opening paragraph the proposed 30,000 houses across Thanet is not warranted to support the local demand for housing. Additional residents would have to be brought into the area to fill these houses and there is not enough employment. The 5000 additional jobs would not reduce the local unemployment to the national average. The area would be over run with unemployed people, seeking benefits and calling upon the local services which are already significantly challenged. The additional demand on resources would not provide wealth to the area and would not therefore generate future employment opportunities.</p> <p>The 2000 additional houses for the Garlinge area have no employment opportunities. The local area has 2 small pubs and few high street shops and no employment opportunities. In order to take employment opportunities (if they were to exist) individuals would be forced to take public or private transport further increasing the pressures on the road network and further contributing to noise and pollution.</p>		1066		Paper
Orton	Geoff	323			Observation	<p>Thanet's own population is flatlining – presumably a reflection on the lack of jobs (which explains the highest rates for empty properties south of the Wash). The Institute for Economic Affairs ascribed low investment to low wages and low skills.</p> <p>The Select Committee on Housing last November (Helen Hayes MP RTPI) put it to the then Minister that 'economy comes first'. He agreed. It is not clear where Marsham Street sees the jobs coming from : the Centre for Cities has recently forecast 30% job losses in 'left behind' districts (and the Bank reckons more like 50% 'technological redundancy is in prospect.) Thanet would need something like 15,000 jobs to stand still. 17,000 houses implies 40 to 50,000 extra population presumably needing at least another 15,000 jobs. Even with the Airport Thanet is in trouble jobwise.</p> <p>In order to attract investment Thanet needs a vigorous upskilling and reskilling programme – the loss of the Broadstairs Campus and downsizing at the local FE College indicate that this not going to happen – so no great investment may be expected. Our schools are struggling and already occupy too many low positions in the national league tables.</p> <p>The Resolution Foundation identified the three most vulnerable sectors in the 'Fourth Industrial Revolution as Care, Retail and Public Sector. The earlier draft LP talked of a 'robust public sector' which rather undermined its credibility (do 'they' not read the papers ?) and the present offering seems to think that Thanet needs more 'shelf space' and ignores the online revolution (certainly 'they' do not read the papers.) Apart from the presently (long) empty retail properties Westwood Cross itself will need radical rethinking as a 'brownfield-in-waiting.'</p>		985		Email
Proctor	C	491			Object	<p>Unemployment in Thanet is the highest in Kent.</p> <p>The plan identifies Manston Business Park as providing large-scale job opportunities. This</p>		1367		Paper

						<p>prediction is hopeful but not definite. Numerous factories and businesses have started and failed over the years. I suggest one reason is because of the location. Thanet is an area surrounded on three sides by sea and unless the Government takes on a "Boris" style project and reclaims some land from the sea to improve the road network, this is not going to change!</p> <p>To establish a well-balanced community we should keep highly skilled and professional workers. The plan does not explain how this will happen. Schools and Hospitals are underfunded and as a result a large number of highly trained people we once had, have left, they cannot afford to keep them. Jobs in banking have disappeared. Birchington and Westgate have lost all the banks leaving people to travel to Margate or Canterbury.</p> <p>With hotter summers, tourism may improve, but with our close proximity to London, this is still likely to be day- trippers. Unfortunately this type of tourism is less lucrative. I hope things do improve, but to build houses for people with very little hope of employment is not what the government intended. (I hope!)</p>				
Ransom	Natasha	190	British Horse Society		Object	<p>There is a failure to understand the importance of equestrianism to the rural economy. The Manston Business Park will be located very close to Manston Riding Centre a riding school which has existed since at least the 1980s. Failure to identify equestrianism and equestrian tourism as a potential growth area in Thanet could have a strong negative impact.</p>	<p>SP02 is not consistent with policy 1.5. The plan should enhance and promote horse riding in Thanet and not make it more difficult.</p>	565		Web
Repsch	John	126			Object	<p>SP02 Employment Growth</p> <p>1. Job Growth Strategy</p> <p>1.15 "Thanet Earth is a prime example of cutting edge 'agritech' technology. It is important that sufficient employment land is available to facilitate any future growth."</p> <p>The only earth in Thanet Earth is in the name. The roots of Thanet Earth's vegetables are grown in an unnatural, hydroponic chemical solution. Covering Grade 1 agricultural soil with acres of concrete should be a criminal offence. Furthermore, the TE industrial site is guilty of gross urbanization of this rural area. It produces the 2nd worst light pollution in the UK, excessively lightening our night sky. The light needs reducing, not increasing. Expanding the site would push it towards becoming the No.1 light polluter.</p> <p>SP05 Manston Airport</p> <p>This site could become a major tourist attraction if days in the summer were set aside for Manston-at-War aerial dogfight displays, etc. Modern Manston could go hand-in-hand with historical Manston.</p>		284		Web
Samme	Linda	16	Manston Parish Council		Support	<p>Employment is desperately needed in Thanet, and without it nobody can afford the housing they are proposing. Airport will attract not only aviation businesses but all other types.</p>		259		Web
Samme	Linda	16	Manston Parish Council		Support	<p>The development of Manston Airport would be a good idea in co-operation with the port of Ramsgate expansion</p>		260		Web
Sarafoglou	Alex	134			Object	<p>Whilst Section 1.8 recognises employment potential arising from the port of Ramsgate from infrastructure and industry, it does not recognise the potential for employment arising from leisure and tourism. Whilst the current proposed services, including a passenger ferry, might not be economically viable on their own, a feasibility study should be conducted to consider if expanding the remit of the Port to include tourism and leisure may complement existing proposals and enhance the economic viability of the Port. As this section and current proposals from the Council have not considered a feasibility study of this nature, nor conducted a full and detailed review of the economic viability of the Port, I deem this document to be unsound on the basis that reasonable alternatives have not been fully considered, ie the following property that the plan is "justified" not been fulfilled: "justified (the most appropriate strategy when considered against</p>	<p>Add leisure and tourism as potential catalysts for economic growth in the Port of Ramsgate.</p>	335		Web

						reasonable alternatives, based on a proportionate evidence base)"				
Sitch	Sue	38	Mr		Object	5,000 jobs will not be anywhere enough. Currently unemployment in Thanet is already the highest employment rates in Kent. Looking to an estimated increase to the working population of 25,710 (17,140 x 1.5 per house, I know some of these homes are already built eg Westwood)	Reduce this plan by at least 50% and look at creating more than 5,000 jobs to support our current unemployment position. To know you live in an area where our rates are so high is only a demoralising position to our employable work force, this would inevitably lead to a higher homeless rates, more teenagers and young adults wondering the streets which could then increase the crime rates which will then lead to more people leaving the area. MARGATE!!!!. How is this better for our population	85		Web
Solly	C	419			Object	[See attachment]	Job creation in Thanet needs a review to fully understand the implications of a population growth of 27000 people. The figure for job creation (5000) has not changed despite the housing number being increased significantly.	1193	Solly SP02 comments.pdf (1.4 MB)	Email
Steel	Richard	43			Observation	The proposed housing development over the plan period is likely to increase the population by more than 50,000, set against which the additional 5.000 jobs envisaged are totally inadequate. Thanet already has relatively high unemployment, at close to 5%. The plan fails to demonstrate how the demand for jobs can be realistically met.	Development should only proceed as and when employment can be provided for the people who currently reside in Thanet as well as those who will be attracted into the district, and at a pace that ensures unemployment is not increased.	95		Web
Stevens	David	175			Observation	<p>Job Growth Strategy</p> <p>1.16 "Improving education and skills in Thanet in partnership with the private sector is an important part of growing the economy". RSP show in their plans that they wish to engage in the improvement of education and skills in Thanet but the DCO process is not mentioned in the Local Plan. This is a serious omission.</p> <p>1.17 The involvement of Canterbury Christ Church in promoting STEM is a very welcome development and one that will be further advanced by a revitalized Port and a reopened airport.</p> <p>1.22 The Economic Growth Strategy for Thanet identified transformational initiatives to focus on to deliver employment growth but makes no reference to the plan to reopen Manston Airport which has the potential to generate thousands of jobs.</p> <p>1.23 A target of 5,000 jobs does not make sense when part of the Local Plan includes provision for 17,140 dwellings. Either the job total is too low or the house numbers are too high or a combination of the two.</p> <p>1.24 "Job growth in the district will be supported, promoted and delivered by allocation and retention of employment land and premises that are fit for purpose across the district". Allocating Manston Airport for housing rather than retaining it for employment is a total contradiction with the statement above.</p> <p>In summary, I would urge that Policy SP02 be amended to include the plans to reopen Manston which have the potential to impact very positively on Job Growth.</p>	As stated above, Policy SP02 should include plans to reopen Manston and without it I do not feel that Thanet have "adopted the most appropriate strategy".	495		Web
Stevens	Angela	163			Object	<p>"The growth of the Port of Ramsgate is supported as a source of employment and as an attractor of inward investment."</p> <p>Policy SP02 needs amending, particularly regarding Port Ramsgate, which is losing</p>	Consider the profit-making options at Port Ramsgate instead of letting things stay as they are, losing £2.6Million per	583		Web

						<p>£2.6 Million per annum! Money has been wasted on building new berths for ships that don't exist any more. The harbour isn't deep enough for the type of ferries TDC are hoping to attract. The previous TDC Leader, Councillor. Chris Wells, was told over a year ago, by an expert retired able sea captain, that there is only one ship capable of sailing into Ramsgate Harbour and it is happily sailing in the Canaries and has no intention of moving to Thanet!</p> <p>Brett's are on the other side of the port, running an open and uncovered concrete factory without due diligence having been taken. They are costing TDC a lot of money due to an ill-founded contract. Residents have asked many times for proper due diligence and audited accounts to be done on Port Ramsgate, but have been ignored as usual.</p> <p>Residents want the losses to stop and have asked for a £30,000 feasibility study to be done regarding a marina village with shops and restaurants, instead of a concrete factory, which is proving to be a "vexation" to TDC officers, for some reason.</p>	annum, reducing spending on essential services in Thanet. Get proper reports done on Brett's vs an attractive and profitable marina village.			
Stevens	Angela	163			Observation	<p>No mention included of the massive job opportunities presented if Manston Airport reopens. The Azimuth Report by Dr Sally Dixon hasn't even been considered.</p> <p>No suitable ro-ro ferries exist, capable of sailing into Port Ramsgate. TDC continue to ignore this. A marina village would provide many more jobs than a concrete factory spewing out carcinogenic particles and causing residents to have respiratory problems.</p>	Job opportunities will exist in their thousands if the DCO to reopen Manston Airport is eventually accepted by the Secretary of State, who will consider the merits of the DCO examination. This is a serious omission.	584		Web
Sykes	Anthony	31			Observation	<p>This evidence does not stack up and is based on flimsy evidence. Manston could be a key to growth and may be the catalyst needed but this has a way to go before its presents is felt in the local economy. Retail will suffer with on line retail and larger stores at Westwood Cross are likely to close leaving a vacuum. Tourism may increase but that is a fragile economy. The increase of 5000 jobs in my opinion is overstated as current trends do not uphold this assumption.</p>	Because all the economic data does not support the assumptions made.	52		Web
Thompson	Andrew	162	Canterbury City Council		Observation	<p>We understand and appreciate Thanet's strategic economic ambitions and accompanying evidence base and in turn have no specific comments on this.</p>		474		Email
Trotter	AR & PJ	388			Observation	<p>EMPLOYMENT</p> <p>Thanet is a depressed area with high unemployment. Serious planning will need to be made to attract jobs to provide employment for the increase in population.</p>		1153		Paper
Twyman	Paul	324			Object	<p>SP02 and all the consequential references should revert to the original wording.</p>	SP02 and all the consequential references should revert to the original wording.	989		Email
Ward	Linda	157			Observation	<p>The only successful policy for economic growth so far has been the regeneration of the town centres for tourism and cultural expansion. This should be primary</p>		433		Web
Wheeler	Guy	113			Observation	<p>I wish, as a resident of Birchington on Sea, to raise my concerns and objections to the proposed local housing plan that has been presented by Thanet Council.</p> <p>The plan specifies a forecasted need for 17,140 houses to be built in Thanet, with 1,600 dwellings planned for fields adjacent to Canterbury Road in west Birchington.</p> <p>Councillors stated that the need for this number of new builds was as a result of the "Experian" commissioned report which forecasted economic growth over a twenty year period.</p> <p>When questioned, Councillors stated that the growth in the economy would be realised through two fundamental avenues, these being green tourism and green industry.</p> <p>Thanet Plan in General:</p> <p>No companies have been recorded as potentially showing an interest in Thanet in green technology or other aspects.</p>		239		Email

						<p>The use of green land, whether agricultural or green belt, would nullify their use as a tourist attraction and thereby destroying any potential growth in this sector and its associated support industries (hotel, catering and leisure support).</p> <p>The Government are under increasing pressure from energy companies to remove the green levy placed on them, and this would effectively remove any central government support for fledgling green companies to engage in a start- up style endeavour.</p> <p>A recent study has shown that green energy companies supplying solar panels for solar fields would only employ five full time staff and potentially around thirty part time employees, hardly justification for 17,140 homes?</p> <p>Additional research has shown that solar panel fields are detrimental to the ground on which they stand (they starve it of natural light) and this in turn can render the land of little use if panels are later removed.</p> <p>The use of solar panels is an eye-sore and will, without doubt detract from the appeal that is so vital to attract tourism.</p> <p>One must not forget that Thanet’s re-generation rests with its ability to re-invent it’s tourism base and consequently any over development that detracts from this is at best an “own goal”.</p> <p>In my experience in commissioning reports, such as that by Experian, one is always advised to seek a second opinion, usually by commissioning sub-reports on specific issues. This helps to qualify the validity of the main report. Has this been done by TDC?</p> <p>TDC’s plans for Ramsgate port show how little regard is placed on the potential recovery of tourism in the area (A previously proposed concrete works is hardly a “day at the seaside”!)</p> <p>There is no evidence that the Isle has the means for “inward investment” and for TDC to suggest that this is a viable reason for more housing is fundamentally without evidence.</p>				
Wraight	Kenneth	141	1959		Support	Tdc needs to make use of existing business parks to maximize the potential not have many parks with only a few businesses on each		357		Web

Employment Land SP03										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
.		408	Tesco Stores Ltd	Mark Buxton - RPS	Object	<p>We consider that in its present form Policy SP03 is unsound. The policy records that Thanet Reach Business Park is suitable for education uses as well as B1 and B8 uses but then does not seemingly categorise this as a ‘flexible employment site’ marked by an asterisk as per Eurokent (part). Policy SP07 allocates Thanet Reach Business Park for employment and education uses whilst allocating the southern part of the site for residential development. It is therefore clearly considered suitable for ‘flexible employment’ and this should be more explicitly set out in policy SP03.</p> <p>We also consider that the policy should be further revised as land at Millennium Way has been allocated as part of Thanet Reach Business Park for a number of years but has remained vacant having not generated any interest from the market for viable employment uses across the site.</p> <p>We therefore welcome additional flexibility in draft policy SP03 but consider this should go further. There is clearly a surplus of employment land in the District. Paragraph 1.28 of the</p>	<p>Reword policy SP03 to clarify the distinction between existing employment uses at Thanet Reach Business Park and its potential future expansion to the west (land north of Millennium Way).</p> <p>Clarify that the existing Thanet Reach Business Park is suitable for flexible employment uses (including education and B1/B8 uses) and that its potential future expansion (land north of Millennium Way) is suitable for wider</p>	1183		Email

						<p>Pre Submission Draft Local Plan establishes that Thanet will need c. 15ha of employment land (B1, B2, B8 uses) over the entire plan period; draft Policy SP02 allocates 53.5ha of employment space to 2031. Land at Thanet Reach Business Park is therefore not required to meet the future employment needs of the District and it should benefit from a more flexible allocation accordingly.</p> <p>Policy SP07 states that “development must be compatible with neighbouring uses”. As there are a number of residential developments surrounding the site and with the adjoining land south of Millennium Way allocated for residential development in the draft Local Plan we consider that the additional land at Thanet Reach Business Park (i.e. land north of Millennium Way) should be allocated for a wider mix of uses including residential. The ‘Economic Development in Thanet (Employment Land Update and Economic Needs Assessment)’ dated July 2018 acknowledges at paragraph 6.2 that “the amount of land allocated represents a significant oversupply of employment land.” Furthermore, paragraph 6.8 records that following a review in 2012, land at Thanet Reach (south) should no longer be allocated for employment purposes as it was not considered to contribute positively to the employment land strategy. We contend that the same should apply to ‘Thanet Reach (north)’ – i.e. our client’s land to the north of Millennium Way. We would also suggest that the draft plan should make a clearer distinction between existing employment uses at Thanet Reach Business Park and its potential future expansion to the west which is the land subject of our representations. The policies map makes this distinction but the plan text does not.</p>	employment generating uses and residential development.			
Cooper	Barbara	514	Kent County Council (KCC)		Object	KCC recommends that TDC considers whether this policy should also include a requirement to “seek to achieve at least a BREEAM Very Good rating”.		1491		Email
Dawes	Jenny	59			Support	Agree		153		Web
Ransom	Natasha	190	British Horse Society		Object	The Transport plan does not acknowledge where the Riding stables are in relation to the business Park at Manston and Hedgend Industrial Estate. If there is to be an increase in large vehicle movements, appropriate mitigations should be taken to ensure safety for horse riders in the area. Agree that "development must be compatible with neighbouring uses" and would like to see suggestions on how to mitigate? Off road alternative riding? Signage? Equestrian crossings?	Acknowledgement of the locations of key riding stables and riding routes and their economic benefits. Strategies which mitigate adverse affects of development sites.	566		Web
Samme	Linda	16	Manston Parish Council		Support	Eurokent business park is not attracting new customers. Some of the problems are down to road access from Lord of the Manor.		25		Web
Samme	Linda	16	Manston Parish Council		Support	Eurokent has stood empty for many years now, it would be nice to see it filled before further units built		261		Web
Solly	C	419			Object	<p>Paragraph 1.31 mentions Westwood Industrial Estate. This site should change the land use to housing. The site is in the wrong place ever since the development of Westwood Cross and does produce brownfield land in which to satisfy the need for housing. It is stated that it needs to be updated and renewed but there is little evidence that this will happen with this site. The estate is also within the new housing and the urban area between Ramsgate and Margate. It also borders the green wedge for which electricity pylons dominate the landscape in that area. Developed correctly this would enhance the area. It was also mentioned that neighbouring districts have concern of oversupply of employment land. There has been some high profile stories especially recently of a big fire which undoubtedly was due to an old unvalued factory area which was used to store waste for incineration. Also another fire in 2007 happened in this area at a chemical facility. This has cause a risk to human health directly and indirectly due its location. It would be more positive to try and enhance the area for housing and reasonable road link which would be</p>	<p>Reconsider Policy of Westwood Industrial estate and regenerate the area to housing. This would be in relation to paragraph 112 (NPPF 2012):</p> <p>112. Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek</p>	1194		Email

						made possible by linking Nash road and Margate road which could take some of the pressure of the road networks at Victoria traffic lights and Westwood orbital routes. News link: Fire after chemical factory blast (2007) http://news.bbc.co.uk/1/hi/england/kent/7151761.stm News link: Westwood Industrial blaze unit contained 6,000 bales of 'illegally stored' waste (2018) https://theisleofthanetnews.com/westwood-industrial-blaze-unit-contained-6000-bales-of-illegallystored-waste/	to use areas of poorer quality land in preference to that of a higher quality.			
Stevens	Angela	163			Observation	Manston Business Park is virtually empty, with no new businesses demanding the units. Dover DC have confirmed that there is no current demand for large industrial spaces in the area at the present time.	Once again the possible reopening of Manston Airport isn't even considered as a possibility, despite the DCO being accepted for examination as an NSIP.	585		Web

Manston Business Park SP04										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Bransfield	Sheila	456			Observation	<p>POLICY SP04 - MANSTON BUSINESS PARK</p> <p>In order to provide a Green Infrastructure, no further development should be allowed until the sewage waste is piped directly to Weatherlees Treatment Works. The current route is through Acol and Southern Water has consistently advised, since 2015, that there is insufficient capacity for additional waste. Neighbouring properties flood with overflowing sewage whenever there is an extended power cut. In 2015 Acol residents were assured no new businesses would be connected to existing sewer; a new pumping station would be built and the existing properties then linked into it.</p> <p>In accordance with Policy TP01, the Transport Assessment and Travel Plan must include the extension to Columbus Avenue, now prioritised by Kent Highways. Apparently it will cost £8m to build a single-carriageway connection. Acol villagers have been campaigning for this since 1996, when the first Cummins development was proposed, when the cost would have been much less. Public money was found to build Columbus Avenue, from the B2190, before the development began.</p>		1303		Email
China Gateway International Ltd.		503	China Gateway International Ltd.	Abraham Laker - RPS	Object	<p>As identified in Policy SP03 Land Allocated for Economic Development, it is clearly stated within paragraph 1.29 that forecasts show that Thanet will need in the region of 15 ha employment land (B1, B2 and B8 uses) over the plan period. Paragraph 1.32 states that a “flagship” site for inward investment that can also accommodate growing indigenous business is provided for at Manston Business Park.</p> <p>Paragraph 1.36, stipulates that the focus of the site should be office, industrial and warehousing, whilst some mixed use including additional business support services and training facilities, which demand a location outside of Westwood and off the coastal urban belt. These developments will be considered appropriate, where this would serve to attract new or support existing job creating development.</p> <p>Whilst we support the ongoing allocation of Manston Business Park for business and employment generating purposes for B1 (business), B2 (general industry) and B8 (storage and distribution) use classes. With the commercial process developing to become cleaner and quieter, we request that further consideration for the introduction of mixed use proposals that allow for the co-existence of employment and residential uses side by side should be explored further. Based on the foregoing, we recommend that land to the east of Manston Business Park is allocated for mixed use and residential development to support the inward investment and intensification of the Manston Business Park for employment uses. This approach will support</p> <p>the provision of both employment and housing land and provide a natural link to the existing residential properties along Spitfire Way leading to Bell-Davie Drive.</p> <p>In conclusion we consider that the Pre-submission Local Plan is currently unsound as there are concerns still to be addressed over the delivery timescales of several of the Strategic Housing Sites and housing allocations. We consider these issues mean it is unlikely that the Council will be able to ensure the delivery of sufficient housing during the initial years of the new development plan to meet its increased Objectively Assessed Need.</p> <p>Development of the three sites (Phases 1, 2 and 3) has the potential to provide a significant level of housing and employment opportunities, additional services and make a substantial contribution to the strategic vision and future growth of Thanet District as a whole.</p> <p>Accordingly, we strongly urge the Council to consider the inclusion of these sites as</p>		1413	Laker China Gateway.pdf (588 KB)	Email

						allocations within the emerging Local Plan..				
Cooper	Barbara	514	Kent County Council (KCC)		Object	KCC recommends that environmental services and biosecurity considerations could potentially be strengthened through the following small amendments to this policy: Provide Green Infrastructure accompanied by a Landscape and Ecological Management Plan to create and maintain an attractive and biodiverse environment compatible with its location and native planting for boundaries adjoining the countryside. Be accompanied by a transport assessment, travel plan and BREEAM assessment in accordance with Policy TP01.		1492		Email
Dawes	Jenny	59			Support	Support emphasis on green infrastructure		155		Web
Huckstep	Terence	40			Support	I fully support the development of the business park however as it is only 50% developed why would there be a need for SHP to propose a business park opposite this development?		89		Web
Johnson	Elisabeth	51	Monkton Residents Association		Observation	As previously stated the transport and travel plans for these developments will be key to their success.		122		Web
Mackay	Rebecca	10	Miss		Support	Public transport infrastructure improvement is essential in the Local Plan. The wording of this suggests it but doesn't specifically tell us that this will be the case - and it should be for Manston village as well as the Business park. What about improved infrastructure and how will the village be impacted on (esp on the single road in and out) by attracting 'warehousing' business?	More information and detail required I think.	19		Web
Ransom	Natasha	190	British Horse Society		Object	Transport to this site combined with any transport involved in a cargo hub is going to put massive pressures on the local road network. An adequate transport and travel plan will be crucial to this working. This policy needs to include acknowledgement of the proximity to Manston Riding Centre and other livery yards on Allend Grange Road.	Not clear what policy will be in place to prevent accidents with horse riders.	568		Web
Stevens	Angela	163			Object	See previous comments on Sp03 - Employment Land concerning Manston Business Park.	Include the prospects of the use of Manston Business Park, should the pending DCO by RSP be accepted.	589		Web

Manston Airport
(ex SP05)

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
.		408	Tesco Stores Ltd	Mark Buxton - RPS	Object	<p>We previously raised concerns on behalf of our client over Revised Policy SP05 for the proposed mixed- use allocation at the Former Manston Airport Site to provide at least 2,500 new dwellings and up to 85,000 sqm of employment and leisure floorspace. This policy has subsequently been deleted in the Pre Submission draft version of the Local Plan. We support the deletion of this policy and the Council's proposal not to allocate the Airport for mixed-use development.</p> <p>The Proposed Revisions version of the Local Plan relied heavily on the Former Manston Airport allocation to meet its elevated housing needs, with the site targeted to deliver 2,500 of the 17,140 additional dwellings required over the plan period. With outstanding questions relating to the viability of the future of Manston Airport and the timescale for its delivery, we considered that this was an unsound allocation.</p> <p>The deletion of mixed use allocation from draft Policy SP05 does though raise issues in respect of the Council's strategy for meeting the housing need over the Plan period. We have concerns over the intended approach in the Pre Submission Draft Local Plan. Our objections to draft policies SP14, SP15, SP18, and H02 should be read alongside this representation. We have concerns over the delivery rates assumed for these Strategic Housing Sites for the reasons set out in those objections and contend that other suitable sites capable of delivering housing in the next 5 years should be allocated to help meet the identified housing needs in the District.</p> <p>We submit that land north of Millennium Way is one such suitable site.</p>	No change on the basis Policy SP05 is proposed to be deleted from the Submission Local Plan.	1184		Email
Allison	Ralph	7			Object	The Avia report was independently determined to be flawed, and as such, there should be no reference to it in the Local Plan. Specific text must be included to protect Manston Airport for aviation purposes only, regardless of the current status of the development consent order.	Remove references to Avia report. Add specific text to protect Manston Airport for aviation purposes only.	10		Web
Alltoft	Wendy	196			Support	Surely Thanet will be better off with an airport to bring jobs and business to the area. How can building a high number of properties on the site help the area, we do not have the doctors, dentists, schools or road infrastructure to cope with this influx of people from outside the area. We should be looking to support the relaunch of the airport and use the existing properties within Thanet that are currently vandalised or going derelict and look to support housing Thanet people in these properties.		576		Web
Ansell		241			Object	The Local plan needs to be evidence based. All evidence confirms that an airport is not viable at Manston, including 16 years of failed operation and several expert reports. The existence of a speculative attempted DCO by a third party does not alter the legal requirement for the local plan to be evidence based at this time. In the unlikely event that the DCO is granted then the local plan can be altered accordingly. This part of the local plan is not justified because a reasonable alternative exists- mixed use development as proposed by the current owner.	The document is unsound because it is not evidence based. It is not justified because a reasonable alternative exists, namely mixed-use development as proposed by the owner of the site. It is not consistent with national policy because a) Manston has not been identified by government as part of future national aviation strategy. b) The refusal to allow housing on this brownfield site necessitates building on greenfield elsewhere in the district. The site should be allocated for mixed-	734		Web

							use development to make it legally compliant and sound. The existence of a speculative DCO application elsewhere does not prejudice this legal requirement.			
Austin	Patricia	379	Thanet Green Party		Object	<p>We understand that Thanet has been given an allocation of new housing, but deplore the plans to build some of this on rural and greenfield sites as a result of the controversy over Manston. We believe the Manston site is by far the best location for substantial housing development and a business park to create jobs. There is no evidence to suggest that aviation at Manston is needed and a long history of failed airports to show this will not work. The Heathrow commission did not consider Manston as an overflow for London because transport routes out of Thanet are unsuitable for large-scale haulage. The prospect of a 24 hour cargo hub at Manston is an appalling one, which even its proposers recognise in their documentation will have a significant adverse effect on the lives and wellbeing of the residents of Ramsgate, Minster and neighbouring areas. The air and noise pollution this would bring would damage the health of residents and would be the death knell of Thanet as a tourist destination in our view.</p>		1117		Web
Bailey	Ruth	65			Object	<p>My objection is over one word inserted into the motion at the last moment that could cause yet further years of inconclusive decisions over the airport site.</p> <p>I am an aviation supporter and have been a leading campaigner for Manston since the airport closed in March 2014. Since that date the airport has been continually used as a political football, no more so than when the first draft of the Local Plan was cynically voted down in January of this year. This wrangling over the airport has caused economic and developmental stagnation in Thanet and I am realistic enough to know there needs to be a final resolution either one way or the other.</p> <p>This is why I object to the fact that, at the last minute, when moving Option 2 of the draft Local Plan, the word 'minimum' was added to the Council's motion to say,</p> <p>"In the event that a DCO or CPO process is not accepted or granted, or does not proceed, the Council will need to consider the best use for this site, in the next Local Plan review after a minimum of two years."</p> <p>A 'minimum' denotes an inexact period which allows for yet more delay and confusion. The word is ambiguous, just how long is a 'minimum' of two years, how long could it be extended? It could surely open up a minefield of legal arguments in the future to keep this debate running indefinitely.</p> <p>It is totally unnecessary in any case because the timeline for the pending Development Consent Order for the airport site should be decided in a little over a year from now, by the end of 2019. If it is granted then the airport will be reopened. If it is not granted Thanet cannot afford further years of indecision.</p> <p>I contend, and I have raised with TDC's legal officer Tim Howes to no avail, that the wording was inserted incorrectly.</p> <p>To put it in context:-</p> <p>At an Extraordinary, Cabinet Meeting on Monday, 2nd July, 2018 just three Cabinet members selected Option 2 of the following two options.</p> <p>Option 1</p> <p>To publish the draft Plan for comment as recommended to Council in January (this is the recommendation of officers); that is, with the Airport site allocated for mixed-use development; or</p> <p>Option 2</p> <p>To publish a draft Plan which provides the opportunity for the Development consent Order (DCO) process for the Airport to continue, and re-allocates the 2,500 dwellings from the airport site to other locations within the district.</p>	<p>Remove the word 'minimum' and stipulate an end date of two years from the adoption of the Local Plan as was proposed by the Executive, Policy & Community Safety Scrutiny Panel whose wording was -</p> <p>"That the committee report at paragraph 2.11 and the draft Local Plan text be amended to indicate that if a DCO or CPO process has not been agreed within two years that the status of the site be reviewed."</p> <p>At least then we would have the assurance that there will be an end the economic stalemate caused by the arguments around the airport site once and for all.</p> <p>This would not effect the DCO decision which should have been made well before this time.</p>	176		Web

