

Samara Jones-Hall

Matter 1

Issues 4 – Questions 1, 2 and 8

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STATEMENT REGARDING CONFLICT OF INTEREST AND IMPARTIALITY

For the avoidance of any doubt and in the interests of full transparency, I hereby confirm that I do not have any interests, either financial or otherwise, in the Manston site or any other rival development beyond those of a local business and local resident with strong concerns regarding the devastating impacts of the proposed development on the local area, economy, environment and population. I have not accepted any payments or any other form of compensation or inducements for presenting this or any of our other submissions or representations to the Inspectors. Any offers or suggestions of such from any party will be refused and immediately reported to the Inspectors.

My comments below are specific to the proposed development of an airport by Riveroak Strategic Partners Limited on the site known as the Manston site and the questions raised by the Inspectors at 1, 2 and 8 of Matter 1, Issue 4.

Matter 1, Issue 4, Question 1

1. I respectfully request the Inspectors to determine how this proposed airport development is sustainable within Manston given that –
 - (a) Proposed airport is solely dependent upon road surface access;
 - (b) Road cargo traffic (HGV traffic) will be a relatively large proportion of overall traffic on the local road system;
 - (c) Fuel of all planes must be transported by road using fuel tankers;
 - (d) There is an unreliable and unpredictable road surface access a long way from the rest of the UK let alone London;
 - (e) Proposed airport has poor connectivity and poor public transport access. It is important to note that even if the aspirational railway station Thanet Parkway station is built, Riveroak Strategic

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Partners Limited has stated in Appendix M (Public Rights of Way Management Plan) (document reference TR020002/APP/5.2-25) that a sustainable pedestrian route to this proposed station could not be implemented¹;

- (f) Proposed development is not located close to a Strategic Rail Freight Interchange;
 - (g) Proposed development is located in an area of very poor economic geography – there are no distribution centres, logistics infrastructure or business communities with import/export markets; and
 - (h) Proposed developed will consume a lot of energy.
2. I respectfully request the Inspectors to determine how this proposed development positively meets the NPPF 2018 particularly in relation to:
- a. Delivering a Sufficient Supply of Homes (in the removal of a brownfield site for housing, moving housing onto greenfield land and the resulting limited space/ capacity for additional space for housing due to population growth as forecasted (although not evidenced) by Riveroak Strategic Partners Limited);
 - b. Ensuring the Vitality of Town Centres - particularly given the recent House of Commons to be printed 13 February 2019, House of Commons Housing, Communities and Local Government Committee, High Streets and town centres in 2030 Eleventh Report of Session 2017-19.

Ramsgate’s town centre is a *“living’ town centre” with much charm...“It has a different, but complementary offer to Margate*

¹ [https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-002447-5.2-25%20-%20Environmental%20Statement%20-%20Volume%2025%20-%203%20of%203%20-%20Transport%20Assessment%20Appendix%20J%20\(Junction%2021B\),%20Appendices%20K-O%20-%203%20of%203.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-002447-5.2-25%20-%20Environmental%20Statement%20-%20Volume%2025%20-%203%20of%203%20-%20Transport%20Assessment%20Appendix%20J%20(Junction%2021B),%20Appendices%20K-O%20-%203%20of%203.pdf)

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*–more ‘up-market’, smaller-scale and focused on the sea and interaction with it and on the town centre and its architecture and surrounding green spaces’*². Unlike many other seaside towns Ramsgate is open and bustling all year round. Ramsgate has 5 bank branches (NatWest, Lloyds, Halifax, Barclays, HSBC), a post office, greengrocers, butchers, bakers, home-baking stores, haberdashers, cafes, public houses, restaurants, hairdressers, beauty salons, wellbeing practitioners, leisure centre, dentist, chemists, cobblers, clothes and shoe shops, galleries, art shops, book shop, office supplies, gift shops, churches, open market, chandlery, library, a Wilko, Aldi and Waitrose etc.

In short, Ramsgate Town Centre continues to serve its local community very much as a traditional market town centre with a traditional mixture of independent grocery and comparison goods retail alongside cafes, public houses, restaurants and services³. Of the traditional centres within Thanet Ramsgate town centre has the largest turnover at £67 million⁴. There has been circa 40 million plus of mostly private investment in Ramsgate since the closure of the airport and over 20 restaurants, cafes, bars and 10 retail and creative spaces have opened since the airport closure in May 2014.

This is in sharp contrast to the nationwide trend of high street store closures and online shopping drawing footfall away. Protecting this traditional town centre mix of uses is important in ensuring Ramsgate Town Centre continues to contribute to the sustainability of Ramsgate as a residential community, which is

² Historic England *Urban Panel Report: Ramsgate 28-29 September 2016* Page 16, Paragraph 7.1

³ *Ibid* Page 15 Paragraph 2

⁴ Arup (August 2018) Thanet District Council Draft Local Plan to 2031 Sustainability Appraisal – Environmental Report Page 46, Table 13: Key Sustainability Issues for Thanet

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part of its attraction for visitors⁵.

