

**Samara Jones-Hall**

**Matter 10**

**Issue 7 – Question 3**

**Economic Growth**

***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.*

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1. The Plan would need to take into the very real risk and impediment to the airport of no flight paths (airspace) – ie nowhere to actually fly its planes.l and the associated social economic, environmental and economic impacts. Currently the developer has not started the formal 110l week process. It has stated in the DCO process that it will do this after the DCO (ie after January 2020). It has taken this action despite the CAA hastening it particularly as the CAA (Civil Aviation Authority) has confirmed thtat given current proposals by Heathrow airport in relation to the third runway, the airspace design in the Southl East and beyond, including airspace around Manston, **will require significant change**. This means that until January 2022 it will be unknown if there will be any airspace

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available and if there is how much. This also applies to the aerodrome certificate which again takes 1 ½ year and the developer has stated that it will until it owns the land for this certification. As you will be aware compulsory acquisition takes a very long time perhaps 5 to 6 years and then a year and a half for an aerodrome certificate **we could be living in uncertainty and this land not used for 7 to 8 years**. This also does not seem to make the best use of the land particularly in light of the housing shortage.

2. The Plan must recognize and mitigate against the loss and/or reduction of private inward investment that Ramsgate has enjoyed since the closure of the airport by accessing or the providing public funds. Further, the Plan will need to quantify and mitigate against job losses due to opportunity cost of potential investors and developers being deterred from investing in Ramsgate due to risks presented by airport, for example due to inadequate financing and funding (detailed below). This will be amplified due to the developers poor handling of the Airspace Change Process as there are no flight paths to date for planes to actually fly.
  
3. There has been a large – circa 40 million plus mostly private investment in Ramsgate since the airport closure: **EXAMPLES OF INWARD INVESTMENT TO RAMSGATE SINCE THE AIRPORT CLOSED IN MAY 2014 (PARTICULARLY USING EMPTY OR UNUSED HERITAGE SITES)**
  - a. Micro Museum Expansion (2019)
  - b. Van Gogh Sculpture in Spencer Square (2019)

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- c. Wetherspoons (Royal Victoria Pavillion) (2017) a UK Top Employer<sup>1</sup> £4.5m development (Number of tables just under 350 with large terrace, covers 900, staff went up to 200 currently in winter staff levels are 120-130)
- d. Foresters Hall which has been a community venue for over 200 years purchased by East Kent Mencap through a Community Asset Transfer (2019)
- e. St Augustine's Visitor Centre built in 1860 (GBP 1.2m)
- f. Albion House (27 bed luxury hotel) (2014) 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)*
- g. Archive Homestores (10 staff members) in the Military Arches – military arches are 100% occupied now the airport has closed.
- h. Pugin's The historical Grade II Listed former Hovis Flour Mill in central Ramsgate is being transformed into a mix of contemporary residences
- i. £27 million development of old Ramsgate police station Cavendish Street and former Magistrate's House (2017/8)
- j. Landmark Trust's Grade I listed the Grange (1844) holiday home.
- k. Falstaff built in 1801 within the West Cliff conservation area as well as three seaside vacation apartments
- l. Petticoat Emporium (2015) 175 individual traders covering 205 pitches as well as a variety of cabinets, rails and display options and two shops run by the shop owners: Coastal Chic and Bow Street Bags (14 staff members)

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<sup>1</sup> <https://www.jdwetherspoon.com/news/2018/02/wetherspoon-has-been-certified-as-a-top-employer-uk-for-2018>