					<p>In voting for Option 2 the Cabinet, and subsequently full council, went against the advice of officers who published the following –</p> <p>ANNEX 3: RISK ASSESSMENT FOR OPTION 2</p> <p>There are a number of risks associated with Option 2 set out in this Report:</p> <p>(1) This approach is not fully aligned with the Council's own evidence base in respect of the viability of the Airport, and carries a higher risk of being found not sound. Whilst recognition of the DCO process is a relevant consideration, previous advice from MHCLG has been that the Local Plan should not be delayed for the DCO process.</p> <p>(2) Secondly, there is a risk that, if the DCO/CPO process does not proceed, the site may be available for housing in addition to the sites identified under this Option. To some extent, that risk may be mitigated by phasing some of the housing beyond the Plan period, but there remains a risk that Thanet could experience higher housing development during the Plan period than was previously anticipated.</p> <p>(3) Thirdly, there is a risk that having no policy to protect the airport (which the Council could not justify on the basis of evidence) means that there is a risk that a planning application/Appeal for development at the Airport could have a greater chance of success. However, that risk already exists (see above), so this is to recognise that this may represent an increased degree of risk.</p> <p>(4) If no decision is made by the Council in relation to the draft Local Plan, there is a significant risk of direct intervention by the Minister, a resulting loss of local control over the Local Plan and additional costs for the authority.</p> <p>https://democracy.thanet.gov.uk/ieListDocuments.aspx?CIId=151&MIId=5069&Ver=4</p> <p>This was followed by the extraordinary, Executive, Policy & Community Safety Scrutiny Panel on Wednesday, 11th July, 2018, After a long and heated debate, two recommendations were put forward by the committee -</p> <p>Councillor Bambridge proposed, Councillor Stuart Piper seconded and Members agreed to forward the following recommendations to Cabinet:</p> <p>That housing development being proposed in the Local Plan be phased to be implemented towards the end of the Plan period;</p> <p>That the committee report at paragraph 2.11 and the draft Local Plan text be amended to indicate that if a DCO or CPO process has not been agreed within two years that the status of the site be reviewed. (Please note: the word 'minimum' was not mentioned)</p> <p>https://democracy.thanet.gov.uk/mgAi.aspx?ID=32767</p> <p>Then at the Extraordinary, Cabinet Thursday, 19th July, 2018 2.00 pm</p> <p>Councillor Bayford proposed, Councillor Savage seconded and Cabinet agreed the recommendations of the Overview and Scrutiny Panel.</p> <p>However, that important word, 'minimum', was added, seemingly from nowhere, at the last minute and after the motion had been proposed and seconded as can be seen here in this video between 1.10 and 2.10 minutes –</p> <p>https://www.facebook.com/supportmanstonairport/videos/1042241749276770/</p> <p>I still maintain that adding this one word both went against procedure and opens up the Council to possible further, prolonged legal ramifications in the future leaving Thanet at an impasse.</p> <p>You may wish to view the full TDC Extraordinary Council meeting to hear the members arguments for and against the direction of this draft Local Plan which all focused on the Manston issue.</p> <p>https://www.youtube.com/watch?v=KN4fPXdqV-8&t=469s</p>				
bandola	margo	310		Object	The cargo airport would blight Ramsgate and SHP 's plans are of huge benefit to Thanet		921		Web

	t									
Barnett	J	135	Mrs		Object	<p>The only use for manston is as an airport. Its locality is perfect with little disturbance to local residents.</p> <p>Housing is not an option as the area needs this airport.it can help take the pressure off Heathrow. Due to its location it can easily send passengers to Amsterdam for connecting flights. This needs to be an option .</p>		340		Web
Barnett	David	146			Support	<p>Manston Airport should not be converted to a housing estate when there is an abundance of previously developed(brownfield) sites available throughout the district.The council should prioritise the development of such sites before utilising the airport site.</p>		453		Web
Bates	John	226			Object	<p>The existing, though lapsed, Local Plan (2006) sets out policies in relation to the Manston Airport site which were saved policies and are of particular relevance. The existing Local Plan recognises that the airport has one of the longest runways in the country and has the potential to fulfil a very important economic function, not just in Thanet but in the whole of East Kent, recognised as having high relative deprivation levels.</p> <p>However, Thanet District Council (TDC) in its wisdom has seen fit to propose changes to EC4 and its deletion after two years for the Draft Thanet Local Plan- 2031 Pre-Submission Publication</p> <p>It is clear from the political reaction to the published report of the Airports Commission led by Sir Howard Davies that the future of UK aviation policy is far from settled and that growth in the aviation market is set to continue to outstrip capacity. London Heathrow Airport (LHR) has been designated for the much needed 3rd runway but it will cost billions of pounds and take many years before its fruition. In the interim, utilising Manston Airport for Heathrow and Gatwick freight traffic could 'free up' airspace and help alleviate much of the pressure LGW and LHR are experiencing as 'overload'. Until these issues are resolved nationally, it would be entirely inappropriate for the potential of an airport such as Manston to be undermined by piecemeal development and an inappropriate change of use of its infrastructure.</p> <p>In particular policy EC2 of the existing adopted Local Plan supports the development and expansion of the airport.</p> <p>More specifically, existing policy EC4 states that land at the airport is reserved for airside development.</p> <p>Therefore I strongly support that the existing Policies EC4 and SP05 (or equivalent) should be retained.</p> <p>The proposals in the Draft Thanet Local Plan- 2031 Pre-Submission Publication are clearly contrary to these policies and until the future of the airport is known, they should be regarded as premature at best and at worst, positively damaging to the future prospects of the airport. RiverOak Strategic Partners (RSP) have submitted a Development Consent Order (DCO) which has been accepted by the Planning Inspectorate and is now in the pre-examination stage.</p> <p>There is nothing in the National Planning Policy Framework (NPPF) which specifically overrides these policies and indeed, given the sites potential to generate significant economic benefit through use as an airport, paragraph 19 of the NPPF could be argued to support the preservation of the site in its current form. This states that significant weight should be placed on the need to support economic growth through the planning system and therefore the applications should be resisted until it is known beyond all reasonable doubt that Manston cannot have a place in the country's aviation future. The report commissioned from Avia Solutions by Thanet District Council (TDC) in 2016, although accepted by TDC and used to make decisions on for the Draft Local Plan (Preferred Options) has to date been ridiculed by aviation and business experts alike for many numerous reasons, many of which were aired at the planning inquiry in Margate regarding changes of use of existing airport buildings.</p>	Existing Policies EC4 and SP05 (or equivalent) should be retained	701		Web

					<p>The old Local Plan Preferred Options (2015) indicated the Council’s direction of travel back then. That consultation document clearly showed the airport as an airport as a strategic employment site. That Plan intended to examine the future of the airport and pointed to the creation of an Area Action Plan. In these circumstances, even now, the introduction of non-airport related uses is premature and may prejudice the outcome of the Council’s deliberations through its new Local Plan (Preferred Options). Whilst this land is still designated for aviation use only, and so long as the Thanet Local Plan to 2031 is at draft stage and still unapproved, I feel no proposals to change its use can be approved or put into place. So long as interest is being expressed in retaining Manston as a fully functioning airport, and so long as there is strong local support for its role as an airport, I believe this part of the draft plan should be deleted.</p> <p>Manston Airport is Thanet’s major asset from a business point of view and only reinstatement of the airport, fully functioning, with aviation-related businesses associated with it, will provide Thanet with the employment opportunities in the long term that has been needed for so long. It has been proven that airports attract business. The draft business model that has been aired to date by RSP is a golden opportunity for Thanet to thrive. Previously, Manston as an airport has suffered through poor business models, poor management, a lack of foresight and insufficient investment. The vision to date by RiverOak will thwart what has gone before and is much anticipated – this opportunity must not be missed. There is every prospect of Manston Airport providing much needed employment in skills, hospitality and aero-engineering with a stressed importance on Science, Technology, Engineering and Mathematics (STEM), plus schemes linked with local businesses, suppliers and colleges leading to apprenticeship placements plus important and worthwhile employment at the very least. Current Aviation proposals for commercial development of the Manston Airport site, together support its future viability!</p> <p>Existing proposals include an integrated aviation services hub; a major international centre for air freight, an aircraft engineering facility, a flight training school, a fixed base operation for executive travel and business facilities for aviation related organisations. a cargo hub - offering quick turnaround - a centre for the environmentally safe decommissioning, dismantling and recycling of obsolete aircraft, airline pilot/crew training as well as private flying, servicing of aircraft, a diversionary airport in emergencies such as strike or weather conditions, and passenger flights.</p> <p>Therefore:</p> <p>Manston Airport is currently designated for Aviation use only, and should remain so. This major facility and business opportunity for East Kent would be lost forever if mixed development were ever to be an agreed option. A development of businesses supporting a revived airport is the only logical option for generations to come.</p> <p>Despite TDC’s claims that several thousand houses are required, they openly admit that there are at least 3,000 empty properties in Thanet which could be repurposed. This is despite that the true Government requirement for further new housing for Thanet, by 2031, stands at fewer than 7,000.</p> <p>Any plans for housing in Thanet would need significant associated infrastructure, such as electricity, gas, water and sewerage supplies, and availability of water in the southeast of England is already stretched.</p> <p>Nothing in national Policy EC4 that says the airport has to be functional for it to be considered. The fact the existing Local Plan is out of date is irrelevant to any existing arguments.</p> <p>There is adequate land available for commercial development at the adjacent Manston Business Park which could thrive with an airport on their doorstep.</p> <p>TDC have failed in a number of ways to liaise with adjoining local authorities regarding the Draft Local Plan (Preferred Options), especially with respect to housing, businesses and</p>				
--	--	--	--	--	--	--	--	--	--

						<p>Manston Airport – see Appendices A and B (section 14: pages 527-535). In finalising the Local Plan,</p> <p>TDC has a legal duty to cooperate with surrounding LPA'S (Local Planning Authorities) according to the Localism Act 2011. Dover District Council express disappointment that Thanet District Council did not comply with the 'Duty to Cooperate' prior to the publication of the draft Local Plan in terms of the future of MANSTON airport given that the future of the airport is a strategic cross boundary issue. According to DCLG Guidance March 2014, "The Local Plan examination will test whether a local planning authority has complied with the duty to cooperate. The Inspector will recommend that the Local Plan is not adopted if the duty has not been complied with and the examination will not proceed any further."</p>				
Bates	Alison	268			Support	<p>For Thanet employment opportunities need to be created and the only way that businesses can be attracted here so as to have that to happen is for Manston Airport to be given every opportunity to become fully operational again since airports anywhere attract employment. And it is employment that Thanet needs above any additional housing. Riveroak Strategic Partners (RSP) currently have a DCO submitted which has been accepted and will now follow the prescribed route as laid down in law. Steps with TDC had been taken to totally do away with the designations EC2 and EC4 of the existing albeit lapsed Local Plan but council has decided upon a convoluted improvement to that. However I still be believe the existing policies regarding the airport and SP05 should still be retained going forward as to ensure Manston Airport is retained for aviation use only. The facility is there. Any other use for it would be limited by the fact that it would cost too much to try and remove the existing runway and we would be burdened by a vast long open space forever which eventually no one would maintain. Manston Airport should be removed from the TDC Brown Field Register so as to ensure its proper use is maintained. Once we lose the airport it could never ever be recovered again if needed.</p>	<p>1. Retain existing policies in the new Local Plan, eg EC2, EC4 and SP05.</p> <p>2. Manston Airport should be removed from the TDC Brown Field Register</p>	813		Web
Bates	Zoe	288			Object	<p>The existing, though lapsed, Local Plan (2006) sets out policies in relation to the Manston Airport site which were saved policies and are of particular relevance. The existing Local Plan recognises that the airport has one of the longest runways in the country and has the potential to fulfil a very important economic function, not just in Thanet but in the whole of East Kent, recognised as having high relative deprivation levels.</p> <p>However, Thanet District Council (TDC) in its wisdom has seen fit to propose changes to EC4 and its deletion after two years for the Draft Thanet Local Plan- 2031 Pre-Submission Publication</p> <p>It is clear from the political reaction to the published report of the Airports Commission led by Sir Howard Davies that the future of UK aviation policy is far from settled and that growth in the aviation market is set to continue to outstrip capacity. London Heathrow Airport (LHR) has been designated for the much needed 3rd runway but it will cost billions of pounds and take many years before its fruition. In the interim, utilising Manston Airport for Heathrow and Gatwick freight traffic could 'free up' airspace and help alleviate much of the pressure LGW and LHR are experiencing as 'overload'. Until these issues are resolved nationally, it would be entirely inappropriate for the potential of an airport such as Manston to be undermined by piecemeal development and an inappropriate change of use of its infrastructure.</p> <p>In particular policy EC2 of the existing adopted Local Plan supports the development and expansion of the airport.</p> <p>More specifically, existing policy EC4 states that land at the airport is reserved for airside development.</p> <p>Therefore I strongly support that the existing Policies EC4 and SP05 (or equivalent) should be retained.</p> <p>The proposals in the Draft Thanet Local Plan- 2031 Pre-Submission Publication are clearly</p>	<p>1. Retain existing policies in the new Local Plan, eg EC2, EC4 and SP05.</p> <p>2. Manston Airport should be removed from the TDC Brown Field Register</p>	839		Web

					<p>contrary to these policies and until the future of the airport is known, they should be regarded as premature at best and at worst, positively damaging to the future prospects of the airport. RiverOak Strategic Partners (RSP) have submitted a Development Consent Order (DCO) which has been accepted by the Planning Inspectorate and is now in the pre-examination stage.</p> <p>There is nothing in the National Planning Policy Framework (NPPF) which specifically overrides these policies and indeed, given the sites potential to generate significant economic benefit through use as an airport, paragraph 19 of the NPPF could be argued to support the preservation of the site in its current form. This states that significant weight should be placed on the need to support economic growth through the planning system and therefore the applications should be resisted until it is known beyond all reasonable doubt that Manston cannot have a place in the country's aviation future. The report commissioned from Avia Solutions by Thanet District Council (TDC) in 2016, although accepted by TDC and used to make decisions on for the Draft Local Plan (Preferred Options) has to date been ridiculed by aviation and business experts alike for many numerous reasons, many of which were aired at the planning inquiry in Margate regarding changes of use of existing airport buildings.</p> <p>The old Local Plan Preferred Options (2015) indicated the Council's direction of travel back then. That consultation document clearly showed the airport as an airport as a strategic employment site. That Plan intended to examine the future of the airport and pointed to the creation of an Area Action Plan. In these circumstances, even now, the introduction of non-airport related uses is premature and may prejudice the outcome of the Council's deliberations through its new Local Plan (Preferred Options). Whilst this land is still designated for aviation use only, and so long as the Thanet Local Plan to 2031 is at draft stage and still unapproved, I feel no proposals to change its use can be approved or put into place. So long as interest is being expressed in retaining Manston as a fully functioning airport, and so long as there is strong local support for its role as an airport, I believe this part of the draft plan should be deleted.</p> <p>Manston Airport is Thanet's major asset from a business point of view and only reinstatement of the airport, fully functioning, with aviation-related businesses associated with it, will provide Thanet with the employment opportunities in the long term that has been needed for so long. It has been proven that airports attract business. The draft business model that has been aired to date by RSP is a golden opportunity for Thanet to thrive. Previously, Manston as an airport has suffered through poor business models, poor management, a lack of foresight and insufficient investment. The vision to date by RiverOak will thwart what has gone before and is much anticipated – this opportunity must not be missed. There is every prospect of Manston Airport providing much needed employment in skills, hospitality and aero-engineering with a stressed importance on Science, Technology, Engineering and Mathematics (STEM), plus schemes linked with local businesses, suppliers and colleges leading to apprenticeship placements plus important and worthwhile employment at the very least. Current Aviation proposals for commercial development of the Manston Airport site, together support its future viability!</p> <p>Existing proposals include an integrated aviation services hub; a major international centre for air freight, an aircraft engineering facility, a flight training school, a fixed base operation for executive travel and business facilities for aviation related organisations. a cargo hub - offering quick turnaround - a centre for the environmentally safe decommissioning, dismantling and recycling of obsolete aircraft, airline pilot/crew training as well as private flying, servicing of aircraft, a diversionary airport in emergencies such as strike or weather conditions, and passenger flights.</p> <p>Therefore: Manston Airport is currently designated for Aviation use only, and should remain so.</p>				
--	--	--	--	--	---	--	--	--	--

						<p>This major facility and business opportunity for East Kent would be lost forever if mixed development were ever to be an agreed option. A development of businesses supporting a revived airport is the only logical option for generations to come.</p> <p>Despite TDC’s claims that several thousand houses are required, they openly admit that there are at least 3,000 empty properties in Thanet which could be repurposed. This is despite that the true Government requirement for further new housing for Thanet, by 2031, stands at fewer than 7,000.</p> <p>Any plans for housing in Thanet would need significant associated infrastructure, such as electricity, gas, water and sewerage supplies, and availability of water in the southeast of England is already stretched.</p> <p>Nothing in national Policy EC4 that says the airport has to be functional for it to be considered. The fact the existing Local Plan is out of date is irrelevant to any existing arguments.</p> <p>There is adequate land available for commercial development at the adjacent Manston Business Park which could thrive with an airport on their doorstep.</p> <p>TDC have failed in a number of ways to liaise with adjoining local authorities regarding the Draft Local Plan (Preferred Options), especially with respect to housing, businesses and Manston Airport– see Appendices A and B (section 14: pages 527-535). In finalising the Local Plan,</p> <p>TDC has a legal duty to cooperate with surrounding LPA’S (Local Planning Authorities) according to the Localism Act 2011. Dover District Council express disappointment that Thanet District Council did not comply with the ‘Duty to Cooperate’ prior to the publication of the draft Local Plan in terms of the future of Manston airport given that the future of the airport is a strategic cross boundary issue. According to DCLG Guidance March 2014, “The Local Plan examination will test whether a local planning authority has complied with the duty to cooperate. The Inspector will recommend that the Local Plan is not adopted if the duty has not been complied with and the examination will not proceed any further.”</p>				
Bedingfie Id	Mark	206			Object	I believe that Manston should maintain the Ec4 and SP05 policies and protection. Further more it should not be on the TDC brown field list to protect Manston area for an airfield.		634		Web
Bishop	Carine	252			Support	I beleive the best use of the airport is to change use to houses.		766		Web
Bisset	Ross	244			Support	<p>Policies EC4 and SP05 should be retained or equivalent.</p> <p>Manston Airport should be removed from the TDC brown fields register.</p> <p>It has been an airport for a long time. With a carrier bringing in Americans to enjoy the isle of Thanet and then boarding a cruise ship in the Port of Ramsgate this will bring wealth and employment to this already beautiful area.</p> <p>Few people speak of the huge potential of this incredibly important piece of our coastline. It could be one of the best go to destinations in the south of England!</p>		746		Web
Blay	Ronald	137			Object	<p>Just a few thoughts on the local plan, Manston was marked out for mixed use, the present owners have set out their plans for a well ordered housing development on what is a large brown field site which includes medical centres, park areas, cycle paths, Olympic size pool, wave making and surfing centre, in addition it is hoped to get scientific research groups, instrument manufacturing, and various other manufacturing units to take up space there. The present owners have already put their stamp on what is now called Discovery Park Sandwich and what a fine job they have done. TDC have now thrown away what would have been a gem for the area by putting the brown field Manston site on the shelf because a lot of our councillors are backing RSP including our two MPs who are hoping to get a DCO to take Manston from the legal owners as they want to set up a freight terminal there. The last thing Ramsgate needs is planes flying over our homes 24/7 depriving us of our right to sleep at night, polluting the air, devaluing our homes,</p>	Start again with a new team.	343		Web

						interrupting school lessons. We desperately need homes for our young people that are affordable as it is every young couples dream to own the roof over their heads. We are now in a situation where houses will be plonked everywhere they can squeeze them in with little or no back up for shops schools, child care, doctors, dentists, and farmers will lose vital green belt land to the developers.				
boyle	Steve	199	Mr		Support	<p>Thanet is and was not designed to handle excessive amounts of people the isle is already buckling under the strain of too many people living in condensed areas and thanet council are not listening(as usual) to the people that live here. TDC are not supporting the area they just want to flood it with houses. It seems you are only changing your stance and allowing this consultation so that if the eco is granted you don't look as stupid as you sound in your plans. There is obviously a need for extra houses but to build thousands on manston will destroy the rest of the area. If ,as you claim,you have looked at other areas and the impact of masses of properties bundled in one place then you would not even be considering houses for manston airport. Look at kings hill a former airport the whole area around it is heavily congested now due to the amount of properties on the site. Many people avoid the area when trying to commute as it is chaos EVERY day and not just at peak times either. Thanet will suffer the same fate if you allow housing on manston and I would guess many residents will see it as the final straw and leave their history and heritage behind and get away from the area. This will not benefit anyone except the site owner and the house builders . I am 4th generation of my family that are born and bred in thanet and do not want to be forced out of my hometown by tdc poor planning decisions. At 45 years old i should not be forced to make decisions that will affect my children's future by moving our family out of thanet. Why should I?</p> <p>The whole saga of manston is a joke and if you allow the land banking fraudsters to cash in on manston with houses then tdc will become the biggest joke of a council in the country. For once do what the people want and find other more suitable areas to build the houses thanet needs for natural progression not force thousands of people into an isle already nearing capacity. TDC continually let down the resident who over the years have voted different administration into office on promises and lies,most people I know believe tdc is not for purpose and I feel if you allow housing on manston you will prove us right. TDC seems hell bent on selling thanet off bit by bit and people will eventually say enough is enough. Try and see past the pound signs and actually listen to your residents as they are the ones having to suffer your constant poor decisions. Manston must remain an airport and not houses. I have very little faith that the current administration or future ones will listen to these consultations as since tdc was formed a handful of people now established businesses have been running the towns into the ground. Please listen to the people that put you in charge of running their hometowns and serve them.as you should. No houses at manston.</p>	No housing at manston. Eco is going to make tdc look like fools. You should have backed it when you could and not listened to the money behind the group that want housing at manston. TDC have 1 last chance to redeem themselves so please do the right thing no housing at manston airport.	582		Web
bradley	christa bel	279			Object	<p>As a Ramsgate resident, I object in the strongest possible terms against the land at Manston being used by RSP for a cargo operation.The site is geographically unsuited to becoming a NSIP and the infrastructure is not in place to serve it. There is conclusive evidence that RSP would only be able to achieve commercial success if they allowed night flights, which is why, in their DCO application, they have applied for a limitless number. In the same document, they admit this would have a 'significant adverse effect' on Ramsgate and the villages, with a detrimental effect on quality of life. It would damage the environment, the tourist industry, the property market and the influx of those from other areas who earn their money away from Thanet, but spend it here, supporting the local economy and renovating houses. RSP is led by a struck-off solicitor with a dismal record in aviation and I do not support British-owned land being sold off to foreign investors in a</p>		823		Web

						shell company registered in Central America. The land at Manston must remain in the hands of SHP for mixed-use development to support Thanet's best chances of future economic survival.				
Bradley	Daniel	346			Object	<p>Please accept this as my response to the draft local plan. I believe that for the future prosperity and benefit of the whole of Thanet and the wider Kent area the policies EC4 and SP05 that currently protect the Manston airport site for aviation use only should remain in place. This is a nationally significant asset and needs to be protected, especially during which time the current Development Consent Order being sought by Riveroak Strategic Partners is in motion.</p> <p>I also believe that the Manston Airport site should be removed from the TDC brownfield register until such time that the DCO is either successful or discontinued.</p>		1035		Web
Brain	Dayle	401			Object	<p>MANSTON AIRPORT</p> <p>I will state, as I have many times in previous consultations, that I support the retention of Manston for aviation purposes only. The RSP proposals offer the people of Thanet chance not only of employment, but hope in the long term future of Thanet as a place of innovation, linking us to the rest of the UK and the world. And in a Brexit future, Thanet could play an important part in trade and commerce with Manston and a thriving port at Ramsgate.</p>		1168		Email
Bransfield	Sheila	456			Observation	<p>POLICY SP05 – MANSTON AIRPORT</p> <p>The government is currently considering a DCO, which I hope will be successful. Extra runway capacity is urgently required, nationally, to accommodate increasing air traffic. A new runway at Heathrow will be exorbitantly expensive and take a decade or longer to materialise. Manston Airport already exists and is also perfect for flight training and teaching specific aircraft engineering skills, which are woefully neglected in this country. Manston is one of the very few registered, authorised locations for tear-down of decommissioned aircraft to reclaim reusable and very valuable parts, which is an extremely lucrative business.</p> <p>In recent years, the government downgraded Thanet's Grade 1 Agricultural land, due to lack of rain and regular droughts. The recent rainy years are unusual and there is insufficient available water in Thanet for so many new properties.</p> <p>The sewage system cannot cope with the current outflow and would be unable to cope with more.</p> <p>There are fears of excessive numbers of air movements, but there were 28,000 flights in 2000 and 2001 and, in 1998, the MOD's last year, there were 38,000 flights. No one complained in those days. Also, contrary to unfounded "threats", engine noise and emissions from aircraft are strictly controlled, unlike diesel road vehicles. Aircraft companies are currently conducting tests with electric engines, so the future is likely to be even quieter.</p> <p>There are negative thoughts about the success of an airfield. Manston's catchment area would not provide sufficient passengers for a large terminal, but KLM successfully ferried people to Schiphol for onward flights around the world and they are anxious to return. Checking in and out at Manston is much quicker than other airports and road connections are conducive to a successful cargo business.</p> <p>One of the longest, thickest and widest runways in the country, at the highest point of Thanet, is not an appropriate site for housing and, apart from water supplies and waste disposal, our roads are often already gridlocked. Thousands of additional vehicles would bring Thanet to a standstill. Our schools, doctors' surgeries, hospitals and other public services are already struggling to cope.</p>		1304		Email
Bray	Francis	224			Observation	<p>Keeping Manston Airport is the answer to being able to create economic wealth and jobs for the prosperity of Thanet well beyond 2031.</p> <p>Manston as a freight airport will attract new business who need quick and secure access</p>		675		Web

					<p>to Continental Europe. Manston is the closest airport to Europe, and re-using Manston also as a passenger airport will attract the medium-skilled and highly-skilled people to Thanet; the very people that are being dissuaded by current policies by Thanet District Council (TDC).</p> <p>I was born and bred in Thanet, and it has always been my plan to return to the area sometime on my approach to retirement. Yet for someone who has worked in London since 1989, there is nothing that makes me want to come back. For me, I have Stansted Airport within easiest reach, and the thought of half a day's travel to an airport from Thanet turns me away from the region.</p> <p>Manston Airport is Thanet's golden egg, and TDC should be treating the airport as a golden legacy for making the region one that can sustain economic wealth for decades to come. There will always be a need for increased passenger growth because the UK is a country that embraces triple-digit inward migration annually, and that embracement is showing no signs of abatement. The airport is also something that would create jobs for local people, on top of the economic benefit and wealth-creation that Thanet will prosper from for a long time into the future.</p> <p>If Manston ceases to be an airport, to be replaced by thousands of units of living space, the whole of the Thanet area will lose a huge chunk of history at a stroke. The Royal Air Force at Manston played a vital and hugely important role in The Great War and World War 2, and re-vitalising its airport roots, for freight and/or just for passengers, is the only answer to keeping the historical importance tangible.</p> <p>The plan to build thousands of housing units on airport land that already has the basic infrastructure of a golden egg is reprehensible and short-termist. Yes, it would make a few councillors rich, but at the expense of keeping the region poor and downtrodden. Look at how Rochford and Southend have been re-vitalised since opening their former RAF base.</p> <p>For all these reasons, Manston Airport should be removed from the TDC Brown Field Register, the "Saved Policy from the 2006 Local Plan" EC4 should be retained, and Policy SP05 (or equivalent) should also be retained.</p>				
Bunce	Catherine	299		Support	<p>I support the reopening of Manston Airport which will bring the much needed jobs to this deprived area.</p> <p>Policies EC4 and SP05 should be reinstated and Manston Airport removed from The Brownfield Register..</p> <p>Manston Airport should remain and be supported by the council now and in the future</p>		870		Web
Burns	Rita	30		Object	<p>Having read the Local Plan I fail to understand why Manston has been designated for airport use only. There is no evidence to support this decision; my understanding is that some Councillors went against Officers advice so it appears that some Councillors voted against the interests of locals and the Community. It has been suggested that there is enough brownfield sites to build on but this Local Plan is now trying to put houses on greenfield sites when there is more than enough space at the Manston site which would enable villages to remain just that. Even Councillors that voted this plan in are now trying to move the extra houses from village to others than then having them on their doorstep. The Manston owners have all the necessary infrastructure on their plan but now the houses are planned for elsewhere there will be no supporting infrastructure. Various aviation experts say an airport at Manston is not viable so if it were to ever become an airport and then fail as is inevitable then the Government will just give Thanet even more houses than they require us to have now</p>		51		Web
Burns	Raymo	186		Object	<p>By protecting this site for aviation, the officers are preventing a potential mixed use</p>		539		Web

	nd					development which supports various beneficial aspects to Thanet. This is certainly not evidence based, the council employ Officers who are were against this being protection for aviation because it is not evidence based - councillors ignoring officer advice is surely not acceptable. Because of this decision houses are now being planned on greenfield sites without any infrastructure				
Caldwell	Lorraine	165			Object	<p>Two separate administrations tried and failed to seek out a viable indemnity partner for compulsory purchase of the site, with a view to reinstating aviation business operations. Every report (apart from one commissioned by the company wishing to compulsory purchase the site) concluded the site has no future as an airport, and aviation will never be financially viable or realistically deliverable at Manston.</p> <p>A majority of Cllrs chose to ignore Officer recommendations to lift the aviation only clause from the site, which ceased to operate as an airport four and a half years ago.</p> <p>Cllrs wishing to protect the site for aviation, are preventing potential mixed use development which supports tourism, leisure, industry, open spaces, community park land and sustainable housing development.</p> <p>Cllrs voting in favour of protecting the site for aviation, have done so without any credible evidence this is even viable. Their decision is based on nothing but chance, relying on the company which twice failed to meet due diligence as a potential indemnity partner, being granted a DCO.</p>	Remove the clause protecting the former airport as a site for aviation use only, and designate it as a mixed development site.	483		Web
Carr	Michael	209	Mr		Support	<p>I think that Manston Airport is of national interest as a Freight Hub, this would free up landing slots at Heathrow that may negate the need for a forth runway.</p> <p>When we have left the EU our trade withe the rest of the world will increase dramatically so airfreight is essential.</p> <p>I think that Policies EC4 and SP05 or equivalent should be retained and that Manston Airport should be removed from Thanet District Council's Brown Field Register.</p> <p>The amount of employment generated by a Freight Airport would be considerable in Warehousing, Freight Forwarding and Transport which would be of great benefit to Thanet's unemployment problems.</p>		637		Web
Carter	Viv	176			Observation	In the light of continued negotiations re leaving the EU, I think it is essential we retain the space for an airport- strategically close to the continent, it is a huge potential asset.		497		Web
Chapman	Brian	317			Object	<p>Thanet and the wider area would be better served if the Council concentrated on developing Brown Field sites rather than Green Field sites. The redundant airport is the obvious major Brown Field site.</p> <p>By supporting the return of aviation uses to Manston, and by association proposals by RiverOak Strategic Partners', the Council is supporting a considerable intensification in the airfield use over and above anything that has taken place in the past. This must have an adverse impact on surrounding residential, holiday and associated business uses from noise and air pollution, and, if the envisaged level of flights put forward by RiverOak is correct, a considerable increase in the number of heavy goods vehicles on Kents already crowded road system. Bearing in mind that the airfield is located at the eastern extremity of Kent, a long distance from any major manufacturing or business hub within the country, the airfield use cannot be sustainable as it must result in an increase in long haul road transport leading to more congestion and pollution. the use of an airfield as a cargo hub should reduce and shorten goods vehicle movements not increase them.</p> <p>The intensification of the airfield use will lead to a reduction in the residential amenities of a large proportion of the residents of Ramsgate, in particular if night flights are involved. Notwithstanding this if the council must support continued aviation at Manston this should only be on the basis of no night flights, scheduled or otherwise. The former Section 106 agreement failed in this respect as the majority of cargo flights are unscheduled. No night flight should be enshrined into the Local Plan.</p> <p>The flight path into and out of the airfield is over an increasingly large residential area as</p>		972		Email