Ramsgate Town Centre's sustainability is at risk (and by extension the sustainability of Ramsgate as a residential community and visitor attraction) from the proposed development of an airport by Riveroak Strategic Partners Limited with flight swathes directly overhead and low flying flights of 400---600 feet;

- c. Promoting Health and Safe Communities (particularly given that current NHS figures show Thanet to be the fourth worst area in the country for the number of GPs per patient with just one doctor for every 2,500 people, the small provision of A&E services and that the emergency stroke services for Ramsgate will be moved to Ashford over an hour away);
- d. Promoting sustainable transport (particularly given sole dependency of the proposed airport development by Riveroak Strategic Partners Limited on road infrastructure for passengers, workers, road haulage and fuel tankers, the negative impact on quality walking and cycling facilities (since the airport closed, Ramsgate is part of the 28-mile circular Viking Coastal Trail (one of the most attractive cycle routes in Kent), voted in top 100 ITV British Walks (2018), Active Ramsgate was awarded Gold (2017) and awarded by Explore Kent the first We Love Cyclists and Walkers accreditation status in 2016);
- e. Making Effective Use of Land (particularly given Thanet District Council's commissioned reports on the Commercial Viability of Manston Airport which confirmed that "*AviaSolutions concludes that airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the*

⁵ Historic England Urban Panel Report: Ramsgate 28---29 September 2016 Page 15 Paragraph 2

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period to 2031⁶ as well as recent reports from York Aviation and Altitude Aviation Advisory Limited in February 2019);

- f. Achieving well-designed places – the design of the development proposed by Riveroak Strategic Partners will not be available until some time after the DCO (if successful);
- g. Meeting the Challenge of Climate Change, Flooding and Coastal Change;
- h. Conserving and Enhancing the Natural Environment; and
- i. Conserving and Enhancing the Historic Environment (particularly in light of significant concerns raised by Historic England⁷ and its additional submission in relation to Ramsgate⁸, Kent County Council, Thanet District Council, Ramsgate Society⁹ as well as the incompatibility of the proposed development with draft Local Plan SP09 and Policy SP33 at Paragraphs 4.83 and 4.86 of Thanet’s draft Local Plan which lists for example: A designated Registered Park and Garden, Albion Place Gardens in Ramsgate, The presence of significant historical technical innovation - Albion Place Garden Grade II, A number of highly significant Grade I, or II* listed buildings including St Augustine’s and Sir Moses Montefiore

⁶ AviaSolutions Final Report for Thanet District Council September 2016 *Commercial Viability of Manston Airport* at para 2.5 page 11

⁷ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003159-Historic%20England%20-%20Written%20Representations.pdf>

⁸ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003671-Historic%20England%20-%20Additional%20Written%20Representations.pdf>

⁹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003648-The%20Ramsgate%20Society%20-%20Comments%20on%20Historic%20England%E2%80%99s%20Written%20Representation%20to%20the%20Examining%20Authority.pdf> and <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003647-The%20Ramsgate%20Society%20-%20Comments%20on%20response%20to%20the%20Examining%20Authority%E2%80%99s%20First%20Written%20Questions%20-%20Historic%20Environment.pdf>

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Synagogue in Ramsgate, The Grange (Ramsgate) the first modern house and Grade I listed designed and lived in by Augustus Pugin who designed the interiors of the Houses of Parliament, Ramsgate Royal Harbour, designated in 1821, has a number of Grade II and Grade II* listed buildings and structures ranging from the Customs House and Clock tower, harbour inner basin walls and Jacob's Ladder to rare seaside structures such as the East Cliff lift. Ramsgate, has also, been home to the romantic poet Samuel Taylor Coleridge, Vincent Van Gogh, Wilkie Collins etc and the subject of great painters including Joseph Tissot, JM Turner and William Powell Frith's Ramsgate Sands held in the Royal Collection Trust).

3. There is a general presumption against inappropriate development on the countryside¹⁰ and that such development should not be approved except in very special circumstances¹¹. It is unclear how it has been evidenced that this countryside (substantial part of Northern Grass) is no longer needed or how this loss of countryside (substantial part of Northern Grass) can be replaced by equivalent or better provision in terms of quantity in a suitable location¹².
4. Where will all this proposed aviation development be relocated to if the Northern Grass is found to have archaeological significance?
5. The environmental, social and socio-economic impact has not been

¹⁰ Department for Transport (June 2018) *Airports National Policy Statement: new runway capacity and infrastructure at airport in the South East of England Presented to Parliament pursuant to Section 9(8) of the Planning Act 2008 Moving Britain Ahead* at Paragraph 5.114

¹¹ Department for Transport (June 2018) *Airports National Policy Statement: new runway capacity and infrastructure at airport in the South East of England Presented to Parliament pursuant to Section 9(8) of the Planning Act 2008 Moving Britain Ahead* at Paragraph 5.114

¹² Department for Transport (June 2018) *Airports National Policy Statement: new runway capacity and infrastructure at airport in the South East of England Presented to Parliament pursuant to Section 9(8) of the Planning Act 2008 Moving Britain Ahead* at Paragraph 5.112

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identified of the revised proposal by the airport developer of circa 127,000 ATMs¹³ plus night flights (Quota Count 3028 this could be up to an additional 9,000 ATMs) and an additional training flights of 36,000 ATMs a year rather than the originally proposed 17,000 ATMs – an increase of at least 792% ATMs on circa 2200 houses which have been identified to be developed on new strategic housing sites very near the proposed airport.