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- m. Ellington Park has been awarded £1.64m support from the Heritage Lottery fund **to regenerate and conserve the park.**
  - n. Ramsgate is part of *Pioneering Places* an ambitious project that will make East Kent an even better place to live, work and visit by exploring heritage, developing civic pride and connecting artists and communities. The investment will act as a catalyst for Ramsgate's vibrant and growing cultural scene, bringing with it greater community cohesion, educational attainment and a positive impact on jobs, health and wellbeing. The focus is a **public artwork** commissioned at a value of £300,000 of the £1, 489,255 funding to be **positioned at the Royal Harbour environs.**
  - o. Ramsgate received an initial £50,000 funding to rescue Ramsgate's Rock Gardens for work on the Pulhamite rocks on the Madeira Walk fountain and Albion gardens.
  - p. The Military Arches have 100% occupancy now (rather than 50%) (2013/14)
  - q. Ramsgate Music Hall (voted best small venue by NME in 2015)
  - r. Ramsgate Tunnels (re-opened May 2014)
  - s. Circa twenty restaurants and cafes and circa 10+ shops have opened since the airport closed.
4. The employment figure will need to be revised in the Plan. The figure of 5000 will need to be reduced to reflect the automatic job loss of circa 2000 direct jobs as there is currently an alternative development put forward by the UK lawful owner with direct jobs attached.
5. The employment figure will need to be revised in the Plan. The figure of 5000 will need to be reduced to reflect the impact on job losses from impact to businesses in particular tourism, leisure, hospitality, creative

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industries and catalytic losses. (eg fruit and veg suppliers, butchers, cleaners, etc). It is important to note for example that Wetherspoons (opened in 2017 after the airport closure) situated on the beach front and directly under the flight swathes with a large terrace employs 200 people which is significantly higher than the number of people employed at Manston at its peak.

6. The Plan will need to be revised to take into account the loss of tourist accommodation in Ramsgate and by extension a loss across Thanet. We know from Visit Thanet statistics that tourism has shot up 36% since 2010 and most recent Visit Britain statistics (2017) show Ramsgate is now number one destination in Thanet, (20k room nights in 2017 versus 15k in Margate and 18k in Broadstairs). Day flights and night flights at a height of 400-600 feet will make Ramsgate an undesirable location.
7. Our hotels depend on the Ramsgate location and the tranquility. For example one of our hotels Albion House built in 1791 was 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) as you will note all these accolades occurred after the closure of the airport.
8. The Plan will need to be revised to take into account the reduced tourist offer. According to Visit Kent the type of tourist that visits Ramsgate is in the mature tourist with a large amount of disposable income. They are attracted to Ramsgate's heritage, architecture (Ramsgate is second only to London for its Georgian and Victorian buildings and only to Bath for its Regency architecture), high quality leisure offer (Active Ramsgate), its artistic (Van Gogh, Tissot, Frith and Turner to name but a few) and

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literary connections (Coleridge, Austen and Wilkie Collins to name but a few), churches (dating back to 1062 and including St Augustine's Visitor's centre (opened 2017)), café culture and restaurants. This tourist/ heritage/ leisure offer would be severely impacted by the cargo hub.

9. The Plan would need to be revised to replace the loss of being able to enjoy kitesurfing, sailing, kayaking, canoeing, diving, seal boat trips, bird watching, tennis (open air tennis courts are at Spencer Square), swimming, football, croquet, bowls, walking, cycling, golfing, and horse riding which are under or in near proximity to the proposed flight swathes and low flying planes of 400--600 feet.
10. The Plan would need to take into account the loss and/or reduction in jobs, income and status of Ramsgate holding significant national events such as the British Kitesurfing championships which will be held in 2019 (its second year), it was voted in the Top 100 ITV British walks (2018), Active Ramsgate was awarded GOLD in the Community Care Award (2017) and Explore Kent awarded Ramsgate in 2016 with the first "We Love Walkers and Cyclists" accreditation status and 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 which are under or in near proximity to the proposed flight swathes and low flying planes of 400-600 feet.
11. The Plan would need to take into account the loss and/or reduction in jobs, income and status Ramsgate and the impact to the second largest international regatta in the UK from the marina Ramsgate Week and the Regatta, Winter Wassail, May Fayre, Great Bucket and Spade Run, Looping the Loop, Ramsgate Festival of Sound (outside and indoors),

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Adventures in Performance, Ramsgate Carnival, and the Christmas laser light show which are under or in near proximity to the proposed flight swathes and low flying planes of 400-600 feet.