						<p>well as schools and business uses, an area that will grow further with the agreed development at Manston Green. The reintroduction of aircraft movements, and the intensification of such movements day and night, will increase noise pollution, result in significant risk to the health of local residents, have an adverse impact on local schools, increase pollution and environmental damage generally, and result in potential damage to currently growing tourism industry.</p> <p>Residential development required by the Local Plan would be best served by allowing development of the airfield site, a site that represents the largest Brown Field site in the area. This would allow the design and construction of a sustainable settlement with all the services required. The need to release Green Field sites would be reduced. Adverse impact from aviation uses would be removed once and for all.</p>				
Chappell	J	6			Object	<p>The Local Plan must be evidence based.</p> <p>TDC has had a wealth of experience of failure of Manston as a commercial airport: twice it has engaged fruitlessly with a would-be partner in a CPO attempt; twice it has engaged in periods of soft market testing, to no avail.</p> <p>In 2016 TDC engaged the services of Avia Solutions to produce a report into the viability or otherwise of commercial aviation at Manston. Avia revisited its report in Aug 2017 with the following conclusions:</p> <p>'AviaSolutions has reviewed the Local Plan Representations that referred specifically to Avia Solutions' earlier report prepared for Thanet District Council "Commercial Viability of Manston Airport" (September 2016) that Thanet District Council is using as evidence in the Local Plan process.</p> <p>Avia Solutions' opinion, based on updated market information since the publication of our previous study, is consistent with our earlier view that Manston Airport does not represent a financially viable investment opportunity under normal market conditions'</p> <p>A DCO is currently before the Planning Inspectorate. Were a DCO to be granted, it would take precedence over any Local Plan.</p> <p>It is absurd, therefore, that the proposed Local Plan should have any consideration at all for Aviation at Manston. The evidence sought by TDC through the expertise of Avia Solutions concludes that commercial aviation is unlikely to succeed at Manston. There is no evidence to support the notion of aviation at Manston. The Local Plan should not have any consideration for Aviation at Manston.</p>	Take heed of the evidence.	9		Web
China Gateway International Ltd.		503	China Gateway International Ltd.	Abraham Laker - RPS	Support	<p>Previously, Policy SP05 proposed for a mixed-use allocation at the Former Manston Airport Site to provide at least 2,500 new dwellings and up to 85,000 sqm of employment and leisure floorspace. Paragraph 1.41 identifies that because the application for a Development Consent Order has been submitted and accepted for the pre-examination stage by the Planning Inspectorate (PINS). It is the Council's view to ensure that the NSIP-DCO is not prejudiced, the Council is proposing not to allocate the Airport site for any specific purpose in the draft Local Plan.</p> <p>We support the deletion of this policy and the Council's proposal to not allocate the Airport for mixed-use development.</p> <p>The Proposed Revision version of the Local Plan relied heavily on the Former Manston Airport allocation, with the site targeted to deliver 2,500 of the 17,140 additional dwellings required over the plan period. With outstanding questions relating to the viability of the future of Manston Airport and the timescales for delivery, we considered that this was an inappropriate allocation.</p>		1415		Email
Cleaver	Gillian	403			Object	I feel as ever, it is important to bring Manston Airport into the equation. It is of vital		1173		Web

						<p>importance that Manston is preserved solely for aviation purposes. It can be a massively important asset that will provide much needed employment to this depressed area and will ultimately become a part of the desperately needed air space capacity for the southeast of England. It is vital that we are not left behind or isolated as a community, and Manston will give us an opportunity to stay connected. It is imperative that houses are not built on this land.</p> <p>I also believe in any case, that this land is too contaminated with aviation fuel to entertain such an endeavour.</p> <p>Local support to maintain the airport is overwhelming, and the Council need to take note of local opinion, rather than pretending the situation is otherwise. The proposal of such large housing numbers are, I feel, unrealistic; unneeded and would do much to destroy the character of the area.</p>				
Cocks	G C	104			Object	<p>Manston will not achieve commercial status from the resulting Air Movements. History has shown us that it is not sustainable. I believe it will become a Commercial Graveyard to enable the Breaking of Aircraft as its main priority. HAVE NO HESITATION TO SAY I DO NOT SUPPORT THE AIRPORT AS I DO NOT THINK THE CASE HAS BEEN MADE FINANCIALLY. THE USE SHOULD BE COMMUNITY BASED AS SET OUT BY THE CURRENT OWNERS.</p>		256		Email
cole	john	305			Object	<p>Manston Airport should be removed from the brown field Register and policies EC4 and SP05 retained</p>	<p>Manston Airport should be removed from brown field register and policies EC4 and SP05 kept</p>	898		Web
Cook	Margaret	193			Object	<p>Objection to the number of houses for Thanet Policy SP05 and EC4 should be retained.</p>	<p>Manston Airport should be removed from brown field register. Houses are allocated to be built on grade 1 growing land.</p>	551		Web
Coombs	Joshua	292			Support	<p>Manston Airport should be used for MIXED DEVELOPMENT so that housing is not allocated on Grade 1 Agricultural Land. The associated jobs will come from the Mixed Development and Stone Hill Park proposals.</p>		855		Web
CROOK	ANDREW	27			Object	<p>Dear Sirs, since you have elected now to include manston airport into the local plan I am horrified that you could possibly think that to reopen the airport as a hub with 747 jumbo jets flying over Nethercourt Estate would be acceptable to families living under or near the flight path. As I live directly under the flight path let me tell you that before manston closed it was awful with the noise and vibration from these planes, that was just a couple of times a day !! To expect us to put up with a hub constantly flying overhead you must live nowhere near this ridiculous outrageous proposed scheme, like Roger Gale who lives miles away just trying to win favour with the electorate for more votes. Would he put up with all the disruption noise and invasion of human rights?? The value of our property will fall, are you to compensate us all ??? you will need a massive noise insulation scheme and possibly deal with human rights, we have rights to certain values in life, loss of sleep and stress related issues will be rather a problem for you!! To fly these huge planes over residential areas is a danger if the worst happened as their altitude is so very low on the approach to landing. All those persons for the REOPENING of manston who now have been told that additional housing will now be built in their locality INSTEAD OF MANSTON are now complaining of the disruption and loss of agricultural land !!!! Now it's affecting their lives, now they want STONEHILL PARK NOT the folly of a hub waiting to fail once again. Stone hill caters for all not the few. All we ever hear about is the pro manston comments, but there is a silent majority who are waiting patiently to vote against this insane idea of compulsory purchase that will destroy the up and coming Ramsgate now with Wetherspoons and a Cafe Culture and even a new Marina, do you want to destroy all this with cargo planes and blocked roads in a residential area?? The owners of Manston will sue if you dare to take their property, it will take years to reach a good outcome for</p>		48		Web

						Ramsgate DON'T LOSE STONEHILL PARK. CROOK MRS BRENDA CROOK	MR ANDREW P				
Crutchlow	Mark	426			Object	Manston Airport- somewhat out of your hands now with the DCO in progress but kicking the can down the road for the last 4 years and not actually robustly supporting the important asset and a "unique selling point" for Thanet, Kent AND the South East raises concerns that plans for the site that do not involve aviation have been pre-determined. This leads many including myself to question just how much of this plan, now out for "consultation" has also been pre-determined and therefore whatever the residents say will be ignored and carried out anyway? It boils down to a simple matter of trust. Is this a local plan for local people? Or a hastily cobbled together plan that ticks boxes? We are disappointed to say the least, we deserve better. You have let us down again			1218		Email
Culver	John	13			Object	In my view, a freight hub at Manston would be extremely detrimental to the whole of Thanet. It would probably make some money for a few people, but the residents of Thanet, Ramsgate in particular, would have their lives disrupted and polluted by air freight. If the desire is for Thanet to prosper, then turning it into some sort of industrial aviation wasteland is not the answer, but perhaps the "powers that be" are not really interested in the people of Thanet at all.			22		Web
Dale	Joanne	234			Observation	Suggest that Manston airport area be best used as a woodland park; a combination of country park like Betteshanger Park) and a holiday park site like the Center Parcs model.. there would be no need for further argument as to whether the site is suitable for aviation or housing. It would generate income in the form of tourism and create much needed jobs for the local population. There are few wild spaces in Than st, as the area is mostly urban development and farming. A new woodland could help foster wildlife before it disappears from our countryside. This eco-park in Sheffield provides another inspiration https://www.sheffield.a.c..uk/about/city/news/love-square-landscape-research-city-eco-park-1.592587 https://www.guardian.com/commentisfree/2018/2018/mar/26/wildlife-modern-farming-insects-birds?CMP=share_btn_fb			714		Web
Dance	Joseph	284	Ramsgate Resident		Object	Given that a number of reports, including those commissioned by Thanet District Council itself, have shown that an airport operating from the Manston site is unlikely to be financially viable or provide a significant number of 'quality' employment opportunities, would it not make more sense for Thanet District Council to support the existing owner's plans for the site, including a mixture of leisure, housing and business use? Additionally, a functioning cargo hub at the Manston site would cause irreparable damage to Ramsgate's domestic and tourist economy (plus those of Broadstairs and Margate) and would have a highly adverse impact on the quality of life of Ramsgate residents, in terms of peaceful enjoyment of their homes and gardens, physical and mental health, and sleep deprivation from potential night flights. I would ask Thanet District Council to reconsider it's current position on the Manston site and work with the current owners to develop a more positive and beneficial outcome for the whole of Thanet, and Ramsgate in particular.	In order to be considered 'justified' the policy would need to represent 'the most appropriate strategy when considered against reasonable alternatives, based on a proportionate evidence base'. For the reasons stated above, I do not believe the policy currently represents the most appropriate strategy for the development of the Manston site. I would ask Thanet District Council to reconsider it's current position on the Manston site and work with the current owners to develop a more positive and beneficial outcome for the whole of Thanet, and Ramsgate in particular.		828		Web
Dawes	Jenny	59			Object	Strongly object to this short-sighted inclusion that puts the rest of the plan in jeopardy and casts a blight over the regeneration of Ramsgate	Omit		152		Web
DE PULFORD	Mark	421			Object	I couldn't make your site work for some reason so am hoping that you will register the following as a comment from a local homeowner (Mark de Pulford)			1199		Web

					<p>in response to the Local Plan consultation.</p> <p>My comment concerns the policy now being put forward by the Council regarding the future use of the former Manston airfield.</p> <p>As I read it, the Council is proposing to leave the district's largest brown field site effectively derelict and without any planning purpose. That does not seem a good idea at all.</p> <p>The Plan document states that "To ensure that the NSIP-DCO process is not prejudiced, the Council is proposing not to allocate the Airport site for any specific purpose in the draft Local Plan."</p> <p>However, a Government decision to grant a development control order to would override any local planning decision. Therefore the process could not be "prejudiced" by the Council (as is stated in the policy analysis), rather a Council decision to earmark the site for mixed use would simply be taken into account as a possible use for the site, were the project not to be granted NSIP status and a DCO.</p> <p>I note that in January 2018 the draft Local Plan policy SPOS allocated the disused airfield at Manston for mixed development, including 2,500 homes. The draft Local Plan said: "Based on SA assessment, option NSS (the former airport site) was deemed the most likely opportunity to provide a sustainable new settlement due to its size, which would allow comprehensive provision of uses and facilities, and its unique status amongst options as a brownfield site." This decision reflected independent expert advice on the viability of the disused airfield site as an airport. This was entirely in line with previous expert advice obtained by the Council. There is no expert advice independent of the current applicant for a DCO that suggests that the site is capable of being redeveloped as a viable airport. The change in policy appears to be entirely political, with no sound basis in evidence.</p> <p>It is also a matter for concern that some Councillors who voted to remove the airfield from the Local Plan as a strategic mixed use site said that they did so because they did not wish to boost the value of the site, thus reducing the profits potentially available to the DCO applicant. Though their thinking may be based on a misunderstanding of compensation law, it remains an illegitimate and invalid basis for determination of a Local Plan policy.</p> <p>I am very concerned that the Council's decision has brought into play as housing allocations a number of green field sites that had previously been rejected or not needed for this Plan. That consequence goes against the Government's policy that brown field development should be preferred wherever possible over greenfield development. It will have an adverse impact on my village as well as on the character of other rural parts of Thanet.</p> <p>The proposed policy appears to be irrational and unreasonable. Whilst I appreciate that it was the majority view of the Conservative group plus some others, I hope that wiser counsels may yet prevail. The policy is complete crap.</p> <p>Thanks</p>				
Dove	Clare	298		Object	<p>To hold back on allowing RSP to apply and have their plans considered for a DCO is a neglect of a duty of care to the citizens of Thanet and in particular Ramsgate. To even consider what is in effect a fantasy proposal against a background of a history of airport commercial failure and the realistic aims and objectives offered by Stone Hill Park, in my view is a dereliction of duty by the majority of our elected councillors. It also continues to blight the property in Ramsgate. RSP's proposal can only be economic with unscheduled night-flights if it is to compete with other UK airports. The lack of night-flights elsewhere is based on the detrimental health effects to local people, habitats and environments. We have one of the most beautiful harbours, seascapes, Marine Conservation Zones, Bird and Wildlife protection areas and chalk reef in the UK and Europe. An example of pollution</p>	Close the airport once and for all!	868		Web

						<p>into these protected areas is that the surface runoff pipe from the airport flows directly into Pegwell Bay. Adding deadly aviation fuel and anti-freeze to these protected habitats is potentially criminal.</p> <p>I object to any consideration for a future airport that will operate 24/7 365 as a cargo hub. I have already suffered from atrial fibrillation when the night flights previously disturbed my sleep. Furthermore, I have tinnitus and hyperacusis. Any loud noise worsens these hearing /sensory problems with aircraft flying over my house at approximately 700ft and less. Depending on the wind direction this can be louder. The stress and related health problems that this RSP proposal will bring to Thanet, intense pollution within 3 square miles and up to six square miles from the airport is a threat to public health. Why our politicians think that this is acceptable is beyond reason.</p>				
Dunn	Danielle	499	Broadstairs & St. Peter's Town Council		Support	The Town Council supports the removal of SP05 and the renaming of the section to Manston Airport.		1401		Email
Eagle	Julian	212	None		Object	<p>I note that reference is made to the Avia Solutions report with reference to the Manston Airport site. This report contains a specific and clear disclaimer saying that it "should not be used for planning purposes". Accordingly it should not be referred to in reference to the Local Plan or any other planning matter. The acceptance of the RSP DCO for examination indicates that the Avia Solutions Report has been examined by The Planning Inspectorate and its findings rejected so please stop referring to its findings; it is a dead document. Preserving Manston Airport for aviation use is in full accordance with NPPF government policy for aviation and the mandate granted by the electorate. Inspector Nunn pointed this out to yourself's, before policy with regard to protecting airport sites made stronger. Please stop ignoring government guidance and preserve Manston Airport for aviation use in perpetuity.</p> <p>If you are in need of alternative sites for house building in Thanet look here :http://rsp.co.uk/documents/rsp-documents/rps-housing-and-employment-need-in-thanet-report-january-2018/ or at the many other brownfield sites that are in clear site but not included in the RSP report.</p>	Drop all reference to the Avia Solutions Report and preserve Manston Airport for aviation use in perpetuity in accordance with NPPF and Government Policy for Aviation. Adopt the (PINS accepted) RSP (relevant) reports on viability as a wider justification for keeping Manston Airport for aviation usage even if the DCO is not granted, because there has been a huge across the board expansion in the requirement for airport capacity in the UK since 2013 and the redevelopment of Manston Airport has now been accepted by government as a Nationally Significant Infrastructure project.	644		Web
eaves		188			Object	Despite such conclusive evidence to the contrary the council persists in supporting the hopeless Manston airport. Another scheme in the pipeline, more uncertainty for residents and a wasted opportunity to develop it into something different. We have to put up with our villages being built on just so that Manston can be saved and its not good enough. We don't want a noisy dirty cargo airport. How does that meet the needs of a tourism and green based economy? It is extremely muddled thinking. Caused by politics and not evidence.		542		Web
Edgington	Kim	201			Object	<p>In the 16 years since Manston was privately owned it lost £100 million. It never made a penny in profit.</p> <p>Since the airport closed over 4.5 years ago there have been several expert reports commissioned to find out the viability of an airport at Manston. Starting with the Davies report who dismissed Manston out of hand. Following that there were reports by Falcon, Avia, York Aviation, PWC and most recently Altitude Aviation. All, with the exception (unsurprisingly) of that commissioned by the company trying to DO the airport state that the airport is just not viable.</p> <p>If the airport will only work by having night flights then all Councillors should look at the</p>	Remove the designation of 'aviation use only' on the former Manston airport site. Designate the land as 'mixed use' development site without delay.	614		Web

						<p>only official poll which was commissioned by TDC and executed by MORI who concluded that 73% of Ramsgate residents did not want night flights and Thanet as a whole voted similarly that night flights are not acceptable. RSP and Roger Gale continue to say they don't want scheduled night lights and that these are not required. However, night flights are almost always CHARTERED flights and so the deception goes on.</p> <p>A majority of Councillors chose to ignore Officer recommendations to lift the 'aviation only' clause from the site and change it to 'mixed-use' but shamefully these Councillors could not see the sense that if the site is deemed as 'mixed-use' that would not rule out aviation use should the DCO be successful. Instead these Councillors chose to vote from a personal stance which is undemocratic at the very least.</p> <p>The Local Plan should show the Manston site for mixed-use only.</p>				
Elbourn	Bernard	131			Object	<p>Avia report clearly states that the document should not be used for Planning Purposes. Basing strategy on this report is a nonsense. Manston Airport is an excellent national asset and must be protected for Aviation for the entire duration of this plan.</p>	Retain the Manston Airport site for aviation use. Existing registers of land use and existing policies EC4 and SP05 reserving Manston for aviation use only must also be retained.	547		Web
Everest	Penny	179			Observation	<p>Manston Airport could be opened as a Cargo Airport (infrastructure is in place River Oak still keen) this could provide local jobs and relieve Gatwick and Heathrow of cargo space which surely could be used for the increased demand for more passenger flights.</p>		509		Paper
Everest	Michael	210			Observation	<p>No decision has been made on Manston remaining as an Airport (cargo). Reopen it as a cargo airport to provide employment and relieve much needed airspace for more passenger flights at Gatwick and Heathrow. The proposed Parkway Station would be of great benefit. It has also been proposed to use Manston for housing and commercial units creating Marston Green. However it is understood that there is pollution on the airport site and removing the concrete runway could interfere with the Aquifer in this area.</p>		639		Paper
Fairbrass	Lin	258			Object	<p>The UKIP and Independent Group at Thanet District Council wish to place on record for the examination in public the politicised and shameful route to the DLP which comes before you today.</p> <p>The whole plan has been distorted by political campaigning around an airport which closed in May 2014. The Manston Airport site has been used as a political football ever since, and has been the subject of considerably manipulated and politicised messages exploiting the emotion of campaigners and residents. Since May 2014, the council has carried out a number of exercises to identify a CPO indemnity partner. However following a number of unsuccessful exercises, in June 2016 this process was discontinued.</p> <p>Some informal approaches were made from potential parties who expressed an interest in the Manston Airport Site but no formal contact was made to Officers nor were any direct submissions of interest received by the Council.</p> <p>The Council sought to establish the status of Manston Airport through the Local Plan process and sought specific legal advice on how that might be achieved. The advice received from lawyers was that we needed to establish whether there was any likelihood of a viable airport during the local plan period, as the Local Plan has to be soundly based on a robust, credible evidence base.</p> <p>The Council therefore commissioned Avia Solutions as independent aviation experts to advise the Council on the viability of Manston Airport.</p> <p>Their report concluded that 'airport operations at Manston are very unlikely to be financially viable in the longer term and almost certainly not possible in the period to 2031' The site is largely previously-developed, and was subsequently identified for mixed-use development in Proposed revisions to the draft plan, published for consultation in January 2017.</p>	To proceed to Submission as recommended to Council on 18th January 2018, including the allocation of Manston Airport for mixed-use development, including 2,500 dwellings and if necessary include a deferment clause for a two year period to allow the DCO process to reach its conclusion.	785		Web

					<p>In the meantime, having been twice rejected as an indemnity partner for a CPO, RiverOak, in their new guise of Riveroak Strategic Partners, decided to proceed with their ambitions through a potential DCO on the basis that Manston is a nationally significant infrastructure project (NSIP). That process continues independently of the Council and the Local Plan process.</p> <p>The council took external planning advice in October/ November 2017 that indicated that the draft local plan as recommended to council, would meet the tests of soundness, and officers did everything necessary to ensure that a sound plan would be published.</p> <p>Whilst the DCO (if accepted) would replace the Local Plan policies for Manston, there remained a continued wish amongst some Members to provide support to a future aviation use in the Local Plan. Legal advice was obtained on how this might be achieved, and the advice was, it could be achieved by deferring the mixed-use designation pending the resolution of the DCO process.</p> <p>Officers at senior level discussed with members the possibility of including a clause in the relevant draft policy that would effectively defer the allocation on the airport site for a period of 2 years. This would allow the proposed DCO to be submitted and considered. This deferral would also allow any other interested parties to pursue the operational use of the airport through agreement with landowners or through becoming an indemnity partner as part of CPO process with the Council.</p> <p>However a majority of members rejected this option.</p> <p>The revised proposal would have read: The site proposals are deferred for a period of two years. In the event that a DCO or CPO supporting aviation use is accepted within that two years (or the landowner operates a commercial airport at the site within that time) the allocation specified in this policy will not take effect.</p> <p>The officer risk assessment for the current option for the airport site stated that it is not aligned with the councils own evidence base and carries a higher risk of being found unsound.</p> <p>It also stated that The Council couldn't justify on the basis of its own evidence having a 'NO POLICY' on the airport site. Previous advice from MHCLG has been NOT to delay for a DCO process, as a successful DCO will override any other policy</p> <p>The current option results in the possibility of less sustainable options coming forward and is likely to place permanent pressure on local resources and infrastructure</p> <p>2500 houses have now been allocated across the green fields of Thanet. The original proposal for mixed use on this site would have allowed time to reconsider those options in the event of a DCO application being successful.</p> <p>In truth, the Council finds itself with a politicised Local Plan, lacking proper evidence or coherent structure, which is, in the opinion of this group, potentially unsound. Councillors in Thanet have previously driven the Council to the brink of financial ruin by backing an emotional campaign against live animal exports, which legal opinion and officers had opposed. Once again, emotion has been made more important than fact; opinion is permitted to trump evidence; and a long delayed complex supposedly evidence based process has been cast into serious doubt in its soundness by Councillors failure to listen to advice, and face the truth.</p> <p>There is no credible independent evidence across the range of documents produced by RSP to underpin the business case. The public consultations undertaken have presented a very different picture to the details of operation contained in the application itself. As a result it is almost farcical to entertain the notion of effective consultation. Rather the public consultation undertaken has deliberately presented a very different picture to that which emerges throughout the application; particularly in terms of noise, vibration, pollution, and impact upon residents.</p> <p>Furthermore, this 'public relations' aspect of what should be an honest appraisal of the</p>				
--	--	--	--	--	---	--	--	--	--

						<p>proposal continues to mar the process. The local MP, Sir Roger Gale, known locally as the MP for Riveroak, constantly pumps out the message there will be only emergency night flights; the detail of the application tells a very different story. The current Leader of Thanet District Council, Bob Bayford, breached his powers when before becoming Leader he wrote undermining independent legal opinion and evidence about the consultation from his own Council Officers. This has been used by RSP to discount criticism of their consultation failings, and appears to have been accepted by PINS as real and substantive when it is at best a false interpretation of poor wording; at worst a bare faced lie. As a result what sits before you for examination is unsound, lacks truth and moral compass, and ill serves both the DLP process, and the future needs of the local population.</p>				
Favell	Dorothy	490			Object	<p>Manston Airport</p> <p>Manston Airport was designated in the 2006 local plan as an airport. It must remain so. RiverOak's indemnity proposal appears not to have been taken seriously by senior Officers or some Cabinet Members at TDC despite assurances that costs would be underwritten by RiverOak. RiverOak have been more than patient and anyone who was not serious in their intent would have given up by now. I declare my support for Manston remaining as an airport. The land must be retained for aviation use only. Future developments should be airport related activities and not given over to mixed use/housing. There should be no re-naming or re-zoning of the area as a general opportunities site, or anything else that could jeopardise the future of the airport as an aviation site. The DCO will determine the outcome.</p> <p>In addition, the airport's historical significance must be remembered; this warrants the airport's continuation as a working memorial. The Spitfire & Hurricane museum are proof of the continued public interest in Manston and its history. TDC must consider Manston Airport in their tourism plans.</p> <p>Part of the well-publicised plans from RiverOak include employment forecasts : "Manston Airport in 10 years' time : · 1,300 direct jobs plus at least 1,000 indirect jobs · 120,000 tonnes of cargo a year with an emphasis on perishables · Packing, storage and distribution of perishables · 100 aircraft a year recycled in facilities developed jointly with a major aircraft manufacturer · 50 aircraft a year repaired/maintained · Growing business jet traffic · Light aircraft training · A resident airline carrying 1.5 million passengers a year to leisure destinations A significant number of the above jobs would be for trained personnel such as engineers, air traffic controllers and fire fighters. These would be new jobs, with a substantial training requirement.</p> <p>The local plan mentions the provision of 5,000 new jobs – I sincerely hope TDC have not based this on the mis-quoted Chris Musgrave's (one of the current joint venture "owners" of Manston) videoed speech. In this, he hopes Wynyard Park will eventually have 4,000 jobs (current figures after 10 years, 1200, mostly not new jobs but re-located businesses) – this was very cleverly mis-quoted by the media as 4000 jobs for Manston if it becomes a mixed use development. He did NOT say 4000 jobs at Manston but implied this was at Wynyard.</p> <p>So where are these 5000 jobs going to come from? Certainly not from tourism if the island becomes one big urban sprawl. Thanet's current business parks are not at full capacity and some of the land they occupy would more than satisfy the need for future commercial development without Manston being taken into the equation.</p> <p>To conclude, I have left out many of the points raised in the local plan, not because I agree with them, but because my main personal concerns are that the proposed use of agricultural land in Birchington should be taken out of the plan, I am questioning the need for 17,200 houses overall, I am disputing the number of jobs forecast, and I advocate Manston Airport remaining as a functioning airport with only aviation related activities.</p>		1373		Email

					<p>Other documents used in the writing of my objections:</p> <p>https://www.gov.uk/government/policies/giving-communities-more-power-in-planning-local-development/supporting-pages/local-plans</p> <p>http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf</p> <p>http://www.guildford.gov.uk/media/15420/Local-Plan-Issues-and-Options-document/pdf/Guildford_borough_Local_Plan_Strategy_and_Sites_Issues_and_Options.pdf (what a shame TDC did not produce such a worth document!)</p> <p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5959/1896534.pdf</p> <p>https://excel.office.live.com/x/ExcelView.aspx?FBsrc=https%3A%2F%2Fwww.facebook.com%2Fattachments%2Ffile_preview.php%3Fid%3D647776915348424%26time%3D1425678079%26metadata&access_token=100001906038614%3AAVI7q2PpQZw2J70YinGV7HCbDd95VZml8avXRsgEl4h8g&title=Country+of+birth+tables+2008+to+2012.xlsx</p> <p>This document shows how immigration is affecting the population of the UK – in Thanet we have had an upsurge of immigration in recent years. This is affecting the availability of jobs, and the availability of housing. It is my contention that immigration, which was unfettered during the last Labour administration, and which the coalition government have done little to contain, is having a direct impact on Thanet and the drafting of this local plan. Why should the settled local population have to put up with the consequences of failed government policies? If this link does not open see attached document.</p> <p>http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.gos.gov.uk/gose/planning/regionalplanning/815640/</p>				
Field		178	Dane Valley Woods	Support	<p>This is a very fair assessment of the situation, and allows for relatively rapid inclusion in to the local infrastructure plan if DCO is not granted. Manston Airport may prove a better site for new housing and business infrastructure than others in the local plan, so this should be kept in mind, as any reduction in open spaces should be kept to an absolute minimum when a viable alternative may be imminently available.</p>		506		Web
Franklin	Dennis	33		Object	<p>Below is my submission, and objection against Manston airport being re-opened, which I wish to be noted in respect to the plan. I am particularly concerned that my PDF's are taken into consideration, as they indicate the likely area of Ramsgate that will be devastated should cargo/aircraft ever fly in over Ramsgate Harbour, Ramsgate Town, St Lawrence, and the Nethercourt Estate!</p> <p>"An aircraft covers three miles every minute (when approaching to land) and descends about 300ft (1 00 meters) a mile". Not my words but those of Andy Dolan, an air traffic controller at Heathrow, and he should know, it was published in the newspaper Saturday 22nd July 2017!</p> <p>Aircraft must descend over the Royal Victoria Pavillion in Ramsgate Harbour, at a height of only 300 meters, at an angle of 3 degrees to land at Manston, so will by necessity fly at just 100 meters height over Nethercourt, three miles away! You are urged to click on the PDF's to see how bad Ramsgate/Thanet will be devastated by low flying aircraft should they ever be permitted to use Manston airport.</p> <p>It has been proposed that an American Hedge Fund company with no airport experience, is behind a company called RiverOak Strategic Partners (RSP), who want to re-open Manston airport as a huge cargo hub. If successful their published proposal is to fly in at least 47 possibly more flights, of noisy, polluting, low flying cargo planes over Ramsgate, Herne Bay,</p>		68	<p>002-Franklin-LP-Blighted area.pdf (1.3 MB)</p> <p>002-Franklin-Flight line over Ramsgate.pdf (2.2 MB)</p> <p>002-Franklin-Flight Approach Glide over Ramsgate.pdf (284 KB)</p>	Email