6. The impact of not only noise, vibrations of planes been taken into account but also freight loading and unloading and also all the extras HGVs and fuel tankers and workers etc has not been taken into account for this revised proposal of an increase of at least 792% ATMs since the submitted Environmental Statement by Riveroak Strategic Partners Limited.
7. It has not been identified or quantified as to what happens to our housing requirements if people just simply do not want to live in these new proposed housing developments on strategic sites so close (and in places an unprecedented proximity to the proposed airport – less than 1km from the runway not the airport the runway).
8. The two regulatory public safety zone requirements have not been

¹³ Applicant Response to Question by the Examining Authority at OP1.11 “*The physical capability of Work No. 9, the 19 cargo stands, is as mentioned in the application, calculated as 83,220 ATMs a year. The physical capability of Work No. 10, the three recycling stands is calculated as 36 ATMs a year (each stand receiving one aircraft which takes a month to dismantle). The physical capability of Work No. 11, the four passenger stands, is calculated as 43,800 ATMs a year. This is based on each stand managing 15 incoming and outgoing flights between 0700 and 2300 with an hour's dwell time and 10 minutes between a flight leaving and the next one arriving*”. Please see <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003366-RiverOak%20Strategic%20Partners%20-%20Response%20to%20the%20Examining%20Authority's%20Written%20Questions.pdf>

Please note above does not include night time quota of 3028 and training flights of 36,000 ATMs a year also forecasted.

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factored into the environmental, social and socio-economic impact¹⁴.

Matter 1, Issue 4, Question 2

1. As identified by Thanet District Council in its Local Impact Report¹⁵ and by Historic England in its Written Response of 15 February 2019¹⁶. A substantial portion of what is known as the Northern Grass is not considered to be previously developed land and any development here would be considered as development on a greenfield site in the countryside. Further, there is inadequate understanding of the archaeological significance of the North Grass Area and some areas of the proposed airside development, historic buildings and the landscape character of the airfield, which undermines the ability to make informed decisions about the proposed development.
2. Given that proposed development of an airport by Riveroak Strategic Partners Limited has forecasted 350,000 tonnes of airfreight¹⁷ the proposed development will require an additional circa 500 Ha of employment land in Manston¹⁸, I respectfully request the Inspectors

¹⁴ 5 March 2010 Department of Transport *Control of Development in Airport Public Safety Zones*

¹⁵ Thanet District Council Local Impact Report Application by Riveroak Strategic Partners to upgrade and reopen Manston Airport at Para 4.7.6, 4.7.9, 4.7.10, 4.7.13

¹⁶ Historic England Written Representations of the Historic Buildings and Monuments Commission for England (Historic England) at Para 1 (Summary) and Paras 3-5

¹⁷ RiverOak Strategic Partners Deadline 3 Submission --- Appendices to Answers to First Written Questions Appendix G.1.10 Bev Coupe CV January 2019

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002---003366---RiverOak%20Strategic%20Partners%20---%20Response%20to%20the%20Examining%20Authority's%20Written%20Questions.pdf>

¹⁸

Riveroak Strategic Partners Limited the developer of the proposed airport has stated its proposal is for “350,000 tonnes of air freight and 1.5 million passengers a year” (see above footnote). To put this into context East Midlands Airport is currently the UK’s largest pure cargo freight airport, handling 324,216 tonnes (ie: Applicant is proposing to handle more freight than East Midlands Airport). As such it must be held to the same standard as East Midlands Airport.

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to determine how this proposed development is sustainable within Manston, particularly in light of the amount of employment land available in Manston, the higher housing pressure in Thanet and recent intervention letter from Rt Hon James Brokenshire MP Secretary of State for Housing, Communities and Local Government to Councillor Bayford.

Matter 1, Issue 4, Question 8

1. Given housing has now been pushed out to greenfield sites without infrastructure I respectfully request the Inspectors determine the negative impact on Thanet of this action.

Currently, East Midlands is adding the SEGRO Logistics Park East Midlands Gateway (SLPEMG) which is a 700 acre (283 Ha) development with planning consent for up to 6,000,000 sq ft of logistics accommodation. The development incorporates a 50 acre (20 Ha) Strategic Rail Freight Interchange (SRFI) which will include a rail freight terminal, capable of handling up to sixteen 775m freight trains per day, container storage and HGV parking.