12. The Plan will need to be revised to take into account depressed house prices. Since the airport has closed house prices in Ramsgate have risen 36.90%<sup>2</sup> which is significantly more than the national average of 27.05%<sup>3</sup>
  
13. The Plan would need to take into account that Ellington Park has been awarded £1.64m support from the Heritage Lottery fund to regenerate and conserve the park. Ellington Park dates back to 1652 and is under or in very close proximity to the flight swathes and low flying planes of 400- 600 feet.

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<sup>2</sup> [https://www.zoopla.co.uk/house-prices/browse/kent/ramsgate/?q=ramsgate&search\\_source=house-prices](https://www.zoopla.co.uk/house-prices/browse/kent/ramsgate/?q=ramsgate&search_source=house-prices)

<sup>3</sup> <https://www.zoopla.co.uk/house-prices/browse/england/?q=england>

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17. It has been well documented throughout the past 5 years to date that the proposed developer has yet to either during the two failed CPO attempts with Thanet District Council and now during the current DCO application evidence that it has the necessary financing and funding in place. This has been highlighted by the most recent communication from the Planning Inspectorate under Planning Act 2008 – section 92 at paragraph 5<sup>4</sup>.
18. The Plan will need to be revised to take into account for and mitigate the very real prospect of a very lengthy period of uncertainty. The statutory period for compulsory acquisition is lengthy, as detailed above there are significant financing funding issues and it is likely to be acrimonious so a great number of years could pass before anything happens.
19. The Plan will need to be revised to take into account for and mitigate the very real prospect of failure. A large number of reputable independent aviation experts have stated that the cargo airport proposal is not viable or feasible. The impact and effect (financial, aesthetically and on civic pride) on Ramsgate and Thanet of another failed enterprise – the site known as Pleasurama and the Port of Ramsgate to name two – in addition to the historic failure of the Manston site. As you will be aware in the 16 years of commercial operation the site lost 100 million pounds and employed only at its peak 150 people many of them in a seasonal capacity.
20. The Plan will need to assess the impact on setting in relation to such heritage assets in Ramsgate including (but means not limited to) A designated Registered Park and Garden, Albion Place Gardens in

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<sup>4</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003649-TR020002%20-%20CA%20Hearing%20Agenda\\_FINAL.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-003649-TR020002%20-%20CA%20Hearing%20Agenda_FINAL.pdf)



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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 Synagogue in Ramsgate, Ellington Park, 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.

21. The Plan will need to mitigate against further impacts on Ramsgate's "at risk" assessment by the Council and Historic England<sup>5</sup>.
22. The Plan will need quantify and mitigate the costs of noise mitigation and insulation on listed buildings as well as properties within the conservation area either owned by the Council, or are owned by or used by vulnerable people. Particularly as Ramsgate has the largest conservation area in Kent<sup>6</sup> and a large number of listed buildings<sup>7</sup> totaling around 900 listed buildings of which five are Grade I and eleven are Grade II and 443 are residential.

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<sup>5</sup> *Creative Industries in Historic Buildings and Environments*, Colliers, October 2018, pg. 76, para 3.7.1

<sup>6</sup> Colliers International (October 2018) *Creative Industries in Historic Buildings and Environments Conservation Area Case Studies* Page 81

<sup>7</sup> <https://britishlistedbuildings.co.uk/england/ramsgate-thanet-kent#.XIEygp7RTY>

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23. The Plan will need to quantify and replace the circa 15 Ha lost public spaces, playing fields, communal areas as well as our sandy beaches which are under the flight swathes with low flying planes of 400—600 feet.
24. The Plan would need to quantify and mitigate against the impact of the cargo airport proposed on the Conservation Area of Ramsgate must be considered under statute and case law. The relevant statute law is Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Section 66(1) of the 1990 Act. The relevant case law is *Barnwell Manor Wind Energy Ltd v East Northhamptonshire District Council and Others* CA 18 Feb 2014. The cited statute and case law requires a decision-maker to give the desirability of preserving the building or its setting not merely careful consideration but considerable importance and weight when balancing the advantages of the proposed development against any harm.
25. The Plan would “need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its on going conservation<sup>8</sup>”.
26. Setting is defined in the National Planning Policy Framework as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the assets and its surroundings evolve. Elements of a setting may make a positive or negative contribution to to the significance of the asset, may affect the ability to appreciate that