					<p>and nearby villages every 24 hours! No regular passenger flights are planned, and RSP admit that there will be continual night flights! At East Midlands, the UK's most successful cargo airport, more than half the cargo flights are night flights. The same here would mean 25 cargo flights a night on average over our heads, goodbye to a good nights sleep!</p> <p>KEY FACTS: 1) People close to an airport have more life threatening/health problems due to noise, and air pollution causing stress due to sleep loss, and respiratory conditions. This cargo airport plan, and the proposal to re-open Manston as an airport using a Development Consent Order, is a serious threat to the health and well being of everyone under the flight paths (Click on the PDF's below to see who live, and work under the flight path!). No meaningful noise and air pollution maps have been prepared to show how large an area under the flight paths would be affected by low flying aircraft by RSP! 2) There will be 47 probably more, low flying cargo planes every 24 hours 2 or 3 an hour, which will disrupt our schools, businesses, cafe's, hotels, restaurants, and seriously damage the tourist industry, especially over the Ramsgate Harbour/town area, where aircraft will approach at a height of 300 meters above the Royal Victoria Pavilion! Low flying aircraft will also lower the value of property and make it difficult to sell. I am one of the few people who have direct experience of low flying cargo aircraft over Ramsgate Harbour! For 2 years I stood outside the Wilko store in York Street, every Saturday morning, collecting for an animal charity. This was during the period when the airport was only used to train pilots in landing and take off, in Cargo aircraft. When these aircraft flew over the Harbour at 300 meters, to 250 meters high, their horrific noise drowned out all conversation, as they roared up Ramsgate High Street, terrifying the tourists, and population alike!</p> <p>3) Should the airport re-open for cargo flights, as proposed by RSP, there will be thousands, and thousands more HGV freight lorries on our roads, to transport cargo from Manston. 4) This is not a choice between a massive airport, or a housing estate, Manston's current owners are allocating just a third of the site for housing. A third will be open, public, green spaces for sports and recreation, and a third for new Hi and Lo tech businesses, creating thousands of jobs. There will also be vital support infrastructure like new schools, and health clinics. 5) Thanet must find space for 17,000 new homes by 2031, by law. If some of them are not built at Manston , they will be built on 'green field' sites! At this present moment hundreds of angry</p>				
--	--	--	--	--	--	--	--	--	--

					<p>residents in Westgate, and Garlinge are planning to march and demonstrate against the TDC proposal to allocate some 800 new houses there! The green wedge between Thanet coastal towns could disappear. 6) The plan is not to bring back the little airport we had before. The aim is to make Manston the biggest cargo airport flying 24/7, and in the process wrecking Thanet as a holiday resort, and somewhere attractive to live!</p> <p>Click on the pdfs below to see that low flying jet cargo aircraft will have to fly in at only 300 meters high over Ramsgate Harbour, descending to 250 to 200 meters over Ramsgate/town, 150 meters over StLawrence, and just 100 meters high over Nethercourt, before touchdown!</p> <p>If you can hear a jet aircraft 5 miles high, think what it would sound like at under 300 meters!</p> <p>One of the pdfs will show the area under the flight path in Rams gate, based on an area 3 km by 4.6km, which it is reasonable to assume will suffer the most: even people living at the periphery less than a mile from the centre line of the flight path will suffer to a greater or lessor extent, and most likely be woken by aircraft flying in at less than 100 meters high! But all of the people of Thanet will suffer from air, and noise pollution, and its goodbye to a good nights sleep for most.</p> <p>IN CONCLUSION: I have no remit for the present owners of Manston airport, and have no financial interest in their businesses, and have never met or communicated with them. However, it has to be remembered they initially bought into the airport as partners with the last owners who had failed, despite their previous experience in aviation, to make Manston profitable. In fact Manston had had at least 4 previous air carriers, all of which failed for one simple reason, lack of demand! There just isn't sufficient demand to sustain an air carrier from Manston, and it can only be conjectured why RiverOak's Development Consent Order application included that they "aspire" to attracting a passenger service", when no sensible air carrier will be interested! It is a moot point that this application cannot be in the National Interest, when there are at least 5 or 6 existing airports, better located North of London, with spare cargo capacity!</p> <p>In the meantime the present owners plans to develop the airport for thousands of desperately needed low cost, and social housing, is being stymied, as will be their wish to develop the site for Lo and Hi Tech industry, park, and recreational amenities, schools, and medical centres! If Manston was developed this way, it would benefit Thanet immensely, by creating wealth, and be a welcome addition to attract young, skilled workers to Thanet, which at present has</p>				
--	--	--	--	--	--	--	--	--	--

					<p>nearly full employment, and only a low skilled workforce!</p> <p>So why does Thanet Council wish to refuse to allow the owners to develop Manston for the benefit of thousands, especially young skilled workers, and instead devastate Ramsgate, and surrounding areas with noisy, air polluting low flying aircraft, day and night? I believe there are ulterior motives, and its for the present council, and others, who are playing the re-open Manston airport card for political advantage! In any other town in the UK the idea of having an airport less than 2 miles from a heavily built up town, would be fought tooth and nail to prevent it happening!</p> <p>I move in eclectic circles, and know of many young and old people of various background locally, who have no idea what devastation would occur to Ramsgate, and Thanet should Manston re-open as an airport, as proposed by RSP! Instead they think they would get a cheap foreign holiday out of it, but that never happened before, because the previous attempts had very limited destinations, and few aircraft! No, there can be only one reason why some local politicians are preventing the development of Manston by the present owners, and that is because they believe by promoting the re-opening of Manston for aviation use, it will prove popular, and win them votes. In affect they are deceiving the electorate, by exploiting their ignorance for their own base reasons! They are promising more jobs, but where will the workforce come from, as Thanet already has near full employment, so they will have to come from elsewhere, and they will not be skilled jobs! And where will these new people live? Thanet already has a housing crisis, and there is a rented accommodation shortage! Neither of the two Thanet MP's live in Thanet, and so would not suffer the ill affects of air, and noise pollution, the destruction of jobs in the Tourist industry, especially in the hospitality trades and Ramsgate Harbour, the severe devaluing of their property as low flying aircraft fly in 2 or more an hour, day and night, as is proposed by RiverOak! As I mentioned ulterior motives earlier, it has to be remembered the MP for South Thanet, Craig Mackinlay, was recently admonished by the House of Commons for not disclosing he has a vested interest in the reopening of Manston, because he owns an aviation company!</p> <p>Few local politicians in control of the Council, or those who voted for Manston to be for aviation use only in the Local Plan, will lose any sleep as thousands of Thanet people, on the balance of probability will, which will also affect their health, their employment, and school work! It is on this basis I am strongly opposed to the Local Plan to include Manston for aviation use, and I hope any chance of this happening will fail, because should it happen it will be a disaster for the people of Thanet, especially those who live, work and go to school here. Finally, I urge anyone</p>				
--	--	--	--	--	--	--	--	--	--

						who is interested in this matter to click on the PDF's below, to see how low flying aircraft will affect the people of Ramsgate in particular, and Thanet in general, to their severe detriment.				
Frencken	H	172			Object	<p>Every report commissioned by Thanet District Council has concluded that an airport is not economically viable not deliverable (Falcon, Avia, York) The only report that claims the site is viable as an airport is Azimuth (which has been discredited by York Aviation after misquoting the latter).</p> <p>Previous TDC administrations (Labour and Ukip) sought unsuccessfully CPO partners to help reopen the airport. The only company to come forward (RSP) could not supply adequate proof of funds.</p> <p>Councillors consequently voted against officer advice and insisted that a the site remains earmarked for aviation use.</p> <p>As a consequence, this means that the mixed development proposed by the present owners of the site which consists amongst others several thousand housing units, green fields will not be built upon to accommodate Thanets' housing need.</p>	That the clause designating the site for aviation use only is removed and replaced with a mixed use designation.	492		Web
Giddins	Rod	62			Support	I welcome the statement in paragraphs 1.38 to 1.45 in the Plan. The reopening of the airport as a cargo hub has the potential to create meaningful jobs for local people and help to regenerate the economy by increasing spending in the area. The Plan provides a pragmatic approach to this issue.		175		Email
Goodban	Rex	236	R A Goodban & Son		Support	TRhe planning appeal in March 2017 demonstrated that the report referred to in the third paragraph (Avia Report) could not be relied upon. Full support should be given to the re-establishment of the site for aviation use in the national interest and for employment locally.	Cease reliance on the Avia Report	721		Web
Green	Jeremy	287	Creative Circle Foundation		Object	Please don't open Manston as a cargo hub. This will be so detrimental to this amazing community. Thanet benefits in some of the freshest air in Britain with the sea on three sides. A cargo hub will not only disturb the peace with noise but will also polite the area and deter investment in the area. Please do not do this. Jeremy	Reverse the idea completely. There is no good reason to open the cargo hub. It won't increase jobs in the area as it will require specialist staff that will need to be brought in and it will destroy the attractiveness of Thanet as a holiday destination and a place to live.	837		Web
Green	David	470	Mr		Object	<p>I have carefully considered the evidence for the re-opening of the former Manston Airport for commercial aviation as well as the alternative proposal by the site owners SHP for mixed use housing and employment uses.</p> <p>I oppose the reopening of the disused airport as an international 24/7 cargo hub because of the serious adverse health, educational, economic and environmental impacts this would have on the area and the opportunity that would be lost for the site to make a substantial contribution to the long-term housing and economic needs of the district.</p> <p>Having critically appraised the application by RiverOak Strategic Partners (RSP) for a Development Consent Order (DCO), I would draw Local Plan assessors to the folloing: Qualifications and experience of the applicant. RSP have no experience of running a freight hub of the scale proposed. The history of the individuals involved in the bid shows inconsistency in twice responding to a search for a CPO partner by Thanet District Council as Riveroak Inc. a USA finance company, for an entirely different business model. It would seem their motivation is to acquire the site rather than create a freight hub.</p> <p>Financial credibility of the applicant. RSP have repeated failed to declare the source of their finances. This was one reason for the collapse of the two CPO bids. PINS have indicated that this needs to be addressed early in the examination.</p> <p>Due diligence on the applicant. Granting a DCO to a company based off shore with no</p>		1334		Web

					<p>track record, to the detriment of a British company with a good track record in redevelopment would be unprecedented. I would ask PINS if there is any precedent. Fundamental flaws in the proposal and the methodology underpinning the business plan. RSP has provided no detailed long term business plan, just a list of aspirations. Repeated Independent , professional reports question whether RSP's speculative plans are viable.</p> <table><tr><th>Name of report</th><th>Commissioned by</th><th>Date of report</th><th>Verdict</th></tr><tr><td>Davies Commission</td><td>HM Gov</td><td>Various 2013 onwards</td><td>Manston too small to be a feeder hub</td></tr><tr><td>Falcon</td><td>TDC</td><td>July 2014</td><td>Not viable</td></tr><tr><td>KCC</td><td>KCC</td><td>March 2015</td><td>Not viable</td></tr><tr><td>Price Waterhouse</td><td>TDC</td><td>22 June 2015</td><td>Insufficient resources for CPO</td></tr><tr><td>Avia</td><td>TDC</td><td>September 2016</td><td>Not viable</td></tr><tr><td>Avia final</td><td>TDC</td><td>August 2017</td><td>Not viable</td></tr><tr><td>York Aviation</td><td>SHP</td><td>September 2017</td><td>Sally Dixon's work was flawed</td></tr><tr><td>Critique of Azimuth</td><td>NNF</td><td>February 2018</td><td>Sally Dixon's work was fatally flawed</td></tr><tr><td>Altitude Aviation</td><td>SHP</td><td>March 2018</td><td>Not Viable and Sally Dixon's work is flawed</td></tr></table> <p>5. Flawed assessment of the UK's freight market. RSP have provided little evidence of demand from existing logistics companies. RSP have provided little evidence of how they will compete with existing freight hubs at Heathrow, Gatwick, Stansted or East Midlands. Does Manston have a 24 hour operation like EMA? NO because they say they don't need Night Flights Does Manston have a central UK location with fast motorway access to all parts of the UK? Er No it's stuck in NE Kent with an hour to get to the M25. Does it have frequent flights to other UK airfields to avoid the road network? Well no and it has never been suggested Can it build an extensive network of Freight forwarding companies? Doubtful In fact most cargo travels in the belly of passenger planes and would prefer their planes not returning empty something that didn't happen at Manston.</p> <p>6. Case for “of National Significance”. Claims that any operation of this type located in the extreme south east of the country could be of national significance are unrealistic. Manston has never been more than a minor regional airport, and has now been closed for four years with no appreciable loss, nationally, regionally or locally.</p> <p>7. Viable and credible alternatives. RSP have not provided evidence that they have seriously examined other possible locations. Both Mildenhall and Lakenheath are looking for buyers and have far better motorway connections without a town of 40,000 inhabitants at the end of the runway.</p> <p>8. Manston's past failures. Manston has failed as a commercial airport under 3 different owners. Each tried to develop it as a Cargo hub. Between 1999 and 2014 the airport accounted for no more than 2% of U's air freight. It closed in 2014 having losses of around £100m during its 15 year commercial life. A number of independent studies have concluded that without massive government support any operation will fail. The government's study of future airport capacity in the south of England dismissed Manston.</p> <p>9. Geography. Almost any other location than a remote coastal peninsular would provide better logistics than RSP's proposal. The location's distance from any possible freight market means the operation would be particularly environmentally unfriendly.</p> <p>10. Lack of proper consideration in the proposal regarding impact on traffic and road network. RSP have shown little concern regarding the overall impact of the heavy goods and vehicles along the Thanet way, the single road access. RSP show no plans for a fuel pipeline servicing the freight hub which means the Avgas will have to be transported down the Thanet way and stored somewhere. Much of this route is just dual carriageway</p>	Name of report	Commissioned by	Date of report	Verdict	Davies Commission	HM Gov	Various 2013 onwards	Manston too small to be a feeder hub	Falcon	TDC	July 2014	Not viable	KCC	KCC	March 2015	Not viable	Price Waterhouse	TDC	22 June 2015	Insufficient resources for CPO	Avia	TDC	September 2016	Not viable	Avia final	TDC	August 2017	Not viable	York Aviation	SHP	September 2017	Sally Dixon's work was flawed	Critique of Azimuth	NNF	February 2018	Sally Dixon's work was fatally flawed	Altitude Aviation	SHP	March 2018	Not Viable and Sally Dixon's work is flawed				
Name of report	Commissioned by	Date of report	Verdict																																														
Davies Commission	HM Gov	Various 2013 onwards	Manston too small to be a feeder hub																																														
Falcon	TDC	July 2014	Not viable																																														
KCC	KCC	March 2015	Not viable																																														
Price Waterhouse	TDC	22 June 2015	Insufficient resources for CPO																																														
Avia	TDC	September 2016	Not viable																																														
Avia final	TDC	August 2017	Not viable																																														
York Aviation	SHP	September 2017	Sally Dixon's work was flawed																																														
Critique of Azimuth	NNF	February 2018	Sally Dixon's work was fatally flawed																																														
Altitude Aviation	SHP	March 2018	Not Viable and Sally Dixon's work is flawed																																														

					<p>and already heavily used.</p> <p>11. Underestimation of impact on local economy. The impact on Ramsgate will be severe as Ramsgate is increasing reliant on its vibrant tourist trade economically. Ramsgate has the largest conservation area of Regency and Victorian houses in the country particularly difficult to insulate and susceptible to vibration.</p> <p>The Council has chosen to disregard this independent expert advice and not allocate the airport site for any specific purpose in the draft Local Plan as they wish to allow the DCO application by RSP to be examined. This decision is not based on evidence and continues to prevent the speedy use of the site for regeneration purposes outlined by the owners. The council appears instead to be preparing its Local Plan with regard to an application from RSP that relies solely on a business case put together by Azimuth who have been heavily criticised by Avia Solutions, York Aviation and Altitude Aviation Advisory. We consider that the burden of evidence in front of the council is such that the Manston site should be designated for mixed use development.</p> <p>We strongly support the designation of the site for mixed housing and employment uses especially having regard for the scale of new house building needed to meet the assessed need and the need to provide a wide range of employment uses within the District for the Plan period and beyond.</p> <p>The disused Manston Airport site is the largest Brownfield Site in the District.</p> <p>Chapter 11 of the National Planning Policy Framework (NPPF) July 2018 (Making Effective use of Land) requires local planning authorities to give priority to previously developed (brownfield) sites when making provision for assessed housing needs.</p> <p>Para117 of the NPPF states that:</p> <p>“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or brownfield land.”</p> <p>By failing to designate this site for mixed use development housing and employment uses TDC have failed to comply with the requirements of the NPPF relating to the tests of “soundness” set out in Paragraph 35 Examining Plans. This states that Plans are “sound” only if they are:</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.</p> <p>For these reasons we oppose the designation of this area for aviation uses and strongly support the development of the site for residential and business uses.</p>				
Gregory	Amelia	316	Thanet Trees https://www.facebook.com/groups/2	Observation	<p>Mansion Airport</p> <p>https://consult.thanet.gov.uk/consult.ti/TLP_PRE_SUB/viewCompoundDoc?docid=9428628&sessionId=&voteid=&partId=9429364</p> <p>Thanet Trees suggests that the Manston airport area could be best used as a woodland park: a combination of country park (such as Betteshanger Park) and a holiday park site, such as Center Parcs model. By doing this there would be no need for further argument as</p>		961		Email

			13882456 9723508/			to whether the site is suitable for aviation or housing. It would generate income as a holiday and day trip destination, with all the infrastructure that entails (cafe facilities, parking costs, events, holidays) without causing as many problems with locals who object to increased traffic, increased population or increased noise pollution. We have barely any wild spaces left in Thanet, as the area is mostly given over to urban development and farming. A new woodland park could help to foster wildlife before it disappears from our countryside. This eco-park in Sheffield provides another inspiration https://www.sheffield.ac.uk/about/city/news/love-square-landscape-research-city-eco-park-1.592587 https://www.theguardian.com/commentisfree/2018/mar/26/wildlife-modern-farming-insects-birds?CMP=share_btn_fb				
Hall	John	174			Object	Since the council has commissioned reports on the viability of the airport which found it is not at all viable I object to the local plan choosing not to allow the building of houses on the Manston brownfield site and instead forcing houses to be built on agricultural land.	Cancel the 2500 House building on the greenfield areas and reinstate the original option for houses on the former airport site.	494		Web
hammock	susan	34			Object	I am totally against the reinstatement of Manston Airport. The money that has been wasted by Thanet District Council and in the past Kent County Council on this subject is unacceptable. I live in a village on the flight path and I am not looking forward to night flights (which no matter what Riveroak say will take place) noise pollution, and air pollution. Our village has also been blighted by new houses, most of them unaffordable to local people. With no infrastructure for schools doctors etc, and on good agricultural land. How can Thanet District Council justify its ongoing two in a bed relationship with Riveroak when the report done by Avia Solutions that they commissioned was totally against any hope of the site ever being a viable airport. As local residents against the airport we have had no representation on the council or in parliament as all politicians etc have jumped on the bandwagon that is Riveroak. We need houses that people can afford, schools that are local to where the children live, doctors that you can get an appointment with, and the proposed development of Manston by Stonehill Park Ltd would have answered these problems. As the council admit tourism is one of our main employers, with our lovely coastline, but who wants to sit on a beach with aircraft coming in low all day long. I do wish that Thanet Council and our MPs would take a long hard think about Manston and think of the future not the past, and what their and my grandchildren will think of their decision in the future.	I would like to see the Avia Solutions report taken seriously and not discounted by the council. Why pay for it to be done and then disregard it More of our council tax wasted.	70		Web
Harris	Elaine	120			Object	This final statement regarding Manston, 'In the event that a DCO or CPO process is not accepted or granted, or does not proceed, the Council will need to consider the best use for this site, in the next Local Plan review after a minimum of two years.'is of great concern to me. By adding minimum this can go on for years with nothing ever being resolved, if the DCO is rejected by PINS that would mean it can just keep being resubmitted by RSP as they please with no shut off point and in the meantime the continuous cost to Thanet is beyond ridiculous. Because of this latest version of the DLP it means that whatever future new houses are foisted upon Thanet, now and in the future will now be placed on Greenfields. If the minimum is two years what is the maximum....infinitem ? The DCO should never have had any affect on the Local Plan as it has only just been accepted by the Planning Inspectorate for pre-examination with many questions regarding it's factual evidence, funding, night flights etc.etc.	If this Plan is to go ahead it should be two years only not minimum and the DCO should not come into the Local Plan whatsoever.	254		Web

Hayes	Philip	218			Object	As one of the best possible assets for the future of prosperity to Thanet, producing revenue and employment on a permanent basis, Manston Airport should be maintained as such and thus removed from the TDC Brown Field register of land. No other site in Thanet has the propensity to produce income and jobs on the scale that Manston Airport can, but ONLY AS AN AIRPORT. Policies EC4 and SP05 (or their equivalent) should be retained.	Take Manston Airport out of the risk of being redeveloped unnecessarily, and retain as major revenue producing asset that it is and can in the future.	665		Web
Hetherington	Jane	184			Object	For many years the spectre of the airport has hovered over Thanet and been a constant source of concern and worry to residents of Herne Bay and Ramsgate. Although The Asia report comprehensively dismantled the idea that such a reconstituted airport would be viable we are once again in the position of having an airport being rising from the ashes of the hopes of airport supporters who must be the only group in the country actively campaigning to destroy the area in which they live. I wish to see Thanet use the site for building the development that SHP have promoted in their plans. I do not wish to see the additional housing this area is required to have on greenfield sites or in the villages. Manston airport is there and the best use for the site is a mixed development providing housing and much needed jobs.	The airport site should be redesignated as was originally intended but barred by a vote at TDC due to self interested airport supporting councillors with no interest in what would promote and regenerate Thanet. A nonsensical decision which does not relate to the airports long history of failure. Redesignate the area for mixed use development.	535		Web
Hilton	Adrian	208			Object	I firmly believe that Manston Airport should not be included in the Brownfield Register. It has been and still is an Airport. Until such time that it proves to be impossible for it to be used for its original purpose (Aviation) it should remain protected by policies EC4 and SP05. These policies should remain operative and not be replaced by relatively meaningless words.	I firmly believe that Manston Airport should not be included in the Brownfield Register. It has been and still is an Airport. Until such time that it proves to be impossible for it to be used for its original purpose (Aviation) it should remain protected by policies EC4 and SP05. These policies should remain operative and not be replaced by relatively meaningless words.	636		Web
Hodder		18			Object	As a local resident I feel the fact the LP retains Manston Airfield for aviation only is wholly irresponsible and incredibly detrimental to the area as a whole. By doing this does not of course negate the need for major housing developments, but it does mean that any new developments will be generally unsuitable locations and on many pockets of land which will only have space for housing and no additional infrastructure. For example, take the existing Westwood Cross housing development. This includes just housing and bar a restaurant and one retail unit, there is no other improvement to the infrastructure, so these houses are putting additional strain on the local hospital, schools etc. To add to this purely to retain the airport is ludicrous. additionally, the Avia report clearly states that Manston is not viable for aviation operations, and this is of course compatible with previous history. The concerning thing with this is I have had conversations (via social media) with local cllrs (both TDC and KCC) who have separately told me that the council do not agree with the report purely because it is against their views and would happily commission another report to ensure a new one would be produced which gave the "right outcome". I am also advised that the Council wish to have reference to the Avia report removed from the Local Plan as they believe the information is not relevant or required. What would the situation be if both the Local Plan and the DCO are approved? There will be mass housing all over the Island but then if the airfield operation fails as is quite likely, would the land still be developed for even more housing? I sincerely believe the alternative plan offered for Manston would bring quality, needed housing increased leisure options and also quality employment. Hopefully all views will be fairly and openly considered.		29		Web
Hogben	G	359	Save		Observation	Manston Airport should be re-opened after being re-furbished as it has the longest		1054		Web

			Manston Airport			<p>runway, is very near the sea and the continent, and has great historical usage by the RAF in WWII. We cannot wait to see the aeroplanes back flying from Manston.</p> <p>We need the airport in the south east to take the freight off the roads which are already under pressure. Very many Thanet people miss the airport, Gatwick does not want another runway, neither does Heathrow, we have the facility to alleviate these airports of congestion. Thanet has always needed more jobs - this airport will create many jobs for the future.</p> <p>Please allow River Oak to re-open our airport.</p>				
Holbrook	Lynne	195			Support	<p>Please support the reopening of Manston Airport</p> <p>Please keep Manston as an airport. Policies EC4 and SP05 (or equivalent) should be retained. I would also request that Manston airport should be removed from the Thanet District Council Brownfield Register. Thanet needs a thriving airport and all the benefits it will offer to a currently socially deprived area. If it is reopened with passenger flights, my family will continue to fly from Manston as we did previously.</p>		559		Web
Hollins	Andrew	301			Object	<p>After many years of failure and closure of the airport this brownfield site should be considered for housing instead of the greenfield sites proposed. Manston airport is not viable and never will be.</p>		875		Web
Holton	Susan	139			Object	<p>All the time the Council keep stalling on making a decision to allow Stone Hill Parks planning application the area is blighted. Work with them to get this underway and get the best deal - infrastructure, schools, surgerys etc for Thanet. Even if the DCO is granted work is unlikely to commenced by then so it would speed up the process rather than leaving things in limbo even longer. At this rate it will turn into another Pleasurama - derelict for years to the detriment of Thanet.</p>		346		Web
Johnson	Elisabeth	51	Monkton Residents Association		Support	<p>Rather than housing if Manston does not return to being an airport a far better use for it would be as a country park on the lines of the one near Deal.</p>		123		Web
Jones-Hall	Jason	228			Object	<p>I strongly object to the Council's decision to continue to prolong this issue and delay any progress or viable development of the Manston site by "proposing not to allocate the Airport site for any specific purpose in the draft Local Plan". This decision runs counter to advice from TDC officers' own recommendations, TDC's Avia Report, which found the airport plan to be not viable, original TDC decisions with regards to mixed-use development, which was overturned in early 2018, Strategic Priorities 1-5 identified in this draft local plan and NPPF guidelines for sustainable development with regards to "an economic role, a social role and an environmental role".</p> <p>As such, I strongly believe TDC has been both irresponsible and negligent in its duties in refusing to allocate a specific purpose for the Manston site with regards to housing requirements and mixed-use development. Further, this decision is not as simple as ensuring the DCO is not prejudiced or that TDC is "proposing not to allocate" just this land, since non-allocation of this brown-field land for the housing requirements as set out in the rest of this Local Plan has a profound effect on where such housing has been allocated in its stead, particularly with regards to alternative green-field sites.</p> <p>Specifically, I believe the council has been negligent in its duties with regards to the RSP proposal and its impact on opportunity cost for more viable development on the following grounds:</p> <p>1) Previous experience has already demonstrated on multiple occasions that use of the site for commercial airport operations is not viable. Its long history of failure includes:</p> <p>closure of Inter-European Airways in 1992-93;</p> <p>collapse of Cypriana Holidays in the early 1990's;</p> <p>collapse of EUJet and Planestation in 2005;</p> <p>withdrawal of commercial services prior to commencement by Cosmos/Monarch in 2006</p>	<p>Remove the reservation of the Manston site and allocation for Aviation use with immediate effect.</p> <p>Unblock use of the Manston site for mixed development and re-allocate housing requirements of the Local Plan, taking availability of the Manston site into consideration, with immediate effect.</p>	713		Web

					<p>due to lack of bookings; collapse of Futura Airlines and Segura Travel in 2008; withdrawal of FlyBe in 2011/2; disposal of the loss-making airport by Infratil in 2012/13; and the ultimate closure of the airport in 2014.</p> <p>2) The lack of viability of the airport has previously also been confirmed in the 1993 Department of Trade and Industry Report, confirming it was not suitable for development as a major airport due to close proximity to the town, and as recently as 2017/18 in Avia's independent report, commissioned by TDC themselves, which also "concluded that airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the period to 2031".</p> <p>3) There appears to be a lack of basic due diligence with regards to the RiverOak Strategic Partners proposal, specifically:</p> <p>Neither RSP nor its parent companies have any track record in owning or operating an airport or any other Nationally Significant Infrastructure Project (NSIP)</p> <p>The split from RiverOak Corporation - the original applicants - means RSP is essentially a start-up business with no major corporate backers, limited assets and finance, no registered Persons with Significant Control and a corporate structure that lacks transparency</p> <p>Principal RSP Directors have no track record in this sector, with the exception of Tony Freudmann, and no experience in a NSIP</p> <p>Tony Freudmann's own track record is one of failure, serial insolvency and being struck off the Solicitors' Roll for 27 counts of misappropriation of client's funds</p> <p>Helix Fiduciary - the only funder for which RSP has provided any evidence of support - has no track record of investing in airports or any other NSIP or of raising the levels of finance required to do so</p> <p>The only evidence of even the most basic levels of finance available to RSP complete the DCO process, (£15m), is from Helix Fiduciary and signed by Helix Directors Rico Seitz and Nicholas Rothwell, both also directors of RiverOak Strategic Partners. This represents a conflict of interest that should be of great concern to TDC, PINs and to any investor or prospective investor working with Helix Fiduciary</p> <p>Dr Sally Dixon, author of the "Azimuth" report which forms the foundation of RSP's proposal and business case, continues to illegally and fraudulently present herself as "Azimuth Associates Ltd" on her own website. In fact, she has no connection with this company - a mobile foot clinic in Cheltenham</p> <p>Dr Sally Dixon is an independent researcher with no significant experience in aviation research, the economics of airport operations or formal training or experience in economics, having achieved her PhD in 2014, shortly before the start of this process. The only evidence of any research experience in this field is her PhD thesis on the master planning process for airport managers. This is a completely different field of research, requiring a different understanding and skill-set, than is needed to develop a business case for a NSIP</p> <p>The economic case for RSP's proposals has not been made and is not supported by any independent third party reports. Further, it is notable that general employment in Thanet has risen by 13.8% since the closure of Manston Airport in 2014, (source: Nomis) and tourism-related employment in the region has risen by 23% since the closure of Manston (source: VisitKent Destination Research) as direct result of the positive measures TDC has taken to support and develop Thanet's heritage, arts/culture and active lifestyle related tourism industry. It is my strong belief that continuing to develop such initiatives - a proven success - will continue to yield positive results. The risk of sacrificing this - or indeed reversing it - by prolonging the uncertainty surrounding the Manston site - or,</p>				
--	--	--	--	--	---	--	--	--	--

					<p>worse still by approving the airport development - is a risk not worth taking, given the proven failure rate of previous airport operations and question marks surrounding RSP, their proposal and their questionable ability to deliver a project of this scale. Thanet has already suffered from many embarrassing and costly impacts of bad decisions, often born from a similar lack of anything approaching a rigorous approach to due diligence with regards to both Ramsgate Port and the Pleasurama site. We can ill-afford another costly failure and resulting fiasco based on making the same mistakes with regards to due diligence.</p> <p>4) RSP has made it clear in its proposal for use of the Manston site as a 24/7 cargo freight hub that "significant adverse effects have been identified as being likely as a result of an increase in noise" in Ramsgate, Manston, Wade, West Stourmouth and Pegwell Bay. The RSP proposal goes on to say "aircraft noise would increase to a point where there would be a perceived change in the quality of life for occupants of buildings in these communities".</p> <p>5) This admission - and the reality of low-flying, heavy cargo aircraft over Ramsgate harbour - makes it impossible to see how the RSP proposals are consistent with the Local Plan with regards to housing, green infrastructure network, biodiversity, tourism development, plans for Ramsgate and other significant issues as identified later in my comments under the relevant sections.</p> <p>6) Specifically, the reversal of TDC's original decision and failure to allocate this site for alternative mixed use development runs counter to housing requirements and vision for Ramsgate 'to maximise its maritime heritage, Royal Harbour, marina, beach and attractive waterfront, and provide economic base of its vibrant mix of town centre uses, visitor economy and café culture". (Sections 2.34 - 2.44). It is impossible to reconcile this vision for Ramsgate with the reality of low-flying cargo aircraft over the town and Royal Harbour on a 24/7 basis.</p>				
Jones-Hall	Samar a	295			<p>Object</p> <p>I strongly object to the Council's decision to continue to prolong this issue and delay any progress or viable development of the Manston site by "proposing not to allocate the Airport site for any specific purpose in the draft Local Plan". This decision runs counter to advice from TDC officers' own recommendations, TDC's Avia Report, which found the airport plan to be not viable, original TDC decisions with regards to mixed-use development, which was overturned in early 2018, Strategic Priorities 1-5 identified in this draft local plan and NPPF guidelines for sustainable development with regards to "an economic role, a social role and an environmental role".</p> <p>As such, I strongly believe TDC has been both irresponsible and negligent in its duties in refusing to allocate a specific purpose for the Manston site with regards to housing requirements and mixed-use development. Further, this decision is not as simple as ensuring the DCO is not prejudiced or that TDC is "proposing not to allocate" just this land, since non-allocation of this brown-field land for the housing requirements as set out in the rest of this Local Plan has a profound effect on where such housing has been allocated in its stead, particularly with regards to alternative green-field sites.</p> <p>Further, I strongly believe TDC has been both irresponsible and negligent in its duties in refusing to allocate a specific purpose for the Manston site with regards to the significant and severe impact it will have upon Ramsgate and Thanet's ability to achieve any of Local Plan policies including but not limited to SP02, SP09, SP12, SP21, SP23, SP34, SP36, E10, E05</p> <p>Specifically, I believe the council has been negligent in its duties with regards to the RSP proposal and its impact on opportunity cost for more viable development on the following grounds:</p> <p>1. RSP are a start up company. The split from RiverOak Corporation - the original applicants - means RSP is essentially a start-up business with no major corporate backers,</p>	<p>The Local Plan must support the mixed-use development of the former Manston airport site and allocate a specific purpose for the Manston site with regards to housing requirements and mixed-use development.</p> <p>This is line with Objective 2 of the Department for Environment: Food and Rural Affairs single developmental plan updated 23 May 2018, the National Planning Policy Framework updated July 2018 and its Local Plan policies including but not limited to SP02, SP09, SP12, SP21, SP23, SP34, SP36, E10, E05</p> <p>Commercial aviation is not viable at the Manston site.</p> <p>A 24/7/365 cargo hub will blight tourism, regeneration, economy, heritage, employment growth and health of Thanet residents.</p>	864		Web

					<p>limited assets and finance, no registered Persons with Significant Control and a corporate structure that lacks transparency. Which is owned 90% by a Belize entity.</p> <p>2. RSP have done an inadequate Consultation and provided a derisory Funding Statement and have an investment structure which looks designed for aggressive tax avoidance.</p> <p>3. RSP rely on an insufficient and flawed business plan produced by a connected person to RSP who has no background in economics or in the air-cargo freight industry. A great number of qualified experts have shown that Manston is not viable or feasible.</p> <p>4. RSP has shown no demonstrable commitment or connection to the air-cargo freight industry or any demonstrable commitment or connection to employment in Thanet through direct employment.</p> <p>5. The lack of viability of Manston has previously also been confirmed in the 1993 Department of Trade and Industry Report, confirming it was not suitable for development as a major airport due to close proximity to the town, and as recently as 2017/18 in Avia's independent report, commissioned by TDC themselves, which also "concluded that airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the period to 2031".</p> <p>6. Manston has closed 8 times before. It is irresponsible to expose Thanet to another failure. I don't think Thanet as a region can take the hit of another failed airport business both publicly as well as a community.</p> <p>7. Specifically, I believe the council has been negligent in its duties with regards to the RSP proposal and its impact on the Community - Housing:</p> <p>8. RSP Proposal directly prevents the lawful owner's development of some 25% of Thanet's Local Plan housing requirements as well as GPs, schools, business space and recreational facilities on the site.</p> <p>9. RSP Proposal has directly caused the draft Local Plan (endorsed by Thanet District Council but opposed by its officers) to push 2500+ houses to be built on Greenfield sites and in areas with little or no additional infrastructure (if RSP is successful at achieving a DCO).</p> <p>10. RSP Proposal uses brownfield land, which could be used to meet a significant proportion of district's housing needs.</p> <p>11. RSP Proposal directly impacts around 900 listed buildings of which five are Grade I and eleven are Grade II (and therefore cannot have double glazing) and around 400 of which are residential.</p> <p>Specifically, I believe the council has been negligent in its duties with regards to the RSP proposal and its impact on the Economy - Tourism and Film (Economic and Opportunity Loss) and the significant and severe impact it will have upon Ramsgate's ability to achieve any of Policy SP09 - Ramsgate:</p> <p>1. A 24/7/365 cargo hub is not consistent with and will blight significant heritage projects in Ramsgate, which have received circa GBP 10m in private and public regeneration funding since the closure of the previously failed airport. Many of these sites have opened only in the last year and their contributions to tourism have not been quantified. For example St Augustine's visitor centre (GBP 1.2m) which had 10,000 plus visitors last year and the Royal Victorian Pavilion Wetherspools (GBP 4.5m) which has a capacity of 1,400 and is Britain's largest Wetherspools and received significant national press. A 24/7/365 cargo hub is not consistent with the Lords Select Committee Regenerating Seaside Towns. A 24/7/365 cargo hub is not consistent with the draft Local Plan.</p> <p>2. A 24/7/365 cargo hub will negatively impact proven economic benefits and opportunity loss in the Tourism and Film market.</p> <p>3. In 2014, the previously failed airport closed. One year later tourism had shot up. Research by Visit Kent published at the end of 2016 shows that in that one year after the</p>	<p>Further, the impact of and congestion on road vehicles and HGVs used to transport air-cargo, workers, passengers and fuel travelling to and from the proposed airport on Kent's road transport infrastructure and the associated carbon, nitrogen oxides and particulate matter emissions, noise and air pollution - on Thanet's and Kent's villages, towns and businesses is unacceptable nor has it been subject to a Health Impact Assessment; and - nor have travel times for all East Kent stroke victims to reach stroke unit in time as the nearest stroke unit is likely to be moved to William Harvey Hospital in Ashford been addressed.</p> <p>Further, it is a brownfield site which could be used to meet a significant proportion of district's housing needs instead the draft Local Plan (endorsed by Thanet District Council but opposed by its officers) has pushed 2500+ houses to be built on Greenfield sites and in areas with little or no additional infrastructure.</p> <p>Further, Official Nomis statistics show that employment in Thanet has grown 13.8% since the closure of Manston Airport. General employment growth in Thanet mirrors 23% jobs growth in Tourism since closure of Manston. We must back winning strategy/proven success by investing in Heritage, Arts, Culture and Active Lifestyle related Tourism.</p> <p>Further it will destroy and diminish Thanet's landscape character and local distinctiveness.</p>			
--	--	--	--	--	---	--	--	--	--

					<p>airport closure (ie for 2015) £293 million was spent in Thanet as a result of tourism and 7312 jobs supported, 6403 tourism jobs, 909 non-tourism jobs. These numbers are based across all of Thanet.</p> <p>4. Currently much of Thanet's tourism is day-trip based.</p> <p>5. To mitigate the costs of day-trips to each of Thanet's towns and to reap the economic and financial benefits of overnight trips (weekend and week-stays) Thanet needs to continue to provide and build upon an offer to tourists across all of Thanet. This is even more relevant with BREXIT and the rise of the stay-cation. A 24/7/365 cargo hub will blight this opportunity.</p> <p>6. A 24/7/365 cargo hub is contra to Thanet and Kent's marketing campaign Visit Thanet, Active Ramsgate and Explore Kent. RSP proposal and waiting will blight this proven revenue stream with economic and financial benefits and there is an opportunity loss for Thanet as well as Ramsgate.</p> <p>7. The Visit Kent Summer campaign research shows the most 'likes', 'reactions', 'shares' and 'comments' on social media were Viking Bay, Hever Castle and Ramsgate. This will no longer be the case with a 24/7/365 cargo hub.</p> <p>8. Ramsgate was named amongst Canterbury and Sandwich in a top ten of the most beautiful towns and cities of England in 2018. This will no longer be the case with a 24/7/365 cargo hub.</p> <p>9. Since the closure of the previously failed airport many tourist attractions have opened/ reopened and visitor figures have not been fully appreciated and quantified. For example: the Arches at the Royal Harbour (opened 2013/2014), the Ramsgate Tunnels (re-opened May 2014), Ramsgate Music Hall (voted best small venue by NME in 2015), Royal Victorian Pavilion (re-opened August 2017 with a 1400 capacity), and St Augustine's Visitor's centre (opened 2017). A 24/7/365 cargo hub will blight these revenue streams and positive growth.</p> <p>10. Since the closure of the previously failed airport many boutique 4/5 star hotels have opened. For example: Albion House built in 1791 voted The Telegraph's "The 50 Most Romantic Hotels in Europe" - in at number 15 (March 2017), The Times "20 Great hotels for a Weekend away" in at Number 10 (March 2017), The Times "Best Places by the Sea" (Number 26) (May 2016). The Falstaff built in 1801 within the West Cliff conservation area as well as three seaside vacation apartments. In addition to the Landmark Trust's Grade I listed the Grange (1844) holiday home. A 24/7/365 cargo hub will blight this revenue stream and positive growth.</p> <p>11. As well as its sandy beaches and rich designated historical and heritage, Ramsgate's main attraction is its coastline, which led to the creation of one of the largest marinas on the English south coast. A 24/7/365 cargo hub will blight Ramsgate as a holiday destination.</p> <p>12. The unprecedented night flights and sheer number of daytime flights would severely impact this part of the Tourist market, as few visitors would want to stay in accommodation, walk on a coast and visit our heritage and historical sites with such significant noise and visual detriment day and night. A 24/7/365 cargo hub will blight this revenue stream and positive growth. and there is an opportunity loss for Thanet as well as Ramsgate.</p> <p>13. Since the closure of the previously failed airport many exceptional restaurants, café, bars, have opened which have garnered national press coverage, 4/5 star ratings on TripAdvisor, 4 in Hardens all adding to the food scene and café culture at the harbor side. A 24/7/365 cargo hub will blight this revenue stream and positive growth and provider of jobs.</p> <p>14. Since the closure of the previously failed airport Ramsgate has been a location for film and TV. A 24/7/365 cargo hub will blight this revenue stream and positive growth.</p>				
--	--	--	--	--	---	--	--	--	--

					<p>15. Since the closure of the airport Ramsgate has hosted British Kitesurfing championships 2018, is part of the 28-mile circular Viking Coastal Trail (one of the most attractive leisure cycle routes in Kent) which links up with Regional Route 15 of the National Cycle Network, has 2 canoe trails, seal and bird watching walks and our walk from the Royal Harbour to Margate Walk was voted in the list of the Top 100 Walks in Britain in 2018. A 24/7/365 cargo hub will blight this revenue stream and positive growth.</p> <p>16. A 24/7/365 cargo hub will blight enjoyment and impact on this revenue stream of active, cultural, historical and heritage holidays. Business will suffer. Job market will contract. TDC has not identified and quantified economic loss and opportunity loss for Ramsgate and Thanet in the event that the airport is re-opened. Past performance strongly indicates that the day flights will slow or reverse Tourism growth in Ramsgate and it will limit the Visit Thanet tourist offer significantly. Presumably night flights will do so even more.</p>				
Jull		9	Deal & Walmer Chamber of Trade	Observation	Deal and Walmer Chamber of Trade strongly supports the safeguarding of Manston Airport for future aviation use in this update of the Thanet District Local Plan. It has the potential to generate unique employment opportunities that cannot be replicated at any other location in the region. There are already sufficient land allocations for non aviation employment use in Thanet, Dover and Canterbury districts yet to be taken up. An operational airport will have a positive economic impact beyond Thanet district which should not be disregarded in favour of a short term requirement to fulfil a housing quota.	The Manston Airport site will not be allocated for non aviation related uses before the Local Plan is due for review.	16		Web
Kelly	June	261		Support	. It is important to retain Manston Airport for future of Thanet.	Manston airport should be removed from the Brown Field Register.	794		Web
Kirkaldie	Malcolm	382		Observation	Stone Hill Parks (SHP) proposal significantly addresses the planning failures of Housing/Woodland/Open Spaces/ since the year 2000. TDC's housing allocations is a reckless way to plan anyones future.		1123		Email
Kirkham	Bernard	14		Support	It is not good that the issue of Manston stays on hold. I oppose aviation there on several grounds. This only keeps alive the sentimental attachment to the airfield which is so powerful. Will we have to wait for this generation, of which I am a part, to die off?		23		Web
Koch	Linda	128		Object	The decision "not to allocate the Airport site for any specific purpose in the draft Local Plan", that is, not to allocate housing to this site, is not evidence-based and is not sound given the independent expert advice that has made it clear that aviation at Manston airport is not viable, in the short term or long term.		287		Web
Latchford	Barry	45		Object	Stated. " To ensure that the NSIP-DCO process is not prejudiced, the Council is proposing not to allocate the Airport site for any specific purpose in the draft Local Plan." Allocating the site for a specific purpose does not prejudice a NSIP-DCO, any outcome of which would over-ride any decision made by council. The only motive therefore is to undervalue the privately owned land in order to assist a third party in possible acquisition. I'd suggest this is not the job of the council and could even be challenged on the basis of legality.	The land should be zoned for mixed development as required by the current owners. This would allow their sound business plans to be progressed and would be over-ridden in the unlikely event of a DCO being granted.	105		Web
laven	john	247	Mrs	Object	I am opposed to persuing Manston as an airport and thoroughly support its mixed use status.		758		Web
Lee	A	133		Object	Anyone who has travelled by air from Gatwick, Heathrow or Stansted this year would question why Manston is not viable as an airport. More direct action needs to be made on promoting Manston to airline companies as a way forward. I question a plan that highlights Thanet's tourism past and future hopes yet does not consider an airport as part of tourism.		321		Web
lee	Alan	229		Object	I am against the building of any houses on Manston Airport now or in the future. Manston Airport is an asset we can afford to lose .I believe it will bring direct and indirect jobs to the area and play its part in training our young people for a future in aviation.		697		Web
Lister	David	243		Observation	Manston Airport should be removed from the TDC Brownfield Register. Policies EC4 and	Takes too negative view of the airport	742		Web

						SP05 or their equivalent should be kept. Manston is of national important and the airfield a potential future source of many jobs.	potential			
Lucas	David	215			Observation	<p>Regarding Manston Airport, I feel it is extremely important that it retains its “aviation use only” status. Thanet is in a unique and advantageous position to be become a very significant player in the growing aviation industry nationally, which will obviously be a very important in the rejuvenation of mainly Thanet but also the whole of the SE. It would be utter madness to lose the gift that we have inherited and that other counties envy.</p> <p>I’m sure that the current council members do not wish to go down in history as being responsible for throwing out the baby with the bath water, so to speak.</p> <p>I therefore urge council to retain policies EC4 and SP05 or an equivalent, and that Manston must be removed from the TDC’s Brown Field Register.</p>		660		Web
Mackay	Rebecca	10	Miss		Observation	<p>I live in Manston (since Jan 2018) so I may have missed out on any previous consultation. But I would like to know what the DCO proposes to do to improve the infrastructure for local residents adn possibly new residents if the DCO is granted. Our Public transport is really bad here. Buses to the doctors (to get to an appointment are ZERO, transport fo Westwood Cross or Ramsgate Margate and Broadstairs are poor and do not suit people needing to go daily and regularly (as I do) without a car. Also we have NO SHOPS. We can't buy milk or basic groceries. So, if we are to suffer from having a cargo airport will there be benefits of improved services, shops, transport etc to offset this?</p> <p>Also will Manston residents be consulted if the DCO is granted?</p> <p>Will there be jobs and/or career opportunities for local people?</p> <p>What will the impact of noise poluution on our village be and why haven't we been given any information on this?</p> <p>I support anything that is good for Thanet to be developed in a way that benefits Thanet and its residents and its prosperity, rather than just private concerns and private businesses, so I don't object per se to this, I simply think we deserve regular updates (nothing's been put through our doors from the DCO applicants saying what they want to do and why and what they hope to achieve for the broader good).</p> <p>Will there be an obligation to build affordable housing or provide building plots? If so will the infrastructure come along with it?</p> <p>I think Manston's future has been in limbo for a long time and it's only fair that us living with it should ge given more information on it. Please consider the residents when there is any new updates.</p> <p>Will it affect the value of my home?</p> <p>There are so many questions, I'm just concerned that we've been left out (certainly this year as Manston's future has been the subject of press and media much more prevalently) and I hope we have the right to consider the facts before the cargo consortium (private business I assume?) moves in and changes our lives.</p> <p>Many thanks for listening. I really look forward to feedback.</p>	I 'm coming from a perspective of local impact as a resident.	18		Web
Marsh	Richard	242	Mr		Support	<p>Hi</p> <p>Manston Airport should be saved from development as we need flights, cargo flights and jobs. Manston can ease cargo routes from all the airports around the M25.</p> <p>Policies EC4 and SP05 (or equivalent) should be retained and Manston Airport should be removed from the TDC Brown Field Register.</p> <p>With the decisions from Brexit for EU and International Trade about to be finalised, Manston will be an asset in an airport capacity, not more houses!</p> <p>Yours</p> <p>Richard Marsh</p>	The UK needs more airports and airport capacity, don't lose Manston	738		Web
May	Raymond	238			Object	The Council supports future aviation use at Manston despite the reports it has commissioned in the past which refute aviation use as uneconomic option for Manston		724		Web

						<p>and which the airfield is not even mentioned in in national plans for the development of aviation gong forward in Britain. Moreover the Council's decision to vote for option 2 of the Local Plan, in regards to housing, goes against the Government's preferred choice of using brownfield sites wherever possible. The decision means that 2,500 houses earmarked for the Manston site will now be built on agricultural land in Margate, Westwood, Westgate, Birchington and Minster.</p> <p>The Council gives scant regard to the legal owners of the Manston site (Stone Hill Park). Their 'mixed use" development plans are a good deal more realistic and achievable than RSP's freight hub dream. And one that will not affect the sleep and damage the health of thousands of Thanet residents, in terms of regular night flying, and air borne particulates.</p>				
McCulloch	Andrew	44			Observation	<p>Manston Airport. Things are moving rapidly here at the moment but it is to be hoped that the site will be returned to full aviation use before this plan is agreed. The present fudge is probably the best of a bad set of choices.</p> <p>A final thought on the prospect of major and high density development on this site. The Isle of Thanet derives its drinking water from the aquifers below the chalk, as shown on the attached diagram from TDC's own Water Cycle Topic Paper of May 2013.</p> <p>Thanet's groundwater is extremely vulnerable to contamination as substances (natural substances and man-made chemicals) are able to pass rapidly through the thin soils and the natural fissures (cracks) in the chalk rock to the groundwater below the ground surface.</p> <p>Once the chalk and groundwater is contaminated at a site by a substance it can take decades to clean up. The Council and the Environment Agency have worked hard to prevent contamination by consistently applying groundwater protection policies to any proposed land-use changes in Thanet to reduce potential future impact.</p> <p>Under the Water Framework Directive (WFD), the 'Kent Isle of Thanet Groundwater Body' has been classified as poor status for the groundwater quality and quantity. The groundwater is impacted by nitrates, pesticides, solvents and hydrocarbons at levels that are of concern. (Water Cycle Topic Paper May 2013)</p> <p>Given the time that this Plan will be in consultation there is the likelihood that the present owners of the site may move in and redevelop in ways that are contrary to the intentions of this Plan. To this end the Planning Committee should make it clear that no consent will be forthcoming for development on this site until the 2031 Local Plan has been adopted.</p>		103	Thanet ground water body.jpg (145 KB)	Web
McIntyre	R	506			Object	<p>The draft Local Plan was submitted to the Council on 18th January 2018. It represented years of work in gathering evidence and assessing options. In that draft of the Local Plan, SP05 allocated the disused airfield at Manston for mixed development, including 2,500 homes. The draft Local Plan said: "Based on SA assessment, option NS5 (the former airport site) was deemed the most likely opportunity to provide a sustainable new settlement due to its size, which would allow comprehensive provision of uses and facilities, and its unique status amongst options as a brownfield site." [Emphasis added]</p> <p>The SA concluded that the former airfield would be "the most sustainable site" for development as a strategic housing site.</p> <p>The Council arrived at that decision having commissioned independent expert advice from Avia on the future viability of the disused airfield site as an airport. That evidence-based advice was that the site was extremely unlikely ever to be viable as an airport, particularly as a freight airport. This echoed previous expert advice provided for the Council on the</p>		1425		Web

					<p>future availability of the airport by Falcon. There is no independent expert advice that suggests that the site is capable of being redeveloped as a viable airport.</p> <p>On 18th January 2018, with no evidence to support the decision, the Council decided that "the former airport is currently subject to a Development Consent Order application and its current lawful use is for aviation activities. It has since been considered that the allocation of the site as a new settlement would not be appropriate if it might jeopardise any future aviation use." This is not an evidence-based decision, it simply reflects the preference of a number of Councillors to have an airport on that site. Moreover, part of the purpose of a Local Plan is to consider whether a site's allocation in the previous Plan (and TDC's previous Plan is many years out of date) is still appropriate in the light of current and future local needs, current evidence and current Government strategy. It is not an evidence-based approach to say "the site's current allocation is for aviation so we'll stick to that in case changing it prevents it becoming an airport at some unknown time in the future." Councils are not permitted to sterilise sites for years along the lines of former allocations if those allocations are not sustainable now and in the future on the evidence. TDC has independent expert advice that spells out the fact that it is not sustainable to retain the old airfield for aviation as the site is extremely unlikely to be viable as an airport in the future.</p> <p>The Council now says about the airfield site that: "The site is sustainable [as a mixed use development] subject to mitigating criteria, is located on brownfield land and is consistent with other environmental policy and guidance. However, it was agreed at Full Council that the airport site should not be considered for allocation until the DCO process is concluded." "To ensure that the NSIP-DCO process is not prejudiced, the Council is proposing not to allocate the Airport site for any specific purpose in the draft Local Plan." A private developer, RSP, wishes to take the airfield site via a DCO and develop it as a national freight airport. That developer's case has been considered by independent aviation experts Avia and York Aviation. Avia said that the RSP submission does not put forward "a sufficiently credible case, nor provides the evidence, for AviaSolutions to change its views on the financial viability of Manston Airport". York Aviation, on whose work much of the developer's aviation case rests, said that RSP had misunderstood York Aviation's work and that York Aviation does not think that a freight airport at the old airfield site will be viable.</p> <p>In the face of expert reports by three independent and well-known aviation consultancies - Avia, Falcon and York - the Council has decided to sterilise the site in the hope of making it easier for a private developer to acquire the site for aviation at some stage. This is not sound.</p> <p>Furthermore, a number of the Councillors who voted to remove the airfield from the Local Plan as a strategic mixed use site did so because they feared that allocating the site as mixed use would increase its value, making it more expensive for RSP to acquire the site if a DCO is awarded. It is extremely unsound for a Council to be using its Local Plan to influence the value of a site so as to improve the potential financial reward for a private developer.</p> <p>Finally, having taken this step, the Council has now had to rush to find alternative sites for 2,500 homes. This has brought a number of green field sites into play as housing sites that had previously been rejected or not needed for this Plan. This preference for green field development over brown field development is against Government policy.</p> <p>The Council's officers advised the Council correctly. Removing SP05 as a strategic housing and mixed use development site and retaining aviation as an allocation for a site which has been closed as an airport for four and a half years is unsound. It is also unsound to have no allocation for the site - this would leave the district's largest brown</p>				
--	--	--	--	--	--	--	--	--	--

						field site derelict for years, The Council risks its Plan being overturned by the Inspector. Following the evidence and Government guidance, there is no justification to retain the Airport designation during the period of the Local Plan or to leave it as a site with no designation such that it remains untouched for the life of the Plan.				
McNamara	Francis & Yvonne	183			Object	<p>Referring to the DCO process being not prejudiced seems to us in itself to be prejudicial by the council, as surely a DCO process should never be considered as part of the local plan, as the outcome cannot be taken as a certainty. So therefore to not allocate the airport site for any specific purpose is surely negligent on behalf of the council when it is the biggest brownfield site in the whole of Thanet, when at this time the council is taking greenbelt land (farmer's fields) to build housing on.</p> <p>Referring to the sentence "in the meantime the site has existing use for aviation" is surely inaccurate! As it has never had planning permission to be an airport, operating under a 106 agreement of uninterrupted use relating to the RAF base. There are only four buildings on the site that has ever had planning permission for aviation use only. The airport has now been closed since May 2014 and aviation operations ceased at that time. The only use the site has had since the closure is for Operation Stack for the Government. Therefore, existing use is for lorry parking not aviation!</p> <p>In the event that a DCO/CPO is not granted, the council will decide the best use for the site. Surely the best use for the site is what is being proposed by the legal owners, Stone Hill Park, for mixed use development. comprising of a mixture of housing, quality employment, infrastructure, leisure facilities, heritage aviation and a country park. This is what was proposed in the original draft local plan in January 2018 and was voted down by the now new council leader! Any delay that keeps this site empty is surely an act of negligence on behalf of the council, because it will not be reviewed again until after a minimum of two years!</p>	Go back to the original draft local plan which adopted mixed use development for the site because it was evidence base and this one is not.	532		Web
Mehmet	Adem	318			Observation	<p>In the draft Local Plan submitted to the Council on 18th January 2018, SP05 allocated the disused airfield at Manston for mixed development, including 2,500 homes. The former airport site, which had not attracted any interest from aviation companies to use as an airport was deemed the most likely opportunity to provide a sustainable new settlement due to its size and its unique status amongst options as a brownfield site.</p> <p>This decision was reached following paid for independent expert advice from Avia on the future viability of the site as an airport, advice that stated the site was extremely unlikely ever to be viable as an airport, particularly as a freight airport. This enforced previous paid for expert advice provided for the Council by Falcon and has subsequently been supported by York Aviation and others. There is no independent expert advice to suggest that the site is capable of being redeveloped as a viable airport.</p> <p>On 18th January 2018, the Council decided that as the airport is currently subject to a Development Consent Order, allocation of the site as a new settlement would not be appropriate if it might jeopardise any future aviation use. This is not how allocations regarding a local plan are meant to be determined. Allocation of the site for aviation only would need to be supported by an evidence base and not simply reflect the preference of a number of Councillors to have an airport on that site.</p> <p>It is not for Councillors to protect a site so that a DCO sponsor can acquire it at a low price. It would seem that both our Councillors and MP's are working at the direction of RSP, the DCO sponsor, in their quest to acquire the site cheaply. The relationship between Councillors and RSP needs to be thoroughly investigated as this is not what Councillors and MP's are mandated to do by their electorate or are legally able to do. A significant number of Councillors who voted to remove the airfield from the Local Plan as a strategic mixed use site did so because they feared that allocating the site as mixed use would increase its value, as suggested by Craig Mackinlay MP, making it more expensive for RSP to acquire the site if a DCO is awarded. It is extremely unsound for a Council to be using its</p>	It is my view that Manston should be allocated for a mixed use development with the council working with the current owners to develop a sensible and sympathetic scheme taking into consideration the views of the community. This is a much better solution than allocating the 2500 houses required to other parts of Thanet.	970		Email

					<p>Local Plan to influence the value of a site so as to improve the potential financial reward for a private developer. These councillors have opened the way for serious legal challenge by the current owners and for a significant compensation payment in due course following what will inevitably be a judicial review if the local plan is allowed to go forward as currently drafted.</p> <p>The Council now say the site is sustainable as a mixed use development subject to mitigating criteria, is located on brownfield land and is consistent with other environmental policy and guidance. However at Full Council it was determined that the airport site should not be considered for allocation until the DCO process is concluded to ensure that the DCO process is not prejudiced. This is not the purpose of a local plan and is outside of the legal framework in which local plans are determined. It is not for a set of councillors with a small majority to determine in this way. The DCO is a legal process under the planning legislation and will not be prevented by any allocation in a local plan. Any provision in the local plan cannot prejudice the outcome of a DCO and therefore the council’s decision is therefore not sound or necessary. The DCO will only succeed on its merits as determined by the planning inspectorate, what the site is currently allocated for is irrelevant.</p> <p>The Council has now had to find alternative sites for 2,500 homes. This has brought a number of green field sites into play as housing sites that had previously been rejected or not needed for this Plan. This preference for green field development over brown field development is against Government policy. In addition whilst the council are now seeking to retain the site for aviation on the back of the plans by RSP for a large cargo hub, no provision is made within the plan for the requirements that this development would impose within Thanet. If the council wish to protect the site for RSP’s scheme they should also be providing for the additional road infrastructure the airport will require during construction and in operation and the additional housing and other infrastructure that will be required to support the additional jobs that RSP claim will be delivered.</p> <p>The Council’s officers advised the Council correctly. Removing SP05 as a strategic housing and mixed use development site and retaining aviation as an allocation for a site which has been closed as an airport for four and a half years is unsound. It is also unsound to have no allocation for the site – this would leave the district’s largest brown field site derelict for years, The Council risks its Plan being overturned by the Inspector. In light of the compelling evidence paid for by the council and Government guidance, there is no justification to retain the Airport designation during the period of the Local Plan or to leave it as a site with no designation such that it remains untouched for the life of the Plan.</p>					
Messenger	Carol	383			Object	<p>It is disappointing that SP05 has not been included in the plan, especially as there is an application for a DCO to return Manston back to aviation. There was of course some evidence base in the Sustainability Assessment Ove Arup states that Manston Airport remains an important economic asset and opportunity to encourage growth in Thanet. Separately, the Economic Strategy states the Experian report has been used as the guide for the number of jobs coming into the district, having read the Experian report, they did include Manston Airport as one of the job providers so without the airport it would make the figure for 5000 jobs unobtainable.</p> <p>In a recent planning appeal over buildings at Manston the planning inspector concluded “Overall, I conclude that the appeal schemes would conflict with Policy EC4 of the Local Plan, as well as its wider economic development and regeneration objectives. The</p>		1129		Web