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<sup>8</sup> Historic England (2017) *The Setting of Heritage Assets- Historic Environment Good Practice Planning Note 3* (Second Edition) Page 2

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significance or may be neutral<sup>9</sup>

27. Ramsgate’s Royal Harbour the only Royal Harbour in the UK which the HE Colliers Report of October 2018 describes as “ the defining visual and historical architectural feature of the town<sup>10</sup> .” Its loss would have a very real economic impact. The Royal Harbour is the most used image of Thanet used by Visit Kent because of its appeal which brings visitors to Thanet.
28. In this instance, ‘ large scale ’ may reasonably include a cargo hub the scale which has been proposed which is **nearly 800% larger** than the previous site and ‘intrusive’ may reasonably include low flying aircraft as a result of the “implications of development affecting the setting of heritage assets<sup>12</sup> ”.
29. ‘... assessment should address the attributes of the proposed development

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<sup>9</sup> Annex 2: Glossary, National Planning Policy Framework, Department for Communities and Local Government

<sup>10</sup> *Creative Industries in Historic Buildings and Environments*, Colliers, October 2018, pg. 76, para 3.7.1

<sup>11</sup> Historic England (2017) *The Setting of Heritage Assets- Historic Environment Good Practice Planning Note 3 (Second Edition)* Page 5

<sup>12</sup> Historic England (2017) *The Setting of Heritage Assets- Historic Environment Good Practice Planning Note 3 (Second Edition)* Page 8, para 17

<sup>13</sup> Historic England (2017) *The Setting of Heritage Assets- Historic Environment Good Practice Planning Note 3 (Second Edition)* Page 12, para 32

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in terms of its .. wider effects<sup>14</sup>

32. Wider effects of the development (includes) **Economic viability**<sup>15</sup> ”
33. ‘Cumulative and complex impacts” and “wider effects” of a development may reasonably include low flying aircraft at 400ft to 600ft above the conservation area/HAZ as a result of the development.
34. “Those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected<sup>17</sup> ”
35. “An assessment of the contribution to significance of a view does not depend alone on the significance of the heritage assets in the view but on

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<sup>14</sup> Historic England (2017) The Setting of Heritage Assets- Historic Environment Good Practice Planning Note 3 (Second Edition) Page 12, para 33

<sup>15</sup> Historic England (2017) The Setting of Heritage Assets- Historic Environment Good Practice Planning Note 3 (Second Edition) Page 13

<sup>16</sup> Historic England (2017) The Setting of Heritage Assets- Historic Environment Good Practice Planning Note 3 (Second Edition) Page 6 Paragraph 11

<sup>17</sup> Historic England (2017) The Setting of Heritage Assets- Historic Environment Good Practice Planning Note 3 (Second Edition) Page 6 Paragraph 11

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the way the view allows that significance to be appreciated . The view may be part of a landscape, townscape or other design intended to allow a particular attribute of the asset to be enjoyed ... Composite or fortuitous views which are the cumulative results of a long history of development, particularly in towns and cities, may become cherished and may be celebrated in artistic representations<sup>18</sup>.

38. Three of many examples: Thanet's skies minus aircraft are a key contributing factor to the setting of the HAZ, with JMW Turner immortalising them in numerous works in the English landscape tradition and famously writing 'the skies over Thanet are the loveliest in all Europe'. Ramsgate Sands, with the Eastcliff section of the conservation area,(which has hardly changed since the original painting) as a backdrop, are the subject of Frith's 'Life at the Seaside' in the Royal Collection and Royal Road, Ramsgate, is the subject of a pencil sketch by Van Gogh during his residency in the town in 1876.
39. "A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it<sup>19</sup>"

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<sup>18</sup> Historic England (2017) The Setting of Heritage Assets- Historic Environment Good Practice Planning Note 3 (Second Edition) Page 11 Paragraph 30

<sup>19</sup> Historic England (2017) The Setting of Heritage Assets- Historic Environment Good Practice Planning Note 3 (Second Edition) Page 2

<sup>20</sup> *Ibid*