					<p>proposals would conflict with the Council’s current approach to the location of new development within the airport, which is consistent with national policy. Benefits of the scheme put forward by the appellants do not justify departure from Policy EC4 of the Local Plan. Hence I find there are no material considerations of sufficient weight that would warrant a decision other than in accordance with the development plan. Accordingly, I conclude that the appeals should be dismissed”.</p> <p>Recently, the Department of Transport stated that Aviation Demand Forecasts, which show that the need for additional runway capacity is even greater than ever and that all 5 London airports will be completely full by 2030.</p> <p>Historically there had been a proposal that the existing land owner wanted to put 10,000 homes at Manston, I personally think the officers thought that would be a nice New Homes Bonus sum, so as a result showed no appetite to keep the airport.</p> <p>If there were to be homes at Manston my understanding is the site has been previously been determined as contaminated and any building (breaking up of the runway) could potentially contaminate the aquifer, which is Thanet’s only source of water. SP05 should have been included in the plan to protect the airport from development</p>				
Milimuka	Elle	358	GVA		<p>Object</p> <p>Local Plan Draft Policy SP05 (which allocated the former Manston Airport Site for mixed use redevelopment including at least 2,500 homes) has now been replaced with supporting text. This supporting text clarifies that the Council does not allocate the Site for any specific purpose to ensure that the NSIP-DCO process is not ‘prejudiced’ and states that it will review the status of the Site in the next Local Plan review after a ‘minimum of two years.’</p> <p>We object to this approach for the reasons set out below. Without prejudice to this representation and to the supporting evidence referenced herein, should the Inspector find sound evidence to support the latest promoted amendments and should the Inspector accept the changes now proposed, we would request that the supporting text is revised to clarify that the Local Plan review will take place after a ‘maximum of two years’ as the current policy wording does not provide sufficient certainty regarding the timing of the Local Plan review.</p> <p>The Local Plan does not seek to protect the existing airport use, nor can it lawfully do so, as the Council’s own up-to-date evidence base confirms that “airport operations at Manston are very unlikely to be financially viable in the longer term and almost certainly not possible in the period to 2031” (AviaSolutions Report, paragraph 2.5) the airport is very unlikely to be financially viable in the longer term and almost certainly not over the plan period. This evidence base comprises three separate reports from credible aviation experts AviaSolutions, two of which specifically respond to comments/concerns raised by third parties. This is consistent with the conclusions of our client's own expert aviation consultants, York Aviation and Altitude Aviation, both of whom conclude that there is little prospect of the re-opening of</p>	<p>Our client's position remains that the former Manston Airport Site should be allocated for redevelopment for alternative use, including housing. In summary:</p> <ul style="list-style-type: none"> • The Council’s evidence base concerning the former Manston Airport Site is up-to-date and confirms that the airport is very unlikely to be financially viable in the longer term and almost certainly not over the plan period. The evidence base comprises three separate reports from independent experts AviaSolutions, two of which specifically respond to comments/concerns raised by third parties. AviaSolutions conclusions are corroborated by the advice provided by our client's own expert aviation consultants, York Aviation and Altitude Aviation. There is no policy basis on which to justify a planning policy which safeguards the site for aviation use and this is acknowledged by the Council, who do not propose any policy protecting the existing use of the site. • A DCO has been accepted and must now be properly scrutinised and examined in accordance with a separate legislative process. The emerging Local Plan cannot ‘prejudice’ whether it is approved or not. Likewise, the Government has 	1050	SHP Enc2 Altitude Aviation report.pdf (4.4 MB) SHP Enc1 York Aviation report.pdf (2.9 MB)	Web

					<p>Manston Airport being a commercially viable proposition over the plan period (see Enclosures 1 and 2 respectively). The Council therefore correctly concludes that there is no evidence which justifies a policy which would safeguard the Site for aviation use and no such policy is proposed as to do so without evidence would be unsound and fail to meet the minimum requirements for a development plan.</p> <p>We note that an application for a DCO on the Site has recently been accepted by the Secretary of State and will now be the subject of a separate examination. The application has yet to undergo any scrutiny and the mere acceptance of a DCO does not, and indeed cannot, constitute sufficient evidence to justify a policy protecting the Site for aviation use. Members' desire not to allocate the Site for alternative use so as not to 'prejudice' the potential for a DCO to be granted is unfounded. The DCO will be determined through a separate process and must meet all necessary tests under the Planning Act 2008 (as amended), which does not require presumption in favour of the development plan and does not apply s38(6) of the Planning and Compulsory Purchase Act 2004 in the same way that planning applications are considered, in order to be granted.</p> <p>Stone Hill Park's position is that the former Manston Airport Site should be allocated for comprehensive mixed use development. This echoes the views expressed by the Council's own officers. There is an acute, sustained housing need in the District, the Council has consistently failed to meet its annual housing delivery targets, and the District does not have a five year supply of housing (as confirmed by appeal decision ref. OL/TH/11/0910 and as summarised in the Planning Statement Addendum: Housing Need included at Enclosure 2). The Site provides the opportunity to plan for sustainable growth in a way which will deliver a large proportion of the District's housing need in a comprehensively designed new settlement, with sufficient critical mass to deliver necessary infrastructure and services, including the delivery of a key transport link between the A22 and Manston Road forming part of the Council's Transport Strategy. It will embed the principles of sustainable development at its heart, providing the backbone upon which this new community will grow and evolve over time. A full suite of environmental and technical evidence has been provided to the Council in support of the May 2016 hybrid application (ref: 16/0550) as well as the enhanced masterplan for 3,700 homes which was submitted in May 2018</p>	<p>confirmed that the Local Plan must proceed and should not be delayed for the DCO process to be concluded.</p> <ul style="list-style-type: none"> • Our client's position remains that the former Manston Airport should be allocated for comprehensive mixed use redevelopment including at least 2,500 homes over the plan period. The development potential of this vacant, brownfield site should be optimised in accordance with the principles of sustainable development. • The alternative Strategic Sites put forward for the Council to would require development of agricultural and greenfield land. It is also unlikely that they will generate sufficient critical mass to deliver necessary infrastructure and are therefore likely to place additional pressure on existing facilities and services. Like Officers, we consider that the redevelopment of the former Manston Airport Site for one comprehensive development is preferable to this 'piecemeal' approach. • Furthermore, we are not convinced that the quantum of homes proposed in these locations have a reasonable prospect of being delivered over the course of the plan period in any event as there is no evidence that they are all available, deliverable and achievable. 			
--	--	--	--	--	---	---	--	--	--

						(ref: 18/0660) which confirms that the Site is suitable, deliverable and viable for delivering the mix and quantum of development proposed. We refer the Inspector to these applications for the full details of the planning case and evidence in support of Stone Hill Park's plans.				
Millwood Designer Homes Limited		508	Millwood designer Homes Limited	Anna Gillings - Gillings Planning Ltd	Object	This paragraph states that “if a DCO or aviation use at the site is granted this would require a partial review of the Local Plan in relation to housing land supply provision....” This policy is ambiguous and should be confirmed that any partial review of the plan in respect of housing land supply will not seek to remove any of the proposed allocations, but rather, relate to the phasing of delivery of units. It is critical the Plan provides long term certainty on the proposed allocations in this respect	“ If a DCO for aviation use at the site is granted, this would require a partial review of the Local Plan in relation to the phasing of housing land supply [delete - provisions], aviation and environmental policies and other related matters”	1427	Gillings Millwood.pdf (74.4 MB)	Web
Miss P A Smith		395			Observation	I at this stage wish to comment that I am in agreement with the proposal for a DCO for the Airport as I am in agreement with its reopening.		1271		Paper
mullin		5			Object	I strongly object to the proposals linked to the reopening of Manston airport. To put this simply, the airport has never worked and by trying to make it into a cargo hub is pure folly. Why is the current council so hell bent on opening this venture when all of the evidence provided is of the contrary. The current owners appear to have a safe and proportionate plan for the site, whilst the RSP bid has again and again fallen short on evidence and funds (especially with regards research into environmental impacts especially the enviromental statement approach in the Scoping Opinion) and Kent County Council lost £300,000 in the venture. . Why is reopening a huge risk so appealing to Thanet District Council, especially as given the councils record, we the tax payer have to bail them out (Ramsgate Port for example). Please remove the white elephant of reopening Manston airport from this local plan and study all of the evidence more carefully, its homes and jobs that are needed not polution, noise and the huge debt to council tax payers when the airport goes bust. (And wasn't Tony Freudmann of current RSP the managing director of Manston when the airport previously went bust?) If this motion is passed then we are all going to be taken for a ride, and end up much the same as Northamptonshire Council, Thanet has enough poverty already. Thank you for the opportunity to comment.		8		Web
N		257			Object	There have been various reports on Manston being vialbe, initiated by the council, the Avia report being the last one, all say that the airport is not viable as an airport due to the location, and yet this local plan puts aside the evidence in favour of a company that has yet to prove to the Planning Inspectorate that it has the money to even DCO the airport, let alone run it or make a profit. This plan allowing them to do that is FAR from being evidence based. How was this even allowed to go through against the advice of experts and officers recommendations? I fail to see how the other elements of the plan hold up with the vision for jobs and promoting tourism, when the option of a cargo hub, that will cause damage to the area, both financially with the loss of tourism and the limited job capacity that it has, outweigh the other alternatives for the site. Why has the council not worked with the owners at Stone Hill Park to secure a mixed use development site with housing allocated onto the brownfield site, to help with keeping our greenfield sites preserved? Is it evidence based to preserve the airport site for the time specified in this draft local plan, when , as a brownfield site it could be put to more use quicker? What is going to happen to this site as it festers, waiting for a Belize backed company with no aviation experience to acquire it, when the rest of Thanet is being shrunk due the houses going on greenfield sites? Not to use Manston now is foolhardy, but what's worse is that the draft	Follow officers advice!	784		Web

						local plan is not evidence based in its preparation.				
Newing	April	322	Dover District Council		Support	<p>Manston Airport</p> <p>The future of the former Manston Airport site is considered to be a cross boundary issue given its proximity to the Dover District and the transportation and employment interactions it has on the local area. The location of the site to Discovery Park, Sandwich and Kent County Council's (KCC) proposed Thanet Parkway Railway Station at Cliffsend, combined with commitments in investing in key infrastructure (e.g. strategic network improvements), will offer the opportunity to further enhance domestic and international connectivity and attract inward investment to East Kent.</p> <p>As part of the formal consultation on previous iterations of the draft Local Plan to 2031, DDC detailed its concerns in relation to Policy SP05: Manston Airport allocating the former Manston Airport site for mixed use development. However, this policy has since been removed following the submission of a DCO application for an alternative use for the site and TDC proposes to not allocate the site for any specific purpose in the draft Local Plan.</p> <p>DDC offers its support to RiverOak Strategic Partners' (RSP) proposal to re-open Manston Airport as an operational freight-focused airport and recognises the positive contribution it would make to the regeneration of the East Kent economy and meeting East Kent priorities.</p> <p>The proposed development is supportive of the following motion passed by the District Council in July 2014 in relation to the former Manston Airport site:</p> <p>"The Council supports the campaign to retain Manston as an operational airport, recognising the role and place it can have in the UK aviation industry, making better use of regional capacity in accordance with the views of the South East Local Enterprise Partnership, while making a significant contribution as on the strategic priorities for regeneration of the East Kent area."</p> <p>The District Council notes paragraphs 1.44 and 1.45 regarding the consideration for a Local Plan Review upon the determination of the DCO process and would welcome early and continuous engagement with TDC in relation to the future of the former Manston Airport site.</p>		979		Email
Norton	Thomas	167			Object	<p>My response to the Thanet Local Plan I am against the Thanet Local Plan as I oppose granting a DCO 24/7 Freight Hub at Manston. When Stone Hill Park put in their application for the former airport site, which included an Olympic sized swimming pool (much needed as the one in Ramsgate is just not big enough!), surfing centre, many different leisure areas, medical centres, business and manufacturing units, and yes, some housing but with the infrastructure to support them, I thought things were looking up for the area. Their plans would bring in much needed jobs and investment to the area; and people would be more likely to visit the area to use the aforementioned recreational facilities. After failed attempts at running an airport on the site the council commissioned a viability study by Avia Solutions which concluded that airport operations at Manston would be unlikely to be financially viable, as has already been proven by former owners of the airport. Other reports done previously have also concluded that an airport would not be viable and would not be an economic proposition. The roads in Thanet and Kent as a whole are not suitable for the amount of extra lorries that would be needed to transport the freight from the proposed freight hub. Roads which are already constantly overloaded even when there is no operation stack! All the extra traffic would have to use the already very congested M25. We suffered before with old freight planes going over our houses at about 450ft day and night, with decibel readings of 90db and above. If the airport opens as a freight hub it will be even worse than before, so all residents will suffer from a lack of sleep and added pollution, resulting in many health problems and thus putting a further</p>	TDC councillors should listen to officers advice and re instate the plan they agreed. This plan does not meet government guidelines as there is no evidence whatsoever to support it. It is very doubtful it will pass government scrutiny.	486		Web

					<p>strain on the Health Service. Ramsgate has just begun to thrive and the area has improved for the better. A cargo hub would stop people investing in the area, many jobs would be lost and tourism in the area would fall because no-one will want to visit an area where you cannot hear what is being said or it is impossible to get any sleep! The RSP documentation even states that it will have a permanent adverse effect on the area and on people's lives. So surely if the council has any concern for its residents it should just wake up and put in place the plans which will benefit the area as a whole. Surely the time has come to realise that whoever attempts to run an airport on the site is just wasting money and time which would be much better spent by the current owners to provide us with something that will benefit us all instead of blighting our lives, damaging our health and polluting the area and making the area the biggest environmental disaster in the country. The council has allowed many houses to be built in the area, getting closer than ever to the airport site, and now these residents along with the rest of us need the council to look after and work in the best interest of us residents and not RSP, a private company. RSP has already failed twice to prove to TDC that it has funds or business plans to develop Manston unlike Stone Hill Park project that would benefit Thanet not blight it! The last thing that Ramsgate needs is planes going over our homes 24 hours a day, 365 days a year. That would deprive us of our right to sleep at night, polluting the air, devaluing our homes, which we have worked hard for, interrupting school lessons, so our children would be unable to concentrate and therefore their future potential will not be fully realised. We think TDC should re-think the local plan.</p>				
Norton	Mrs.	177		Object	<p>This is my response to the Local Plan.</p> <p>I am against RSP being granted DCO to open a freight hub at Manston.</p> <p>Stonehill Park had a fantastic planning application to build not only houses but many leisure facilities which would enhance the lives of the local people and bring many more people into the area. The Olympic sized swimming pool is very much needed as the Ramsgate one is just not big enough. The surfing centre would be amazing. Many different leisure areas were to be included. Business and manufacturing units which would provide many jobs. The houses were to be supported with health facilities and school. Their plans would bring jobs and investment to the area, and people would be more likely to visit the area to use the aforementioned facilities.</p> <p>After failed attempts at running an airport at Manston, the council commissioned viability studies which concluded that airport operations here would be unlikely to be financially viable, as the failed attempts had already told us!</p> <p>Ramsgate has at last begun to recover since the airport closed and has improved for the better. A cargo hub would stop people wanting to invest in the area, jobs and tourism would fall once again. Nobody will want to visit an area where you are unable to hear what is said and it is impossible to get any sleep.</p> <p>We suffered with freight planes going over our house at 450ft during the day and night. Decibels readings of these flights were about 90db. We suffered from lack of sleep then, and once you are awoken it is very hard to get back to sleep. If it opens as a freight hub it would be worse than it was, so all residents will suffer from a lack of sleep, resulting in many health problems and thus putting a strain on the very stretched Health Service, factor in the added pollution and it becomes a nightmare.</p> <p>The RSP documents state that it will have a permanent adverse effect on the area and on people's lives. If the council has any concern for the residents it should scrap all plans for the airport and let the current owners get on with their plans to improve the area for all not just a few!</p> <p>We do not need planes going over our homes 24 hours a day, 365 days a year. That would deprive us all of the right to sleep, pollute the air and devalue all our homes, interrupt school lessons, meaning my grandchildren and all others here would not be able to</p>	Remove the clause protecting the former airport as a site for aviation use only, and designate it as mixed development site.	502		Web

						concentrate properly and therefore not be able to achieve their full potential in their future. A fact that I am extremely worried about as I want the best life possible for my Grandchildren. I think it is only right that TDC should re-think the local plan.				
O'Callaghan	John	73			Support	The plan agreed by Thanet Council is the best that can be proposed, for the future prosperity and growth of all areas of Thanet. For far too long Thanet has been struggling to cope with the need for new housing and employment opportunities. Regeneration on a massive scale is needed to keep up with other areas of Kent. Manston International Airport is at the centre of this regeneration. Social housing is a necessity, but not an excuse to build 4/5 bedroom houses on the back of any such proposals.		184		Web
Owen	Keith	260			Object	When the draft Local Plan was submitted to the Council in January 2018, SP05 allocated the disused airfield at Manston for mixed development, including 2,500 homes. The Plan stated that "option NS5 (the former airport site) was deemed the most likely opportunity to provide a sustainable new settlement due to its size, which would allow comprehensive provision of uses and facilities, and its unique status amongst options as a brownfield site" and the SA concluded that the former airfield would be "the most sustainable site" for development as a strategic housing site. This conclusion was reached following a TDC commissioned evidenced-based report from Avia on the future viability of the disused airfield site as an airport, which concluded that the site was extremely unlikely ever to be viable as an airport, particularly as a freight airport. A previous report commissioned by TDC (Falcon) came to the same conclusion and a third expert report (York Aviation) recently also reached the same conclusion. There is no independent expert advice which suggests that the site is capable of being redeveloped as a viable airport. The council has now changed its stance on this and in essence has in essence stated that, we'll keep the site's current allocation for aviation in case it prevents it the site becoming an airport some unknown time in the future. This is neither evidence based or sound. The council officers are aware of this, but a group of Local Councillors voted down the original plan and insisted on these changes in order to depress the value of the land so that any future DCO might be more affordable to the Belize registered company RSP. This has also had the unfortunate consequence of the council allocating alternative sites for 2,500 homes on a number of green field sites. This preference for green field development over brown field development is against Government policy. Therefore, I object to the local plan on the basis that this change was not evidence based, nor sound. Indeed, the Council runs a great risk that its Plan will be overturned by the Inspector.	change the plan for the former airport back to 'mixed development'	791		Web
Padgham	Nigel	4			Observation	I support continued aviation use of Manston, and retention of the current runway in any plan (no asset stripping). I believe the Avia report was too dismissive of the massive expected increase in air transport, and the need for cargo transport while (if) Heathrow's third runway is built. Beyond 2031 is too far to call, and the expenditure on upgrading Manston very small in comparison to Heathrow or Gatwick, and the implementation timescale would be very short. However, the area North of Manston Road is very large, and could be developed for housing without an impact on the aviation business. If the asset of the current runway goes, a smaller runway would allow continued General Aviation use, and provide an amenity and encourage business if sufficiently long for business jets (not as per the Stone Hill plan), but it would not generate the same scale of employment in services or engineering, and be more fragile economically. The adjacent business park is only half occupied according to the plan, and so industrial development should be focused there. The proposed Parkway station could be just south of Manston, with the proposed		7		Web

						improvement of train journey times, it would be an ideal link for the airport, and support air passenger services to be developed in the longer term.				
Ptarmigan Land and Millwood Designer Homes		493	Ptarmigan Land and Millwood Designer Homes	Joshua Mellor - Barton Will more LLP	Support	<p>3.16 The Council has decided to progress a plan which is not dependant on housing being delivered on the former Manston Airport site. There is uncertainty regarding the future of this site, with 2no. competing proposals currently pending decision, one supporting a mixed-use regeneration of the site and the other its re-opening as a cargo airport. The later application is being treated as a Nationally Significant Infrastructure Project, with a Development Consent Order (DCO) having been submitted to and accepted by the Planning Inspectorate in August 2018.</p> <p>3.17 In line with the DCO timetable, a decision will not be made on whether the former Manston Airport site will be re-opened as a cargo airport until early 2020. Para 1.41 of the draft Local Plan acknowledges the plan has been drafted to avoid prejudicing this application.</p> <p>3.18 Nevertheless, the Council is still seeking to meet its full housing growth requirements. We note this is in line with the Secretary of State's letter to the Council dated 23 March 2018 which confirmed the future of the former Manston Airport site is not an exceptional circumstance which would allow a lower housing figure to be proposed.</p> <p>3.19 Para 1.44 of the draft Local Plan acknowledges should a DCO be granted a partial review of the Local Plan, in relation to housing land supply provisions, aviation and environmental policies, would be required. Whilst not the intention of the paragraph, it is ambiguous and creates uncertainty regarding housing allocations. It should be amended to confirm the partial review would be in relation to the "phasing of housing land supply provisions" and not the principle of allocations.</p> <p>3.20 Subject to the above amendment, we support the Council's approach to the former Manston Airport site, including its recognition that the use of the site can be revisited as part of the next Local Plan review, following the outcome of the DCO. The current approach, subject to the proposed amendment, will be justified and positively prepared, meeting future growth requirements without the uncertainty of delivery on the former Manston Airport site.</p>		1379		Web
Pye	John	194			Object	<p>I want to see Manston Airport kept as an airport.</p> <p>The policies EC4 and SP05 should be kept in the local plan</p> <p>Manston Airport should be removed from Thanet District Council Brown Field Register.</p>		554		Web
Ransom	Natasha	190	British Horse Society		Object	<p>There is no transport strategy for the likelihood of a cargo hub including large freight traffic. Whilst I understand that the Council believes the DCO may not be successful, there should be provision in place for both scenarios. I am deeply concerned about the future of bridleway TR8 which runs alongside this site.</p>	The council should seek to produce Either/Or strategies which cover both scenarios. This is particularly important for the transport infrastructure plans.	570		Web
Read	Chris	344	South Thanet Constituency Labour Party		Object	<p>The South Thanet Labour Party has carefully considered the evidence for the re-opening of the former Manston Airport for commercial aviation as well as the alternative proposal by the site owners SHP for mixed use housing and employment uses.</p> <p>We oppose the reopening of the disused airport as an international 24/7 cargo hub because of the serious adverse health, educational, economic and environmental impacts this would have on the area and the opportunity that would be lost for the site to make a substantial contribution to the long-term housing and economic needs of the district.</p> <p>Having critically appraised the application by RiverOak Strategic Partners (RSP) for a Development Consent Order (DCO), we are concerned at the scale and significant adverse impact on Ramsgate that their plans involve. Their application outlines an unacceptable</p>		1029	Airport studies.jpg (75 KB)	Web

					<p>number of flights 24 hours a day including night time over the town of Ramsgate at low altitude.</p> <p>We would draw the Inspectors' attention to the previous independent expert report commissioned by TDC from Avia Solutions, in order to satisfy the requirements of the National Planning Policy Framework (NPPF), which concluded that any proposal to operate a cargo hub on this site would not be viable within and beyond the 2031 time horizon of the Local Plan.</p> <p>The Council has chosen to disregard this independent expert advice and not allocate the airport site for any specific purpose in the draft Local Plan as they wish to allow the DCO application by RSP to be examined. This decision is not based on evidence and continues to prevent the speedy use of the site for regeneration purposes outlined by the owners. The council is also ignoring three other independent and expert aviation views, as expressed by Falcon Consultancy, York Aviation and Altitude Aviation Advisory, which have advised of the lack of viability Manston has as a commercial airport.</p> <p>The council appears instead to be preparing its Local Plan with regard to an application from RSP that relies solely on a business case put together by Azimuth who have been heavily criticised by Avia Solutions, York Aviation and Altitude Aviation Advisory. We consider that the burden of evidence in front of the council is such that the Manston site should be designated for mixed use development. We strongly support the designation of the site for mixed housing and employment uses especially having regard for the scale of new house building needed to meet the assessed need and the need to provide a wide range of employment uses within the District for the Plan period and beyond. We are concerned about the use of tankers and the increase in traffic that will be inevitable given the need to bring in fuel. The need to use haulage to distribute incoming freight. This will create additional pollution and heavy road use.</p> <p>The disused Manston Airport site is the largest Brownfield Site in the District.</p> <p>Chapter 11 of the National Planning Policy Framework (NPPF) July 2018 (Making Effective use of Land) requires local planning authorities to give priority to previously developed (brownfield) sites when making provision for assessed housing needs.</p> <p>Para117 of the NPPF states that: "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or brownfield land."</p> <p>By failing to designate this site for mixed use development housing and employment uses TDC have failed to comply with the requirements of the NPPF relating to the tests of "soundness" set out in Paragraph 35 Examining Plans. This states that Plans are "sound" only if they are:</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework. For these reasons we oppose the designation of this area for aviation uses and strongly support the development of the site for residential and business uses.</p>				
--	--	--	--	--	--	--	--	--	--

Repsch	John	126			Observation	This site could become a major tourist attraction if days in the summer were set aside for Manston-at-War aerial dogfight displays, etc. Modern Manston could go hand-in-hand with historical Manston.		399		Web
Roberts	Jane	233			Object	I cannot understand why the Council, in the face of several published reports on the non-viability of Manston as an airport, is willing to wait upon the possibility of a DCO going through. In spite of all evidence to the contrary, the Council is not condemning RSP's ludicrous plan. At least the last leader of the Council was man enough to admit an airport is not viable. The legal owners of the site are planning on building houses, a swimming pool, a 'Discovery Park'-like area and keeping the Spitfire museum. The houses built here will not have to be built on greenfield sites around the rest of Thanet.	Allow the legal owners of the site to continue with their plans	712		Web
Rogers	Cathy	245			Object	As a resident of Ramsgate and someone who has chosen Ramsgate as my home to live and work, I can't understand why the current administration at TDC would support the possibility of a future air cargo freight hub at Manston. If such a proposal was accepted by PINs (as put forward by RSP) a development of this scale with day flights, let alone night flights, would undermine and destroy all the great things that this plan puts forward for Thanet in the section of Jobs and Growth, particularly Ramsgate and Herne Bay, areas which this proposed air cargo freight hub would destroy on all counts (listed below). I have read the consultation documents that RSP have published on their website and understand from that night flights from 17,000 (min) ATM per year have been proposed as the operation as a day time only passenger hub is not financially viable, as you state above. In Chapter 1 - Jobs and Growth this plan mentions a will to adhere to the NPPF including: a) inclusion of increasing tourism; b) supporting our town centres to become thriving hubs for visitors, business and the local community, c) to avoid the protection of sites allocated for employment where no reasonable prospects can be realised; d) supporting the homeworker as large number of people work from home in Thanet and its rural areas contributing to employment figures, especially those in the creative industries which is currently driving tourism in Thanet; e) providing jobs outside of the warehouse which currently provides 30% of employment in Thanet, instead focusing on providing a range of jobs. Just on jobs alone, Manston cargo air freight hub only proposes up to 450 jobs for LOCAL people within 7-10 years, and these will mainly be warehouse jobs, hardly a suitable proportion for a project of this size. Setting aside this area for a air cargo operation, as this plan ultimately does directly contradicts what the NPPF requires as stated in section 1 (d) above (paraphrased from your section on jobs and growth. This is a project that will never be realised in terms of meeting the number of jobs required. By even accommodating the notion of a cargo air freight hub at Manston this statement about Manston and RSPs proposal undermines all the admirable things that have been mentioned in Jobs and Growth, it's completely contradictory. I haven't yet read this plans for statement for the environment and green space because reading this I know there is nothing you can say in those sections that aren't also undermined dramatically by inclusion of the support of Manston as an air cargo freight hub. A mere inclusion of Manston as an air freight hub in this plan will surely bring devastation to 40,000 residents health and wellbeing, our natural environment and quality of life for us and those that visit from pollution and noise - which even RSP state in their proposal.	Take out the designation of Manston being set aside a Airport use only and support a proposal that brings about more green space, the housing we need, sustainable jobs that don't destroy our communities lives, health, wellbeing and prosperity. Support a proposal that aims to protect and nurture our special environment that we have in Thanet, wildlife and sealife and our growing economy in the creative industries, science, technology, natural resources, rural economy, micro and sme's and tourism.	750		Web
Roper	Trevor	277	Mr		Object	I object to the policy on the Manston Airport site as being unsound as it is not based on evidence. As an airport with three companies attempting to make a profit over a period of around 15 years, all have failed. RiverOak in various guises have attempted to join with both Labour and UKIP administrations in a CPO - both rejected RiverOak proposals as being unsound. There have been six reports by aviation experts who all claim that Manston as an airport is		820		Web

					<p>unviable.</p> <p>Despite claims by Sir Roger Gale that there are brown field sites available for the 2,500 houses allocated for the site by SHP and the previous UKIP Draft Plan, it is now been proposed that they be built on surrounding green field land which is better suited for agriculture. This without the infrastructure to support them.</p> <p>The plans by SHP include leisure facilities, a business park, schools, shops, a GP surgery and a Heritage Airfield.</p> <p>The RSP plans are deeply flawed, with a lack of rigour and little regard for the local community who would be most effected by a Cargo Hub Airport. They have been particularly disingenuous with regards to Night Flights, claiming not to be planning for any, but their documentation tells a different story.</p> <p>If by some chance RSP were to gain a DCO they would win over a planning application.</p> <p>For the above reasons I urge TDC to reconsider their approach to the Manston Airport site and grant it mixed use status.</p>				
Rose	Phil	248			<p>Object</p> <p>An important element of TDC Local Plan to 2031 as submitted to the Council on 18th January 2018 fails the Soundness test. It has not been “positively prepared” in that it explicitly overturns the “objectively assessed development and infrastructure requirements” as provided by the Council’s own officers.</p> <p>Anyone collating the Local Plan comments will be unsurprised to read that the offending element relates to the disused airfield at Manston.</p> <p>The Council’s officers produced a “Sound” Draft Local Plan after years of hard work and contributions from independent experts (relevant in this instance are Avia Solutions, Falcon Consultancy and York Aviation). The Council’s officers had strong evidence-based advice that the site was extremely unlikely ever to be viable as an airport and ear-marked the unique brownfield site for strategic housing, in the form of a sustainable new settlement. The Draft Local Plan said:</p> <p>“Based on SA assessment, option NS5 (the former airport site) was deemed the most likely opportunity to provide a sustainable new settlement due to its size, which would allow comprehensive provision of uses and facilities, and its unique status amongst options as a brownfield site.”</p> <p>“The SA concluded that the former airfield would be ‘the most sustainable site’ for development as a strategic housing site.”</p> <p>On 18th January 2018, the Council overturned their own officers’ advice, and:</p> <p>“... considered that the allocation of the site as a new settlement would not be appropriate if it might jeopardise any future aviation use.”</p> <p>There is no independent expert advice that suggests that the site is capable of being redeveloped as a viable airport.</p> <p>An evidence-based recommendation has been replaced with a contradictory and evidence-free recommendation. Clearly, this is not part of “a strategy that seeks to meet objectively assessed development and infrastructure requirements”, and thus it fails the Soundness test.</p>	Revert to the Officers' original recommendations.	760		Web
samme	terence	140			<p>Support</p> <p>All future uses for the airport site should be investigated thoroughly, allowing sufficient time (years) for all possibilities to be considered, There is no immediate need for more housing in the area to be built on this site, Once that happens there will be no possibility of its use as an airport in the future, at a time when both Heathrow and Gatwick are struggling to expand.</p>		347		Web
Schembri	Angela	387	RPS Planning & Development Ltd		<p>Object</p> <p>RSP strongly welcomes the decision of TDC to no longer allocate land at Manston Airport for a mixed-use settlement (paragraphs 1.38 to 1.45). However, there should be a strategic policy covering this site and this policy should continue to safeguard land at Manston Airport for aviation uses. As such, this policy would be a continuation of saved Policy EC4 in the adopted Thanet Local Plan (2006).</p>		1139		Email

					<p>A policy safeguarding Manston Airport for aviation uses will be entirely consistent with the Government's Aviation Policy Framework (2013); the Airports NPS (June 2018) and the NPPF all of which fully recognises the major contribution made by the aviation sector to the national economy. This was confirmed by the Planning Inspector in his July 2017 decision on the Lothian Shelf Limited appeals which proposed non-aviation uses at Manston Airport (reference APP/Z2260/W/15/3140995). The Inspector concluded that significant weight should be attached to planning policies that protect the airport for aviation uses because they are consistent with national policy. The Inspector made the specific point that closure of the airport should not mean that less weight should be attached to these policies. The Inspector further concluded that there needed to be a continued application of policy which safeguarded the airport of aviation uses to prevent it from becoming anything other than an airport. Consequently, and as it is the Council's objective to prevent Manston Airport from becoming anything other than an airport, there needs to be a policy in the new Local Plan which safeguards the site for this purpose. The site will be left vulnerable to development proposals if no safeguarding policy is included. In accordance with paragraph 16(d) of the NPPF, a policy would make things perfectly clear for how TDC and others as decision makers should react to development proposals.</p> <p>The evidence base that TDC claim prevents them from including a clear strategic policy that safeguards land at Manston Airport for aviation uses, namely the Avia Solutions Report (September 2016 and related update reports) is not adequate, up-to-date, relevant or reflective of market signals (paragraph 31 of the NPPF) for the reasons as set out in RSP's representations to the Proposed Revisions to the draft Thanet Local Plan (Preferred Options) January 2017 (our letter dated 17th March 2017). Consequently, the evidence from Avia Solutions Limited should not be relied upon in the preparation of the new Local Plan. The evidence that has been submitted by RSP as part of the Manston Airport DCO application, namely the Azimuth Report (Volumes I to IV) (July 2018)¹ is a more reliable evidence base which demonstrates that aviation uses at Manston Airport are viable in the future. This evidence will be tested at the Examination of the DCO application in 2019. The Secretary of State and the Inspector appointed to examine the new Thanet Local Plan are invited to consider this evidence in support of RSP's recommendation to introduce a new policy which safeguards the Manston Airport site for aviation uses.</p> <p>The Azimuth Report concludes that there is a national and regional need to protect the Manston Airport site because it is crucial and required transport infrastructure and because an airport at Manston is viable. Consequently, and in accordance with paragraph 104(c) of the NPPF, the site should be protected by policy/policies in the draft Local Plan. Paragraphs 104 (e) and (f) of the NPPF further state that planning policies should provide for any largescale transport facilities that need to be located in the area (including airports) and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so, the NPPF further advises that policies should take into account whether such development is likely to be a nationally significant infrastructure project (NSIP) and any relevant national policy statements (NPS). In accepting the Manston Airport DCO, PINS have accepted that RSP's proposals for development are nationally significant infrastructure and the Airports NPS (June 2018) is fully supportive of airports making best use of their existing runways (paragraph 1.39). The Inspector should be made aware that TDC Councillors were not afforded an opportunity to properly scrutinise the process for commissioning the Avia Solutions Limited report in the first place, or the evidence itself and its viability and credibility prior</p>				
--	--	--	--	--	--	--	--	--	--

					<p>to this evidence being ‘adopted’ for use in the preparation of the new Local Plan. Despite having been published in September 2016, the Avia Solutions Report was not presented by TDC at the Public Inquiry that considered the Lothian Shelf Limited appeals in March 2017. It was not therefore tested by the Inspector at this time. Conversely, the RSP airport viability evidence in the form of the Azimuth Report was made available to the Inspector who duly considered it when making his decision to dismiss all four planning appeals. The Azimuth Report was not challenged during the Public Inquiry despite there being an obvious opportunity to do so by TDC and others.</p> <p>The draft Local Plan states that in the event that a DCO process is not granted, or does not proceed at Manston Airport, that the Council will consider the best use for the site as part of the next Local Plan, but only after a minimum of two years following adoption of this new Local Plan. This approach is fully supported by RSP.</p> <p>In light of the above, a new policy should be included in the new Local Plan which safeguards land within the Manston airport boundary for aviation uses only until such time that a decision on the Manston Airport DCO prompts a review of the Local Plan. The policy wording could be as follows:</p> <p>“The area shown on the Policies Map as Manston Airport should be retained and protected as an airport and for related aviation uses. Non-aviation uses will not be permitted within this area. Permission will be granted for the further development of the airport and for related aviation buildings and uses provided satisfactory safeguards are in place to mitigate the impact of the operation of the airport on the environment including noise, air quality, flooding, surface access, visual impact and climate change.”</p> <p>In terms of Manston Airport, there is no agreement between TDC and DDC. Furthermore, there is no robust evidence to demonstrate that TDC has engaged sufficiently with county councils, neighbouring authorities, Local Enterprise Partnerships and their local communities to address this strategic matter in their Plan as recommended in paragraph 25 of the NPPF.</p>				
Scott	Ian	29		Object	<p>We have read the local plan & have to say it will be a disaster for Thanet. Manston is the biggest brown field site in Kent and yet councillors are happy to displace housing that could go there onto every greenfield site in Thanet. SHP plan infrastructure that just will not happen with the piecemeal development proposed in the local plan. KCC also had road improvements in the pipeline to ease traffic problems around Hain Rd & Westwood Cross. It seems these will no longer happen as Manston was included in them. By councillors own admission the EC4 status could no longer be retained as there is absolutely no evidence to support an airport will ever be viable. In fact 6 reports from aviation experts say it will never be an economic proposition. Experience of three separate failed attempts at running it as an airport should be enough especially when the money it has cost local ratepayers is taken into consideration.. In spite of all the evidence you have a moratorium on development at Manston in case either RSPs DCO is successful or another interested party comes along who wishes to reopen the airport. For one thing a DCO would override the local plan and secondly in spite of TDC trying no one showed any interest. It is very difficult to understand councillors reasoning on this. It seems to have been done more to manipulate the land value in favour of RSP to the detriment of the legal owners. We have to say this is a disgrace. The council is here to look after the best interests of local residents not RSP. RSP is private company who's investors are shrouded in secrecy in a shell company based in Belize. In its previous incarnations it has failed twice to prove to TDC it had the funds or business plan to develop the site and was unable to put any money in escrow at the request of TDC. Looking at the DCO application nothing has changed. SHP have put forward a planning application that will include much needed housing & infrastructure and is viable. This is a planning application that will</p>	TDC should reconsider re including Manston airport for housing now & have no deferment then they can deal with SHPs planning application fairly	50		Web

						improve Thanet not blight it but due to this proposed local plan it seems it will automatically be refused without due consideration. TDC should rethink this plan !!				
Scott	Hilary	213	Mrs		Object	The local plan as proposed is unsound. Setting aside Manston for 2 years is going against officer's advice. Councillors are trying to manipulate the land value in favour of RSP a private company. It is not their place to do this. All the evidence that TDC have says that Manston will never was and will never be viable as an airport and this should be the basis of any decision on its future. Councillors should work for the people they represent not their own personal agendas and privately owned companies. RSP is a shell company whose investors are shrouded in secrecy in Belize. By their own admission they do not have the funds necessary to complete such a project. At least with the planning application for the site now with TDC there would be infrastructure & road improvements. The result of this fiasco of a plan means that many greenfield sites will see piecemeal development with no infrastructure whatsoever. Also with this 2 year moratorium on development will SHP's planning application be turned down without due consideration. I can see legal battle that will cost TDC, and us as ratepayers millions in legal fees and compensation. I doubt very much this plan will pass government scrutiny and I suspect the net result of this will be HMG taking over planning in Thanet and result in even more houses being built. All in all TDC councillors are leaving residents open to a massive blight and a large legal & compensation bill	Change Manston back to mixed used as recommended by TDC officers and remove greenfield sites from the plan. Take officers advice	646		Web
Shapland	Greg	256			Support	To insist on keeping open the option of using Manston solely for aviation is to reject the evidence provided by experience (no operator has been able to make Manston successful as an airport) and objective studies (which have shown that aviation-only use is not viable). Moreover, keeping the aviation-only option open means further delay in achieving the Council's other goals. There is an urgent need for more housing in Thanet and Manston is the largest available reservoir of brownfield land that we have. A mixed-use approach would therefore be the best option.	The document is unsound in respect of the Manston site, given that it continues to focus on the option of aviation-only use, despite the existence of evidence (quoted in the document) that this is not a viable use of the site.	783		Web
Shapland	Leonor a	263			Object	Re Manston Airport. I think the plan to build an airport at Manston is a bad idea. The noise and pollution of aircraft will affect the health and wellbeing of the local inhabitants. Also, for the towns that rely on the tourist industry, it would be injurious. Who wants to have their sleep disrupted on holiday? Security. Who will police the perimeter fence? Armed police in case of terrorist attacks? It's a soft target. Who will pay for the security? Council tax payers ?	The document is not sound in respect of the Manston site, as the report commissioned by the Council shows that an airport would not be viable here. Despite this, the Local Plan insists on protecting the aviation-only option. So I suggest changing the Plan to reflect the conclusions of this report and so remove the aviation-only option.	798		Web
Shonk	Trevor	93	Ramsgate Town Council		Observation	(Statement of need,) needed houses, unaffordable (Doctors) (Hospitals) (Dentist) (Infrastructure), ROADS 106 agreements are I see are open bribe Save our farmland. The best agriculture grade one. Greenbelt. Government imposed housing. Cliffsend. No way to Parkway Station up grade the North Kent Line. Don't spend £21 million use it on town areas re King St. High St M/Gate Manston Green./ land banking) – smother of the best agricultural land statement of need. As I said before Manston Airport kept as a regional airport, its an asset. Government has got it wrong again As I long standing local resident my concerns are as stated, food before (concrete) This best agricultural land in (Thanet) and the pressure is on all of Thanet B/Ton/Westwood X, Broadstair, Westgate when we have thousands of empty properties land banking etc. old industrial sites KCC to much influence on and around Thanet.		213		Paper

						My thoughts only.				
Simpson	Marlene	286			Object	<p>For Thanet employment opportunities need to be created and the only way that businesses can be attracted here so as to have that to happen is for Manston Airport to be given every opportunity to become fully operational again since airports anywhere attract employment. And it is employment that Thanet needs above any additional housing. Riveroak Strategic Partners (RSP) currently have a DCO submitted which has been accepted and will now follow the prescribed route as laid down in law. Steps with TDC had been taken to totally do away with the designations EC2 and EC4 of the existing albeit lapsed Local Plan but council has decided upon a convoluted improvement to that. However I still believe the existing policies regarding the airport and SP05 should still be retained going forward as to ensure Manston Airport is retained for aviation use only. The facility is there. Any other use for it would be limited by the fact that it would cost too much to try and remove the existing runway and we would be burdened by a vast long open space forever which eventually no one would maintain. Manston Airport should be removed from the TDC Brown Field Register so as to ensure its proper use is maintained. Once we lose the airport it could never ever be recovered again if needed.</p>	Retain existing policies in the new Local Plan, eg EC2, EC4 and SP05. Manston Airport should also be removed from the TDC Brown Field Register	834		Web
Simpson	Marlene	286			Object	<p>For Thanet employment opportunities need to be created and the only way that businesses can be attracted here so as to have that to happen is for Manston Airport to be given every opportunity to become fully operational again since airports anywhere attract employment. And it is employment that Thanet needs above any additional housing. Riveroak Strategic Partners (RSP) currently have a DCO submitted which has been accepted and will now follow the prescribed route as laid down in law. Steps with TDC had been taken to totally do away with the designations EC2 and EC4 of the existing albeit lapsed Local Plan but council has decided upon a convoluted improvement to that. However I still believe the existing policies regarding the airport and SP05 should still be retained going forward as to ensure Manston Airport is retained for aviation use only. The facility is there. Any other use for it would be limited by the fact that it would cost too much to try and remove the existing runway and we would be burdened by a vast long open space forever which eventually no one would maintain</p>	Retain existing policies in the new Local Plan, eg EC2, EC4 and SP05	838		Web
Skerratt	Michael	254			Object	<p>To whom it may concern.</p> <p>I would like to see policies SP05 (Manston Airport site) and EC4 (Airside development area) retained within the local plan, rather than their proposed removal and replacement. In support of the retention of Manston Airport status then Manston Airport must also be removed from the TDC brown field register.</p> <p>As a Thanet resident of some twenty years, I want to see Manston airport retained and reopened as an airport rather than any alternative use.</p> <p>A number of local councillors were elected by local people on the basis of their commitment to re-opening Manston as an airport, and to represent the views of the majority of local people who support the re-opening of the airport. Local councillors should honour that commitment, not turn face once elected, and continue to represent and take forward the views of the majority of the local population. Thanet council and her officers should be supporting the local members of parliament, not opposing them, in their commitment to maintaining and developing Manston airport as an airfield.</p> <p>Manston Airport is a vital piece of national infrastructure that, once lost, can never be re-instated. The process to acquire and re-open the airport through a Development Consent Order is now under way and it would be wrong to re-designate the airfield for alternative use in an attempt to frustrate this proposal. Manston airport is recognised by local people and nationally as an asset as an airfield, not as anything else, and the local council and her officers should also recognise and support this.</p> <p>With an investment and improvement in high-speed rail links to the airport via a Thanet Parkway station, then Manston airport would be significantly more attractive as a viable</p>		769		Web

					<p>alternative to LGW and LHR for either freight or passenger flights. The idea of a rail link to Manston airport is not a new idea and has been established for over twenty years ever since I moved to Thanet. I consider this a missed opportunity, which should have been implemented many years ago, and may have had a considerable bearing on the viability of the airport which we're now facing. The opportunity to reach the centre of London within 1 hour is highly significant both for airport passengers and commuters, and has a significant bearing on the sustainability of Manston airport as a passenger terminal. In this day and age, even with the current high speed trains it still takes too long to get to London from Thanet by train. At present the county council should consider the main reason for Thanet Parkway station as to service Manston Airport and not anything else, but that is outside of this local plan consultation.</p> <p>If the UK is going to be able to create new markets post- Brexit outside Europe then goods inward and outbound are going to have to travel a great deal further and largely by air. There will still be a significant market within Europe too, which will remain important to the UK for export but also to the EU for importing and sale of their goods to the UK. Without Manston Airport, Britain and particularly the South East will struggle to handle the traffic, which will be vital for our country's prosperity and growth now and in the future. It will be fifteen years at least before any new runway at LHR or LGW is up and running. Despite the economic forecasts and benefits of further capacity at either, currently there is limited capacity either for additional air freight or the predicted rise in passenger demand, and considerable local objection to further expansion at either site. It seems absurd to me that here we have a perfectly good airport at Manston, certainly capable of taking significant air freight traffic, which could meet an immediate need and quickly relieve pressure on LHR and LGW and free up passenger capacity there, but is being ignored and considered for primarily a housing development. With investment in the transport infrastructure, which should have been done years ago with some forward thinking and planning, then there is real potential to develop Manston airport as a freight hub and possibly for passengers too. How much heavy goods traffic do we see passing through Dover and Folkestone to and from the continent, which should indicate with improved road links the viability of Manston airport for freight.</p> <p>Thanet suffers from high levels of unemployment and social deprivation, with some of the lowest levels of household income in the south-east, and associated reduction in healthcare outcomes for the local population. I believe that we need to retain Manston as an operational airport, which with appropriate investment and development, would support significant expansion of additional local businesses around the airport site, either directly supporting the airport business or as potential customers resulting from the excellent transport links.</p> <p>This would provide much needed employment, as well as the opportunity to develop skills in technical, scientific and hospitality areas, where there are already nationally-recognised skills shortages. This could tie in with government apprentice schemes and local education providers. It would be short-sighted of the local council to allow redevelopment of the airfield for alternative uses, and a long-term view should be taken for the future of generations to come. It is becoming clearer that any redevelopment of the airfield for alternative uses will be focused primarily on residential development, with very little long term business development or additional employment opportunities. I have seen no firm evidence of the latter, despite the proposals, and would consider the employment prospects of the airport and related business as far greater than any redevelopment for alternative use.</p> <p>Yours faithfully</p>				
Smith	Stuart	297		Object	Existing policy EC4 and SP05 should be retained in view of the current shortage of runway space in the South East.		867		Web

						Policy SP45 is no longer relevant. The current pattern of HS rail services in Thanet and neighbouring Districts removes the original reason for a parkway station.				
Smith	Samantha	393			Object	I strongly object to various sections of this Local Plan - mainly I object to saving Manston for Aviation only, that site ceased being an airport over four years ago. My understanding is that Councillors went against Officers advice on this matter, I also understand that a Local Plan has to be evidence based. If this is allowed to continue we will have houses built on various Greenfield sites when the majority could be built on Manston which includes infrastructure, smaller developments will not provide the infrastructure. The current owners have put forward a planning application that will include much needed housing & infrastructure and is viable.		1155		Email
Snow	Tony	321			Support	I strongly support the revised local plan inclusion to re-instate Manston as a working commercial airport. It can only be good for the future employment prospects of the Isle of Thanet.		977		Paper
Snow	Patricia	349			Support	4.13/4.14 - The current lawful use for this site is for aviation. It is a site that is generally free of fog and obstructions and a perfect opportunity to revitalize East Kent. It will provide job opportunities and boost our new trade deals. This site must utilize its full potential to improve the whole area in the future. Houses can follow as can be seen near existing airports in other parts of the UK.		1041		Paper
Solly	C	419			Object	Policy SP05 has been deleted and a statement has been made from 1.38 to 1.45 in the local plan. It should be noted that the option which council voted for on the 19th July 2018 was deemed unsound and against the officers recommendation. [Comments attached below for formatting reasons]		1195	Solly Manston Airport comments.pdf (976 KB)	Email
Stevens	Angela	163			Object	The Avia Report was NOT peer-tested. Avia stated (and RSP confirmed this at the Public Inquiry) that it had met with RiverOak Strategic Partners (RSP), but hadn't included any of their considerations in their report. They wouldn't sign the confidentiality clause, so the full RSP plans weren't revealed. Avia also stated that their report should NOT be used in any planning decisions, but TDC are relying wholly on this flawed and untested report! RSP have had their DCO Application accepted by the Secretary of State via PINS. This is not mentioned above. Policies SP05 and EC4 were taken out of the emerging Local Plan by officers, which sadly wasn't noticed by the current Leader, until too late. These policies are essential to protect the airport, which has recently been deemed an NSIP by PINS, but these essential policies have been removed by TDC officers, as they seem to prefer housing on that valuable asset. The airport is desperately needed for jobs, as Thanet is a seriously deprived area. This statement above, "The report concluded that airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the period to 2031" is based on the airport as it is now, with only 2 stands. RSP plan to have 19 cargo stands, relieving Heathrow and Gatwick, as well as 4 new passenger stands. This will provide a very viable working airport for the Thanet, East Kent and the UK. Sadly, RSP's plans seem to be continually disregarded by TDC officers.	Reinstate Policies SP05 and EC4. Cooperate positively and constructively with RSP, as do other local councils, all of whom support the reopening of Manston Airport. State that "in its present form the airport is unlikely to be viable, but with the addition of 23 new stands and the construction of a brand new, state of the art airport, Manston Airport has the capability to become the jewel in the crown of Thanet and the whole of Kent and beyond." TDC used to sing Manston's praises - and protected it in its current 2006 Local Plan, until it was sold in 2014...	487		Web
Stevens	David	175			Object	Manston Airport – the revision and removal of revised policy SP05 I am writing to object to the omission of a revised policy SP05. Officers of TDC told elected members that they could not include a revised Policy SP05, which safeguarded Manston for aviation use only (based on saved Policy EC4) because Policies have to be evidence based. Although this seems plausible I would assert that a) there is sufficient evidence to justify safeguarding land for specific employment use (aviation) b) there is insufficient evidence to justify changing the use of Manston from its present designation.	As stated above Policy SP05 must be included in the Local Plan to safeguard the Manston Airport site for aviation use only.	528		Web

					<p>Initially Policy SP05, which was to replace saved Policy EC4, was revised to allow for mixed use on the Manston Airport site rather than retaining the site for aviation use only. There were a number of reasons given which included reference to the National Planning Policy Framework (NPPF), which states “planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose”. There is then mention of the Avia report as justification for changing the policy away from aviation only.</p> <p>There are two major flaws in this strategy:</p> <p>RiverOak Strategic Partners DCO Application has been submitted and accepted for examination by the Planning Inspectorate so it is incorrect to assume there is “no reasonable prospect of a site being used for that purpose”. This purpose is Aviation as specified in saved policy EC4. This point was covered in great detail by the QC, Suzanne Ornsby for RSP in her cross-examination of Mr Alston who is the SHP planning “expert”. Taken with the evidence given by Dr Sally Dixon of Azimuth, Mr George Yerrall of RSP and Mr Chris Cain, Associate Director of Northpoint Aviation Consultancy and Angela Schembri at the Planning Inquiry, it provides a compelling case that there is “a reasonable prospect of the site being used for that purpose {Aviation}”. In his report the Planning Inspector, Mr Nunn made it clear that saved Policy EC4 was consistent with the NPPF and national aviation policy. If this is the case then Policy SP05 should reflect saved policy EC4 in retaining the site for aviation only so that NO alternative uses can be contemplated.</p> <p>The Avia report is being used as “evidence” but it is not evidence it is just an opinion and has been shown to be unreliable by Chris Cain of Northpoint Aviation Consultancy at the recent Planning Inquiry. He pointed out that the Avia report:</p> <ol style="list-style-type: none"> 1. Excluded the RiverOak business plan because Avia would not or could not sign a non-disclosure agreement. When the RiverOak plans are run through the Avia model it shows that the airport is viable. 2. Was based on an out of date growth rate of 1% when it should be nearer to 3.7%. 3. Worked on a modest investment of £77 million when RSP are looking to invest up to £500 million. 4. Assumed that cargo tonnage would remain static at 30,000 tons when two experts working independently using different models project figures of between 220,000 to 230,000 tons per annum. 5. Uses the assumption that belly hold capacity will be able to take up all the demand, which is simply not the case. 6. Ignored the income and jobs generated from general aviation activities, which is worth between 20-25% of a smaller airport’s total revenue. 7. Ignored the plans for maintenance, repair and tear down which will generate substantial income as well as providing skilled jobs. 8. Focused primarily on passenger not freight which is the basis of the RSP plan. 9. Stated that Manston was in the wrong place but the key to freight operations is trucking time and Manston is within three to three and a half hours of most of the South East. <p>It should also be noted that there has been no viability study done on the suitability of Manston for a housing development. Indeed, there are significant indications that the site is totally unsuitable for housing.</p> <p>In the SHP application, OL TH 16 0550, with regard to the Environmental Issues, it identified a number of possible contaminants and these are listed in table 13.10 on page 13-21 of the Environmental Statement Volume 1 (ESV1).</p> <p>However, this was a desk exercise and:</p> <p>“..... no ground investigation has been completed on site” (13.9.3 ESV1)</p>				
--	--	--	--	--	--	--	--	--	--

					<p>Indeed SHP appear to have no intention of carrying out a ground investigation unless they are granted planning permission:</p> <p>“The ground investigation should be completed post consent in response to planning conditions in line with the scoping Report and Scoping Response” (13.7.10 ESV1). However, this contradicts advice given by Natural England and the Environment Agency as part of the statutory consultation process. In a response sent to Iain Livingstone 24/2/16 and included in Environment Statement Volume 2 (ESV2), Natural England state that:</p> <p>“Case law¹ and guidance² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission.”</p> <p>¹ Harrison, J in R. v. Cornwall County Council ex parte Hardy (2001)</p> <p>² Note on Environmental Impact Assessment Directive for Local Planning Authorities Office of the Deputy Prime Minister (April 2004) available from http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/noteevironmental/</p> <p>The Environment Agency state in a letter to Iain Livingstone 4/2/16 and included in ESV2: “Contamination - The former Manston Airport overlies chalk which is classified as a principal aquifer. The site lies in Source Protection Zone 1, 2 and 3 for a public water supply well. The well used to pump the water out of the ground is located very close to the boundary of the site. From this well, tunnels known as adits have been constructed to increase the flow of water to the well.</p> <p>One of these adits lies underneath the former runway on the site at approximately 35-40 metres below ground level. Groundwater on the Isle of Thanet is extremely vulnerable to contamination as substances (natural substances and man-made chemicals) are able to pass rapidly through the thin soils and the natural fissures (cracks) in the Chalk rock to the groundwater. We note that a Phase 1 Environmental Desk Study (PRA) is to be prepared. Given the former land use(s), sensitivity of Thanet’s groundwater resource and the need to ensure no derogation to supply, this must be comprehensive and carried out in sufficient detail to be able to advise you whether the site can safely be developed based on the risk assessment findings. The risk assessment would need to include adequate site investigation, information to fully understand the site wide status and potential for deeper contamination and potential impacts on groundwater quality locally. This is in line with the NPPF, which advises that sufficient information on contamination must be available to allow the local planning authority to make an informed decision on the proposals.</p> <p>This issue is also a concern to the TDC Environmental Protection Officer, Morgan Sproates, who states that:</p> <p>“The PRA (Preliminary Risk Assessment) report considers the risk to Human Health as Medium to High and the risk to Controlled Water as High in the context of a mixed-use development.”</p> <p>He goes on to insist that:</p> <p>“An intrusive investigation and updated Risk Assessment shall be undertaken by competent persons ”</p> <p>Surely this must be carried out before Manston Airport could even be considered for housing.</p> <p>Southern Water has concerns with the proposed mixed use development.</p> <p>“Our initial investigations indicate that there are no public surface water sewers in the area to serve this development. Alternative means of draining surface water from this development are required. This should not involve disposal to a public foul sewer.</p> <p>The proposed surface water drainage strategy is not acceptable to Southern Water.”</p>				
--	--	--	--	--	---	--	--	--	--

					<p>It goes on to say: “Following initial investigations, there is currently inadequate capacity in the local network to provide a water supply to service the proposed development.” There are objections to the scheme from the MOD on the grounds that a) part of the plan involves MOD land and they may not give consent and b) the proximity of the proposed development to the Defence Fire Training and Development Centre is a potential problem in terms of air and noise pollution impacting the development. The development also proposes the site for mixed –use with 85,000 m2 of industrial space(B1, B2 & B8). It is debatable whether such a development is justified in light of the number of vacant industrial units and sites within the area. A FOI to TDC identified 115 void (not paying business rates) industrial units out of a total of 888. In a speech on 4th March 2017 held in Westgate, Sir Roger Gale indicated that of the seventeen and a half hectares of land zoned for industrial use in Thanet, research has shown that at least 8 hectares (80,000m2) is not needed for industrial use. If this is the case then there is no justification for an additional 85,000m2 being allocated for industrial use. It is well known that when a new industrial site opens, businesses relocate to take advantage of advantageous business rates. Discovery Park is often referred to as a success but most of the jobs on the site already existed either on site or were relocations. In November 2016 there were 132 firms listed on the Discovery Park web site. Of those, 83 (63%) were either already on site (some with a name change) or relocated to the site. Only 28 (21%) were definitely new businesses. A further 18 have insufficient information to ascertain their status and 3 businesses were dissolved. Certainly the fear that businesses will simply relocate is one that Dover District Council (DDC) has identified in their report on the TDC revised local plan. “Policy SP05 has allocated the former airport site for 85,000sqm of employment and leisure floorspace. No evidence is available on the Local Plan website that justifies this amount of employment and leisure floorspace. An allocation of this scale in a Local Plan should be supported by an Economic Development Needs Assessment (EDNA). If the scale of the development is beyond an EDNA, there needs to be an evaluation of the impact on surrounding District’s. Without the justification for the need for this amount of floorspace Officers consider that a representation is submitted that seeks clarification on this particular point in order to ensure that it would not adversely divert trade out of the District including Discovery Park Enterprise Zone (EZ). In terms of leisure floorspace (which has not been defined separately) DDC would need to be assured that this would not adversely impact the Council’s corporate priority of providing a new leisure centre in Dover.” In light of all of the concerns and objections highlighted above it seems inconceivable that TDC could even consider Manston for this development without all of the requested investigations being completed and then the results of those taken into account in a viability assessment. I would urge the Secretary of State to include Policy SP05 which safeguards the site for aviation use only.</p>				
Swindells	John	203		Observation	<p>Initially I enclose a copy of my letter dated 1st March 2015 outlining my reasons for objecting to just 1000 houses on the prime agricultural land in Westgate on Sea and Garlinge and stressing the importance of MANSTON AIRPORT as an airport. I will now come onto the subject of OUR Airport. It is well known that neither Gatwick or Heathrow have the runway capabilities to handle all of their passenger and freight flights. Whilst the fight continues as to whether one or the other get permission for a new runway, there is an obvious and in real terms, relatively cheap option. Re open Manston Airport. I read a report a few months ago, (which I accept may or may not be true), that stated freight from one of the airports is being driven to European airports for onward</p>		630	052 Swindells John letter 2015.pdf (140 KB)	Paper

						<p>flights. Manston is just two hours away mostly by motorway and dual carriageway. Problem solved. Also, hundreds of new "REAL" jobs would be created for local people. Any new runway will take several years to come into effect. Do the only sensible thing and transfer freight initially and maybe passenger services later to Manston. The immediate benefit would be to free up runways for passenger flights. Also, Manston has been used to handle "emergencies". Such emergencies actually close Gatwick. Although rare, Manston could take those problems away.</p> <p>I love living in Thanet. I do not want it spoiled for no good reason and I fervently want our Airport back, for all the right reasons.</p>				
Sykes	Anthony	31			Support	<p>Airports create jobs. This airport is needed for an integrated transport policy nationally. It seems mad to expand Heathrow or Gatwick when full employment in these areas will resort in a serious shortage of labour. However Thanet has a high unemployment problem so siting an airport again at Manston could solve this problem.</p>	It needs to drive the policy to re-open Manston as a fully functioning airport and ditch the politics.	53		Web
Thompson	Andrew	162	Canterbury City Council		Observation	<p>We recognise also that the draft plan is silent on the Manston Airport site, in order not to prejudice the DCO process. The Council will respond separately as part of the DCO process.</p>		475		Email
Trotter	AR & PJ	388			Observation	<p>MANSTON AIRPORT</p> <p>Manston Airport should be considered a National Asset. No decision should be taken about the redevelopment of the airport until a decision is made by the Government regarding the Development Consent Order application which has recently been submitted by Riveroak for continued aviation at Manston. If the Development Consent Order is refused and it is agreed that 2500 houses are to be built on the airport land then the alternative sites designated at Birchington (600) Westgate(1000) Hartsdown Margate (300) Minster(100) and Westwood (500), should be left as farmland.</p>		1146		Paper
Tuffs	Jo	79			Observation	<p>As the airport viability report has already concluded that airport operations at Manston are very unlikely to be financially viable and almost certainly not possible in the period to 2031, why did the council submit a DCO when this had been concluded. There is a wilful and irresponsible attitude to Manston and woeful lack of vision. The airport will never be viable and in the plans submitted by RiverOak will be an environmental disaster detrimental to Thanet. The preference to build houses on green field sites around Thanet rather than use Manston as a visionary and inspiring new eco town that is self-sufficient is typical of Thanet District Council's lack of ambition.</p>		195		Web
Twizell	Heather	512	Natural England		Observation	<p>Natural England notes that to ensure that the NSIP-DCO process for an air cargo operation as currently being pursued by RiverOak SP is not prejudiced, the Council is proposing not to allocate the Airport site for any specific purpose in the draft Local Plan. We will continue to provide impartial, evidence-based advice on the likely impacts on the natural environment of any development proposals on the site.</p>		1447		Email
Twyman	Paul	324			Object	<p>SP 05 should revert to the original wording.</p> <p>Most of these suggestions stem from the reversal in July by the Council of the well argued and well documented proposals in the originally published version of the draft plan which left open the possibility of alternatives to airport use at the site of the disused aerodrome site at Manston.</p> <p>There is no justification for standing in the way of mixed use development on the site of the now defunct aerodrome which has never been a commercial success and which was the source of a variety of serious environmental problems while the operators were trying to make a go of it.</p> <p>As a result of maintaining the forlorn hope of resurrecting the airport the current proposals are for forcing housing onto green wedges (and the highest quality agricultural</p>		990		Email

						land). This makes a nonsense of planning policies. The Inspector will no doubt note that while the plan at 4.13 states that "a new settlement would not be appropriate if it might jeopardise any future aviation use" and reference is made to a DCO, there is no similar, equivalent reference to the planning application submitted for mixed use - submitted by the people who actually own the site!				
Walker	John	231	The Ramsgate Society		Support	<p>The Ramsgate Society Response to Thanet District Council's Pre-Submission Publication Local Plan Introduction and Summary</p> <p>1.1 The Ramsgate Society, with over 700 members, is the civic society for the town of Ramsgate. Founded in 1964, it is a registered charity and a member of Civic Voice, the national organisation for civic societies in England. The Society's objectives are</p> <ul style="list-style-type: none"> * To encourage high standards of architecture and town planning in Ramsgate; * To stimulate public interest in and care for the beauty, history and character of the town and its surroundings; * To encourage the preservation, development and improvement of general public amenity of historical interest; and * To pursue these ends by means of meetings, exhibitions, lectures, publications, other forms of instruction and publicity, and promotion of schemes of a charitable nature. <p>1.2 The Society welcomes the opportunity to comment on Thanet District Council (TDC)'s Draft Local Plan to 2031.</p> <p>1.3 We believe that, whilst there is much to applaud in some of the more detailed sections of the Plan such as Quality Development, Heritage and Listed Buildings, the Plan overall is flawed in its main strategic framework when dealing with the future of the Manston Airport site and the numbers and allocation of new housing. We also believe that the section dealing with the future of the Harbour, Marina and Port in Ramsgate is inadequate in that it fails to provide an imaginative, comprehensive future development plan which recognises the huge potential for growth in employment and tourism, and an end to the unacceptable annual financial loss, running into millions of pounds, of the Port.</p> <p>Comments on Chapter 1: Economic Strategy; SP05 (Manston Airport Site)</p> <p>The Manston Airport Site</p> <p>2.1 Manston Airport was unprofitable throughout the first fifteen years of this century in its operation as a commercial airport, losing over £100m, and it closed in May 2014 with the loss of 144 jobs. The site was then purchased for £1 in November 2013 by Ann Gloag, co-founder of the Stagecoach transport group. Despite assurances about the future of the airport, it was closed several months later when it was realised that an airport operation would be financially unviable. Shortly afterwards a plan for a large housing and mixed use development was announced, to be delivered in a joint venture with the developers Stone Hill Park (SHP), which had bought the site from Ann Gloag.</p> <p>2.2 Various pro-airport groups petitioned TDC to issue a Compulsory Purchase Order (CPO) to buy the land in order to retain the airport, in conjunction with a private indemnity partner. A United States based investment company, RiverOak, submitted a proposal to reopen the airport for freight cargo and associated aircraft maintenance functions. This plan was considered by TDC but rejected, as it failed to provide a credible business plan and necessary financial information and assurances the Council required to support the request.</p> <p>2.3 TDC then commissioned the independent aviation experts Avia Solutions to advise on the future viability of the airport for freight operations. In June 2016 Avia Solutions concluded that there was little or no chance of the operation being viable within the time scale of the Local Plan (2031).</p> <p>2.4 A separate company, RiverOak Strategic Partners (RSP), commenced consultation in 2016 in preparation for making a Development Consent Order (DCO) application to reopen</p>		703		Web

					<p>the disused airport as a freight cargo hub on a 24/7 basis and compulsorily purchase the land. In May 2016 Stone Hill Park (SHP) submitted an outline planning application for a comprehensive mixed use development on their site including up to 3,700 houses, to be built over a 15-20 year period. This was superseded by a revised and more detailed application by SHP in May 2018 which has yet to be determined.</p> <p>2.5 In August 2018 the Planning Inspectorate announced that the RSP application, which the Society opposed, had been accepted by the Secretary of State as a National Strategic Infrastructure Project (NSIP) and for the DCO to go forward for public examination.</p> <p>2.6 When the Society made its response in March 2017 to TDC’s consultation on Revisions to the Draft Local Plan Preferred Options 2015, it strongly welcomed the re-designation of the Manston site for mixed use development, especially with regard to the scale of new housing to meet the assessed need.</p> <p>2.7 On January 18th 2018 TDC officers submitted the Draft Plan to the Council, including the recommendation that the former Manston airport site be designated for a comprehensive mixed use development to create a sustainable new settlement including 2,500 new homes. However, at the meeting the elected members of the Council voted to reject this recommendation and decided that</p> <p>“the former airport is currently subject to a Development Consent Order application and its current lawful use is for aviation activities. It has since been considered that the allocation of the site as a new settlement would not be appropriate if it might jeopardise any future aviation use.”</p> <p>2.8 TDC’s decision on the airport issue was a political choice: it was not taken on the basis of evidence or reasoned argument; indeed it was taken against the advice of their officers and, as admitted in the Draft Plan, against the findings of Avia Solutions (Commercial Viability of Manston Airport: Final Report, September 2016) which concluded that any proposal to develop and operate a freight cargo hub would not be viable.</p> <p>“We consider the geographical location of Manston precludes it from being a suitable base airport or integrator, in particular when compared to UK competitors such as East Midlands Airport” (para 4.2).</p> <p>2.9 Other published reports such as those by Falcon Consultancy, York Aviation, and Altitude Aviation, and a second Avia Solutions report (Manston Airport: Local Plan Representation, August 2017) have come to similar conclusions, and it is also worth noting that in recent years major air travel companies such as FlyBe (2010-11) and KLM (2012-14) have tried and failed to sustain passenger services from Manston.</p> <p>2.10 The Society believes that the Plan fails to follow the guidance provided by the National Planning Policy Framework (NPPF) issued in 2018 which requires local planning authorities to give priority to previously developed (“brownfield”) sites when making provision for assessed housing needs. The Manston site is by far the largest brownfield site in Thanet and represents a hugely valuable opportunity to undertake a comprehensive development of the site with provision for housing and the necessary associated physical and social infrastructure, including roads, open space, parks, schools, and GP surgeries, all of which are essential for the creation of a new sustainable community.</p> <p>2.11 The Society submitted a full response in June 2018 to SHP’s revised planning application on the SHP planning application, strongly in support of SHP’s proposals. We supported the proposal for much needed housing in accordance with the housing, economic and employment objectives of the emerging Local Plan, and the fact that it was, in accordance with the NPPF guidance, a brownfield site, thereby avoiding the loss of agricultural land and the piecemeal, environmentally and socially unsustainable development of smaller housing sites tagged on to existing communities. We also supported the proposed provision of employment space with the potential to create 3000</p>				
--	--	--	--	--	---	--	--	--	--

					<p>new jobs, particularly in small and medium sized enterprises; the heritage aviation schemes; the 100 hectares of land for recreational uses and the creation of ecologically diverse habitats; and the East Kent Sports Village. We continue to fully support this vision for the future, and SHP's planning application.</p> <p>2.12 It is unfortunate that the two competing proposals by SHP and RSP cannot be considered side by side within a single statutory examination and decision making process. It is not entirely clear how the two applications will be treated in relation to each other: it is unclear, for example, whether any decision has been taken to deal with the RSP and SHP applications sequentially, and there is some uncertainty over how the timescale of each might affect the other. The SHP application has been postponed until December (because of the need for SHP to provide additional information to deal with environmental and transport matters) but with no clear indication whether it will be postponed further to take account of the timetable of the RSP/DCO application (a Pre-Examination period in the last three months of 2018; the Examination period with written representations and hearings in the first eight months or so of 2019; the Report and Recommendations towards the end of 2019; and the Secretary of State's decision likely in the early months of 2020).</p> <p>2.13 It can be argued that the RSP/DCO Examination will indeed provide a formal opportunity for SHP to object to the RSP/DCO proposal, and in doing so will argue, not only that the RSP/DCO proposal is not credible, but that their own proposals are a better way forward. In that sense at least, the two competing proposals would be looked at side by side. However, it is still likely that the RSP/DCO Examination would insist that it was required to consider the RSP/DCO proposal on its own merits within established planning law.</p> <p>2.14 It would seem logical, therefore, that the RSP proposal- because it involves a DCO application and is regarded as a national level planning issue (" a Nationally Significant Infrastructure Project in the Transport Sector")- would take precedence over the SHP local planning application. This means that, whatever the merits (and demerits) of the SHP planning application, they will never be weighed side by side, on a social cost-benefit analysis basis, with the merits (and demerits) of the RSP proposal.</p> <p>2.15 This does not mean that if the DCO is accepted, the SHP application falls, at least not immediately: an appeal or a judicial review might ensue, and the question of compensation due to SHP for the compulsory purchase of its land would still lead to further delay; also, it would be the case that SHP would retain the right to have its application determined.</p> <p>2.16 All of this casts a strange and unfortunate shadow over the Draft Plan: despite the site being the largest and most important site in the District, TDC has not allocated the airport site for any new specific purpose in the Plan because of the DCO application being in play (although the site's previous designation as an airport remains in force), and the key planning and development issue for the area will be determined not by the outcome of the local consultation on the Draft Plan but by the Secretary of State.</p> <p>2.17 The Draft Plan includes the following passage: "In the event that a DCO or CPO process is not accepted or granted, or does not proceed, the Council will need to consider the best use for this site, in the next Local Plan review after a minimum of two years" (emphasis added). We would argue that, in the event of the RSP/DCO proposal not going forward, the Council should waste no further time and should consider the SHP mixed-use development as a matter of urgency: why wait two years?</p> <p>2.18 We believe that TDC's political commitment to the airport cause is misplaced and fails to recognise the scale of the operation proposed by RSP and its harmful impact. The application is for a capacity of at least 12,000 air cargo movements per annum (an average</p>				
--	--	--	--	--	--	--	--	--	--

					<p>of 33 per 24 hours), with Boeing 747 jumbo jets being the dominant type of aircraft in the cargo sector. In reality, however, RSP are actively planning for a much larger number of movements, 17,000 per annum (an average of 47 per 24 hours), namely at least ten times as many as the last full year of operation (2013).</p> <p>2.19 The Society believes that the RSP plans will have an extremely adverse impact on the historic and heritage character of Ramsgate; environmentally, including the adjacent nationally and internationally designated reserves and sites; health-wise, due to noise and air pollution; and economically, due to impacts on potential tourism developments particularly around the unique Royal Harbour and Marina which would be incompatible because of the frequency of large, noisy low-flying aircraft directly over the Harbour.</p> <p>2.20 Furthermore, the plans involve a huge lost opportunity for the Manston site to provide a much wider range of new employment opportunities, new parks and leisure facilities, and the much needed housing numbers which TDC is obliged to provide, and to do so on brownfield land, rather than having to locate those houses on smaller piecemeal greenfield sites and high-grade agricultural land scattered around the district.</p>				
Walker	John	231	The Ramsgate Society	Object	<p>Concluding Comments on Chapter Chapter 1: Economic Strategy; SP05 and Chapter 2: Town Centre Strategy; SP09 (Ramsgate)</p> <p>7.1 Ramsgate Futures</p> <p>We see two contrasting scenarios for Ramsgate that crucially pivot on the future of the Manston airport site. That is, whether it becomes an air freight cargo hub, or whether the site is developed for mixed use: residential, business, community, recreation. There is a chain of consequences that stems from each that would have an enormous and irreversible impact on the town. We explore each in turn:</p> <p>Manston site as an air cargo hub</p> <p>Decline and demise of the tourism and leisure sector through the frequency of large, noisy, polluting cargo planes flying low level directly over the Royal Harbour, and the town centre then beyond over the built-up area.</p> <p>Removal of any option for the Port to be comprehensively redeveloped, it would have to remain 'industrial', as which it has been seriously loss-making for many years;</p> <p>Decline in inward investment in property and refurbishment across the residential and commercial sectors as the attractiveness of the town is eroded;</p> <p>Maximising the need to develop piecemeal green-field sites for housing, taking mainly high grade agricultural land in order to meet house building targets;</p> <p>Manston site as a comprehensive mixed use development</p> <p>. Utilising large brownfield site,</p> <p>No widespread detrimental impact on existing communities including Ramsgate;</p> <p>Does not undermine or threaten the growing tourism and leisure economy;</p> <p>Opens up the possibility of positive strategic change to the harbour and moribund port such as a 'marina village' that could give a major boost reinforcing the tourism economy;</p> <p>Stimulate town centre business by adding to tourism and leisure opportunities;</p> <p>Maintain or grow inward residential investment;</p> <p>Minimise the need to take high grade green-field sites for housing;</p> <p>Minimise impact on the agricultural sector.</p> <p>The decision on the Manston site is critical to the future of Ramsgate. The airport option is high risk/high cost commercially, and very high cost environmentally, with a chain of very negative consequences to follow.</p> <p>John Walker, Chairman, the Ramsgate Society 3 October 2018</p>		710		Web

Walker	John	231	The Ramsgate Society		Observation	Please see attached PDF which sets our overall response to the Local Plan in a single document.	The former Manston Airport Site should be allocated for mixed use development along the lines proposed by SHP in their most recent planning outline application application.	863	The Ramsgate Society Response to TDC Local Plan october 2018.pdf (1.2 MB)	Web
WARD	DAVID	25			Observation	i BELIEVE THE COUNCIL SHOULD DO EVERYTHING IT CAN TO GET THE AIRPORT REOPENED. THIS I THINK IS THE BEST THING FOR THANET, KENT AND THE COUNTRY.		46		Web
Ward	Linda	157			Observation	Manston should remain as an airport and not be redeveloped for other business uses. It should be given heritage status.		434		Web
Warner	Barbara	198	Mrs		Object	Councillors ignored Officers advice and voted not to remove the designation of the former airport site as aviation use only. A former, failed, money pit airport, that has been closed for over four years. A brownfield site. It is pure speculation by Councillors that a DCO will be viable/granted with no evidence to back this up. WHY? in fact, the evidence of all Independent reports show this as not viable, (KCC, Avia and Falcon) The only report that says it IS viable was undertaken by RSP, the company applying for the DCO. Azimuth (sole trader Sally Dixon) In so doing, the Councillors are potentially, unjustifiably, depriving the community in Thanet of a mixed use development site. Which includes much needed housing, business use, leisure, open spaces, a new school and a Hotel. This decision has had the result of the housing numbers being reallocated to greenfield sites around Thanet instead. How does TDC councillors support , for a company seeking a DCO for opening a cargo hub on the former Manston airport site, sit with the Governments Noise Policy or TDC Noise pollution policy? Cargo planes over Ramsgate town would surely be Noticeable and disruptive = Avoid or even worse, Noticeable and very disruptive = Prevent	Remove designation of Aviation use only on the former Manston airport site. Designate the land as mixed use development site.	578		Web
Warner	Chris	291	mr		Object	Manston Airport, never run at a profit and now closed for four years, without any significant effect, economically or sociably, on the community, a brownfield site, was originally part of the Local Plan for housing development. Although officers advised to the contrary, councillors insisted that the site be reserved for aviation use only, with the knock-on effect that local greenfield sites had to be selected for intended housing development. The airport site is now the subject of a DCO by Riveroak SP to develop the land as an aviation cargo hub. A number of in-depth surveys have found that such a scheme is unviable, notably KCC, Avia and Falcon. The only investigation that considers it could work has been that carried out by Azimuth's Sally Dixon, on Riveroak's (the presenter of the DCO), behalf. The current owners of the site, Stone Hill Park, presented a plan for mixed development, including housing, business use, leisure, open spaces, a new school and an hotel. Whereas SHP have a proven track record in successful developments of this kind, Riveroak, an American finance company, have no experience of running an aviation enterprise of any kind.	Change the designation of the airport site from solely aviation use to one of mixed development as proposed by Stone Hill Park.	846		Web
watson	jan	249			Object	I strongly object to TDC bowing to the demands of River Oak S P and their proposals for use of Manston Airport for cargo flights! I remember when these were last flying over the heart of Ramsgate and deafening the residents = Cargo Lux flights. TDC maintain that tourism is at the heart of Thanets economy, yet they threaten it with these dreadful proposals by River Oak S P!! Introduction of such flights, besides being incredibly noisy (are such noise levels affecting residential areas even legal now??), they will kill off the	You state yourselves that 'the Council commissioned an airport viability study by Avia Solutions. This was to look at whether an airport was a viable option for the site within the plan period to 2031. The report concluded that	761		Web

						<p>tourist industry: Who will come and sunbathe and swim from our glorious beaches, or wish to stay in hotels, with flights stretching overhead? And these flights come in very LOW over the heart of Ramsgate, over prime areas of beach and right above the High Street, both of which will be seriously adversely effected and will threaten both areas.</p> <p>There is also the issue of pollution which my family and I are VERY concerned about too, plus the associated health risks.</p> <p>Then there is the danger of a flight coming down over such a densely populated area. If these ridiculous proposals go ahead, we are not the only residents who will be selling up and moving right out of the area.</p> <p>We feel TDC is being bullied by River Oak S P. Housing on this site is a much needed. An airport is NOT. Why has TDC changed their mind over this issue?? What is going on!</p>	<p>airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the period to 2031. Added to this is the fact that Manston has NEVER proved to be a viable, successful business!</p> <p>So how can the document be sound when you then state that you are to disregard the facts, and allow yourselves to be bullied by River Oak S P and bow to their demands for a DCO?</p>			
Way	John	32	Thanet Area Committee		Observation	<p>Following the production of the Draft Local Plan in 2015, and the Draft Local Plan (Preferred Options) 2017 the views and the concerns of the members of this Committee were conveyed to Thanet District Council.</p> <p>Having received the details of the current variations I am writing once again to repeat the observations that were made at that time.</p> <p>Manston Airport- It is always unanimously agreed by the membership of this Committee that every effort should be made to ensure that the Airport remains and that the site is not adapted for mixed use development.</p>		64		Paper
Webber	Beau	192	Save Manston Airport association		Object	<p>The Save Manston Airport association (SMAA) strongly supports the reopening of Manston Airport for aviation, but strongly objects to the deletion of Policy SP05 and EC4.</p> <p>To remove this protection at a time when the RiverOak DCO has been accepted for Examination, and thus (on past DCO performance) now has an 96% of being accepted, is strange and perverse, and SP05 and EC4 should be retained.</p> <p>The Avia report could not be exposed to the examination at the Planning Appeal Enquiry, is not fit for purpose, is not self-consistent, and should be thrown out.</p> <p>By TDC's own rules, Manston Airport should not be on the TDC Brown Field Register. Manston Airport should be removed from the TDC Brown Field Register</p>	Retain Saved Policies SP6 and EC4.	550		Web
Webber	Beau	192	Save Manston Airport association		Object	<p>A further objection to this local plan, as it stands, is the woeful state of the cooperation with Canterbury and Dover Councils.</p> <p>Paragraph 24 of the NPPF states that local planning authorities and county councils are under a duty to cooperate with each other.</p> <p>Manston Airport is of great significance to all of East Kent, and will bring a large number of jobs.</p> <p>This is a matter of concert to SMAA as a significant proportion of our members live in Canterbury / Herne Bay, and the Deal / Dover area.</p>	Complete extensive consultations with neighbouring districts, which does not seem to be under process in any significant way.	897		Web
Webber	Beau	306	Lab-Tools Ltd.		Object	<p>When KLM started flying from Manston Airport, Lab-Tools moved its NMR / Nano-science laboratory to Ramsgate, Thanet.</p> <p>When the Manston Airport closure was announced, Lab-Tools directors and visitors had 8 flights booked via Manston, not all of which were able to occur.</p> <p>We are extremely pleased that the RiverOak DCO to re-open Manston Airport is progressing so well, and that TDC is supporting Manston Airport now.</p> <p>However we strongly object to the removal of airport protection policies EC4 and SP05 from the draft Local Plan, and believe they should remain.</p>		906		Web

						<p>£0.5 billion investment in Thanet, tens of thousands of jobs, plus the education to upskill local people to carry out these jobs, will be of major benefit to Lab-Tools, and help stop the continual erosion of Thanet firms (i.e. Maplin) that Lab-Tools rely on.</p> <p>Faster delivery of international samples and components will also be most welcome.</p> <p>International visitors to the lab (some by global companies) will also be facilitated, as will the ability to do a national or European visit and return in the same day.</p> <p>Now overnight stays at Heathrow are often required, all adding hundreds of pounds to each flight.</p>				
Webber	Beau	308			Object	<p>With the closure of Manston the ability to do a national or European visit and return in the same day.</p> <p>Now overnight stays at Heathrow are often required, all adding hundreds of pounds to each</p> <p>object to to the removal of airport protection policies EC4 and SP05 from the draft Local Plan, and believe they should remain.</p> <p>With £0.5 Billion investment in Thanet, and 10s of thousands of jobs, funding and expansion of both Canterbury and Margate hospitals should be forthcoming, as will the staff to work at them :</p> <p>"a specialist stroke unit can not be placed at QEQM because the appropriate staff can not be attracted to this part of the country" :https://youtu.be/uuXaDeoFTc4 - A reopened Manston Airport with £0.5 Billion investment will make all the difference.</p> <p>I also fully support the education and training that RiverOak intend to put in place, to upskill the local population, to participate in these jobs, and the enhancing effect it will have on local schools and young people.</p> <p>I strongly object to the deletion of Policies SP05 and EC4.</p>		917		Web
Welcome	A	267			Object	<p>I think the draft local plan is unsound and should be rejected. "Soundness" is explained in paragraph 182 of the National Planning Policy Framework (NPPF). This states - inter alia - that the plan must be justified: meaning that it should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.</p> <p>The draft plan says that to satisfy the NPPF requirements the Council commissioned an airport viability study by AviaSolutions. This looked at whether an airport was a viable option for the site within the plan period to 2031. This report took into account national and international air travel and transport and the way in which it is likely to develop over the next 15-20 years and looked at previous reports and developments in national aviation. The report concluded that airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the period to 2031.</p> <p>In view of the report's findings it is perverse of the council to cling to the desire to see Manston returned to aviation, particularly when an air-freight operation on the scale proposed by RSP would have a hugely detrimental impact on Ramsgate in particular and to a lesser extent on other areas in Thanet and its surrounding villages and coastal towns. This is especially so when the prospects for aviation at Manston are demonstrably far less promising than the well developed plans laid out by the owners of the former airport site. These offer an attractive balance of residential, business and leisure use, supported by proper community infrastructure and open space. Therefore aviation use is certainly not "the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence."</p> <p>What's more, this desire to see a currently unknowable number of aircraft flying low over Ramsgate, day and night, bodes ill for the council's aspirations for the town found elsewhere in the draft plan; [2.41] "The Royal Harbour and historic waterfront are</p>		803		Email

					<p>important for both leisure and commercial users which is important for the vibrancy of the town.</p> <p>The seafront area already has a thriving cafe culture. The Royal Harbour is a Grade II* listed structure and is at the heart of Ramsgate Conservation Area. The regeneration of Ramsgate depends on the continued attractiveness of the Royal Harbour and new development in this area will need to preserve and enhance its character and appearance. It is a tourism and leisure attraction with significant potential and already offers much to smaller pleasure craft. Commercial fishing and ship repair are also carried out in the Royal Harbour."</p> <p>Substantial air-freight operations are incompatible with regeneration for Ramsgate. The draft plan says; "To ensure that the NSIP-DCO process is not prejudiced, the Council is proposing not to allocate the Airport site for any specific purpose in the draft Local Plan." I believe this is a red herring because if PINS were to approve the NSIP nature of RSP's proposals, the local plan would not present much of an impediment. It goes on to say "This also provides the opportunity for any other interested parties to pursue the operational use of the airport through agreement with the landowners or through becoming an indemnity partner as part of a potential CPO process with the Council." This is an unreasonable policy that serves only to prolong the indecision, inaction and worry surrounding this important site. Thanet's own sword of Damocles.</p>				
White	Russell	246		Object	<p>I have seen and lived through the demise of three private owners of Manston airport and their attempts to create a successful and profitable commercial freight hub. Previous studies have shown that a viable and commercial operation can not be substantiated. Two separate administrations have tried and failed to seek out a viable indemnity partner for compulsory purchase of the site with a view to reinstating aviation business operations.</p> <p>A majority of Councillors chose to ignore Officer recommendations to lift the aviation only clause from the site which ceased to operate as an airport four and a half years ago. This is preventing potential mixed use development which supports tourism leisure industry open spaces and sustainable housing.</p>	Remove the clause protecting the former airport as a site for aviation use only and designate it as a mixed development site.	754		Web
Wildash	Elaine	221		Object	<p>In the draft of the Local Plan of 18th January 2018, the disused airfield at Manston was allocated for mixed development, including the building of 2,500 homes. The draft Local Plan said: "Based on SA assessment, option NS5 (the former airport site) was deemed the most likely opportunity to provide a sustainable new settlement due to its size, which would allow comprehensive provision of uses and facilities, and its unique status amongst options as a brownfield site."</p> <p>This decision was arrived at after TDC commissioned reports from independent aviation experts Avia on the future viability of the disused airfield site as an airport. The report stated that the site was extremely unlikely ever to be viable as an airport, including as a freight airport. This is backed up by other reports which have stated the same thing. In fact TDC have no independent expert advice which suggests that that the former Airport could ever be a viable concern including work by Sally Dixon/RSP which is based on the York Aviation report to which York Aviation have said Sally Dixon has misunderstood and misrepresented their work.</p> <p>Despite this, TDC have chosen to go against the reports and against their own officers' advice to try to protect the former Airport site. It is clear that TDC understand that by taking this stance (which is not evidence based) they are putting the Local Plan at risk. TDC have stated:</p> <p>This approach is not fully aligned with the Council's own evidence base in respect of the viability of the Airport, and carries a higher risk of being found not sound. Whilst recognition of the DCO process is a relevant consideration, previous advice from MHCLG has been that the Local Plan should not be delayed for the DCO process.</p>	The former Airport should be used for housing.	668		Web

						<p>Secondly, there is a risk that, if the DCO/CPO process does not proceed, the site may be available for housing in addition to the sites identified under this Option. To some extent, that risk may be mitigated by phasing some of the housing beyond the Plan period, but there remains a risk that Thanet could experience higher housing development during the Plan period than was previously anticipated.</p> <p>Thirdly, there is a risk that having no policy to protect the airport (which the Council could not justify on the basis of evidence) means that there is a risk that a planning application/Appeal for development at the Airport could have a greater chance of success. However, that risk already exists, so this is to recognise that this may represent an increased degree of risk.</p> <p>If no decision is made by the Council in relation to the draft Local Plan, there is significant risk of direct intervention by the Minister, a resulting loss of local control over the Local Plan and additional costs for the authority.</p> <p>Instead housing which would have been allocated to the Manston site is now being allocated in and round the villages on green belt land without the proper infrastructure.</p>				
Wing	Rebecca	227			Object	<p>Given that TDC's own report in the Local Plan strongly indicates that Manston is 'very unlikely to be viable' I find it incomprehensible that some elected officials still think that keeping this land 'ear-marked' for aviation is a great economic idea. It is time to move on, I believe we had a significant 'green energy' company wanting to use the hangers for the next generation of wind turbines and certainly feel given our location with plenty of wind, solar and wave power it is time for the third option. A green energy development and high end manufacturing site with a 'green village' and associated services. The present owners SHP should be encouraged to pursue this end, Thanet could become the Green Energy equivalent of 'Silicon Valley' bringing us into the future and creating high end jobs and housing.</p>	<p>The land should not have been redesignated for aviation only because this limits its use and possible means of providing much needed employment and housing. I believe TDC should have been 'twin tracking' possible use with the present owners SHP and any viable aviation companies with the necessary money (which there appear to be none). I also feel that constantly objecting to plans submitted by the present owners is not in the best interest of the area. We could have had both jobs and housing on that site by now but we seem to be 'blindly' following a company that is not able to demonstrate even to PINS that they have access to the necessary finance.</p>	691		Web
Wraight	Kenneth	141	1959		Object	<p>Riveroak strategic partners have no knowledge of running a cargo hub nor does it have any of the necessary funding available now from dco application funding statement all depend on what it can raise if dco is successful. Lack of experience lack of understanding the local historical buildings under the flight paths and effects on local school's. Cannot take them serious as every time RSP speak it contradict it self with what's in dco application. Council is ignoring legal advice and its own commissioned reports on manston viability. Seem to be a hidden motive with this administration in relationship with rsp</p>	<p>Mixed use for all the new business ventures tdc want and also herity side for aviation and light aviation use</p>	359		Web